



GREAT YARMOUTH BOROUGH COUNCIL

Policy and Resources Committee

Date: Tuesday, 06 December 2022

Time: 18:00

Venue: Council Chamber

Address: Town Hall, Hall Plain, Great Yarmouth, NR30 2QF

AGENDA

Open to Public and Press

1 APOLOGIES FOR ABSENCE

To receive any apologies for absence.

2 DECLARATIONS OF INTEREST

You have a Disclosable Pecuniary Interest in a matter to be discussed if it relates to something on your Register of Interests form. You must declare the interest and leave the room while the matter is dealt with.

You have a Personal Interest in a matter to be discussed if it affects

- your well being or financial position
- that of your family or close friends
- that of a club or society in which you have a management role
- that of another public body of which you are a member to a greater extent than others in your ward.

You must declare a personal interest but can speak and vote on the matter.

Whenever you declare an interest you must say why the interest arises, so that it can be included in the minutes.

3	<u>MINUTES</u>	4 - 14
	To confirm the minutes of the meeting held on the 8 November 2022.	
4	<u>FORWARD PLAN</u>	15 - 15
	Report attached.	
5	<u>GORLESTON SEAFRONT MASTERPLAN</u>	16 - 45
	Report attached.	
6	<u>RENEWAL OF PUBLIC SPACE PROTECTION ORDER NO.2 - VEHICLE RELATED ANTI-SOCIAL BEHAVIOUR</u>	46 - 81
	Report attached.	
7	<u>GREAT YARMOUTH SERVICES LTD BUSINESS PLAN 2023-24</u>	82 - 137
	Report attached.	
8	<u>DRAFT COASTAL ADAPTATION SUPPLEMENTARY PLANNING DOCUMENT CONSULTATION</u>	138 - 419
	Report attached.	
9	<u>NEW LOCAL PLAN OPTIONS CONSULTATION</u>	420 - 482
	Report attached.	
10	<u>SPENDING OF DEVELOPER CONTRIBUTIONS (SECTION 106/SECTION 111) ON OPEN SPACE PROVISION</u>	483 - 486
	Report attached.	

11 GENERAL FUND ASSET MANAGEMENT STRATEGY 2022-2025 487 - 498

Report attached.

11a CONFIDENTIAL APPENDIX - ASSET MANAGEMENT STRATEGY

Details

12 2022-23 TREASURY MANAGEMENT MID YEAR REPORT 499 - 510

Report attached.

13 PARISH GRANTS REVIEW UPDATE 511 - 517

Report attached.

14 ANY OTHER BUSINESS

To consider any other business as may be determined by the Chairman of the meeting as being of sufficient urgency to warrant consideration.

15 EXCLUSION OF PUBLIC

In the event of the Committee wishing to exclude the public from the meeting, the following resolution will be moved:-

"That under Section 100(A)(4) of the Local Government Act 1972, the public be excluded from the meeting for the following item of business on the grounds that it involved the likely disclosure of exempt information as defined in paragraph 1 of Part I of Schedule 12(A) of the said Act."

16 CONFIDENTIAL MINUTES

Details



GREAT YARMOUTH
BOROUGH COUNCIL

Policy and Resources Committee

Minutes

Tuesday, 08 November 2022 at 18:00

PRESENT:-

Councillor Smith (in the Chair); Councillors P Carpenter, Candon, Flaxman-Taylor, Grant, P Hammond, Jeal, Myers, Wainwright, Wells, Williamson, B Walker & A Wright

Ms K Sly (Finance Director), Ms C Whatling (Monitoring Officer), Mrs K Blakemore (Strategic Director), Mrs P Boyce (Strategic Director), Mr S Brabben (Revenue & Benefits Service Manager), Mrs M Lee (Head of Customer Services), Mr J Wilson (Head of Environment & Sustainability), Mr J Wedon (Senior Performance & Data Protection Officer), Mr C Silverwood (Director of Operational Services), Mr M Brett (IT Support), Mrs S Wintle (Corporate Services Manager) & Mrs C Webb (Democratic Services Officer).

01 APOLOGIES FOR ABSENCE

Apologies for absence were received from the Chief Executive Officer.

02 DECLARATIONS OF INTEREST

There were no declarations of interest declared at the meeting.

03 MINUTES

The minutes of the meeting held on the 27 September 2022 were confirmed subject to the following amendment :-

Item 6 - The wording it was hoped - be added following the wording the Chairman assured Members that.

04 FORWARD PLAN

Members were advised of an item to be added to the Forward Plan - Local Plan Initial Consultation, would be added to the Forward Plan and be brought to the December meeting.

Members noted the contents of the Forward Plan.

05 FINAL DRAFT OPEN SPACE SPD

Members received and considered the Principal Strategic Planner's report which asked Members to consider endorsing the Final Draft Open Space SPD for consultation.

The Principal Strategic Planner reported that the Open Space Supplementary Planning Document (SPD) was a supporting planning guidance document that would explain when on and off-site provision of open space would be required and how much off-site provision and maintenance would cost.

It was advised that the requirement for new residential development to provide open space was already set out in Policy H4 of the adopted LPP2. This SPD would help developers to meet such requirements.

It was reported that the document had been supported by evidence set out in the Open Space Needs Assessment and Playing Pitch and Outdoor Sports Strategy to identify which parts of the Borough were in need of open space

The Principal Strategic Planner advised that an initial consultation had already taken place to consider the content of the SPD. Some relatively minor changes had been made to the document following this. A consultation statement was appended to the report setting out how comments had been considered.

Members noted that the Local Plan Working Party had considered and endorsed the SPD to be considered by the Policy and Resources Committee on the 18th October.

It was advised that as an SPD, the final draft document must be consulted along with screening for Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA). Subject to endorsement the SPD could be consulted over a minimum of 4 weeks, any subsequent final changes made, and the document would be presented again to this Committee for adoption (Feb/Mar).

RESOLVED :

That Committee endorsed the final Final Draft Open Space SPD for

consultation.

06 COUNCIL TAX SUPPORT SCHEME 2023/24

Members received and considered the Head of Customer Services Report.

The Head of Customer Services advised Members that the report sought endorsement on the recommendations for the 2023 Local Council Tax Support Scheme.

The Head of Customer Services referred Members to the Committee report of the 12th July which sought permission to commence consult in relation to the next years Scheme. The consultation had run for a 12 week period and was based around retaining the existing scheme. Members were advised that limited responses to the consultation were received, however, the results were included at Appendix 1 for information.

It was advised that the estimated costs and funding of the scheme was outlined in section 5 of the report and Members were asked to endorse the recommendations as outlined in section 7 of the report. Members were asked to note that the 2023 scheme would be subject to Full Council Approval.

RESOLVED :

That Committee endorse the recommendation to continue with the existing scheme for 2023/24 which is subject to Council approval - a maximum award of 91.5% of the Council Tax Liability for Working Age.

07 COUNCIL TAX BASE 2023/24

Members received and considered the Revenues and Benefit Service Manager's report.

The Revenues and Benefit Service Manager reported that the Council Tax base was a technical calculation that must be formally set each year. It is the first stage of the Council Tax setting process that will be finalised once the budgets have been agreed

For the purposes of this report the Local Council Tax Support Scheme had been estimated for maximum award of 91.5% for working age claimants.

It was advised that the normal non-collection rate used is 1.75%. However, for this year the non-collection rate had been estimated as higher than normal due to the national cost of living issues at 2.1%.

The calculation of the 2023/24 tax base totalling 29,851 showed a positive growth on prior year of 507.

The report asked the Committee to endorse the calculation of the 2023/24 tax base totalling 29,851 as shown in Appendix A. This was the total number of domestic properties in the Borough using band D as the average property band which is to be

approved by Council.

RESOLVED :

That Committee endorse the calculation of the 2023/24 tax base totalling 29,851 and the estimated tax bases for the Borough and for each parish, as shown in Appendix A of the Revenues and Benefits Manager's report.

08 COUNCIL TAX DISCOUNTS 2023/24

Councillor Grant hereby declared an interest in his capacity as a owner of a large holiday park and advised that he would not take part in the discussion nor vote on this item.

The Committee received and considered the Revenue and Benefits Manager's report.

The Revenue and Benefits Manager reported that under Section 11A of the Local Government Finance Act 1992 Councils have discretion in setting the level of council tax charged in respect of these unoccupied properties and second homes.

Page 2 of the report highlighted the proposed discounts for 2023/24 and the equivalent of what was being charged in 2022/23.

It was reported that under the Levelling up and Regeneration Bill legislation currently going through Parliament the government was proposing further changes to take effect from 1 April 2024

In this legislation Councils will be able to exercise their discretion to

1. commence the Empty Property Premium after 1 year of the property becoming empty (instead of after two years)

and

2. Introduce a premium on unoccupied and furnished properties (second homes) of up to 100%.

It was advised that if the council wished to commence the premium from 1 April 2024, then a determination to do so needed to be at least 1 year before the beginning of the financial year it is to commence.

It is proposed that this premium is introduced from 1 April 2024 onto Class B properties, where the Council already charge 100% Council Tax.

The premium would not be charged on Class A properties such as holiday chalets which have various restricted periods on when they can be occupied

A consideration of empty property discount change to take effect from 1 April 2023 could be to remove the 100% discount for properties that are empty between one day and one month. Many local councils no longer give a discount for this period and Great Yarmouth would be merely coming into line with those councils

The committee were asked to endorse the council tax discounts as shown in Table 2 that will apply for 2023/24.

The committee were also asked, pending the Levelling Up and Regeneration Bill receiving Royal Assent, to approve changes with effect from 1 April 2024 of the following:

1. The Empty Property premium of 100% for properties that have been empty for one year or more commences from 1 April 2024.
2. The Second Homes Premium of 100% for Class B properties (that we currently charge 100% Council Tax) commences from 1 April 2024.

And that with effect from 1 April 2023

3. the 100% discount for empty properties that are empty for one day and up to one month is removed and therefore a 0% discount is applied

Members were advised that recommendation 3 within the report should state 2023 and not 2024.

Councillor Myers asked in relation to Class D properties and whether this now meant that any developer with an empty property would be exempt from any discounts, this was confirmed.

RESOLVED :

That Committee endorse the following :-

(1) The council tax discounts as shown in Section 3.1 which will apply for 2023/24

(2) The Committee the Levelling Up and Regeneration Bill receiving Royal Assent to approve the changes with effect from 1 April 2024 that;

- i) The Empty Property premium of 100% for properties that have been empty for one year or more commences from 1 April 2024
- ii) That the Second Homes Premium of 100% for Class B properties (that we currently charge 100% council tax) commences from 1 April 2024.

(3) The 100% discount for empty properties that are empty for one day and up to one month is removed and so that 0% discount is applied with effect from 1 April 2023.

09 REVENUES WRITE OFF REPORT

Members received and considered the Revenue and Benefits Manager's report.

The Revenue and Benefits Manager advised that the report sought the approval and authorisation of a schedule of individual Business Rate and Sundry Debt accounts where the debt is recommended for write off.

The scheme of delegation for write offs of uncollectible debts means that debts over £10,000 are referred for member approval

Members of the Committee were asked to note that the Committee last considered the Revenues Write off report and schedules of debt in September 2021.

Members were asked to approve and authorise individual write offs as detailed within the Schedule 1 (Business Rates) and Schedule 2 (Sundry Debt) Write Off report.

RESOLVED :

That Committee approve and authorise individual write offs as detailed within the Schedule 1 (Business Rates) and Schedule 2 (Sundry Debt) of the write off report.

10 QUARTER 2 PERFORMANCE REPORT

The Committee received and considered the Information Governance Lead and Data Protection Officer's report which presented an update on performance for the second quarter of 2022/23 (Jul – Sep) where progress is assessed against Targets which are set at the start of the financial year.

The report provided an update on the position of key projects that were linked to the corporate priorities from 'The Plan 2020-2025'. A summary of progress for the suite of key projects and individual highlight reports for each of the key projects were presented in Appendix 1 of this report.

The performance measures gave a comprehensive overview of how the authority as a whole was performing and covers most Council functions.

RESOLVED :

That Committee agree:

(1) That all measures to be monitored during the next quarter.

(2) That all key projects will continue to be monitored over the next quarter with the aim of maintaining a green status and where possible attaining a green status for those key projects which are currently amber.

11 2022-23 PERIOD 6 BUDGET MONITORING REPORT

Members received and considered the Finance Director's report.

The Finance Director reported that the General Fund Summary at Appendix A showed the high-level budget monitoring position at 30 September 2022 of a deficit position of £88k, against the original budget of £208k. (a surplus of £120k).

Whilst it was noted that this was an improved position than that reported at month 4 it did not include the recently approved pay award increase which was more than estimated to result in a £750k impact. The change in relation to this

will be updated within the month 10 report to be presented later in the financial year. It was also advised that it also didn't account for any inflationary increases in utility charges, currently estimated to have a £90k impact but currently not reflected in the position reported under appendix A. With these factors considered the forecast position is just over £1m deficit for 22/23.

The overall position will continue to be monitored in the current financial year and will be reported to Management Team and Members accordingly, proactive work that is underway in the current year includes review of vacant posts and the impact on services where these continue to be held as vacant, in addition to in year savings.

In addition, a review of the reserves has been considered for the work for the Medium-Term Financial Strategy, this will see unallocated reserves released in the current year to provide funding to the general fund reserve.

The capital 2022/23 budget stands at £79.2m as at month 6. Spend is anticipated to increase as the year progresses and currently the forecast spend is £42m with £37.2m to be carried forward into future years. The position will continue to be monitored as projects progress.

The Committee is asked to note the content of the report and the revised forecast for the general fund for 2022/23.

RESOLVED :

That Committee note the content of the report and the revised forecast for the General Fund for 2022/23.

12 MEDIUM TERM FINANCIAL STRATEGY 2023-24 TO 2025-26

Members received and considered the Finance Manager's report.

The Finance Manager advised that the report presented the medium-term financial strategy for 2023/24 to 2025/26.

The strategy is refreshed each year as part of the preparation for the following years budget process and includes the latest high level financial forecasts which have been updated for known spending pressures and commitments.

The report provided members with an update on the forecast gap for the later financial years from 2023/24 which was currently £2.4m increasing to £3 million by 2025/26.

The projections take into account the current spending pressures, most significantly the impact of the pay award from the current financial year, the continued inflationary pressures and the impact of increases to interest rate.

Members were advised that the continued uncertainty around local

government funding did make the budgeting process somewhat challenging. Whilst further announcements were expected later this month the detail for local government finance will not be known until the provisional finance settlement for 2023/24 is received which we can expect later in December.

It was reported that earlier in the year it was announced that there would be a two year settlement, however, this has not been confirmed at this time.

The MTFS includes details of the assumptions for the level of funding anticipated over the period of the strategy, including council tax, government grant and business rates. The Council has been a member of the Norfolk business rates pool in recent years and this report is recommending that it continues to be a member for 2023/24.

The Council must continue to have a business strategy in place which seeks to reduce the future funding gap by delivering efficiencies and additional income to deliver a sustainable budget in the medium to long term.

The strategy priorities are detailed at section 8 of the strategy document and this is included from page 206 of the agenda. These include:

- strategic asset management
- economic and housing growth
- technological investment
- and reviewing the operating model for the Council to ensure that Council is operating in the most efficient way.
- Identification of savings and additional savings.

The MTFS also provides an updated reserves statement, which provides details on the level of reserves held. The use of reserves should only be seen as a short-term funding option as this is not sustainable in the longer term, although it is expected that there will be a requirement to use reserves in the short term to reduce the forecast gap.

The strategy (at section 8.19) has started to allocate indicative targets for savings and additional income to be delivered over the short to medium term, some of these are estimated to be delivered on the back of work that is currently in train. For example where we have identified assets for disposal that will generate capital receipts that can be used to reduce the pressures on the revenue account from financing the capital programme from borrowing.

In addition to these, allocating targets to identify savings and income in the current and next year totalling £1.25million would require a call on reserves in the short term of £1.6m.

In summary before assuming the level of savings to be delivered there is a forecast gap for next year is £2.4m, this is ahead of the detailed budget work that is currently being undertaken by finance and services and before the consideration of savings and additional income opportunities that will be brought forward for approval as part of the budget reports.

The report is recommending the approval of the MTFS, the updated reserves statement and the continuation of the business rates pool for 2023/24, these are included on page 192 of the agenda.

Councillor Wainwright reported that the MTFS was not good news for the residents of the borough.

RESOLVED :

That Committee recommend to Council :-

- 1) The updated Medium Term Financial Strategy (MTFS) and the key themes of the business strategy as outlined at Section 8;
- 2) The revised reserves statement as included at Appendix A to the MTFS;
- 3) Continue with the business rates pool for 2023/24 subject to the finalisation of the forecasts for 2023/24 and the outcome local government finance settlement, to delegate authority to the Section 151 Officer in consultation with the Leader to approve.

13 GREAT YARMOUTH NORSE (GYN) REPORT

The Chairman reported that this item had been removed from the agenda for this evenings meeting.

14 GREEN FLEET STRATEGY (2022-2032)

Members received and considered the Director of Operational Services and Head of Environment and Sustainability's report which provided members with a proposed Green Fleet Strategy which spans the Borough Council's service vehicles and those of the new wholly owned company Great Yarmouth Services (GYS) Limited. In doing so the report set out how the Council will invest in its operational fleet driven by available and emerging low carbon technologies.

The report also asked Members to support an investment and replacement programme to create a new green fleet with a significant reduction in carbon emissions by way of available procurement frameworks. The early adoption of a more sustainable fleet will ensure the Council moves towards in line with its net zero target by 2035.

Members received a presentation from the Director of Operational Services and Head of Environment and Sustainability.

Councillor Grant commented with regard to Bio-Methane and Caister Sewer works, and asked whether any form of communication had been held to discuss a possible opportunity of partnership working with NCC, Caister Sewer Works and GYBC. The Head of Environment and Sustainability advised that he had not been approached by the County Council to discuss this matter.

Councillor Grant further asked for clarity around what the requested £50,000 would be

spent on, it was advised that this had been an estimated amount based on the SLR study and had been set aside to assess the current depot's ability to deliver the future needs of the service, Councillor Grant asked if the sight was deemed unsuitable whether this site would be utilised for housing, the Head of Environment and Sustainability confirmed that if the site was to be deemed unsuitable then alternative uses would be looked at.

Councillor Wells thanked the Officers for the work that had gone in to delivering the report and strategy.

Councillor Myers asked with regard to HVO and sought clarification of where UK supplies would come from and whether they would come from a sustainable source. The Head of Environment and Sustainability confirmed that the current supplier was Ricks and advised that Officers would continue to do their best to get supplies from the most sustainable source.

Members were advised that there had been a slight change to the recommendations within the report, in that recommendation 5 (to become recommendation 6 due to two recommendation 5 within the report) be considered as follows :-

a) Agrees to release of the previously agreed capital budget allocation of £1.13million in 2022/23;

b) **Recommends to Council** the addition of an extra £106,000 (due to a cost increase since the budget was agreed last year) in 2022/23 and the allocation of a further capital spend of £1.7 million in 2023/24 for vehicle acquisitions.

RESOLVED :

That Policy & Resources Committee:

1. Agrees the Green Fleet Strategy as set out in this report including the conversion of the whole fleet from diesel to sustainably sourced fuels including Hydrotreated Vegetable Oil (HVO) and electric where possible to achieve immediate carbon savings.

2. Supports the replacement of:

(i) Six Refuse Collection Vehicles (RCV) with the latest Euro 6 vehicles to run on HVO in 2022/23 to deliver frontline operational services via the new GYS Limited company.

(ii) Six Refuse Collection Vehicles (RCV) with the latest Euro 6 vehicles to run on HVO in 2023/24

(iii) One Refuse Collection Vehicle (RCV) with electric Refuse Collection Vehicles (eRCV) in 2023/24.

(iv) One panel van with an electric equivalent in 2023/24.

3. Agrees that up to £20,000 per vehicle can be made available to retrofit emerging fuel technology including hydrogen within the fleet of Euro 6 RCVs to reduce fuel and associated carbon emissions further. Subject to the success of the initial trial, there would be an outlay of £20,000 for one vehicle retrofit funded from the invest-to-save reserve.

4. Agrees to release £50,000 from invest-to-save for a feasibility study to assess the current depot's ability to deliver the future needs of the service.

5. Agrees to investigate options for members and the workforce which encourage greater active travel including use of public transport, lift-sharing and salary sacrifice schemes which enable greater uptake of electric vehicles.

6. (a) Agrees to the release of the previously agreed capital budget allocation of £1.13million in 2022/23;

(b) **Recommends to Council** the addition of an extra £106,000 (due to a cost increase since the budget was agreed last year) in 2022/23 and the allocation of a further capital spend of £1.7 million in 2023/24 for vehicle acquisitions.

7. **Recommends to Council** to agree to lease all operational vehicles to the new company Great Yarmouth Services (GYS) Limited and delegates authority to the Deputy Section 151 Officer to agree the lease terms.

15 ANY OTHER BUSINESS

There was no other business discussed at the meeting.

16 EXCLUSION OF PUBLIC

RESOLVED :

That under Section 100(A)(4) of the Local Government Act 1972, the public be excluded from the meeting for the following item of business on the grounds that it involved the likely disclosure of exempt information as defined in paragraph 1 of Part I of Schedule 12(A) of the said Act.

17 CONFIDENTIAL MINUTES

(Confidential Minute on this Item)

The meeting ended at: TBC

				ELT Date	Pre Meet Date	Agenda Published	Committee Date
	Policy and Resources Committee						
	22-228	Treasury Management Strategy - Half Yearly review	Finance Director	23/11/22	25/11/22	29/11/22	6/12/2022
	22-191	PSPO No. 2 – Car Enthusiasts	Head of Environment and Sustainability	23/11/22	25/11/22	29/11/22	6/12/2022
	22-107	Coastal Management SPD – Formal Consultation	Strategic Planning Manager	23/11/22	25/11/22	29/11/22	6/12/2022
	22-222	Business Plan GYS	Director of Operational Services	23/11/22	25/11/22	29/11/22	6/12/2022
	22-261	Local Plan Initial Consultation	Strategic Planning Manager	23/11/22	25/11/22	29/11/22	6/12/2022
	22-063	Gorleston Seafront Masterplan	Strategic Director (KB) / Principal Strategic Planning Officer	23/11/22	25/11/22	29/11/22	6/12/2022
	22-271	Asset Management Strategy	Major Projects & Development Director	23/11/22	25/11/22	29/11/22	6/12/2022
	22-278	Spending of developer contributions	Strategic Planning Manager	29/11/22	25/11/22	29/11/22	6/12/2022
	22-280	Parish Support	Finance Manager	29/11/22	25/11/22	29/11/22	6/12/2022
	22-218	Gorleston Clock	Head of Property and Asset Management	04/01/23	06/01/23	10/01/23	17/01/23
	22-256	NPLAW Review report	Monitoring Officer	04/01/23	06/01/23	10/01/23	17/01/23
	22-219	Compulsory Purchase Order	Housing Director	04/01/23	06/01/23	10/01/23	17/01/23
	22-230	Budget Report 2023/24 - GF	Finance Director	25-01-23	30/01/23	31/01/23	07/02/23
	22-231	Fees and Charges 2023/24 onwards	Finance Director	25-01-23	30/01/23	31/01/23	07/02/23
	22-232	Capital Strategy 2023/24	Finance Director	25-01-23	30/01/23	31/01/23	07/02/23
	22-233	Investment Strategy 2023/24	Finance Director	25-01-23	30/01/23	31/01/23	07/02/23
	22-234	Treasury Management Strategy - 2022/23	Finance Director	25-01-23	30/01/23	31/01/23	07/02/23
	22-235	Council Tax Setting 2023/24	Finance Director	25-01-23	30/01/23	31/01/23	07/02/23
	22-192	PSPO No. 3 - Dogs	Head of Environment and Sustainability	15/2/23	06/03/23	07/03/23	14/03/23
	22-239	Period 10 Budget Monitoring Report - GF	Finance Director	01/03/23	06/03/23	07/03/23	14/03/23
	22-036	Revenues Write off Report	Head of Customer Services	01/03/23	06/03/23	07/03/23	14/03/23

URN: 22-063

Subject: Gorleston Seafront Masterplan

Report to: Executive Leadership Team – Wednesday 9th November 2022
Policy & Resources Committee – 6th December 2022

Report by: Kate Blakemore, Strategic Director
Kim Balls, Principal Strategic Planning Officer

SUBJECT MATTER

This paper presents the final Masterplan for Gorleston Seafront

RECOMMENDATION

That Policy and Resources Committee :-

(1) Adopt the Gorleston Seafront Masterplan included in Appendix 1.

1. BACKGROUND

- 1.1 The aim of creating a seafront masterplan is to set out a commercially realistic and flexible framework for the development for Gorleston's seafront. Its purpose is to guide new investment so that projects are not only individually delivered to a high quality, but also that they add up collectively to more than the sum of their parts. The outcome of the full implementation of this masterplan will be to build confidence and the business case for future inward investment and development, as well as supporting potential funding bids.
- 1.2 Members of the Council's Policy and Resources Committee agreed to the creation of this masterplan and the establishment of a Member Working Group to develop proposals for Gorleston seafront. This paper presents the final masterplan in relation to Gorleston seafront.

2. MASTERPLAN DEVELOPMENT PROCESS

- 2.1 Supported by the Gorleston Members Working Group, officers have developed a seafront masterplan for Gorleston. In developing this masterplan, public consultation was undertaken during 2021 on the draft vision and aims, and in 2022 on a complete draft of the masterplan. Nearly 1,300 people have been engaged through the consultation process, generating over 6,000 individual responses.
- 2.2 This masterplan document outlines a clear vision for Gorleston seafront along with objectives which will be considered when decisions are made by the Council. The plan will provide a framework to guide both public and private sector investment, ultimately seeking to enhance all that Gorleston seafront currently has on offer.

3. GORLESTON MASTERPLAN OVERVIEW

3.1 In presenting the vision and objectives within this masterplan, it then considers several themes in which these objectives fall. These themes are:

- Conservation
- Wayfinding & Local Enhancements
- Sustainable Transport & Parking
- Accessibility
- Leisure Attractions
- Environmental Standards
- Events

3.2 Within each theme explored, clear actions are presented to ensure the objectives within this masterplan are taken forwards and delivered against. For ease, a summary of all masterplan actions has been provided in Appendix 2 of this report.

4. FINANCIAL MATTERS

4.1 Whilst this paper requests no additional funding, Members are asked to note that to deliver some of the aspirations of this plan such as undertaking feasibility work in relation to the parking theme within the masterplan, there may be a future requirement for funding to be assessed on a case-by-case basis.

4.2 Alongside this any business cases to progress projects will need to consider how investments would be offset in terms of future revenue streams.

5. LEGAL MATTERS

5.1 Whilst the masterplan will have no formal legal status it can be used as a framework for how Gorleston seafront can be improved and conserved in the future and used when making decisions about this area.

6. RECOMMENDATION

6.1 It is recommended that Policy and Resources Committee adopts the Gorleston Seafront Masterplan included as Appendix 1.

Areas of consideration e.g. does this report raise any of the following issues and if so, how have these issues been considered/mitigated against?

Areas for consideration	Comment
Monitoring Officer Consultation:	Through ELT on 9 th November 2022
Section 151 Officer Consultation:	Through ELT on 9 th November 2022
Existing Council Policies:	Local Plan Part 1: Core Strategy, Local Plan Part 2, Corporate Plan

Financial Implications (including VAT & tax):	Considered in the report
Risk Implications:	Considered in the report
Equality Issues/EQIA Assessment:	None - considered through the public consultation
Crime & Disorder:	n/a
Every Child Matters:	n/a

GORLESTON

SEAFRONT

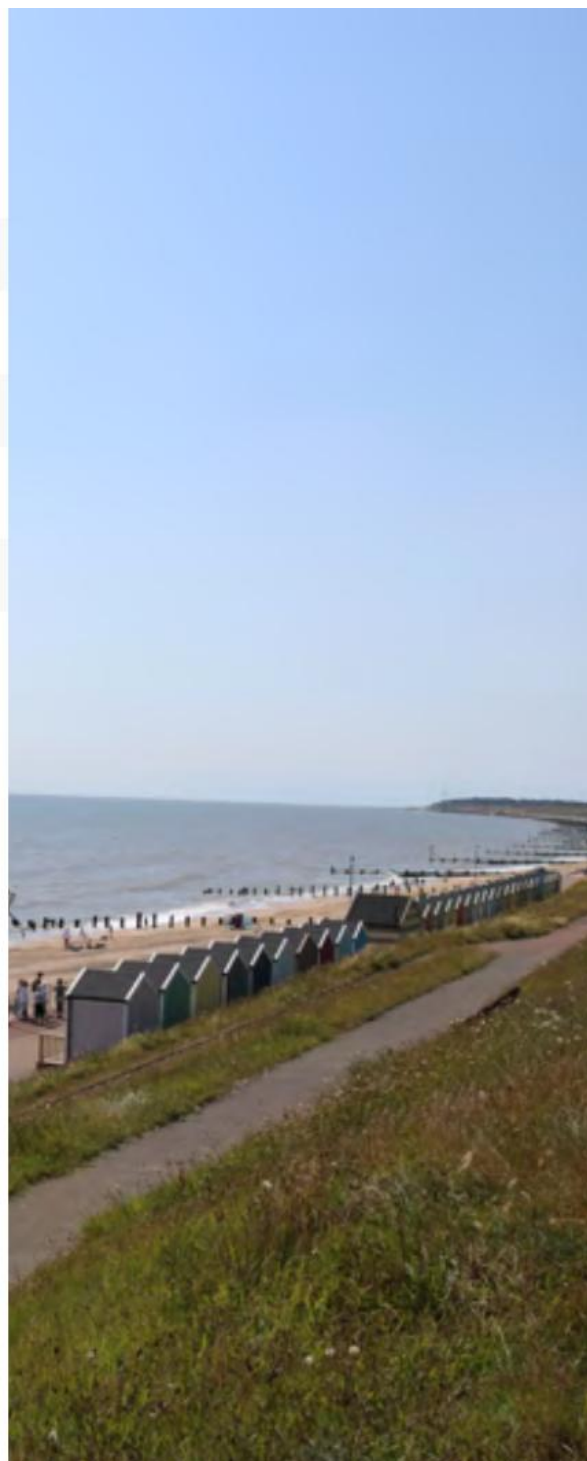
MASTERPLAN

This masterplan document has been prepared by Great Yarmouth Borough Council to set out an aspirational framework for Gorleston's Seafront, with the purpose of guiding new investment and improvement opportunities that help protect and enhance the uniqueness of the area, now and for the future.

This document, developed in collaboration across the Council's departments and with valuable input from its elected members and the local community, complements the Council's strategic priorities in its corporate and development plans. When completed, it will help guide future decisions that will strengthen the area's tourism, cultural and heritage offer, and provide for a high-quality and sustainable environment shared by visitors and residents alike.

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Introduction

Gorleston is situated on Norfolk's east coast between Great Yarmouth and Lowestoft and is home to a population of about 26,000 people. Gorleston has a long history of port-related industry, including fishing and shipbuilding, and it is a very popular seaside resort.

The seafront is known for its fine, sandy beach with several facilities which are perfect to support family seaside holidays, with a lesser amount of the flashiness that Great Yarmouth offers. Gorleston has always been a seaside destination, being fashionable and popular in both the Victorian and Edwardian periods, however like most seaside resorts it requires continued nurturing and enhancement to maintain its uniqueness and special quality now and into the future.

Through both the Council's Corporate Plan (The Plan 2020-2025) and Local Plan, we are focused on growing an all-year-round tourism economy at resorts such as Gorleston and recognise the importance of nurturing Gorleston's cultural and heritage offer.

Through our Sustainability Strategy, the Council is committed to understand and address the borough's present environmental challenges, to ensure a thriving and sustainable borough for the future. It is therefore vital that we support the long-term future of the seafront in a manner which embraces reductions in carbon emissions, supports nature recovery, and provide opportunities for local people to make sustainable choices.

This masterplan, therefore, sets out a framework of how Gorleston seafront can be sustainably improved and conserved. It makes recommendations on the possible things that could happen along the seafront, incorporating the feedback the Council received as part of its public consultation of its draft masterplan proposals.

This plan outlines several themes which form part of this framework, these are:

- Conservation
- Wayfinding & Public Realm
- Sustainable Transport & Parking
- Accessibility
- Leisure Attractions
- Environmental Standards
- Events

The study area for the masterplan encompasses the quayside and seafront areas along Brush Quay and the Pier, and extends south along the Lower Esplanade, taking in the Gorleston Cliffs and Marine Parade in parallel. It also includes the historic terraces set behind the seafront area, bounded by Cliff Hill and Pier Walk as these form part of the wider local character of the seafront area. The masterplan study area also partly includes and abuts westwards into the main residential areas of Gorleston, where the streets provide important walking and driving connections between the town and seafront area. A plan denoting the extent of the masterplan is provided in Figure 1.

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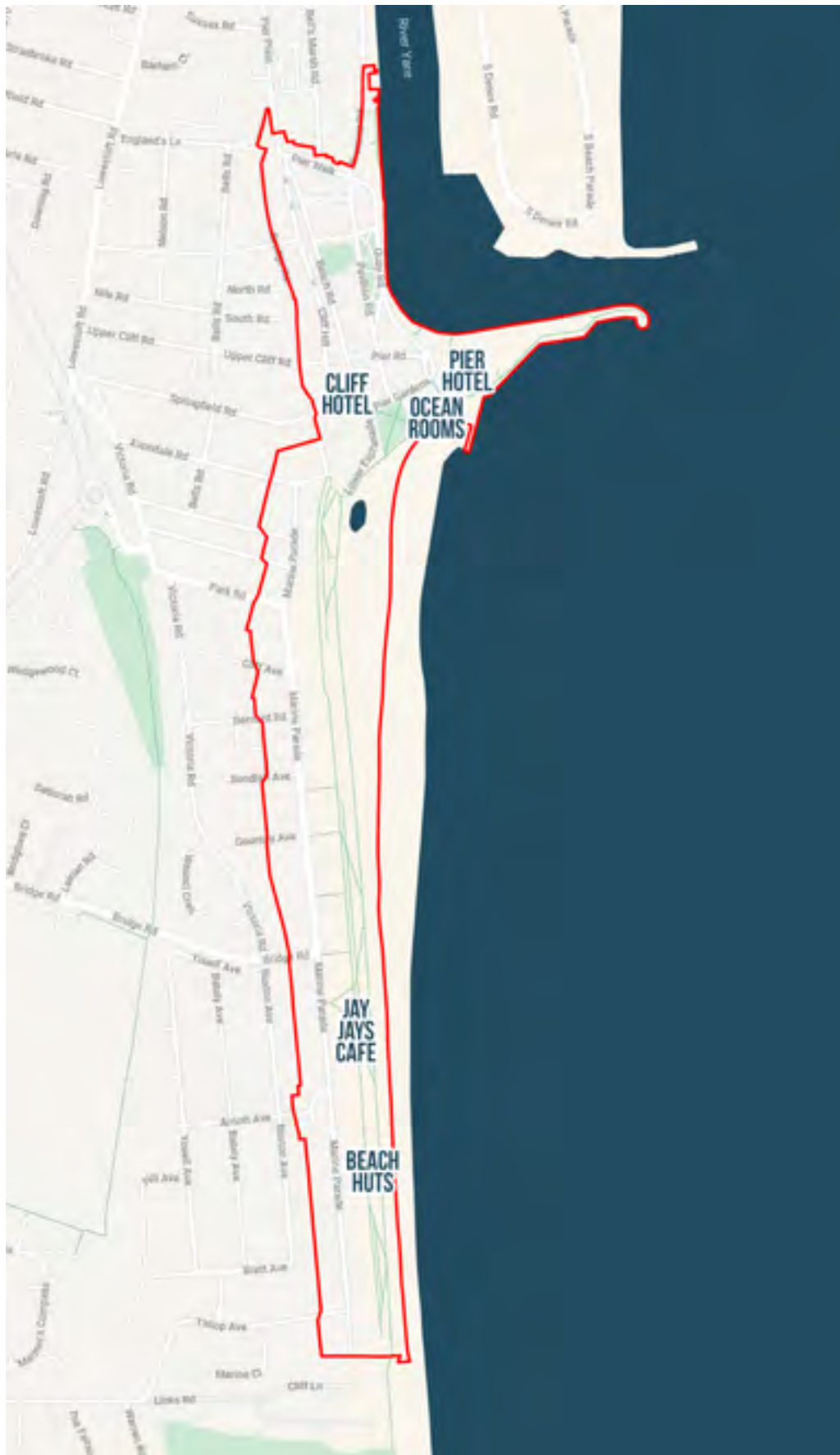
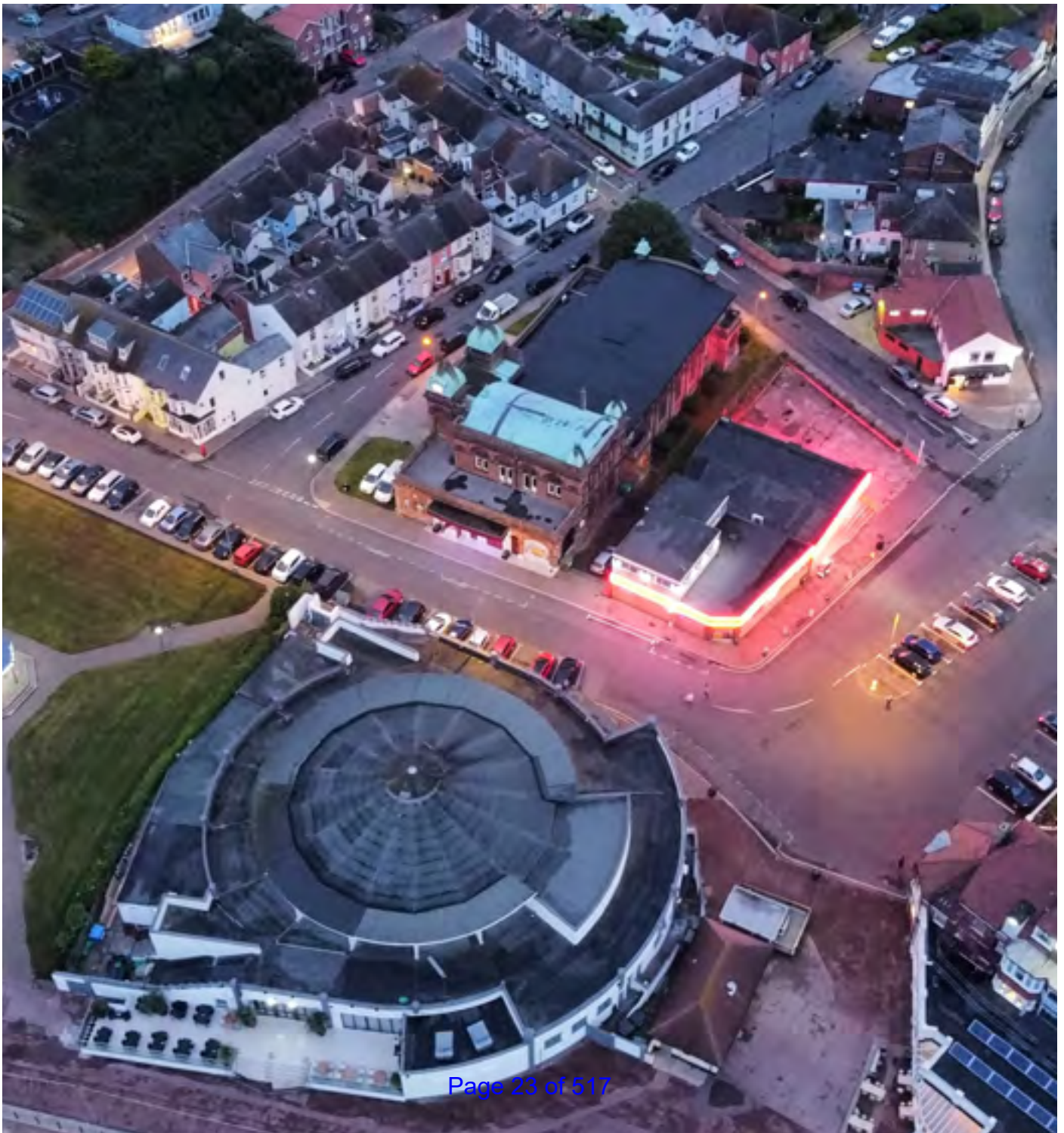


Figure 1 - Master plan study area – outlined in red.

Vision

Corleston seafront is a place of great natural and architectural beauty, providing residents and visitors alike a place to enjoy, whether it's a quiet evening walk or a livelier day spent on the beach in the summer sun. This masterplan has been developed to protect and enhance this area, from safeguarding the stunning Edwardian architecture to providing the opportunity for additional unique seafront attractions and cultural activities in support of the local economy, with the overall aim of sustaining this distinctive environment whilst providing greater opportunities for people to enjoy this place all year-round.



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Objectives

Conservation

1. To safeguard the Edwardian character of the area, including key buildings and features such as the Gorleston Pavilion Theatre and promenade.

Wayfinding & Local Enhancements

2. To review wayfinding and signage to improve access and rationalise street clutter.
3. To improve the public realm around the beach, car parks, pier and nearby streets.

Sustainable Transport & Parking

4. Ensure that transport routes to and from the seafront areas reduce congestion, support opportunities, and encourage the use of sustainable modes of transport where possible.

Accessibility

5. To enhance the existing infrastructure to encourage more visitors and residents to the beach, improving beach access for people with disabilities.

Leisure Attractions

6. To review both provision and management of existing amenities alongside expanding the availability of attractions to animate year-round footfall.

Environmental Standards

7. To continue to maintain a high standard of cleanliness in the area, whilst considering environmental sustainability opportunities such as encouraging greater biodiversity.

Events

8. Explore the potential for enhanced arts and culture opportunities.
9. To better utilise the clifftop, building on the success of the cliff top gala and to increase the opportunity for outdoor physical activities within this area, aligning any future offers with the outdoor play and open spaces review currently in progress.

Public Consultation

The masterplan has been shaped through an iterative process, engaging community stakeholders, local businesses and the general public.

Between August and September 2021, the Council undertook public consultation on the masterplan's draft vision and objectives, in addition to seeking to better understand the seafront's strengths, weaknesses and potential opportunities for development and enhancement.

The consultation generated over 1,500 individual responses and demonstrated significant support for the masterplan's general vision and objectives but also suggested several improvements which were taken into further consideration when finalising the masterplan. The commonly raised points during the consultation are summarised below:

What do you like best about Gorleston's Seafront?

- Beach
- Lack of commercialisation, in contrast to Great Yarmouth Seafront
- Clean, tidy and uncluttered
- Tranquillity, unspoiled, peaceful environment
- Free car parking

What do you like least about Gorleston's Seafront?

- Small number of bins and appearance of waste and litter
- Lack of disabled beach access
- Insufficient number of toilets facilities, particularly at the southern end of the promenade
- More attention needed to maintain the natural and built environment

What would you change about Gorleston Seafront if you could?

- Nothing. Keep it the same.
- Improvements to amenities and facilities e.g. bins, disabled beach access and toilets, water for beach showering and drinking
- Better relationship between parking availability and car parking free area around the shops/pier area
- Improvements to the food variety and extent of offer
- On-going maintenance of the natural and built environments

Other commonly raised general comments

- Recognising the special offer Gorleston has in contrast to Great Yarmouth
- Prioritising natural space over commercialisation
- Making better use/enhancement of the seafront's existing key assets e.g. beach, Edwardian heritage, its tranquillity and simplicity of public realm

Further public consultation was undertaken between August and September 2022 to encourage feedback and help refine each of the final masterplan's proposed actions.

As this masterplan has been prepared at a high-level, the Council may consider undertaking more detailed future engagement with the public and other key stakeholders, as appropriate, to help progress the individual masterplan Objectives, Actions and potential options for future development.

Masterplan Objectives

Conservation

Gorleston was a thriving fishing community before the growth of seaside tourism, these combined histories have helped to shape a special character and sense of place.

Its most significant asset and one which dominates the character is the unspoilt beach which together with the urban setting reinforces the sense of an archetypical British seaside town.

The seafronts evolution in terms of the built environment and public realm has been relatively restrained, resulting in an interesting and charming townscape of exceptional quality. This is recognised through its designation as a conservation area and several key listed heritage assets.

The area is important historically and for the mix of interesting buildings, its scale, the materials used in construction, and its fundamental relationship with the sea and how this relationship forged the town and continues to shape it.

Throughout the area there is a spatial quality and strong visual evidence of the historic development which provides an interesting visual layering. The overall character is genteel and with an Edwardian respectability fringed with a strong sense of a fishing and maritime tradition.

Historically the harbour and its activity defined the town and now contribute to a quality and interest especially in terms of its history and historic development, spatial quality and collection of buildings.



Gorleston Beach – photograph taken 1850-1900s. Historic England

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There are many interesting buildings, built forms and open spaces, which all contribute to a historic and attractive environment framed by sea and river. The Pavilion Theatre, in brick and terracotta, 1900, by J W Cockrill and the Lighthouse, built 1187, also in brick, are both Grade II listed buildings. The Pier Hotel of 1893 was built on the site of the old public house, the Anchor and Hope, much favoured by the beachmen. In 1896, the Beach Gardens were set out in front of the Pier Hotel, with a bandstand, and a wooden promenade was built between the gardens and the beach. In 1939, the Gardens became the site of the Floral Hall, now the Ocean Room, with its echoes of seaside art deco. The rest of the site became the former swimming pool, now gone, and the site has been restored to gardens, with a new bandstand to be erected in 2008. All four buildings are mentioned in Pevsner's "Buildings of England".

There is boating pond (1926) and terracotta-faced shelters from 1903, and Cliff Hill which is an ensemble of charming houses and cottages, with views across to the harbour that was first inhabited by beachmen and pilots in the early 19th century.

To support and preserve the unusual character of the seafront and its conservation area status there is a need for limited interventions to some of the key historical buildings, for example the Pavilion Theatre, to help reinforce the existing quality such as building repairs and enhancement, and a limited pallet of high-quality materials for landscaping and planting schemes.

Buildings are a key element in creating the distinctive character and although a number have statutory protection through listed building designation others may be vulnerable to inappropriate change. Options to protect character include the potential imposition of Article 4 Directives which remove certain permitted development rights and the greater use of enforcement powers under current legislation. In addition, the creation of area-based grant schemes through seeking external funding and an emphasis on homeowners around routine maintenance and repair are further options for consideration.

Action: *The character and significance of Gorleston seafront, together with opportunities for enhancement, and a thorough assessment of the historic built environment is set out in the Gorleston Conservation Area Character Appraisal. The appraisal provides an in depth historic development of the area and analytical survey of heritage assets. It is contained as an appendix to this document.*

The Gorleston Seafront masterplan should be read in conjunction with emerging design guides being produced by the Borough Council covering aspects of the built environment such as shopfronts, public realm and the appropriate repair of historic buildings.

The Council will seek to liaise with the range of landowners and operators of key historical and cultural buildings along the seafront to support their continued restoration or future enhancement.



Wayfinding & Local Enhancements

Wayfinding

Wayfinding often consists of maps, signs and other visual clues which help guide people to their desired destinations. As well as providing directions to tourism and amenities, good wayfinding can also promote health and wellbeing, assist with making dementia-friendly spaces and promote inclusivity and accessibility for all users within those spaces.

Within the seafront area, the common wayfinding methods are reliant upon existing highway signage, rather than being at the pedestrian scale. This leads to some of the seafront destination journeys being taken via the private car as opposed to other more sustainable and healthy modes such as walking and cycling, particularly from Gorleston's high street which provides a range of community and shopping options from a short distance away.

The Council has already undertaken some work which recognises the relationship between Gorleston's high street and the seafront at this pedestrian scale, identifying this general area as a 'walking zone', and highlighting potential improvements to signage within the Great Yarmouth Local Cycling and Walking Infrastructure Plan 'LC WIP' (2022).

Action: Moving forward, it will be necessary to undertake an audit of existing wayfinding and signage between Gorleston's town centre and seafront areas to identify what key community, tourism and leisure attractors are between them, and how best to interpret their walking and cycling legibility both across the masterplan area and further afar. Any new potential wayfinding or signage solution will need to be considered and designed in conjunction with emerging design guides being produced by the Council to ensure any solution responds sensitively and appropriately to the area's unique character.



Local Enhancements

The Gorleston Pier area is situated eastward of Quay Road and Pier Gardens, comprising a mixture of public and commercial uses including gardens and open space along the southern end of Brush Quay, the Pier Hotel, Doggy Diner café, visitor car parking, Sailing Club and the Gorleston HM Coast Guard lookout at the end of the Pier.

It is a well-used area for casual walkers and anglers along the harbour mouth, and for visitor parking, close to the beach and adjacent to many of the main attractions and seafront amenities including the Ocean Rooms, Pavilion Theatre and Ocean Bay amusement centre. Whilst locally popular, the area would benefit from some targeted improvement to the quality and setting of the built environment, and many of the key buildings within it. However it is recognised that such change can be difficult to co-ordinate due to the mixture of private and public ownerships within the area.

Action: *The Council will seek to liaise with the different landowners in the area to facilitate environmental improvements and a revitalised focus in the area. This may include repairs to fencing, hardstanding areas, landscaping improvements around the Pavilion Theatre, and the potential introduction of new lighting and public realm facilities within the area.*



Sustainable Transport & Parking

Supporting the expansion of infrastructure that facilitates low carbon transport and active travel such as cycle paths, bike parking and e-bike charging points will ensure Gorleston seafront areas play an inclusive role in the UK's Decarbonising Transport: A Better, Greener Britain (2021).

Sustainable Transport

The seafront area is generally well served by access to different modes of sustainable transport. Bus service provision is mostly concentrated along Marine Parade, providing regular services to Gorleston's High Street, the James Paget University Hospital and further on to Great Yarmouth and Lowestoft.

Owing to its historic seafront location the area around the Pier, Lower Esplanade, Pavilion Road and Quay Road is relatively underserved by direct public transport facilities, however the area remains only a short walk to the nearest bus stops along Marine Parade and Avondale Road (via the Gorleston Cliff walkways), and only a 10-minute walk from Gorleston High Street where most of the local public transport facilities interchange. Norfolk County Council are currently undertaking a review of the bus stop facilities and service provision within the area which may lead to an improvement in both facilities and frequency of the local bus services. Additionally, the Borough Council's Local Cycling & Walking Infrastructure Plan (LCWIP) identifies the need for potential footway enhancements within the area to improve better access to these sustainable options.

For cycling, the seafront area is connected to Great Yarmouth and Lowestoft via the Sustrans National Cycle Network (NCN) 517. This follows a route through the masterplan area via Riverside Road, Quay Road, Pier Gardens and on to the Lower Esplanade before joining Marine Parade via The Ravine and forms part of the normal road carriageway (excluding the traffic-free segment along the Lower Esplanade). Cycling is permitted along the entire length of the Lower Esplanade (from the north), however there is no cycling access from the south, therefore cyclists must either dismount and wheel their bikes up/down the cliff paths or use The Ravine.

The masterplan area also sits within an area that forms part of the Council's E-scooter trial. This is providing an alternative sustainable transport option for residents and tourists moving around the Great Yarmouth, Gorleston and Bradwell area, helping to replace the car for shorter-distance travel journeys. Locally, the trial has demonstrated that the Gorleston seafront area is highly popular among E-scooter riders with many circular journeys taken between the High Street, Lower Esplanade and Marine Parade. Though the E-scooter trial is due to continue until the end of November 2022, the Council are keen to support the principle of E-scooters in the area on a more permanent basis.

Considering the range of sustainable transport options that help serve the connectivity of the seafront, the area would benefit from the installation of Electric Vehicle (EV) charging points, pods or other electronic charging apparatus. This action aligns with the Council's Sustainability Strategy, to reduce carbon emissions and increase sustainable travel choices. It also supports the Government's Decarbonising Transport: A Better, Greener Britain (2021) aimed at supporting the UK's commitment towards a zero emission cars, vans, motorcycles, and scooters.

Action: By having regard to the conclusions of the LCWIP and outcome of the E-Scooter trial, the Council will consider the prioritisation and implementation of footway and cycling enhancements, and EV charging apparatus within the masterplan area. This will help improve the general inter-connectivity between the seafront and high street areas and increase the availability and options for both residents and visitors to access sustainable transport modes in the seafront area.



Parking

The seafront is divided into two distinct areas of Riverside/Quayside and Lower Esplanade with direct access to the beach and the cliff top along Marine Parade which travels the length of the golden sands of the beach, with stunning panoramic views and easy access to the promenade and amenities the seafront has to offer.

The Riverside and Quay Road can be accessed from the main road (A47/A143) and surrounding areas with popular routes via Riverside Road or from the High Street onto Englands Lane/Pier Plain and Pier Walk. There is a high proportion of parking available to residents and visitors to this popular seafront area, with a mixture of free off-street and on-street provision as well as some free on-street time restricted bays. Brush Quay off-street carpark has provision for 115 spaces, with on-street provision, including some time limited bays of over 130 spaces along Quay Road, Pier Gardens.

The on-street provision includes coach bays on Pier Gardens/Quay Road to accommodate visitors arriving and departing from the Hotels in the area, the Pavilion Theatre and the Ocean Rooms.

Lower Esplanade has 90 on-street time limited bays with an additional 4 reserved for disabled use only and provides easy parking close to the seaside amenities and golden sands.

The cliff top, Marine Parade can be accessed by the main A47 taking the popular route of Park Road leading on to Marine Parade. This area again has a high proportion of free off-street and off-street parking available to residents and visitors to the area. The Marine parade off-street car park is located at the Southern end of Marine Parade with 78 bays with additional on-street provision of over 250 spaces.

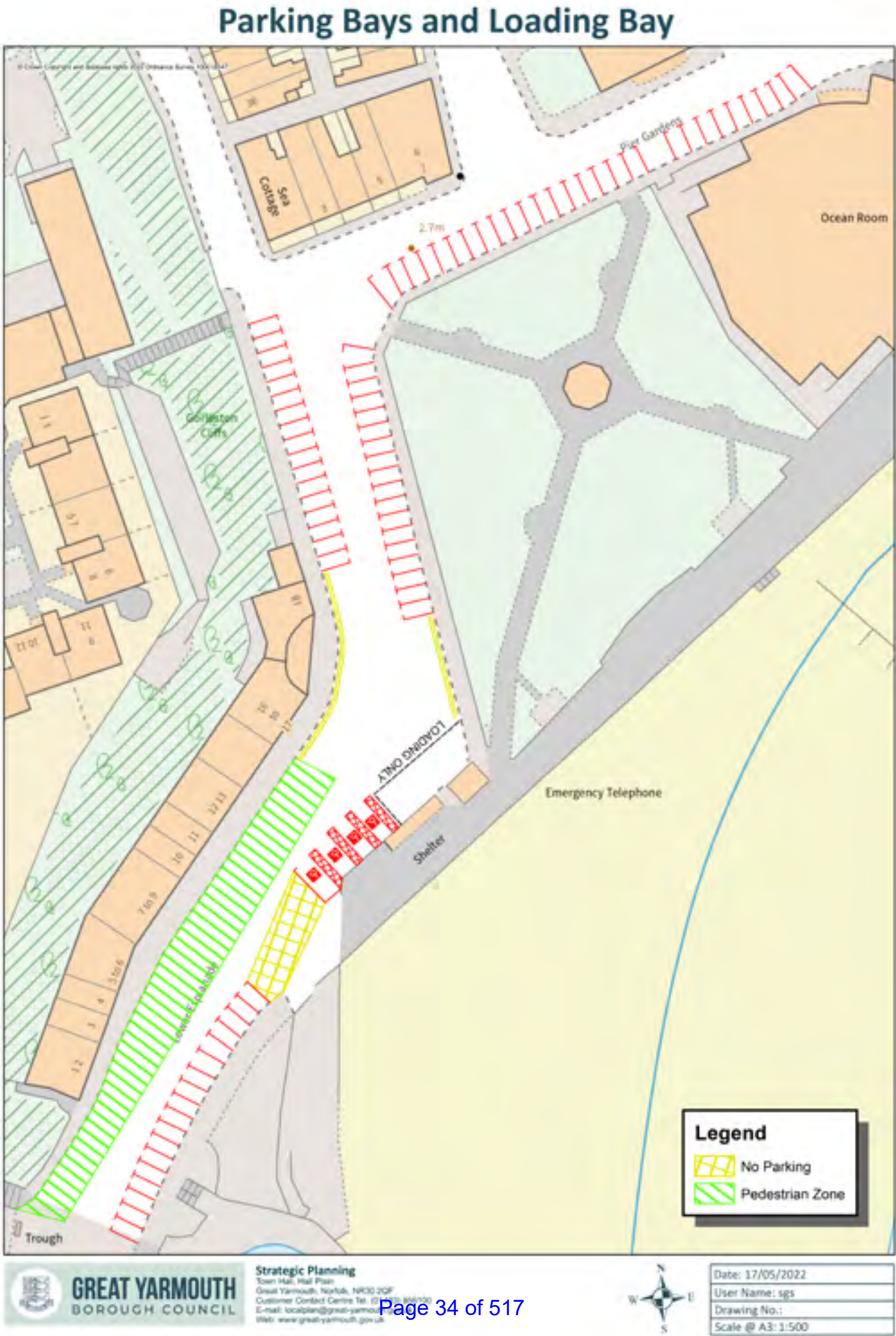
Whilst parking in both areas of the seafront is noticeably seasonal, it is also a popular destination for residents of the borough and further afield visitors through the off-peak months.

Promenade & Lower Esplanade

The Lower Esplanade is the gateway to the local amenities, promenade and beach and is a popular location for visitors arriving by car looking for parking with proximity to the area. There is a mixture of restaurants, cafes and shops requiring access for deliveries and utilities. Through the summer period, this area is busy with a high volume of visitors and residents arriving by car and manoeuvring around the area. In addition, the area is also busy with pedestrians walking across the lower esplanade going between visiting the restaurants/café and shops and beach or promenade. There is an opportunity to relieve some congestion experienced through the high peak months which impact both pedestrians and vehicle users.

There is already a substantial amount of parking in the area with 119 spaces in the Lower Esplanade and Pier Gardens, 27 of which have been temporarily out of access with the placing of the planters to create a pedestrianised area. There is an opportunity to expand this area by either extending the current planters or using other types of barriers/demarcation and still retain some availability of parking near the beach and amenities which will be a benefit to residents and visitors and the businesses in the area. By retaining parking bays along the eastern side of the lower esplanade leading to the promenade, the removal of parking bays on the western side can create a pedestrianised area with a safe place for people to be with routes to access all the amenities, beach, and promenade. By removing the current coach bay on the lower esplanade to incorporate additional car park spaces and by the creation of 2 additional spaces on the east side of the Lower Esplanade/Pier Gardens, 84 car park spaces remain in this area.

Action: To consider options and feasibility to extend the Public Realm of the seafront and create more open space, extending the playful area of the beach and promenade with attractive landscaping and street furniture enabling safe access for pedestrians to the beach and promenade.



Accessibility

The Council is committed to making sure that accessibility is considered throughout its operations. As such an accessibility report was commissioned to better understand the potential opportunities and barriers to improving accessibility of Gorleston Seafront. This report has been used to inform the actions presented below.

Action: As a result of this work the following actions are recommended:

- Consideration needs to be given to provide additional accessible parking bays in the Lower Esplanade carpark and to improve the existing bays to ensure they meet Part M of the Building regulations and BS8300:2018
- Engagement with existing businesses to provide advice on how access to their venues could be improved in terms of accessibility
- Put in place signage on the pathway slopes highlighting their gradients and potential hazard to wheelchair users
- Review pathways throughout the seafront area to ensure they remain well maintained and where funding allows undertake capital works to ensure they are made safer for all user groups
- Improve signage to existing changing places toilet facility near the Ocean rooms, ensuring that there are processes in place to respond to an alarm if raised by users within this facility. Alongside this investigate additional opportunities to increase accessible toilet provision across the wider seafront area
- Implement the use of independent use beach wheelchairs, like the scheme that operates on Great Yarmouth seafront
- Explore leisure activities that can be hosted on the seafront that support all users, such as adaptive cycling; engagement with disability groups and clubs will help develop such opportunities
- Investigate the installation of a fully accessible boardwalk from the lower promenade stretching toward the sea



Leisure Attractions

The Great Yarmouth Corporate Plan (The Plan 2020-2025) and the Local Plan (Core Strategy and Local Plan Part 2) set out the drive for an all-year-round tourism economy at resorts such as Gorleston and Great Yarmouth. Recent investments such as the Splashpad facility has proven popular with families as a destination and is an important new facility for the seafront.

Historically, provision of facilities has been focussed on the Summer Season however, with more visitors during the shoulder season the opportunity to develop services to benefit both users and businesses should be considered for Gorleston.

Concessions

Currently, the concessions (typically kiosks or stands selling goods) offer is very much limited to the lower promenade in Gorleston, with the beach and promenade utilised for a limited number of outlets. Whilst Gorleston is an extremely popular destination, through our consultation it has been identified that some of the offers are limited.

The Council is currently introducing new concession opportunities during 2022 along the Lower Esplanade for small-scale retail and leisure outlets to support the seafront and tourism offer. See Figure 3

In principle, the Council's Local Plan is generally supportive of encouraging new tourism and leisure facilities within the Gorleston seafront area, where these are appropriate in size and to the character of the area. Whilst national planning policy and town centre policies included in the Local Plan seek to direct retail and leisure to town centres, providing such uses are ancillary and complementary to the existing tourism offer which is available at the seafront, such development could be acceptable. The offer at Gorleston's seafront is distinct from that at Gorleston's Town Centre and other local centres within the town therefore further leisure and tourism focussed facilities in this location is unlikely to detract businesses from the town centre.

New, small scale, retail, leisure and food and drink concessions could help bolster the local economy by taking advantage of the large number of visitors who currently visit the seafront. This could also help the resort attract new visitors and day-trippers. Whilst in the town, these visitors could also visit the Town Centre and other

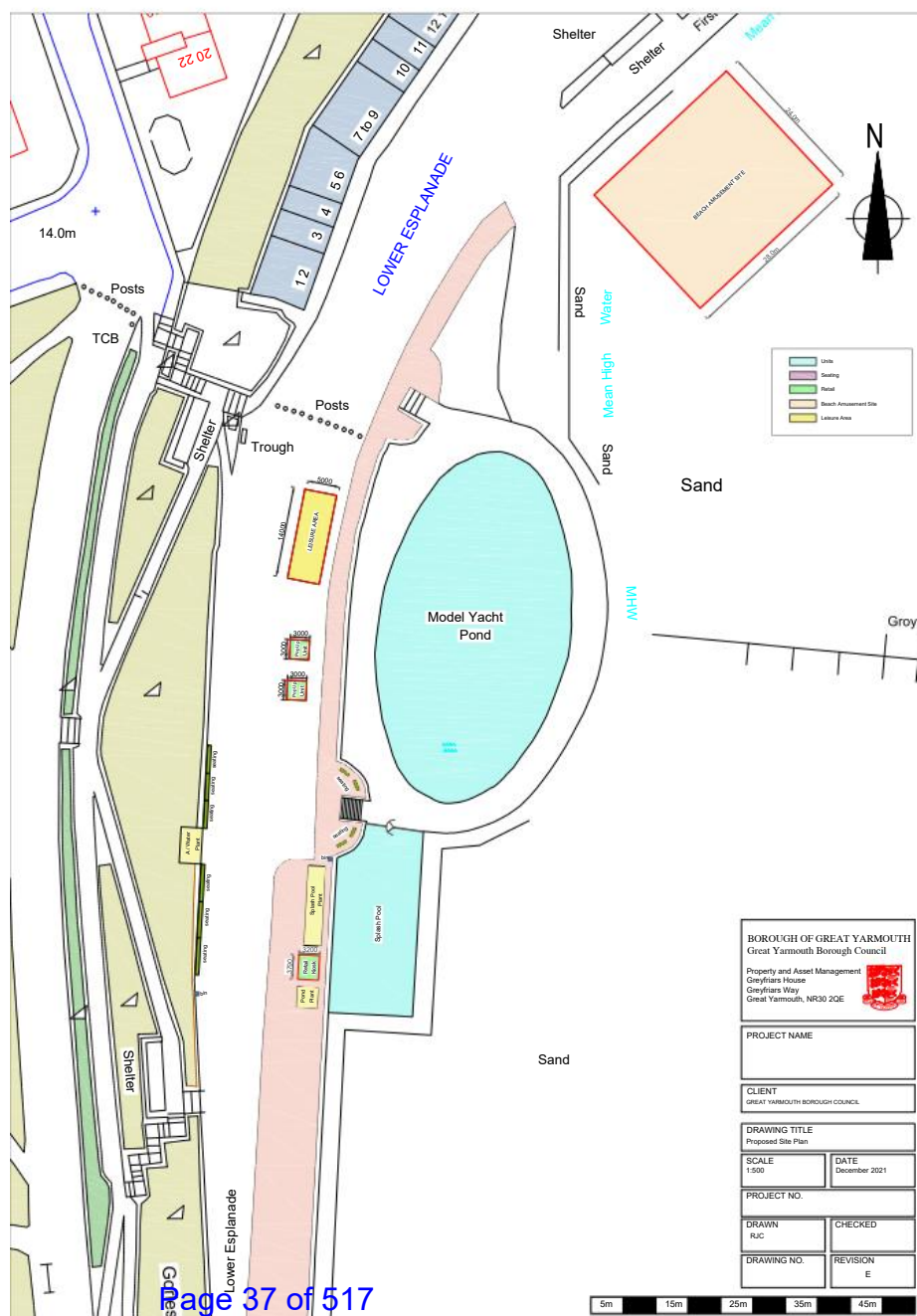


local centres such as shops and cafes on nearby Bells Road. The number of new concessions will be carefully balanced to ensure the unique character of the area is not undermined.

The beach concession could form an important addition to the area and could be complemented by additional bespoke concessions where appropriate to the location and complement the existing service.

Therefore, in principle, and subject to other considerations in the Local Plan, the Council is broadly supportive of new retailing uses along the seafront which are demonstrated as being complementary and ancillary to the tourism offer on Gorleston seafront, and which do not impact the unique character of the area.

Figure 3 - Proposed Beach Concessions on Lower Esplanade



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Cliff Top

Gorleston benefits from a range of facilities both from a built asset perspective and open space. The upper cliffs area offers a range of leisure activities including children's play, trim-trail, tennis, basketball, bowls, putting and general open space provision. The facilities are in many cases in need of refurbishment or modernisation and the development of this area could offer significant opportunities for the wider Gorleston area.

The tennis, basketball, bowls and putting facility covers an area of approximately 4 acres on the upper promenade. The tennis facilities need refurbishment with one of the three courts currently closed and overall, the provision is limited but not fully utilised. The outdoor bowling greens are well utilised by local clubs with an ability for members of the public to also use the greens. The clubhouse facilities for all leisure activities are limited at best with only toilets and a small kitchen facility available. The putting green has limited use; although well maintained, the facility is now dated.

The trim-trail is a popular attraction; having been installed some 15 years ago, the equipment remains relevant and in good condition although could benefit from some refurbishment (this has been identified through the recent Play and Open Space Audit.)

Overall, this area provides an important facility for the borough and visitors but could be enhanced to deliver wider opportunities for wider access to activities and opportunities for community development. It is proposed that a separate review is undertaken of this specific area to consider proposals and consult on options.

Action: To undertake a feasibility study based on the area and potential opportunities for the cliff top site including but not limited to the putting green through to the trim trail.



Beach Huts

In recent years beach huts have been introduced to the lower promenade at Gorleston. With one of the widest promenades the facility provides for larger beach huts with glazed doors and a veranda. A total of 70 beach huts have planning permission in the southern stretch of the lower promenade and include the use of a dedicated amenity facility. The introduction of beach huts in Gorleston has regenerated the southern part of the promenade increasing footfall to one of the quieter areas of the beach.

The scheme has proved extremely popular, and the beach huts are available for leasehold purchase or rent. The current location to the far south of the lower promenade has been so popular that a further development of beach huts has been recently approved in a more northerly location. The current beach huts have a private amenity block available only to beach hut occupiers, as part of the consultation a general lack of public toilets in the central beach area was noted. The costs of developing public toilets are a constraint, but a further development of beach huts could consider this issue as part of its business case.

Action: *Business case to be developed and considered which will create further beach huts on the lower promenade offering additional toilet facilities for users and public in line with consultation outcomes.*



Environmental Standards

Gorleston seafront is a big draw to both local people and tourists to the area, so keeping the environment clean to a high standard is essential to make people want to keep coming to Gorleston in the future. Since the pandemic, the number of visitors to Gorleston has increased and this in turn has led to a significant increase in litter needing to be collected in and around the seafront.

Both the lower promenade and cliff tops are serviced with many small capacity, traditional style litter bins which are labour intensive to empty especially during peak season. This has led to additional large, wheeled bins being deployed on the lower promenade just to keep on top of the litter volumes.

During the peak season, the bins are emptied multiple times a day with additional litter picking and cleansing patrols, maintaining high standards of cleanliness. This reduces during the off season.

There is a need to review the bin type and capacity in the seafront area to be able to deal with the high volumes of litter in the peak season ensuring we make the most effective use of the personnel we have on the ground to keep the area clean for all.

Gorleston seafront is mostly in the ownership of the Council however there are some areas and car parks that are in private ownership or owned by Norfolk County Council. As such there is a need to ensure that any work the Council is doing to maintain and enhance the environment in this area needs to involve local landowners and partners so that all areas benefit from any improved plans.



Bottleships initiative

Recycling for on-the-go litter is not available currently in the Gorleston seafront location, but there is the potential in the future through the promotion of recycling as part of the FACET project and the bottleship campaign to deploy recycling bins across the seafront areas.

There is a large amount of green open space on the cliff tops and large area of vegetation on the cliff slopes. Historically these have all been maintained by cutting every month. Last year the slopes were managed differently with a 1m strip around each area being cut monthly with the primary areas being left for the season and being cut only at the end. This led to a significant increase in biodiversity with natural flora being allowed to grow for the season and support other wildlife. This worked well and will be continued from now on.

The recreational areas on the cliff top and pier gardens are mostly grass with some herbaceous planting and some small trees. The ravine is planted with a range of herbaceous plants designed for life by the sea. The grass is cut on a monthly rota with general maintenance of the herbaceous plants and annual cutting of hedges. There is the potential as has been done on the cliff slopes to look at increasing biodiversity with reducing cutting and wildflower seeding of some areas in these locations.

Action: Undertake review of bin size, location, and capacity to ensure we can effectively deal with seasonal increases in litter and give the opportunity recycle on the go litter. Develop business case for new bins on the location based on the review and lessons learnt from roll out of Great Yarmouth seafront bins, this summer.

Action: Scope out other locations within the managed outdoor space and parks in the Seafront location that could be managed differently to enhance biodiversity in line with the Councils Sustainability Strategy.

Action: To regularly engage and communicate with partners and local landowners in the area to ensure they are aware of current and future environmental initiatives and plans, and to encourage them to look at their own areas to maintain and improve environmental quality within the location.



Events

Gorleston already hosts several annual events from the Clifftop Festival in July each year to the weekly Park Run. The wide expanse of the beach lends itself well to future opportunities such as music festivals and outdoor cinema viewings.

There is also an opportunity to use the unique environment Gorleston offers to support outdoor physical activity and wellness opportunities, such as sunset Yoga or more formal paddle boarding opportunities.

Action: To promote Gorleston seafront as the perfect space for outdoors cultural and tourism events alongside physical activity and wellness opportunities.



Next Steps

This masterplan provides a strong vision for Gorleston seafront, with some clear objectives to help guide decisions and investment in this area going forwards. The intention is to protect and enhance the uniqueness of this area for future generations and visitors to the area to enjoy.

As such an action plan will be developed to outline the activity that will be undertaken to deliver against the objectives within this strategy.

If you would like to know more about the masterplan, please email the Council at:
enquiries@great-yarmouth.gov.uk

Appendix 2 – Gorleston Seafront Masterplan Actions

Objective	Actions
Conservation	The character and significance of Gorleston seafront, together with opportunities for enhancement, and a thorough assessment of the historic built environment is set out in the Gorleston Conservation Area Character Appraisal. The appraisal provides an in depth historic development of the area and analytical survey of heritage assets. It is contained as an appendix to this document.
	The Gorleston Seafront masterplan should be read in conjunction with emerging design guides being produced by the Borough Council covering aspects of the built environment such as shopfronts, public realm and the appropriate repair of historic buildings.
	The Council will seek to liaise with the range of landowners and operators of key cultural buildings along the seafront to support their continued restoration or future enhancement.
Wayfinding & Local Enhancement	Moving forward, it will be necessary to undertake an audit of existing wayfinding and signage between Gorleston's town centre and seafront areas to identify what key community, tourism and leisure attractors are between them, and how best to interpret their walking and cycling legibility both across the masterplan area and further afar. Any new potential wayfinding or signage solution will need to be considered and designed in conjunction with emerging design guides being produced by the Council to ensure any solution responds sensitively and appropriately to the area's unique character.
	The Council will seek to liaise with the different landowners in the area to facilitate environmental improvements and a revitalised focus in the area. This may include repairs to fencing, hardstanding areas, landscaping improvements around the Pavilion Theatre, and the potential introduction of new lighting and public realm facilities within the area.
Sustainable Transport & Parking	By having regard to the conclusions of the LCWIP and outcome of the E-Scooter trial, the Council will consider the prioritisation and implementation of footway and cycling enhancements, and EV charging apparatus within the masterplan area. This will help improve the general inter-connectivity between the seafront and high street areas and increase the availability and options for both residents and visitors to access sustainable transport modes in the seafront area.
	To consider options and feasibility to extend the public realm of the seafront and create more open space, extending the playful area of the beach and promenade with attractive landscaping and street furniture enabling safe access for pedestrians to the beach and promenade.
Accessibility	Consideration needs to be given to provide additional accessible parking bays in the Lower Esplanade carpark and to improve the existing bays to ensure they meet Part M of the Building regulations and BS8300:2018.
	Engagement with existing businesses to provide advice on how access to their venues could be improved in terms of accessibility.
	Put in place signage on the pathway slopes highlighting their gradients and potential hazard to wheelchair users.

Objective	Actions
	Review pathways throughout the seafront area to ensure they remain well maintained and where funding allows undertake capital works to ensure they are made safer for all user groups.
	Improve signage to existing changing places toilet facility near the Ocean rooms, ensuring that there are processes in place to respond to an alarm if raised by users within this facility. Alongside this investigate additional opportunities to increase accessible toilet provision across the wider seafront area.
	Implement the use of independent use beach wheelchairs, like the scheme that operates on Great Yarmouth seafront.
	Explore leisure activities that can be hosted on the seafront that support all users, such as adaptive cycling; engagement with disability groups and clubs will help develop such opportunities.
	Investigate the installation of a fully accessible boardwalk from the lower promenade stretching toward the sea.
Leisure	To undertake a feasibility study based on the area and potential opportunities for the cliff top site including, but not limited to, the putting green through to the trim trail.
	To undertake a feasibility study based on the area and potential opportunities for the cliff top site including, but not limited to, the putting green through to the trim trail.
Environmental Standards	Undertake review of bin size, location and capacity to ensure we can effectively deal with seasonal increases in litter and give the opportunity to recycle on the go litter. Develop business case for new bins on the location based on the review and lessons learnt from roll out of Great Yarmouth seafront bins, this summer.
	Scope out other locations within the managed outdoor space and parks in the Seafront location that could be managed differently to enhance biodiversity in line with the Councils Sustainability Strategy.
	To regularly engage and communicate with partners and local landowners in the area to ensure they are aware of current and future environmental initiatives and plans, and to encourage them to look at their own areas to maintain and improve environmental quality within the location.
Events	To promote Gorleston seafront as the perfect space for outdoor cultural and tourism events alongside physical activity and wellness opportunities.

URN: 22-191

Subject: Renewal of Public Space Protection Order NO.2- Vehicle Related Anti-Social Behaviour

Report to: ELT – 23rd November 2022

Policy and Resource Committee – 6th December 2022

Council - TBC

Report by: Paul Shucksmith – Environmental Protection and Waste Manager

James Wilson – Head of Environment and Sustainability

SUBJECT MATTER

Public Protection Order No.2 was introduced in 2017 to assist in addressing vehicle related anti – social behaviour along the seafront in Great Yarmouth. The Order was extended in 2020 and this extension is due to expire on 1st February 2023. This report seeks member approval to extend it by a further three years. The Police have also signified they would like an amendment to the PSPO to address unnecessary or excessive revving of engines by vehicle owners.

RECOMMENDATION

- That Members agree to the Order being extended by a further three years
- That Members agree to an amendment to the Order to help address unnecessary revving of engines

1. Introduction

1.1. The Anti-Social Behaviour (Crime and Policing) Act 2014 provided local authorities with a range of powers to assist in tackling anti- social behaviour (ASB) within the community. One of these powers is the Public Space Protection Order (PSPO)

1.2. PSPO'S are designed to replace and streamline a range of powers such Byelaws and other types of Orders which have historically been available to local authorities. They can be used to prevent or address behaviour carried out in the public space which have had, are having or could have a detrimental effect on other people in the locality.

- 1.3. Councils may make a PSPO where there is an evidenced need and as part of its implementation must consult with the Police and appropriate community representation.
- 1.4. PSPO's last for a duration of up to three years after which time they must be reviewed and renewed if they are still required
- 1.5. Currently the Council has three PSPO's. PSPO no.1 relates to alcohol related anti-social behaviour, PSPO no.2 relates to vehicle related anti-social behaviour and PSPO no.3 related to dog control.

2. Background To PSPO No.2

- 2.1. Historically Great Yarmouth has had a problem with vehicle related anti-social behaviour along the town's seafront. Vehicle enthusiasts routinely meet as a social gathering, particularly on Sunday evenings, mainly gathering on South Beach Parade.
- 2.2. Whilst most of this gathering is well behaved, there are a number of individuals whose manner of driving/ behaviour whilst in charge of a vehicle gives rise to harassment, alarm or distress in the community and on occasions potentially endanger public safety.
- 2.3. Prior to the implementation of PSPO NO.2 the principal means of trying to address the issues of noise and anti-social behaviour from this gathering was Operation Clarion, a joint campaign between the Council and the Police. In the absence of practical enforcement powers to deal with ASB, the Council concentrated on the noise element emanating from the car enthusiasts and the Police used the Road Traffic Act 1988 in an attempt to tackle any anti-social behaviour.
- 2.4. In conjunction with environmental/structural changes to the road and parking layout Operation Clarion did see a reduction in the number of issues being caused. However, it was not as effective in addressing the wider behavioural issues such as wheel spinning, burn-outs and drag racing. Operation Clarion was also very resource intensive for the Council with multiple officers often being present along the seafront at peak times.
- 2.5. PSPO NO.2 (Appendix 1) was introduced in February 2017 following a proposal from the Police to implement such an Order to be able to better address and enforce the anti-social activities that were still routinely occurring. As per the requirements a consultation exercise was carried out with the Public who supported the proposal.
- 2.6. The PSPO ran for the period of three years and on the lead up to its review date in 2020 the Police identified that they would like it renewed on the basis that since the PSPO'S introduction reports of anti-social behaviour from vehicles had seen a continued reduction. A further consultation was carried out the PSPO again received public support in its renewal.

- 2.7.** The PSPO is due to expire on 1st February 2023 and must be reviewed. The Police have again indicated they would like it renewed.

3. Requirements of the PSPO

- 3.1.** PSPO No.2 places control measures on the behaviour of car enthusiasts who frequent and gather along Great Yarmouth seafront.
- 3.2.** The Order provides authorised Officers, including the Police, with a mechanism to act against individuals who carry out prohibited behaviours. These behaviours are covered in Part 5 of the PSPO (Appendix 1) but includes performing vehicle stunts, rapid acceleration/deceleration , playing amplified music at a high volume and other behaviours which may cause a nuisance.
- 3.3.** Whilst Councils Officers can also be authorised to enforce the PSPO in practical terms this is carried out by the Police.
- 3.4.** Penalties for a breach of a PSPO is a fine of up to £1000 upon prosecution or, as an option a Fixed Penalty Notice can be offered- for Great Yarmouth this is currently set as £80 or reduced to £60 if paid within ten days.

4. Extension and Amendment of PSPO No.2 -Policing

- 4.1.** Dialogue with the Police during 2022 identified that they would like to renew PSPO No.2 on the basis it provides them with a mechanism to address vehicle related ASB. Consequently, a public consultation was carried out to seek public feeling about this proposal of an extension. Superintendent Nathan Clark from Norfolk Constabulary has subsequently provided a letter formally requesting and supporting its renewal (Appendix2)
- 4.2.** It is clear from the statement from Superintendent Clark that the Police believe the PSPO acts as a deterrent and an effective tool in dealing with vehicle related anti-social behaviour. The Police report they continue to see lower levels of reported issues against what they received prior to the PSPO's introduction.
- 4.3.** The Police are using these powers in a proportionate manner and using the PSPO to address in an educational manner minor breaches before they escalate to something more serious. The below table shows Police actions over recent years. Obviously 2020/21 figures will be affected by lockdown restrictions.

Apr-Mar	2020-2021	2021-2022	2022-
Warning Letters	Started 2021	38	59
Breaches Passed to Council	3	18	2
FPN's Issued	2	9	2
FPN's Paid/Finalised	0	7	2
Summons	1	0	0

4.4. As part of the dialogue over its renewal the Police have identified they would like the PSPO to be amended by having an additional control measure added to section 5 of the PSPO. The Police have encountered on a number of occasions drivers who, either whilst static or mobile, excessively rev their engines presumably as form of exhibition which does provide an annoyance to residents. Whilst the Police will speak with the owner of the vehicle the current PSPO does not provide any powers to address this behaviour.

4.5. It is proposed to therefore include within section 5 of PSPO No.2 an additional prohibited behaviour which will be:

“The unnecessary or excessive revving of a motor vehicles engine causing or being likely to cause a nuisance to a person in the locality of the restricted area”

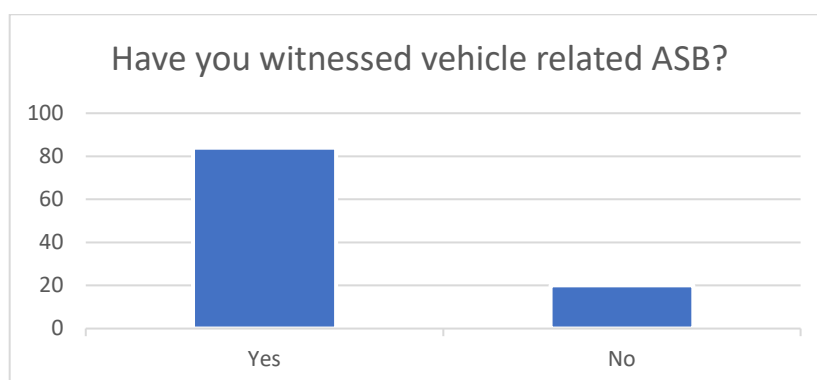
5. Consultation

5.1. For the implementation or renewal of a PSPO the Council are obliged to seek the views of the Police and relevant community representation. A formal public consultation was commenced 26th September 2022 and was appropriately advertised as is required. Closing date for the consultation was 22nd October 2022.

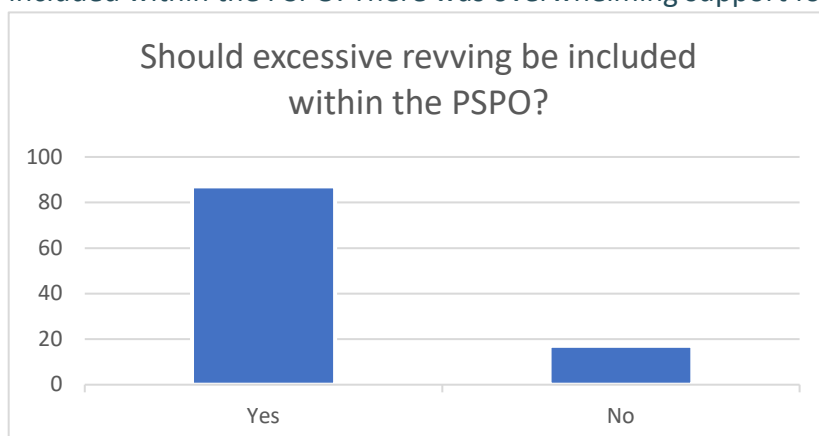
5.2. In total 104 consultation responses were received. Full consultation feedback can be found in Appendix 3 which also provides individual responses.

5.3. Comments within the consultation were in the main supportive of the PSPO and a lot provided examples of unacceptable behaviour they had witnessed. There was a number of comments from residents who identified they lived along the seafront who felt the PSPO has had a positive effect and if not renewed levels of anti-social behaviour would go up.

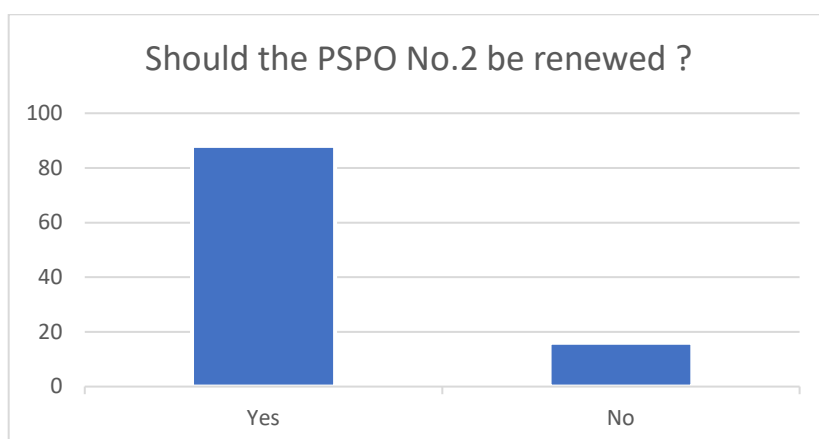
5.4. Overall, the majority of respondents said they had seen vehicle related ASB. Many provided examples such as wheel spinning, burnout and loud music. 9 people commented directly about the revving of engines.



- 5.5.** Respondents were asked if they believe the issue of excessive revving should be included within the PSPO. There was overwhelming support for this:



- 5.6.** Overall there was support for the PSPO to be renewed with the majority of respondents saying they believe it should be renewed:



6. Conclusions/Recommendations

- 6.1.** Both the Police and the feedback from the public consultation support the PSPO and its renewal. Based on this it is recommended that the Order is renewed for a further three years from 2nd February 2023.
- 6.2.** At the request of the Police, it is recommended that the PSPO is amended to be able to address the issues of excessive or unnecessary revving. This was also supported by the majority of the respondents to the consultation.

7. Financial Implications

- 7.1.** There are no current direct financial implications identified

8. Legal Implications

- 8.1.** Section 72 of the 2014 Act requires that in deciding whether to extend a PSPO the Council must have regards to the rights of freedom of expression and freedom of assembly and association set out in articles 10 and 11 of the Convention for the Protection of Human Rights and Fundamental Freedoms
- 8.2.** Whilst acknowledging that the proposed Order could potentially infringe on an individual's human rights, including the right to respect for private life and potentially the right to freedom of assembly and association, it is considered that these qualified rights may in this instance be interfered within the interests of public safety, the prevention of crime and disorder and in accordance with the law.
- 8.3.** As required under section 72 of the 2014 Act the Council has carried out the necessary consultation and notification before deciding whether to extend and amend the PSPO or not. If the extension is agreed a notice will be published identifying that the Order has been extended.

9. Risk Implications

9.1. No risks have been identified

Area for consideration	Comment
Monitoring Officer Consultation:	No
Section 151 Officer Consultation:	No
Existing Council Policies:	No
Financial Implications (including VAT and tax):	No
Legal Implications (including human rights):	Yes
Risk Implications:	No
Equality Issues/EQIA assessment:	No
Crime & Disorder:	Yes
Every Child Matters:	No

GREAT YARMOUTH BOROUGH COUNCIL
PUBLIC SPACES PROTECTION ORDER No. 2
VEHICLE RELATED ANTI-SOCIAL BEHAVIOUR

1. This Order may be cited as the Great Yarmouth Borough Council Public Spaces Protection Order No. 2.
2. The Great Yarmouth Borough Council (the "Council") makes this Order under its powers contained in s59 of the Anti-Social Behaviour, Crime and Policing Act 2014 ("the Act"), being satisfied on reasonable grounds that the activities set out in paragraph 5 in the location described in paragraph 4 of this Order being within the area marked on the plan contained in the schedule to this Order have had or are likely to have a detrimental effect on the quality of life of those in the locality, or it is likely that activities will be carried out within that area and have such an effect. The Council is also satisfied that the effect, or likely effect, of the activities is, or is likely to be, of a persistent or continuing nature and that these activities are unreasonable and justify the restrictions imposed by this Order and that it is in all the circumstances expedient to make this Order for the purpose of reducing anti-social behaviour in a public place.
3. This Order comes into force at midnight on 1 February 2017 for a period of up to three years thereafter, unless extended by further order under the Council's statutory powers.
4. This Order applies to any public place within that part of Great Yarmouth shown outlined in red on the plan contained in the schedule of this Order ("the restricted area"). A public place is any place to which the public or any section of the public has access, on payment or otherwise, as of right or by virtue of express or implied permission. This includes but is not limited to: car parks, sports fields and playing fields and their attached facilities, parks and recreation grounds, public highways including footway and verge, esplanades, public open space land and communal open space owned by the Council or other landowner.

- 5. Subject to paragraph 6 below any person is prohibited from personally carrying out or assisting or encouraging any other person to carry out any of the behaviours specified in (a) to (h) below at any time in the restricted area:**
- (a) Driving a motor vehicle ("motor vehicle" is defined in the schedule) at excessive speed causing or being likely to cause a nuisance to persons in the locality of the restricted area.**
 - (b) When driving a motor vehicle causing repeated sudden and rapid acceleration or deceleration of the motor vehicle causing or being likely to cause a nuisance to persons in the locality of the restricted area.**
 - (c) Racing other motor vehicles causing or being likely to cause a nuisance to persons in the locality of the restricted area.**
 - (d) Performing stunts using a motor vehicle causing or being likely to cause a nuisance and/or danger to persons in the locality of the restricted area. Performing stunts includes but is not limited to doughnutting, drifting, handbrake turns, wheelies, wheel spins or any other motor vehicle related activities which cause or are likely to cause a nuisance and/or danger to persons in the locality of the restricted area. Descriptions of the activities of doughnutting, handbrake turns, drifting, wheelies and wheel spins are set out in the schedule.**
 - (e) Sounding motor vehicle horns other than in accordance with the Highway Code in a manner causing or being likely to cause a nuisance to persons in the locality of the restricted area.**
 - (f) Playing amplified music in a motor vehicle or powered from a motor vehicle causing or being likely to cause a nuisance to persons in the locality of the restricted area.**
 - (g) During an activity specified in paragraphs (a) to (f) above, using threatening and/or abusive language or otherwise intimidating another person causing or likely to cause a nuisance to persons in the locality of the restricted area.**

- (h) Dropping litter from a motor vehicle.
6. An activity or behaviour which is authorised by the owner of that part of the restricted area where the activity or behaviour is taking place is not a breach of this Order.
7. Section 67 of the Act states that it is an offence for a person without reasonable excuse:
- (a) To do anything that the person is prohibited from doing by a public spaces protection order or,
 - (b) To fail to comply with a requirement to which the person is subject under a public spaces protection order.

A person guilty of an offence under section 67 of the Act is liable on summary conviction to a fine not exceeding level 3 on the standard scale.

A person does not commit an offence under section 67 of the Act by failing to comply with a prohibition or requirement that the local authority did not have power to include in the public spaces protection order.

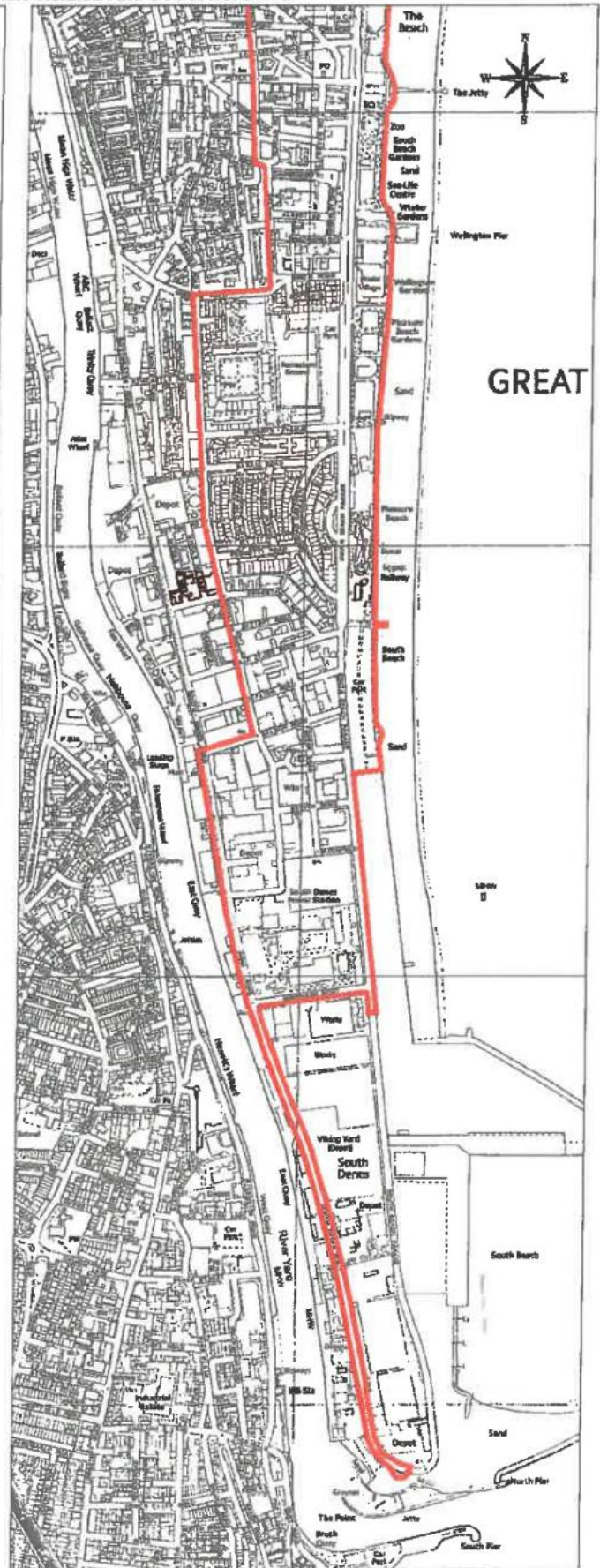
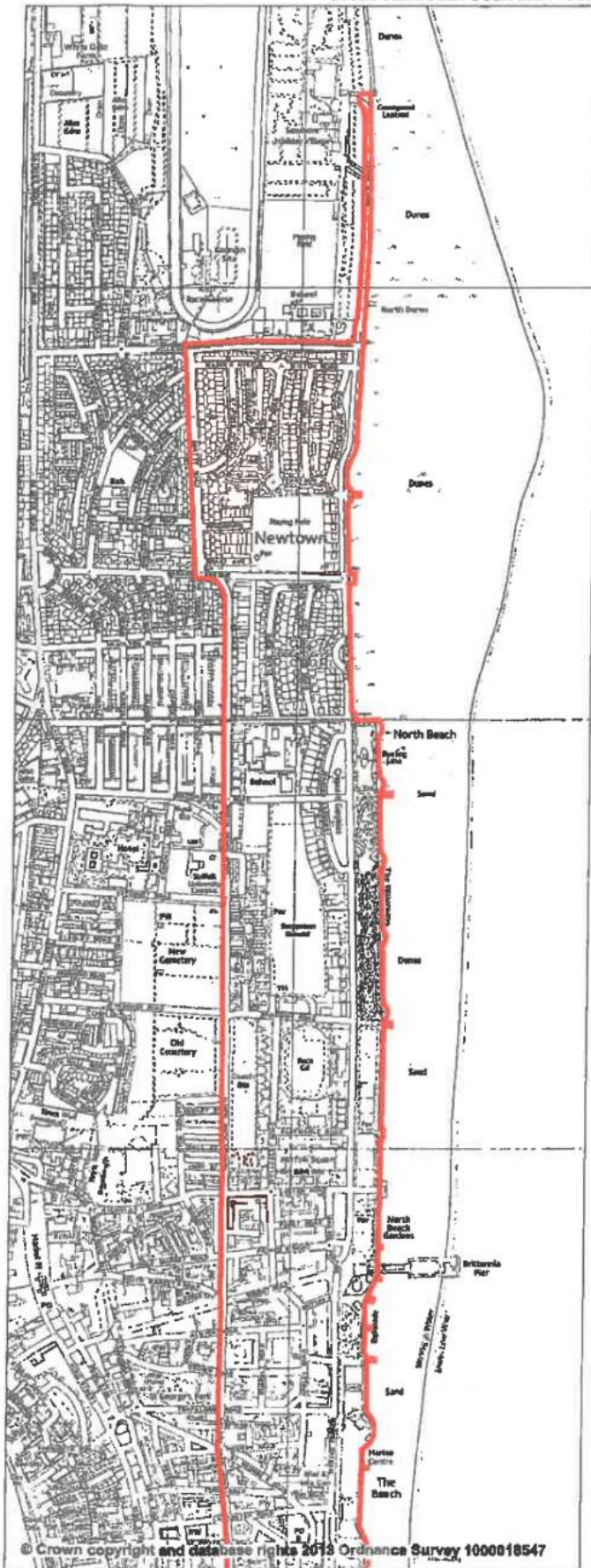
A fixed penalty notice could be issued for a breach of this Order which if it remains unpaid could lead to prosecution.

Challenging the validity of orders

An interested person may apply to the High Court to question the validity of this Order and an interested person means an individual who lives in the restricted area or who regularly works in or visits that area. Any such interested person may apply to the High Court within six weeks from the date on which this Order was made on the grounds that the Council did not have the power to make the Order or to include particular prohibitions or requirements imposed by the Order or that a requirement under Chapter 2 of the Act was not complied with in relation to this Order.

SCHEDULE

Public Spaces Protection Order No 2, 2016
Great Yarmouth Seafont – Vehicle Related Anti-Social Behaviour



GREAT YARMOUTH
BOROUGH COUNCIL

**Strategic Planning, Housing and
Regeneration Development**
 Town Hall, Hall Plain
 Great Yarmouth, Norfolk, NR30 2QF
 Customer Contact Centre Tel: (01493) 569100
 Email: planning@great-yarmouth.gov.uk
 Web: www.great-yarmouth.gov.uk

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Date 27 Oct 16	Scale A3 - 1:10,000

**Great Yarmouth Borough Council
Public Spaces Protection Order No. 2
Vehicle Related Anti-Social Behaviour**

Definition of Motor Vehicle:

In this Order, the term 'motor vehicle' means a mechanically propelled vehicle, intended or adapted for use on roads.

Description of prohibited activities:

Doughnutting - driving around in a repetitive manner, for example in a figure of eight at the central reservations.

Hand brake turns - using the handbrake to turn the vehicle.

Drifting - use of the accelerator when going into a bend causing the tail end of the vehicle to slide.

Wheel spins – (1) use of the accelerator when the vehicle is stationary and before releasing the handbrake causing the wheels of the car to spin and noise and/or smoke to be produced. Or (2) accelerating at speed which causes the wheels of the vehicle to spin in a manner a competent driver would expect not to happen in the normal course of driving.

Wheelies - A trick or manoeuvre whereby a motorcycle or other motor vehicle is ridden for a short distance with the front wheel or wheels raised off the ground.

Dated 6/12/16

THE COMMON SEAL of Great Yarmouth Borough
Council was hereunto affixed in the presence of





Jane Beck
Director of Customer Services
Great Yarmouth Borough Council



Public Spaces Protection Order No 2

Great Yarmouth Borough Council

Extension of Public Spaces Protection Order No 2

The Council, following a statutory consultation and in exercise of its powers under section 60 of the Act, at Full Council Meeting on 19th December 2019, Agenda item 5 has unanimously approved the extension of this PSPO for a further 3 years.

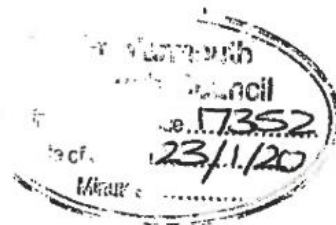
Dated: 23rd January 2020

The Common Seal of Great Yarmouth Borough Council was affixed in the presence of

Signature



Authorised Officer: Paula Boyce, Strategic Director
Great Yarmouth Borough Council



STATEMENT OF POLICE SUPERINTENDENT, NATHAN CLARK

The renewal of the Public Space Protection Order (PSPO) is vital in minimising the impact of vehicle nuisance and ASB involving cars, bikes, and mopeds in our Borough.

Antisocial use of a vehicle, such as street racing, street cruising or off-road use is more than a matter of noise pollution – though this can be the most noticeable problem.

The Police Officers that cover the most affected locations, the Great Yarmouth Seafront area, state that it has become an invaluable tool to tackle anti-social behaviour before it starts and even the most persistent offenders have moderated their behaviour since this legislation was implemented. Police find this not only an important enforcement tool but also useful for weekly engagement with numerous verbal warnings being issued for minor infringements of the legislation.

Strong justifications exist for a focus on vehicle nuisance due to the following factors:

- Street racing is extremely dangerous as it can involve high speeds, weaving through traffic and ignoring traffic signals like red lights. This obviously puts other road users and members of the public in an extremely dangerous position.
- Performing stunts and tricks such as doughnuts and wheelies, whether on public roads or in car parks, can be dangerous to both the driver or rider and bystanders. It can also cause noise nuisance, especially if taking place at night in residential areas.
- The visibility of such activity means it is of specific concern to the public. Some people regard this kind of vehicle use as harmless fun. However, regular antisocial vehicle use can have a wider impact on a neighbourhood or community than simply nuisance noise. The effect of dangerous or reckless use of a vehicle can lead to criminal damage of roads, other vehicles and surrounding property.
- Drivers and riders also risk injuring themselves, other road users, cyclists, and pedestrians as they do not have full control of their vehicle and their full attention on their surroundings.
- Driving or riding in this way can also be used as a form of intimidation, either to other road users or the community. Loud noise from engines and music, and deliberately creating large amounts of exhaust or tyre smoke can also be seen as an aggressive act.

Data collated by Norfolk Constabulary demonstrates how effective PSPO's can be in reducing both ASB and crime in urban areas. Within the Great Yarmouth Borough, vehicle related ASB incidents have continued to reduce. This highlights the fact that the current Public Space Protection Order (PSPO) has been successful in reducing incidents. With recent events in Lincolnshire following injuries to members of the public hit by a car enthusiasts' vehicle the need for the PSPO has never been greater.

Police officers over the years have demonstrated this legislation has not been used as a coercive police power. Enforcement has been used in a sensible and proportionate way, with 2 investigations recorded in 2022. However, over the same period officers have utilised this

legislation every week with 59 warning letters sent in 2022 alone, it provides the authority to engage those participating in car meets on the Seafront.

Nathan Clark

Superintendent 4210

North Norfolk & Great Yarmouth District Commander

Norfolk Constabulary

www.norfolk.police.uk

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supportive | professional | integrity | respect | impartial | transparent

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comments

As far as I am concerned the PSPO is an absolute waste of time if it not being enforces. The residents of South Beach Parade are weekly disturbed and alarmed at the behaviour of the 'boy racers' and many calls are logged with Norfolk Constabulary's 101 service. Us residents would encourage the use of the PSPO if regular enforcement is undertaken. Surely there is data which demonstrates how well the PSPO is working to tackle such behaviour by means of police penalties for those in breach? South Beach Parade end of the Seafront is becoming a rat run not only the boy racers but commuters and HGV's who all travel in excess of the 30mph speed limit and will only become worse when the third river crossing is completed. In my honest opinion a simple speed hump or camera or other speed prevention devices would completely eradicate this problem. I have not once witnessed either the police or community speedwatch registering speeds here which I believe would be beneficial.

Has been better but when called the Police about very loud music from a stationary car outside a property in the PSPO area very late at night was told to call Council as Police could not deal with it, that loud that lots of the neighbours could not sleep

I do not participate in these meet ups nor am I a massive fan of them but I do think they bring a lot of people to Great Yarmouth and I do think that is a good thing. I agree there shouldn't be anti social behaviour but we shouldn't shut it all down.

At the traffic lights on Queen's Road I saw 2 boy racers racing side by side and run straight through the red lights doing excess speeds lucky no-one was crossing and very loud music and wheel spinning at traffic lights

Driving at very high speed especially on a Sunday night on the A47 Gorleston bypass and through to Lowestoft needs addressing.

I lived on the sea front for 2 years and trying to get a whole night sleep was a joke one of the reasons I moved closer to town, give them an area where no one lives to do that then they be happy and so will the public

It says INVALID when I add a comment.

concentrate on making Great Yarmouth great again, the town is so run down and it's all down to the council... just look at the waste of money spent on the new market (shed) could of been spent elsewhere on the town

I think the seafront should be shut to all cars in the summer, in the winter there should be speed bumps along the seafront and all parking areas fenced off or blocked after 6 pm in the winter

If "excessive revving" can't be defined, then how can you enforce ?

The amount of cars and motor bikes speeding doing tyre screeching burnouts on Yarmouth seafront is a noise nuisance and frankly dangerous in the summer it's relentless with no consideration for local residents

The amount of cars and motor bikes speeding doing tyre screeching burnouts on Yarmouth seafront is a noise nuisance and frankly dangerous in the summer it's relentless with no consideration for local residents

All you have to do is check they've declared their modifications to their insurance as the vast majority of young drivers don't as the insurance would cost far more than the vehicle is actually worth.

Also gapton hall is so unsafe after 6pm with groups of cars doing donuts and speeding. Dangerous, threatening behaviour.

Make.the.penalty.hurt.softly.softly.will.not.work.

The inclusion of banning "Dump Valves" should considered. Are these vehicles checked with insurance companies about being notified of modifications as this I believe, if provided to insurers disqualifies cover.

Had to call the police on a few occasions when it's unbearable BANG BANG BANG
suffer from neighbours friends revving car up twin big boor exhausts

Had to call the police on a few occasions when it's unbearable BANG BANG BANG

Speeding up and down Queens Road

The speed these vehicles reach is going to cause a fatality.

Excess noise and speeding is a daily occurrence on Gorleston High st . 20mph zone never ever enforced so basically pointless . Camera reqd !

Find somewhere for boy racers to use safely and we're won't moan. Youngsters need somewhere to b youngsters

If it's taxed and insured you can do anything so why are you trying to pursue this

Currently as soon as the police precense moves off the cars start to rev, race, doing donuts and popping exhausts along South Beach Parade. Particularly bad on a Sunday and impacts quality of life and sleep.

GY has a long history of car enthusiasts, showing/sharing their love of cars. It is a key aspect of GYBC's 'cultural heritage'. We should embrace cultural heritage, allow local clubs to organise and self-police events.

I work in security and patrol the sea front and gapton hall and these boy racers are causing a issue to everyone around the area

It's a hobby for people to customise cars

It's one evening a week and most of them just like to show there cars off I live near where the park up and have no problem.

Stop being utter plebs and soet the real problems in yarmouth

The police have told me off for asking users to move so I could get on my property. The asb escalates after the police move on . It needs to be started earlier in the evening as children may be asleep

everyday boy racers rev up and down the sea front and going far too fast

By changing the parking spaces on the section outside of the Pleasure Beach Gardens, so they are unable to park in the centre of the road, to having to park sideways this should help the situation on Sunday Evenings.

The PSPO should also be extended to Gapton hall shopping area as that is a hotspot for youngsters meeting at late hours in the car park revving their engines and many other vehicle related anti-social behaviour

We live directly opposite the waterways and continually get the 'getty boys' speeding and racing along north drive. Not sure if this end of seafront is covered by this scheme.

Crime will go up in the area if this PSPO is removed

I am extremely worried with the proposed cycle lane and double yellow lines due to be implemented on Jellicoe Road that the car enthusiasts will use more of Jellicoe Road for racing down to the lights more than they do now.

Deliberately popping exhausts whilst passing by with dogs, feel uncomfortable passing the pleasure beach area when they are all sitting there with lights on, engines running - they even bring fold up chairs to sit around the cars now.

Why not allowed to give an opinion it says invalid so can't voice your opinion on online survey.

Carparks should be locked by 9pm and boy racers go 60,70, mph after police go on Sundays. Motorbikes rev engines gone midnight absolutely disgusting

This should also include many trucks passing my premises at 05.00am onwards to collect ballast from the harbours mouth area.

This is also anti social behaviour of which nothing is being done.

Please continue the scheme as it has significantly reduced (but not yet eliminated) anti social behaviour and racing etc.

I live on south beach parade and life is much better since the order came into force. We still have some anti social driving. But I believe that if the order is not extended south beach parade will return to the race track it used to be.

Every Sunday night, I can hear continuous revving of engines, skids and very loud popping exhausts. Along with blaring, very bassist music that literally shakes my house

Speeding, revving of engines, loud music, racing is a real problem on Fremantle road, which is used as a cut through to the sea front, so I would very much like to see the PSPO continued.

I think this is all covered by the highway code , and all the activities in the order are an offence , so what is the point ?

This sort of thing is all over the town. Not just the sea front. Near the train station it goes on a lot most weekends late night. During week also at times. This council and police only concerned with sea front. Rest of town left to rot

Fed up with the dangerous driving bad language and litter every sunday

I think it would be a backward step to not renew this order as having lived on the seafront for over 40 years, we know from experience that when rules are relaxed the problems come straight back.

Further driving behaviours should be included to combat noise pollution and road safety. In addition the area should be made bigger to include areas such as Garton Hall where a problem is becoming apparent

The actions of this group causes significant disruption to and detracts from visitors using a prime tourism (revenue generating) area. A few of this group make it an unusable and highly antisocial area of the seafront. Seafront is worse than ever at weekends.

Perhaps we could look at extending the area as this is a boroughwide issue now with drivers who really should not be in vehicles with extremely loud exhausts, music, excessive acceleration all over the Borough

This is a priority around the town, just as drivers are a big part of the problem. They drive recklessly, breaking traffic restrictions constantly. They endanger public safety with no regard for the law.

Inclusion and ENFORCEMENT of engine idling / revving in residential areas (just off the sea front) and the ever increasing amount of unnecessary acceleration on the back streets just so the modified 'dump valve' can make a sound.

Seafronts restricted parking zones in the evening outside the Wellington pier is an absolute joke. You are not able to walk along the pedestrian walkways because they are blocked by parked cars and the horse/bike lane is dangerously used by cars

St Nicholas car park at night for donuts is not policed, the residents of Seafeld close are massively affected by this in the summer and are woken up during the night

Cars racing and driving at excessive speeds between the power station and the Wellington pier has not been dealt with. It is common to see cars passing the pleasure beach in excess of 50-60mph when the area is not policed

There is a significant trend in cars with delayed timing causing a loud popping sound, this is louder than cars revving engines

Test

Anything that helps keep our beautiful seafront safe and pleasant for locals and tourists alike can only be beneficial. It would be a shame to let this slip.

We live within the protection order. Not only do we see incidents that are protected by the order but also continuous speeding along the north of the protected area. We would urge a 20mph speed limit along the whole of the protected area.

There seems to also be an increase in and around Gorleston of extremely loud exhausts on cars, and speeding cars along the A47 and Marine Parade, Gorleston during the night, can these areas be included too?

Close the car park opposite log flume at night to stop some of the nuisance drivers

There is also excessive speeding, engine revving and loud music outside my property on Euston Road especially late in the evening.

excessiverevving	otherrelationship
Yes	

Yes	
No	
No	
Yes	
Yes	
Yes	
Yes	
Yes	
Yes	
Yes	

No	
Yes	
No	
Yes	
Yes	
Yes	

Yes	
No	

Yes	

Yes

Yes

Yes

Yes

Yes

No

No

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

No

Yes

No

Yes

Yes

No

Yes

Yes

Yes

No

No

No

No

No

Yes
Yes
Yes
Yes

Yes
Yes
Both resident and business owner on the sea front

Yes
Yes
Yes
Yes

Yes
Yes

Yes
Yes
Yes
Yes

Yes
Yes

Yes
Yes

Yes
Yes
Yes
Yes
Yes

Yes

Yes Employee in Great Yarmouth area

Yes

Yes

No

Yes

Yes

Yes

Yes

No

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

relationship to great yarmouth	seen as behaviour
A resident of the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	No
A resident of the Borough of Great Yarmouth	No
A resident of the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	No
A resident of the Borough of Great Yarmouth	No
A resident of the Borough of Great Yarmouth	No
A resident of the Borough of Great Yarmouth	No
A resident of the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	No
A resident of the Borough of Great Yarmouth	Yes

[illegible]

A resident of the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	Yes
A business owner in the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	Yes

A resident of the Borough of Great Yarmouth	Yes
Other	Yes

A resident of the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	Yes

A resident of the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	Yes

A resident of the Borough of Great Yarmouth	Yes
A business owner in the Borough of Great Yarmouth	Yes
A business owner in the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	Yes

A resident of the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	Yes

A resident of the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	No

A resident of the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	No
A business owner in the Borough of Great Yarmouth	Yes
A resident of the Borough of Great Yarmouth	Yes

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URN: 22-222

Subject: Great Yarmouth Services Ltd Business Plan 2023/24

Report to: Policy & Resources Committee – Tuesday 6th December 2022

Report by: Chris Silverwood – Director of Operational Services

SUBJECT MATTER/RECOMMENDATIONS

Members are asked to approve:

1) the Great Yarmouth Services Ltd (GYS) Business Plan for 2023/24 alongside GYS Operational Plans, as provided for under the scheme of Delegation in relation to acting as the Member for GYS.

Members are asked to note that the budget for the delivery of these services as included in the business plan reflects the forecasted current year position and an allowance for an uplift. The budget will still need to be approved by Full Council in February, and therefore could be subject to some adjustments prior to this final approval.

1. Background

1.1 On the 9th December 2021 the Council agreed to allow the for natural expiry of its Joint Venture Company, Great Yarmouth Borough Services Limited. As such this company will cease delivering waste and ground services on behalf of the Council from the 31st March 2023. The Council has since established a wholly owned Local Authority Trading Company, Great Yarmouth Services (GYS) to undertake these operational services from the 1st April 2023.

2. Introduction

- 2.1 On establishing GYS the new company has worked hard to develop its Business Plan for 2023/24. This has included working with officers within GYBS and the wider Council in the development of the activities and costs required to deliver the services outlined within this Business Plan.
- 2.2 See Appendix 1 for a copy of this Business Plan, which outlines the companies aim and actions that it will undertake during 2023/24, along with information concerning company governance and performance management.

2.4 The Business Plan includes the cost of delivering the services of GYS for 2023/24 which totals £6,177,233.41. This equates to a 3% uplift from the forecasted outturn for 2022/23.

2.5 Alongside the Business Plan which provides an overview of the services that GYS will deliver, five Operational Plans have also been developed, these Plans outline how the GYS business units will operate and work to achieve the overall aim of GYS, which is to deliver an excellent standard of service across the borough in line with Council's Corporate Plan. The five business units are:

- **Open Spaces Services** - Grounds maintenance, Leisure maintenance, HRA Grounds maintenance, Grave Digging, Arboricultural services & Tree Management;
- **Waste Collection Services** – domestic refuse and recycling collections, Garden waste collections, Commercial waste collections;
- **Street Scene Services** - Street cleansing, building cleaning, HRA Cleansing maintenance, Public Toilet cleaning, Bulky collections & Bin deliveries;
- **Support Services** - Car Clear, Pest Control, Customer Services, Health & Safety, internal training, project management, business management;
- **Fleet Management** – Transport compliance, HGV & LCV servicing and maintenance, Plant & Machinery maintenance, depot management.

3. Financial Matters

3.1 The existing joint venture, GYBS, has been under considerable financial strain in terms of trying to absorb the cost of increase fuel, inflation, and staff wage increases. These pressures will continue as the new company, GYS, establishes itself.

3.2 Whilst the new company is committed to ensuring best value for the Council and seeks to reduce cost/identify commercial opportunities where possible, it will need to increase its overall budget for 2023/24 in comparison with the GYBS budget for 2022/23, if the current level of service provision is to be maintained.

Service Area	23/24 Budget
Waste Collection	£ 2,542,504
Open Spaces	£ 1,713,376
Street Scene	£ 1,148,537
Cleaning	£ 193,651
Depot	£ 33,884
Admin	£ 28,128
General Fund	£ 5,660,082
HRA	£ 517,150
General Fund & HRA Total	£ 6,177,233

Proposed GYS budget 2023/24

3.3 It is however proposed that during 2023/24 several service areas within the new company will be reviewed, such as the current communal waste collection service to reviewing open

spaces services, with a view to reduce cost, and or explore commercial opportunities. These opportunities are explored further in the attached business plan, with the overall aim being to reduce the overall cost of this service for 24/25 and onwards.

Waste Collection	Potential Saving (£)
Communal Waste Collection	184,015
4 day week (Tues-Fri) kerbside collections	30,000
Open Spaces	
Replace Annual bedding with Herbaceous planting	11,000
Grass cutting every 30 days from 21 days	36,800
Closed Cemeteries - reduce grass-cutting from 7 cuts per annum to 4 cuts	11,100
Total (£)	272,915

Potential service savings to be considered during 23/24

- 3.4 Whilst Policy and Resources Committee are being asked to adopt the Business Plan for GYS in relation to 2023/24, the Council will still need to agree the fee it will pay to the GYS as part of the Council's budget setting in February 2023.

4. Risk Implications

- 4.1 A risk register for GYS is currently being developed which will be reviewed regularly by the company board. A risk register is also in place as GYBS expires and the transition between this company and GYS is progressed.
- 4.2 Financially the greatest risk for GYS will be continued pressures that inflation brings alongside the continued growth in fuel and energy costs. It will therefore be imperative that the new company reviews its services during 23/24 with the aim to reduce costs and or generate income to try and mitigate against these pressures.

Areas of consideration: e.g. does this report raise any of the following issues and if so how have these been considered/mitigated against?

Area for consideration	Comment
Monitoring Officer Consultation:	At ELT
Section 151 Officer Consultation:	At ELT
Existing Council Policies:	N/A
Financial Implications (including VAT and tax):	Outlined within report and the attached Business Plan

Legal Implications (including human rights):	N/A
Risk Implications:	Within detailed risk registers
Equality Issues/EQIA assessment:	In place
Crime & Disorder:	N/A
Every Child Matters:	N/A



Great Yarmouth
Services

BUSINESS PLAN 2023/24



EXECUTIVE SUMMARY

Great Yarmouth Services Ltd (GYS) is the Council's new wholly owned company, established to deliver the Council's Waste and Street Scene services from the 1 April 2023. This is an exciting transition for the Council, bringing full control of how these services are delivered to the residents of the Borough directly under the Council's control.

This is the first Business Plan developed by the GYS and intends to build on the quality of the services delivered whilst focussing on ensuring best value is delivered to the Council, alongside developing commercial opportunities moving forwards.

This Business Plan seeks to achieve delivery against the company's overall aim, which is to deliver an excellent standard of service across the Borough, whilst ensuring best value in all that the company does.

The cost of this service to the Council is £6,177,233.41 for 2023/24.

Operational Plans have also been developed. These Plans specify the services that will be delivered by GYS and how these services will be operationally delivered. Performance against this Business Plan and Operational Plans will be reported on a quarterly basis to both the GYS company board and the Council's Policy & Resources Committee.

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1. MISSION STATEMENT

- 1.1. To provide effective and efficient Waste and Street scene services to the residents, communities, businesses, visitors and stakeholders of the borough of Great Yarmouth

2. COMPANY VALUES

- 2.1. In support of our mission, we will ensure that Great Yarmouth Services:

- Undertake Services that are directly under the control of the Borough Council.
- Meet and exceed the Council's aspirations for a 'greener and efficient' service.
- Provide an evolving service which aspires to be the best in the East Anglian Region.
- Identifies opportunities for growth, and maximised returns for investment to the Borough Council.
- Undertaken by local people for local residents.
- Is an attractive organisation to work for and an employer of choice, providing opportunities for training and development while enjoying market terms and conditions.

3. BACKGROUND

- 3.1. Great Yarmouth Services (GYS) is the Council's new wholly owned, TECKAL compliant company which has been established to deliver the Council's Waste and Street Scene services from the 1 April 2023, following the natural expiry of Great Yarmouth Borough Services Ltd (GYBS), the Council's joint venture company with Norse.
- 3.2. On the 9 December 2021, GYBC decided not to continue with the Joint Venture Company Great Yarmouth Borough Services Limited and therefore the partnership agreement with Norse will end on 31 March 2023, with the Council changing its delivery method for the services by creating a GYBC wholly owned Local Authority Trading Company (LATCo) to undertake these operational services from the 1 April 2023.
- 3.3. GYS Ltd was therefore incorporated (company No 14260995) on the 28 July 2022 to provide a range of waste & street scene services on behalf of GYBC under a TECKAL agreement. There are 5 business units which outline and group together the various services GYS will subsequently deliver, these business units are:
- i. **Open Spaces Services** - Grounds maintenance, Leisure maintenance, HRA Grounds maintenance, Grave Digging, Arboricultural services, Tree Management & depot management
 - ii. **Waste Collection Services** – domestic refuse and recycling collections, Garden waste collections, Commercial waste collections.
 - iii. **Street Scene Services** - Street cleansing, building cleaning, HRA Cleansing maintenance, Public Toilet cleaning, Bulky collections & Bin deliveries.
 - iv. **Support Services** - Car Clear, Pest Control, Customer Services, Health & Safety, internal training, project management, business management.
 - v. **Fleet Management** – Transport compliance, HGV & LCV servicing and maintenance, Plant & Machinery maintenance
- 3.4. The Operational Plans for each of the above services are further detailed within the attached Appendices (Appendix 1). They represent the baseline service that will be provided by GYS for the budget as outlined in Section 8 of this Business Plan.

3.5. Service standards and frequencies adhered to by GYS are set out in the table 1 below:

Department	Service area	Frequency
Waste Collection	Residual / Recycling kerbside collections	Alternate weekly collections
	Garden Waste collections	Alternate weekly collections
	Communal collections	Weekly
Open Spaces	Grass cutting – GYBC	Every 21 days – Apr-Oct
	Grass cutting – NCC	Every 21 days – Apr-Oct
	Shrub beds	Inspected every 2 weeks Pruning winter months
	Summer bedding	Maintained weekly & Changed annually
	Spring bedding	Maintained fortnightly & Changed annually
	Recreational spaces (see Open Spaces Operations Plan, Outdoor Leisure 9.2)	As detailed in the Operations Plan
	Tree works	High density areas checked yearly. Tree stock inspected Emergencies works attended
Events	Various events supported by GYS throughout the year.	As outlined in the annual event programme (budget £14k)
Street Cleansing	Apr-Sept (Easter)	06.00-22.00
	Oct-Mar	06.00-17.00
Public Toilets	Unlocking	07.00-08.00
	Locking	19.00-20.00
	Locking Zone A peak season	21.00-22.00

Table 1. GYS Service standards

3.6. GYS will provide a differentiated approach to Street Cleansing services to reflect that there are some parts of the borough which require more frequent cleansing. To assist the process, the following zones were created in table 2 below:

Zone	Description
Zone A	Central business district of Great Yarmouth
Zone B	Primary residential areas
Zone C	Beaches
Zone D	Key Open Spaces
Zone E	Remaining Borough

Table 2. Zone areas

3.7. The frequencies that zones are cleansed are set out in the table 3 below:

Zone	Grade	Frequency
Zone A	Grade A/B	Daily: Grade A achieved by 08:00 – Grade B for the rest of the day
Zone B	Grade B	Weekly
Zone C1	Grade B	Daily: Easter to Sept (inc weekends) half term holidays May and Oct
Zone C2	Grade B	Daily – Apr (Easter) to Sept – Daily – Oct to Mar
Zone D	Grade B	Daily – St George’s Park – Weekly – open spaces within Zones A-C
Zone E1	Grade B	Monthly
Zone E2	Grade B	12 weekly

Table 3. Zone frequencies

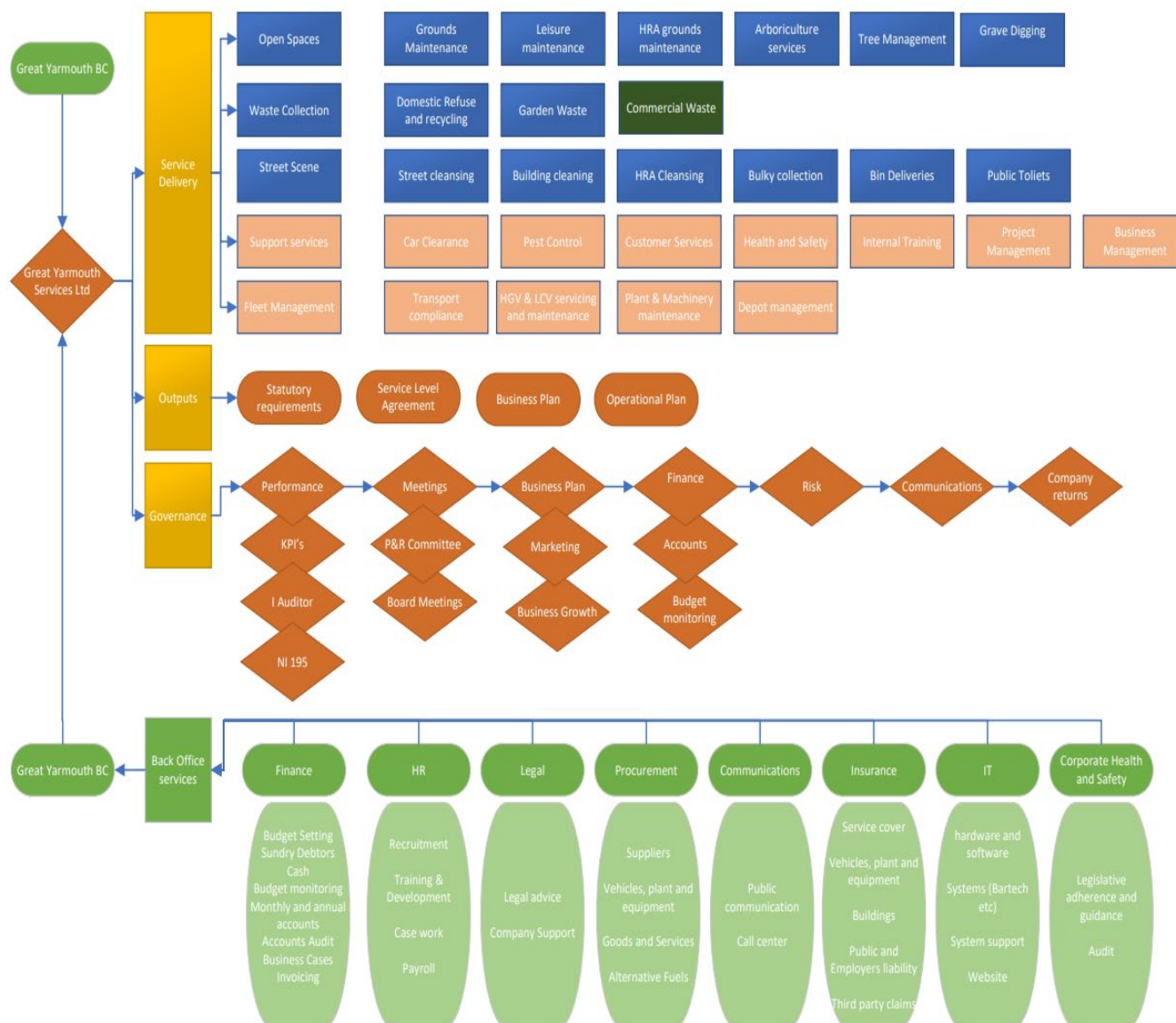
3.8. The zones are outlined in the graphic below, to see the full Borough map, please click on the link below;
<https://gybc.maps.arcgis.com/apps/webappviewer/index.html?id=86b1c4b31db94e2aa6251194425bdbff> .



3.9. If additional services are subsequently developed, an in-year amendment to this Business Plan will need to be agreed with a fully costed proposal.

4. INTRODUCTION

- 4.1. This Business Plan sets out the aims and objectives of both Great Yarmouth Services Ltd (GYS) and Great Yarmouth Borough Council (GYBC), how the company will contribute to them, together with the consequential action plans, performance measures and budget for 2023/24.
- 4.2. The flow chart outlined below depicts the organisational relationships and service delivery between GYBC and GYS.



5. GREAT YARMOUTH SERVICES AIM

5.1. The overall aim of GYS is to deliver an excellent standard of service across the borough, whilst ensuring best value in all that the company does. In achieving this aim GYS will prioritise its activities in line with the Council's corporate plan. 'The Plan 2020-2025'. This document contains four key priorities, each with a clearly identified approach. These priorities are:

- A Strong and Growing Economy
- Improved Housing and Strong Communities
- A Quality and Sustainable Environment
- An Efficient and Effective Council

5.2. GYS will strive to assist with the Council's Medium-term Financial Strategy through identifying budget reductions whilst developing and growing the commercial element of the business. However, it should be

noted that as inflationary pressures continue to grow the scope to make savings diminishes and or provide profit for the Council will become more limited.

6. GREAT YARMOUTH SERVICES ACTION PLAN

6.1. In achieving the overall aim outlined in section three, various actions have been developed to be achieved during 2023/24. The detail of which are contained in the table 4 below.

Action	Timescales	Outcomes	comments
Review Street Cleansing schedules & shift patterns	Apr-Sept 2023	Revised schedules and shift patterns to increase performance and reduce cost	GYS to move towards annualised hours in Street Cleansing.
Deployment of new machinery across the business	ongoing	Replacement/upgrading of equipment to ensure services can be delivered and equipment operates efficiently as possible	Vehicle plant & equipment programme
Commercialisation growth to include commercial waste opportunities	ongoing	To increase income into the new company Business cases to be developed regarding any opportunities	To support budget pressures, including delivering additional services as the tourism season is extended/activities increased
Monitoring of performance against KPI's	Daily/weekly Quarterly	Quarterly reporting to Company Board / P&R Committee	
Monitoring of budgetary performance	Ongoing	To ensure the company can operate within set budgets and to allow for early notification so financial pressures can be addressed	
Resource utilisation	Oct-Mar	To support the Council's net Zero ambitions alongside ensuring the most efficient use of resources	Green Fleet Strategy – Greening the fleet Route Optimisation Bartec rollout
Identify recycling opportunities	Apr-Sept	Increase recycling across the Borough to include commercial recycling opportunities	Resource & Waste Strategy UK.
Identify green energy opportunities	ongoing	To deliver a green solution but to also consider ways to reduce fuel and utility usage/make financial savings	
Communications strategy to include external marketing of the new company	ongoing	To ensure the company has a robust communications strategy for both its workforce, customers and external partners	

Action	Timescales	Outcomes	comments
Training development plan	annually	To ensure the workforce of GYS are adequately trained and opportunities are provided for staff	
Apprenticeships	ongoing	Deliver apprenticeship opportunities across the business	HGV through levy for future proofing
Terms & conditions review	ongoing	Opportunity to review GYS T&C's to better support recruitment and retention	This will be undertaken within the first 6 months of the company going 'Live'
GYS management restructure	Apr 2023	Staff consultation Fit for purpose structure	Repurposing a vacant managers post to a NEW post. Some amendments had to be made to the current structure
Company Board meetings	quarterly	Regular meetings to ensure effective operational delivery of GYS	
Policy & Resources Committee meetings	quarterly	Reporting cycle to ensure regular company updates are received and decisions made in line with the Delegations Matrix	Governance changes to Cabinet system due May 2023
Adoption of new Health & Safety Policy	ongoing	Ensure GYS fully complies with all relevant legislation	
Adoption of all relevant Policies (HR etc)	ongoing	Ensure GYS has all relevant policies in place	
Operator's Licence	Feb 2023	O Licence to be in place	Advert in Mercury Oct 22 Application submitted Oct 22 Monthly TM reports
Consideration to new waste collections rounds/street cleansing/ground maintenance requirements in relation to new Housing developments	ongoing	Ensure service can cope in line with new Housing developments	Section 106
Weekly Food Waste collection service	2024/25	To develop a business case for new food waste collection service	
Development of a 3 year savings plan	Within 6 months	Ensure commercial opportunities/service changes are identified and realised to bring budget within expected growth levels	Will require 'Invest to Save' investment and buy-in from Members.

Table 4. GYS Action Plan

6.2. GYS have a range of methodologies against which to measure, assess and improve performance to achieve the company's aims and actions outlined in the table above have been developed.

Operational Performance

GYS will develop a set of Key Performance Indicators to reflect the priorities of both GYBC and GYS. These are presented in Appendix 2 and will be reported monthly and reviewed at the Company Board meetings and presented to Policy and Resources Committee on a quarterly basis.

Project Register

The Project Register is a live document that outlines the projects and activities that are intended to develop the business and support the identified aim and actions over the course of the year, again reflecting GYBC/GYS priorities. This document is reviewed on a monthly basis and updated/amended as required.

Business Growth

GYS is committed to growing the commercial element of the business for the benefit of the company which will be carried out through finding operational efficiencies and investment in new opportunities which would be subject to Business Case approval with a 3 year plan.

This will also include identifying opportunities for extending a commercial offering of a range of services to external organisations across the borough. These will include Commercial Waste Collection, Open Spaces, and Vehicle Maintenance.

Transport Management – Operators Licence

An operator of heavy goods vehicles, used for hire or reward, is required by law to possess an Operator's Licence (O Licence). The Operator's Licence must have at least one nominated Transport Manager who holds a Certificate of Professional Competence in Road Transport Operations (TMCP). Currently the O Licence holder for GYBS Ltd fleet (OF1025540) is the nominated Transport Manager. The application (**OF2060567/1349821**) for GYS Limited has commenced. Under the terms of the licence the Operating Centre for GYS is listed as, 101 Churchill Road Great Yarmouth NR30 4JJ.

7. COMPANY GOVERNANCE & PERFORMANCE MANAGEMENT

- 7.1. The Company will operate and deliver this Business Plan with agreement from GYS Company Board and Policy and Resources Committee in accordance with the Articles of Association and Delegations Matrix established as part of the new companies' governance structure. The table below outlines these arrangements further:

GYS Member	GYBC Full Council	Role
Delegated Member Authority	GYBC Policy & Resources Committee*	Member
GYS Board Member	Chris Silverwood	Director of Operational Services GYBC & Managing Director of GYS

GYS Board Member	Kate Blakemore	Director & Chair of GYS, Strategic Director GYBC
GYS Board Member	Karen Sly	Director of GYS, Finance Director GYBC
Company Secretariat	Louise Indge	Support Services Officer GYS

**To change in May 2023 due to Council Governance Changes*

- 7.2. The company Articles of Association and Delegation's matrix specify how decisions will be made, with the Council's Policy and Resources Committee required to adopt the new company business plan and ensure the company delivers against this plan. Operational decisions will mainly be made by the company board, with the Director of Operational Services being responsible for the company's day to day activities.
- 7.3. Joint management meetings with GYS and GYBC will continue, with the Council's Waste and Environmental Protection Manager maintaining the client-side link with the new company, providing a conduit for feedback and continuous improvement.
- 7.4. Company performance will be assessed against a range of information:
 - Detailed Performance measures with are SMART (Specific, Measurable, Achievable, Rateable and Targeted)
 - Data collected as part of routine checks across the business
 - Customer services data
 - Health & Safety compliance data, including transport safety data
 - Performance against Operational Effectiveness Action Plans & Business Plan
 - Financial Management data: Report setting out the projected financial performance during the year, on-going financial monitoring and the company annual accounts, and outturn figures presented to Company Board
 - Audit results and compliance achieved against these

8. ENVIRONMENTAL SUSTAINABILITY

- 8.1. Great Yarmouth Borough Council's Sustainability Strategy (July 2022) set the commitment to be a Net Zero local authority by 2035. Through an independent study carried out by the Carbon Trust, the Borough Council identified that its organisational carbon footprint resulted in 7,843.76 tonne of CO₂. The Green Fleet Strategy 2022-2032 developed by GYBC will provide GYS with a framework for the procurement, management, use of new technologies, alternative fuels and disposal of vehicles and fleet assets required by the Council to deliver services daily.
- 8.2. As part of the GYBC's ambition to become carbon net-zero by 2035 there is a need to decarbonise the fleet as much as possible over the coming years. The Green Fleet Strategy lays out the short-term plans based on the limitations of these alternative fuels and the longer-term plan ensures we are in the best position to take advantage of these fuels as they become available.
- 8.3. The operation and maintenance of the fleet costs over £1.1M per annum and the fleet represents a critical corporate asset. Vehicles and equipment must be fit for purpose, offer good value for money and need to be managed effectively to protect the health and safety of both staff and the wider community.
- 8.4. In total GYS's fleet is comprised of 122 assets, 15 narrow body refuse collection vehicles (excluding smaller 7.5t RCVs), 93 smaller vehicles including tractors and mowers with 24 trailers. This fleet strategy

will seek to decarbonise the fleet in the longer term, it will also provide an opportunity to reduce the maintenance costs of managing what is currently an ageing fleet.

9. FINANCIAL CONSIDERATIONS

- 9.1. In establishing GYS a budget for 2023/24 for baseline service provision, has been developed working directly with the Council's finance team. There have been substantial challenges in developing this budget, in part due to the change from Norse supporting GYBS to the Council now supporting this work, with a lack of detail available from Norse to support this process.
- 9.2. Consideration has also had to be given in the following areas as part of developing this budget:

GYBC Funding pressures – local government as a sector has continued to face funding reductions. The future funding gap for the Council remains a risk and whilst the Council awaits details on the funding settlement for local government for 2023/24, it is prudent to financially plan now for growth during this year, alongside seeking savings if possible.

Savings and Efficiencies - GYS will endeavour to deliver savings and efficiencies from a number of projects in line with themes within the GYBS Business Plan 21/22. Savings and additional income have been included in the budgets in previous years and are now part of the overall base budget position. Savings and income from services have been factored into the 2022/23 budget. However, this has been tempered by the cost pressures also factored in which have led to a forecasted loss of £163k for 2021/22.

Loss of 3rd party income – as part of the transition into the new company, existing agreements and income from Norse (for example, for allowing the parking of vehicles on the depot site) is currently being reviewed and may result in these agreements not being renewed.

Commercial Services - being a TECKAL company we will remain cognisant to the boundaries this will place on commercial growth. We do not envisage that that this growth will be exceeded within the period of the next two years; however, any new opportunities which challenge this limit will be managed accordingly to ensure we do not miss those opportunities. That said the company plans to undertake a feasibility study to review the commercial opportunities within the waste collection market during 2023/24.

Inflationary pressures and cost of living – In preparing this budget consideration has been given to inflationary increases, alongside the direct increase in costs in relation to fuel and utilities.

10. GREAT YARMOUTH SERVICES BUDGET

- 10.1. A budget has been prepared for 2023/24 to deliver the current baseline services, by reviewing the cost of the service in relation to 22/23 which has included consideration to inflationary, fuel, utilities, and staffing cost pressures.
- 10.2. Furthermore, it is proposed that budget monitoring for GYS is strengthened, with monthly service accounting meetings being implemented as part of the Council's support for the new company. Quarterly financial reports will also be presented at the GYS company board and the Council's Policy and Resources Committee.

- 10.3. The breakdown in the table 5 below outlines a proposed budget for 2023/24 based on a 3% uplift on the current forecast outturn for GYBS for 2022/23 which doesn't include any mitigation to reduce these costs at this stage, or any revised cost for the new lease arrangements for the company assets.

Service Area	23/24 Budget
Waste Collection	£ 2,542,504
Open Spaces	£ 1,713,376
Street Scene	£ 1,148,537
Cleaning	£ 193,651
Depot	£ 33,884
Admin	£ 28,128
General Fund	£ 5,660,082
HRA	£ 517,150
General Fund & HRA Total	£ 6,177,233

Table 5. GYS budget 2023/24

11. SERVICE REVIEW

- 11.1. A review of the service areas has been carried out, looking at budgets versus actual costs for the services provided, to establish if efficiencies can be made whilst also making sure the company is not making any losses on service provision and/or picking up extra costs outside of budget.
- 11.2. The budget for 2023/24 required growth, due to increases in staffing costs and the price of fuel, so for setting this budget, the GYBS 22/23 forecast was used plus a 3% uplift, based on outturn from the existing Partnership Fee.
- 11.3. Some services currently provided are running at a loss as detailed in table 6 below, this is due to increased service requirements driven by GYBC, and previous cost cutting exercises within the Joint Venture.

Street Scene	Budget 22/23 (£)	Forecast 22/23 (£)	Estimated Loss (£)
Town Hall Cleaning	35,414	62,708	27,294
Public Toilet Cleaning	127,086	155,009	27,923
Fly Tip removal	85,371	146,466	61,095
Open Spaces			
Bowling Greens	23,881	54,014	30,133
GYS			
Events	£13,900	TBC	TBC
Total (£)			146,445

Table 6. GYS service review

- 11.4. A decision will be required by GYBC to continue with service levels over and above the current budget provision, and how these services should be funded in the future.
- 11.5. In year savings identified in table 7 below will require a business case, and invest to save strategy for example:
- Communal Waste Collection - this will require full consultation to overcome many years of poor behaviours with regard to Waste collection and Recycling. The complexity with behavioural change will require robust communications plan, reorganising collection schedules and frequencies as well as infrastructure requirements for access i.e. double yellow lines. There will also be an impact on GYBC

services i.e. HR & Finance departments in support of this work and therefore with this and the complexities it will be very difficult to deliver within the financial year 2023/24.

- 4-day working week within Waste Collection will require full consultation. The key aspect of this will be an invest to save business case requiring purchase of route optimisation software to reorganise the rounds, marketing materials and consultancy for the project.

Waste Collection	Potential Saving (£)
Communal Waste Collection	184,015
4 day week (Tues-Fri) kerbside collections	30,000
Open Spaces	
Replace Annual bedding with Herbaceous planting	11,000
Grass cutting every 30 days from 21 days	36,800
Closed Cemeteries - reduce grass-cutting from 7 cuts per annum to 4 cuts	11,100
Total (£)	272,915

Table 7. Potential service savings

- 11.6. Any proposed service changes or improvements will be subject to the development of a business case, which will be presented to the GYS Company Board, for approval. Depending on value, this may also require further approval at Policy and Resources Committee as the member of the company.
- 11.7. Any new initiatives or service changes may require further investment. These proposals will be developed on an invest to save basis with supporting business cases to be approved at Company Board.
- 11.8. Other ideas to put forward for savings; 3 or 4 weekly kerbside Residual Household waste collections, a project which could deliver significant savings, but which are unknown at this stage due to the amount of work required and which is a radical change for residents, but nonetheless would deliver savings, again this would be very difficult to deliver within the financial year 2023/24.
- 11.9. A three year savings plan will be developed during the first six months of operation of the company. This will identify those potential commercial opportunities and service changes, which with the appropriate 'Invest to Save' investment (as required), and member approval will generate savings to meet future budget requirements of the service.

12. KEY RISKS AND MITIGATING ACTIONS

- 12.1. In developing the Business plan for GYS, a robust approach has been taken to identify the risks to the company, both in the short and medium term. They have also taken due regard to the Councils Corporate risk register and built into a new risk register for GYS (Appendix 3). The risk register also identifies those risks associated with the proposals around 'Service Review' as outlined in Section 9.
- 12.2. The top three risks for GYS are summarised as follows:
- Increase in fuel, energy costs and inflation. These are externally driven and have a major impact on the financial delivery of the service and will impact on any budget savings required by GYS; Monthly budget monitoring and inclusion in all quarterly company updates will be in place to ensure any mitigating actions can be taken swiftly.
 - Lack of resources to meet demands of service This is both an issue related to that of an ageing workforce and the ability to attract staff into the industry; A review of the companies Terms and Conditions will help mitigate this risk.

- Increasing demands on service driven by property growth and population within borough, this will always be a factor from increases in both the population growth, and new housing developments across the borough. Work will be undertaken during 2023/24 to mitigate against this growth including a review of how section 106 monies can be used to mitigate against this.



APPENDIX

APPENDIX 1: OPERATIONAL PLANS

OPEN SPACES

1. Grass cutting (Highways & General (Urban) Open Spaces).

- 1.1. The grass verges within the urban environment such as margins of non-trunk dual carriage ways will be cut on a performance basis.
- 1.2. To ensure effective sightline cutting on highway verges GYS will provide a safety margin on the edge of roads and sightlines. The work will be carried out on two occasions during the growing season. The area of cut is defined as a minimum distance in from the kerb of one metre, or on banks and hedges up to a height of 2.5 metres. This also includes sight line areas created where highways meet, and various areas found in the built environment or at junctions of roads. The aim is to cut back larger areas on sight lines to allow good visibility in either direction.
- 1.3. GYS shall liaise with other agencies to try and achieve co-ordination of other grass verge maintenance. This includes Norfolk County Council, Highways England and – where relevant – private landowners. Grass verge cutting on council owned land will endeavor to co-ordinate with litter picking and grass verge cutting on non-council owned land.
- 1.4. To achieve this GYS will cut highways and associated general urban open space grass areas 12 times per year, with a target of 21 days per cut within the months of March to November inclusive. (Note: allowance for 1 additional cut if growing season extended).

2. Weed control (GYBC sites only)

- 2.1. GYS in conjunction with the requirements of the specification shall keep all paved and metallic surfaces on GYBC owned roadways, gulley's and footpaths clear of unwanted grass, weeds and moss. This will include the removal of both growing and dead vegetation, and will require the use of herbicides, but only on non-natural surfaces, GYBC will instruct this as additionally paid works.

3. Shrub beds

- 3.1. We intend to achieve strong healthy and stable shrubs, cleanly pruned to good horticultural practice and of an appropriate shape and size for their location and to keep all areas weed and litter free. Where necessary, GYB Services will advise the council of any recommended refurbishment which would fall outside the scope of normal maintenance (i.e. capital or special works) for consideration/funding.
- 3.2. Shrubs and climbing plants shall not be permitted to encroach over footpaths, roadways, sight lines, borough boundary signs, notice boards, signs, furniture and grass areas. Those growing near windows of buildings shall be maintained at windowsill height unless otherwise instructed in writing by the council. All arisings are to be disposed of by GYS.
- 3.3. GYS shall remove any self-set tree or shrub including roots. Where the roots cannot be removed, stump killer shall be applied. GYS shall include in the service charge the supply and mulching of all shrub beds once per year. Bark mulch shall be spread evenly over the entire bed. Shrub beds shall be kept free of litter at all times and shall be inspected in October of each year by GYS and dead, diseased or damaged plants that require replacement will be replaced with the same cultivar of an appropriate size.

4. Ornamental flower beds

- 4.1. The formal rose beds at the crematorium at Gorleston will be maintained beds to an 'ornamental' standard. Where necessary, GYS will advise the council of any recommended refurbishment which would fall outside the scope of normal maintenance (i.e., capital or special works) for consideration/funding. GYS shall ensure that all rose beds are maintained in an attractive condition, free from weeds, fallen leaves, dead or dying plant material, litter and debris. The dead heading and shaping of roses at the crematorium will be undertaken at least twice per week or more frequently where there is water or other damage to blooms.
- 4.2. Rose beds will be fed at least once per year, or more often including mid-Summer if growth slows, with specifically prepared rose fertilizer at a rate of 100g per square metre and mulched to a depth of 8cm annually but keeping mulch at least 10cm away from the stems.
- 4.3. GYS will develop specific plans for the ornamental flower beds on the seafront/promenade area of Gorleston. Specific proposals within the annual Operational Plan shall be developed to provide colourful and attractive flower beds in these specific areas.
- 4.4. To achieve the standards bedding will be maintained as follows:
- Spring bedding: October- Bed clearance, preparation and planting: maintenance fortnightly through to May.
 - Summer bedding: May - Bed clearance, preparation and planting: maintenance weekly through to October

5. Herbaceous plants

- 5.1. All herbaceous planting will be maintained free of weeds by appropriate cultivation throughout the year, without damaging plants or surrounding grass edges.

6. Hedge maintenance

- 6.1. GYS will provide strong healthy and stable hedges, cleanly cut and of an approved shape and size. All arisings shall be disposed of by GYS and will also trim and prune all hedges to encourage a stable hedge. This shall cause minimum disturbance to nesting birds and wildlife in compliance with the Wildlife & Countryside Act (1985).

7. Cemeteries

- 7.1. Services will be provided between the following hours:

Service Description	Commence	Finish
Grounds Maintenance	07:30 hrs	16:30 hrs
Opening and closing of cemeteries		
Summer (BST)	07:30 hrs	19:00 hrs
Winter (GMT)	07:30 hrs	16:30 hrs

Chapel of Remembrance:		
Summer (BST)	07:30 hrs	19:00 hrs
Winter (GMT) Open only except weekends and public holidays where close BST 19:00 and GMT 16:30	07:30 hrs	N/A

- 7.2. The works will usually be carried out during normal working hours, although work outside normal hours may occasionally be necessary to complete the filling and tidying up of graves and surrounding areas. A mechanical excavator will be provided which is suitable for the prevailing ground conditions. Any damage caused to grass areas and edges by the contractor will be reinstated at the expense of GYS. It may be necessary where a grave is subject to additional internments, that these will be dug by hand and also occasionally when re-opening graves.
- 7.3. All graves will be fully dug to the correct dimensions 24 hours before the cortège is due to arrive. All graves will be fully dressed and prepared for the burial service no later than one hour before the cortège is due to arrive. Occasionally on Saturday morning burials/cremations may take place, for which cover is necessary. This will be at additional cost.
- 7.4. All graves will be excavated following the ICCM Code of Safe Working Practice for Cemeteries, by staff qualified through the Cemetery Operatives Training Scheme. Before carrying out any excavation, GYS shall examine adjacent memorials to ensure that they are in a safe condition. In the event of any memorial being unsafe the GYS shall immediately inform the council. Any damage or spoiling of memorials as a result of these operations will be made good by the GYS at their own expense.
- 7.5. Having completed the excavation, the grave will be covered with a lockable grave cover to remove any element of danger to persons entering the cemetery. Uncovered excavated graves must never be left unattended, except for 30 minutes prior to burial.
- 7.6. During the burial GYS will ensure that at least one member of staff is present within sight of the cortège to provide any assistance that may be required. Any staff not directly required will remain out of site of the mourners and no mechanical operations shall be undertaken within the hearing of the mourners.
- 7.7. From time-to-time GYS may be required to carry out an exhumation. GYS will carry out cremated remains exhumations and full body exhumations. This will be at additional cost. Removal of remains will take place in accordance with conditions of the license issued by the Ministry of Justice, the Faculty issued by the Church Authority and the ICCM Exhumation Handbook.
- 7.8. Exhumations will take place, having first checked the documentation and identified and confirmed the correct position for the plot. If there is a plaque or vase upon the plot, GYS will carefully remove and place it to one side. The plot must be fully prepared 30 minutes prior to the appointment time. Having completed the exhumation, the site should be left clean and tidy.
- 7.9. Specific provision will be made for headstones and memorials. GYS will undertake regular inspections of headstones and memorials.
- 7.10. The council and GYS have worked with the Great Yarmouth Preservation Trust and others to create spring and summer flowering plants in the cemeteries.
- 7.11. The Crematorium Garden of Remembrance and Main Drive grass areas are classified as 'Cemetery Lawn', cut 36 times per year, with a target of 7 days per cut. This is done within the months of April to November inclusive. The Cemetery Standard level of service is 7 cuts (1/month, April-October inclusive).

8. Arboricultural services

- 8.1. GYS will provide an arboricultural service of a high standard. All arboricultural work will be undertaken in accordance with relevant legislation and current arboricultural best practices including BS3998:2010 (Tree Work Recommendations). This also includes Regulations, Codes of Practice and Guidance notes provided by the arboricultural industry. Tree operations carried out by GYS will focus on retaining existing trees in accordance with the above standards.
- 8.2. All tree work operations will be undertaken by staff with NPTC/LANTRA/IPAF qualifications (or equivalent), with necessary registration being maintained throughout the period of the agreement.
- 8.3. All trees and woodlands within the council's ownership will be surveyed on a regular programmed cycle. All trees will be surveyed every three years. Trees in Zone 1 areas will be surveyed annually with trees in Zone 2 sites surveyed once every three years, with a third being done each year. The survey program is currently being developed.
- 8.4. We will focus primarily on statutory and essential management of trees. We will not undertake inappropriate management practices that will have a negative impact on the health and amenity value of trees. We will also provide a 24/7 emergency callout service for the council.

9. Outdoor leisure

- 9.1. GYS are responsible for a range of services related to outdoor leisure facilities.
- 9.2. The service currently maintains and manages:
 - 18 full size football pitches,
 - 4 mini pitches,
 - 2 rugby pitches,
 - 2 cricket squares,
 - 6 bowling greens,
 - 1 athletics track & field,
 - 1 pitch & putt course,
 - 1 4G multi sports area,
 - 3 Tennis courts
 - 1 putting course,
- 9.3. Together with the associated facilities and operations (i.e. changing rooms, attendants). Fixtures are received from football, athletics (including Schools), cricket and bowls clubs. Any additional facilities will require pricing and agreement and an order for the works to be undertaken.

10. Hiring and fee collection

- 10.1. GYS are responsible for letting sports pitches and managing their use.
- 10.2. Whilst striving to maximize the use of sports pitches, GYS will take into account the playing capacity of the pitches and the weather conditions at the time of hire. It will be GYS' responsibility to regulate the use to avoid over wear which results in serious damage to the sports pitches and to call off matches.

- 10.3. GYS will keep a record and proper account of financial transactions as necessary for the purpose of accounting and internal and external audit. We will report to the council on the level and intensity of use and the development of future recreational, community, cultural and sporting use of council facilities.

11. Management of the sporting surfaces

- 11.1. Any items of lost property found by GYS employees in any building or facility provided by the council shall be handed to the council or their representative as soon as possible and a written receipt therefore obtained.

12. Maintaining the playing surface areas

- 11.2. For all sports pitches/grounds/playing surfaces an even sward shall be maintained in a healthy and vigorous condition free from weeds. A true and flat playing surface will be maintained with no holes or undulations that are likely to cause injury to players. Adequate soil drainage will be maintained. Pitch markings will be maintained in accordance with FIFA regulations (or other relevant sporting body e.g., ECB) without the use of additives that may prove detrimental to the sward.
- 11.3. Goal posts, crossbars and nets will be supplied and erected. During the close season they will be removed for storage.
- 11.4. Specific grounds maintenance provision should be undertaken for the Wellesley Road football pitch. This will be maintained to the Football Association's National League Step 5 standard.
- 11.5. On some sports grounds, football and cricket share the same area at the end of the season. In such circumstances, football is to be given priority in April, and cricket is to be given priority in August. All maintenance will be carried out in line with ECB guidelines. The cutting of cricket squares and outfielders will follow the Grass Cutting Specification in the Operations Table for timing of this operation. Where there is more than one user of facilities, GYS will need to clearly communicate with all parties about fixtures in order to avoid clashes of bookings.
- 11.6. Bowling green grass cutting will be undertaken to the standards set. Specific maintenance provision will be undertaken ahead of the annual Great Yarmouth Festival of Bowls on the Britannia Bowling Greens on Great Yarmouth seafront to ensure all bowling greens are prepared at least one week ahead of the festival to the agreed standard. GYBC will liaise with the bowls club two months ahead of the festival.

12. Capital works

- 12.1. GYS will provide the council with services which are planned works beyond the nature of routine repair and maintenance at the request of the council. These may include, but not limited to landscaping (including tree and hedge planting design and preparatory works).
- 12.2. GYS shall inspect and price such the works to deliver these services in a timely and efficient manner. These items will feed into the council's annual capital plans.
- 12.3. Costed estimates for capital works will be provided within an agreed timescale. On some capital projects an estimate might be required as a matter of urgency due to health and safety issues or the nature of the risks associated. Such works may be urgently required under this provision.

HOUSING SERVICES (OPEN SPACES & STREET SCENE SERVICES)

1. Communal Areas

- 1.1. Services will be delivered between 07:30 and 16:00. An out of hours service is provided for emergencies only (where there is a health and safety risk to the public).
- 1.2. Garden teams currently use the Love Clean Streets App (Housing Services) to report issues/improvements identified in communal areas and action jobs raised by others in their next cycle of works or immediately if requested by Estate Services Support Officer (photographing works completed and closing/completing job). This may be replaced by using Bartec subject to operational issues being agreed by both parties.
- 1.3. Gardeners will provide support to resident groups to facilitate communal improvements and return non maintained areas as instructed by Estate Services Support Officer and at no additional cost to GYS. This could impact timescales set by GYBC housing and will be managed through joint agreement with impact consideration.
- 1.4. Daily worksheets submitted to Tenancy Services through Neighbourhood Team email to support resident communication.

2. Grass Maintenance

- 2.1. The standards of grass cutting for a range of different grounds types is set out below. This will include biodiversity approach to grass area maintenance where locations are agreed by both organisations. The height of the first cut of the spring season will be set in order that the grass is “tipped” i.e. in two stages. GYS will provide sufficient manpower (subject to budget agreement by Tenancy Services Manager), without removing staff from other operations of the services, and machinery, to catch up if there is a substantial amount of mowing time lost through bad weather. GYS will co-ordinate this with the overall Grounds Maintenance Operational plan in order to obtain efficiencies, based on undertaking 13 cuts per annum on a 3-week cycle. Health and Safety issues will be actioned immediately following report of issue.
- 2.2. GYS will remove grass and debris from all hard surfaces and will inspect all grass areas prior to each maintenance operation and shall remove all stones, litter, molehills and other deleterious material to an authorised disposal facility.
- 2.3. Except for highway areas GYS will maintain the grass edges of beds, hedge bases, hard surfaces and channels to their original and defined shape and dimensions. Once every year bed edges, tree pits and hedge bases shall be cut vertically to a depth of 100mm in relation to the surrounding surface, using a half-moon edging tool or an approved machine, retaining the original shape and dimensions.

Weed control

- 2.4. GYS will keep all paved and metalled surfaces, including gully's; external balconies and footpaths clear of unwanted grass, weeds, leaves, blossom, fallen fruit and moss on each occasion where works are undertaken. This includes the removal of both growing and dead vegetation and may require the use of pesticides as well as manual removal.

Shrub beds

- 2.5. The Operational Plan for any year may make proposals for the renewal or replacement of shrub beds and this will refer to changes in planting due to the failure to thrive or death of plants due to soil, water or exposure to the elements. Such proposals will be drawn up, discussed and agreed at the Housing Liaison

Meeting, together with identification and agreement of any additional funding necessary for significant or Capital works outside the scope and budget of normal new company activity.

- 2.6. GYS will remove any self-set tree or shrub including roots. Where the roots cannot be removed, stump killer shall be applied. GYS shall include in the service charge the supply and mulching of all shrub beds as necessary to maintain a depth of 75mm. Bark mulch shall be spread evenly over the entire bed. Shrub beds shall be inspected in October of each year by GYS and dead, diseased or damaged plants that require replacement will be replaced with the same cultivar of an appropriate size.

Hedge maintenance

- 2.7. The specification is intended to provide strong healthy and stable hedges, cleanly cut and of an approved shape and size. All arisings shall be disposed of by GYS and will trim, prune all hedges to encourage a stable hedge. This shall cause minimum disturbance to nesting birds and wildlife in compliance with the Wildlife & Countryside Act (1985). Unless specifically agreed with the council the height and depth of hedges shall be maintained at a consistent level.
- 2.8. GYS will cut back the current growth to the point of the previous cut, and the hedge will be trimmed, pruned back to the same height, width and general shape as that which existed at the completion of the last trim. GYS shall ensure sight lines remain unobstructed including encroachment onto pathways, windows and handrails, based on undertaking 1 cut per annum.

3. Snow & Ice

- 3.1. Communal grit bins to be filled as requested by Estate Services Team, with orders raised in accordance to supplies required.
- 3.2. All gardening teams to support with gritting if weather conditions/staffing levels do not allow works to be delivered by the Estate Caretaking team.

4. Tree Maintenance

- 4.1. Refer to Section 11 of the Open Spaces Operational Plan.
- 4.2. Tree teams will use the Love Clean Streets App (Housing Services) to report issues/improvements identified in communal areas and action jobs raised by others in next cycle of works or immediately if requested by Estate Services Support Officer (photographing works completed and closing/completing job). This may be replaced by using Bartec subject to operational issues being agreed by both parties.
- 4.3. Landscape changes (tree removal/replacement) will be reported through the Report It GY App.

5. Street Scene Services

- 5.1. GYS will support GYBC in providing a coordinated approach to the reporting, investigating and removal of fly-tips and items left in communal areas, including stairwells and landings (Using the Love Clean Streets App). This includes supporting the evidence gathering process for council enforcement action on fly-tipping. Removal of items is agreed by Caretakers prior to the report being sent to clearly define what items need to be removed. Any investigations will be completed by Housing staff that discover items unless causing a potential health & safety issue before the report is sent to GYS for removal.
- 5.2. Graffiti and fly posting will be requested for removal from street furniture (including stairwells) as and when it is identified as part of an ad hoc chargeable service in accordance with the following:
 - General anti-social graffiti within three working days of an incident being reported.
 - Racist or offensive graffiti or fly posting, within twenty-four hours of notification.

- 5.3. GYS are responsible for the cleaning of the windows in communal areas to a required standard each quarter and is reviewed annually.

6. Cesspool and septic tank emptying

- 6.1. GYBC will be responsible for the collection of sewage from septic tanks and cesspits which is contracted to GYS, its lawful disposal of liquid waste to an authorized site and the servicing of pools/pits and tanks. A regular service will be provided on weekdays between 07.00 and 15.00. Housing tenants using the service will be provided with a schedule of emptying dates. An emergency service will be provided as soon as possible.
- 6.2. Work will be undertaken in accordance to location/schedules provided by GYBC. Emergency emptying will be undertaken as requested by residents. Emergency emptying charged separately (£182.80 per request - £275.60 out of hours).

7. Pest control

- 7.1. GYS will provide a pest control service on behalf of the council for the control of rodents in domestic premises. This service is made available not just for council housing tenants but for borough residents generally (as a paid for service).
- 7.2. The Pest Control operative will be trained to a high level including an RSH Diploma, BPCA 1&2, cover pest controller has Kill germ training, and be holders of current certificates of competence in Wildlife Management, Safe Handling of Pesticides and Pest Control Management. Operatives should also be trained in H & S risk assessment.
- 7.3. GYS will arrange appointments within two working days of the initial contact with the customer and take payment for the service and then arrange to undertake a survey within a further working 3 days. GYS shall make a follow up visit within 10 working days of the commencement of the treatment to confirm the effectiveness of the treatment and where necessary undertake further treatment to eradicate the pests. Additional visits shall be made until it is confirmed that the infestation has been eradicated. For the avoidance of doubt, no additional payment shall be made by the customer or the council for subsequent visits and treatments.
- 7.4. GYS will report conditions thought to be associated with an infestation such as a hygiene issues, rubbish accumulations, hoarding, building and drainage defects to the council's Estate Services Manager within 2 days of the initial survey.

8. Gapton Hall Gypsy & Traveller Site – Street Cleansing

- 8.1. GYS provide an outcome cleaning service for the two communal shower/toilet blocks; office; community cabin and all communal areas within council ownership to provide a clean and pleasant environment for the local community and staff.
- 8.2. GYS will not remove personal possessions from the shower blocks. GYS will notify Gypsy & Traveller Liaison Officers that cleaning could not take place due to excessive items left in the shower block.
- 8.3. GYS shall ensure that warning signs are clearly displayed to advise residents and Council staff of any wet floors which are wet as a result of cleansing operations or emergencies for which they are responsible.
- 8.4. GYS will supply the Council's Gypsy & Traveler Liaison Officers with a schedule of defects found or issues on attendance of the facilities/area on the same day as visiting. If, in the opinion of GYS, any defects found are serious enough to warrant the closure of the facilities at any location then they shall notify the

Council forthwith of the defects being discovered. In such cases GYS may be instructed by the council to close the facility and GYS shall comply with such an instruction immediately at our expense.

- 8.5. GYS shall report vandalism acts of vandalism, or improper or disorderly conduct on the part of any person either within or immediately adjacent to the site, the incident must be reported forthwith to the Council's Gypsy & Traveler Liaison Officers.
- 8.6. Any items of lost property found by GYS employees in the facilities shall be handed to the Council Gypsy & Traveler Liaison Officers as soon as possible and a written receipt therefore obtained.

9. Garden maintenance service

- 9.1. GYS will provide a paid for service to maintain the gardens of tenants (and other borough residents who decide to subscribe to the service). This service shall be on a planned schedule. The council differentiates between smaller gardens (where regular maintenance should take up to 30 mins) and larger gardens (where regular maintenance should take more than 30 mins). The council has provided a schedule of costs for subscribers to the service and this will be updated annually.
- 9.2. GYS will provide an estimate of the scale of regular maintenance to determine which gardens fall into the 'smaller' and 'larger' categories. The number of subscribers receiving the service will be estimated annually in order to be able to calculate the cost of the service and the level of income being generated annually.
- 9.3. GYS will provide a 'one-off' service for residents who do not wish to commit to regular maintenance of their garden but wish to take up a one-off/ad hoc maintenance of their garden. This also includes gardens requiring maintenance following a void period. Garden works will be quoted for based on the condition of the garden and works required.
- 9.4. Provision has been made for quoting for one-off garden maintenance work which should be considered larger than the previous scale indicated i.e. exceptional/large-scale garden clearance for neglected properties and the cost for these will be quoted for on an individually priced basis. For these individually priced works, where this work will be paid for by a resident a written quotation will be provided before any work commences. Where the council will be paying for the work, for example, for a council owned property/asset, a written quotation will be requested before any work commences. Cost for these one-off larger scale works will be outside the Service Level Agreement.

10. Ad hoc services

- 10.1. The council may require ad hoc services from time to time which fall outside of the Service Level Agreement and fall outside of the service charge. These will require additional works including bin cleaning (bins brought to depot, washed and returned); pressure washing (street scene clean ups – i.e. spilled paint; heavy bird mess areas) and other one of non-scheduled jobs. GYS will provide estimates in writing in accordance with the quote sheet and will be based upon good professional judgment and shall utilize pricing guidance any rates set out in the Schedule to this operational plan. Staff providing estimates will be suitably skilled, qualified and experienced to enable estimates to be accurately relied on by the council.
- 10.2. The council is not bound to accept any estimate and an instruction for the works shall be made through the issue of an appropriate purchase order.
- 10.3. If stairwell clearances are requested each item will be charged at £15.00 per collection/delivery with any additional costs being indicated before removal to support tenant recharge process. If removal identified as a significant operation/cost this will be highlighted to Estate Services Manager and quoted/charged separately. If an item is not at the location requested a reduced cost of £4.50 per visit will be charged and is subject to review, all costs subject to review.

WASTE COLLECTION SERVICES

1. Communal Bin Collection Service

- 1.1. There are several groups of households within the borough. Communal bins and sack collection areas will be provided with a weekly collection of residual waste as pre-determined and agreed by GYBC and GYS, additional collections above what is agreed will be charged at ad-hoc rates. The council will determine and notify GYS of the arrangements it requires for the collection of co-mingled dry recyclable materials from communal bins in advance, any additional collections above what is agreed will be charged for at ad-hoc rate. This service is subject to review in 2023.
- 1.2. Access to some collection points in central areas of Great Yarmouth is restricted by the presence of loose waste and commercial bins. Household collections will not be restricted by moveable obstructions where it poses no potential risk to property, repeat offences should be dealt with by the Enforcement Teams to ensure ease of future collections.
- 1.3. The volume of residual waste removed from bulk containers at multi-occupancy households will be limited to the refuse receptacles, quantity of which is pre-agreed between GYBC and GYS, additional waste must be reported by the crew, or the caretakers and scheduled in for collection at an additional cost to the landowner.
- 1.4. Where containers are located in bin storage areas:
 - GYS will open and/or unlock any gate or door necessary to gain access.
 - Access to such areas shall be along paths etc. provided and shortcuts shall not be taken across gardens, hedges or walls.
 - Prior to the removal and emptying of bulk containers GYS will ensure that any rubbish chute cut-offs are closed.
 - GYS will open the rubbish chute cut-offs again as soon as the bulk container has been emptied and returned to the designated collection point.
 - All containers will be returned to the collection point after emptying.
- 1.5. Communal Bin collections are included within Staff/Equipment/Budget figures for Section 3 (Recycling & Residual Waste) subject to review with GYBC.
- 1.6. Extra collections, some areas receive more than 1 collection per week, a number of areas are serviced multiple times per week with domestic bin empties and cleansing are listed below;
 - Paget Road
 - Princes Road
 - Apsley Road
 - Kent square
 - Camperdown Road
 - Clarence Road
 - Albert Square
 - St Georges Car park off Francis Way
 - St Francis Way
 - Pier Cottages

- York Road
- Lancaster Road

2. Garden Waste Collection Service

- 2.1. GYS will design, develop, implement, operate and maintain a garden waste collection service on behalf of the council. This is a charged for service and the council will notify GYS of the relevant charges, which may vary from time to time. The council will be responsible for the administration of the service, including collecting fees for the service and maintaining agreements with householders subscribing to the service.
- 2.2. The council will keep a record and copies of all such agreements as well as financial transactions as necessary for the purpose of accounting, internal and external audit and reporting to the council on the number of customers and the number of bins being subscribed for as part of the service. The council will also keep records of the number of subscriptions cancelled or not renewed and will be reported to the Liaison Board.
- 2.3. The council offers residents an opt-in chargeable organic waste collection service on a fortnightly basis (excluding the two-week period over Christmas and the New Year) from all households who request a collection. As a result, participating households will receive 25 collections per annum, this may increase to 26 during the contract period. This service will be available to all households in the borough who sign up for the service.
- 2.4. The organic waste collection service list will be reviewed annually as part of this Operational Plan, some changes are seasonal, and this affects the level of participation and the weight of material collected. We shall consider this in the design and implementation of the service. Route optimisation should be considered annually or when number of subscribers exceeds realistic expectations of current resources
- 2.5. The service will consistently be provided on the same day of the week every other week, from 6.30 to 15.30. Except on Bank Holidays where a revised collection schedule will be presented.
- 2.6. The Garden waste service is provided by GYS, waste is taken for disposal or treatment at a waste transfer or disposal facility as directed by the Waste Disposal Authority. All organic waste shall be treated to a BSI PAS 100 standard to ensure a quality end product is produced.
- 2.7. All Collection Schedules can now be viewed in Bartec following the round review project completed in October 2021.

3. Residual and Recyclable Waste Collection Service

- 3.1. The council is keen to increase the overall level of recycling, as a minimum in line with the average percentage of waste recycled by other borough councils. Householdors will be provided with bins for the storage of residual and dry co-mingled recyclables.
- 3.2. The amount of waste presented by the householder should be limited to the contents of the agreed waste containers provided for that property.
- 3.3. Recyclables may be presented in cardboard boxes/clear sacks for collection. Where uncontained recyclables, with the exception of flattened cardboard, are consistently presented GYS shall notify the council who will then contact the householder. This procedure should continue to be used for repeated incidences of recyclables not properly presented and the recyclables shall continue to be collected, at no additional cost to GYS, unless instructed otherwise by the council. Subject to review and the Contamination Campaign.

- 3.4. GYS shall minimise the level of contamination of recyclable materials. This will be achieved by carrying out an inspection of wheeled containers before tipping into the vehicle. Where bins are found to be contaminated GYS shall not empty the bin and record the nature of the non-compliant materials via in-cab devices on the Bartec System. Such a collection shall not be counted as a missed collection.
- 3.5. Houses of multiple occupation will be provided with bins that the council, at its discretion, consider appropriate to the number and tenure of the residents and similar arrangements will be made for flatted properties and some individual dwellings where individual collection arrangements cannot be provided. These are referred to as communal bins, GYBC should provide updated tenure lists annually.
- 3.6. All Collection Schedules can now be viewed in Bartec following the round review project completed in October 2021.

4. Assisted Collection Service

- 4.1. GYS provides an Assisted Collection Service for those elderly or disabled persons who are physically unable to present waste and recyclables at the standard collection points. GYS shall operate this Assisted Collection Service, collecting from the point specified by the Council. This Assisted Collection Service will, at all times be performed with the utmost care and consideration for those residents who receive it. The number of Households receiving Assisted Collections may rise or fall through the term of the Partnership Agreement in response to demographic, policy or legal changes.
- 4.2. Assisted collections are included within Staff, Equipment and budget figures for Section 3 (Recycling and Residual Waste). All Assisted Collections can now be viewed in Bartec following the review in 2021.
- 4.3. A review of the service should be considered bi-annually.

5. Bulky Waste Collection Service

- 5.1. GYS will operate a charged for service for bulky waste collection throughout the borough. Collections shall take place over 5 working days: Monday to Friday. The council will instruct GYS of the charges which are to be levied for the service and these may be varied from time to time. The service will be provided 50 weeks per year excluding Bank Holidays and Christmas unless otherwise agree with the council.
- 5.2. GYS will take into account the changes in waste legislation that affect the bulky waste collection service. Bulky items may be heavy and difficult to move and may require more than one operative to effect collection and may require additional handling equipment, a review should be considered for collection points.
- 5.3. GYS will ensure that no collections are undertaken without payment having been made by the householder. Only those items listed by the GYS at the time of taking the payment and the booking of the service shall be collected by GYS. Items which are not household waste shall not be collected as part of the service.
- 5.4. GYS will endeavour to ensure residents present bulky items for collection at the bin collection points unless otherwise agreed by management or in the case of, registered assisted collections. If in the view of GYS the carrying out of a bulky waste collection is hazardous on grounds of health and safety the householder must be informed immediately. In such circumstances GYS shall make arrangements to carry out the collection in another way, as agreed with the householder at no additional charge to the council or the householder, GYS would require a processing fee.
- 5.5. Wheelie Bin deliveries – This service is now provided by a separate crew through overtime on weekends

6. Clinical Waste Collection Service

- 6.1. GYS will provide a service Monday to Friday, 52 weeks per year excluding Bank Holidays. In times of exceptional volume weekend working may be required. Where reasonably practicable GYS will work to a schedule of collection days to provide residents as much notice as possible. It shall be the case that some collections will be made on a request basis and the council or NHS will inform GYS as soon as practicable of any requests that it receives.
- 6.2. Low risk Grade E clinical waste (offensive waste) can be accepted within standard wheeled bins additional capacity for containment may be provided by the council with GYS paid accordingly.
- 6.3. Except for Grade E waste, GYS subcontract this element out to a local licensed company. Under recently updated legislation this is a chargeable service: GYS re-charge to GYBC on a monthly basis and provide a monthly report showing the number of properties visited.

7. Hazardous Waste Collection

- 7.1. GYS will endeavour to provide a collection service for hazardous waste as requested by residents either inhouse or using reputable local companies.
- 7.2. The council may set a charge for the service which could be subject to further GYS charges and shall be communicated. Any charge may change, and these changes shall be communicated to GYS. On receipt of a request for service GYS shall procure a licensed carrier who will make arrangements for collection and disposal at a permitted site. This service will be procured as a sub-contractor to GYS.

STREET SCENE SERVICES

1. Zoned approach to street cleansing

- 1.1. GYS will provide a differentiated approach to street cleansing to reflect that some parts of the borough require more intensive and more frequent cleansing. To assist this process the council has created the following zones:

Zone	Description
Zone A	Central business district of Great Yarmouth
Zone B	Primary residential areas
Zone C	Beaches
Zone D	Key Open Spaces
Zone E	Remaining borough

- 1.2. The detail of which areas are included within each zone is contained in Appendix 2. A map of the zones can be viewed by using the following link:
<https://gybc.maps.arcgis.com/apps/webappviewer/index.html?id=86b1c4b31db94e2aa6251194425bdbff>
- 1.3. GYS prides itself on the quality of street cleansing in these zones and that they are kept to the appropriate standard. GYS will be using the following national grading guidelines:
- Grade A is given where there is no detritus present on a transect;
 - Grade B is given to areas predominantly free of detritus except for some light scattering;
 - Grade C is given where there is a widespread distribution of detritus with accumulations;
 - Grade D where a transect is extensively covered with detritus with significant accumulations
- 1.4. The council has defined (and GYS have agreed to undertake) the following grade of street cleansing within the zones:

Zone	Grade	Frequency
Zone A	Grade A/B	Daily: Grade A achieved by 08:00 - Grade B for the rest of the day
Zone B	Grade B	Weekly
Zone C1	Grade B	Daily: Easter to Sept (inc weekends) half term holidays May and Oct
Zone C2	Grade B	Daily – Apr (Easter) to Sept - Daily – Oct to Mar

Zone D	Grade B	Daily – St George’s Park - Weekly – open spaces within Zones A-C
Zone E1	Grade B	Monthly
Zone E2	Grade B	12 weekly

1.5. The services will be provided between the following hours:

Service description	Commence	Finish
Cleansing Apr-Sept (Easter)	06:00hrs	22:00hrs
Cleansing Oct-Mar <i>(subject to annualised hours being approved and implemented)</i>	06.00hrs	17.00hrs
Toilet unlocking	07:00hrs	08:00hrs
Toilet locking	19:00hrs	20:00hrs
Toilet locking Zone A peak times	21:00hrs	22:00hrs
Cesspit emptying	07:00hrs	15:00hrs

1.6. GYS will remove all litter, detritus, waste and other debris from the highway and other areas described in this operational plan. Fly-tips and hazardous waste will be scheduled in as ad-hoc if it falls outside of the operational agreement. This will include:

- open/amenity spaces
- clearing leaf, blossom and fruit fall
- collecting dead animals
- collecting items from premises, public spaces, highways, lay-bys, roadside verges, watercourses, etc. Providing it is safe to do so
- clearing sand and tidal debris
- cleansing publicly owned alleyways and town center Rows
- cleansing car parks in the ownership of the council
- cleansing all carriageways, footways and footpaths
- cleansing promenades and associated access ramps, steps, paths shelters and seats
- emptying litter bins
- removing graffiti and fly posters
- removing sharps and needles
- Collection of waste from any events will fall as part of a commercial service

1.7. Cleansing in these areas will include particular attention to the removal of detritus from paved and metalled surfaces at both the kerb line and back lines. The areas included in the cleansing schedule are dependent on land ownership, (anything deemed as private property should be at the landowner’s discretion and charged for accordingly), alleys, recesses and similar openings within the building line, unless privately owned, and between buildings up to 1.2m from the backline of the pavement.

- 1.8. GYS will work with the council to maximize the composting of any organic material collected via the service, including but not limited to leaf fall, fruit fall etc.
- 1.9. All waste arisings collected through the operation of the service will be disposed of as directed by the Waste Disposal Authority (WDA).
- 1.10. Syringes, sharps and needles along with any other drugs related paraphernalia will be dealt as a priority and cleared within 2 hours, during normal operating hours.
- 1.11. All items of litter, detritus, roadkill, fly-tipping and other foreign matter will be removed from the full width of the carriageway, central areas, reservations, islands, lay-bys, access roads, ox-bow roads, drainage channels, pedestrian refuges and junctions by appropriate measures which may require Traffic Management to be decided on an ad hoc basis.

2. Fly-tipping and graffiti removal

- 2.1. GYS will be responsible for the removal of fly-tipped material and general anti-social graffiti within three working days of an incident being reported.
- 2.2. Racist or offensive graffiti or fly posting, and illegal advertising graffiti or fly posting, will be removed by GYS within twenty-four hours of notification.
- 2.3. Environmental Rangers will investigate prior to removal of fly-tips and graffiti being requested. Any environmental crime incidents should be investigated before request for removal is submitted to GYS
- 2.4. Where fly-tipped material is of a hazardous nature GYS will make arrangements for its removal and disposal by a licensed contractor and to do so in the most expedient period.
- 2.5. GYBC will keep records on the removal of all fly-tipped material, including photographs of material before and after it has been removed, and where they believe that there is sufficient evidence to reasonably warrant investigation by the council they will liaise with the GYS, If the council gives an instruction that they wish to investigate a reported fly-tip GYS will use all reasonable endeavors to co-operate with the council.
- 2.6. Where waste such as asbestos and hazardous materials, which will require special requirements for final disposal, is collected as part of this service, GYS shall notify the council in order to determine the nominated site for disposal. In such instances, GYS shall be responsible for completion of all relevant paperwork and will ensure that any material which is hazardous for which they do not hold a license to store is collected and disposed of correctly.
- 2.7. Where chemicals are proposed to be used by GYS to remove graffiti, GYS shall provide the council with COSHH assessments of the chemicals to be used, and the council's written approval must be gained in advance. Any use of chemicals or harsh abrasives on areas that are of historical significance should be pre-authorized in writing by GYBC

3. Litter Bins

- 3.1. The council will purchase and provide all litter bins for the delivery of the service and will be responsible for storage, siting, and removal of all litter bins.
- 3.2. All Litter bin repairs and maintenance to be carried out by GYBC or their contractor, annual cleaning at the end of the season at GYBC's discretion subject to a contractor's quotation charged on an ad hoc basis.

- 3.3. Due to seasonal variations, there are fluctuations in the requirement of litter bins and bin emptying in some areas of the borough. 'Peak Time' will require more frequent emptying of bins especially in Zones A, C and D and additional bins (wheeled bins) as agreed with GYS may be placed at high profile areas to assist with increased footfall.
- 3.4. GYS will empty all litter bins together with any additional litter bins installed by the council with a GYBC approved collection schedule as frequently as necessary to prevent the escape of waste in line with the performance standards, reviewed on annual basis.
- 3.5. Any litter within one meter of the bin will be removed by GYS to ensure performance standards are maintained.

4. Beach cleansing

- 4.1. 'Beaches' refer to the Yarmouth beach between the piers and the tourist beach in Gorleston (Zone C). This also includes their peripheral roads, areas, accesses, (slopes, steps and paths) and car parks. These will be kept clear and meet the required standard outlined earlier each day to Grade B during the cleansing dates indicated in Clause 1.4 of this plan.
- 4.2. Once a year an initial significant cleanse of the beaches will take place. The beaches will be thoroughly cleansed of all litter and detritus, including any and all accumulations of seaweed each calendar year during a 14-day period preceding Whitsun bank holiday.
- 4.3. Promenades and roads which are near to beaches and slipways become covered, on occasions, with quantities of sand, shingle or tidal debris. GYS will clear this material and clean sand shall be returned to the beach. Contaminated sand which has litter & debris present will be removed.

5. Pest Control

- 5.1. GYS will provide a pest control service on behalf of the council for the control of rodents in domestic premises. This service is made available not just for council housing tenants but for borough residents generally (as a paid for service).
 - Fleas
 - Bees, wasps and hornets
 - Cockroaches
 - Carpet moths
 - Carpet beetles
 - Moles
 - Woodworm
 - Fly's/maggots
 - Rats/mice
- 5.2. GYS will provide the council with the following pest control treatments:
- 5.3. The taking of payments for services from service users.
- 5.4. The Pest Control operative will be trained to a high level including an RSH diploma BPCA 1&2 and ATB foundation module, cover Pest Control Operative has Kill Germ training, holders of current certificates of competence in Wildlife Management, Safe Handling of Pesticides and Pest Control Management. Operatives should also be trained in H&S risk assessment.

- 5.5. Unless otherwise agreed in writing by the council the service shall be delivered between the hours of 08:00 and 16:00 Monday to Friday excluding Bank Holidays.
- 5.6. GYS will arrange appointments within 48 hours of the initial contact with the customer and take payment for the service and then arrange to undertake a survey within a further working 3 days. GYS shall make a follow up visit within 10 working days of the commencement of the treatment to confirm the effectiveness of the treatment and where necessary undertake further treatment to eradicate the pests.
- 5.7. GYS will report conditions thought to be associated with an infestation such as hygiene issues, rubbish accumulations, hoarding, building and drainage defects to the council's Area Housing Manager within 2 days of the initial survey.

6. Public Toilet cleaning

- 6.1. GYS provide a public convenience cleaning service for public conveniences within council ownership which will provide a clean and pleasant environment for the users of these facilities.
- 6.2. The entire public convenience will be cleaned including toilets, sinks, any shower areas etc. also replenishing sanitizer and maintaining as directed by GYBC. The service will include the collection, transport and treatment of sanitary waste bins.
- 6.3. As a minimum, each convenience shall be visited, inspected and cleansed in daily accordance with the standards in this operational plan
- 6.4. GYS shall ensure that warning signs are clearly displayed to advise council staff and the public of any wet floors which are wet as a result of cleansing operations.
- 6.5. GYS reserves the right to close a public toilet early should the level of anti-social behavior increase to a level that the staff feel concerned for safety. GYBC will be notified asap of the reason why and time closed.
- 6.6. GYS will supply the council with a schedule of defects found on attendance of the public conveniences as they arise. If in the opinion of GYS, any defects found are serious enough to warrant the closure of the facilities at any location then they shall notify the council forthwith of the defects being discovered.
- 6.7. GYS shall report all incidents of vandalism or antisocial behavior to the Police and the council.
- 6.8. Any items of lost property found by GYS employees in the public conveniences shall be handed to the council or their representative as soon as possible and a written receipt therefore obtained.
- 6.9. In the event of insurance claims GYS shall provide GYBC with any relevant information relating to a claim.
- 6.10. GYS shall supply all materials for cleansing and servicing the public conveniences cleaned by GYS and for the avoidance of doubt shall include all consumables including soap and toilet paper compatible with the holders supplied for the purpose as directed by GYBC. GYS will also supply stock to Winterton, Thurne & Hemsby public toilets that they do not clean to the maximum amount of £250 (subject to review and approval if the budget needs exceed) per block per annum in agreement with GYBC subject to review.

7. Car clearance

- 7.1. GYS will lawfully remove vehicles abandoned on the highway and to gain evidence that the council can use to take legal action against those who advertise vehicles for sale on the highway.

- 7.2. Abandoned vehicles on the highway, council owned land and other land open to the air which meet the requirements of the Refuse Disposal (Amenity) Act 1978 RD(A) Act. The council does not consider that vehicles present on the highway or land open to the air by virtue of road traffic collision or mechanical breakdown are part of the service. These will be dealt with by the Police and the Highway Authority.
- 7.3. GYS will design and operate a service for the identification of potentially abandoned vehicles, subsequent enquiries and processes to remove abandoned vehicles from the highway and other land open to the air under the RD(A) Act. The service will comply with the requirements of DVLA, Norfolk County Council as the Waste Disposal Authority in the design of the service and comply with the requirements of the Data Protection Act in its operation in obtaining data and keeping of records. GYS and the council will authorise named individuals to operate the service on behalf of the council and in particular for the access to DVLA and Norfolk County Council web-based services.
- 7.4. GYS will receive, on behalf of the council, reports of abandoned vehicles from the council, the public and other sources. In the taking of reports of abandoned vehicles sufficient records of vehicle type, model, manufacturer, condition and location will be made to create an appropriate record.
- 7.5. GYS will comply with the requirements of the DVLA in the operation of the Web Enabled Enquiry (WEE) System and shall not use the system for any other purpose. Reports of abandoned vehicles will be investigated and will include the creation of records, the inspection of the vehicle and the fixing of notices and the checking of land ownership as appropriate.
- 7.6. All inspections shall be made within 3 working days of the initial report being received by GYS. Inspections shall include the making of contemporaneous notes and the taking of photographs to a standard that is acceptable to support the making of a statement using Section 9 Criminal Justice Act (1967) and the Police and Criminal Evidence Act (1984) supporting Codes of Practice and Criminal Procedure and Investigation Act (1996).
- 7.7. Where a vehicle is on private land GYS will serve a notice on the owner of the land of the intention to remove the abandoned vehicle. GYS will allow 15 days for the owner of the land to object before taking further action.
- 7.8. All vehicles considered to be abandoned will be subject to an online HPI check before further action is taken. In all other cases GYS shall consult with Norfolk County Council and provide them with such information, including HPI check data, so that they may determine the nature of action which shall be taken.

8. Events

- 8.1. GYBC will provide GYS with a schedule of any such requirements annually, to cater for special events in the borough such as cultural activities, fairs, sports activities or voluntary groups undertaking special clearance and litter picking tasks. GYS will supply labor, vehicles, plant or equipment to undertake, assist or promote clearance operations. These will be provided to GYS via the events calendar and scheduled as ad-hoc, where this is not possible, or any events arise that are not stated in the annual events calendar. GYBC will provide a written request no less than 2 weeks prior to the start of the event.
- 8.2. Events covered by the Partnership Agreement form an Events Plan. This also summarizes the GYS activity required for each event. We recognize the Events Plan will be reviewed, agreed and costed annually. GYBC will provide GYS an updated list of events in advance, currently under review and subject to price changes to be approved.
- 8.3. GYS will arrange for areas affected by activities in the Events Plan, in addition to the standard cleansing schedule, GYS will request areas affected to be cleansed before the event (where required with the

Events Plan), to be litter picked each day of the event, and the day after the event, and all litter bins emptied to maintain the Performance Standards as set out within this operational plan.

9. Dead animal collection and storage

- 9.1. GYS will clear all animal roadkill and animal by-products from all carriageways, beaches and council owned land. All animal roadkill and by-products shall be immediately placed in an approved container. Any removal will be undertaken in a sensitive manner so as not to cause undue distress to residents. Animals will be taken to or collected by a registered disposal contractor, who will seek to contact the owner, and transfer note obtained stating, description and location of collection for our records. Animal will be stored for one month.

10. Civil contingency support

- 10.1. Occasionally GYS will be required to support civil contingency activity undertaken across the borough to respond to a major unforeseen incident. Typically, this may include supporting recovery work around flooding, storm surge or other extreme weather events. GYS will work alongside the council and emergency services to reinstate roads and pathways to at least Grade C in the shortest practical time. If required, GYS will respond to council requests for support promptly
- 10.2. Occasionally GYS will be required to support civil contingency activity undertaken across the borough to respond to a major unforeseen incident. Typically, this may include supporting recovery work around flooding, storm surge or other extreme weather events. GYS will work alongside the council and emergency services to reinstate roads and pathways to at least Grade C in the shortest practical time. If required, GYS will respond to council requests for support promptly.
- 10.3. Companywide response: Resources redeployed as instructed – any operational and budgetary impacts dealt with in accordance with nature/impact of incident in accordance with the GYS Business Continuity Plan

SUPPORT SERVICES

To support the delivery of the range of services that GYS will undertake, the GYS Support Services Team will undertake a range of supporting activities and are outlined as follows:

1. Customer Service Team & Car Clear Co-Ordinator workflow for GYBC

- All Garden Waste admin, calls, renewals, queries, calendars, sack calls and production of delivery notes
- Telephone calls/enquiries for JV and service-related issues
- All general refuse/cleansing/grounds phone enquiries and service request workflow generation
- Recording Fly-Capture Stats from Service Request calls & B-bits
- Payments/ Advice for Rats/Mice inc raising paperwork for Pest Controller
- Payments for new replacement bins - produce delivery/collection notes
- Customer Satisfaction Surveys
- Administration of Bartec system
- Car Clear Customer/GYBC liaison/Admin/Collection notices/liaison with front line staff to photograph/notice. Maintain records and databases/WEEE Checks and associated audits
- Assisted Collection, customer assistance, form issuing & receiving, recording of Data & service arrangements. Additions to crew sheets and periodic mailshot check to see if assisted collections still required.
- Service request related FOI requests
- Maintain robust & effective communication channels, & paperwork distribution
- Input into Service Request system to create workflow from customer requests to produce work requests
- Administration of Contaminated bin Project – producing letters, changing attributes, creating workflow for Env Health Services
- Provide Company Secretariat for new company
- Take, produce & distribute minutes at Op's, manager, JCC & H&S meetings and any other required support
- Record & recharge maintained gardens scheme for housing
- Monitoring Energy/Water consumption

2. Support services directly required for GY Services

- Telephone calls/enquiries for JV and service-related issues
- Compliments/Complaints
- Raising Purchase Orders

- Create In house newspaper
- Visitors/barrier to site
- Type & file company letter/tenders/Quotes
- Ad hoc admin/assistance for dept managers
- Pest call assistance, calls, advice payments and paperwork for non-rodent & commercial jobs
- Mail opening, recording, distributing, franking & taking to PO
- Confirmation of service sheets – missed bin/blocked street/breakdown info and updated daily
- Recording of Planned & Preventative Maintenance on Plant Equipment
- Recording training & toolbox talks, updating database & scanning to HR
- Company vehicle tax & insurance arrangements
- Vehicle Accident Stats
- Employee Accident Stats
- Garage Admin & recharges
- Petty Cash
- Collate produce reports and stats for GYBC liaison
- Arrange hire vehicles
- Mobile/Tablet/Sim ordering, records, invoicing etc
- PPE Stock issuing, recording & ordering – recharging to depts.
- Stationary ordering & Monitoring
- Meeting Room Booking & Preparation, locking & unlocking
- Diesel tank monitoring & recharging
- Recording Front Line staff Holiday logs & Forms
- Printing Toolbox Talks
- Liaising with undertakers re gravedigging requests & associated workflow

3. Current Resource

4 x full time employees & 1 x 22 hour part time employee (with apprentice provision for 23/24 for succession planning)

4. Support Services Manager Role

The Team is lead by a dedicated Manager, who will undertake the following key activities:

- Lead and manage the GYBS Customer Services, Car Clear & Pest Control services, Project Management, IT and Business Support services/teams on a day-to-day basis.
- Management of related GYBS Customer Services, Car Clear & Pest Control services, Project Management IT and Business Support, supporting associated administration requirements to ensure these are provided in accordance with regulations and service standards.
- Deliver an effective, safe, efficient, and flexible operational service in order to meet changing demands and priorities.
- Manage individuals and teams to ensure the most effective and efficient use and deployment of resources to deliver service and commercial priorities.
- Ensure all required individual/team processes and procedures are completed and recorded
- Assist with supporting and develop business opportunities
- Represent the service area at stakeholder meetings to agree priorities and outcomes.
- Ensure that all customer processes and responses are completed in a timely manner and in accordance with agreed procedures and service standards.
- Contribute to the review of the services, its schedules, operations and teams to ensure the effective and efficient delivery of the service, meet partnership requirements and external commercial ambitions.
- Provide support for the alignment of the service across the Company to ensure consistency and effective delivery to meet partnership and other stakeholder requirements.
- As a member of the GYBS Management Team, contribute to the ongoing management and development of the Company, its services, projects and its partnerships throughout the Great Yarmouth Borough area
- H&S Co-Ordination & production of H&S Plans/Paperwork with support from Dept Managers/Supervisors
- Arrange training & ensure robust records are kept
- Assist in the Business Support Needs of Director
- Recording & Production of KPI's, analyse data & report on trends
- Provide Project Management support
- IT application & App Support, liaison with IT Dept

FLEET MANAGEMENT

1. Introduction

- 1.1. The GYS workshop provides HGV and LCV repairs, maintenance, MOT and servicing for the GYS fleet also for customers by qualified HGV technicians and an apprentice, there is a Horticultural technician who repairs and maintains the GYS plant and machinery.

2. Current Resource

- 1 x Transport Manager f/t
- 3 x f/t employees
- 1 x f/t apprentice

3. Transport Manager

- 3.1. Drivers' administration - including the checking of drivers' licences and driver CPC qualifications (DQC), ensuring that the retention of drivers' hours records (no less than 12months) and working time records (no less than 24 months) and both are made available upon request.
- 3.2. Drivers management - ensuring compliance with the driving hours rules (EU or Domestic Hours rules); that drivers record their duty, driving time and rest breaks; to download and store digital tachograph unit data (at least every 90 days) and from the drivers' smart cards (at least every 28 days); ensuring that the following records are retained - drivers' hours, Working Time Directive (WTD), and that they are available to be produced during the relevant period; ensuring that drivers are adequately trained and competent to operate relevant vehicles and equipment.
- 3.3. Driver's operations - ensuring drivers are completing and returning their driver defect reporting sheets and that defects are recorded correctly and cross checked, and that drivers and mobile workers take adequate breaks and appropriate periods of daily and weekly rest.
- 3.4. Vehicle administration - including ensuring that vehicle maintenance records are retained for a period of no less than 15 months, ensuring that vehicles are specified as required and that operator licence discs are current and displayed correctly; ensuring safe loading with appropriate indicators fitted, that tachograph calibrations are up to date and displayed, that there are up to date insurance certificates; a suitable maintenance planner is complete and displayed with preventative maintenance inspection dates at least 6 months in advance, to include the Annual Test and other testing or calibration dates;
- 3.5. Vehicle management - ensuring that vehicles and trailers are kept in a fit and roadworthy condition, that defects are recorded and repaired promptly and where not roadworthy are taken out of service; to make vehicles and towed equipment for safety inspections, service, repair and statutory testing available at the appropriate times and within the notified O-licence maintenance intervals; to liaise with maintenance contractors, manufacturers, hire companies as might be appropriate. Ensuring that vehicles and trailers are parked at the nominated operating centre(s) when not in use. Ensure that motor vehicles and trailers are not overloaded and that all vehicles operate within speed limits.
- 3.6. Licence administration – ensuring that the traffic commissioner is made aware of any relevant matters within 28 days including convictions and prosecutions of the transport manager(s) or drivers and also of my own resignation should I leave the employment of the operator.

- 3.7. Maintain local database of all insurance claims (vehicle, plant, property etc). Lead and manage GYS in house maintenance facilities to ensure efficiency, cost effective service delivery, and compliance with all relevant aspects of associated legislation. Continuously and effectively seek out best value for money where parts procurement, training and 3rd party contractors are required.
- 3.8. Maintain and develop existing relationships with 3rd party customers and explore additional income streams from new 3rd parties. Record and monitor monthly fleet compliance KPI's and report monthly to Managing Director

4. Workshop Supervisor

- 4.1. To ensure all work is carried out in an efficient and timely manner and to ensure vehicle/plant downtime is kept to a minimum and in accordance with governing body requirements. The procurement of parts and 3rd party service providers whilst demonstrating best value for money and service.
- 4.2. Completion of all relevant documentation including vehicle/plant maintenance docs, invoices and timesheets. Continually monitor rate of workflow and inform fleet manager/department manager of any delays in repairs which may have an impact on operations and service delivery.
- 4.3. Carry out QC checks on repairs carried out to vehicles and plant. Inspect, service and repair vehicles, plant and equipment in accordance with legislation and manufacturers guidelines.
- 4.4. Road test of vehicles after repairs to certify roadworthiness. Attend breakdowns and call outs where required. Maintain health and safety compliance within the workshop and report any areas of non-compliance.

5. HGV Technician Role

- Inspect, service and repair vehicles, plant and equipment in accordance with legislation and manufacturers guidelines
- Completion of all relevant documentation including vehicle/plant maintenance docs and time sheets
- Road testing of vehicles after repair (where licence allows)
- Preparing vehicles for annual test to ensure a first-time pass
- Attend breakdowns and call outs where required
- Assist workshop supervisor/fleet manager where required

6. Horticultural Technician Role

- Inspect, service and repair vehicles, plant and equipment in accordance with legislation and manufacturers guidelines
- Completion of all relevant documentation including vehicle/plant maintenance docs and time sheets
- Attend breakdowns and call outs where required
- Assist workshop supervisor/fleet manager where required

7. Apprentice Technician Role

- Inspect, service and repair vehicles, plant and equipment in accordance with legislation and manufacturers guidelines
- Completion of all relevant documentation including vehicle/plant maintenance docs and time sheets
- Road testing of vehicles after repair (where licence allows)
- Preparing vehicles for annual test to ensure a first-time pass
- Assist workshop supervisor/fleet manager where required
- Attend College and other courses as required

APPENDIX 2: KEY PERFORMANCE INDICATORS

	TABLE ONE- DATASETS		
	(A) WASTE		
DS1	Tonnage of Residual Waste	M	No Target - Monitoring Only
DS2	Tonnage of Recycling Waste	M	No Target - Monitoring Only
DS3	Tonnage of Garden Waste	M	No Target - Monitoring Only
DS4	No of Bulky Collections containing 1 -3 items	M	No Target - Monitoring Only
DS5	No of Bulky Collections containing 4-6 items	M	No Target - Monitoring Only
DS6	No of Bins Delivered to New Properties	M	No Target - Monitoring Only
DS7	No of Bins Replacement/Additional Bins Delivered	M	No Target - Monitoring Only
DS8	Total of Garden Waste New Subscriptions	M	No Target - Monitoring Only
DS9	No of Garden Subscriptions in Month	M	No Target - Monitoring Only
DS10	No of Households with Assisted Collections	M	No Target - Monitoring Only

	(B) STREET CLEANSING		
DS11	Number of Flytips reported	M	No Target - Monitoring Only
DS12	Abandoned Vehicles No. of Reports	M	No Target - Monitoring Only
DS13	Abandoned Vehicles No. Removed	M	No Target - Monitoring Only
DS14	No of Abandoned Vehicle notices Issued	M	No Target - Monitoring Only
DS15	No of Abandoned Vehicle notices Placed as vehicles still in situ	M	No Target - Monitoring Only
DS16	Average time taken from first report to visit/notice placed, in calendar days (Car Clear operates Mon-Weds)	M	No Target - Monitoring Only
DS17	Average time taken from Notice placed on vehicle to County Collecting	M	No Target - Monitoring Only
	(C) COMPLIANCE		
DS18	Vehicle/equipment accident reduction	M	Reduction on previous year - Own Fault Accidents
DS19	RIDDOR accident Statistics	M	Target = 0
DS20	Employee accident statistics (excluding RIDDOR)	M	Reduction on previous year
	(D) CUSTOMER		

DS21	Formal Justified Complaints	M	No Target - Monitoring Only
DS22	Compliments	M	No Target - Monitoring Only
(E) VEHICLE FUEL			
DS23	Light Vehicle Mileage (M)	M	No Target - Monitoring Only
DS24	Light Vehicle Fuel Used (L)	M	No Target - Monitoring Only
DS25	Light Vehicle Co2 (KG)	M	No Target - Monitoring Only
DS26	Heavy Vehicle Mileage (M)	M	No Target - Monitoring Only
DS27	Heavy Vehicle Fuel Used (L)	M	No Target - Monitoring Only
DS28	Heavy Vehicle Co2 (KG)	M	No Target - Monitoring Only
DS29	Total Business Miles in Grey Fleet	M	No Target - Monitoring Only
(F) PEST CONTROL			
DS30	No of Rodent Pest Jobs (*no of requests as 3 x visits per request)	M	No Target - Monitoring Only
DS31	No of Pest Control Complaints	M	No Target - Monitoring Only
TABLE TWO- KPI's			Target

(A) WASTE			
KPI1	Missed Bins	M	less than 0.5% of bins collected
KPI2	Recycling contamination rate (GYBC)	M	Downward Trend
(B) STREET CLEANSING			Target
KPI3	Litter-Improved Street and environmental cleanliness - NI 195a Inside Zone 1	M	97% of audited streets cleaned to grade B or above
KPI4	Litter-Improved Street and environmental cleanliness - NI 195a Outside Zone 1	M	95% of audited streets cleaned to grade B or above
KPI5	Detritus-Improved Street and environmental cleanliness - NI 195b Inside Zone 1	M	93% of sites cleaned to grade B
KPI6	Litter - Performance Check (within 24hrs of Cleanse)	M	95% of audited streets cleaned to grade B or above
KPI7	Detritus Check - Performance Check (within 24hrs of Cleanse)	M	95% of audited streets cleaned to grade B or above
KPI8	Reported Flytips removed within 3 working days	M	100% within 3 days
(C) OPEN SPACES			Target

KPI 9	Maintain Verge grass cutting frequency	M	21 calendar days - 90% April/May, 95% June-October inc.
KPI 10	No of Grounds Service, Supervisor, Performance Inspections	M	10 per week; Maintenance to specification
KPI 11	No of Grounds Service, Supervisor, Safety Inspections	A	100%
KPI 12	No of Tree's inspected in line with current Inspection Policy (draft)	M	30%
(D) TOILET CLEANING			Target
KP13	No of Cleanliness of Toilets - Spot Checks - Pass/Fail Against Spec	M	80% Pass
KP14	Cleanliness of Toilets - After a Cleanse -Pass/Fail Against Spec	M	95% Pass
(E) COMPLIANCE			Target
C1	ISO9001 (QMS)	6M	Zero major / < 8 minor non-conformities
C2	Fleet - Operator Compliance Risk Score	A	Maintain GREEN 'Low Risk Operator' rating
C3	No of I-Auditor H&S Inspections undertaken	M	15 p. w
C4	I-Auditor H&S Inspections - % compliance with RAMS	M	100%
C5	Staff Absence - reduce absence levels	M	< 3%

APPENDIX 3: RISK REGISTER

ID	Risk Category	Description	Risk Impact Leads to (results in ...)	Risk Owner	Mitigation Plan
1	Operational delivery	Budget savings required of GYS Ltd by GYBC	Unacceptable reduction in statutory service provision	Chris Silverwood	Budget monitor to ensure that costs are on track
2	Operational delivery	Increase in fuel costs	Increase in budget required to maintain statutory services, or identify where service standard can be reduced	CS	collection routes optimised in 2021 procure more efficient vehicles and new technology for vehicles
3	Operational delivery	Increase in energy costs		CS	office space utilisation-rent out vacant space
4	Operational delivery	Corporate Health & Safety		Kate Blakemore/CS	support and advice to establish systems and approach meet legislation and H&S requirements
5	Political buy in	Change in specification for improved level of service delivery	Increased costs, budget increase needs to be made available	P&R Committee	budget availability from GYBC, need to make choices
6	Operational delivery	Lack of resources to meet demands of service	failure in meeting service requirements	CS	churn of staff linked to level of pay, captured market within Great Yarmouth. Look at workforce planning
7	Operational delivery	Annual Pay award, NJC increase over budget	increased costs, which may impact on trading position	CS	budget monitoring and setting to encompass this
8	Operational delivery	Increasing demands on service driven by property growth and population within borough	failure in meeting service requirements, unless budget available to meet demand	CS	Business plan needs to link to housing growth to trigger budget increase
9	Operational delivery	Investment required to support development of new business opportunities for commercial waste collection	inability to expand commercial offering	CS	New business case will be required for approval and set up separate company when over 20% (additional set up costs for this)
10	Operational delivery	Aging fleet with rising maintenance costs	increased R&M costs and potential service failure which will affect trading position	CS	vehicle replacement programme as part of Fleet Strategy

11	Financial	Drive for Fleet to become greener	increased costs in new technologies which will affect trading position	P&R	vehicle replacement programme as part of Fleet Strategy (aligned with corporate risk register)
12	HR Matters	Review of T&C's for GYS		HR/GYBC	existing conditions as starting point, business case for any change. Need right level of consultation and communication
13	Financial	Current tenants vacate premises, loss of income approx. £48k. And potential loss of maintenance income from minibuses and trade vehicles (NWS HGV servicing R&M £97k)	Impact on trading position	CS	negotiate and formalise agreement with existing tenants. Look at staff levels within Workshops
14	HR Matters	Harmonisation and rationalisation of working hours across the service areas		HR/GYBC	transfer on existing
					harmonising within pool of people within GYS
					Opportunities in future to change (improve recruitment/management)
15	HR Matters	Annualised hours in Street Cleansing to cover seasonal demands (40hr summer/ 30hr winter)		CS/HR	transfer on existing
					harmonising within pool of people within GYS
					Opportunities in future to change (improve recruitment/management)
16	HR Matters	HGV drivers nearing retirement age	national HGV driver shortage	CS	need to train more (funded) from within the team, combined with apprenticeships
17	Operational delivery	loss of vehicle workshops		CS	business continuity plan - support from local garages
18	Operational delivery	loss of office accommodation at depot		GYBC	work from home or other premises
19	Operational delivery	O Licence application - direct impact on service delivery and transport compliance		CS	apply as early as possible to ensure in place
20	Support Services	support services set up for new company		Karen Sly	reviewing staffing levels, and possible use of temporary staff

21	Support Services	setting up financial systems for company, HR support		KS	potential to process outside system in the short term, or external provider
22	Communications	communications about new company service delivery		CS	within Comms plan
23	Operational delivery	Fleet requirements for 1st April start - extension of lease for vans from Norse/hire/ purchase of new vehicles	service failure	CS	Request to Norse to extend lease on the 21 vans on a monthly basis until replacements are delivered. Procurement commenced (27SEPT) further to GYBC approval for £650k capital
24	Operational delivery	UK Waste and Resources Strategy		CS/P&R	Will require investment for new vehicles and additional resources to meet requirements for waste food collection in 2024. Business case required to ensure budget provision.
25	Service Review: Communal Waste Collection service	Methodology encourages 'fly typing' by using 1100L wheelie bins. Additional service costs to standard collection service	Service currently being undertaken, but the costs are more than existing budget provision	CS/JH	Potential saving available from review of service and implementing robust service standards to be adhered to
26	Service Review: Town Hall Cleaning	Service currently undertaken at a loss	With budget constraints, service levels need to be reviewed	CS/JH	Review of current service level and contractual commitments to realign budgetary deficit
27	Service Review: Public Toilet Cleaning	Service currently undertaken at a loss	With budget constraints, service levels need to be reviewed	CS/JH	Service heavily dependant on overtime, propose review to convert overtime spend to FTE, dropping OT cost by 1/3 and allowing more resilient service delivery

28	Service Review: Fly Tip Removal	Service currently undertaken at a loss	With budget constraints, service levels need to be reviewed	CS/JH	Propose Fly-tipping to be dealt with at enforcement level, set acceptable threshold and anything above threshold to be charged at commercial rate.
29	Service Review: Market Cleaning/ waste service provision	Service provided, currently exceeds the standards for the town area. Market traders disposing of waste, which should be charged for as commercial waste	With budget constraints, service levels need to be reviewed. Commercial charges should be made to market traders	CS/JH	Compete review of service and market boundary needed to demonstrate value for money for traders, commercial rate charged for service
30	Service Review: Replace Annual bedding with Herbaceous planting	May receive negative comments on how the town looks.	With budget constraints, service levels need to be reviewed.	CS/PK	Potential for cost savings, however need to balance against public perception.
31	Service Review: Grass cutting every 30 days from 21 days	Reducing Grass cutting frequencies may receive negative comments and complaints	With budget constraints, service levels need to be reviewed.	CS/PK	Potential for cost savings, however need to balance against public perception. Impact on tourism and visitors if Bowl greens were closed, GY hosts one of the biggest tournaments in the UK.
32	Service Review: Closed Cemeteries - reduce grass-cutting from 7 cuts per annum to 4 cuts	Reducing Grass cutting frequencies may receive negative comments and complaints	With budget constraints, service levels need to be reviewed.	CS/PK	Potential for cost savings, however need to balance against public perception.
35	Service Review: Bowling Greens	Service currently undertaken at a loss	With budget constraints, service levels need to be reviewed, and appropriate budget allocated to meet required service level.	CS/PK	Potential for cost savings, however need to balance against public perception.

36	Service Review: Annualised Hours- Street Cleansing	Currently work pattern does not meet the required cleansing standard for summer peak season. Additional costs from overtime working	With budget constraints, service levels need to be reviewed	CS/JH	Annualised hours working pattern will provide the required service standard, with potential costs savings.
37	Service Review: 3 weekly household waste collection	Will be a major change to how collection has been undertaken within the Borough	With budget constraints, service levels need to be reviewed	CS/JH	Potential for cost savings, however need to balance against public perception.
38	Service Review: 4 weekly household waste collection	Will be a major change to how collection has been undertaken within the Borough	With budget constraints, service levels need to be reviewed	CS/JH	Potential for cost savings, however need to balance against public perception.

URN:

Subject: Draft Coastal Adaptation Supplementary Planning Document Consultation

Report to: Policy & Resources Committee – 6 December 2022

Report by: Kim Balls – Principal Strategic Planner

SUBJECT MATTER

Public consultation on the draft Coastal Adaptation Supplementary Planning Document

RECOMMENDATION

That the Policy & Resources Committee:

- 1. endorses the Draft Coastal Adaptation SPD, included as Appendix 1 in this report for consultation**
- 2. delegates authority to the Director of Planning & Growth to make minor amendments to the consultation documents prior to consultation.**

1. Background

- 1.1. The Norfolk and Suffolk coast is a dynamic coastline which poses numerous challenges in its management from protection to adaptation. The risk of coastal flooding and vulnerability to erosion along the coast does not respect local planning authority boundaries, and therefore coastal change needs to be considered across a wide geography. There are significant potential benefits to joint working across administrative and professional disciplines in addresses the issues of coastal planning.
- 1.2. In 2016 Coastal Partnership East (CPE), a partnership of Great Yarmouth Borough Council, North Norfolk District Council and East Suffolk Council was established to help address those challenges. In 2018 the CPE authorities, along with the addition of the Broads Authority and Kings Lynn and West Norfolk signed up to a '[Statement of Common Ground on Coastal Zone Planning](#)'. This statement was approved by this Council's Environment Committee in July 2018 and sought to establish a set of principles to inform local planning policies, to ensure a consistent and aligned approach to planning for coastal management.
- 1.3. As a result, all the signatory local authorities have prepared or are preparing Local Plans with similar policies on managing the coast. In the case of Great Yarmouth, these are contained in the Local Plan Part 2 which was adopted in December 2021. These policies cover what developments are appropriate within areas at risk of coastal change, how we will determine applications for coastal defences and how we will facilitate roll-back and relocation of development at risk from coastal change.

- 1.4. A Supplementary Planning Document (SPD) is a document which adds further details to the policies in a Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as in this case on coastal adaptation.
- 1.5. Given the agreement in the Statement of Common Ground and the partnership approach through CPE it has been considered valuable to prepare a joint SPD for the CPE area. In doing so, an SPD would provide guidance on the aligned coastal policies in the respective Local Plans, include best practice, case studies and guidance on how policies can be interpreted and implemented.
- 1.6. As such a working group made up of planners from the relevant authorities, the Broads Authority (who cover a small area of coast near Horsey) together with officers from Coastal Partnership East was created in early 2020 to pool resources, share best practice and prepare the SPD.
- 1.7. A draft Coastal Adaptation Supplementary Planning Document has now been prepared and is appended to this report (Appendix 1).

2. Preparation of Coastal Adaptation Supplementary Planning Document

- 2.1. The Town and Country Planning (Local Planning) Regulations 2012 requires two stages of consultation during the preparation of a Supplementary Planning Document. Firstly, consultation is required during the initial preparation of the document to inform a draft Supplementary Planning Document. Secondly, once a draft Supplementary Planning Document has been prepared, this must then be subject to further consultation prior to adoption.
- 2.2. A decision to consult on the initial content and scope of the draft SPD was agreed by the Council's Policy and Resources Committee in July 2020 and was subsequently undertaken across the CPE area between September and October 2020. This consultation engaged statutory and non-statutory consultees and invited local coastal groups, such as the Hemsby and Winterton Liaison Group, to participate.
- 2.3. A Consultation Statement has been appended to this report (Appendix 2) detailing the responses submitted during the initial consultation, how the issues raised have been taken into consideration to prepare the full draft SPD.
- 2.4. A Strategic Environmental Assessment Screening Opinion has been undertaken on the draft SPD (Appendix 3), concluding that a full Strategic Environmental Assessment would not be necessary. A Habitats Regulations Assessment Screening Statement (Appendix 4) has also been undertaken and concludes that the draft SPD will not lead to likely significant effects on protected Habitats sites. These conclusions have been considered and agreed with the relevant statutory bodies (Environment Agency, Historic England, and Natural England).
- 2.5. An Equality Impact Assessment Screening Opinion (Appendix 5) has been undertaken and concludes that the draft SPD would have no differential negative impacts upon those with protected characteristics.
- 2.6. This report, including all of the appended consultation documents was presented to the Council's Local Plan Working Party (LPWP) on 16th November 2022. At this meeting, Members agreed to endorse the Draft Coastal Adaptation SPD to the Policy & Resources Committee.

3. Further Public Consultation

- 3.1. The draft Coastal Adaptation Supplement Planning Document is ready for further public consultation. This is anticipated to commence in January 2023 and will last for a period of 6 weeks and will engage statutory and non-statutory consultees on each of the partnership authority's consultation databases. East Suffolk Council have agreed to run the consultation on behalf of all authorities involved
- 3.2. The scale of the draft SPD (which covers the coast from Holkham in North Norfolk to Felixstowe in East Suffolk) requires consideration by several members through a few committees. Therefore, it is recommended that responsibility to agree any minor modifications to the draft SPD arising from one or more committee meetings (including the Council's Policy & Resources Committee) is delegated to the Director of Planning and Growth.

4. Next Steps

- 4.1. Following public consultation, revisions may be made to the SPD to consider any comments received. The final SPD will then be brought back to the Policy & Resources for adoption.

5. Financial Implications

- 5.1. Preparation of the Coastal Adaptation SPD has been resourced through the Strategic Planning Budget, and there remains sufficient resource to progress it through to its adoption. The joint production of the document has saved, and will continue to save, on officer resources.

6. Legal and Risk Implications

- 6.1. The risks in producing the SPD are limited. The SPD is being prepared in accordance with the Planning and Compulsory Purchase Act 2002 and the Town and Country Planning (Local Planning) Regulations 2012. Consultation is a necessity in the preparation of a Supplementary Planning Document, and if not done correctly could lead to future scope for challenge.

7. Recommendations

- 7.1. That the Policy & Resources Committee:
 1. endorses the Draft Coastal Adaptation SPD, included as Appendix 1 in this report for consultation;
 2. delegates authority to the Director of Planning & Growth to make minor amendments to the consultation documents prior to consultation.

8. Appendices

- Appendix 1 – Draft Coastal Adaptation Supplementary Planning Document
- Appendix 2 – Consultation Statement
- Appendix 3 – Strategic Environmental Assessment Screening Opinion
- Appendix 4 – Habitats Regulations Assessment Screening Statement
- Appendix 5 – Equality Impact Assessment Screening Opinion

Areas of consideration: e.g., does this report raise any of the following issues and if so, how have these been considered/mitigated against?

Area for consideration	Comment
Monitoring Officer Consultation:	Through ELT – 23 November 2022
Section 151 Officer Consultation:	Through ELT – 23 November 2022
Existing Council Policies:	Local Plan Part 1: Core Strategy; Local Plan Part 2.
Financial Implications (including VAT and tax):	See Section 4
Legal Implications (including human rights):	See Section 5
Risk Implications:	See Section 5
Equality Issues/EQIA assessment:	EqIA undertaken – See Appendix 5
Crime & Disorder:	n/a
Every Child Matters:	n/a

Draft Coastal Adaptation Supplementary Planning Document

October 2022

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INTRODUCTION

- 1.1 A partnership of East Suffolk Council (ESC), Great Yarmouth Borough Council (GYBC), North Norfolk District Council (NNDC), The Broads Authority (The Broads), and the shared Coastal Partnership East team (CPE)¹ has prepared the draft Coastal Adaptation Supplementary Planning Document (SPD), which has been based on consultation responses received to the initial consultation (held between 4 September 2022 and 16 October 2020). The purpose of this SPD is to provide guidance on aligned policy approaches along the coast (see figure 1) and to take a holistic (whole coast) approach, which follows from the Statement of Common Ground on Coastal Zone Planning (Appendix 1) agreed between the partnership authorities in September 2018 and which remains relevant. In doing so, this SPD will ensure planning guidance is up to date, aid the interpretation and delivery of planning policy, and provide case study examples of coastal adaptation best practice.
- 1.2 The objectives of producing the SPD are:
- Ensuring Coastal Communities continue to prosper and can adapt to coastal change; and
 - To provide detailed guidance to developers, landowners, development management teams, and elected members on the interpretation of policies with a whole coast approach.
- 1.3 The SPD cannot create new or amend existing planning policies nor can it prescribe that particular areas of land be developed for particular uses; this is the role of the wider development plans of each local planning authority (LPA).
- 1.4 The purpose of the SPD therefore is to provide guidance on the correct interpretation of planning policy and aid the implementation of relevant policies. When adopted the SPD will be a material consideration in determining planning applications.
- 1.5 While we hope this document provides useful guidance for a range of scenarios it will not be possible to address the complexity of issues in every scenario. As with all coastal related development projects, early engagement with the LPA and CPE will always be encouraged to maximise opportunities and manage risks to life and property in a timely manner.

¹ Coastal Partnership East is the shared coastal management team of North Norfolk District Council, Great Yarmouth Borough Council and East Suffolk Council



Stormy skies over Waxham showing sea defences

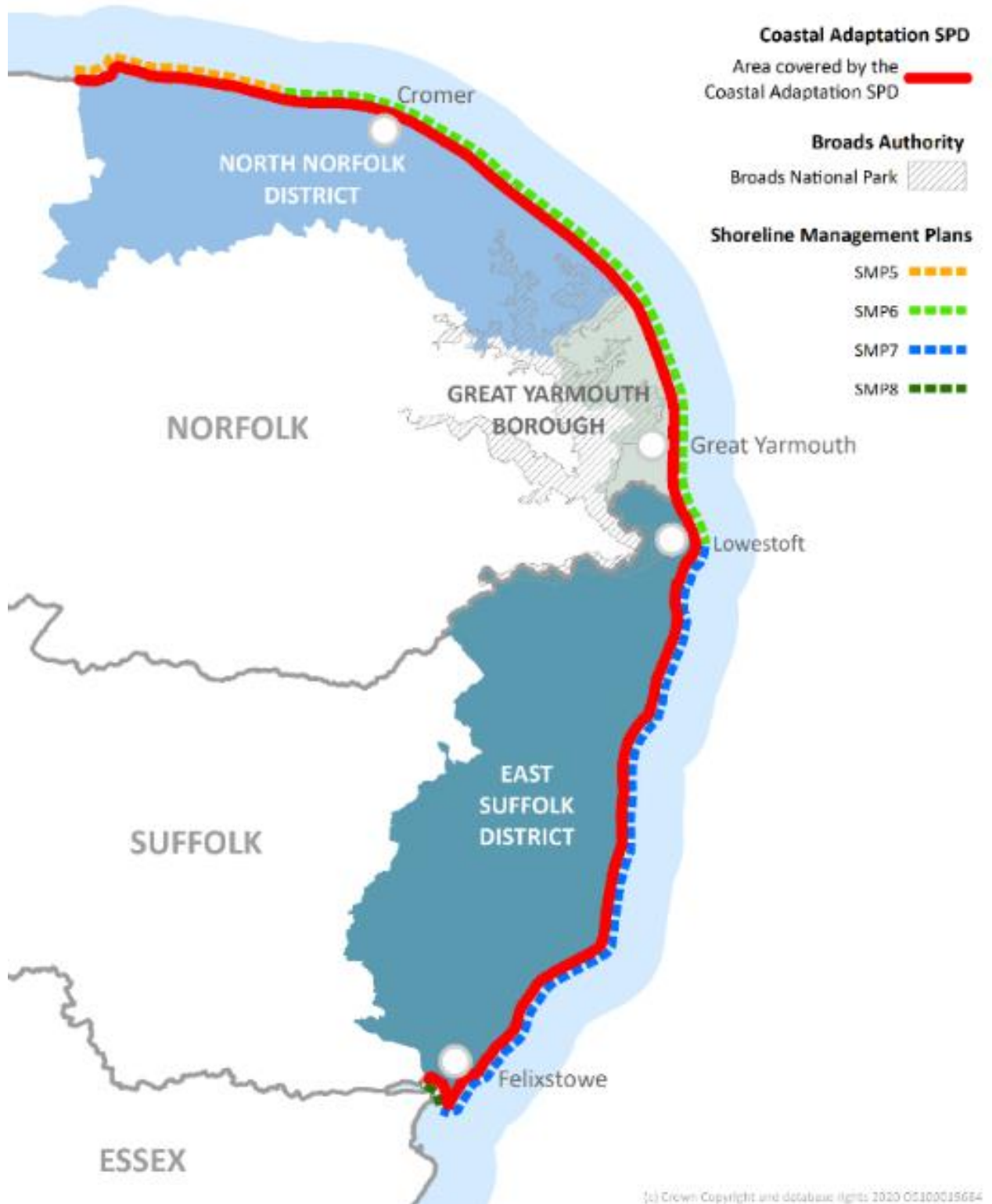


Figure 1 - The area to which the SPD applies

2 CONTEXT: HOMES, BUSINESSES, COMMUNITIES, AND ENVIRONMENT AFFECTED BY COASTAL CHANGE

1.6 Before providing guidance relating to the implementation of coastal planning policies of the Partnership's Local Plans, it is important to set out the context within which the coastal planning policies operate. This context chapter seeks to answer the following questions

- What are the coastal processes and geology affecting the coast?
- What are the economic, social, and environmental benefits enjoyed along the coast and how are they affected by coastal change?
- How is and will climate change affect the coast?

What are the coastal processes and geology affecting the coast?

- 1.7 The geology of this stretch of the Norfolk and Suffolk coast can be traced back to the Cretaceous Period, with the oldest chalk dating to approximately 140 million years old. The bedrock is today covered by glacial sands, silts, clays and gravels deposited and shaped through the action of ice and meltwater over the past 2 million years. Over the last 10,000 years following the last ice age, the sea level has risen and the East Anglian coast, as is recognisable today, was formed.
- 1.8 The coast is prone to erosion through natural processes such as storms, surges and high levels of ground water, resulting over thousands of years in continued changes to the coast. While these changes predominantly lead to erosion of the coast, there are areas where accretion (growth of land at the coast) of the coast occurs, which can present a variety of challenges and opportunities for coastal communities, and the environment. Coastal processes affect the coast in a variety of ways and detailed geomorphology and coastal processes for specific sections of the coast are set out in our Shoreline Management Plans² (SMP).

What are the economic, social, and environmental benefits enjoyed along the coast and how are they affected by coastal processes?

- 1.9 The rich and diverse Norfolk and Suffolk coast, offers a variety of opportunities, whether they benefit the environment, communities, and/or businesses.

² SMP5 Hunstanton to Kelling Hard, SMP6 Kelling Hard to Lowestoft, SMP7 Lowestoft to Felixstowe, and SMP8 Essex and South Suffolk.

- 1.10 Large areas of the coast and inland coastal zone are covered by natural and historic environment designations. These designations seek to maintain areas, buildings and structures for the significant contribution they make in respect of natural beauty, heritage, geodiversity, special habitats, and biodiversity, some of which are of national and international importance.
- 1.11 The historic, cultural, and natural qualities of the coast attract many visitors every year and are an essential part of the successful local and regional economy. Other essential elements of the economy include agriculture, major ports and smaller harbours that sustain our maritime activities (from local fishing to global trade) and the diverse and growing energy sector, as well as the infrastructure that knits everything together. These benefits taken together make for an attractive place for leisure and recreation, to do business, as well as to live.



Cromer Pier with theatre, shops and lifeboat station in rough seas

- 1.12 Whilst erosion can cause risk to people and property, it is also an important natural coastal process. Without erosion, vital sediment would not enter the coastal system from the cliffs, needed to form beaches and other landforms which we value for multiple reasons, including recreation and natural coast protection. Sediment generally moves from north to south along the shoreline and near shore, although this can vary locally. Beaches are an important aspect of coastal protection and a beach with high levels of materials is essential for many of the coastal management structures whilst also providing natural protection to cliffs. Slowing the movement of sediment through the use of coastal structures or other interventions (e.g. beach replenishment) can help keep or restore beaches. However, coastal protection can also deprive downdrift sections of the coast of sediment, which leads to increased wave impact on coastal structures and cliff erosion. Not only do the coastal processes affect the benefits we take from the coast, but the ways in which we manage the coast also have a fundamental impact on coastal processes.
- 1.13 It is clear that many of the benefits we enjoy along our coast are at risk from coastal change, and that the effective management of our coast and adaptation to the effects of coastal change are of fundamental importance to the continued sustainable enjoyment of our coast.

How is and will climate change affect the coast?

- 1.14 The risks from climate change enhanced coastal erosion are recognised in the UK Climate Change Risk Assessment (2022)³, the Government's National Flood and Coastal Erosion Risk Management Policy Statement (2020)⁴, the Environment Agency's National Flood and Coastal Erosion Risk Management Strategy (2020)⁵, and the Committee on Climate Change's 'Managing the Coast in a Changing Climate' report (2018)⁶. These publications cite evidence of, and recent projections for a changing climate, and coastal erosion implications.
- 1.15 Trends indicate accelerating sea-level rise, milder wetter winters, drier hotter summers, and an increase in extreme weather events such as storm surges. The effects of climate change are likely to accelerate rates of coastal erosion. There are particular implications for cliff instability as slips and slumps can be caused by groundwater changes due to periods of extreme winter precipitation (and periods of drying). The resilience of risk management infrastructure, to for example degradation through storm surge damage, is also a key impact.
- 1.16 Coastal change is complex and there are many additional drivers and uncertainties in the system. These include diverse geology and the interaction of risk management infrastructure with coastal processes (i.e. interruptions in the natural process of sediment supply and movement along the coast). Alongside uncertainties regarding the rates of climate change, predicting coastal change will become more challenging.



Stormy sea at Gorleston Harbour looking towards Great Yarmouth

³ <https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2022>

⁴ <https://www.gov.uk/government/publications/flood-and-coastal-erosion-risk-management-policy-statement>

⁵ <https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2>

⁶ <https://www.theccc.org.uk/publication/managing-the-coast-in-a-changing-climate/>

- 1.17 Taken together these effects will continue to increase the pressure on coastal communities, natural and historic environments, businesses and infrastructure in the following ways:
- Increased risk to life.
 - Increased risk to property.
 - Increased pressures on coastal risk management measures.
 - Increased risks to protected habitats.
 - Increased risk of loss of infrastructure.
 - Increased risk of a reduction in economic activity.
 - Increased risk of loss of heritage assets.
 - Increased risk of loss of farmland.
 - Increased costs of emergency response.
 - Increased repair and maintenance of coastal risk management measures.
 - Increased risk of saline intrusion, particularly in agricultural land.
- 1.18 Understanding these complex coastal processes, the socio-economic and environmental benefits that are provided by the coast, and the likely impacts of climate change are integral to devising the most appropriate strategies for the continued long-term management of our coast. An outline of available coastal management measures and policies is set out in the next chapter.

2 COASTAL MANAGEMENT MEASURES AND POLICIES

Introduction

- 2.1 The fundamental principle of risk management and planning policy in coastal areas is that of Integrated Coastal Zone Management (ICZM), which is a process that requires the adoption of a joined-up and participative approach towards the planning and management of the many different elements in coastal areas (land and marine). The partnership authorities have and continue to implement an ICZM approach, as evidenced by the Norfolk and Suffolk Coastal Authorities Statement of Common Ground for Coastal Zone Planning. As coastal erosion risk management authorities, East Suffolk Council, Great Yarmouth Borough Council, and North Norfolk District Council, are signatories to the Coastal Concordat for England⁷.
- 2.2 This chapter seeks to provide an overview of coastal management and planning policy at the national, local and neighbourhood scales, whilst recognising that the complexity and scale of involvement from a number of organisations and individuals cannot be neatly captured in one chapter. For this reason,

⁷ <https://www.gov.uk/government/publications/a-coastal-concordat-for-england>

Appendix 2 (Organisation Roles & Responsibilities) seeks to support this chapter and sets out the various roles, permissive powers and responsibilities of the key organisations that engage in coastal management and planning.

National Policy and Guidance

- 2.3 The Government's Flood and Coastal Erosion Risk Management Policy Statement⁸ sets out the government's long-term ambition to create a nation more resilient to future flood and coastal erosion risk, reducing the risk of harm to people, the environment and the economy. The Environment Agency's Flood and Coastal Erosion Risk Management Strategy⁹ provides a framework for guiding the operational activities and decision making of practitioners supporting the direction set by government policy. The key objectives of both the Government's Policy Statement and the Environment Agency's Strategy are to ensure existing and future places and infrastructure are resilient to coastal change and that everyone understands the risks of coastal change, their responsibilities and how to take action. Clearly set out within both documents is the importance of collaborative working to ensure the key policy objectives are met.
- 2.4 The Environment Agency (the Agency) is a non-departmental public body with a wide range of responsibilities, which includes taking a strategic overview of the management of coastal erosion. This strategic overview role allows the Agency to provide leadership for the management of coastal change including where other risk management authorities have operational responsibilities, thereby helping to facilitate a joined-up approach to tackling coastal erosion risk in a manner consistent with the principles of ICZM.
- 2.5 The ICZM approach is carried into the National Planning Policy Framework (NPPF)¹⁰, which sets the Government's planning policies at the national level. Local Plans, which set the planning policies for LPA areas, must be consistent with the policies set out in the NPPF to be deemed 'sound' and therefore capable of being adopted and used to determine planning applications across LPA areas. Thus, Local Plan policies must be consistent with the Government's ICZM approach.
- 2.6 The NPPF also sets out that Local Plans should manage the risks from development in areas at risk of coastal change. To do this Coastal Change Management Areas (CCMA) should be identified within Local Plans and inappropriate development within CCMA should be avoided. A CCMA is defined as an area identified in plans as likely to be affected by physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion.
- 2.7 The Planning Practice Guidance for Flood Risk and Coastal Change¹¹ provides guidance as to how NPPF policy can be implemented through the preparation of land use plans (e.g. Local Plans and Neighbourhood Plans) and the determination of planning applications.

⁸ <https://www.gov.uk/government/publications/flood-and-coastal-erosion-risk-management-policy-statement>

⁹ <https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2>

¹⁰ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/100575/9/NPPF_July_2021.pdf

¹¹ <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

- 2.8 The above documents are focussed on the terrestrial planning system, in other words land based as opposed to the marine based planning system. The boundary between the two systems is between the mean spring high and low water marks, creating an overlapping area where both the terrestrial and marine planning systems operate. Marine planning¹² is governed by the Government's UK Marine Policy Statement (MPS)¹³ and the Marine Management Organisation's (MMO) Marine Plans. The MPS provides the national framework for the preparation of Marine Plans and decision making affecting the marine environment, while Marine Plans provide detailed policy and spatial guidance for an area and help ensure that decisions within a plan area contribute to delivery of UK, national and any area specific policy objectives. The MPS and Marine Plans are managed in an integrated and holistic way, in line with the principles of ICZM. The Marine Plans relevant to the SPD area are:
- East Inshore and Offshore Marine Plans (2014)¹⁴
 - South East Inshore Marine Plan (2021)¹⁵
- 2.9 A marine licence may be required for any relevant developments¹⁶ which may impact the marine environment, such as coastal risk management structures.
- 2.10 The coast is also home to a large number of natural and historic environment designations, from large scale Special Areas of Conservation to small listed buildings, and across the terrestrial and marine planning realms. These designations are often susceptible to coastal change which can result in loss of part of all of these assets, or conversely, can be an integral part of their designation as is the case with geologically important cliff features. Natural England and Historic England have important statutory roles in supporting the continued conservation of environmental designations and heritage assets, respectively.

Local Policy

- 2.11 At the local level there are a range of documents that provide coastal planning and risk management policy and guidance. Local Plans, Shoreline Management Plans, and Neighbourhood Plans are foremost among these. Each of these documents are prepared in order to meet specific, often competing, objectives. Objectives of SMP policies include:
- To avoid the loss of life,
 - To increase resilience to coastal change, helping to protect households and the local economy,
 - To contribute to a sustainable and integrated approach to land use planning,
 - To support adaptation by the local coastal communities,
 - To avoid damage to and enhance the natural and historic environments,
 - To maintain and improve landscape designations and features, and

¹² More information about UK marine planning is available here: [Explore marine plans - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/uk-marine-policy-statement)

¹³ <https://www.gov.uk/government/publications/uk-marine-policy-statement>

¹⁴ [East Marine Plans - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/uk-marine-policy-statement)

¹⁵ [The South East Marine Plan Documents - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/uk-marine-policy-statement)

¹⁶ Information concerning the need for a marine license for development is available here: [Explore marine plans - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/uk-marine-policy-statement)

- To reduce reliance on coastal risk management structures.

2.12 Objectives of Local Plan and Neighbourhood Plan policies cover the following:

- To increase our resilience to coastal change, helping to protect households and the local economy,
- To support healthy, safe, cohesive and active communities through improving health, wellbeing and education opportunities for all,
- To achieve diverse and prosperous economic growth,
- To enhance the vitality and viability of town centres and villages,
- To protect and enhance tourism and cultural facilities,
- To enhance and protect the natural, built and historic environment and provide accessible green infrastructure and public open spaces,
- To achieve high quality design,
- To mitigate human impact on the environment and reduce contributions to climate change,
- To deliver new homes, and
- To improve the quality and provision of all types of infrastructure.

2.13 Coastal processes¹⁷ make for a dynamic coast, and decisions made at one part of the coast can influence coastal processes at other parts of the coast. It is therefore not always possible or desirable to meet all of these objectives at every stretch of the coast and a balanced approach must be taken to ensure the effective and sustainable management of the coast for all, both now and in the future.



Sea defences/rock berm at Happisburgh with cliff erosion shown

2.14 Shoreline Management Plans (SMP) provide coastal authorities with an opportunity to assess the risks associated with coastal processes and long-term implications for managing the coast. The eastern half

¹⁷ Natural processes driven by geology, tides, weather and climate change that shape the coast.

of SMP5 (Hunstanton to Kelling Hard)¹⁸, SMP6 (Kelling Hard to Lowestoft Ness)¹⁹, SMP7 (Lowestoft Ness to Felixstowe Landguard Point)²⁰, and the northern most point of SMP8 (Landguard Point to Two Tree Island)²¹ cover the coastal area to which this SPD relates. As key sources of evidence SMPs are integral to the formulation of Local Plan policy in respect of the coast, in particular the identification of the CCMA.

- 2.15 Local Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed and sustainable places. Local Plans are at the heart of the planning system with a requirement in law for their planning policies to be accorded with by planning applications unless material considerations indicate otherwise. For coastal planning, the overarching objective for Local Plans is the same as that of the NPPF, to avoid inappropriate development in vulnerable coastal areas and to facilitate relocation and replacement of assets at risk of loss.



Eroded cliffs at East Runton

- 2.16 The partnership authorities each have their own Local Plans with their own coastal planning policies. The partnership authorities' adopted Local Plans are:

- East Suffolk Council²² Suffolk Coastal Local Plan (adopted 2020)²³

¹⁸ [EACG \(East Anglian Coastal Group\) - SMP 5](#)

¹⁹ [EACG \(East Anglian Coastal Group\) - SMP 6](#)

²⁰ [Shoreline Management Plan 7 \(suffolksmp2.org.uk\)](#)

²¹ [EACG \(East Anglian Coastal Group\) - SMP 8](#)

²² Suffolk Coastal District Council and Waveney District Council merged on 1 April 2019 to become East Suffolk Council. Plan making was underway prior to the merge which is why two local plans (Suffolk Coastal Local Plan covering the former Suffolk Coastal area and Waveney Local Plan covering the former Waveney area) cover the East Suffolk Council area.

²³ <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/>

- East Suffolk Council Waveney Local Plan (adopted 2019)²⁴
- Great Yarmouth Local Plan Part 1 (adopted 2015)²⁵
- Great Yarmouth Local Plan Part 2 (adopted 2021)²⁶
- North Norfolk Core Strategy (adopted 2008)²⁷
- The Broads Local Plan (adopted 2019)²⁸

- 2.17 North Norfolk District Council is at an advanced stage with their emerging Local Plan, which when adopted will supersede the above North Norfolk Core Strategy. The draft SPD is intended to also provide guidance in relation to the emerging North Norfolk District Council Local Plan²⁹, which has reached an advanced stage where weight can be given in accordance with paragraph 48 of the NPPF.
- 2.18 Neighbourhood Plans can be most easily understood as smaller scale Local Plans, most frequently undertaken by parish councils and applying to their designated areas. Neighbourhood Plans must be in general conformity with the strategic policies set out in the relevant Local Plan/s and must have regard to the NPPF. The coastal management policies within our Local Plans are strategic policies, and therefore the preparation of Neighbourhood Plans, where they seek to address coastal planning matters, should not be in isolation but act to further support our ICZM approach.

Local Plan policies

- 2.19 This section highlights the key Local Plan policies addressing coastal planning matters within the partnership authorities' Local Plans.
- 2.20 The following policies identify the CCMA and the circumstances whereby development may be acceptable within the CCMA:
- ESC Suffolk Coastal Local Plan policy SCLP9.3 (Coastal Change Management Area)
 - ESC Waveney Local Plan policy WLP8.25 (Coastal Change Management Area)
 - GYBC Local Plan Part 2 policy GSP4 (New Development in Coastal Change Management Areas)
 - NNDC Core Strategy policy EN11 (Coastal Erosion), the CCMA is referred to as the Coastal Erosion Constraint Area. Emerging NNDC Local Plan policy CC5 (Coastal Change Management) is also relevant as the emerging plan has reached an advanced stage.
- 2.21 While the Broads Local Plan does not identify a CCMA, policy SSCOAST (The Coast) provides a framework whereby operational development in the coastal zone, as identified on the Broads Local Plan policies map, will generally not be permitted unless in exceptional circumstances.

²⁴ <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/>

²⁵ <https://www.great-yarmouth.gov.uk/article/2489/Current-Local-Plan>

²⁶ <https://www.great-yarmouth.gov.uk/article/2489/Current-Local-Plan>

²⁷ <https://www.north-norfolk.gov.uk/tasks/planning-policy/core-strategy/>

²⁸ <https://www.broads-authority.gov.uk/planning/planning-policies/development>

²⁹ <https://www.north-norfolk.gov.uk/tasks/planning-policy/local-plan-new/>

- 2.22 The above policies, except Broads Local Plan policy SSCOAST (The Coast), also require Coastal Erosion Vulnerability Assessments (CEVA) to support relevant planning applications. NNDC Core Strategy policy EN11 (Coastal Erosion) does not refer to CEVA by name but does require evidence of the vulnerability of proposed development to coastal change to support planning applications.
- 2.23 The following policies support rollback and relocation of development at risk from coastal change:
- ESC Suffolk Coastal Local Plan policy SCLP9.4 (Coastal Change Rollback or Relocation)
 - ESC Waveney Local Plan policy WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion)
 - GYBC Local Plan Part 1 policy CS13 (Protecting Areas at Risk of Flooding or Coastal Change)
 - GYBC Local Plan Part 2 policy E2 (Relocation from Coastal Change Management Areas)
 - NNDC Core Strategy policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk). Emerging NNDC Local Plan policy CC6 (Coastal Change Adaptation) is also relevant as the emerging plan has reached an advanced stage.
- 2.24 The Broads Local Plan does not contain a policy regarding rollback and relocation of development at risk from coastal change as there is no development at risk from coastal change along The Broads coast. However, the effects of coastal change on the estuary in the form of permanent inundation is acknowledged and consideration must be given to this risk irrespective of the Local Plan policy context.

3 DEVELOPMENT IN THE COASTAL CHANGE MANAGEMENT AREA

Introduction

- 3.1 This chapter provides guidance regarding the circumstances in which development may be appropriate within the Coastal Change Management Area (CCMA) across the relevant local authorities. All coastal development proposals should take account of the timeframe of erosion risk across the CCMA. The primary purpose of the CCMA is to identify land that is likely to be vulnerable to coastal change now and in the future (across a 100 year timeframe). Incorporating the CCMA into Local Plans supports this purpose with the objective of avoiding inappropriate and guiding appropriate development within the CCMA.
- 3.2 The collective Shoreline Management Plans (SMPs) for the coast covered by this SPD provide large-scale assessment of the risks associated with coastal erosion and flooding. The SMPs set out the coastal management policy for the short (up to 2025), medium (up to 2055) and long (up to 2105) term erosion risk areas. This policy framework addresses risks to people and the built and natural environment with the intention of informing policy and planning decisions in a sustainable manner. As such, the emerging and adopted Local Plans of the Local Authorities have used the relevant SMPs as the evidence base to form the CCMA within their Local Plans and mapped these areas on their respective Policies Maps³⁰. For information, North Norfolk District Council's existing Core Strategy Policies Map refers to a Coastal Erosion Constraint Area, which is also informed by the relevant SMPs.
- 3.3 The three erosion risk areas that make up the CCMA, the geographical extent of each risk area and the description of the nature of the risk in each area are detailed in each SMP. This information will provide a valuable insight for those seeking to understand the development options for a given area of land.
- 3.4 While the SMP evidence supporting the erosion risk areas, and therefore the CCMA, is robust, it is also important to note the following:
- The rate of coastal erosion (cliff recession rate) will rarely be steady or predictable. The SMP erosion risk areas show the likely overall extent of erosion for each epoch, but for example, it would be wrong to infer that half way through a particular epoch the erosion will extend to half of the risk area.

³⁰ Suffolk Coastal Local Plan and Waveney Local Plan policies map: <https://eastsuffolk.maps.arcgis.com/apps/webappviewer/index.html?id=f6a98a5e2ddc4c209729cd8a180645b4>
Great Yarmouth Local Plan policies map: <http://gybc.maps.arcgis.com/apps/webappviewer/index.html?id=ad21a10d70144a44949037739fe5acfd>
North Norfolk Core Strategy policies map: <https://www.north-norfolk.gov.uk/tasks/planning-policy/proposals-map/>
The Broads Local Plan policies map: <https://www.broads-authority.gov.uk/planning/planning-policies/development/policies-maps-final-adopted-versions>

- In order to effectively manage the inherent unpredictability of coastal change, buffer areas have been added to the evidenced erosion risk areas. For example, some of the participating local authorities identify a 30 metre risk zone landward of areas identified as a CCMA in order to ensure that developments take account of the coastal erosion risk in the general vicinity. Added to this, the Council and some implements a 30 metre risk zone landward of areas where the intent of management is to Hold the Line (HTL) and where, consequently, no CCMA has been identified.
- The risk of coastal erosion, relates not only to the action of the sea on the cliff toe, but also to the composition of the cliffs, where a high water content can also contribute to instability, leaving them susceptible to slumping and landslides, irrespective of the nature of risk management structures.
- Erosion risk can also occur outside the CCMA, for example, from wave overtopping, which can result in cliff erosion and risk to life and property, where risk management structures are present.
- The erosion risk areas are likely to be updated during the lifetime of this document and consequently, the CCMA will shift to take account of the revised SMP data. Any updating of the CCMA will need to be flexible enough to account for instances where new data reflects a greater or lesser risk than previously documented.

What types of development can be appropriate in a CCMA

3.5 Each development proposal will have a different level of investment and a different intensity and degree of use, meaning the potential increase of risk to property or life will vary. When referring to the development matrix in this section, other considerations, such as the scale of development will be of particular relevance when considering the degree of significance in terms of risk and consequently its appropriateness. In addition, it is important to highlight that all proposals will be considered against all relevant Local Plan policies of the determining Local Planning Authority and all other material planning considerations.

3.6 What the National Planning Practice Guidance (PPG) says:

Paragraph: 073 (Reference ID: 7-073-20220825) of the PPG states that essential infrastructure and Ministry of Defence (MOD) installations requiring a coastal location can be appropriate permanent development within a CCMA provided there are clear plans to manage the impacts of coastal change on it and where it will not have an adverse impact on rates of coastal change elsewhere.

3.7 The types of development this can include are:

- essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk;
- Essential existing or proposed utility infrastructure which is or has to be located in a risk area for operational reasons, including electricity generating power stations, grid and primary substations and water treatment works that need to remain operational in times of flood;
- Wind turbines. (*Picture of wind turbines*)

- 3.8 The PPG continues that for other development the following criteria can be used as a basis for planning decisions on what may be appropriate:
- **Within Short-term risk areas (20 year time horizon) of the CCMA:** only a limited range of types of development directly linked to the coastal strip, such as beach huts, cafes/tea rooms, car parks and sites used for holiday or short-let caravans and camping may be appropriate. All would require time-limited planning permissions.
 - **Within the medium (20 to 50-year) and long-term (up to 100-year) risk areas of the CCMA:** a wider range of time-limited development, such as hotels, shops, office or leisure activities requiring a coastal location and providing substantial economic and social benefits to the community, may be appropriate.
 - Existing buildings, infrastructure and land-use subject to the relevant planning permission could adapt and diversify to changing circumstances, where it reduces vulnerability, increases resilience and raises funds to facilitate subsequent relocation.
 - Permanent new residential development (including through change of use) will not be appropriate within a CCMA.
- 3.9 Paragraph: 074 Reference ID: 7-074-20220825 provides guidance as to when a Coastal Erosion Vulnerability Assessment (CEVA) will be required within a CCMA.
- 3.10 As set out above, the NPPF and PPG provide a clear framework for the types of development that are considered appropriate within the CCMA. With the exception of the Broads Authority (due to their small stretch of coast), all of the coastal Local Planning Authorities have identified CCMA's in their adopted and emerging Local Plans and mapped these on associated Policies Maps, where the respective coastal planning policies set out the principle of development within the CCMA's. An applicant should refer to the relevant Policies Map in order to ascertain in which, if any, of the CCMA risk areas the proposed site is located and also refer to the relevant Local Plan coastal policies to understand how a planning application would be assessed by the particular Local Authority.
- 3.11 There are likely to be proposals that do not meet the national policy and guidance or local planning policies, but that could provide new and innovative opportunities to manage the transition in the coastal zone and deliver coastal, environmental and/or social benefits. This is discussed in more detail in the following chapters, but it is imperative that any such proposals be discussed at the earliest opportunity with the relevant local planning authority and Coastal Partnership East.
- 3.12 The following paragraphs aim to group different types of development by the nature of their vulnerability and impact with regards to coastal change. As well as the type of development proposed, its scale, extent and its permanence amongst other matters, will clearly be of relevance when considering the degree of planning significance and therefore, the potential appropriateness of a development proposal.
- 3.13 Based on the relevant policies in the respective Local Plans, NPPF and PPG, Table 1 provides a high level summary of the suitability of each development type listed in relation to the three SMP risk areas (short, medium and long-term) that make up the CCMA.
- 3.14 It will be essential that an applicant checks the relevant SMP to ascertain what risk area a potential development site is located in. It should be noted that if a site straddles the short and medium/ long

term risk areas, the types of development that may be considered appropriate will be different. For example, proposals to reconfigure a holiday park could seek to locate camping vehicles, tents and touring caravans on land within the short term risk area and modular type holiday accommodation, such as static mobile homes and lodges, within the medium to long term risk areas.

Aerial view of Corton and showing cliffs, groynes and caravan parks



Table 1 Development Matrix summarising the suitability of each development type in relation to the three SMP epochs (short, medium and long-term) that make up CCMA.

Development Type	Short term (up to 2025)	Medium term (2025 – 2055)	Long term (2055 - 2105)	Notes
New permanent residential development, including replacement dwellings or change of use to a permanent dwelling	No	No	No	Not permitted within the CCMA. See relevant section for more information.
New permanent non-residential development	No	Possibly	Possibly	Assessment will take account of CEVA information and planning conditions are likely to be added in order to maintain the value to the community in perpetuity (for the lifetime of the development). See relevant section for more information.
Temporary and time limited development	Possibly	Yes	Yes	Assessment will take account of CEVA information and time limited conditions will be added to a planning consent. See relevant section for more information.
Open Land Uses (i.e. no buildings)	Yes	Yes	Yes	Assessment will take account of CEVA information and time limited conditions will be added to a planning consent. See relevant section for more information.
Changes of use (non-residential)	Possibly	Possibly	Possibly	Assessment will take account of CEVA information and time limited conditions will be added to a planning consent. See relevant section for more information.
Extensions (including householder development)	Possibly	Yes	Yes	Assessment will take account of CEVA information and in particular, the level of risk to life and property. See relevant section for more information.
Intensification of Use (non-residential)	No	Possibly	Possibly	Assessment will take account of CEVA information and type of use.

				See relevant section for more information.
Redevelopment or reconfiguration of existing sites (non-residential)	No	Possibly	Possibly	Assessment will take account of CEVA information and time limited conditions will be added to a planning consent. See relevant section for more information.
Replacement of Development Affected by Coastal Change (non-residential)	No	Possibly	Possibly	Assessment will take account of CEVA information and type of use. Time limited conditions will be added to a planning consent. See relevant section for more information.
Essential Infrastructure and Community Uses	Possibly	Possibly	Possibly	Assessment will take account of CEVA information. See relevant section for more information.

Yes	Development will be acceptable, but a planning consent is likely to be subject to appropriate conditions/legal agreement
No	Development will not be acceptable under any circumstances
Possibly	Development may be acceptable subject to the findings of a CEVA. A planning consent is likely to be subject to appropriate conditions/legal agreement

New permanent residential development

- 3.15 Each of the participating Local Planning Authorities, other than the Broads Authority, have adopted and emerging local plan policies that state that planning permission for permanent new residential development will not be permitted within the identified CCMA. This also includes replacement dwellings and changes of use of other buildings to permanent residential accommodation. For further clarity, this relates to all types of residential use, such as individual dwellings, sheltered housing, student accommodation, hostels, shared housing for disabled people, nursing homes and care homes, residential education and training centres.
- 3.16 If non-permanent residential development/ use is being proposed, an applicant should refer to the temporary and time-limited development/ uses section.

New non-residential development

- 3.17 Significant new build development of a permanent nature and that is not associated with an existing building and/or use, is unlikely to be appropriate within the CCMA, whatever its proposed use. However, where there is clearly a benefit to the wider community arising from the proposed development, for example, community infrastructure, then that will be a material consideration to be balanced against the risk implications. Depending on the degree of risk, such development could be considered as appropriate in the medium and long-term epochs, with the imposition of suitable planning conditions so as to maintain the value to the community in perpetuity (or at least throughout the lifetime of the development).
- 3.18 However, within the medium to long term risk areas, a wider range of time limited development and uses may be appropriate. This could include, but is not limited to, cafes, hotels, shops, offices or leisure uses requiring a coastal location that have substantial economic and social benefits to the local community.

Temporary and time-limited development/ uses

- 3.19 Temporary and time-limited development within a CCMA relates to development proposals that requires a coastal location and can be granted planning permission for a specific period of time in order to;
- reduce the risk to people and the development by taking account of the assessment of vulnerability; and
 - manage the removal of the development to minimise the impact on the community and on the natural and historic environment.
- 3.20 Development that is temporary (whether by its nature or by limiting its planning consent) is unlikely to constitute an increase in property or life at risk, provided it can be controlled in order to ensure its removal or relocation prior to the erosion risk becoming imminent. Temporary or time-limited development will often be considered as an appropriate response to coastal change and can help facilitate ‘adaptation’ to change. Also, as stated in the PPG⁴, ‘The use of modular forms of construction can mean buildings can be disassembled and reassembled in a new location as a way of minimising the cost of relocation.’ Such temporary and time-limited uses include, but are not limited to, use of land for caravans, mobile homes, temporary structures and land for open storage. In addition, some types of non-permanent residential development could be acceptable.
- 3.21 The result of such temporary development could, however, (individually or cumulatively) give rise to positive or negative impacts with regards to the character or viability of a settlement in the longer-term and this would not be considered in relation to the longer-term sustainability of that community.
- 3.22 It is difficult to define the lifetime of specific developments here, as each will have different characteristics, be located in a different part of a CCMA and potentially where a site spans across more than one risk area. Applicants would be expected to justify why they have adopted a given lifetime for the development when they are formulating their Coastal Erosion Vulnerability Assessment (CEVA) (see CEVA section). Developers, the Local Planning Authority and the Environment Agency should aim to agree what lifetime is acceptable, having regard to the anticipated impacts of coastal change taking into account climate change. Where the lifetime of the development is prescribed by the time in which coastal change is anticipated to impact on it, the lifetime of the development will be controlled by a specific time limited planning condition. Such a condition would require the review of the permission in relation to rates of coastal change and ensure the removal of the development prior to the anticipated impact of the coastal change. The condition would also be re-applied to a renewed planning consent, where erosion has progressed at a lower rate than predicted.
- 3.23 The lifetime of a non-residential development depends on the characteristics of that development. Applicants would be expected to justify why they have adopted a given lifetime for the development, for example, when they are preparing a Coastal Erosion Vulnerability Assessment

Open Land Uses

- 3.24 Open land uses (i.e. uses with no buildings) are likely to be appropriate within the CCMA and indeed may be encouraged as part of the implementation of ‘roll-back’ proposals.

Changes of Use

- 3.25 Changing the use of a building can often be the best means of securing a beneficial use for a development where its original use may no longer be viable (perhaps because of the risk of erosion, or the blighting effect of the threat). This may in part be an appropriate form of adaptation in response to coastal change. However, where planning permission is required, the proposed change of use could give rise to an increase in the intensity of use and potentially, therefore, increase risk to life. Where the latter is the case, a CEVA would need to demonstrate that the risk can be mitigated, which could then be secured by means of conditions in order, for example, to limit the lifetime of the new use.
- 3.26 For example, the re-use of dwellings that could be used for other purposes would support coastal change adaptation by removing the permanent residential status of the property at risk and granting a time-limited change of use permission for an alternative lower risk use. This could also provide householders with some financial assistance to help develop in an alternative location and in the short term, would remove the burden of demolition and land restoration costs for householders. Potential alternative uses will largely depend on the position of a dwelling within the CCMA, but could include temporary use as holiday accommodation, community facilities or other time limited commercial uses.

Extensions (including householder development)

- 3.27 Extensions are frequently proposed within a CCMA in order for property owners to be able to meet their changing needs. In areas exposed to coastal erosion risk, a property owner's choices are likely to be restricted by the limited life-expectancy of their building (or its suppressed value as a result of that) making it more difficult to sell or raise funds. The benefit arising from a proposed extension will need to be weighed against any increase in the property or life put at risk and possibly the expected life of the property.
- 3.28 For extensions to properties within the risk zone associated with the first epoch to be permissible, the applicant will need to provide information within a CEVA to demonstrate any likely increase in vulnerability, with regards to risk to life and property. Beyond the first epoch it would seem unreasonable to restrict extensions where, in the context of the existing risk to life and property, the increase is minimal. The appropriate test may be whether the proposal is clearly subordinate to the existing property.

Intensification of Use (non-residential)

- 3.29 Intensification of the use of a building can increase the extent of risk to life, particularly where it is occupied on a permanent basis, but it is unlikely to increase the magnitude of property at risk. Intensification of use could be a means of improving the viability of a use, by securing greater investment in the maintenance of a property, which will be important in helping to counterbalance the degenerative effect of blight associated with coastal change. Proposals for intensification will frequently not need planning permission, but where they do, they will need to be considered in light of the existing risk.
- 3.30 For intensification of the use of properties within the risk zone associated with the first epoch to be appropriate, an applicant should demonstrate that any increase in risk to life can be mitigated, for example through conditions or legal agreements. Beyond the first epoch, the principle of the

intensification of a non-residential use is likely to be acceptable in the context of the existing risk to life, as the increase is likely to be minimal. The degree of control over the occupancy or use of the property may be pertinent, for example, if the proposal involves increasing the occupancy (either through the total number or extending the period of occupancy) of a building that is run or managed as part of a wider business this could pose less of a risk than an independently occupied building.

Redevelopment or reconfiguration of existing sites (non-residential)

- 3.31 An applicant with a proposal for redevelopment will be encouraged to consider relocation of the development to a site beyond the CCMA. If relocation is not considered to be possible then redevelopment will be considered in terms of the magnitude of property and life at risk. If the proposal is substantially larger than the existing building (beyond any permitted development, which could be exercised) or is designed so as to encourage more intensive use, then the above guidance relating to extensions or intensification (as appropriate) would apply.

Replacement of Development Affected by Coastal Change (non-residential)

- 3.32 This requires that development is relocated to a site beyond the CCMA. However, there may be some circumstances where the removal of development from a short-term risk zone and its replacement in a longer-term risk zone would be an acceptable part of an adaptation plan, particularly if the relocated uses would not increase the overall risk to life or property.
- 3.33 It is unlikely that the replacement of development in the short-term risk epoch with one in the same risk epoch would ever be appropriate. However, there may be sites that span at least two of the risk epochs, for example, a holiday park, which seeks to relocate caravans at most imminent risk (closest to the cliff top) to a location further inland. Even if the new part of the site is within the CCMA the overall risk would be the same (although its imminence would be reduced). Such adaptation is more flexible to the changing circumstances of a coastal site, which can reduce vulnerability, increase resilience and potentially raise funds to facilitate relocation. Such coastal roll back and adaptation forms of development are discussed in more detail in Chapter 5.

Essential Infrastructure and Community Uses

- 3.34 Essential infrastructure and community uses that are fundamental to the normal functioning of a settlement can be considered appropriate within the CCMA, where it can be demonstrated that there is no other more suitable location that is feasible. Suitable conditions/ legal agreements would be put in place to secure its removal at the appropriate time.
- 3.35 In all of the above cases, where planning permission is required, the appropriateness of a development needs to be informed by a Coastal Erosion Vulnerability Assessment (CEVA), which should demonstrate that a development would be safe over its planned lifetime and that it will not have an unacceptable impact on coastal change. In addition, development proposals should demonstrate that they would provide wider sustainability benefits that outweigh the predicted coastal change impact.

Coastal Erosion Vulnerability Assessment (CEVA)

- 3.36 The purpose of this section is to provide further detail and guidance on the need for and content of a Coastal Erosion Vulnerability Assessment (CEVA). It is important to take a risk based approach to new development in all areas at risk of coastal change. However, this needs to be balanced against the need to help maintain the integrity of coastal communities and businesses. Therefore, it is recognised that some forms of development or land use within the CCMA may be appropriate, providing the long-term aims of supporting adaptation to coastal change can be achieved and it does not add to existing risks.
- 3.37 A Coastal Erosion Vulnerability Assessment (CEVA) will establish whether proposed new development will be appropriate in a given location. The matrix below (Table 2) indicates which development proposals would be expected to prepare a CEVA, the level of detail required in relation to different types of development and in different locations. It is advised that applicants check with the relevant Local Planning Authority to ensure that a CEVA is required for the location of the proposed development and if required, agree the scope of the CEVA with the shared Coastal Partnership East Team.
- 3.38 As part of the planning process, the CEVA will be checked by the shared Coastal Partnership East Team to ensure that it has been prepared to an appropriate level of detail and is objective in its findings. If this is not the case, the applicant will be advised of where the CEVA needs improvement. On receipt of a compliant CEVA, the shared Coastal Partnership East team will provide a formal response on the application to the relevant planning team. To ensure the preparation of a compliant CEVA with the submission of a planning application, applicants are advised to consider pre-application advice from the relevant Local Planning Authority.
- 3.39 The purpose of the CEVA is to ensure the applicant:
- is aware of and understands the relevant policies associated with coastal change;
 - has demonstrated that the development will be safe through its planned lifetime, without increasing risk to life or property, or requiring new or improved coastal risk management measures;
 - has demonstrated that the proposed development will not increase the risk of coastal erosion elsewhere, for example from increased groundwater and surface water run-off, resulting in cliff destabilisation;
 - has demonstrated that the development will not impair the ability of communities and the natural environment to adapt sustainably to the impacts of a changing climate;
 - has considered the measures for managing the development at the end of its planned lifetime, including any proposals for the removal or relocation of the development before the site is immediately threatened by coastal change; and
 - that decisions taken on investment are made with a full understanding of the risks and uncertainties.
- 3.40 For practical reasons it is difficult to define the lifetime of development as each development will have different characteristics. For guidance, new permanent residential development should be considered for a minimum of 100 years, and non-residential development should be considered to have a lifetime

of at least 75 years³¹. However, there is significant complexity and variety in the characteristics of non-residential development and therefore 75 years should be the starting point for assessment rather than a definitive figure. Applicants will be required to justify why they have adopted a given lifetime for the development when they are formulating their CEVA, and must demonstrate that the risks have been adequately assessed against the economic, social and environmental benefits of the development within the CCMA.

3.41 As a starting point, in attempting to justify a different design lifetime for a non-residential development proposal than that of 75 years, the following non-exhaustive list should be considered:

- the proposed land use/s,
- whether the development would be permanent or temporary,
- the vulnerability to coastal erosion of the proposed development, and
- the ease and speed with which the proposed development could be moved, adapted or demolished.

3.42 If the development proposal comprises a mix of uses or different characteristics that would warrant the identification of multiple design lifetimes for elements of the overall development, the CEVA should adopt the longest development lifetime. For example, if a development proposal comprised a mix of permanent residential, retail and office uses, it may be considered that the development lifetime of the retail and office elements would be less than that of the 100 year residential element, perhaps 75 years. In this situation the CEVA should adopt the 100 year lifetime as the lifetime for the whole development proposal. Alternatively, the CEVA could comprise a number of assessments, each evidencing a different design lifetime for a specific element of the overall development.

3.43 The detail contained in the CEVA should be proportionate to the degree of risk and the scale, nature and location of the proposed development. Reflecting the requirements of the relevant Local Plan policies, the matrix below (Table 2) indicates which development proposals would be expected to be supported by a CEVA, the level of detail that would be required in relation to different types of development and in different locations.

3.44 The Broads has not identified a CCMA within its Local Plan due to their small stretch of coast and its undeveloped nature. The Broads therefore does not feature in the table below.

Table 2: CEVA matrix for development types

Local Plan	Check	Permanent residential development	Non-residential development	Temporary development & uses (e.g. caravans)	Extensions to existing development	Modifications to existing development
East Suffolk Council	Within CCMA	Not permitted	Level B	Level B	Level B	Level A

³¹ As evidenced at paragraph 006 of the Flood Risk and Coastal Change PPG:
<https://www.gov.uk/guidance/flood-risk-and-coastal-change>

(Suffolk Coastal Local Plan)	30m risk zone ³²	Level B	Level A	Level A	Level A	Level A
	30m – 60m risk zone landward of coastal risk management structures in areas of soft cliffs ³³	Level B	Level A	Level A	Level A	Level A
East Suffolk Council (Waveney Local Plan)	Within CCMA	Not permitted	Level B	Level B	Level B	Level A
	30m risk zone	Level B	Level A	Level A	Level A	Level A
Great Yarmouth Borough Council (Great Yarmouth Local Plan Core Strategy)	Within CCMA	Not permitted	Level B	Level B	Level B	Level A
	30m risk zone	Level B	Level A	Level A	Level A	Level A
North Norfolk District Council (North Norfolk Core Strategy)	Within Coastal Erosion Constraint Area (CECA) ³⁴	Level B	Level B	Level B	Level B	Level A
North Norfolk District Council (emerging Local Plan)	Within CCMA	Not permitted	Level B	Level B	Level B	Level A
	30m risk zone	Level B	Level A	Level A	Level A	Level A

3.45 The different types of development identified in the above CEVA matrix are defined in the above section, from paragraph 3.15.

³² The 30m risk zone should be measured from the CCMA, or in Hold the Line areas from the landward edge of coastal defences.

³³ Policy SCLP9.3 (Coastal Change Management Area) of the Suffolk Coastal Local Plan requires consideration be given to the preparation of a CEVA in areas of soft cliff located up to 60 metres landward of coastal defences where known geological information indicates that the capacity of coastal defences area likely to be adversely affected by development.

³⁴ The North Norfolk Core Strategy identifies a Coastal Erosion Constraints Area (CECA) in policy EN11 (Coastal Erosion) and on its policies map. The CECA functions in the same way a CCMA would.

Level A CEVA

- 3.46 A Level A CEVA would require an assessment of the risk to the development from coastal change over its anticipated lifetime. It must take into account the relevant SMP policies and impacts upon coastal management. The CEVA should also include a statement that accepts the risks and uncertainties associated with development in areas susceptible to coastal change and that policies for coastal management are also liable to change. A standard form is included in Appendix 3.

Level B CEVA

- 3.47 A Level B CEVA is required for higher risk development and areas, as indicated in Table 2 above, and a more detailed assessment will therefore be required.

- 3.48 It would need to consider the following:

- The proposed development location and significance in relation to other properties in the adjacent area;
- The nature and scale of the proposed development;
- The predicted shoreline position in relation to the proposed development under current SMP policy and also with No Active Intervention scenarios;
- The potential for and significance of intervention measures that are required to resist or manage erosion in order to protect land, including the proposed development, from loss during its design life;
- Where appropriate, the timescale for when the proposed development is expected to be lost to the sea.

- 3.49 Development proposals within the CCMA will also need to:

- Consider land drainage and run-off issues, and
- Consider and identify measures for managing the development at the end of its planned life, including proposals for the removal of the proposed development before the site is immediately threatened by shoreline changes and how the construction materials are reused. This will need to be secured by legal agreement (e.g. S106) or condition upon the grant of planning permission.

- 3.50 Before undertaking a Level B CEVA it is advised that an applicant contacts the shared Coastal Partnership East Team to discuss its scope and content. A standard form is included in Appendix 3 setting out essential requirements for the Level B CEVA, but this should be used as a guide only. The form should only be completed by an appropriately competent person. Further information or greater detail may be necessary for some types of development.

4 ROLLBACK AND RELOCATION

Introduction

- 4.1 Across the SPD area there are a number of residential and commercial properties as well as businesses, and key infrastructure including roads and pathways, situated within the Coastal Change Management Areas, and at risk from erosion. This can have a direct effect upon the long-term sustainability of affected coastal communities, for example through the erosion of land, to the potential effects emanating from ‘blight’ and a reduced desire to invest in those properties and the wider area.
- 4.2 In light of these effects upon coastal communities, national policy requires local plans to make provision for development and infrastructure that needs to be relocated from Coastal Change Management Areas. Planning practice guidance advises that either formally allocating land in a Local Plan, or allowing for relocation where planning permission would normally be refused are two ways in which this could be achieved.
- 4.3 In response, each planning authority¹ within the partnership area includes policies in their Local Plans to help proactively rollback or relocate development in areas of risk to those areas further inland that are deemed ‘safer’ in a timely fashion, before they are impacted by coastal erosion.
- 4.4 The relevant policies with respect to rollback and relocation from each Local Plan³⁵ are set out below:
- Policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk) - North Norfolk Core Strategy, Policy CC6 Coastal Change Adaptation – emerging Local Plan
 - Policy E2 (Relocation from Coastal Change Management Areas) - Great Yarmouth Local Plan Part 2
 - Policy WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion) - Waveney Local Plan
 - Policy SCLP9.4 (Coastal Change Rollback or Relocation) - Suffolk Coastal Local Plan
- 4.5 The purpose of this chapter of the SPD therefore is to provide further detail and guidance on the interpretation of the above policies, particularly upon common issues such as how land or sites may be identified for rollback or relocation purposes; how such land may be acquired or identified; and how land, which has been vacated, should be managed or utilised in the future to the point at which it eventually eroded. The exploration of these issues has framed the sub-headings of this chapter below.
- 4.6 It is important to note that at the present time the Government does not offer ‘compensation’ for properties lost as a result of coastal change. Compensation is not a matter which can be considered under planning policy. Some government funding can be accessed to assist with demolition of residential properties under a Coastal Assistance Grant if they were purchased before 15 June 2009.

³⁵ The Broads Local Plan does not include any policies relating to rollback and relocation

Residential land-uses affected by coastal erosion

- 4.7 The timely relocation or rollback of residential dwellings (in other words, well before they are at imminent risk of falling into the sea) is a key aim of the Local Plans, and is also in line with national planning and DEFRA policy. For this reason, differing weight may be given to some planning policies to help facilitate relocation.
- 4.8 When identifying alternative areas or land to enable sites to roll-back or relocate residential properties to, the Local Plans require those alternative areas to be compliant with a number of policy criteria. Whilst some of these criteria are shared by each Local Plan there are some differences, which reflects the nature and purpose of individual plans, and therefore greater interpretation on these matters are explored further below:
- 4.9 **General locational principles** ‘
- 4.10 The North Norfolk (EN11) and Great Yarmouth (E2) Local Plan policies are broadly similar in their approach when guiding alternative areas or land to enable sites to roll-back or relocate residential properties to. These require sites to be within or adjacent to identified settlements, whilst outside either the Coastal Change Management Area (Great Yarmouth Local Plan) or Coastal Erosion Constraint Area (North Norfolk Local Plan).
- 4.11 Whilst the terms ‘identified settlement’, ‘Coastal Change Management Area’ and ‘Coastal Erosion Constraint Area’ are clearly defined within both Local Plans, the term adjacent is not. In most circumstances the preference will be for development to share a land boundary with an existing settlement (for example adjacent to a settlement’s development limits/boundaries) as this helps to maintain a more sustainable form of development and helps to reduce the potential for isolated dwellings in the countryside.
- 4.12 Notwithstanding this preference, the term may also be more flexibly applied in order to take into account the prevailing character or function of each settlement, and in circumstances where it is not possible to share a land boundary e.g., where settlements do not have development limits/boundaries.
- 4.13 Similarly to the Great Yarmouth and North Norfolk Local Plans, the Waveney (WLP8.26) and Suffolk Coastal (SCLP9.4) Local Plan policies also require relocated sites to be located outside of their respective Coastal Change Management Area. Whilst there is no requirement for site’s to be ‘adjacent’ to development limits/boundaries, the policies do permit relocation or rollback outside of settlement boundaries³⁶, but also requires those locations to exhibit a similar or improved level of sustainability with respect to access and facilities as per the original dwelling.
- 4.14 In simple terms this means that in interpreting the policy, the applicant will need to clearly demonstrate that the occupiers of the roll-back or relocated dwelling will not be disadvantaged with respect to accessing facilities (e.g. primary school, food shop, bus services, employment opportunities etc) than the location the original dwellings was in; and where possible, demonstrate an improved level of access to such facilities.

³⁶ Equivalent term to development limits or development boundary

- 4.15 Under all the Local Plans, there remains a strong preference for all sites to be able to access the nearest settlements and facilities safely and where possible via non-motorised travel modes (cycling, walking) to avoid car trips being necessary for even short journeys.
- 4.16 The locational principles of relocated properties also need to consider how it would appear to be 'read' in the local landscape and townscape. Given that many potential relocation sites would be within the Norfolk Coast AONB, Suffolk Coast and Heaths AONB, or potentially move development nearer to the Broads Area, there will be particular sensitivities about the landscape impact of any relocated dwellings, although some limited relaxations to the application of Local Plan AONB policies may be necessary in the overall planning balance to help facilitate relocations/rollbacks (for the public good). Local Plan policies on landscape character and setting generally (as well as AONBs) must be considered appropriately.
- 4.17 More generally in relation to landscape, it is important that, as far as it practicable and appropriate to the prevailing character of the area, that relocated dwellings are not 'read' as isolated dwellings (but are visually integrated as part of a the (nearby) community.
- 4.18 Various other elements of the appropriateness of relocation sites may need to be considered too, particularly including (but not necessarily limited to) the potential impact on listed buildings, conservations area, flood risk, as well as the application of relevant neighbourhood planning policies.

Size of replacement/relocated properties

- 4.19 The Great Yarmouth and North Norfolk Local Plans generally expect relocated dwellings to be of a comparable scale (i.e. "like for like") to the dwelling that it is replacing. Whilst this is not a policy requirement in the Waveney and East Suffolk Local Plans, clearly the size of any relocated dwellings will require a level of consideration in the planning balance, alongside other landscape and design policies in order to minimise the risk of unnecessarily larger homes impacting upon the undeveloped countryside.
- 4.20 In general it is recognised that there may be circumstances where greater flexibility in the scale of relocated properties is needed, for example where this concerns matters of viability or improved standards of living. Therefore, where Local Plans do require relocated dwellings to be of comparable scale, applicants will be expected to provide clear justification in these circumstances in order for the Local Planning Authorities to appropriately balance the viability of the proposal, the needs of the owner or community and the need to safeguard other interests including the setting of the countryside.
- 4.21 Irrespective of the currently adopted Local Plans, permitted development (PD) rights are normally available to increase the size of a house after it has been built (without express planning permission needing to be applied for). However, if permitted development limits have already been reached or exceeded by the original building now being replaced, no further permitted development will be allowed for the replacement dwelling, Any planning consent will include a condition that will require a planning application for any future extensions or outbuildings.
- 4.22 If the original dwelling has not already used its permitted development allowance, the new building would be allowed to be designed and constructed to include the additional space that would normally be permitted once the dwelling was occupied. In such cases, planning permission will be granted with

a condition that would prevent further extensions or outbuildings without the submission of a further planning application (in other words, with the permitted development rights withdrawn).

Commercial, community, business, infrastructure and agricultural uses affected by coastal erosion

Identifying alternative areas or land

- 4.23 The relevant Local Plan policies are intended to aid coastal business owners and commercial operators to make longer-term decisions about investment and growth. For obvious operational and business reasons, it will not always be practicable to relocate businesses to sites outside the Coastal Change Management Area (for example, a tourism business that relies on its seashore location).

For this reason, some types of development will be permitted inside the CCMA (see table 1 – Development Matrix). Careful consideration of the precise risk in the particular area will need to be undertaken through a Coastal Erosion Vulnerability Assessment (CEVA).

- 4.24 The phasing or timing of relocation can be critical to the success of any rollback scheme. For practical and operational reasons a relocation may have to be spread over an extended period of time (a caravan site, for example). This can have implications for local communities as it could lead to a longer period of construction. At the same time it is recognised that an extended period of time may be needed to help absorb the costs and potential loss of business before the new site is fully established
- 4.25 Opportunities to relocate and redevelop within existing site boundaries may also be appropriate. This could include moving buildings away from the cliff edge to vacant land; reconfiguration of the layout of buildings within the site; reusing more vulnerable parts of the site for open land uses or other temporary uses. Therefore, in the short-term risk area, proposals for temporary uses, open land uses, some changes of use and small extensions may be acceptable. In both the medium and long-term areas within the CCMA, where the CEVA demonstrates there will be no increased risk to property or people as a result of the development, larger extensions, new buildings and some intensification of use may be permitted. A balance will need to be made between the risk associated with retaining a coastal location and the wider economic benefits for the operator and wider community. Proposals for development that demonstrates that this is the case and that the longer term coastal risk planning is incorporated, will be supported.
- 4.26 Where relocation to a new site is necessary, this should normally be located where it is accessible (or well-related³⁷) to the community from which it was displaced. Though this will depend on the specific type of use being relocated, this will normally mean no more than 100-200m away from the existing community and with appropriate highway links for vehicular and non-vehicular traffic.
- 4.27 There are some sports grounds and courses which are located on the coast, such as football pitches. Whilst some sports facilities are only for the benefit of their membership, almost all allow visitors and some are available to the public (to hire, for example). Some coastal golf courses are at high risk, as

³⁷ As per North Norfolk Local Plan Policy EN11

often they are on undefended stretches of the coast; Royal Cromer and Gorleston are two courses under particular threat of 'losing' some holes.

- 4.28 Golf courses often have a dual role, firstly as a local sporting, leisure and cultural facility (they often have a restaurant, bar and function rooms, for example) and secondly as an important tourist location for golfing societies and golfing holidays. Therefore, it is important to retain golf courses where at all practicable. It may sometimes be possible to create new holes inland to replace those under threat, depending on land availability (and other considerations); this would be supported in principle. Some enabling development might be considered necessary to support the creation of new holes and this is discussed in Chapter 6
- 4.29 Where a business or commercial use does not rely on a coastal location as part of its overall business plan, timely relocation to a site outside the CCMA would be supported. Short-term re-use of buildings/land that become vacant may be suitable for alternative uses, but will be subject to time limited planning conditions to manage risk.
- 4.30 To help businesses and commercial uses relocate to alternative sites outside the CCMA, there may be support for the development of mixed-use schemes to assist the viability of new proposals. This could take the form of new residential or retail developments but will be subject to applicants demonstrating that the scheme will not be viable without the inclusion of other forms of development. Additionally, enabling development if proven to be necessary will only be permitted on appropriate sites in sustainable locations. This will depend on the specific purpose of the enabling development and considered in the planning balance of other policies in the respective local plans. It would also be expected that any enabling development would only be a small proportion of the new development (see Chapter 6 – public benefits).

Relocation of car park at Happisburgh (See case study for details) but erosion is clearly seen



Habitats affected by coastal erosion

- 4.31 Large areas of the coast which are most severely affected by coastal erosion are also of exceptional importance with respect to rare, endangered or vulnerable natural habitats and species. In particular the coast of North Norfolk, and smaller stretches around Winterton-on-Sea and between Kessingland and Southwold include Special Protection Area and Special Areas of Conservation which are within the National Site Network. These are defined as sites of highest international importance for birds, flora and fauna.
- 4.32 All of the respective local planning authorities across the SPD area have a statutory duty under the Countryside and Rights of Way (CROW) Act 2000 to protect these along with other nationally and internationally designated sites.
- 4.33 Although it is not always possible to replace habitat lost as a result of coastal erosion, development on rollback sites may provide opportunities to introduce biodiversity net gain, such as the planting of trees, new heathland etc, helping to provide greater public benefits to the local community and therefore will be encouraged through proposals.

Remediation, demolition and treatment of existing sites and their uses

- 4.34 The Local Plans generally expect that any dwellings or buildings that have been vacated on the existing site, due to the imminent risk of coastal erosion, are demolished in their entirety, including all physical remains and materials that form the foundations and services, if there is no agreed temporary use. This is to ensure that no material is left on the site that could result in harm to anyone as a result of cliff fall or environmental degradation. It also ensures that the appearance of the site is left clear and tidy as much of the coast across the SPD area is exposed and set against a backdrop of visually sensitive landscapes including AONBs. However, in many circumstances the removal of below ground structures and services could hasten erosion and may not be safe to complete. Advice should be sought from the Coastal Partnership East team and the Local Planning Authority as to the level of removals required. Where materials or below ground structure remain, a monitoring and removal plan (from the beach) may be needed.
- 4.35 Landowners will also be responsible for removing any other structures or vehicles from their land, whether above or below ground, that are subsequently affected by coastal erosion.
- 4.36 The demolition of a building may require planning permission or 'prior approval' from the local planning authority beforehand, therefore advice should be sought from the relevant local planning authority before any demolition work is carried out.
- 4.37 As discussed in the previous chapter, the re-use of existing dwellings for either temporary residential or alternative lower-risk uses (until coastal erosion forces permanent abandonment) may be appropriate and may help to provide households or businesses with some financial assistance to fund the costs of bringing forward alternative rollback sites or help meet the cost of remediating existing sites.

- 4.38 Other grants or financial assistance measures become occasionally available which can also help fund the cost of demolition or remediation, therefore applicants are advised to contact Coastal Partnership East for more information.
- 4.39 Irrespective of the grant or funding model used, planning permissions granted for time-limited uses, and if the site is cleared, must include conditions tied to a Section 106 Agreement setting out the future site management and demolition requirements at an agreed date.
- 4.40 There is a requirement through the Local Plans that once cleared, existing sites should be put into a use that is either beneficial for the local community or which can appropriately adapted to the anticipated change, for example open space or agricultural uses. Whilst each future use will be determined on their individual merits, proposals which help to restore or create habitat will be particularly welcomed.

Acquisition of land for relocation and rollback

- 4.41 There is no single preferred approach when seeking to acquire sites for relocation or rollback purposes as this will ultimately be dependent upon the individual circumstances of the development and/or the business use in question.
- 4.42 In some circumstances local planning authorities may be able to help facilitate developments through a joint venture with the local community, as was the case in the relocation of 9 properties at Happisburgh (see the case study elsewhere in this SPD for more details). However, such a model remains a developing area and therefore the Local Planning Authorities encourage engagement from and with applicants at an early stage.
- 4.43 Applicants may also wish to consider other 'longer-term' routes to establish areas for potential rollback. This could include promoting land for rollback use by working with the Local Planning Authority or parish council during the preparation of their respective Local Plans and Neighbourhood Plans.
- 4.44 Coastal Partnerships East (CPE) secured significant funding from Defra as part of the Flood and Coastal Resilience Innovation Programme (FCRIP), which is running from 2022-2027. CPE will be working with four communities in Norfolk and Suffolk, plus four additional 'twin' locations, to deliver adaptation and resilience options which will be applicable more widely. This will include planning, engagement, technical financial and policy tools to support coastal transition. See <https://engageenvironmentagency.uk.engagementhq.com/esf008-coastal> for more details.
- 4.45 North Norfolk District Council has been selected to deliver the Coastal Transition Accelerator Programme (CTAP) which will seek to work with communities, and business in developing Transition Plans and practical actions to seek to prepare for coastal change. This programme will be delivered between 2022-2027 and will help shape future government support. More details can be viewed at [North Norfolk Coastal Transition Accelerator Programme \(CTAP\) | Engage Environment Agency \(engagementhq.com\)](#)

5 'ENABLING' DEVELOPMENT

Introduction

- 5.1 This chapter focuses on the circumstances when and how 'enabling development' may be considered appropriate/necessary to help support/enable coastal adaptation/rollback measures and proposals.

What is 'enabling' development?

- 5.2 'Enabling' development is development that may ordinarily be contrary to certain planning policies of the relevant Local Plan (and/or the NPPF) but would secure a particular public benefit or benefits which may be considered to outweigh the disbenefits or harms from departing from policy. Normally it is development which is asserted to be needed to generate additional money to help fund the main development or works.
- 5.3 For example, in bringing forward an "exception" site for affordable housing outside a settlement boundary, it is sometimes asserted that a number of additional "market" housing units are necessary to ensure that the scheme is financially viable and thus deliverable. In this context, the market housing units constitute the 'enabling' development – they are contrary to planning policy, but may be concluded to be necessary to 'enable' the "exception" site to go ahead, and so bringing its benefits.
- 5.4 In addition to affordable housing, other kinds of development for which enabling development may be sought include (but are not necessarily limited to) new/extended/relocated commercial buildings, historic buildings or sporting facilities. The relocation/rollback of properties and businesses from at-risk coastal areas can also sometimes generate requests for enabling development.

Enabling development and coastal adaptation/rollback

- 5.5 In exceptional circumstance there may be a need for enabling development to facilitate the relocation of properties (such as residential and commercial but also holiday accommodation) at risk from erosion. The cost of relocating properties to alternative sites may, in some cases, need financial support for the purchase of land, building costs and associated development costs to ensure that such a proposal is financially viable (and thus deliverable); enabling development may have a role in the viability of proposals.
- 5.6 Enabling development could also potentially help fund and facilitate rollback of natural habitats at risk from coastal change.
- 5.7 In relation to the five Local Plans and their policies on rollback/relocation, only the Great Yarmouth Local Plan (Policy E2) makes specific reference to enabling development and how any such cases would be assessed. Therefore, if a particular proposal makes an appropriate case for enabling development it would be in conformity with Policy E2. The other four Local Plans do not mention enabling development specifically in their rollback/relocation policies (although some may in supporting text). **However, it is**

recognised that enabling development is an important element to facilitating the longer-term sustainability of coastal communities. Any proposal utilising such an approach should use this guidance and seek further clarification from the relevant LPA so any proposal should be discussed with those planning teams.

Example scenarios for enabling development

5.8 Enabling development can come in many different forms; the key is to demonstrate the public good(s) of the substantive development outweighs the disbenefits of departing from planning policy. The main scenarios that could involve potential enabling development most relevant to this Coastal Adaptation SPD are:

- Relocation of at-risk properties and/or business/es to areas of lesser risk of coastal erosion. The development of the 'new' site and changes to/demolition of the 'old' site may need to be part-funded by enabling development;
- Provision of coastal risk management structures to protect at risk properties and businesses, funded by enabling development elsewhere (see Chapter 6);
- Rollback or creation of natural habitats (e.g. creation/expansion of salt marsh), funded by enabling development elsewhere.

Public benefit(s)

5.9 Explicit in the consideration of enabling development is that there must be a public benefit or benefits flowing from the whole proposal to provide such a justification. In any planning application this/these will need to be set out, and for that reason, it is considered vital that pre-application advice be sought on particular proposals so that early advice can be received from the relevant Local Planning Authority.

The kind of public benefits that may be able to be considered (on a case-by-case basis) are one or more of:

Relocating residential dwellings

5.10 It is obviously important that people live in appropriate accommodation, and when a dwelling is lost or can no longer safely exist in its current location due to coastal erosion, the occupants may need to be re-housed on a temporary basis in emergency accommodation (potentially at a cost to the public purse) and/or on a permanent basis (if eligible for affordable housing). Whilst those in market housing would normally be expected to find their own alternative accommodation if not eligible for affordable housing, it is, unfortunately, the norm for home insurance to not cover coastal erosion events.

5.11 Therefore, the timely relocation/rollback of dwellings can help avoid or reduce these kind of financial losses (as well as the enormous stress and uncertainties associated with losing a house to erosion). This example is considered a public benefit as there are benefits to maintaining communities and housing stock through the wider effect to the local area and local economy as well as saving costly demolition of the property at a later stage, when it is an emergency situation.

- 5.12 A good example of rollback is the provision of seven plots in an allocated site in Reydon, East Suffolk (Land west of Copperwheat Avenue, WLP6.1). This allocation – which now has planning permission – is for approximately 220 dwellings, and seven plots must be made available for the relocation of properties at risk of (or already lost to) coastal erosion. This is discussed in more detail as a case study in Appendix 4.

Relocating tourism accommodation

- 5.13 Coastal tourism is a hugely important part of the economy of North Norfolk, Great Yarmouth and East Suffolk, including the Broads. There are many caravan and camping sites and thousands of holiday homes available to rent, contributing hundreds of millions of pounds to the local economy through direct and indirect spending (on meals out, visiting tourism sites etc). Whilst such businesses tend to be privately-owned, they are also a vital source of employment, again both directly (caravan site staff, cleaners etc) and indirectly (from spending in local restaurants and tourism sites, and local suppliers of good and services to the sites etc). Allowing the continued use of such sites through rollback/relocation can therefore potentially retain considerable public benefits.

Relocating tourism facilities

- 5.14 In a similar way to tourism accommodation, coastal facilities specifically geared towards tourism (like amusement arcades and crazy golf courses) or catering to a mixed tourism and local market (like amusement parks and golf courses) generate considerable economic benefits, both directly (from employment) and indirectly (from wider spending). Such facilities can also constitute part of the wider tourism “offer” (of facilities and attractions) of an area. Whilst the direct public benefits may seem less immediately obvious than for (say) caravan parks, they often still exist. Several examples of where caravan and camping parks have been ‘rolled back’ are included in the case studies.

Relocating business premises

- 5.15 Business premises (offices, factories, industrial units etc) can sometimes be located in the CCMA, sometimes by accident but sometimes by design. As with tourism facilities, although likely to be largely privately-owned businesses they contribute to the local economy and therefore a case may be able to be made for ‘enabling’ development to facilitate their relocation/rollback.

Relocating other types of use/development

- 5.16 Other types of businesses/activities can also seek to roll back or relocate. As an example, there are a number of sports grounds and courses which are located along the coast, such as football pitches. As detailed in Chapter 5, some golf courses are at particular risk from erosion and as the creation of new (replacement) holes and/or clubhouse buildings can be expensive, some enabling development may be considered necessary. Where this is the case, there should be early discussions with the relevant Local Planning Authority about the specifics of the situation, potential ‘solutions’ and the scale, nature and timing of any enabling development options. Given the location of most such courses in one of the Areas of Outstanding Natural Beauty, particular attention will need to be paid to the landscape impacts of the proposal itself, plus any enabling development.

Enabling development to implement coastal risk management structures

- 5.17 Communities or businesses may seek to support the implementation of coastal risk management measures along a stretch of coast in order to increase the resilience of properties or assets that are facing or are going to face the impacts of coastal change. In some circumstances to assist with funding these coastal risk management structures, it may be possible to generate funding through enabling development. For example, a residential development outside of the erosion risk zone may be able to generate funds to contribute towards temporary defences in that community. Each circumstance and location will be different and as such early engagement with the planning team and Coastal Partnership East would be required.
- 5.18 The public benefit of using enabling risk management measures, including structures to increase resilience of properties will be similar to those set out in section 5.5.

Lifespan of the proposed development

- 5.19 When considering schemes that involve or propose enabling development, the Local Planning Authorities will need to understand the lifespan of the proposed enabling development and measures/structures that are to be put in place. Is the proposed enabling development or measures/structures to be permanent or temporary for example? The lifespan of the public benefit associated with the enabling development and related measures/structures could then be understood.
- 5.20 New temporary development that only has a short-term temporary public benefit will not usually be acceptable in justifying enabling development.
- 5.21 Any enabling development put in place will need to be of a form and location that is safe from coastal change for its lifetime. The risk zones as discussed in Chapter 4 will be of relevance.
- 5.22 The Coastal Erosion Vulnerability Assessment (CEVA), as discussed in Chapter 4, will also be required.

Viability and enabling development

- 5.23 Any proposal for enabling development must be accompanied by an open-book Viability Appraisal, which must detail the following, as well as be in line with the relevant LPA's approach to viability:
- The total estimated cost of demolishing/removing existing development, if appropriate (and returning the site to an acceptable condition, if appropriate)
 - The estimated value of the current site afterwards (which may include continued temporary use)
 - The cost of constructing a replacement dwelling/building/complex/facility, which must include (as appropriate):
 - The total estimated cost of acquiring the land/plot (including any loan interest/mortgage payments)

- The total estimated cost of constructing the development (building and servicing costs)
 - The estimated value of the new/relocated development after completion
 - An overall assessment of the viability of the relocation/rollback (values minus costs)
 - If there is an asserted shortfall in finances to deliver a viable relocation/rollback, a clear statement of how much the estimated shortfall is and the assumptions behind this
 - In the event of a shortfall, the net value of the enabling development proposed to help finance the relocation. Allowing for an appropriate margin for flexibilities and uncertainties with costs and values, the enabling development sought should not (in scale, size and value) be substantially greater than is required to fund the relocation/rollback.
- 5.24 The proceeds of any enabling development will be required, through a S106 legal agreement (or other legal arrangement) to contribute any necessary 'gap' funding to enable the development to go ahead.
- 5.25 Any Local Plan /policies and guidance relating to viability assessments must be followed.
- 5.26 Applicants should be aware that the Local Planning Authorities may use appropriate external expertise when necessary to assess viability appraisals. The independent review shall be carried out entirely at the applicant's expense.

Enabling development and legal agreements

- 5.27 In order to avoid enabling development being carried out without the public benefits being achieved (i.e. the relocation/rollback does not happen), a planning obligation will need to be agreed, which will set out how and when the relevant works will have to be carried out.

Key considerations

- 5.28 As well as the potential public benefits, it will be important to consider other impacts, both positive and negative, of the proposal:
- The enabling development is expected to be on the same site the scheme which it is funding. However, this may not always be possible or there may be wider benefits in locating the enabling development elsewhere. The suitability and appropriateness of locating the enabling development elsewhere will be judged on a case-by-case basis. In all cases however, the enabling development will be linked through a legal agreement(s) and/or planning conditions to the scheme it is cross-funding.
 - Where enabling development is proposed to fund new coastal risk management measures, for example, the design of any risk management measures should consider all impacts on the natural beauty of the AONBs and on the Broads. Indeed, for the Suffolk Coast AONB, the 'Suffolk Coastal Sea Defences Potential Landscape and Visual Effects Final Report' and its recommendations is of relevance.
 - Other local plan policies and adopted SPDs/guides and shoreline management plans will also be of relevance. It is important to note that just because the proposal is for enabling development and the aspects addressed in this section of the SPD may be met, there may

be other planning reasons to refuse a scheme. Any departures from policy will be weighed up against the benefits that the enabling development bring.

- The planning history of the site and any previous use of enabling development will be a consideration.
- It would also be expected that the viability appraisal produced to accompany applications for enabling development will show that the amount of enabling development proposed is justified.
- In order to sustain coastal communities, the relocated development and any enabling development should be well-related to the community it was displaced from, where practicable.

APPENDIX 1 – NORFOLK AND SUFFOLK COASTAL AUTHORITIES STATEMENT OF COMMON GROUND COASTAL ZONE PLANNING (SEPTEMBER 2018)

This statement of common ground is between:

- Borough Council of King's Lynn & West Norfolk
- North Norfolk District Council
- Great Yarmouth Borough Council
- Suffolk Coastal District Council
- Waveney District Council
- The Broads Authority

The purpose of this statement is to set out an agreed approach to coastal planning in relation to:

- Demonstrating compliance with the “Duty to Cooperate”;
- Agreeing shared aims for the management of the coast;
- Maintaining and develop a shared evidence base; and
- Recognising the importance of cross-boundary issues in relation to coastal management.

Background

The risk of coastal flooding and vulnerability to erosion along the coast does not respect local planning authority boundaries, and therefore coastal change needs to be considered across a wide geography. There are significant potential benefits to joint working across administrative and professional disciplines in addressing the issues of coastal planning.

A strategic approach to coastal land use and marine planning can benefit from the sharing of both issues and solutions, and inform planning practice. This is particularly the case in light of the similarity and commonality of coastal issues across the signatory planning authorities, the planning duty to cooperate, and the opportunity to build on the benefits of the existing joint Coastal Authority approach such as Coastal Partnership East.

The National Planning Policy Framework (NPPF) states that in coastal areas, local planning authorities should apply Integrated Coastal Zone Management (ICZM) across Local Authority and land/sea boundaries, ensuring integration of the terrestrial and marine planning regimes. ICZM is a process which requires the adoption of a joined-up and participative approach towards the planning and management of the many different elements in coastal areas (land and marine). The recognised key principles which should guide all partners in implementing an integrated approach to the management of coastal areas are:

- A long term view
- A broad holistic approach
- Adaptive management
- Working with natural processes
- Supporting and involving all relevant administrative bodies
- Using a combination of instruments
- Participatory planning
- Reflecting local characteristics

Within the development planning system, local planning authorities should reduce risk from coastal change by; avoiding inappropriate development in vulnerable areas or adding to the impact of physical changes to the coast, as set out in the NPPF. Any area likely to be affected by physical changes to the coast should be identified as a Coastal Change Management Area.

The Flood and Coastal Change Planning Practice Guidance also identifies that land can be formally allocated through local plans for the relocation of both development and habitat affected by coastal change.

Note: Physical change to the coast can be (but is not limited to) erosion, coastal land slip, permanent inundation or coastal accretion.

Shared Aims

- A holistic and “whole coast” approach will be taken, recognising coastal change is an inevitable part of a dynamic coast. A naturally functioning coastline is desirable in principle, but may not appropriate in every location.
- The signatory Authorities will consider the value of aligning policy approaches.
- To have regard to the well-being of communities affected by coastal change and minimise blight.
- To protect the coastal environment, including nature conservation designations and biodiversity.
- To work with local businesses and the wider economy to maximise productive use of properties and facilities for as long as they can be safely and practicably utilised to promote investment, viability and vitality of the area.
- Adopt a balanced risk-based approach towards new development in Coastal Change Management Areas, in order to not increase risk, while at the same time to facilitating affected communities’ adaption to coastal change.
- To promote innovative approaches such as techniques that enable anticipatory coastal adaptation, removal of affected structures and property roll-back or relocation.

Agreed Approach

The signatory authorities agree to work together on coastal planning issues to:

- a) Implement the principles of Integrated Coastal Zone Management;
- b) Develop shared understanding of coastal processes and the development planning implications of these;
- c) Share experience, best practice (including planning policies) and ideas for innovation;
- d) Use the adopted Shoreline Management Plans as a basis for development planning, recognising that defined areas may change in future and giving appropriate regard to emerging replacement Shoreline Management Plans, updated predictions of the impact of climate change or other relevant evidence;
- e) Acknowledge the importance of coastal communities and their economies, and foster their resilience, innovation and vitality;
- f) Recognise the need to relocate or protect infrastructure likely to be adversely affected by coastal change;
- g) Note the need for strategic policies on coastal change, in order to guide neighbourhood planning.
- h) Encourage development which is consistent with anticipated coastal change and its management, and facilitates adaptation by affected communities and industries.
- i) Consider adopting policies to facilitate rollback and/or relocation, potentially including local plan site allocations or facilitating 'enabling' development;
- j) Consider adopting policies which require the use of risk assessments to demonstrate that a development on the coast will be safe for its planned lifetime, without increasing risk to life or property, or requiring new or improved coastal defences; and
- k) Consider adopting policies that seek to ensure that new or replacement coast protection schemes are consistent with the relevant Shoreline Management Plan and minimise adverse impact on the environment or elsewhere on the coast.

This Statement of Common Ground has been endorsed by the following:



Cllr. Ian Devereux
Cabinet member for Environment

Borough Council of Kings Lynn and West Norfolk



Cllr. Hilary Cox
Cabinet member for Coastal Management North Norfolk District Council



Cllr. Carl Smith
Chairman, Environment Committee Great Yarmouth Borough Council



Cllr. Richard Blunt
Cabinet member for Development
Borough Council of Kings Lynn and West Norfolk



Cllr. Susan Arnold
Cabinet member for Planning North Norfolk District Council



Cllr. Graham Plant
Leader and Chair, Policy & Resource Committee Great Yarmouth Borough Council



Cllr. Andy Smith
Cabinet member for Coastal Management Suffolk Coastal District Council



Cllr. Tony Fryatt
Cabinet member for Planning Suffolk Coastal District Council



Cllr. David Ritchie
Cabinet member for Planning and Coastal Management Waveney District Council



Melanie Vigo di Gallidoro Chairman, Planning Committee Broads Authority



Haydn Thirtle
Chair, Broads Authority



Endorsed by the Environment Agency Mark Johnson, Regional Coastal Manager

APPENDIX 2 – ORGANISATION ROLES & RESPONSIBILITIES

Organisation	Scale	Role	Responsibilities
Anglian Eastern Regional Flood and Coastal Committee	Regional	Regional Flood and Coastal Committee	Established by the EA, the AERDCC has the purposes of: - ensuring there are coherent plans for identifying, communicating and managing flood and coastal erosion risks across the catchment area and shoreline, - promoting efficient, targeted and risk based investments in flood and coastal erosion risk management that optimises value for money and benefits for local authorities, and - providing a link between risk management authorities, and other relevant bodies to engender mutual understanding of flood and coastal erosion in the Anglian Eastern region.
Broads Authority	Local	LPA	Prepare Local Plans and Supplementary Planning Documents, support the preparation of Neighbourhood Plans, and determine planning applications.
Coastal Partnership East (CPE is not an organisation but a shared team across ESC, GYBC and NNDC)	Regional	Coastal Partnership	CPE is a coastal management team comprised of the partner local authorities of ESC, GYBC and NNDC, whose role it is to carry out the permissive powers, not duties, of the local authorities as Risk Management Authorities/Coast Protection Authorities. CPE therefore as coastal LAs has permissive powers to manage the coast through constructing and consenting new coastal/erosion risk management measures, monitoring changes or repairing and maintaining existing structures. The team also work with the EA, other statutory bodies, RFCC and EACG to monitor and oversee Shoreline Management Plan policies.
Department for Environment, Food and Rural Affairs	National	Government Department	DEFRA provides the lead policy role for coastal erosion risk management.
Department for Levelling Up, Housing and Communities	National	Government Department	DLUHC provides the lead policy role in coastal erosion planning
East Anglian Coastal Group	Regional	Coastal Partnership	Coastal Groups are comprised principally of coastal management officers from district councils, statutory bodies and the EA, with the role of overseeing the preparation and implementation of SMPs, guiding government policy via consultation responses and sharing information and coastal management best practice at the regional and national levels.

East Suffolk Council	Local	Coastal Erosion Risk Management Authority / Coast Protection Authority	As a coastal erosion Risk Management Authority and lead authority for SMP7, ESC has responsibilities to prepare, implement and monitor SMPs in conjunction with other organisations, deliver coastal erosion risk management activities, work alongside the EA to develop and maintain coastal erosion risk information. CPE, as the coastal management team for ESC, GYBC, and NNDC, undertake these coastal management responsibilities and permissive powers.
		Local Planning Authority	Prepare Local Plans and Supplementary Planning Documents, support the preparation of Neighbourhood Plans, and determine planning applications.
Environment Agency	National	Executive non-departmental public body Risk Management Authority	The EA is responsible to the Secretary of State for Food, Environment, and Rural Affairs (Defra) in England, and as the responsible body for the strategic overview of flood and coastal erosion risk management plays a central role in delivering the environmental priorities of central government. The EA provides a leading and/or supervisory role in the preparation of Shoreline Management Plans. The EA has a strategic overview role for coastal change.
		Statutory Consultee on plan and decision making	The EA is a statutory consultee on the preparation of Local Plans, Neighbourhood Plans, Supplementary Planning Documents and planning applications.
Great Yarmouth Borough Council	Local	Coastal Erosion Risk Management Authority / Coast Protection Authority	As a coastal erosion Risk Management Authority, GYBC has responsibilities to prepare, implement and monitor SMPs in conjunction with other organisations, deliver coastal erosion risk management activities, work alongside the EA to develop and maintain coastal erosion risk information, and permissive powers to maintain a register of structures or features that may affect coastal flood or erosion risk. CPE, as the coastal management team for ESC, GYBC, and NNDC, undertake these coastal management responsibilities and permissive powers.
		Local Planning Authority	Prepare Local Plans and Supplementary Planning Documents, support the preparation of Neighbourhood Plans, and determine planning applications.
Historic England	National	Non-departmental public body	Maintains an advisory role on heritage conservation, for which there are a large number of listed buildings, conservation areas, scheduled monuments, and other heritage designations along the Norfolk and Suffolk coast.

HM Government	National		Creation of legislation and policy governing the operation of organisations and their roles and responsibilities on the coast.
Local Government Association Coastal Issues and Special Interest Group (Coastal SIG)	National		Aims to establish improved governance, management and community well-being to ensure the UK has the best managed coast in Europe. The group is comprised of elected members and officers from coastal Local Authorities.
Marine Management Organisation	National	Non-departmental public body	Responsible for the preparation of Marine Plans and licensing of marine activities, to ensure marine activities such as fishing and the construction of wind farms and ports below the mean high water mark protect the marine environment and coastal communities now and in the future. The East Inshore, East Offshore, and South East Inshore Marine Plans, alongside the UK Marine Policy Statement provide the marine planning framework for the Norfolk and Suffolk coast.
Natural England	National	Non-departmental public body	Maintains an advisory role on nature conservation, for which there are a large number of nature conservation designations along the Norfolk and Suffolk coast.
Norfolk County Council	Regional	Lead Local Flood Authority	Lead local flood authorities have the lead operational role in managing the risk of flooding from surface water and groundwater.
North Norfolk District Council	Local	Coastal Erosion Risk Management Authority / Coast Protection Authority	As a coastal erosion Risk Management Authority and lead authority for SMP6, NNDC has responsibilities to prepare, implement and monitor SMPs in conjunction with other organisations, deliver coastal erosion risk management activities, work alongside the EA to develop and maintain coastal erosion risk information, and permissive powers to maintain a register of structures or features that may affect coastal flood or erosion risk. CPE, as the coastal management team for ESC, GYBC, and NNDC, undertake these coastal management responsibilities and permissive powers.
		Local Planning Authority	Prepare Local Plans and Supplementary Planning Documents, support the preparation of Neighbourhood Plans, and determine planning applications.
Suffolk County Council	Regional	Lead Local Flood Authority	Lead local flood authorities have the lead operational role in managing the risk of flooding from surface water and groundwater.

APPENDIX 3 – COASTAL EROSION VULNERABILITY ASSESSMENT (CEVA) TEMPLATE

Level A CEVA

1. Name:
.....
2. Agent's Name (if applicable):
.....
3. Development Location/Address:
.....
4. Development Proposal:
.....
5. Relevant Shoreline Management Plan (SMP), please tick one (or more):
 - SMP5 - Hunstanton to Kelling Hard
 - SMP 6 - Kelling to Lowestoft Ness
 - SMP 7 - Lowestoft Ness to Landguard Point
 - SMP8 - Essex and South Suffolk
6. SMP Policy Unit covering the development frontage:
7. Risk Band, please tick as applicable to site:
 - 20 years
 - 50 years
 - 100 years
 - 30m risk zone
 - 30-60m risk zone
8. Development category, please tick one:
 - New non-residential development
 - Temporary Buildings, caravans and land uses
 - Extension to existing development
 - Modification of existing development

Statement:

I understand that in addition to the information contained in the SMP the following uncertainties are identified:

- Future sea erosion trends and rates are not able to be predicted with certainty hence forecasts of future shoreline positions are shown as indicative bands of risk at 20, 50 and 100 year intervals.
- Where future policies are based upon the provision and maintenance of structures to resist erosion pressure, it is not possible to guarantee that funding will be available to deliver this objective.
- It is possible that where the provision and maintenance of risk management structures is required to sustain a development over its design life, a contribution toward the cost of structure management may be sought from beneficiaries (including owners/occupiers of properties protected by the structures).
- Policies are reviewed and updated at regular intervals and may be changed to something less favourable than indicated at present.

I confirm that the development proposal is made with a full understanding and acceptance of the risks associated with coastal change contained in the relevant parts of the SMP and also the uncertainties listed above.

9. Signed by the applicant:

.....

10. Printed Name:

11. Date:

Level B CEVA

* NB Before this assessment is carried out the advice of the shared Coastal Partnership East Team must be sought

1. Name:

.....

2. Agents Name (if applicable):

.....

3. Development Location/Address:

.....

4. Development Proposal:

.....

5. Relevant Shoreline Management Plan (SMP), please tick one:

- SMP5 - Hunstanton to Kelling Hard
- SMP 6 - Kelling to Lowestoft Ness
- SMP 7 - Lowestoft Ness to Landguard Point
- SMP8 - Essex and South Suffolk

6. SMP Policy Unit covering the development frontage:

7. Risk Band, please tick as applicable:

- 20 years
- 50 years

- 100 years
 - 30m risk zone
 - 30-60m risk zone
8. Development category, please tick one:
- New residential development
 - New non-residential development
 - Temporary Buildings, caravans and land uses
 - Extension to existing development
 - Modification to existing development

Statement

Please provide detailed answers to the following:

9. What is the nature and scale of the proposed development?
.....
10. What impact will the location of the development have for other properties in the adjacent area?
.....
11. Provide details of the predicted shoreline position in relation to the proposed development. When is the proposed development expected to be lost to the sea?
.....
12. Provide details of measures required to protect the proposed development from loss during its design life. How will the development be safe through its planned lifetime, without increasing risk to life or property, or requiring new or improved coastal risk management structures?
.....
13. How will the development enhance the ability of communities and the natural environment to adapt sustainably to the impacts of a changing climate?
.....
14. Demonstrate that the development will not affect the stability of the coast or exacerbate the rate of shoreline change.
.....
15. Demonstrate that the development will not cause cliff destabilisation caused by the presence of groundwater in or close to the cliff face due to land drainage and run-off issues.
.....
16. Set out details for managing the development at the end of its planned life.
.....
17. Where appropriate provide evidence of wider sustainability benefits that outweigh the impact of coastal change.
.....
18. Any other relevant information.
.....
19. Signed by the applicant:
.....
20. Printed Name:

21. Date:

APPENDIX 4 – CASE STUDIES

Broadland Sands Holiday Park Corton, Suffolk			
Planning Number:	DC/19/2949/COU	Link to application:	https://publicaccess.eastsuffolk.gov.uk/online-applications/applicationDetails.do?keyVal=PV7DI8QXLID00&activeTab=summary
Authority:	East Suffolk Council	Applicant:	Park Holidays UK Ltd
Date of Application: Date of Permission:	2019 2022	Keywords :	Rollback, Adaptation, Tourism

	
Key Details:	• Tourism use but with community benefits including parking for church and public cycle/footpath • Designed to be rolled back as cliff erodes • Potential impact to landscape and setting of Grade I listed church • Creation of cycle and walkways • Creation of parking for the church • Reduction in holiday caravans due to earlier refusal
Details:	The existing holiday caravans are very close to the cliff edge due to erosion. Earlier consent was given for smaller rollback scheme within the existing holiday park but a larger area is needed to accommodate future rollback and growth. To accommodate this the site needs to (partially) relocate to a site to southwest on the western side of the Coast Road and adjoining Stirrups Lane. The scheme includes public walking and cycle ways and provision of parking for the church and green spaces with landscaping. Consent by SCC Highways to reduce the speed limit from 60mph to 30mph to allow for safe crossing to the main site and for the safety of pedestrians and cyclist and users of the car park.



Lessons Learned:	A balance needed to be found in relation to the impact on the setting of the grade I listed church and the economic benefits of the loss of a significant part of the site to coastal erosion. • Early engagement with Historic England was needed to address earlier issues which resulted in a refused application for a larger number of vans over a larger area. • In order to address these concerns, the overall number of caravans was reduced and the boundary pulled away from the south along with an increase in green spaces and increased planting. • The church car park remained in the same location • A number of highways agencies were included (SCC Highways, NCC Highways and Highways England) at the pre-application stage. This was due to the main access being via Hopton in Norfolk the North via the A47 or from Corton (Suffolk) • The speed limit was also agreed by SCC to be reduced from 60mph to 30mph as there will be changes to the entrance and a crossing for pedestrians to access the main site along with potential increase in cyclists along the improved shared footway

Beach Road Car Park and Ramp, replacement Happisburgh, Norfolk

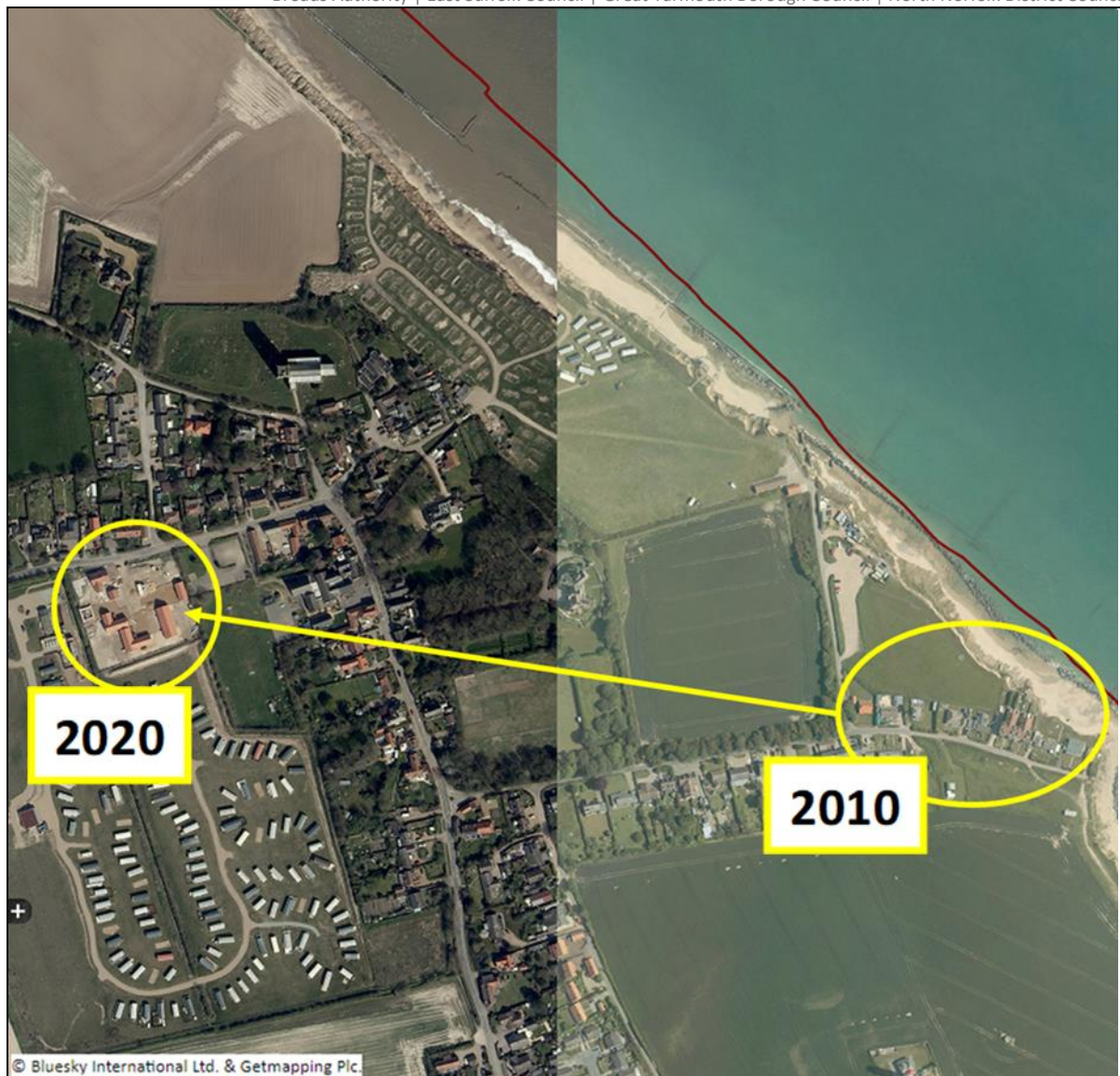
Planning Number:	PF/11/0169	Link to application:	https://idoxpa.north-norfolk.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=ZZZT68LNMS935
Authority:	North Norfolk District Council	Applicant:	North Norfolk District Council
Date of Application: Date of Permission:	2011 2011	Keywords:	Rollback, Adaptation, Community Use



Key Details:	• Community car park and Beach Access Ramp • Designed to be rolled back as cliff erodes • Ramp cut into cliff, no permanent materials used • Car park materials can be moved/retreated when necessary
Details:	As old car park at imminent risk of erosion, new car park developed. No permanent materials used in new car park, designed to be taken up as and when it becomes necessary. Ramp cut into cliff, as ramp erodes away, new ramp is cut into cliff.
Lessons Learned:	The infrastructure needed to be in the risk zone, if planning in the future, consider including longer term relocated access point/rollback location for the car park site in the original application to enable this to be clear and in place when it is required in the future.

Beach Road residential property replacement, Happisburgh, Norfolk

Planning Number:	PM/16/04 28	Link:	https://idoxpa.north-norfolk.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=ZZZT68LNMS298
Authority:	North Norfolk District Council	Applicant:	North Norfolk District Council
Date of Application:	2016	Keywords:	Rollback, EN12, Relocation, Residential, etc

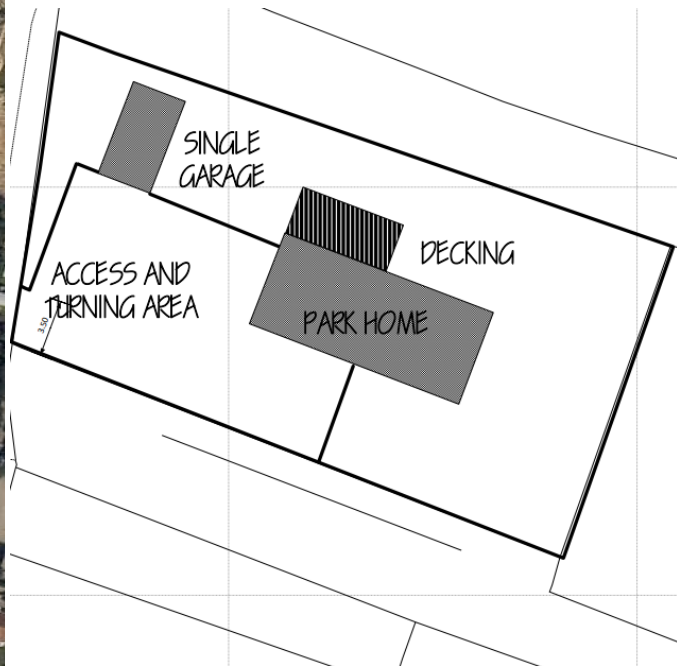
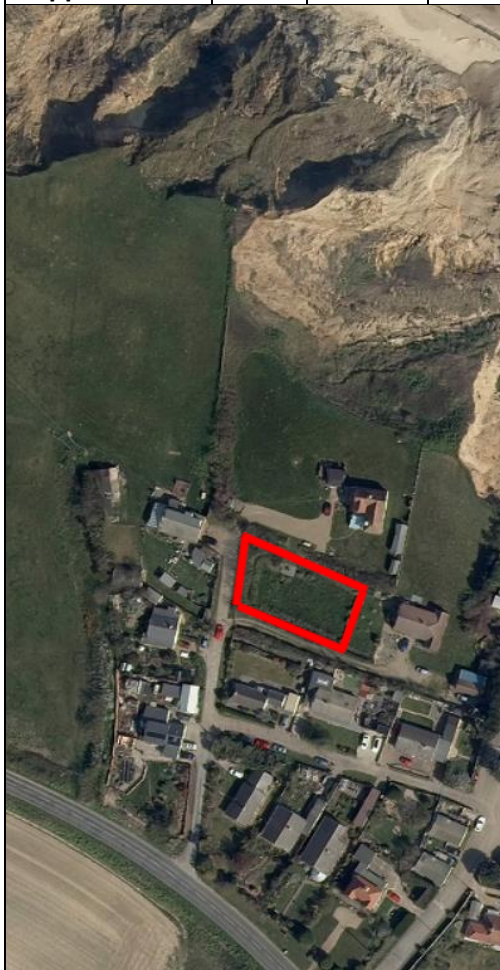


Key Details:	• Using government funding, nine properties at short-term (20 years) risk of erosion were purchased by North Norfolk District Council and demolished • Nine properties of equivalent size gained consent on land within the parish but outside the coastal risk zone. • The land remained in the ownership of a third party and a legal agreement was arranged between the applicant (NNDC) and the landowner. • The land with consent was then sold and developed independently. • NNDC recouped a third of their costs.
Details:	Nine residential properties located within the twenty-year risk zone were purchased by North Norfolk District Council in 2011 under voluntary agreement. The rollback opportunity under local planning policy was secured by letter of agreement before the properties were demolished and the sites cleared and incorporated into wider clifftop open space. Sub-surface foundations and services were left in situ to minimise disturbance to the cliff. An assessment was completed as to where the relocated residential properties could be located. Although the policy allowed for properties to be located at other settlements within the district, it was agreed to seek to retain them within the parish from which they originated, to continue to maintain the viability of the village. Options were explored for a number of sites using viability assessments similar to one used to allocate development sites for local plans. The site was selected as preferred

	based on these criteria and a willing landowner. A legal agreement was established between the developer (NNDC) and the landowner to secure the rollback opportunity and commercial relationship between the two parties. A planning application was prepared and submitted. As with many local developments, there was a mixed response from the local community. These included calls for properties to be affordable homes, rather than open-market dwellings. Planning policy allows for like for like replacement and part of this trial was to understand how cost-viable such an approach would be. The land with planning consent was sold on the open market to a property developer and was subsequently constructed. This was one of the first examples of residential property relocation/rollback, with the purchase of the original properties, associated costs, documents for planning applications, legal agreement, and final profit share on the sale of the development site, approximately one third of NNDC's outlay was recouped.
Lessons Learned:	• May be more effective to facilitate owners using their own EN12 opportunity. • Local Authorities are open to detailed scrutiny in commercial developments, which can be challenging where this may not always chime with wider corporate priorities and aspirations, e.g. social housing provision. • It is not an easy task to identify suitable development sites where the landowner is willing to sell or come to an arrangement. In this case the developer (NNDC) was fortunate. • Using the purchase criteria and redevelopment methodology, in this case study, is not cost neutral to the developer (NNDC). • There was significant local pressure to see at risk properties removed and residents able to relocate, however, there was less appetite for redevelopment in the local area.

Land West of Little Marl, Trimingham, Norfolk

Planning Number:	PF/21/2182	Planning application:	https://idoxpa.north-norfolk.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=QXPQ0HLNJHJ00
Authority:	North Norfolk District Council	Applicant:	Private Applicant
Date of Application:	2021	Keywords:	Adaptation, Epoch 2, Caravan



Key Details:

- Site expected to be lost to erosion in 2025-2055 epoch (epoch 2)
- Applicant had historic permission to build an additional bricks-and-mortar house
- Instead, applied to place a caravan and garage on the site
- This was a preferable type of home, given the risk of erosion

Details:	Applicant had historic permission to build two bungalows on land within Epoch 2 (indicative erosion up to 2055). One bungalow had been built in 1991, so the permission for the whole scheme remained extant. As an alternative to the second bungalow, the landowner sought permission to instead station a caravan on the land and erect a garage, due to the potential loss of land by the impact of coastal erosion. This was seen as a pragmatic approach to the threat of erosion, in line with the preference for adaptation on the coast, given that the caravan would be movable at a future date when it became at risk. After liaising with CPE colleagues, garage was reduced from double to a single non-permanent wooden garage.
Lessons learned	It is advantageous to be open to seek more appropriate solutions for historic live consents.

Easton Lane Easton Bavents, Reydon, Southwold, Suffolk

Planning Number:	DC/15/2428/DEM	Link:	https://publicaccess.eastsuffolk.gov.uk/online-applications/applicationDetails.do?activeTab=externalDocuments&keyVal=NPU1CIQX06000
Authority:	East Suffolk Council	Applicant:	Ms Laura Martin
Date of Application:	08 June 2015	Keywords:	Residential Rollback



Key Details:

- Loss of residential
- Rollback allocation for redevelopment created in Reydon

Details:	• The properties were affected by coastal erosion and were extremely close to the cliff edge. Coastal management team was involved in the process, and this was funded by central government in relation to the pathfinder project. Demolition was considered essential. • Relocation sites were addressed within the Reydon Neighbourhood Plan, but no specific sites were allocated
Lessons Learned	• Residential needs to be considered where there are coastal problems – can be addressed within Neighbourhood Plans • Reydon Neighbourhood Plan has addressed this via paragraph 7.4 RPC <i>Action 5: Support and Protection For Property at Risk From Flooding or Erosion: In support of this Neighbourhood Plan, the Parish Council will support appropriate planning proposals as may be developed in the future for the relocation of properties at risk from erosion at Easton Bavents and any proposals made in the context of the Shoreline Management Plan to protect housing in areas vulnerable to future flooding</i>

Land west of Copperwheat Avenue, Reydon, Suffolk

Planning Number:	DC/19/1141/OUT	Link:	DC/19/1141/OUT Outline Application - Development of up to 220 dwellings with associated open space Land To The West Of Copperwheat Avenue Reydon Suffolk IP18 6YD (eastsuffolk.gov.uk)
Authority:	East Suffolk Council	Applicant:	WM Denny & Son Ltd and Chartwell Industries
Date of Application:	15 March 2019	Keywords:	Residential, including rollback plots



Key Details:	- Some properties at Easton Bavents had been lost to erosion, and others were/are under threat - A 220-dwelling allocation (Policy WLP6.1) was made in the Waveney Local Plan for a site in Reydon - Seven plots are made available for the relocation of properties under threat (or already lost) from coastal erosion

Details:	• An allocation of 220 dwellings (WLP6.1) was made in the Waveney Local Plan, including seven plots for the relocation of dwellings either already lost, or under threat, from coastal erosion • The plots have been included to assist particularly with the loss of (and threatened loss of) dwellings at nearby Easton Bavents • If the plots are not taken up within five years of the rest of the development being completed, the plots will revert to affordable housing • The planning application was submitted in 2019 and a resolution to grant permission was reached at the Planning Committee in March 2020 (subject to the completion of a \$106 legal agreement) • The Reydon Neighbourhood Plan (RNP) was formally ‘made’ in May 2021 and so has full weight in the decision-making process from that date. As the permission had not been issued at that point, it had to return to the Planning Committee for re-determination • One key policy in the RNP (RNP4) requires a planning condition to restrict the use of new open market housing to “principal residences” (i.e. not second or holiday homes) • The application was resolved to be granted, and the outline planning permission was issued, on 16th September 2021
Lessons Learned	• The location of the site adjacent to the Suffolk Coast and Heaths AONB required some sensitive landscaping proposals • Securing the 7 rollback plots as part of the allocation (and permission) was key to assisting with tackling the effects of coastal erosion in the local area • It remains to be seen whether the plots will be taken up by those who have lost (or will lose) their properties to erosion, but they have the opportunity • The principle having been achieved, it is conceivable that future Local Plans could repeat this process on other sites

Seamarge Hotel, Overstrand, Norfolk

Planning Number:	PF/21/23 77	Link to application n:	https://idoxpa.north-norfolk.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=QYTB32LNJUB00
Authority:	North Norfolk District Council	Applicant:	Seamarge Hotel
Date of Application n:	2021	Keywords :	Adaptation, Epoch 2, Hotel



Key Details:	• Historic permission for two storey bricks-and-mortar extension to rear of hotel • Hotel is in Epoch 2 area (indicative erosion up to 2055) • Applied for permission to site seven movable lodges in grounds instead of historic permission • This was seen as a pragmatic approach to the risk of coastal erosion and in line with an adaptation approach
Details:	The hotel sits within Epoch 2 (indicative erosion up to 2055). Applicant already had planning permission to build a two storey bricks-and-mortar extension to the rear. Instead, applied for permission to place seven movable lodges in the grounds. This was seen as a preferable approach, due to the risk of coastal erosion; with the limited lifespan of the extension, it would not have been economically viable to build it. However, unlike a bricks-and-mortar extension, the lodges could be moved at the

	appropriate time. This approach was welcomed as pragmatic, in line with a move towards adaptation.
Lessons Learnt	Flexibility necessary to accommodate business needs and deliver practical solution to historic permission.

Wood Hill Holiday Park, East Runton, Norfolk

Planning Number:	PF/22/03 51	Link to planning application:	https://idoxpa.north-norfolk.gov.uk/online-applications/applicationDetails.do?keyVal=R739MZLN03O00&activeTab=summary
Authority:	North Norfolk District Council	Applicant:	Wood Hill Holiday Park
Date of Application:	2022	Keywords:	Rollback, EN12, Enabling Development



Key Details:	- Hybrid rollback application, with some caravans being moved to the landward side of coastal site, and others being moved inland to a second site. - Well-researched supporting documents, including Coastal Erosion Vulnerability Assessment and Flood Risk and Drainage Assessment. - Enabling Development was used as part of this application.
Details:	The applicant's aim was to rollback the caravans and other facilities out of the 2105 epoch over three stages, beginning in 2022 and ending in 2055. This was to be done in two ways. Firstly, some caravans would be moved to the most landward edge of the site, into land which is currently used for touring plots. Secondly, some caravans would be moved to another site, Kelling Heath, several miles away. In total, the number of caravans in the site closest to the cliff would reduce from 64 to 40, with none of these

	being in the indicative erosion epochs (up to 2105) by the end of phase 3. This application showed considerable forward planning, considering impacts such as water run-off, landscape The applicant's consultants approached CPE beforehand to discuss the wider proposal, including how to remove redundant infrastructure. Several well-researched supporting documents were provided as part of the application, including, but not limited to, a Coastal Erosion Vulnerability Assessment and a Flood Risk and Drainage Assessment. The CEVA identifies coastal erosion risks and how the proposed scheme will seek to mitigate these. Total number of caravans increased from 64 on the site at Wood Hill to 40 on the Wood Hill site and 40 at Kelling Heath in order to ensure development was financially viable. The only question that arose in this application was whether the Kelling Heath part of the rollback conformed to Policy EN12, which requires the new development to be in a location which is well related to the community from which it was displaced.
Lessons learned	• Good use of assessment of coastal risk developed and utilised • Some enabling development • Long term considered planning with early engagement with the coastal and planning teams developed a high quality and well considered proposal. • Monitoring and future removal of below ground infrastructure included.

Manor Caravan Park, Happisburgh, Norfolk

Planning Number:	PF/14/0120	Link:	PF/14/0120 Formation of caravan park to provide pitches for 134 static caravans, 60 touring caravans and camping area with office/warden accommodation and amenity building Land South Of North Walsham Road Happisburgh (north-norfolk.gov.uk)
Authority:	North Norfolk District Council	Applicant:	
Date of Application:	2014	Keywords:	Rollback, Caravan Park, etc

	
Key Details:	- Caravan Park in short term risk zone. - As part of Pathfinder, North Norfolk District Council liaised with the caravan park to help them find a suitable site for the caravan to move to. - After caravans and infrastructure was removed, site was used as cliff-top grassland, providing buffer between village and sea.

Details:	Manor Caravan Park was primarily within the 2025 indicative coastal risk zone (epoch 1) of the shoreline management plan (SMP). Over a number of years, a significant number of static holiday home plots and land had been lost. A temporary consent had been granted to move the most at risk holiday homes onto an adjacent touring area. The holiday park had been identified by the local community as a key asset for the economic vibrancy of the village, with visitors supporting the local public house, shop, post office, etc. As such, NNDC's liaison with the village confirmed there was a desire to ensure the holiday park remained well-connected with the existing village and facilities. North Norfolk District Council provided a business grant to Manor Farm Holiday Park to investigate options to relocate away from the coastal erosion risk zone. These funds were used to complete a site viability assessment including if they may be available. This included landscape visibility assessment as the core part of the village is a conservation area and has a number of listed buildings. Park owner used this information to identify preferred site by which a private agreement was agreed with the landowner, prior to the submission and application. Although the wider community had expressed a desire for the holiday park to remain in a close association with the village, there were a number of objections to the proposed position of the new site. The planning committee refused the application based on the landscape impacts. On appeal by the applicant the application was approved. The new site was prepared and all assets associated with the holiday park were moved. The original cliff-top site was cleared and remains open cliff-top grassland, providing a buffer between the village and the sea. The site is no longer traditional cliff-top park, with regular rows of holiday homes, it has more landscaped layout including hedges, planting to improve biodiversity and visual appearance.
Key Learning:	- Even with significant pre-application work, it does not guarantee a smooth ride with the decision making process. - There are challenges across competing constraints and needs when it comes to relocation and reprovision of assets at risk of coastal erosion. - Where there are perceived landscaping impacts, balance needs to be struck with local economic and community needs and the balance of landscape improvements with asset removal from the coast must be considered. - Where there is a need and a desire, it is possible to relocate whole businesses to make them sustainable and to reduce erosion risk into the future.

The Watch Houses, Easton Bavents, Suffolk

Planning Number:	DC/17/3796/FUL	Link:	DC/17/3796/FUL Demolition of existing single storey building comprising artist studio/gallery. Erection of 2 no. single storey portable holiday let units with associated landscaping, parking & sewage treatment system. Rn Building Easton Lane Reydon Southwold IP18 6SS (eastsuffolk.gov.uk)
Authority:	East Suffolk Council	Applicant:	Easton Farm
Date of Application:	2017	Keywords:	Adaptation



Key Details:	- Loss of farmland and rental properties to coastal erosion meant that landowner had to adapt to make the site viable and maintain income. - Ruined bricks and mortar ex-naval building sat on land. - Application was for demolition of the ruined brick building and the construction of two moveable holiday lets, which could be pulled away as the cliff approaches. - Steel framed, wooden buildings designed with movability in mind; even the foundations can be moved.
Details:	The coast at Easton Bavents is eroding rapidly and the landowners have lost upwards of 110 acres since the land came into their family's possession. The fields were approaching the point at which they would become financially unsustainable to use for agriculture, and as the landowners' farm cottages have also been demolished due to erosion, they have lost the rental income from these. As such, they had to come up with

	an innovative way to adapt to their changing circumstances. They submitted an application to demolish a ruined ex-naval listening station, built of bricks and mortar, and replace this with two movable holiday lets, the 'Watch Houses'. The landowners, with local officer support sought to work with East Suffolk Council to adapt, for the benefit of the community, the environment and the farm. Local officers helped to prepare an Adaptation Statement on behalf of the landowners, which could be submitted to the Council for comment, in advance of a planning application. The holiday lets are steel framed and wood built, designed to be moved with a crane. Everything about them has been designed with this movability in mind, with nothing that can potentially be damaged during movement, such as plaster or tiles. Therefore, this method avoids the costs and dangers associated with demolition of permanent structures, allows the farm to diversify and helps provide a small economic benefit to the areas of Easton Bavents and Southwold. The planning permission contains a condition that ensures any future move of the holiday lets is informed by the latest erosion data. Because Easton Bavents is within the Suffolk Coast Area of Outstanding Natural Beauty, the Watch Houses had to blend with their surroundings, and they also have a low carbon impact.
Lessons Learned:	- Early and iterative consultation with the local planning authority helped to shape the proposals, giving them the best chance of planning approval. - An Adaptation Statement characterised the adaptation need and landowner vision for the future at the site.

APPENDIX 5 – EXAMPLE MODEL CONDITIONS

Temporary Planning Permission

Condition: The use hereby permitted shall be discontinued on or before [].

Reason: Coastal erosion is predicted to affect the site within a period of [] years and to allow the Local Planning Authority the opportunity to reassess the suitability of the use with regard to the progress of cliff erosion.

Condition: The development hereby permitted shall be for a maximum period of [] years from the date of this permission, after which time the structure shall be removed and the land reinstated to its former condition to the satisfaction of the Local Planning Authority.

Reason: Having regard to the non-permanent nature of the structure and predicted shoreline position as a result of ongoing coastal erosion.

Condition: The use hereby permitted shall be carried out only by [] and shall be for a limited period being the period of [] years from the date of this permission, or the period during which the premises are occupied by [] whichever is the shorter.

Reason: Having regard to the special circumstances put forward by the applicant and predicted shoreline position as a result of ongoing cliff erosion.

Condition: On [] the use hereby permitted shall be discontinued and the land shall be reinstated to its former condition to the satisfaction of the Local Planning Authority at or before this date.

Reason: Having regard to the progress of cliff erosion, risks to people associated with falling debris and appearance of the locality.

Surface Water Drainage

Condition: Details of surface water drainage, in connection with the development hereby approved, shall be submitted to, and approved by, the Local Planning Authority before any works on the site commences. The drainage works shall be constructed in accordance with the approved plans.

Reason: To ensure satisfactory drainage of the site and prevent cliff destabilisation.

Relocated Dwellings

Condition: The proposed dwelling shall contain a floor space not exceeding the floor space of the dwelling being replaced ([] square metres).

Reason: To ensure that the new dwelling provides a like-for-like replacement to meet the needs of the current occupants and in accordance with Policy [].

Condition: The proposed dwelling shall contain a floor area not exceeding the floor area of the dwelling being replaced ([] square metres) plus any permitted development allowance (at an allowance permitted on the date that the planning application was submitted) that has not already been used by the original dwelling.

Reason: To ensure that the new dwelling provides a replacement dwelling to meet the needs of the current occupants and in accordance with Policy [].

Condition: Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (Amendment) (No. 2) (England) Order 2008 no building or structure permitted by Classes A (extensions or alterations), B (changes to the roof) or E (buildings or enclosures within the curtilage of the house) of Schedule 2 Part 1 of the Order shall be erected without the submission of a formal planning application and the granting of planning permission by the Local Planning Authority.

Reason: To prevent further increases in the size of replacement dwelling in the countryside and to secure a properly planned development.

Condition: First occupation of the relocated dwelling shall be limited to the person/s displaced from their original property by coastal erosion and shall not be for the benefit of any other person whatsoever.

Reason: The site is in an area where dwellings would not normally be permitted unless special circumstances have been demonstrated which would justify applying the exception policy [].

Change of Use

Condition: The [building/land] shall be used only for [] and for no other purpose whatsoever, (including any other purpose in Class [] of the Schedule to the Town and Country Planning (Use Classes) Order 2005) or in any provision equivalent to that Class in a statutory instrument revoking and re-enacting that Order with or without modification.

Reason: To retain control of the type of development that will be permitted in areas at risk of coastal erosion and enable consideration as to whether other uses in the Use Class would be satisfactory in this area.

APPENDIX 6 – NEIGHBOURHOOD PLAN GUIDANCE

The purpose of this guidance is to support communities seeking to address coastal planning matters within a Neighbourhood Plan. Community groups considering undertaking a neighbourhood plan are encouraged to engage with their local planning authority to discuss planning related issues and potential ways in which a neighbourhood plan could help to resolve such issues. The following sources provide guidance and information about Neighbourhood Planning more broadly:

- National Planning Practice Guidance for Neighbourhood Planning³⁸
- Locality guidance for neighbourhood planning³⁹
- Local Planning Authority guidance (East Suffolk Council⁴⁰, Great Yarmouth Borough Council⁴¹, North Norfolk District Council⁴², and The Broads⁴³)

Neighbourhood plans are important planning documents that local community groups can prepare for their local areas (usually a parish). Neighbourhood plans can address, and write policies concerning a wide range of planning matters important to the community. Once 'made' (adopted), neighbourhood plans become part of the development plan and sit alongside the relevant Local Plan/s, receiving statutory status in the determination of planning applications.

Neighbourhood Plans must:

- Create policies that address the (re)development of land;
- Create policies that would be in general conformity with the strategic policies of the relevant Local Plan;
- Create policies that would be within their neighbourhood area. In the context of coastal planning, the terrestrial and marine planning regimes meet and overlap between the mean low and high water spring tides;

The Local Plans contain strategic planning policies that address coastal planning matters, including relocation and rollback. If considering preparing coastal planning policies, it is important that community groups fully consider and understand the content of such Local Plan policies, avoid duplication and add value to these policies; the relevant Local Authority can advise on this. Within the above framework, Neighbourhood Plans can potentially consider coastal planning matters in a number of ways, including the following:

³⁸ <https://www.gov.uk/guidance/neighbourhood-planning--2>

³⁹ <https://neighbourhoodplanning.org/>

⁴⁰ <https://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/>

⁴¹ <https://www.great-yarmouth.gov.uk/neighbourhood-planning>

⁴² <https://www.north-norfolk.gov.uk/tasks/planning-policy/neighbourhood-planning/>

⁴³ <https://www.broads-authority.gov.uk/planning/planning-policies/neighbourhood-planning>

- Allocate land for (re)development in less vulnerable locations, providing plots to residents and businesses at greatest risk (for guidance on rollback and relocation, see chapter 5 of this SPD). If such plots were developed as self or custom build dwellings, they would benefit from Community Infrastructure Levy (CIL) exemption where applicable, which would support the viability of relocation.
- Allocate land for (re)development in less vulnerable locations to help fund the introduction and maintenance of coastal risk management structures.
- Develop a vision, derived from community engagement, to help identify opportunities for activities on the coast (within the CCMA). The vision could help to identify and support changes of use to uses less vulnerable to coastal change, potentially including both temporary and permanent development opportunities on the coast.

The implementation of coastal planning policies, such as rollback and relocation, can require significant funds, especially where demolition is required.

APPENDIX 7 – GLOSSARY

A

Area of Outstanding Natural Beauty

Land protected by the Countryside and Rights of Way Act 2000 to conserve and enhance its natural beauty.

Article 4 direction

A direction relating to Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 requiring specified development that would ordinarily be permitted development to achieve planning permission.

C

Coastal adaptation

The process of managing the negative impacts of coastal change, in a way that makes individuals, communities or systems better suited to their environment.

Coastal Change Management Area

An area identified in plans (usually the Local Plan) as likely to be affected by physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion.

Coastal erosion

An effect of natural coastal processes whereby material is eroded from cliff/beach.

Coastal processes

Natural coastal processes driven by geology, tides, weather and climate change.

Conservation area

Land protected by the Planning (Listed Buildings and Conservation Areas) Act 1990 to preserve or enhance the character and appearance of its special architectural or historic interest.

Climate change

Changes to the climate as a result of human activities, most commonly associated with the unsustainable burning of fossil fuels.

D

Development plan

The collection of land use documents (e.g. Local Plans, Neighbourhood Plans) that planning applications must be accorded with unless material considerations indicate otherwise.

E

Enabling development

Development contrary to planning policy, but which would secure a particular public benefit/s that

would warrant departing from policy. It usually concerns development that would financially support development which would otherwise be unviable.

Erosion risk areas

Areas identified in a SMP as likely to be at risk from coastal erosion and flooding in the short (0-20 years), medium (20-50 years) and long (50-100 years) term, which form the evidence base for the CCMA.

Exception site

An area of land on which certain types of development (as specified in a land use plan e.g. Local Plan or Neighbourhood Plan) could be granted as an exception to the standard approach to development on such land.

H

Heritage asset

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

Highway authority

An organisation responsible for public roads, as set out in the Highways Act (as amended) 1980.

I

Integrated Coastal Zone Management

A dynamic, multidisciplinary, holistic and iterative process to promote sustainable management of the coast.

L

Local development order

A land use plan prepared by the local planning authority that grants planning permission to development specified in the local development order.

Local plan

A land use plan prepared by the local planning authority containing planning policies against which planning applications are determined.

Local planning authority

The public authority whose duty it is to carry out specific planning functions (e.g. prepare the local plan, determine planning applications) for a particular area.

Listed building

A building identified for its special architectural or historic interest.

M

Marine plan

A plan prepared by a marine plan authority that sets policies for and in connection with the sustainable development of the relevant marine plan area.

N

Neighbourhood development order

A land use plan prepared by a local community group that grants planning permission to development specified in the neighbourhood development order.

Neighbourhood plan

A land use plan prepared by a local community group containing planning policies against which planning applications are determined.

P

Planning history

The collection of historic planning permissions and/or enforcement action on an area of land.

R

Relocation

The relocation of development from a site at risk from coastal change to a site of much lesser risk. Similar to 'relocation'.

Risk management structure

Structures designed to reduce the impact of coastal processes on an area along the coast.

Rollback

The movement of development from a site at risk from coastal change to a site of much lesser risk, usually in relatively close proximity to the previous site. Similar to 'relocation'.

S

Section 106 agreement

A legal agreement requiring specified planning obligations to mitigate the impacts of development, entered into under section 106 of the Town and Country Planning Act 1990.

Shoreline Management Plan (SMP)

A strategy for managing flood and erosion risk for a particular stretch of coast, over short, medium and long-term periods.

Sound

The test set out in the National Planning Policy Framework (NPPF) against which local plans are assessed by Government appointed planning inspectors.

Special Area of Conservation

An area of land designated under the Conservation of Habitat and Species Regulations 2017 (as amended) for its contribution to conserving habitats and species.

Special Protection Area

An area of land designated under the Conservation of Habitats and Species Regulations 2017 (as amended) for its contribution to conserving birds.

Supplementary planning document (SPD)

A document that adds further detail to the policies in the development plan and operates as a material consideration in the determination of planning applications.

T

The Partnership

The group of organisations preparing the draft Coastal Adaptation SPD (East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority, and the shared Coastal Partnership East team).

Consultation Statement

Draft Coastal Adaptation Supplementary Planning Document

October 2022



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Introduction

This draft Coastal Adaptation Supplementary Planning Document (SPD) provides guidance on the coastal adaptation planning policies of the following Local Plans:

- East Suffolk Council
 - Suffolk Coastal Local Plan (2020)
 - Waveney Local Plan (2019)
- Great Yarmouth Borough Council
 - Local Plan Part 1 (2015)
 - Local Plan Part 2 (2021)
- North Norfolk District Council
 - Core Strategy (2008)
- Broads Authority
 - The Broads Local Plan (2019)

Once adopted the Coastal Adaptation SPD will replace the following documents:

- 'Coastal Erosion and Development Control Guidance' (2009) covering North Norfolk District Council, and
- 'Development and Coastal Change SPD' (2013) covering the former Waveney area which now forms part of East Suffolk Council.

The Partnership of local planning authorities and the shared Coastal Partnership East team (the Partnership) has followed the approach to engagement as established in the Statement's of Community Involvement adopted by each authority. At the start of preparation of the SPD the 2014 East Suffolk Council Statements of Community Involvement were in place (covering the former Waveney and Suffolk Coastal districts). East Suffolk Council has since adopted a new Statement of Community Involvement in April 2021 which applies to the consultation on the draft SPD. While preparing the Coastal Adaptation SPD the Partnership has consulted with relevant organisations and members of the public. Details of this consultation process are set out below.

An initial stage of consultation was held for 6 weeks between 4 September and 16 October 2020. The draft consultation on the draft SPD will be held for 6 weeks between 9 January and 20 February 2023.

This Consultation Statement has been produced under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) to accompany the consultation on the draft SPD which is to be held between 9 January and 20 February 2023. After which the Consultation Statement will be amended to take account of responses submitted to the formal consultation prior to adoption.

Who was consulted?

The initial consultation sought to provide interested parties with the opportunity to comment on the proposed broad content of the SPD, as set out in the initial consultation document¹.

All of those registered on the Partnership's respective council planning policy mailing lists were consulted. The initial consultation was also made available on the Partnership's respective council websites, and publicised via social media and a press release in order to achieve as wide a response as possible and give members of the public the opportunity to comment on the proposed broad content of the SPD regardless of whether they had signed up to a council mailing list.

How were they consulted?

The initial consultation documents, over the 6 week initial consultation between 4 September and 16 October 2020, were made available on the East Suffolk Council website (with links to the Est Suffolk Council website from other Partnership websites). The initial consultation document can be viewed here:

<https://eastsuffolk.inconsult.uk/consult.ti/coastaladaptationspd2020/consultationHome>.

The consultation was also advertised via the Partnership's respective social media accounts (see Appendix 1). The initial consultation document, available at the above link, provided background information to the consultation and asked a series of questions. Hard copies of the document were also made available free of charge by post by contacting the Planning Policy and Delivery team as the usual locations for viewing documents were closed to the public, due to the Covid-19 pandemic.

The consultation sought responses to the following questions:

1. Do you consider the scope and proposed content of the Supplementary Planning Document to be appropriate?
2. Are there any elements of National or Local Planning Policy which should be particularly emphasised/explained in the SPD?

¹ <https://eastsuffolk.inconsult.uk/consult.ti/coastaladaptationspd2020/consultationHome>

3. What guidance for development in the Coastal Change Management Area should be identified in the SPD?
4. Are the categories identified in section 3 appropriate and comprehensive or should others be identified?
5. What guidance on temporary development within the CCMA should be included?
6. What elements should be included within a Coastal Erosion Vulnerability assessment?
7. What guidance on Roll-back and relocation options should be included?
8. What guidance on enabling development should be included?
9. What case studies should be used in this SPD to demonstrate coastal adaptation best practice?
10. Do you have any other comments which could help the partnership prepare the SPD?

In total 63 individuals and organisations responded to the consultation. Between them they made 288 comments, as presented in the table in Appendix 3. The consultation responses can also be viewed on the East Suffolk Council website at: [INSERT INOVEM LINK](#)

What were the main issues raised during the initial consultation?

A summary of the main issues raised through the initial consultation is as follows.

1. Do you consider the scope and proposed content of the Supplementary Planning Document to be appropriate?
 - The SPD should change the planning policies concerning the coast as set out in Local Plans.
 - The SPD should change the approach to management of the coast as set out in the Shoreline Management Plans (SMP).
 - The SPD should address flood risk as well as coastal erosion risk.
 - The SPD should recognise the importance of the natural and historic environment along the coast and the benefits these environments provide communities and businesses.
 - The SPD should provide guidance relating to public have access at the coast and countryside.
2. Are there any elements of National or Local Planning Policy which should be particularly emphasised/explained in the SPD?
 - The SPD should explain the difference between terrestrial and marine planning.
 - The SPD should explain the difference between local plan and SMP policy.
 - The SPD should explain the difference between local plan and national policy.
 - The SPD should refer to the Government's national policy statements on various topic areas.
 - The initial consultation document was hard to understand for those that do not already understand coastal planning jargon.

- The SPD should provide guidance helping to explain how coastal planning policies will apply to different types of development.
 - The SPD should recognise the importance of natural and historic environment and that enabling development, and rollback and relocation development must consider the natural and historic environment, and avoid impacts on such environments.
 - Guidance should be provided on the implementation of flood risk policies.
3. What guidance for development in the Coastal Change Management Area should be identified in the SPD?
 - The SPD should protect buildings and other assets on the coast from being lost to the sea.
 4. Are the categories identified in section 3 appropriate and comprehensive or should others be identified?
 - The SPD should provide guidance relating to the various risk zones added to the CCMA.
 5. What guidance on temporary development within the CCMA should be included?
 - Some suggested temporary development shouldn't be allowed, and others suggested temporary development should form part of a sustainable approach to development on the coast.
 - Some confusion about what would constitute temporary development.
 6. What elements should be included within a Coastal Erosion Vulnerability assessment?
 - There was some confusion as to the role of Coastal Erosion Vulnerability Assessments.
 7. What guidance on Roll-back and relocation options should be included?
 - The SPD should provide information concerning funding sources and compensation for rollback and relocation development.
 - The SPD should provide guidance on the nuances of planning applications for rollback and relocation to ensure policy compliant planning applications are submitted.
 8. What guidance on enabling development should be included?
 - A number of local, national and international coastal adaptation best practice case studies were suggested to be explored.
 9. What case studies should be used in this SPD to demonstrate coastal adaptation best practice?
 - A number of case studies were suggested ranging from locally specific coastal adaptation schemes (such Wood Hill, East Runton rollback and relocation of holiday park lodges), to local schemes for wildlife conservation and habitat creation, large scale energy projects, to coastal adaptation approaches of other nations.
 10. Do you have any other comments which could help the partnership prepare the SPD?
 - The open ended nature of this question resulted a large number of comments covering a large variety of topics and issues, most of which cannot be addressed by the SPD.

Appendix 1: Initial consultation social media posts



Appendix 2: Consultation bodies

The following organisations and groups were consulted at the start of the initial consultation.

Specific consultation bodies

- Environment Agency
- Historic England
- Marine Management Organisation
- Natural England
- Network Rail
- National Highways (at the time Highways England)
- Norfolk County Council
- Suffolk County Council
- Parish and town councils within East Suffolk, Great Yarmouth, North Norfolk, and The Broads (within the aforementioned local authorities) and neighbouring parishes
- Neighbouring Local Planning Authorities
- Elected members
- Anglian Water
- Water Management Alliance
- Essex and Suffolk Water
- Homes England
- NHS England
- Ipswich and East Suffolk Clinical Commissioning Group
- North Norfolk Clinical Commissioning Group
- Great Yarmouth and Waveney Clinical Commissioning Group

General consultation bodies

- Voluntary bodies some or all of whose activities benefit any part of the SPD area
- Bodies which represent the interests of different racial, ethnic or national groups in the SPD area
- Bodies which represent the interests of different religious groups in the SPD area
- Bodies which represent the interests of disabled persons in the SPD area
- Bodies which represent the interests of persons carrying on business in the SPD area

Other individuals and organisations

Includes local businesses, high schools, individuals, local organisations and groups, planning agents, developers, landowners, residents and others on the combined mailing list.

Appendix 3: Initial consultation responses

The table below lists the consultation responses to the initial consultation (4 September – 16 October 2020), alongside the Partnership response and changes made to the SPD.

1. Do you consider the scope and proposed content of the Supplementary Planning Document to be appropriate?

Respondent	Comment	Partnership Response	Changes Made
Stu Precious	It says virtually nothing using multiple pages.	The initial consultation gave respondents the opportunity to influence the broad content of the SPD. After taking account of consultation responses the Partnership Authorities will prepare and then consult on the draft SPD, which will contain the full detail.	No change.
Lindsay Frost	Integrated Coastal Zone Management needs to include physical geography processes, such as sediment cells, onshore land use and activities and offshore uses and activities.	Guidance relating to planning policy implications for land uses and activities affecting the coast will be included within the SPD. This SPD, however, cannot directly address offshore uses and processes as these lie outside the terrestrial planning realm. The document also cannot duplicate or replace the remit and contents of Shoreline Management Plans, but will have appropriate regard to them.	No change.
Richard Starling	One should not have to register or log in to participate in a consultation. This will deter many people from participating.	Comment noted. There was also the opportunity to email and or post responses to the Partnership.	No change.
Martlesham Sea Wall Group (Thomas O'Brien)	See below	Comment noted. Regard has been had to the comments made under other questions.	No change.
Norman Castleton	Pleased to see that the Broads Authority has be included in this although quite frankly I can see little reason for another document concerning the subject of managing the coast. The problem seems to me to be plenty of paperwork but little practical effort. Plenty of retreat with	The SPD cannot alter the approach to the management of the coast, as this is the role of Shoreline Management Plans (SMPs). The aim of the SPD is to provide guidance to assist in the	No change.

Respondent	Comment	Partnership Response	Changes Made
	very little of it managed. I would suggest a more clear interaction with SMP. For example will there be a closer examination of the need to defend parts of the coast where the SMP says nothing should be done. Will the resources be available to manage the coastline properly or is the intention just to let everything go?	application of Local Plan policies regarding coastal adaptation.	
Norfolk County Council - Natural Environment Team (Catherine Dew)	We support the Coastal Adaptation Supplementary Planning Document and have the following comments for consideration. The SPD seems to focus on the human impacts. It should also include the 'natural environment' – the habitats and species which form the coastal (and marine) environment as the management measures and policies will impact on them and the ecosystem services and recreational use, they provide. They are inextricably linked.	Support welcomed. The SPD will seek to provide guidance on the implementation of coastal planning policies. The SPD will set out the affects that coastal processes and policies can have on coastal ecology (and vice versa), and identify ways in which such impacts can be lessened and ways in which coastal adaptation can best serve the needs of the natural environment.	The SPD emphasises the impacts of coastal processes and planning policies on the natural environment, and provides guidance on ways in which such impacts can be lessened through coastal adaptation.
Blue Sky Leisure (Paul Timewell)	BSL consider the scope and broad of the document to be broadly appropriate. The document should identify the range of business operating along the coast and acknowledge their significant importance to the North Norfolk and wider Norfolk economy, particularly tourism. It should explain that all businesses are different , both in type and size, and the SPD should not treat all business as the same, with certain business such as tourism having very different needs in terms of how planning policy should be applied. The SPD provides the opportunity to introduce some flexibility into the application of Planning Policy dependent on the nature of activity affected. For instance, in terms of the application of the roll back policy, the site requirements for a caravan and camping site are vastly different to a manufacturing business. The SPD should explain the material considerations that could be	The SPD will within its context chapter, set out the affects that coastal processes and policies can have on local businesses, and it is recognised, as stated, that there are a wide variety of different businesses operating on or close to the coast. The SPD cannot introduce ways of interpreting policy, that is the role of the development plan. The SPD will, however, provide guidance on how policy should be applied and some flexibility may be appropriate in certain cases The SPD will present case studies of coastal adaptation best practice. It is not considered	The SPD sets out the benefits of roll back schemes against the impacts. Appropriate pre-application engagement should be undertaken, but the Local Plans already mention this

Respondent	Comment	Partnership Response	Changes Made
	considered as being appropriate to justify a variation in planning policies dealing with coastal adaptation. It could for example, explain the 'trade offs' that may be acceptable when considering the benefits of roll back schemes against the impacts. The SPD could usefully provide advice on the expectations for public engagement where roll back schemes are proposed. The SPD could usefully include case studies of schemes that are considered exemplars of a successful implementation of coastal adaptation planning policies. The SPD should set out the likely planning response in cases of emergency, for instance where unpredicted/accelerated coastal erosion means businesses have to make rapid reactive decisions as to how best to deal with such circumstances.	necessary to include details of emergency cases: these will always be dealt with in a case-by-case basis	
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	The LLFA have reviewed the Draft SPD Initial consultation document scope and consider the scope and content are appropriate.	Support welcomed.	No change.
Felixstowe Town Council (Ash Tadjrishi)	We agree with the content topic proposed, but believe the wider public would be well served by a section overtly specific to Sea Level Rise, and what an appropriate level may be relevant to be taken into account over a 100 year time scale. We note the figure currently used by the Environment Agency as general guidance is of the order of 0.7m over 100 years.	National Planning Practice Guidance for 'Flood risk assessments: climate change allowances' provides guidance relating to sea level rise, amongst other things. As national guidance can be updated quickly, it is considered more appropriate for sea level rise to be addressed by national guidance and the Environment Agency rather than this SPD.	No change.
J E Blanchflower	Broadly speaking yes, but the SPD will need to be flexible enough to respond to climate change initiatives, many of which have not been devised or enacted. Perhaps the scope should be widened to encompass this.	Coastal change is inherently linked to climate change, and the SPD will seek to provide case study examples of coastal adaptation best practice.	No change.

Respondent	Comment	Partnership Response	Changes Made
Andrew McDonald	I am not sure if this is not a statement of the obvious, but perhaps the definition of context in para 1 could be expanded from 'Homes, businesses and communities' to include the environment and biodiversity of the CCMA? Action taken by way or rollback and especially by relocation will inherently offer a threat to areas hosting the relocation, and this should be explicit from the outset. I suggest also that the significance of climate change is not sufficiently reflected in the decision to make coastal change 'inclusive' of climate change, and no doubt the detailed document will address this.	The SPD will within its context chapter, set out the affects that coastal processes and policies can have on the natural environment. It is recognised that coastal change is inherently linked to and affected by climate change, and the SPD will seek to provide case study examples of coastal adaptation best practice.	The SPD sets out the impacts of coastal processes and planning policies on the natural environment.
Burnham Overy Parish Council (Sarah Raven)	This has been sent to Burnham Overy Parish Council for recommendations however it only covers half the coastline. Why is this only suitable for this part of the coast from Holkham to Felixstowe?	The SPD covers the coastal areas of North Norfolk District Council, Great Yarmouth Borough Council, The Broads Authority, and East Suffolk Council (the area that the Coastal Partnership East team covers) – but not King's Lynn and West Norfolk, which has its own arrangements. Adjoining parish councils to the SPD area have also been consulted, however, as is standard practice.	No change.
Peter Terrington	More emphasis needed on development in areas of accretion.	The SPD will provide guidance in relation to development within and affecting the CCMA, including areas of accretion, erosion and where the shoreline is reasonably stable.	No change.
Peter Terrington		N/A	N/A
Southwold Town Council (Lesley Beevor)	Scope: section 2 should summarize current mitigation policies, especially in context of those areas where policy is hold-the-line as at Southwold.	The SPD will include a summary of the powers bestowed on coastal authorities and our partners (such as the Environment Agency) as well as policies to manage the coast, including mitigation policies.	No change.
Anglian Water Services Ltd (Stewart Patience)	Consideration should also be given to existing infrastructure located within the area covered by the SPD as follows: • water and water recycling infrastructure	The SPD will provide guidance relating to the implementation of coastal planning policies, which will be relevant to existing and planned infrastructure at the coast.	No change.

Respondent	Comment	Partnership Response	Changes Made
	provided by Anglian Water and • existing infrastructure including ports within the area and energy generation		
Barton Willmore (Will Spencer)	NFOWF Ltd supports the objectives for producing the SPD, as identified in Section 1 of the Consultation Document. This includes helping coastal communities to prosper and to adapt to coastal change, but to also provide detailed guidance on the interpretation of policies with a whole coast approach. Our client also welcomes and agrees with the statement that the SPD will not: • Create new or amend existing planning policies as this is the role of the Development Plan and National Policy, or • Alter the approach to the management of the coast as this is the role of SMPs. Notwithstanding the above, Section 4 of the Consultation Document states that the SPD will “provide clear guidance as to what development may be appropriate in such areas and in what circumstances”. NFOWF Ltd urges the exercise of caution in the way this statement is interpreted into the draft SPD. There is a risk that an overly restrictive policy will conflict with both of the above objectives and could result in certain development being excluded from certain areas without sufficient evidence to demonstrate that that it would be inappropriate. This should not be the role of planning policy, but rather it should be for developers to make applications for development in an area and for these to include assessments of the impacts on coastal processes and to justify why the proposal is suitable in the area (with regard to proposed mitigation and monitoring measures). To do otherwise could threaten the delivery of developments such as the Project as well as the achievement of national and local policies for increasing the supply of renewable sources of energy and addressing	Support noted. The SPD does not wish to restrict appropriate development at the coast. However, certain development types will normally be inappropriate within the CCMA and this will be set out within the SPD. The policies for determining planning applications will be those of the Local Plan, and any planning application must be treated on its own merits, but the SPD will provide useful advice on how the Local Plan policies will be applied.	No change.

Respondent	Comment	Partnership Response	Changes Made
	the impacts of climate change. Should the SPD identify the types of development suitable in certain areas (as in the Waveney Development and Coastal Change SPD 2013) then it should state that renewable energy infrastructure should be supported where there is a proposed management plan to address potential impacts on coastal processes.		
Bidwells (Kate Hammond)	Looking at the 5 points of the SPD, we believe it covers most areas of Coastal change, however, we would like to see more emphasis on traffic management and road infrastructure which is not specifically mentioned with in the summaries. This is vital especially between Sidestrand and Mundesley where coastal erosion is accelerating and will have a huge impact on the existing road infrastructure.	The SPD will provide guidance relating to the implementation of coastal planning policies, which will be relevant to existing and planned infrastructure at the coast, including highways.	No change.
RSPB (Ian Robinson)	Nature conservation interests are frequently combined with built development under the general heading of 'development'. In order to provide clarity, we suggest where management for interests other than built environment exist, they are categorised and treated separately. This would therefore result in targeted discussions about predicted coastal change impacts on e.g. biodiversity, water and soils as discrete features that could be affected separate from residential properties and commercial and industrial interests. The impacts of each topic area may have similarities but there will also be variation. This would also then lend itself to additional assessments that will need to be undertaken to demonstrate that the proposed SPD will not adversely affect the integrity of terrestrial and marine Natura 2000 sites, as well as other national important sites. This will also enable reference to specific guidance within the	The SPD will within its context chapter, set out the affects that coastal processes and policies can have on the natural environment. The terminology used within the SPD will categorise the built environment and natural environment separately so as not to underplay the important role of the natural environment and the ways in which it is affected by changes to the coast, whether they be natural or built.	The SPD sets out the impacts of coastal processes and planning policies on the natural environment.

Respondent	Comment	Partnership Response	Changes Made
	National Planning Policy Framework (NPPF) e.g. paras 118, 157. The mitigation hierarchy for developments needs to be clearly set out, emphasising the mitigation and compensation requirements that should be considered. Any mitigation and compensation packages must be based on the ecological requirements for the species and habitats affected and may need to consider options for compensation some distance from the point of impact to ensure the most sustainable options are identified. The SPD must also highlight the opportunities for net gain for biodiversity and the environment to be a consideration in coastal adaptation projects. The role that adaptive coastal management plays in maintaining functional coastal habitats needs to be highlighted and the benefits of these habitats for wildlife conservation, flood prevention and in the context of saltmarsh, carbon sequestration. Providing carbon budgets for each proposed option would enable an assessment of sustainability to be made. Proposals should be developed describing creation of compensatory habitat along the coast in response to losses elsewhere. For example, coastal squeeze in the Deben estuary is resulting in unfavourable SSSI condition due to loss of saltmarsh. In areas where managed realignment/no active intervention is the accepted course in the Shoreline Management Plan, this saltmarsh could potentially be restored in a different location, preventing net loss of habitats and potential for overall net gain.		

2. Are there any elements of National or Local Planning Policy which should be particularly emphasised/explained in the SPD?

Respondent	Comment	Partnership Response	Changes Made
esc (beavan)	building in flood plains	The SPD will focus on coastal planning policies, and although flooding can be a coastal issue, the policies governing flood risk are not solely coastal matters. This SPD will therefore not address policies concerned solely with flood risk, other than where they may affect coastal management and adaptation policies.	No change.
Stu Precious	It's a cop out to just cite existing documents and not summarise the existing policy.	The initial consultation gave respondents the opportunity to influence the proposed content of the SPD. After taking account of consultation responses the Partnership Authorities will draft and consult on the draft SPD.	No change.
Paul Johnson	There is a general feel that the Policy recognises that change is inevitable, and that it is not taken very seriously. The scope appears to be reactive rather than proactive and could be read, as I did, to be investigative, research worthy and able to produce conclusions that have sadly, no teeth. I see little in the document that suggests it will achieve very much - I hope I am wrong and missed something innovative and supportive to those who are closely linked to the coastal strip, both business and leisure.	This SPD will ensure planning guidance is up to date, aid the interpretation and delivery of planning policy, and provide case study examples of coastal adaptation best practice. The SPD cannot create new or amend existing planning policies as this is the role of the Development Plan and national policy.	No change.
Jeffrey Hallett	Long term effects of building Sizewell C and similar future developments. Impact of the many (7) planned offshore energy projects that need infrastructure to come onshore and then have depots, works or power transfer cables etc passing through your countryside with no inter-agency cooperation to mitigate the cumulative effects.	The impacts of specific infrastructure projects will not be discussed, other than where they relate to case studies of coastal adaptation best practice. The SPD will, however, provide guidance relating to implementation of coastal adaptation planning policies.	No change.
Margaret Hallett	The likely long-term effect of the Energy companies planning developments.	The impacts of specific infrastructure projects will not be discussed, other than where they relate to case studies of coastal adaptation best practice. The SPD will, however, provide guidance relating to	No change.

Respondent	Comment	Partnership Response	Changes Made
		implementation of coastal adaptation planning policies.	
North Norfolk District Council (Harry Blathwayt)	Roll Back or managed retreat must be emphasised regarding compensation.	Financial “compensation” is not available in roll-back or managed realignment scenarios, but the possibility of any forms of “compensation” (which might perhaps include the right to a plot of land inland in some cases) will be discussed in the SPD.	No change
Tessa Aston	The continued protection of Landguard Fort, Landguard Common and Cobbold's Point and the Martello Tower at Manor End.	The SPD cannot alter the approach to the management of the coast as this is the role of SMPs.	No change.
Lindsay Frost	Laws governing the littoral zone and offshore areas	The SPD will set out, briefly, the powers bestowed upon coastal authorities and our partners that can be used to manage the coast. The SPD is based upon the principles of Integrated Coastal Zone Management and as such the Partnership Authorities will explore the potential inclusion of laws governing the marine planning system within the SPD.	No change.
Richard Starling	Before doing this consultation, you should await the outcome of the Broadland Futures Initiative. We have very little information on National yet alone Local Planning Policy at this stage and the BFI consultation would have, hopefully, explained this.	This SPD and the Broadland Futures Initiative (BFI) operate within the same topic area, that of coastal change. However, the SPD is very much focussed on providing guidance relating to the implementation of existing planning policies, whereas the BFI is looking to inform the overarching flood risk management strategy for the next 100 years over a much wider area. The SPD and BFI can complement each other, and the SPD need not be restricted by the timings of the BFI.	No change.
Martlesham Sea Wall Group (Thomas O'Brien)	I would like more emphasis on the value of the coast to local communities and tourists for enjoyment. Rather than the public seen as purely a 'disturbance'. See my comments in 10 below.	The SPD will set out the importance of the coast to communities, businesses, and the environment.	No change.
Norman Castleton	I would like to see how this SPD extends or clarifies the criteria and definitions already agreed in the SMPs.	The SPD will provide a glossary of terms but cannot amend definitions set out in the SMPs.	The SPD will contain a glossary of key terms.

Respondent	Comment	Partnership Response	Changes Made
Norfolk County Council - Natural Environment Team (Catherine Dew)	The SPD should incorporate the forthcoming Nature Recovery Networks and consideration should be given to re-creating habitats and enabling habitat and species migrations.	The SPD will, set out the affects that coastal processes and policies can have on the natural environment, and also provide guidance relating to habitat creation and enhancement in the context of rollback and relocation approach to coastal adaptation.	No change.
Blue Sky Leisure (Paul Timewell)	An important part of the SPD should be to provide more detailed guidance on the necessary nuances of the implementation of Local Plan roll back policies and explain how policies will be applied to different type of businesses. As explained above, what might be an appropriate approach to dealing with the relocation of a tourism business will be different to the approach for manufacturing, particularly in terms of site requirements, location, and attractiveness to visitors. The SPD could explain the expectations for options appraisal, in terms of application of the roll back policies and acknowledge that different business will need a differing site requirement. The SPD should provide guidance and advice on timing/phasing expectations for the implementation of coastal adaptation policies, acknowledging that it may only be viable and practical to implement policies over an extended time period.	The SPD will provide guidance relating to the implementation of rollback and relocation policies, and include guidance relating to different uses. While it will be important for the SPD to provide as much useful guidance as possible, it will also be important to balance this with the need to provide concise guidance and allow for flexibility in demonstrably unique circumstances.	No change.
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	a. The National Policy Statement on Flood Risk and Coastal Change Management should be included within this section as it is expected to strongly influence the policy direction over the coming years. b. Please confirm whether this section will make links to appropriate flood risk policy whether the coastal erosion lead to a change in flood risk?	The SPD will include the National Policy Statement for Flood and Coastal Erosion Risk Management when setting out the policy framework relating to coastal adaptation. The SPD will focus on providing guidance relating to the implementation of coastal planning policies, and will therefore not provide much guidance relating to flood risk.	No change.

Respondent	Comment	Partnership Response	Changes Made
Felixstowe Town Council (Ash Tadjrishi)	The governance of Coastal Management, let alone with the inclusion of Adaptation, is complex and very hard for lay people to understand. We believe a section should be included explaining the core principles – as clearly and briefly as possible. E.g. Coastal Management, and as part of that Coastal Adaptation, have emerged as concepts over the past 15 years or so, replacing previous separate approaches for “Flood Protection” in respect of areas liable to tidal flooding and separately “Coast Protection” – protecting higher coastal land from loss by erosion. Land use planning had traditionally been a separate topic. Four strands of law and regulation cover those issues, with Responsible authorities being: • Flood protection: The Environment Agency (EA) • Coast Protection: District & Unitary LAs, as Coast Protection Authorities (CPAs), under the 1949 Coast Protection Act • Planning; District & Unitary LAs, as Local Planning Authorities (LPAs). • Marine ecology and management (the MMO) Within the Planning section, reference should be made to: • The relevant NPPF sections, particularly paragraph 160(b) – “Developments should be safe for their lifetime.” (our perception of some recent planning applications has been that too much reliance has been given to the sequential test in isolation, without the over-riding “safe” factor of 160(b) • Shoreline Management Plans and their role as a non-statutory evidence base, including the meaning, with examples, of the 3 policy options. Links to relevant documents: NPPF, SMP, role of Estuary and other flood plans.	The SPD will include information relating to the legislative and policy framework for coastal management, as well as a glossary of terms to help explain some of the planning and coastal management jargon often used.	The SPD will contain a glossary of key terms.
J E Blanchflower	Preservation of fragile and diminishing coastal habitats such as salt marshes by strengthening Local Planning Policy to prevent damaging development of any kind (public and private) or activities (e.g. dredging) in areas which are vulnerable or nationally designated. Emphasising the	The SPD cannot create or amend planning policy, or provide guidance relating to policy wholly in the marine realm. The guidance contained in the SPD will, we hope, ensure that applications are supported	No change.

Respondent	Comment	Partnership Response	Changes Made
	importance of up to date guidance from expert bodies on the long term effects of proposed changes/developments. Planning applications can take a long time between submission, consideration and approval and the coastline may have changed in the interim period, given the acceleration of climate change and extreme weather patterns.	by robust evidence and have been prepared in a manner that can then be more speedily determined.	
Lowestoft Cruising Club (David Bennett)	Not able to comment on the National Planning policies, as not familiar with them. All local East Suffolk Council relevant planning policies should be emphasised and explained.	The SPD will provide guidance relating to the implementation of coastal adaptation policies.	No change.
Andrew McDonald	The recently extended Suffolk Coasts and Heaths AONB, and the very wide range of protected and designated landscape in East Suffolk, are critical to the life of Suffolk communities, and it would be helpful if the recognition of the importance of Heritage Coasts and AONBs in paras 170-173 of the NPPF is reflected in the SPD, as should be the underlying regulation in the Countryside and Rights Of Way Act 2000. It would also be helpful to note the emphasis on long term planning in the Coastal Management section of the recently adopted Local Plan, especially para 9.39.	The SPD will within its context chapter, set out the affects that coastal processes and policies can have on the natural environment. The long term approach to coastal management, as mentioned within paragraph 9.39 of the Suffolk Coastal Local Plan, will be emphasised within the SPD.	No change.
Peter Terrington	NN: EN 7 & 8	It is assumed the comment relates to policies of the North Norfolk Core Strategy. The SPD will provide guidance relating to the implementation of coastal adaptation policies contained in the North Norfolk Core Strategy, as well as other Development Plan documents across the SPD area.	No change.
SCEG - Scratby and California Environment Group (Lodge)	Adaption options.	The SPD will provide guidance relating to the implementation of coastal adaptation policies.	No change.

Respondent	Comment	Partnership Response	Changes Made
Southwold Town Council (Lesley Beevor)	No Comment.	N/A	N/A
Water Management Alliance (Jessica Nobbs)	Paragraph 163 from NPPF allowing development in areas that meet the required criteria with regards to flood risk – push for sustainable development (even though coastal focused). Strong links also need to be made to the tidal estuarine systems critical to catchment scale long term spatial planning. Water Framework Directive, Habitats Directive duties to the environment.	The SPD will focus primarily on guidance relating to the implementation of coastal adaptation policies. However, guidance relating to other policy frameworks may be included where appropriate.	No change.
Deben Estuary Partnership (Christine Block)	The SDP, as set out, omits any reference to a significant element of the Suffolk coastline – the estuaries of the Deben, Alde and Ore and Blythe. Factors influencing change within an estuary cannot be separated or isolated from coastal systems. In acknowledging, as the draft SPD states, that coastal change can be (but is not limited to) erosion, land slip, permanent inundation, or accretion it follows that it is necessary to accept that estuaries (where rates of change, taking account of climate change, may be significant over the next 100 years), are likely to be affected by most, if not all, of the physical changes listed. With particular reference to the Deben Estuary – here both the estuary mouth, influenced by the variable configuration of coastal shingle banks, and the management of defences within the lower reaches of the estuary will be affected by storm surges, damage to and breaching of defence walls and extensive flooding. In order to deliver a coherent, holistic approach to coastal and estuarine management it is therefore necessary to include estuaries within the coastal change management area policy – as set out in the NPPF-Policy, as set out in the National Planning Policy Framework, requires the delineation of the Coastal Change Management Area to be informed by, amongst many other	The SPD cannot alter the approach to the management of the coast as this is the role of SMPs, and neither can the SPD create new or amend existing planning policies as this is the role of the Development Plan and National Policy. However, the SPD will provide guidance relating to the implementation of coastal adaptation planning policies.	No change.

Respondent	Comment	Partnership Response	Changes Made
	things, Estuary Plans. It is the intention of the Council to expand the boundary and principles of Coastal Change Management Areas to the estuaries of the plan area in order to fully address coastal change along the Suffolk coastline which, by law, extends to the mean low water mark in the estuaries.		
Anglian Water Services Ltd (Stewart Patience)	This section should also refer to powers available to adapt the coast, either in line with the Shoreline Management Plan (SMP) or through any subsequent reviews of the SMP to enable additional growth.	The SPD will set out the powers bestowed upon coastal authorities and our partners that can be used to manage the coast, including through the preparation and review of Shoreline Management Plans.	No change.
Barton Willmore (Will Spencer)	The SPD should acknowledge the Overarching National Policy Statement (NPS) for Energy (EN-1) and the NPS for Renewable Energy (EN-3), in terms of the support given to the need for renewable energy infrastructure, including offshore wind. NPS EN-1 states for example: "The UK needs all the types of energy infrastructure covered by this NPS in order to achieve energy security at the same time as dramatically reducing greenhouse gas emissions. It is for industry to propose new energy infrastructure projects within the strategic framework set by Government. The Government does not consider it appropriate for planning policy to set targets for or limits on different technologies. The IPC [now the Secretary of State] should therefore assess all applications for development consent for the types of infrastructure covered by the energy NPSs on the basis that the Government has demonstrated that there is a need for those types of infrastructure and that the scale and urgency of that need is as described for each of them in this Part..." As noted above (under The Project) the policies in the relevant NPS are the principal considerations in the decision-making process for DCO applications, which could mean departures from other policy is justified in certain	The SPD will provide guidance relating to the implementation of coastal adaptation planning policies. The SPD will not provide guidance relating to the implementation of National Policy Statements, as these relate to the Development Consent Order (DCO) procedure and not to planning applications for which the Local Planning Authority is the determining body.	No change.

Respondent	Comment	Partnership Response	Changes Made
	circumstances. This includes in respect of 'Enabling Development' to deliver certain public benefits which is addressed in more detail in the response to Question 8 below.		
Bidwells (Kate Hammond)	As commented above we consider that road re-alignment and traffic management should be properly considered within this document. Existing businesses rely on the existing highway network and therefore this should be properly considered and protected. We consider there should be more emphasis on other development options where land and property are lost or at risk of being lost in the future.	The SPD will provide guidance relating to the implementation of coastal adaptation planning policies. The SPD will not create new or amend existing planning policies as this is the role of the Development Plan and National Policy.	No change.
RSPB (Ian Robinson)	The Statement of Common Ground Shared Aims states: • A holistic and “whole coast” approach will be taken; this recognises coastal change is an inevitable part of a dynamic coast. A naturally functioning coastline is desirable in principle but may not be appropriate in every location. • To protect the coastal environment, including nature conservation designations and biodiversity. In Waveney Development and Coastal Change SPD (which is to be replaced by this new SPD): • Although not always possible to replace habitat lost as a result of coastal erosion, the Local Planning Authority will endeavour to protect sites from development that could provide opportunities to recreate habitat close to existing sites. The NPPF makes mention in para 166 of the need for Integrated Coastal Zone management. Within the relevant Shoreline Management Plan's (SMPs) (5, 6 and 7) the style and presentation of information for options is very different making it difficult to assess the connectivity between SMP plans and areas. For example, the importance of longshore drift resulting from cliff erosion. How far the impact of this movement of minerals extends isn't explained and as such how important	The SPD will set out the affects that coastal processes and policies can have on the natural environment, and also to provide guidance relating to habitat creation and/or enhancement in relation to rollback and relocation coastal adaptation implementation. The SPD will not alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs).	The SPD will set out the importance of the natural environment and the impacts of coastal processes and planning policies on the natural environment.

Respondent	Comment	Partnership Response	Changes Made
	adopting an option say in SMP 6 is to SMP 7 isn't immediately obvious. Equally, NPPF para 157 and para 163 describe the need to ensure flood risk doesn't get shifted to another location. This is an important consideration given the dynamic nature of this stretch of coast and needs to be appropriately captured in the SPD.		
The British Horse Society (Charlotte Ditchburn)	Yes	Comment noted.	No change.

3. What guidance for development in the Coastal Change Management Area should be identified in the SPD?

Respondent	Comment	Partnership Response	Changes Made
Stu Precious	This exercise seems to be a box ticking exercise. You have not given any clear information and have deliberately obfuscated, to put people off. This is a very serious issue concerning many livelihoods and also SSSI/RAMSAR biodiversity areas, and you make no attempt to explain the current position.	The initial consultation gave respondents the opportunity to influence the content of the SPD. After taking account of consultation responses the Partnership Authorities will consult on the Draft SPD.	No change.
Paul Johnson	The document lacks a context, and can be read in different ways. After reading it I feel I know very little more than I knew before reading it. I don't know how to answer this question.	This initial consultation gave respondents the opportunity to influence the content of the SPD. After taking account of consultation responses the Partnership Authorities will prepare and then consult on the Draft SPD.	No change.
Jeffrey Hallett	See 2 above.	The impacts of specific infrastructure projects will not be discussed, other than where they relate to case	No change.

Respondent	Comment	Partnership Response	Changes Made
		studies of coastal adaptation best practice. The SPD will, however, provide guidance relating to implementation of coastal adaptation planning policies.	
Margaret Hallett	Increased cooperation between companies to ensure the current ad-hoc planning situation where for example Sizewell C and on-shore parts of the wind turbines industry do not appear to be working together to reduce their impact the coast.	The impacts of specific infrastructure projects will not be discussed, other than where they relate to case studies of coastal adaptation best practice. The SPD will, however, provide guidance relating to implementation of coastal adaptation planning policies and will encourage co-operation between different landowners/developers etc.	No change.
North Norfolk District Council (Harry Blathwayt)	All new development in an area likely to affected by Roll Back should not be able to claim compensation due to flooding or erosion. A realistic valuation of agricultural land not just financially but also its strategic worth to the country.	The partnership authorities will consider whether it is appropriate for the SPD to provide guidance relating to compensation, noting that compensation is not specifically referred to in our planning policies.	Consider providing guidance on compensation and financial assistance relating to roll back or relocation schemes.
Tessa Aston	That the coastline for Felixstowe be maintained as needed with particular reference to those areas of historical, ecological or biological areas. It is essential to protect these areas which also bring people to the town thus supporting local business.	The SPD will not alter the approach to the management of the coast as this is the role of SMPs.	No change.

Respondent	Comment	Partnership Response	Changes Made
Lindsay Frost	All guidance should focus on allowing natural processes to find a natural balance, and any human use of the coastal zone should not take place if it is at risk from storm surges or coastal erosion.	Comment noted.	No change.
Richard Starling	Guidance should be to wait until the Broadland Futures Initiative consultation has been completed.	This SPD and the Broadland Futures Initiative (BFI) operate within the same topic area, that of coastal change. However, the SPD is very much focussed on providing guidance relating to the implementation of planning policies, whereas the BFI is looking to inform the overarching flood risk management strategy for the next 100 years over a much wider area. The SPD and BFI can complement each other, and the SPD need not be restricted by the timings of the BFI.	No change.
Norman Castleton	Convincing argument as to why one part of coastline should be defended and others not. If the term managed retreat is used - what is precisely meant by managed. By this I mean arguments other than economic criteria as defined by population density areas. Clear definitions and actions regarding holding the line and even extending the line.	The SPD will not alter the approach to the management of the coast as this is the role of SMPs. The SPD will provide a glossary of terms.	Introduce a glossary of terms into the SPD.
Norfolk County Council - Natural Environment Team	Lighting should be considered within the SPD– nocturnal lighting impacts biodiversity and human health and should be avoided in the first instance, and minimised if not. Consideration should be given to the retention of dark corridors from coastal terrestrial habitats to marine habitats to minimise species fragmentation.	The SPD will not create new or amend existing planning policies as this is the role of the Development Plan and National Policy. However, the SPD will provide guidance on	No change.

Respondent	Comment	Partnership Response	Changes Made
(Catherine Dew)		biodiversity and the natural environment where relevant to the implementation of coastal planning policies.	
Blue Sky Leisure (Paul Timewell)	The SPD should include a specific section dealing with the caravan and camping parks. These are an important resource along the coast and contribute significantly to the availability of holiday accommodation and consequently greatly impact upon the local economy. This is especially the case in East Anglia where the availability of alternative holiday accommodation along the coast is limited. They operate differently from other businesses, often focused on a seasonal basis and have different needs and requirements. There are also operational differences between different types of park, for instances those with fleet caravans (short term lets) compared with owner licensed caravans (holiday homes); some parks will have a mix. The ability to move caravans and pitches subject to owner licenses is different to fleet caravans. It may be necessary and appropriate for Caravan and Camping sites to relocate development within the same erosion zone/risk epoch (further away from imminent danger) for a period of time, whilst other roll back/relocation options are explored and brought forward.	The SPD will include guidance relating to the implementation of coastal planning policies, including roll back and relocation and there is clear merit in addressing caravan and camping parks as part of this, which are (as stated) significant feature of the local economy. At least one case study should cover this issue and there may be value in considering a number of kinds of development separately.	Ensure that appropriate consideration is given to caravan and camping parks
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	a. Please include clear guidance on the expectations relating to the need for Flood Risk Emergency Plans (https://www.adeptnet.org.uk/system/files/documents/ADEPT%20%26%20EA%20Flood%20risk%20emergency%20plans%20for%20new%20development%20September%202019....pdf) and the level of detail expected. In line with the direction of the Flood Risk and Coastal Erosion Policy Statement (2020), it could be prudent for guidance to be provided on requesting the applicant to outline their personal and business contingency plans for the short and medium term in relation to flood risk and coastal change Emergency Plans.	The SPD will not create new or amend existing planning policies as this is the role of the Development Plan and National Policy.	No change.
Felixstowe Town Council (Ash Tadjirishi)	The SPD should outline all relevant guidance, not only from Planning documents but also from the EA, LLFAs, MMO, NE, AONB in order to assist applicants and planning officers to consider all cohesively. Reference should be made to the Coastal Concordat.	The SPD will provide guidance relating to the implementation of coastal planning policies, and to other guidance where relevant to the	No change.

Respondent	Comment	Partnership Response	Changes Made
		implementation of coastal planning policies.	
J E Blanchflower	Whilst I agree with the wording in Section 3 of the consultation document, the importance of allowing for climate change should be mentioned.	The SPD realises that coastal change is inherently linked to climate change, and will seek to provide case study examples of coastal adaptation best practice.	No change.
Lowestoft Cruising Club (David Bennett)	Seems to be fully covered in the Coastal Adaptation Supplementary Planning Document Initial Consultation, Section 4 Proposed Content of the SPD.	Support noted.	No change.
N/A (Caroline Spinks)	Predictions of risks and longevity of development projects based on modelling of coastal change.	The SPD will provide guidance relating to the implementation of Coastal Erosion Vulnerability Assessments (CEVA).	No change.
Andrew McDonald	No comment	N/A	N/A
Peter Terrington	Only essential development should be allowed in the coastal fringe. All other development should be encouraged to consider inland locations. Importance of Coastal Concordant for developments which overlap marine and terrestrial environments.	The SPD will provide guidance relating to the implementation of coastal planning policies, but cannot change these Local Plan policies.	No change.
SCEG - Scratby and California Environment Group (Lodge)	Need to clarify any replacement strategy. What future development will be allowed? What type of new dwellings will be allowed in the 100 year plan. Within the CCMA ie will kit houses allowed.	The SPD will provide guidance relating to the implementation of coastal planning policies but cannot change these Local Plan policies	No change.
Southwold Town Council	May need to reconsider guidance in area of north Southwold and south Reydon, depending on whether mitigation policies are in place.	The SPD will provide guidance relating to the	No change.

Respondent	Comment	Partnership Response	Changes Made
(Lesley Beevor)		implementation of coastal planning policies, which apply to all areas	
Water Management Alliance (Jessica Nobbs)	The Internal Drainage Boards of the Broads (2006) and East Suffolk specifically would want to be consulted on any potential developments (including both permanent and temporary) within their Internal Drainage District by the relevant Local Planning Authorities. The Board believe this to be important as enabling development may impact on areas where important infrastructure such as Board Adopted Watercourses and Pumping Stations etc are cited. The Board may also have an interest in development that would be subject to its Byelaws (namely Byelaw 10 and Byelaw 3). The Board look to promote sustainable development within the IDD whilst taking into consideration elements such as environmental duties and ecological wellbeing, therefore having sight of potential developments that would impact on our IDD is important. CCMA should cover whole tidal flood risk zones to ensure catchment scale long term special planning to prevent inappropriate development now that will increase the cost of later enforced adaption from forecast sea level rise.	The Councils will ensure that the IDBs are being consulted on relevant applications The SPD will provide guidance in relation to which, and when, organisations should be consulted on development proposals under consideration by coastal planning policies. The SPD cannot not alter the CCMA as this is the role of Local Plans and SMPs.	Provide guidance relating to which, and when, organisations should be consulted on development proposals under consideration by coastal planning policies.
Deben Estuary Partnership (Christine Block)	No Comment	N/A	N/A
Anglian Water Services Ltd (Stewart Patience)	The focus appears to new development proposals and public realm infrastructure only. As set above there is a need to consider the existing infrastructure managed by Anglian Water as well any future investment in the area to serve our customers.	The SPD will provide guidance relating to the provision of infrastructure within and adjacent to the CCMA.	No change
Barton Willmore (Will Spencer)	No Comment	N/A	N/A
Bidwells (Kate Hammond)	All proposed new development ideas should be consulted and worked in partnership with local planning authorities. Guidance should be prepared using two-way communication between local authorities and other stakeholders to prevent any unnecessary extra cost on pre-application plans.	The Partnership Authorities will consult on the Draft SPD, when prepared. In relation to potential planning	No change.

Respondent	Comment	Partnership Response	Changes Made
		applications, the pre-application charging process is available and recommended	
RSPB (Ian Robinson)	There needs to be clarity on the boundaries of the CCMA to understand how this relates to the wider SMP area, including the stretch of coast to Holkham, within the SPD. Documentation indicates the CCMA relates to Trimley Marshes and no other specific sites within the zone being considered, however the greatest rate of annual loss of land centres around the Benacre area. Any changes must be sustainable and demonstrate that any impacts on the environment will be avoided or minimised.	The CCMA is identified and mapped in the Suffolk Coastal, Waveney, and Great Yarmouth Stage 1 and emerging Stage 2 Local Plans Policies Maps. The CCMA (labelled the Coastal Erosion Constraint Area) for North Norfolk is identified on the North Norfolk Local Plan proposals map. The SPD cannot alter the CCMA as this is the role of Local Plans and SMPs.	No change.
The British Horse Society (Charlotte Ditchburn)	Guidance for development in the Coastal Change Management Area should include guidance regarding access, including the BHS leaflet for developers and planners enclosed with this letter. A document such as the 'Equestrians in Hampshire – a reference guide for Transport, Planners, Developers and other decision makers' mentioned below should be developed for each county and used for Norfolk and Suffolk. At very minimum developers should be aware of their duties regarding 'Public Rights of Way affected by coastal and estuarine change or management' provided by Suffolk County Council at: https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/rights-and-responsibilities/public-rights-of-way-affected-by-coastal-and-estuarine-change-or-management/ .	Comment noted. The SPD will set out the powers bestowed upon coastal authorities and our partners that can be used to manage the coast, and coastal management policies and guidance established in Local Plans and national policy.	No change.

4. Are the categories identified in section 3 appropriate and comprehensive or should others be identified?

Respondent	Comment	Partnership Response	Changes Made
Stu Precious	Tell people the proposals not just the methodology of the consultation.	The initial consultation gave respondents the opportunity to influence the content of the SPD. After	No change.

Respondent	Comment	Partnership Response	Changes Made
		taking account of consultation responses the Partnership Authorities will prepare and consult on the Draft SPD.	
Paul Johnson	This is confusing - section 3 does not identify any categories, however section 4 does and they appear appropriate.	Support noted. The question should have referred to section 4.3.	No change.
Jeffrey Hallett	Need to define what is meant by the "eastern half" of the coastal coastal authorities. Does this include Pettistree?	The SPD will not be relevant to Pettistree as it only relates to the immediate coastal area	No change.
Margaret Hallett	The width of the "coastal band" is not sufficiently defined. Is it allied to height above sea level or settlements?	The initial consultation document does not refer to a "coastal band", but the SPD will cover the areas at potential risk of being affected by coastal erosion within the next 100 years.	No change.
North Norfolk District Council (Harry Blathwayt)	I think they are wide ranging enough to cover the bases.	Support noted.	No change.
Tessa Aston	How to maintain the beach should the water level rise. Is there sufficient protection in place for the houses and proposed businesses at Manor End. Contingency plan should the sea breach the wall, to what extent have the tides been affected since last review. Has the 100 year erosion plan stayed true or have matters accelerated.	The SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs).	No change.
Lindsay Frost	Not sure which 'section 3' is meant here? If it is the a, b, c bit then also d Offshore development e Vulnerability to storm surge flooding	Offshore development will be a matter for the marine planning regime to deal with and therefore guidance on marine development cannot be provided within the SPD. The primary focus of the SPD is providing guidance relating to the implementation of coastal adaptation planning policies, rather than flood risk planning policies.	No change
Richard Starling	We do not know as we have not had sufficient information yet.	Comment noted – more details will be included in the draft SPD	No change.
Norman Castleton	Sites of special geographic. historical, heritage, scientific, natural & geological interest.	The categories identified in section 4.3 relate to types of development within the CCMA, as well as guidance relating to Coastal Erosion Vulnerability Assessments.	No change.

Respondent	Comment	Partnership Response	Changes Made
		The SPD will provide specific guidance relating to geological or heritage sites, but will touch on these areas where relevant to the implementation of the coastal planning policies.	
Blue Sky Leisure (Paul Timewell)	The SPD should acknowledge that some development will be seasonal and may require a different approach to the application of planning policy. For instance, works associated with Caravan and Camping parks may be best implemented 'out of season' to minimise economic impacts, which may affect time limits on decision notices. There should also be recognition of viability issues associated with roll back implementation, arising from the removal and relocation of services as well as caravans. This is a costly process, particularly if it results in loss of income while the roll back is taking place.	Comment noted. The SPD will provide guidance relating to roll back and relocation options and camping and caravan sites will be subject to consideration, given their significance to the local economy.	No change.
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	a. Most likely, although it would be helpful to see a breakdown of the contents for these section in order to provide any meaningful feedback.	Comment noted. When prepared the draft SPD will be consulted on, providing interested parties with the opportunity to comment on the detail of the SPD.	No change.
Felixstowe Town Council (Ash Tadjrishi)	The CCMA headings are appropriate. However, the LP rightly allows for Erosion Vulnerability Assessments to be required in certain locations in HTL areas. That should be explained, with examples. Other similar issues, e.g. the 30m Access Zones should be explained, whether in this section or perhaps better in a section dedicated to adaptation in HTL areas.	Comment noted. Guidance related to Coastal Erosion Vulnerability Assessments shall be explored, as with the application of such assessments in HTL areas.	Provide guidance related to the implementation of Policy SCLP9.3 with regard to the 30m zone landward of the CCMA.
J E Blanchflower	Add 'd. Respect for nationally designated areas such as AONBs, SSSIs, National Nature Reserves which should not be developed or subjected to damaging intervention'	The categories identified in section 4.3 relate to types of development within the CCMA, as well as guidance relating to Coastal Erosion Vulnerability Assessments. The SPD will not provide guidance relating to nature conservation or environmental designations, other than where relevant to the implementation of the coastal	No change.

Respondent	Comment	Partnership Response	Changes Made
		planning policies. Other Local Plan and NPPF policies cover development potentially affecting nationally designated areas.	
Lowestoft Cruising Club (David Bennett)	Not sure if this question refers to 3. Links to Shoreline Management Plans (SMPs), or 4.3 Development in the Coastal Change Management Area.	Comment noted. The question should have referred to section 4.3.	No change.
Andrew McDonald	Yes, although '...development which could have adverse impacts on coastal erosion, coastal processes and vulnerability elsewhere...' could be expanded upon - is the 'vulnerability' strictly limited to coastal change?	Comment noted. The SPD will provide guidance relating to the implementation of coastal planning policies. Vulnerability, as referenced in the initial consultation document is referring to coastal erosion and coastal processes.	No change.
Peter Terrington	Yes but more emphasis need on the impacts of development in areas of accretion. See 10 below.	The identification of the CCMA extent takes account of coastal accretion. The SPD will provide guidance relating to development within the CCMA.	
SCEG - Scratby and California Environment Group (Lodge)	Clarification of use of land within the CCMA Commercial usage.	Commercial development will be covered under 'permanent and temporary development on the Coast'.	No change.
Southwold Town Council (Lesley Beever)	Ok	Comment noted.	N/A
Water Management Alliance (Jessica Nobbs)	Development should have regard and ideally positively identify future role back for the freshwater environment requirements also. The natural landscape has huge economic and wellbeing value but is taken for granted currently. Given the long lead in times to create high biodiversity potential advanced build programmes would also be desirable. Bio-diversity offsetting payments through the planning process	The SPD will within its context chapter, set out the affects that coastal processes and policies can have on the natural environment. However, the guidance provided will primarily focus on the implementation of the coastal planning policies (i.e. development-related).	No change.
Deben Estuary Partnership (Christine Block)	No Comment	N/A	N/A

Respondent	Comment	Partnership Response	Changes Made
Anglian Water Services Ltd (Stewart Patience)	This section should highlight that any roll-back options need to be agreed in collaboration with the asset owners and be realistic about timescales for moving/changing any significant infrastructure. Should you have any queries relating to this response please let me know.	Comment noted. The SPD will highlight the need for collaboration with land and asset owners in discussing roll back and relocation options.	Highlight the need for collaboration with asset owners in agreeing roll back and relocation options.
Barton Willmore (Will Spencer)	No Comment	N/A	N/A
Bidwells (Kate Hammond)	We believe compensation opportunities should be identified, especially for land managers/owners where livelihoods are affected by coastal erosion and where roll back or new development is not feasible. We also believe that enabling development opportunities should be considered within the document, such as where agricultural land or property is lost or at risk of being lost in the short term other development options may be considered more favourably to enable businesses to diversify and continue / remain economically viable. This will maintain existing employment and potentially create future employment opportunities.	Financial compensation for loss of land due to erosion is not something currently allowable and the SPD cannot alter that. The SPD will provide guidance relating to enabling development and the councils take a flexible approach but cannot create new policy.	No change.
RSPB (Ian Robinson)	We presume this question refers to the categories set out in Section 4, not section 3 as described in the initial consultation guidance document? As described in our comments to question 1, the RSPB advocates differentiating between development for the purposes of nature conservation to maintain (and indeed improve) conditions for biodiversity, and separately covering development for other purposes e.g. built environment. This will help in judging and clarifying proposals when using guidance from NPPF para 157 (sequential and exception tests)	The SPD will within its context chapter, set out the affects that coastal processes and policies can have on the natural environment. The terminology used within the SPD will categorise the built environment and natural environment separately so as not to underplay the important role of the natural environment and the ways in which it is affected by changes to the coast, whether they be natural or built.	Emphasise the impacts of coastal processes and planning policies on the natural environment (and vice versa). Use terminology carefully and avoid using 'development' to refer to the built and natural environments.
The British Horse Society (Charlotte Ditchburn)	The 3 categories are appropriate.	Support noted.	No change.

5. What guidance on temporary development within the Coastal Change Management Area should be included?

Respondent	Comment	Partnership Response	Changes Made
Stu Precious	What proposed measures are currently in place and what is proposed to improve on that. This is just rubbish.	The initial consultation gave respondents the opportunity to influence the content of the SPD. After taking account of consultation responses the Partnership Authorities will write and consult on the Draft SPD.	No change.
Paul Johnson	Section 3 subsection 3 is beyond the scope of the typical non-expert reader to answer.	The initial consultation document was written in a manner that used plain English as much as possible, however some questions inevitably have to cover more complicated and technical grounds than others.	No change.
unite the union (Robert Riley)	fishing	While the SPD will pursue Integrated Coastal Zone Management to ensure effective alignment of the terrestrial and marine planning regimes, the SPD cannot provide guidance relating to policies set out in Marine Plans.	No change.
Jeffrey Hallett	"Temporary" needs to be defined. The 10 to 12 year construction time of Sizewell C is not temporary. For many it will be the rest of a lifetime!	The SPD will provide guidance relating to temporary development, including the time limits that should be applied to such development. The Sizewell C application has been approved under the national infrastructure regime. Whilst the construction will be temporary, the buildings themselves will be permanent, of course	No change.
Margaret Hallett	What is "temporary" ? For example the negative effect of the 'temporary' (project 12 year) development of Sizewell C on the local community in terms of property value, tourist blight etc. will be life-changing for many locals.	The SPD will provide guidance relating to temporary development, including the time limits that could/should be applied to such development (which will be variable, depending on a range of circumstances).	No change.
North Norfolk District Council (Harry Blathwayt)	I would like a. To include Temporary Holiday Sites as an important issue as the previous 28 day allowance has increased to 56 days. As I have a massive site in an AONB in my ward I am very aware of the implications impacting all aspects of coastal life. Human and all forms of wild life and sand dune erosion.	Guidance in respect of criterion a. (of section 4.3 of the initial consultation document) will relate to temporary holiday sites. The 56-day allowance has now been returned to 28 days post-Covid	No change.

Respondent	Comment	Partnership Response	Changes Made
Tessa Aston	A regular review of the tides, climate change and how this will affect the shoreline and beach.	The SPD will not alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs). Coastal Erosion Vulnerability Assessments (CEVA) will be required in support of certain planning applications for development within the CCMA.	No change.
Lindsay Frost	Any temporary developments should not interfere with natural processes and should not be placed in areas at risk from storm surge flooding or coastal erosion.	Comment noted; however, some temporary developments can be appropriate in areas at risk from erosion and/or flooding. These are obviously very fact- and location-specific. The SPD will provide guidance on this matter	No change.
Richard Starling	Inform people that we have too many organisations making recommendations so best wait until things have been sorted with the BFI consultation.	This SPD and the Broadland Futures Initiative (BFI) operate within the same topic area, that of coastal change. However, the SPD is very much focussed on providing guidance relating to the implementation of planning policies, whereas the BFI is looking to inform the overarching flood risk management strategy for the next 100 years over a much wider area. The SPD and BFI can complement each other, and the SPD need not be restricted by the timings of the BFI.	No change.
Norman Castleton	No more caravan sites, no more static accommodation sites and as little development of any nature on the coastline as possible.	Comment noted, but Local Plan policies allow some (appropriate) new development/re-development in the coastal zone, although most forms of permanent new development (such as housing) are unlikely to be granted consent	No change.
Blue Sky Leisure (Paul Timewell)	The SPD should acknowledge that some temporary development may be necessary within the CCMA as part of a wider roll back proposal, to ensure continuity and viability of affected businesses. There may therefore be a need for temporary development in the high-risk zone to facilitate a successful roll back process.	This may be correct and the SPD will explore this point in more detail	No change.
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	a. A definition of what is considered to be temporary development in relation to the CCMA. We need to see a definition before identifying what guidance we would recommend. In addition, would temporary works/development include site compounds / material storage area / haul roads etc? If so some form of FRA and	The SPD will provide a definition for temporary development and this could include site compounds etc (if relevant)	No change.

Respondent	Comment	Partnership Response	Changes Made
	temporary drainage strategy would need to be considered. The same LLFA guidance as for permanent developments would apply.		
Felixstowe Town Council (Ash Tadjrishi)	No comment	N/A	N/A
J E Blanchflower	Legally enforceable time limits, consideration of disturbance to the status quo, impact on the landscape, vulnerability in fragile areas, access routes.	The SPD will provide guidance relating to the implementation of Local Plan coastal planning policies, including in relation to time limits.	No change.
Lowestoft Cruising Club (David Bennett)	Only essential temporary developments should be included, e.g. temporary flood and erosion prevention measures.	Comment noted. The SPD will provide guidance relating to what development might be appropriate within the CCMA and in what circumstances but cannot replace or update Local Plan policy which covers this matter.	No change.
N/A (Caroline Spinks)	Predictions of risks based on modelling of coastal change.	Comment noted – the extent of the Coastal Change Management Areas are assessed in the production of Shoreline Management Plans (SMPs)	No change.
Andrew McDonald	No comment	N/A	N/A
Peter Terrington	Applications should be considered against impacts on the environment.	Planning applications are considered against impacts arising from the proposed development on the environment, amongst other things.	No change.
SCEG - Scratby and California Environment Group (Lodge)	What sort of structure would be allowed for this? ie kit houses, caravan sites or commercial enterprises.	The SPD will provide clear guidance as to what development may be appropriate in such areas and in what circumstances, building on the relevant Local Plan policies.	No change.
Southwold Town Council (Lesley Beevor)	No Comment	N/A	N/A
Water Management Alliance (Jessica Nobbs)	Duration of temporary development and its location. What effects development may have on infrastructure that the Board have an interest in and how these temporary works will be implemented and removed pre and post development. Widest sense should encourage green build low construction footprint	The SPD will provide guidance relating to time limits and the implementation and removal of temporary development.	No change.

Respondent	Comment	Partnership Response	Changes Made
Deben Estuary Partnership (Christine Block)	No Comment	N/A	N/A
Anglian Water Services Ltd (Stewart Patience)	No Comment	N/A	N/A
Barton Willmore (Will Spencer)	No Comment	N/A	N/A
Bidwells (Kate Hammond)	We believe approximate scientific time scales should be considered as part of the document and these should be reviewed as part of the development of this document.	The SPD will provide guidance relating to time limits of development, but the latest scientific evidence on sea-level rise, climate change etc and implications for planning and environmental policy is produced by Defra, DHLUC and the Environment Agency; the SPD therefore cannot alter these parameters	No change.
RSPB (Ian Robinson)	As described above in our comments related to Q3 the CCMA needs to be defined accurately. Any temporary development should only be considered as part of the staging process to move from the existing position/defended lines to a future one. Equally the approach as defined in NPPF para 171 is critical in applying an assessment based on the hierarchy of designations and ‘taking a strategic approach to maintaining and enhancing networks of habitats and green infrastructure, and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.’ Adopting a universally accepted approach across all 3 SMP areas is essential. For example, SMP 5 and 6 take account of internationally protected sites and species – ‘considered pertinent legislation.’ SMP 7 only takes account of Annex 1 habitats, where there are extensive areas of internationally important freshwater habitats within this SMP zone.	The SPD will not alter the CCMA as this is the role of Local Plans and SMPs. The SPD will also not alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs). The SPD will provide guidance relating to the implementation of coastal planning policies.	No change.

Respondent	Comment	Partnership Response	Changes Made
The British Horse Society (Charlotte Ditchburn)	The same guidance should be provided for temporary development as that for permanent development in the Coastal Change Management Area.	Comment noted.	No change.

6. What elements should be included within a Coastal Erosion Vulnerability Assessment (CEVA)?

Respondent	Comment	Partnership Response	Make Changes
esc (beavan)	height above sea level, geology, likelihood of funding for defences	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
Stu Precious	Property assessments Biodiversity assessments. Erosion Timescale assessments. Best practice audits. Hold the line v managed retreat. Budgetary impact assessments. Economic impact assessments. Long term Impact assessments.	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
unite the union (Robert Riley)	none	N/A	N/A
Jeffrey Hallett	Short and long term effects and the impact on both everyday life and tourism.	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
Margaret Hallett	The effect on people's every-day existence and longer term well-being	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
North Norfolk District Council (Harry Blathwayt)	Sand dredging at sea, particularly in the Yare alluvial basin off Great Yarmouth. I can not find definitive research on the impact on beaches to the north of this activity.	While the SPD will pursue Integrated Coastal Zone Management to ensure effective alignment of the terrestrial and marine planning regimes, the SPD cannot provide guidance relating to policies set out in Marine Plans or proposals governed under the marine planning regime,	No change.

Respondent	Comment	Partnership Response	Make Changes
		unless such proposals overlap with the terrestrial planning regime. A report on Hemsby coastal erosion produced by consultants Jacobs for Great Yarmouth Borough Council in 2018 may be of interest but to summarise, there is little or no evidence that modern offshore dredging has any effect on beach levels.	
Tessa Aston	Whether the 100 year erosion line is still valid; is there need for further groynes; are the groynes in the best place still and is there a need to adjust their height in view of recent tide levels; with recent developments is the flood protection still appropriate for the area; what is the likely impact on geological and biological features and how has this changed	The SPD cannot create or amend policies concerning the future protection of specific stretches of coast as this is the role of the Shoreline Management Plan.	No change.
Lindsay Frost	Historic and predicted rates of erosion. Isostatic adjustment rates. Sea level rise rates. Potential loss of human life. Potential financial losses. Cost-benefit analyses of current flood and erosion defences. Wider impact of current coastal erosion and flood defences.	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
Richard Starling	A promise not to levy any fees or charges or indeed make a Coastal Erosion Vulnerability assessment compulsory for planning applicants. We have enough hoops to jump through now without more pointless assessments.	Coastal Erosion Vulnerability Assessments are required for certain development types within specified areas, as adopted through Local Plans. The SPD cannot alter the need to prepare CEVAs, but instead seeks to provide guidance in order to aid applicants in the preparation of CEVAs.	No change.
Norman Castleton	Economically important, naturally important, special scientifically important	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
Blue Sky Leisure (Paul Timewell)	The SPD should explain the role of Coastal Erosion Vulnerability Assessments, the circumstances in which they may be applicable to outweigh the shore line management plan, the weight that can be attributed to them in the consideration of development proposals, their	The SPD provides guidance relating to the role of Coastal Erosion vulnerability Assessments, the circumstances in which they may be required, the consideration and level of detail required in their preparation. The weight that can be attributed to a Coastal Erosion Vulnerability Assessment	No change.

Respondent	Comment	Partnership Response	Make Changes
	expected content and technical work needed to underpin them and any expectations/requirements for Council and public engagement.	would be a matter for the decision maker, and cannot be prescribed in the SPD.	
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	a. Description of the existing site and current day site conditions; b. Description of the proposed development; c. Description of the existing and future coastal erosion risk (including the impacts of climate change; d. Assessment of the current and future rate of erosion; e. An estimation of when the development is likely to be directly and indirectly compromised by coastal erosion and how this is likely to occur; f. Consideration of the potential change of flood risk posed due to coastal change; g. Consideration of the risk management measures that would be in place for the short, medium and long term scenarios; h. Description of what the applicants personal/business contingency plans for the short, medium and long term in relation to coastal change. i. An emergency plan for developments directly on the coastline.	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
Felixstowe Town Council (Ash Tadjrishi)	The local geology, and erosion history, should be required to be investigated, with appropriate evidence bases.	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
J E Blanchflower	The effects of climate change and extreme weather patterns, whether erosion is compensated by deposition in another part of the coastline, allowing natural processes to take place rather than attempting to resist change with expensive and often unsightly defences.	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
Lowestoft Cruising Club (David Bennett)	Predicted global sea level rises and adverse weather events as a result of the climate emergency. Effect of unregulated use of upper Blythe estuary by speedboats, jet skis causing erosion, loss of habitat for nesting birds at certain times of year, disruption of emerging seal colony'	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
Andrew McDonald	No comment	N/A	N/A
Peter Terrington	Cost benefit analysis.	Consideration has been given to whether the proposed factor should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.

Respondent	Comment	Partnership Response	Make Changes
SCEG - Scratby and California Environment Group (Lodge)	Time scale The demographics of the community Options for assessment of vulnerability	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
Southwold Town Council (Lesley Beevor)	No Comment	N/A	N/A
Water Management Alliance (Jessica Nobbs)	No comments	N/A	N/A
Deben Estuary Partnership (Christine Block)	The Planning Practice Guidance provides the following advice on what a Coastal Change Vulnerability Assessment would need to demonstrate: “In considering the requirements of the National Planning Policy Framework a vulnerability assessment might demonstrate that the development: would not impair the ability of communities and the natural environment to adapt sustainably to the impacts of a changing climate; will be safe through its planned lifetime, without increasing risk to life or property, or requiring new or improved coastal defences; would not affect the natural balance and stability of the coastline or exacerbate the rate of shoreline change to the extent that changes to the coastline are increased nearby or elsewhere.	The SPD will be consistent with national policy and guidance.	No change.
Anglian Water Services Ltd (Stewart Patience)	No Comment	N/A	N/A
Barton Willmore (Will Spencer)	No Comment	N/A	N/A
Bidwells (Kate Hammond)	The elements that is causing the erosion whether it is surface drainage, underground springs, increasing sea levels, poor or unmanaged defences.	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.

Respondent	Comment	Partnership Response	Make Changes
RSPB (Ian Robinson)	There should be a section in the proposed content on 'Working together to ensure a coherent network of designated coastal habitats is maintained through adaptive coastal management on a dynamic coastline.' The approach presented within SMP 6 should be applied to SMP 5 and SMP 7. This clearly sets out predicted lines where the coast will be in the three epochs. Vulnerability will presumably change over time as erosion occurs and so an iterative approach will need to be adopted and options reviewed. Conflict will exist in valuation of property versus land versus legal status. Irrespective early planning must take place with opportunity mapping to define where housing and transport infrastructure will need to be placed, where freshwater habitats will need to be recreated, where non-designated land will need to be (if deemed appropriate and feasible) recreated well in advance of permanent change. A piecemeal approach will not be appropriate and must be based on a community, a business/facility, a discreet area of land.	Comment noted. However, the SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs).	No change.

7. What guidance on Roll-back and relocation options should be included?

Respondent	Comment	Partnership Response	Changes Made
esc (beavan)	need more resilience planning	Comment noted; resilience is an important consideration	No change.
Stu Precious	Timescales, Compulsary purchase Process help and guidance, Help to sell/dispose of assets, Avoidance of negative equity assistance. Alternative options to roll back. If the Dutch can do it why can't we. Investment in effective anti erosion strategies. Case Study, Hopton Beach. Accurate Bathymetric and Longshore Drift surveys. Roll back and relocation sounds like you're giving up.	Comment noted. The SPD cannot create new or amend existing planning policies as this is the role of the Development Plan and National Policy and SMPs determine the management of the coast.	No change.
Janet Huckle	I refer here to Pakefield Lighthouse active 1886-1906. Although not a functioning Trinity House lighthouse it serves an important purpose. It is run and maintained by Pakefield Coast Watch which is a growing number of Coastal Surveillance Stations manned by volunteer men and women, located	The SPD will provide guidance relating to rollback and relocation options that could be applied to land and development across the SPD area.	No change.

Respondent	Comment	Partnership Response	Changes Made
	around the coast of mainland Britain. All stations carry out the same task, which is to assist Her Majesty's Coast Guard in their task of helping people in trouble, on or near the sea. HM Coastguard recognises the worth of coastal surveillance stations and many, including ours at Pakefield, hold "Declared Facility Status" which means that they are recognised as contributing to the safety of life by operating a coastal station. Pakefield Coastwatch is responsible to HM Coastguard and operates from approximately Lowestoft Harbour to the village of Kessingland, and as far out to sea as visibility allows. Pakefield Coastwatch is a charity registered with the Charity Commission for England and Wales. I think that what Pakefield Coastwatch does is very important and should be taken into consideration when Roll-back and relocation options are discussed, taking note of its contributions to the safety of people on or near the sea. It is also part of the history of this coastline and should be preserved.		
Jeffrey Hallett	Insistence on proper public planning consent and not imposition by a Secretary of State.	The SPD cannot alter the decision-making procedure, as this is the role of planning legislation.	No change.
Margaret Hallett	to insist on Effective planning control by the local authority not over-ruled for so-called National importance issues	The SPD cannot alter the decision-making procedure, as this is the role of planning legislation. Nationally Significant Infrastructure Projects follow a separate planning process, with the final determination on these made by the relevant Secretary of State.	No change.
North Norfolk District Council (Harry Blathwayt)	This is dependant the scale of any Roll Back or managed retreat. Again this is likely to impact my ward as it includes Horsey, Waxham, Sea Palling, Hickling, and Potter Heigham. As any examination of the map will show the ward is almost entirely coastal and river flood plain 3. Large areas are dependant on Coastal and Broads National Park economy. What measures will be put in place to protect the more substantial settlements What wild life mitigation will be required in turning the area to salt wet lands from the present fresh water and marsh areas. The need of infrastructure to reduce salt incursion to the whole of the Broads Northern River System.	The SPD will not alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs).	No change.
Tessa Aston	Is there an existing plan should the need to relocate residents or structures of national importance due to climate change/higher tides.	The management of different sections of the coastline is set out in the Shoreline Management Plans (SMPs).	No change.

Respondent	Comment	Partnership Response	Changes Made
		The SPD will not alter the approach to the management of the coast as this is the role of SMPs.	
Lindsay Frost	See the Pathfinder Pilot Project feedback from Happisburgh (North Norfolk) (see the excellent(!) chapter on coasts (pp 116-169) in Edexcel AS/A level Geography Book 1 published by Pearson).	The Partnership led on the Happisburgh project and so is well aware of it and it will feature as a case study in the SPD	No change.
Richard Starling	Await outcome of the Broadland Futures Initiative before we know in detail about relevant options.	This SPD and the Broadland Futures Initiative (BFI) operate within the same topic area, that of coastal change. However, the SPD is very much focussed on providing guidance relating to the implementation of planning policies, whereas the BFI is looking to inform the overarching flood risk management strategy for the next 100 years over a much wider area. The SPD and BFI can complement each other, and the SPD need not be restricted by the timings of the BFI.	No change.
Norman Castleton	Roll back should be a last resort and not as an excuse not to spend any money. The full consequence of roll back should be assessed e.g. the effects on the hinterlands including the marchlands of Broadland.	Rollback is part of the suite of options available to manage the coastline but any decision on rollback will primarily be made through the SMPs and Local Plans. All implications are carefully considered and the SPD will provide guidance on rollback	No change.
Blue Sky Leisure (Paul Timewell)	The SPD should acknowledge that the application of the roll-back and relocation policy will be different for different types of business, and the site-specific opportunities and requirements will vary. The scope of the options appraisal should be set out and include advice on expectations for areas of search. The SPD should provide guidance on instances where the potential relocation site is a distance away from the 'at risk' site, including potentially in a different district. The SPD should provide advice on the potential for relaxation of normal' planning policy that could apply to a site or area if it provides an appropriate opportunity for a relocation site away from the 'at risk' zone. The SPD should provide guidance on the weight that can be given to the benefits of relocating development from an 'at risk' zone to offset against the impacts of development to the safer site.	The SPD will provide guidance relating to the implementation of rollback and relocation planning policies and it is recognised that different approaches will be necessary for different situations The SPD will also provide advice relating to enabling development but the weight to be given to the benefits of a relocation can only be assessed on a case-by-case basis	No change.
Norfolk County	a. The timescale guidance; b. Planning permission requirements; c. Funding streams that may be available to support. d. How roll back / relocation will be	Comment noted. The Partnership will consider whether to provide guidance relating to details of potential	Detail potential

Respondent	Comment	Partnership Response	Changes Made
Council - Lead Local Flood Authority (Sarah Luff)	considered in terms of planning consideration and whether there will be any variations from normal planning application submission?	funding streams available to rollback and relocation proposals.	funding streams available to rollback and relocation proposals.
Felixstowe Town Council (Ash Tadjrishi)	No comment – this is not currently relevant to Felixstowe - long may that remain so.	N/A	N/A
J E Blanchflower	I don't understand the jargon, therefore I cannot answer this question.	Comment noted. A glossary will be included in the SPD.	No change.
Lowestoft Cruising Club (David Bennett)	While a cost benefit analysis is appropriate, there may be other factors to consider, e.g. preserving historic sites and buildings, looking longer term at the impacts of the climate emergency.	Preservation of historic sites and buildings will be an important consideration in relevant situations	No change.
N/A (Caroline Spinks)	Impact assessments should be made on areas deemed suitable for relocation.	Any potential relocation areas will need to be assessed carefully and the SPD will provide guidance	No change.
Andrew McDonald	Again, the statement envisages 'the movement of assets currently or soon to be at risk from coastal change to less vulnerable locations...' and it would be helpful to extend the definition of 'vulnerable' to include the inherent vulnerabilities of the relocation site as well as the underlying vulnerability due to coastal change.	The SPD will provide a glossary of terms. In general terms, the relocation site will need to be safe from coastal erosion.	No change
Peter Terrington	cost benefit analysis and investigation of sources of funding for inducements to homes and businesses to relocate inland	Comment noted. Decisions on rollback are rarely straightforward	Detail potential funding streams available to rollback and relocation proposals.

Respondent	Comment	Partnership Response	Changes Made
SCEG - Scratby and California Environment Group (Lodge)	Identifying land or sites appropriate for future roll-back use. As much detail as possible to guide the local authorities on what can be done. At what stage to allow action on policy	The SPD cannot identify land for development, for future rollback or relocation, as this is the role of the Development Plan but will provide guidance on rollback	No change.
Southwold Town Council (Lesley Beevor)	No Comment	N/A	N/A
Water Management Alliance (Jessica Nobbs)	Relocation options should consider if locations are to be within or near to one of the Internal Drainage Boards and associated infrastructure. Re-location may require adhering to the Boards Byelaws depending on the scope of development. Ideally an agreed catchment scale spatial plan should identify preferred “roll to” long term sustainable locations. Guidance should be fit a single property through to whole communities.	Comment noted. The SPD cannot identify land for development, for future rollback or relocation, as this is the role of the Development Plan. The SPD can however provide guidance relating to actions that should be taken by landowners or applicants if land is within or near to one of the Internal Drainage Boards and associated infrastructure.	Provide guidance relating to actions that should be taken by landowners or applicants if land is within or near to one of the Internal Drainage Boards and associated infrastructure.
Deben Estuary Partnership (Christine Block)	No Comment	N/A	N/A
Anglian Water Services Ltd	No Comment	N/A	N/A

Respondent	Comment	Partnership Response	Changes Made
(Stewart Patience)			
Barton Willmore (Will Spencer)	No Comment	N/A	N/A
Bidwells (Kate Hammond)	Authorities and stakeholders to work in partnership to assess the needs of the opportunities available. We believe there should be a sensible look at areas for relocation/rollback and a more sympathetic planning partnership with local Parishes to allow businesses/Individuals to progress with bringing prosperity into their specific area. As stated above we also believe that enabling development opportunities should be considered within the document, such as where agricultural land is lost other development options may be considered more favourably to enable businesses to diversify and continue / remain economically viable. Enabling development can be included to cover the additional costs of replacing assets which are lost. This will maintain existing employment and potentially create future employment opportunities.	Comment noted. The SPD cannot identify land for development, for future rollback or relocation, as this is the role of the Development Plan. The SPD will provide guidance relating to enabling development, but again cannot create or modify existing policy.	No change.
RSPB (Ian Robinson)	Comments mentioned in response to question 6 are also relevant. Compensation and other costs should be factored in. Within SMP's 5 and 7 significant areas of low-lying coastal habitat fall within Flood Zone 2, suggesting change within Epoch's 1 and 2. SMP 5 shows maps of adaptive measures i.e. relinquishing land currently freshwater to brackish/salt, whereas SMP 7 merely shows Flood Zone categorisation. In addition, within the options described in SMP7 the position describing retention of biodiversity status quo is invalid. The biodiversity value of brackish and saltwater habitats cannot be compared like for like with freshwater habitats as each supports a different range of species. If the prediction is freshwater habitats will be lost in allowing natural processes to occur to benefit the whole focus area covered by the SPD, then these habitats need to be recreated to sustain wildlife dependent on the biotic parameters found within these habitats. Significant areas of low-lying coastal marsh will inevitably be lost and as has been shown in North Norfolk replacing this habitat type may	The Partnership will explore the opportunity to provide guidance relating to compensation. The SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs). The SPD also cannot identify land for rollback and relocation of natural habitat or built development as this is the role of the Development Plan, or for development proposals to demonstrate through planning applications. IT does, however, encourage the consideration of habitat (re)creation	Consider providing guidance relating to compensation and other financial assistance for coastal adaptation projects.

Respondent	Comment	Partnership Response	Changes Made
	only be possible some considerable distance away. Have relocation zones been earmarked where not only the type of the habitat but also the scale (i.e. hundreds of hectares) been identified? Resolving this issue is likely to be much harder (but no less important) than relocating a household or a business threatened from coastal change, and recognition needs to be given to the time needed to create a quality replacement, not just to finding an equivalent area of land. It will likely be that the location for replacement habitats may well fall outside of the relevant SPD area and even planning authority areas for example inland into the Cambridgeshire fens.		
The British Horse Society (Charlotte Ditchburn)	Developers should be provided with information about diverting Public Rights of Way provided by Norfolk County Council at: https://www.norfolk.gov.uk/out-and-about-in-norfolk/public-rights-of-way/public-path orders#:~:text=The%20Council%20has%20a%20power,Bridleways%20or%20Restricted%20Byways%20respectively. And by Suffolk County Council at: https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-and-planning/ / http://www.suffolkpublicrightsofway.org.uk/home/making-changes-to-the-public-rights-of-way-network/	Comment noted. The SPD will set out the powers bestowed upon coastal authorities and our partners that can be used to manage the coast, and coastal management policies and guidance established in Local Plans and national policy.	No change.

8. What guidance on enabling development should be included?

Respondent	Comment	Partnership Response	Changes Made
Stu Precious	Oh puhleeze. this is stupid. The National planning Framework provides this.	National Policy makes provision for enabling development in the context of preserving or enhancing heritage assets. National policy does not make provision for enabling development in respect of coastal matters but this SPD can and does.	No change.
unite the union (Robert Riley)	offshore	While the SPD will pursue Integrated Coastal Zone Management to ensure effective alignment of the terrestrial and marine planning regimes, the SPD cannot provide guidance relating to policies set out in Marine Plans or proposals governed under the marine planning regime,	No change.

Respondent	Comment	Partnership Response	Changes Made
		unless such proposals overlap with the terrestrial planning regime.	
Jeffrey Hallett	What is enabling development in this context? The definition in 5 appears to be just the sort of action by a Secretary of State that I have mentioned in Q 7.	Comment noted. Enabling development is development that would ordinarily be contrary to policy but would secure a particular public benefit which may outweigh the disbenefits of departing from policy.	No change.
Margaret Hallett	Not sure what 'enabling development' means. If it is development that over rules local agreements and concerns it is not wanted.	Comment noted. Enabling development is development that would ordinarily be contrary to policy but would secure a particular public benefit which may outweigh the disbenefits of departing from policy.	No change.
North Norfolk District Council (Harry Blathwayt)	An expected life span of the development, taking into account worst case scenarios regarding the effects of global warming, particularly on water levels and turbulent weather patterns.	Comment noted. The SPD will provide guidance relating to the expected lifespan of development in the CCMA and of the particular public benefit that may enable an assessment as to whether a departure from policy is warranted.	Guidance relating to the expected lifespan of development and of the particular public benefit 'enabled' by the development.
Tessa Aston	Whilst development is always good news for towns it must be done with care. To overload the existing systems and land could be detrimental. Yes Felixstowe wants to increase the revenue brought into the town but it must not affect the existing nature reserve or areas of historical or biological importance. Careful watch needs to be maintained as the climate changes which will affect the sea, port and residential areas. It is a fine balance between improving the town and its facilities without disturbing the fragile environment.	Comment noted; reaching a balance is not always easy, as has been stated but the SPD will aim to help provide guidance on this matter.	No change.
Lindsay Frost	All developments should be as risk free as possible (erosion, storm surge) and not cause interference with natural processes.	Comment noted and it is agreed that it is vital that any enabling development is itself as risk-free as possible and does not cause unjustifiable interference with natural processes. Almost all enabling development would be expected to be outside the CCMA	No change.

Respondent	Comment	Partnership Response	Changes Made
Richard Starling	Await outcome of the Broadland Futures Initiative before we know in detail about relevant options.	This SPD and the Broadland Futures Initiative (BFI) operate within the same topic area, that of coastal change. However, the SPD is very much focussed on providing guidance relating to the implementation of planning policies, whereas the BFI is looking to inform the overarching flood risk management strategy for the next 100 years over a much wider area. The SPD and BFI can complement each other, and the SPD need not be restricted by the timings of the BFI.	No change.
Norman Castleton	There should be no further development apart from defensive work on the coastline	Comment noted but this is not a realistic position – some development (such as for critical infrastructure) will always be necessary and other development may be acceptable and even desirable, so long as the impacts and any risks are not unacceptable	No change.
Norfolk County Council - Natural Environment Team (Catherine Dew)	When ‘enabling development’ there are opportunities to look favourably on developments that provide additional BNG (e.g. 100% -200% above the baseline) and incentives for green roofs....etc. but this will need to be carefully thought out as development will still need to avoid ecologically sensitive areas.	Comment noted. The Partnership will consider providing guidance relating to Biodiversity Net Gain, in anticipation of the provisions of the Environment Act.	Consider providing guidance relating to Biodiversity Net Gain.
Blue Sky Leisure (Paul Timewell)	The SPD needs to acknowledge that Roll-Back can be an expensive process and should provide positive and clear advice on the nature of enabling development that would be considered acceptable, for instance, to help fund roll back proposals. It should include expectations for material and information demonstrating that enabling development is appropriate. It should also provide advice and guidance where enabling development might be a distance away from the activity affected by coastal change, including in another district.	Comment noted. The SPD will provide guidance relating to enabling development, including the circumstances under which enabling development may be acceptable.	No change.
Norfolk County Council - Lead Local	Difficult to really comment much on this in general terms. Therefore, the LLFA would wish to discuss such sites on an individual and detailed basis. We would also request	Comment noted and agreed – each proposal will have to be judged on a case-by-case basis	No change.

Respondent	Comment	Partnership Response	Changes Made
Flood Authority (Sarah Luff)	guidance to be produced on conducting ground investigations, building access routes and putting up storage area that is in accordance with our current LLFA developer guidance and LLFA policies. Again, our requirement for a Flood Risk Assessment and temporary drainage strategy would need to be completed in accordance with our existing guidance.		
Felixstowe Town Council (Ash Tadjrishi)	No comment – this is not currently relevant to Felixstowe - long may that remain so.	N/A	N/A
J E Blanchflower	Suggesting sites for development away from the coast or using 'brown field' coastal sites. Coastal development should be discouraged so that the remaining undeveloped sections of our coastline remain as wildlife habitats to be appreciated by future generations. Above all, no more second homes on coastal sites.	Comment noted. Enabling development would normally be expected to be away from the coast. The SPD has no power to limit whether any new homes are second homes.	No change.
Lowestoft Cruising Club (David Bennett)	Difficult to suggest specific guidance as it depends on the particular development and how it is contrary to policy, and how and to what extent it would secure a particular public benefit which may outweigh the disbenefits of departing from policy.	Comment noted and agreed – enabling development can only be judged on a case-by-case basis	No change.
N/A (Caroline Spinks)	Sometimes NOT to develop may be the more valuable option.	Comment noted.	No change.
Andrew McDonald	Previous experience of the proposed (and actual) use of Enabling Development by Suffolk Coastal D C (and the statements in sections 3.72-3.74 of the recently adopted East Suffolk Local Plan) give cause for concern that Enabling Development may be regarded as a policy option, rather than an exceptional mechanism. It is also difficult to determine from the consultation document exactly what form this 'option' would take – could ED be used as a fundraising mechanism to defray the cost of relocation? Or would it be used as a mechanism for siting relocated	Comment noted. Paragraphs 3.72-3.74 of the Suffolk Coastal Local Plan (SCLP) demonstrate the importance of a plan led system by noting that enabling development may be accepted in exceptional circumstances – in other words, every such case needs to demonstrate the particular justification to warrant a departure from the Local Plan, and the bar is high. Plan-led approaches helpful to relocation and rollback can be practised. Waveney Local Plan Policy WLP6.1 is an	No change.

Respondent	Comment	Partnership Response	Changes Made
	housing in areas which would normally be inaccessible to development? In either case, it is important to take very seriously the restrictions on the use of Enabling Development – as the current Local Plan states, it requires ‘..exceptional individual circumstances..’, and its use in exceptional circumstances ‘... needs to be justified, transparent and deliverable as a comprehensive package, with clear community benefits.’ {para 3.73}. It cannot be adopted in advance as a potential funding or development option, and it is surely preferable for East Suffolk Council to use the existing planning system appropriately, rather than to seek to rely on mechanisms that avoid the planning regulations that have been adopted to protect the community and its environment.	allocation of 220 new dwellings in Reydon, of which seven are reserved for people whose properties have already been lost to erosion, or are at high risk of being lost soon. But there will always be occasions where a case is made for enabling development, which cannot have been envisaged by the Local Plan.	
Peter Terrington	Only essential development considered in coastal fringe.	Comment noted – inappropriate development in the CCMA is by definition not acceptable	No change.
SCEG - Scratby and California Environment Group (Lodge)	Identifying land or sites appropriate for future roll-back use. As much detail as possible to guide the local authorities on what can be done. At what stage to allow action on policy	Comment noted. The SPD cannot identify land for development, for future rollback or relocation, as this is the role of the Development Plan, but will provide guidance to assist.	No change.
Southwold Town Council (Lesley Beevor)	No Comment	N/A	N/A
Water Management Alliance (Jessica Nobbs)	The Board have created a number a document (Planning and Byelaw Strategy) which we believe should be referenced within the SPD when referring to development within one of the Boards IDD which will help other Risk Management Authorities as well and land managers and developers intending to undertake works/development within the IDB districts. The document intends to support other RMAs that relate to flood risk, erosion and environmental matters.	Comment noted. The SPD will reference documents where they would be of relevance to the application of the guidance provided.	No change

Respondent	Comment	Partnership Response	Changes Made
Deben Estuary Partnership (Christine Block)	Points on Enabling Development taken from the appendix to Deben Estuary Plan: Enabling development may be permitted as an exception to policy when delivering sufficient, measurable benefits to flood protection and estuary management which could not otherwise be achieved. Reasons for allowing Enabling Development: •• to provide direct financial benefit to estuary management – focused on essential, long term, flood protection measures within a defined estuary area, necessary to maintain or improve flood defence •• to support opportunities to deliver partnership funding when a lack or shortfall of government grant aid and other finance and restricts action •• to support flood protection measures which have been agreed as necessary by all relevant landowners and consented by the EA Site selection for enabling development should: •• be located outside areas identified by the Environment Agency as being at risk of flooding from estuaries or sea •• be based on a principle of the optimal number of additional dwellings sustainable within a defined parish and estuary area •• be appropriate in scale, sensitive to the topography and mindful of any landscape and environmental designations that apply •• have no significant, adverse impact on biodiversity and geodiversity •• contribute to enhancing or maintaining the sustainability of rural communities in accordance with the Settlement Hierarchy •• deliver development that reflects, when possible, evidenced local need in terms of dwelling size and configuration •• include the conversion or re-use of redundant or disused buildings	Comment noted – reference to this will be made in the SPD and some points may be appropriate for wider application in the SPD area	Make reference to the points on enabling development in the Deben Estuary Plan
Anglian Water Services Ltd (Stewart Patience)	No Comment	N/A	N/A

Respondent	Comment	Partnership Response	Changes Made
Barton Willmore (Will Spencer)	NFOWF Ltd welcomes the recognition in Section 4 of the Consultation Document that there may be circumstances whereby 'enabling development' may be supported. As noted this is development that would be justified based on how its benefits outweigh any disbenefits of departing from policy. The SPD should state that such enabling development may include infrastructure associated with the delivery of renewable energy developments, such as the electricity grid connection for an offshore wind farm or any works/activities associated with its construction (such as the use of ports infrastructure for the assembly/shipping of components). It is not the place of the SPD to seek to impede development which may, subject to appropriate mitigation and effective management, deliver significant overarching benefits to the coastal environment.	The SPD will not set out the types of development that may or may not be granted consent as enabling development, that is for the decision maker on a case by case basis, but the kinds of development suggested here may be essential infrastructure which can only be located at the coast – which means they are not normally enabling development themselves and will be considered elsewhere in the SPD	No change.
Bidwells (Kate Hammond)	Each application should be looked on its own merits/disadvantages and not specifically attached to a set of immovable guidelines.	Comment noted and agreed – flexibility and a case-by-case appraisal will always be necessary for any proposed enabling development scheme	No change.
RSPB (Ian Robinson)	Guidance on enabling development must be clear on the process that needs to be followed to assess the potential impacts. With respect to the environment, the RSPB expects that potential impacts will be captured through a comprehensive Strategic Environmental Assessment and Habitats Regulations Assessment. These will assess options and identify predicted impacts for which there is a very clear process for mitigation and/or derogation and compensation where appropriate. Such a project will need to ensure that the Competent Authority that the overall coherence of the Natura 2000 network will be maintained.	The process for enabling development will be the same for an ordinary planning application. Applications must be submitted with the appropriate evidence and assessments where necessary, which may include Strategic Environmental Assessments and/or Habitats Regulations Assessments.	No change.
The British Horse Society (Charlotte Ditchburn)	Developers should be provided with a copy of 'GG 142 Walking, cycling and horse-riding assessment and review' to ensure any infrastructure relating to development considers all Non-Motorised Users equally. Developers	Comment noted. The SPD will set out the powers bestowed upon coastal authorities and our partners that can be used to manage the coast, and coastal management policies and guidance established in Local Plans and national policy.	No change.

Respondent	Comment	Partnership Response	Changes Made
	should consult the Norfolk Rights of Way Improvement Plan which states: Opportunities for development – To consult with the equestrian/driving community and establish where there are particular opportunities to improve access to create multi-use routes away from roads.’ Developers should be aware of the District or Borough Councils guidance on Public Path Orders as the local planning authorities responsible for changes to the Public Rights of Way Network with regards to development.		

9. What case studies should be used in this SPD to demonstrate coastal adaptation best practice?

Respondent	Comment	Partnership Response	Changes Made
Stu Precious	Hopton Beach. The debacle in causing adverse longshore drift that is Great Yarmouth Outer Harbour. Hemsby, Happisburgh.	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
unite the union (Robert Riley)	work load	N/A	N/A
Jeffrey Hallett	?	N/A	N/A
Margaret Hallett	No idea what this means either	N/A	N/A
North Norfolk District Council (Harry Blathwayt)	We need to study the best practice of other Low Land areas especially the Benelux countries	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
Tessa Aston	Looking at Climate Adaptation Platform, the National Park Service 2015 undertook 24 case studies giving examples of infrastructure and coastal adaptation strategies incorporating climate change, improving public awareness, how to make the infrastructure resilient to climate change. European Climate Adaptation Platform 2018 looked at 10 case studies. NCCARF and CoastAdapt Archive Library - Adaption Good Practice case studies 2017	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.

Respondent	Comment	Partnership Response	Changes Made
Lindsay Frost	Happisburgh, Norfolk from 2009 Coastal realignment in Essex	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
Richard Starling	Who knows !!! Lets us wait for the opportunity for the public to ask questions, find out information from those responsible ie The Environment Agency.	When prepared, the Partnership will consult on the Draft SPD.	No change.
Norman Castleton	The defensive work in Holland and that Sea Palling and work by the RSPB	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
Blue Sky Leisure (Paul Timewell)	The SPD could use the planning permission granted in the 1990s by North Norfolk District Council, that permitted the relocation of 42 vulnerable static caravan pitches from the clifftop at Woodhill Holiday Park, East Runton, to an alternative site in the AONB at Kelling Heath Holiday Park. This is a good example of a successful application of the roll back policy, which has since been successfully implemented and led to the adoption of a positive Local Plan policy to cover this type of development.	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	No examples are known to be available from Norfolk CC Lead Local Flood Authority. This aligns the district councils and the EA are responsible for coastal protection. The LLFA will appreciate that any roll back may involve flooding to Norfolk. We are aware of the Bacton Sandscape Project is an example that NNDC were leading on and received funding for. We are aware that the managed re-alignment or roll back of the coast will have an impact on the infrastructure that the County Council are responsible for e.g. the Coast Road. Therefore, any such policies should take account of this.	Comment noted. The Partnership will explore the opportunity of including the mentioned case study.	Consider Bacton case study.
Felixstowe Town Council (Ash Tadjrishi)	In regard to safety in HTL areas, 2 cases demonstrate options: i) Martello Park Felixstowe ii) Adastral Close Felixstowe (Orwell Housing Assn)	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
J E Blanchflower	Minsmere RSPB Reserve which is of international importance as a wildlife/ornithological habitat and has an unspoiled, undeveloped interface with the sea. The Lowestoft Action Zone includes some imaginative ideas for re-development of the Denes area which was a former fishing hamlet (The Grit) and industrial site. The open spaces/net drying areas will remain for leisure and historical importance.	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.

Respondent	Comment	Partnership Response	Changes Made
Lowestoft Cruising Club (David Bennett)	Any case studies that are relevant to the type of coastline covered by the Coastal Adaption SPD.	Comment noted.	No change.
Andrew McDonald	No comment	N/A	N/A
Peter Terrington	Community instigated flood defence scheme at Waldringfield.	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
SCEG - Scratby and California Environment Group (Lodge)	Ones quoted by the EA for example, the kit house presentation, The relocation of caravan site at Happisburgh.	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
Southwold Town Council (Lesley Beevor)	No Comment	N/A	N/A
Water Management Alliance (Jessica Nobbs)	Aldhurst Farm Leiston wetland creation scheme? whilst compensation for Sizewell C akin to what would be required to enable migration of habitats and species.	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
Deben Estuary Partnership (Christine Block)	No Comment	N/A	N/A
Anglian Water Services Ltd (Stewart Patience)	No Comment	N/A	N/A
Barton Willmore (Will Spencer)	There are a large number of offshore wind farms in the UK that have been successfully delivered without significant adverse effects on coastal processes and/or coastal management. NFOWF Ltd would welcome the opportunity to discuss these with the Councils as a means of identifying one or more examples as coastal adaptation best practice. We trust you will find the above comments helpful in preparing the proposed SPD and we look forward to the draft version being issued for consultation. NFOWF Ltd would be happy to meet to discuss the SPD in more detail should that be considered useful.	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
Bidwells (Kate Hammond)	No Comment	N/A	N/A

Respondent	Comment	Partnership Response	Changes Made
RSPB (Ian Robinson)	The RSPB has developed a range of expertise in managing coastal change projects and consider that the lessons learnt would be valuable for informing appropriate options on the Norfolk and Suffolk coast and further afield. Much of this experience has been gained through close working with the Environment Agency in relation to adapting coastal management and as part of their Habitat Creation Programme. Such projects include: Titchwell; Minsmere North Marsh; Dingle Marshes; Wallasea; Medmerry; plus, many projects overseas working with Birdlife partners and country Governments. We also have a range of advisory material that may be helpful to determine appropriate options based on the ecological requirements for a suite of species and habitats, including: Wet Grassland and Reedbed guides and our contribution within the Fen Management Handbook The principle must be to always operate at a landscape scale employing the Lawton principle – bigger, better, more connected; making best use of opportunities for net gain and creating a more equitable balance between nature and agriculture and business. Equally the benefits of saltmarsh as one of the better habitats capable of sequestering carbon should not be underestimated, but not used as a measure or justification for allowing coastal change. This creates an opportunity to apply net gain principles in creating a new habitat, whilst at the same time relocating existing freshwater habitats and landscapes with better integrated land management to safe locations inland.	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.

10. Do you have any other comments which could help the partnership prepare the Supplementary Planning Document?

Respondent	Comment	Partnership Response	Changes Made
Stu Precious	GO and do your homework. Not at all impressed. Bring a workable proposal, not a pen pushing box ticking exercise.	The initial consultation gave respondents the opportunity to influence the content of the SPD. After taking account of consultation responses the	No change.

Respondent	Comment	Partnership Response	Changes Made
		Partnership Authorities will prepare and consult on the draft SPD.	
Paul Johnson	The document is totally unsuitable for a public consultation as it lacks any attempt to make the content readable by people unskilled in coastal management. The aim of any public consultation is to present information in a manner that it is understandable. My background is education - Post 16, and I'm shocked at the document you are asking ordinary individuals to comment on. I can only assume that the intention is to NOT receive comment. The document is totally unsuitable for presentation to non-specialists. Run it through Flesch Reading Ease and Flesch-Kincaide Grade Level formulas and it's clear comments will be detached and probably irrelevant. Clearly the questions in this survey are designed to ensure only experts answer as the questions are I'm possible for laymen to answer. I've very disappointed, but I appear ill qualified to comment on these questions - a very unsatisfactory arrangement.	It is inevitable that the consultation document (a scoping document, focusing on the proposed areas of content, rather than the content itself) was somewhat technical, given its subject area and the nature of SPDs. However, the Partnership will endeavour to ensure that the draft SPD will be easily understandable to the lay reader and endeavour to keep the use of jargon to a minimum, with a glossary to explain	Technical language has been used sparingly throughout the draft SPD, and a glossary has been provided to help explain technical terms.

Respondent	Comment	Partnership Response	Changes Made
		more technical terms.	
Janet Huckle	I hope that the partnership is able to work together to preserve and maintain our beautiful coastline for the future.	The draft SPD seeks to strike the right balance between guidance in support of the effective management of the coast, and the application of planning policies for coastal adaptation, whether that be concerning development or the natural environment.	No change.
unite the union (Robert Riley)	To get out and meet people at there front of there houses , to engage with people at all local levels . the people of Lowestoft are ,not happy with the INFRASTRUCTURE of the town of Lowestoft . THE PEOPLE of Lowestoft ALL THINK that you have forgotten them .	Unfortunately, Covid-19 reduced the ability to engage with communities in a face to face manner through the initial consultation. However, there has been a good response to the initial	No change.

Respondent	Comment	Partnership Response	Changes Made
		consultation, as with other recent consultations.	
Jeffrey Hallett	Residents and parish councils in the western half of Coastal Authorities must be included in the consultations. Their occupations, shopping, or recreations will often include the shoreline areas.	The initial consultation on the SPD was sent via email and/or letter to all individuals and organisations on the Partnership Authorities' mailing lists, and all town and parish councils. Furthermore, the consultation was open to the public and therefore anyone could have responded to the initial consultation.	No change.
Margaret Hallett	It is important that it is understood that the coastal area is very important to many locals who may live 20 miles from the coast but use the area frequently for work, shops, recreation and entertainment so that the partnership should not be restricted to those from parishes who have a shoreline!	The initial consultation on the SPD was sent via email and/or letter to all individuals and organisations on the Partnership Authorities'	No change.

Respondent	Comment	Partnership Response	Changes Made
		mailing lists, and all town and parish councils. Furthermore, the consultation was open to the public and therefore anyone could have responded to the initial consultation.	
North Norfolk District Council (Harry Blathwayt)	Only that I am concerned that the area I represent is very vulnerable and will be affected greatly by any decisions or recommendations of this body.	The SPD will not make recommendations or policy concerning the coast and development at or near to the coast Comment. It will instead provide guidance for the application of coastal adaptation planning policies.	No change.
Keith Phair	I am aware that the various coastal defences in the area are owned by various bodies and the responsibility for repair and maintenance therefore falls on a range of public and private organisations. It would be highly helpful if these could be mapped and responsibility clearly delineated, so that those organisations and the public have a clear understanding of ownership and responsibility. For example, my understanding is that parts of the prom at Felixstowe are the responsibility of the District Council and other parts are the responsibility of the County Council and other bodies.	Various organisations have roles and responsibilities in relation to buildings, infrastructure and	Set out the roles and responsibilities of key organisations along the coast.

Respondent	Comment	Partnership Response	Changes Made
		the environment along the coast. The draft SPD will set out the roles and responsibilities of some of the key organisations on the coast.	
Tessa Aston	Be guided by what is best for this beautiful area of Suffolk not in monetary value but in consideration of what works right now.	The SPD will provide guidance relating to a number of different considerations that need to be made in decision making, including but not limited to the preservation of the historic and natural environments along the coast.	No change.
Gaius Hawes	1. It seems that the intention here is to create an across the board information and legislation info without any clout. So just informative which although good in one respect. It seems that each authority will do just as it wishes. 2. Is it financially viable to have such an organisation that works with varied authorities that have varying degrees of interest. 3. In the past Suffolk Council has made statements about building distances between planed structures and the sea wall here in Lowestoft. Only for the local authority at the time to overrule what has been published. What are the chances of one area seeing the benefit and there to be realistic control. 4. It is apparent that the Port Authority here has more clout than many appreciate. By closing of roads that have been used by the public for many years. Or even the South Pier. So will the power of Felixstowe lead to unbalanced approach	When adopted, the SPD will be a material consideration and carry weight in the determination of planning applications.	No change.

Respondent	Comment	Partnership Response	Changes Made
	once this is up and running. As money speaks. 5. How often will the body meet to discuss and how will it be managed let alone funded. 6. Although communication should be increased through this I just wonder if it will be used to be abused.	The Partnership preparing the SPD includes East Suffolk Council, Great Yarmouth Borough Council, The Broads Authority, North Norfolk District Council, and the Coastal Partnership East Team. The Partnership is therefore operated by officers from each Local Planning Authority and funded by the authorities involved.	
Lindsay Frost	Must include adaptations to climate change and isostatic readjustment	The SPD realises that coastal change is inherently linked to climate change, and it is through Local Plan policies, SMPs and	No change.

Respondent	Comment	Partnership Response	Changes Made
		Environment Agency advice on sea-level rise rates etc that these factors are taken into account.	
Michael Castle	1. I accept the premise for a whole coast strategy whilst needing to point out that GT YARMOUTH town stands out as an exception in that - like HULL further up the coast - it is a densely populated settlement with port and industrial infrastructure that needs to be defended by engineering solutions. To that extent it differs from the bulk of the coastline between the Orwell and the Wash. The BACTON inter-connector gas pipeline is another location where engineering may be the preferred approach. 2. Roll-back and relocation are considerations for coastal villages further North in the Borough - for example WINTERTON, SCRATBY and HEMSBY - although the latter's holiday industry is a complicating factor to such an approach. 3. In the case of the town area of GT YARMOUTH itself it will be important to show that difference in terms of the long-term strategy and acknowledge the ongoing large Environment Agency investment in River Defences along the Yare and Bure to bring those up to 1:200 year standard and to acknowledge the strategic regeneration development sites on Yarmouth river frontages.	The SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs). However, the different nature of the whole coast is, of course, recognised, both in SMPs and Local Plans. The SPD will provide helpful guidance, but it will not be a 'one-size-fits-all' approach.	No change.
Richard Starling	I suppose you have to find something to do but please just wait until we have information and facts from the Environment Agency. There is no urgency to complete a Supplementary Planning Document.	This SPD and the Broadland Futures Initiative (BFI) operate within the same topic	No change.

Respondent	Comment	Partnership Response	Changes Made
		area, that of coastal change. However, the SPD is very much focussed on providing guidance relating to the implementation of planning policies, whereas the BFI is looking to inform the overarching flood risk management strategy for the next 100 years over a much wider area. The SPD and BFI can complement each other, and the SPD need not be restricted by the timings of the BFI.	
Great Yarmouth Borough Council (Environmental Services) (David Addy)	I can confirm that Great Yarmouth Borough Council's Environmental Services supports the proposed Coastal Adaptation Supplementary Planning Document, and has no detailed comments to make.	Support noted.	No change.

Respondent	Comment	Partnership Response	Changes Made
Robert Wynn and Sons (Tim West)	We read with interest the Coastal Adaptation Supplementary Planning Initial Consultation Document, which sets out the purpose and planned scope for your document. We would very much support your whole coast approach taken by yourselves. We would wish to highlight that there are power generation and transmission sites earmarked for development within your region that will require the movement of large and heavy abnormal indivisible loads. Due to the size and weight of transformers, generators etc project developers should be encouraged to limit the road mileage travelled by such loads. Such sites would include Sizewell C and the onshore connections for the many offshore windfarms planned in your region. Planning guidance should not be a barrier, more so should facilitate the opportunities for beach landing suitable craft for the delivery of the largest and heaviest abnormal indivisible loads. Subject to achieving a marine licence via the Marine Management Organisation and permissions from landowner (Crown Estate & Local Authority) beach landings can and have been used to significantly reduce the road mileage travelled by the largest abnormal loads. We would be happy to input when appropriate to the development of further guidance on coastal development and attach a few images of beach landings where either no infrastructure was required or where temporary infrastructure was created and then removed.	The guidance provided within the draft SPD may be of relevance to planned large scale infrastructure projects. In addition, the SPD will pursue Integrated Coastal Zone Management to ensure effective alignment of the terrestrial and marine planning regimes. However, loads required to be moved by sea may form part of nationally significant energy projects, which would not require planning permission but a Development Consent Order under the Planning Act	No change.

Respondent	Comment	Partnership Response	Changes Made
		2008. In such circumstances, the draft SPD would not be relevant.	
Martlesham Sea Wall Group (Thomas O'Brien)	I live in Martlesham Heath, just East of Ipswich. Its an area planned for immense growth. So a group of us has come together to try and increase foot access along the river Deben. (Martlesham River Wall Group). In particular we would like to see Martlesham Creek linked with Waldringfield. A public footpath exists but the sea wall has been broken at one point making the path unpassable. Currently Natural England are supporting the English Coast Path along the river Deben. Which includes forming a footpath from Martlesham Creek to Waldringfield. Discussions are under way to create this. Your plan should stipulate the importance of the England Coast Path and its value to the public. As well as this, at the last general election, two political parties supported the idea of a Suffolk Coast National Park. An idea could be to expand the Broads National Park to include Suffolk Coast. (Save on administration). I think your report could suggest the idea of a Norfolk and Suffolk National Park. Some bodies can have an overly negative attitude to public access. In particular the conservation groups are developing a 'landowner' mentality. Taking claim to wide stretches of the coast and estuaries assuming it belongs to them, preventing public 'disturbance' but nevertheless turn up whenever they wish in 4 wheel drive vehicles and trample everywhere looking for rare plants and insects. Also introducing animals such as Exmoor ponies which means widespread fencing which in turn inhibit public access. But the fact remains places like Martlesham are growing considerably. Its only fair to the inhabitants of these new towns to provide access to the outdoors. The two issues of planning for new dwellings and protecting our coast should not be two separate issues. If new dwellings are planned near the coast then inevitably the public will seek to enjoy the outdoors. We cannot just put a barbed wire fence around new communities. Some thought can be put to shielding footpaths with fences, and regular bird hides so that the wildlife can be protected and at the same time the public can enjoy being there.	The SPD will not propose works or development within the SPD area, however the guidance provided within the SPD may be of relevance to such works or development. The SPD will primarily focus on providing guidance relating coastal planning policies, however public access to our coast and estuaries is of great importance and will be an important consideration in the application of	No change.

Respondent	Comment	Partnership Response	Changes Made
		coastal planning policies.	
Michael Powles	East Norfolk and North East Suffolk Our coastlines are under threat from the sea and from the landward side. Eventual inundation of coastal areas from the sea as a result of global warming is now a given. Melting glaciers and disintegrating polar ice caps are visible, measurable and credible. It is not a question of if, but when, we shall be overwhelmed by the sea and/or rivers backing up. The town of Great Yarmouth and much of the rest of the borough is surrounded by water and marshes. The latter are mostly at or below existing sea level. Gt. Yarmouth and parts of Lowestoft are already highly vulnerable to flooding from sea and rivers. If the sea defences are breached salt water could travel long distances inland and flood places like Hickling, Potterheim, areas around Acle and all along the river courses and through the Broads. Volatile shore lines still come and go but long term residents are clear that the overall trend is for the shoreline to retreat inland where not defended. From the landward side the coastline is vulnerable as a result of excessive development over many years, leading to ever increasing levels of human footfall and leisure activities. The trend to seek out natural undeveloped coastline for recreation as opposed to the pre-war habit of holidaying in recognised and organised tourist centres such as, Cromer, Gt. Yarmouth, Lowestoft, Southwold and Felixstowe, has given way to holidaying in venues closer to nature. Such natural venues are increasingly unable to safely meet demand. With almost universal ownership of the motor car; narrow rural roads, coastal public open spaces and small end of the road fishing villages are being regularly overwhelmed by tourists. Increasing holiday accommodation and other infrastructure, such as parking lots, designed to meet demand is simply increasing the problem. Important wildlife areas such as Minsmere, Winterton-Horsey Dunes SAC and Cley, to mention but a few, are under unsustainable threat. Much of the Broads National Park is vulnerable to salt water incursion. The Northern parishes of Great Yarmouth , which are jammed between the river Bure and the North Sea, are filling up with new houses at an alarming rate – leading to ever more human (and canine) footfall on protected areas and vulnerable coastline. Everybody who would like to live in the area cannot be accommodated by trying to fit a barrel into an egg cup. RECOMMENDATIONS Protect essential communications infrastructure from unmanageable pressure, such as the only road connecting the northern parishes of Great Yarmouth to the rest of the borough south of Caister; Limit access to specially protected areas; Put wild life requirements before commercial profits; Prevent all development in areas susceptible to flooding or being cut off and encircled by water; (This could be up to 10 miles from the sea, or even more in some places) . Provide large green public spaces, well behind the immediate shoreline, and closer to major developments and conurbations, to help take the pressure off the shorelines and protected coastal conservation and wildlife areas. Limit parking in or near to vulnerable and sensitive areas and critical natural sea defences.	The SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs). Nor can the SPD create new or amend existing planning policies as this is the role of the Development Plan and National Policy. The SPD will, however, provide guidance relating to the implementation of costal adaptation planning policies.	No change.

Respondent	Comment	Partnership Response	Changes Made
The British Horse Society (Charlotte Ditchburn)	I am writing on behalf of the British Horse Society (BHS) a membership charity with over 112,000 members representing the UK's 3 million regular riders and carriage drivers, in response to the current consultation on the Fareham Borough Local Plan. The BHS is the largest and most influential equestrian charity in the country, working to improve the lives of horses and their owners through its four core foundations of education, welfare, safety and access. 1. BACKGROUND TO OUR COMMENTS Nationally, it is estimated that there are 3.5 million people in the UK who ride or who drive a horse-drawn carriage. Hampshire has among the highest densities of horse ownership in the country (source: former National Equine Database). We estimate that 220,000-270,000 are employed in equine industries and the equine industry is estimated to be contributing at least £7 billion each year to the local economy, mainly through goods and services supplied by small businesses such as feed merchants, vets, farriers, trainers, saddlers, etc. Road Safety is a particular concern to equestrians, who are among the most vulnerable road users. Between November 2010 and March 2019, the BHS received reports of 3,737 road incidents, in which 315 horses and 43 people were killed. Research indicates however that only 1 in 10 incidents are being reported to the BHS; in 2016-17 alone, 3,863 horse riders and carriage drivers in England and Wales were admitted to hospital after being injured in transport accidents. (NHS Hospital Episodes Statistics). The BHS actively campaigns to improve road safety by making motorists aware of what to do when they encounter horses on the road (see https://www.bhs.org.uk/our-work/safety/dead-slow – we recommend taking a few minutes to watch the 'Dead Slow' virtual reality film for an impression of how vulnerable equestrians are in proximity to cars and lorries). Because of the difficulties that equestrians encounter on roads, they avoid using them wherever possible. Road use is often unavoidable, however it is simply because people have nowhere else to exercise their horses. The main off-road access available to them is the network of Rights of Way (RoW). England and Wales have over 140,000 miles of RoW, but only 22% of this network is available for horse riders (who may only use routes designated as Bridleways and Byways) and a mere 5% to carriage drivers (who only have access to Byways). An additional factor is that the network is fragmented, and roads are often the only available links between one RoW and the next. 2. COASTAL ADAPTATION SUPPLEMENTARY PLANNING DOCUMENT INITIAL CONSULTATION a. Are there any elements of National or Local Planning Policy which should be particularly emphasised/explained in the SPD? Yes b. What guidance for development in the Coastal Change Management Area should be identified in the SPD? Guidance for development in the Coastal Change Management Area should include guidance regarding access, including the BHS leaflet for developers and planners enclosed with this letter. A document such as the 'Equestrians in Hampshire – a reference guide for Transport, Planners, Developers and other decision makers' mentioned below should be developed for each county and used for Norfolk and Suffolk. At very minimum developers should be aware of their duties regarding 'Public Rights of Way affected by coastal and estuarine change or management' provided by Suffolk County	The first part of the respondent's comments relate to the Fareham Borough Local Plan consultation, which is of course not relevant to the SPD. The SPD cannot create or amend planning policies as this is the role for the Development Plan, nor can it create or amend policies for the management of coast, as this is the role of Shoreline Management Plans. The SPD can provide guidance to help implement coastal adaptation planning policies. Where relevant to the	No change

Respondent	Comment	Partnership Response	Changes Made
	Council at: https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/rights-and-responsibilities/public-rights-of-way-affected-by-coastal-and-estuarine-change-or-management/ c. Are the categories identified in section 3 appropriate and comprehensive or should others be identified? The 3 categories are appropriate. d. What guidance on temporary development within the Coastal Change Management Area should be included? The same guidance should be provided for temporary development as that for permanent development in the Coastal Change Management Area. e. What guidance on Roll-back and relocation options should be included? Developers should be provided with information about diverting Public Rights of Way provided by Norfolk County Council at: https://www.norfolk.gov.uk/out-and-about-in-norfolk/public-rights-of-way/public-path-orders#:~:text=The%20Council%20has%20a%20power,Bridleways%20or%20Restricted%20Byways%20respectively. And by Suffolk County Council at: https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-and-planning/ / http://www.suffolkpublicrightsofway.org.uk/home/making-changes-to-the-public-rights-of-way-network/ f. What guidance on enabling development should be included? Developers should be provided with a copy of 'GG 142 Walking, cycling and horse-riding assessment and review' to ensure any infrastructure relating to development considers all Non-Motorised Users equally. Developers should consult the Norfolk Rights of Way Improvement Plan which states: Opportunities for development – To consult with the equestrian/driving community and establish where there are particular opportunities to improve access to create multi-use routes away from roads.' Developers should be aware of the District or Borough Councils guidance on Public Path Orders as the local planning authorities responsible for changes to the Public Rights of Way Network with regards to development. 3. OTHER COMMENTS Within Norfolk and Suffolk, there is a both a demonstrable demand for safe access for equestrians and a documented lack of provision. The issues identified in the Norfolk Access Improvement Plan 2019-2029 which states 'The network of bridleways, restricted byways, byways open to all traffic and unclassified country roads (UCRs) across Norfolk is sparse and scattered with a minimal number of joined up circular routes'. We hope that the Coastal Adaptation Supplementary Planning Document will take the opportunity to address the disjointed nature of Norfolk and Suffolk's Right of Way network and should include: a. Recognition of equestrians as vulnerable road users Historically, pedestrians and cyclists have been considered as the main vulnerable road users. Equestrians are however increasingly recognised as being part of this group: during the Parliamentary Debate on Road Safety in November 2018 Jesse Norman, Under Secretary of State for Transport, stated that "We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders." We therefore ask that the Coastal Adaptation Supplementary Planning Document includes Norfolk and Suffolk's equestrians as vulnerable road users, to ensure that their needs are considered equally alongside	implementation of coastal adaptation planning policies guidance relating to access along the coast will be included within the SPD, including as related to the rollback and relocation of development.	

Respondent	Comment	Partnership Response	Changes Made
	those of pedestrians and cyclists. b. Equestrians to be included in any shared-use routes, wherever possible in order to maximise opportunities within development to help provide more off-road links for equestrians, where shared-use routes are created for active travel as a part of any development, planning policy should support the automatic inclusion of horse riders on shared off-road routes, unless there are specific reasons why this is not possible. Conflict with cyclists is sometimes given as a reason for excluding horses from shared routes, but this rarely has anything to do with either the horse or the bicycle, simply the inconsiderate person who happens to be riding one or the other. Horse riders and cyclists as two vulnerable road user groups have more in common with each other than differences. This is illustrated by the work that the BHS are doing in partnership with Cycling UK in the current 'Be Nice, Say Hi!' campaign and with Sustrans in their 'Paths for Everyone' initiative. The key to a successful shared route is the design: for example, rather than positioning a cycle path down the centre of a route with verges either side, the cycle path should be positioned to one side and the two verges combined to provide a soft surface for walkers, runners and horses on the other. (This also addresses the issue of horse droppings which, as research has confirmed, represent no danger to health and disperse quickly, particularly on unsurfaced paths.) 4. CONCLUSION Horse riding is a year-round activity which (along with associated activities such as mucking out and pasture maintenance) expends sufficient energy to be classed as moderate intensity exercise. The majority of those who ride regularly are women, and a significant proportion of riders are over 45. For some older or disabled people, being on horseback or in a horse-drawn carriage gives them access to the countryside and a freedom of movement that they would not otherwise be able to achieve. There are also considerable psychological and social benefits from equestrian activities, as the BHS is demonstrating through the Changing Lives through Horses initiative. Equestrianism is a popular activity in both of the counties of Norfolk and Suffolk, and one which contributes significantly to the local economy. The equestrian community in Norfolk and Suffolk currently have many difficulties in finding safe access within the area, mainly as a result of past development. Many of these issues could be addressed and resolved through good planning of future development. We hope therefore that the Coastal Supplementary Planning Document will include policies that will support this.		
Norman Castleton	The routes to obtaining the necessary finance.	The draft SPD provides some guidance relating to funding development and/or coastal management	Identify potential funding mechanisms for the implementation of coastal

Respondent	Comment	Partnership Response	Changes Made
		measures. However, the purpose of the SPD is not to provide financial assistance but to aide the implementation of coastal adaptation planning policies.	adaptation planning policies
Bungay Town Council (Jeremy Burton)	A ring main system would be preferable to one-to-one windfarm access to the shoreline. Coastal management is another issue and any changes in the sea will have an effect at some point along the coastline. Any coastal management subsequently required should also be funded by Central Government.	The SPD cannot create or amend planning policies as this is the role for the Development Plan, nor can it create or amend policies for the management of coast, as this is the role of Shoreline Management Plans. The SPD can provide guidance to help implement coastal adaptation planning policies.	No change.

Respondent	Comment	Partnership Response	Changes Made
Norfolk County Council - Natural Environment Team (Catherine Dew)	Green Infrastructure and establishing measurable biodiversity net gain should be a fundamental part of development proposals/asset relocation (not an after-thought). There is potential for creating new habitats which benefit both Norfolk's biodiversity and recreation. Green roofs will help mitigate the effects of climate change for example by reducing the carbon footprint of buildings.	The SPD will set out the affects that coastal processes and policies can have on the natural environment. The SPD will provide guidance for biodiversity and the natural environment where relevant to the implementation of coastal planning policies, however it cannot create or amend planning policies as this is the role of the Development Plan.	No change.
Norfolk Police (Penny Turner)	Having examined this on the portal link provided, Norfolk Police will not be commenting at this stage but look forward to more input on the forthcoming draft document.	Comment noted.	No change.
Blue Sky Leisure (Paul Timewell)	Together with Glyn Davies, of Glyn Davies Planning, we advise Blue Sky Leisure (BSL) in respect of planning matters on a number of sites in the Company's control, including an established Caravan and Camping site on the cliff top at Woodhill Park, East Runton, nr Cromer - in the North Norfolk District Council area. We appreciate that the SPD is still in its early stages and this current consultation is more about its suggested content, but we are pleased to have the opportunity to get involved and help shape the document. Over the years together with BSL, we have developed considerable knowledge and experience in working with North Norfolk District Council	Support and comment noted. The rollback development mentioned forms part of the case	No change.

Respondent	Comment	Partnership Response	Changes Made
	to develop Local Plan policies dealing with coastal adaption The Company has also successfully implemented the Council's Local Plan 'roll back' policy to relocate vulnerable cliff top caravan pitches at Woodhill to an inland location. More recently, we are presently engaging with North Norfolk Council Officers, concerning the latest impact of cliff erosion on Woodhill's operations and discussing how best to deal with these impacts. Consequently, we are very interested in the emerging SPD. BSL would be happy to share advice, its experience and knowledge dealing with the impacts of coastal erosion on its business, and how issues have been overcome in the past and potential opportunities for over coming issues in the future. Please do contact me in the first instance should this be of interest.	studies appended to the draft SPD.	
Nigel Doyle	Further to the consultation that you are currently undertaken, please find attached a copy of a Chief Officer's note on the subject recently produced, following consultation, in Cornwall. The topics in it seem equally relevant to East Anglia and hopefully it will assist. Attachment: https://eastsuffolk.inconsult.uk/gf2.ti/af/1172354/300644/PDF/-/final-chief-planning-officer-note-planning-for-coastal-change-march-2020.pdf	The content of Cornwall Council's planning note on coastal change from March 2020 addresses coastal adaptation planning policy from the Cornwall Local Plan, relevant Shoreline Management Plans and while the policies are different to those set out in the SPD area some of the context is relevant, particularly in relation to national policy, guidance and legislation.	No change.

Respondent	Comment	Partnership Response	Changes Made
Norfolk Coast Partnership (Gemma Clark)	Some general comments include:- How the Heritage Coast designation is included as part of the safeguarding of the coast Tools such as LCA and LVIA's and their importance in addressing landscape impact. The role of AONB's both in protecting our coast and through working in partnership finding opportunities for enhancement that benefits landscape, biodiversity and people.	The draft SPD provides guidance relating to coastal adaptation planning policies and the impact of the implementation of such policies on environmental designations, to avoid harm and ensure appropriate mitigation where necessary.	No change.
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	Please ensure reference to the LLFA Guidance document and its contents is included. This document and the principles within it should be promoted as widely as possible as it addresses a large amount of general questions about the LLFA requirements and the LLFA review process. An update of this document is currently being prepared and should be published by the end of the year. We can confirm that at present the requirement for consents to works on ordinary watercourses and for any work that will impede the flow would remain. Furthermore, we recommend that consideration of any local flooding records are made and reflected in any site development proposals.	The draft SPD provides guidance on the implementation of coastal adaptation planning policies. However, the draft SPD also sets out the roles of responsibilities of organisations operating and managing on the coast.	No change.

Respondent	Comment	Partnership Response	Changes Made
Felixstowe Town Council (Ash Tadjrishi)	A) Mapping Good mapping is desperately needed, and essential, including but not limited to: Precise seaward and landward extent of the CCMA's 30m zone. The mapping on the LP is inadequate. This should be done at scales appropriate to the area involved: in built up areas large scales are essential. For HTL areas, the new LP extends part of the concept from the CCMA to define an area of typically 30m from current defences to ensure future maintenance access is not inhibited, and where appropriate to require Erosion Vulnerability Statements to be provided in planning applications. The SPD should map those areas at large scale so that all parties can see the implications clearly. Similarly, "coastal maps" for individual areas should clearly incorporate the SMP designations, at scales appropriate to the type of location. They should also contain easily used links to the current EA Flood Zone mapping, or software can be utilised, direct to that from the EA website. B) Implications for resort frontages. In coming decades seafront infrastructure will be directly affected by Sea Level Rise. Promenades and their immediate hinterlands (e.g. in Felixstowe the Spa Gardens) will need to adapt. Higher and more robust structures will be needed to protect the usability of current assets, possibly glass flood walls, or other wholly new thinking. While this is hopefully some decades away, current maintenance and development of resort facilities should be aware of these future issues. In particular the decorative walls to the rear of Felixstowe promenade will need to be replaced with wave-resistant structures, possibly within a decade. Whether by general phrasing, or by locally specific sections, these issues should be outlined. C) Flood risk in South Felixstowe. In South Felixstowe we have a situation with a very low risk of a very severe flood event. i.e. there are two scenarios which the SPD should include in planning advice: i) A very exceptional tidal event could, even today, generate tides a further metre above previous events, and that will become progressively more likely over time. In that event flooding in the Langer Road area could be a metre more severe than in 1953. ii) Even in a less severe event, the possibility should be accounted for that the existing defences could fail, either by damage from severe wave action, or by an operational failure if the flood gates were not closed for some unforeseen reason, including the eventuality that severe weather could impede access to the town for Norse / EA staff to close the gates. With the current recent change to EA Flood mapping, the area has been reduced from Flood Zone 3 to Flood Zone 2, apparently because the mapping omitted the presence of defences along the frontage, as indeed also on the Golf course frontage. Hopefully that will be reversed – it is under investigation. However, the SPD should reinforce NPPF advice that developments in such areas should be "safe for the lifetime of the development. That should encompass no sleeping accommodation on the ground floor, and no single-storey residential accommodation without an internal escape route to first floor level. We believe this type of advice is properly admissible under the NPPF and does not constitute "new policy".	The draft SPD does not contain new maps of existing metrics set out in Shoreline Management Plans or Local Plan policies. However, the Partnership is open to the idea of preparing maps that would aid the implementation of coastal adaptation planning policies. The SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs). The draft SPD provides guidance relating to the implementation	No change.

Respondent	Comment	Partnership Response	Changes Made
		of coastal planning policies within both the Local Plans and National Policy but cannot create new, or alter existing, policy. Guidance is provided on the preparation of Coastal Erosion Vulnerability Assessments to ensure development proposals are safe over their planned lifetime.	
J E Blanchflower	The coast from Holkham to Felixstowe is one of East Anglia's most important assets in terms of the natural beauty of the sections where there is little or- no development. It is important that these sections are preserved and natural processes are allowed to take place. Failure to respect this will result in overdevelopment such as along the south coast. 'Public realm infrastructure' [I think I understand what the jargon implies] has already had a substantial impact (Felixstowe Docks, Sizewell A & B, Bacton Gas installation, numerous caravan parks in the Lowestoft/Gt Yarmouth area to name a few) and should not expand further into natural habitats.	The draft SPD sets out the impacts that coastal processes and policies can have on the natural environment and provides guidance in relation to the avoidance of harm to the	No change.

Respondent	Comment	Partnership Response	Changes Made
		special qualities of environmental designations. The SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs). Nor can the SPD create new or amend existing planning policies as this is the role of the Development Plan and National Policy.	
Lowestoft Cruising Club (David Bennett)	The Lowestoft Cruising Club (LCC) is located at the western end of Lake Lothing. Our activities encompass cruising local and more extensive waters in sailing and small motor vessels. Our site is subject to flooding during tidal surges. We therefore fully support the Lowestoft Flood Risk Management Project which is shortly to be undertaken with raised sea walls and a flood barrier just east of the current bascule bridge. This should alleviate flooding in Lake Lothing and at the LCC site. The maintenance of an operational port of Lowestoft, which is owned and operated by ABP, is essential to LCC activities. We have been involved in the Planning Inquiry and discussions with Suffolk County Council (SCC) on the construction of the Gull Wing third crossing of Lake Lothing. There are potential adverse impacts on the activities of all vessels operating from the western end of Lake Lothing. There are extensive plans for redeployment of land surrounding Lake Lothing. It is essential that the Coastal Adaption SPD provides guidance on such coastal developments and the consequences for all users of	The Partnership has considered these points, but considers in general that they relate more to flood risk than coastal erosion. The flood risk and planning situation	No change

Respondent	Comment	Partnership Response	Changes Made
	Lake Lothing. It is issues like these that need to be covered by the Coastal Adaption SPD. While they are specific issues, and the Coastal Adaption SPD is covering a large extent of coastline, local issues need to fully considered.	in the Lake Lothing area is considered in the Waveney Local Plan (2019) and Shoreline Management Plans. Moreover, the SPD cannot comment on specific development proposals, but provide guidance relating to the general implementation of coastal adaptation planning policies only.	
Marine Management Organisation (Stacey Clarke)	Many thanks for giving us the opportunity to respond to the Coastal Adaptation Supplementary Planning Document, covering the coast from Holkham in Norfolk to Felixstowe in Suffolk. Please find attached our response letter which contains general marine planning information and legal responsibilities as well as specific consideration for the Coastal Adaptation SPD. In addition to this, if you, or any of the other relevant authorities, would like further information on the East Marine Plans, I would be happy to provide a meeting covering general information on marine planning, monitoring and implementation of the east marine plans, tools for implementation and an update on the development of marine plans in England.	Marine and terrestrial planning are inherently linked, and consideration has been given to the relationship between the development plans for the SPD area, the	No change

Respondent	Comment	Partnership Response	Changes Made
		Shoreline Management Plans, and the Marine Plans. The draft SPD provides some guidance as to the role of marine planning regime in the wider context of the implementation of coastal adaptation planning policies of the terrestrial development plan.	
Paul Bailey	The objectives of the SPD are well defined. You are correct the issues are relatively simple; the erosion of land and rise in sea level.... as King Canute clearly demonstrated. The extent of the problem can easily be identified by superimposing or overlaying the two elements on a plan. This would also show the potential inland flooding which would approach from a different direction and enable a rear-guard action plan. But surely, this already exists and current actions are in place to ban residential building and restrict commercial development in the defined areas. Is the purpose of the SPD is to recommend the parameters e.g. 1 kilometre from shore and 5 metres from current high tide level. The implications, this is the really difficult question. The previous analysis would identify assets at risk. These could be graduated on a more detailed risk assessment. Everyone must be involved and consulted, the potential costs and social disruption will be huge. A detailed plan and financial impact analysis needs to be completed as soon as possible. This should be the primary function of the SPD. I think the impact study and roll-back plans will take significantly longer than establishing the development recommendations. Although intrinsically linked the first should not be delayed at the expense of the latter. Overall I agree we need a holistic collaborative approach, the coast is dynamic and our actions need to be equally so. The number of bodies involved needs to be small, impartial and empowered. Remember, the camel is	Shoreline Management Plans are the main mechanism for deciding on the appropriate management regime for the coast, with Local Plan policies also playing a part; the SPD cannot do so (as it can only provide further	No change

Respondent	Comment	Partnership Response	Changes Made
	a horse designed by a committee, we do not have that luxury if the forecasters are correct. Finally, we should not be reinventing the wheel, our close friends in the Netherlands have potentially greater issues than Norfolk.	guidance and support on the implementation of Local Plan policies). The Environment Agency is the key organisation working on flood risk matters, and the councils work closely with it.	
Somerton Parish Council (Gill Lack)	1. The coronavirus restrictions have prevented us from carrying out normal meetings where members of the public can attend. The same restrictions apply to District Councils. It should be accepted that conducting a consultation during these difficult times is not appropriate since a significant proportion of the population may not be aware of it and/or unable to participate with a response. 2. Currently, we have the Broads Futures Initiative (BFI) consultation/project ongoing. This particular consultation should include and address the same points raised in this particular consultation. We therefore request that the Supplementary Planning Consultation (SPC) be postponed until the BFI project is completed. 3. The BFI consultation/project aims to work closely with local people, listen to their views with the decisions made by elected representatives. The process hopefully will include opportunities for local people to ask questions and make suggestions regarding the same, if not similar, points to that raised in the SPC consultation. How can people respond to the SPC consultation without having the latest information regarding flood risk, land levels etc etc.?	The limitations imposed by Covid have made things difficult, as stated. However, local authorities have tried to maintain their normal work activities and given that it was not known how long social distancing would need to be maintained, local authorities had to do the best they could to allow engagement (putting	No change

Respondent	Comment	Partnership Response	Changes Made
		documents online, using social media etc) and continue progressing important pieces of work – such as the SPD. There was a very good response to the initial SPD consultation. This SPD and the Broadland Futures Initiative (BFI) operate within the same topic area, that of coastal change. However, the SPD is very much focussed on providing guidance relating to the implementation of planning policies, whereas the BFI is looking to inform the overarching flood risk management	

Respondent	Comment	Partnership Response	Changes Made
		strategy for the next 100 years over a much wider area. The SPD and BFI can complement each other, and the SPD need not be restricted by the timings of the BFI.	
Woodton Parish Council (Yvonne Wonnacott)	Woodton Parish Council views the joint approach by the Counties as a positive way forward in the right direction and we will wait to hear further developments.	Comment noted.	No change
Andrew McDonald	Thanks for the opportunity to comment at the outset of the consultation.	Comment noted.	No change
Burnham Overby Parish Council (Sarah Raven)	It would be helpful to have a stronger voice where all parish councils along the coast joined forces and that perhaps resilience groups that are proactive help more than being post active after the event has happened.	The Norfolk and Suffolk Associations of Local Councils (NALC and SALC) may be able to assist, but this is not a matter directly for the SPD. Resilience groups do a great deal of proactive work in relation to planning for emergencies and	No change

Respondent	Comment	Partnership Response	Changes Made
		are not just reactionary.	
Andrew McDonald	I am writing to raise one particular issue on behalf of a small group of local residents who have been involved recently in leading the opposition to the inappropriate use of Enabling Development in East Suffolk – specifically over the last two or three years in the context of raising funds for river defences. We’d like to offer this point of view on the contents of section 5 of the document, ‘Delivery and Enabling Development’. Previous experience of the proposed (and actual) use of Enabling Development by the then Suffolk Coastal D C (and the statements in sections 3.72-3.74 of the recently adopted East Suffolk Local Plan) give us cause for concern that Enabling Development may be regarded as a policy option, rather than an exceptional mechanism. It is also difficult to determine from the consultation document exactly what form this ‘option’ would take – would ED be used as a fundraising mechanism to defray the cost of relocation? Or would it be used as a mechanism for siting relocated housing in areas which would normally be inaccessible to development? In either case, it is important to take very seriously the restrictions on the use of Enabling Development – as the current Local Plan states, it requires ‘..exceptional individual circumstances..’, and its use in exceptional circumstances ‘... needs to be justified, transparent and deliverable as a comprehensive package, with clear community benefits.’ {para 3.73}. It cannot be adopted in advance as a potential funding or development option, and it is surely preferable for East Suffolk Council to use the existing planning system appropriately, rather than to seek to rely on mechanisms that avoid the planning regulations that have been adopted to protect the community and its environment. We’d be happy to discuss this further, or to contribute otherwise to the consultation.	Paragraphs 3.72-3.74 of the Suffolk Coastal Local Plan (SCLP) demonstrate the importance of a plan led system by noting that enabling development may be accepted in exceptional circumstances – in other words, every such case needs to demonstrate the particular justification to warrant a departure from the Local Plan, and the bar is high. Plan-led approaches helpful to relocation and rollback can be	No change

Respondent	Comment	Partnership Response	Changes Made
		practised. Waveney Local Plan Policy WLP6.1 is an allocation of 220 new dwellings in Reydon, of which seven are reserved for people whose properties have already been lost to erosion, or are at high risk of being lost soon. But there will always be occasions where a case is made for enabling development, which cannot have been envisaged by the Local Plan.	
Cornerstone Planning Limited (Alan Presslee)	Thank you for consulting on the Draft Coastal Adaptation Supplementary Planning Document (SPD). I hereby respond on behalf of the Royal Cromer Golf Club. The club is located on the cliff top – east of Cromer – and has seen its land slowly eroded over the years. The club is looking at options for its future security/viability, including possible planned contingencies to replace golf holes close to the cliff top, which are under imminent threat of loss through coastal erosion. The Golf Club welcomes the Councils’ initiative in developing plans for Coastal Adaptation. Nobody would suggest that there should not be appropriate consideration of the environmental impacts of new development in sensitive coastal areas. However, planning policies need to be applied with	The Partnership notes the comments and recognises the challenges that many coastal golf courses face in	No change

Respondent	Comment	Partnership Response	Changes Made
	flexibility and pragmatism, and there should be a rounded consideration/appreciation of the commercial, operational and practical constraints presented by losing land to the sea, and combating same. In the case of a golf course the loss (or threat of loss) of a one or more golf holes doesn't just represent a small, proportionate loss of some operational land: the loss of a golf hole makes the course unviable (it has to have 18 golf holes!). The noun 'Adaptation' is in the title of the document; so, the ability, facilitation and support (from Councils) to be able to adapt - commercially and environmentally - is absolutely crucial in the changing 'climate'. Cromer Golf Course (and many other seaside golf courses) is in a location where – few would argue – planning permission is unlikely to be forthcoming if applied for today, given the myriad of environmental, ecological and landscape constraints on the coast. Yet, with the passage of time and the implementation of sensitive and proactive environment policies in the management of the golf course, the course is in harmony with its surroundings/environment. In being able to adapt to coastal erosion, and support the local economic, recreational and environmental benefits of the golf course, we are looking for the support of planning policies and this SPD (as a material consideration) to – in principle – enable the golf club to properly plan and adapt, developing potential replacement golf holes and other facilities, provided this is done to a high standard and with regard to the sensitivities of its location. In light of this we would like to see golf courses – and the coastal change and adaption issues that face them – addressed in the SPD and in any designation of a Coastal Change Management Area, and policies applicable thereto. Specifically, that the ability for a golf course to address the necessary (or in some cases anticipatory) creation of new golf holes or other golf club related facilities, is acknowledged and addressed directly. We believe that such would be appropriate, and in the context of relevant policies relating to coastal change in the National Planning Policy Framework. Please keep me apprised of the SPD's progress, including subsequent stages of consultation.	relation to coastal erosion. The draft SPD provides guidance relating to the rollback and relocation of development, which will be relevant to the rollback and/or relocation of golf course holes.	
Historic England (Andrew Marsh)	Thank you for consulting Historic England on the draft Coastal Adaptation SPD initial consultation document. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. While we do not have the capacity to provide detailed comments at this stage, we wish to flag the following matters which we hope that you'll find helpful. Historic environment The Coastline between Holkham in Norfolk to Felixstowe in Suffolk is rich in heritage, and we consider that the SPD represents an important opportunity to highlight the need to consider historic environment sensitivities when determining future proposals. We suggest the following typologies may be helpful in considering impacts on the historic environment: • Coastal terrestrial - Heritage assets on dry land - built or archaeological - which could be affected by development proposals, e.g. via change in their setting affecting views to and from an asset, lighting, noise, movement, vibration etc; • Intertidal zone - Heritage assets within the intertidal zone. These could be directly impacted, or as before, could	The draft SPD recognises the importance of the historic environment to this part of the Norfolk and Suffolk coast, however, it is considered that guidance relating	The draft SPD recognises the importance of the historic environment along the coast and the important role that Historic England play in conserving the

Respondent	Comment	Partnership Response	Changes Made
	be affected by changes in their settings, for example development in one location resulting in changes to coastal processes affecting heritage assets in another, or as with coastal terrestrial by other factors affecting how they are experienced - for example views to and from, noise, lighting etc. It is also relevant to highlight that there are numerous undesignated heritage assets which are considered of national importance within this zone, but which have not been designated because of the perceived difficulties in preserving and enhancing these in accordance with the statutory duties due to their nature and location. • Marine - Archaeology in and beneath the sea bed, including buried archaeological remains, old land surfaces and the associated palaeoenvironmental evidence that provides information about past climate and environmental changes, as well as artefacts (wrecks or evidence of wrecks). Again, such places could be directly impacted, or as before, could be affected by changes in their settings. Setting of heritage assets The NPPF makes it clear that the setting of heritage assets can contribute to their significance, and in these instances the onus is on applicants to demonstrate that their proposals would not adversely affect these assets via a change in their settings. It is worth stressing that considerations of setting from a historic environment perspective go beyond visual changes (e.g. views to and from a heritage asset), but can encompass anything that affects how an asset is experienced, for example noise, movement, vibration, and lighting etc. In the context of this SPD, this could include unintended consequences to coastal process that result from development in one location, for example increased erosion or deposition etc. which adversely affect heritage assets in another location. On this basis we strongly recommend that the SPD include reference to the importance of setting where this contributes to the significance of heritage assets, and that this be a consideration when assessing development proposals. Other relevant Plans or policies A published East Marine Plan exist (published April 2014) which was the first one completed but it does include a section on coastal adaptation with Policy CC1 and there is also a section on 'Coastal change management' (paragraphs 249-252) - We suggest that it would be helpful if the SPD contained a section highlighting this and any other relevant policy, legislation and guidance which should be referred to be applicants and decision makers. Zoned approach to planning A general matter across all the questions is whether specific action should be taken to consider a zoned approach to planning i.e. in recognition of risks associated with coastal erosion or areas with anticipated increased risk of tidal flooding and therefore what action is necessary to record before loss of heritage assets in those zones - Coastal change Finally it will also be important to consider how matters related to 'coastal change' are considered through planning mechanisms - Conclusions I hope that you find the above comments helpful. We'd like to stress that this response is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise as a result of this plan, where we consider that these would have an adverse effect upon the historic environment. If you have any questions with regards to the comments made	to how the historic environment can be appropriately preserved and enhanced is best addressed in other guidance documents at a local and national level.	historic environment.

Respondent	Comment	Partnership Response	Changes Made
	then please do get back to me. I would be very happy to meet to discuss these comments further. In the meantime we thank you for making us aware of this SPD and look forward to receiving subsequent consultations on this matter.		
Environment Agency (Martin Barrell)	Thank you for consulting us on the Draft Coastal Adaptation Supplementary Planning Document, covering the coast from Holkham in Norfolk to Felixstowe in Suffolk. We support the holistic approach taken in the production of this document. The SPD presents an opportunity to provide consistent advice across the whole of the coast for the area covered. We would agree that the scope and proposed content of the document both look to be appropriate, and the document appears to be consistent with the National Flood and Coastal Erosion Risk Management Strategy. It will be beneficial to have such a document to reference the Shoreline Management Plan policy decisions for each area, particularly as we move into Epoch 2 of the SMPs. For all types of development proposed in CCMA's affected by flood risk, you should consider whether specific guidance needs to be provided on how that risk should be addressed. This may include how to appropriately apply the Sequential Test, and the measures required to ensure the safety of the development over its defined lifetime. This may also be applicable to roll back/relocation proposals, or enabling development. We would be happy to discuss this point further if required. We would welcome the opportunity to further review the SPD as the document is developed.	Appropriate references to SMPs have been made in the SPD and the document considers different kinds of developments and infrastructure and the particular challenges and opportunities that they give rise to. However, the SPD has focussed primarily on risk arising from coastal erosion and as a result does not provide guidance relating to the sequential test.	No change
National Grid Ventures (Alicia Dawson)	National Grid Ventures (NGV) are aware that East Suffolk Council together with Great Yarmouth Borough Council, North Norfolk District Council, the Broads Authority, and the Coastal Partnership East Team are consulting on the Coastal Adaptation Supplementary Planning Document (SPD) from 4th September to 16th October 2020. The SPD will cover the area of coast from Holkham in Norfolk to Felixstowe in Suffolk. East Suffolk Council will be familiar with NGV through our engagement with the Council to date on the proposed Nautilus and EuroLink Interconnector Projects. However, a brief introduction to NGV and our proposals in East Suffolk are	Comment noted.	No change

Respondent	Comment	Partnership Response	Changes Made
	set out under the headings below for the benefit of the other parties hosting this consultation. It is noted that the consultation document sets out the proposed structure of the SPD and that following this current consultation, a draft version of the SPD will be prepared for public consultation before being adopted by all of the partnership authorities. NGV would welcome the future opportunity to review and comment on the draft SPD document once published for public consultation. It is understood that the SPD is intended to provide clear guidance as to what development may be appropriate in the Coastal Change Management Area (CCMA) and in what circumstances. In this context it is relevant to introduce NGV's proposals in East Suffolk.		
Peter Terrington	Whilst erosion is recognised as a threat along the cliff coastline, east of Weybourne, the DLSA does not appear to recognise the threat caused by accretion of sand along the sand dune and marsh coastline, west of Weybourne. Accretion of sand in Wells and Blakeney harbours is creating economic, recreational and environmental impacts. There is strong circumstantial evidence to link the increased rate of accretion of sand in Wells and Blakeney harbours with the commencement of dredging and channel Deepening at Wells and placement of dredged spoil within the marine environment. Increased accretion of sand is also contemporaneous with the development of offshore wind farms and the trenching for cable routes. Obviously natural processes play a huge part in the erosion, transport and deposition of material along the North Norfolk Coast, but little research has been carried out about the part played by human intervention. Observations since 2009 suggest that the rate of accretion of sand has greatly increased. This has had a devastating impact on the mussel fishery at Morston, resulting in the virtual closure of the fishery, putting a number of mussel fishermen out of work. Increased accretion of sand in Wells and Blakeney harbours is also impacting on the offshore fishing industry and the recreational boating interests, as well as impacting on wildlife through the loss of feeding grounds. It is now necessary to regularly dredge inner harbour to keep the channel to the Quay open and around the pontoons at the Main Quay and at Tugboat Yard. Boating interests at Blakeney are seriously investigating the need to dredge Blakeney Harbour. The Wash & North Norfolk Marine Partnership (Formerly the Wash & North Norfolk EMS) has set up a Siltation Working Group to investigate the accelerated accretion of sand along the coastline and in the tidal inlets and it is forming partnerships with other bodies to try to find out why the rate of accretion has dramatically increased over recent years.	The comments are noted but they do not directly relate to the SPD as they relate more specifically to activities in the marine planning realm that potentially impact coastal processes and then therefore impact coastal communities, businesses and the environment. As such, these matters are more appropriately addressed by the relevant Marine Plan and Shoreline	No change

Respondent	Comment	Partnership Response	Changes Made
		Management Plan, as opposed to the development plan and this draft SPD.	
SCEG - Scratby and California Environment Group (Lodge)	Adaption. As much detail to assure public that adaption is explained and as much guidance given as possible.	Relevant detail on adaptation (including links to other guidance) is provided in the draft SPD.	No change
Southwold Town Council (Lesley Beevor)	Main issues are what development is permitted and relocation in case of loss of property due to erosion. Southwold shoreline (Walberswick to Easton Bavents) is shown in Appendix A as having little change to 2055. However the cliff at the end of the northern seawall at Easton Bavents may be breached on a shorter time than that (10-30 years). This opens up quite a large number of properties (~100) in North Southwold and South Reydon to risk from tidal surges. The current CMP policy is to allow a shingle bar to develop, backed up by defence along border of marsh. Given the scale of the problem, and the number of properties potentially affected, the issue perhaps need to be spelt out.	Matters relating to coastal management are for the SMPs to consider, alongside Local Plans, but the SPD cannot directly impact these issues.	No change
Suffolk County Council (AONB Team) (Beverley McClean)	Thank you for consulting the Suffolk Coast & Heaths AONB team on the Draft Coastal Adaptation SPD consultation. The AONB team have the following comments to make on the consultation which we hope can be incorporated into the final SPD. 1 Purpose of the SPD In addition to the objectives identified, the objectives of Coastal Adaptation SPD should also include the following objectives: • Provide guidance for temporary uses of land and buildings. • Set out the approach to relocation of residential properties. • Set out the approach to 'roll back' for commercial uses and essential infrastructure 2. Coastal Change The AONB teams supports the cross boundary integrated approach being proposed for the preparation of the Coastal Adaptation SPD. We would ask that the Coastal Change Chapter includes information on climate change impacts in estuaries and not just the open coast. Estuaries are an integral part of the coastal landscape of the Suffolk Coast & Heaths AONB. These too are dynamic and being impacted as a result of climate change and for this reason they should be included in the SPD. 3. Links to Shoreline Management Plans In addition to linking to SMPS 5, 6, 7 & 8, the SPD should also	The natural environment has been recognised for the significant, in scale and importance, role it plays along the coast and the benefits it provides communities and	No change

Respondent	Comment	Partnership Response	Changes Made
	reference the need for any development affecting or likely to affect the marine environment to have regard to the Marine and Coastal Planning Act 2009, the Marine Policy Statement (2011) and the relevant Marine Plan, in this case, the East Inshore Marine Plan (2014) 4. Proposed content of SPD 4.1 Homes, Businesses, and Communities Affected by Coastal Change The last sentence of paragraph 4.1 should be amended to include estuaries which are also at risk and vulnerable to climate change effects. 4.2 – Coastal Management Measures and Policies This proposed approach is supported. The 2014 Waveney Development and Coastal Change SPD did not reference the Planning Practice Guidance on Coastal Change. This should be referred to under section 4.2 of the emerging SPD. The Suffolk Coast & Heaths AONB Management Plan 2018-2023 is also a material planning consideration and consideration should be given to referencing it under this section of this section of the SPD. 4.3 Development in the Coastal Change Management Area (CCMAs) This section needs introductory text to explain what Coastal Change Management Areas are. We agree that the SPD should cover Permanent and Temporary Development on the coast, Public Realm infrastructure and clarify the requirements for Coastal Vulnerability Assessments. Any guidance should also include estuaries which are also susceptible and at risk from climate change impacts. As the Coastal Adaptation SPD will cover nationally designated landscapes i.e. (the Suffolk Coast & Heaths AONB, The Broads National Park and Heritage Coast) the SPD should highlight the need that all of the developments covered in the SPD will need to satisfy Duty of Regard obligations (Section 85 of CROW Act 2000) to further the purposes of AONB designation. 4.4 Roll back and Relocation Options The AONB support the inclusion of information on roll back and relocation options in the emerging SPD. Given that a proportion of the developments that may need to be relocated /rolled back may well be relocated/rolled back into nationally designated landscapes therefore the need to consider impacts on the natural beauty of the Suffolk Coast & Heaths AONB and The Broads National Park should be included in this section of the document. 5 Delivery and Enabling Development The AONB support the inclusion of information clarifying the circumstances when enabling development may be supported to deliver public benefits. Some enabling development may be delivered in nationally designated landscapes therefore the need to consider impacts on the natural beauty of the Suffolk Coast & Heaths AONB and The Broads National Park should be included in this section of the document. The Natural Beauty and Special Qualities are defined in the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Qualities Indicators Report V1.8 produced in 2016 by Landscape Design Associates Where enabling development is supported to fund new coastal defences for example the design of any defences should consider all impacts on the natural beauty of the Suffolk Coast & Heaths and on the Broads National Park. The AONB team would like to draw your attention to the 'Suffolk Coastal Sea Defences Potential Landscape and Visual Effects Final Report' and its recommendations commissioned by the AONB and prepared by Alison Farmer as part of the Touching the Tide programme. We	businesses along the coast. Reference has been made to the national and local planning policy context, including SMPs, the marine planning system, and of course the role of Natural England. Given the nature of rollback and relocation solutions and the scale of coastal environmental designations the importance of giving appropriate consideration to the natural environment in implementing rollback and relocation development has been recognised in the draft SPD.	

Respondent	Comment	Partnership Response	Changes Made
	recommend that the Final Report and the recommendations in it are used to shape the content of the emerging Coastal Adaptation SPD. We hope these comments are helpful for the development of the Coastal Adaptation SPD.		
Suffolk County Council (Georgia Teague)	Thank you for consulting Suffolk County Council (SCC) on the Coastal Adaptation Supplementary Planning Document. We have no comments to make on the draft document at this time. However, we request to be kept updated and engaged in the later developments of this document.	Comment noted.	No change
Water Management Alliance (Jessica Nobbs)	What are the next steps? What is the scope?	The planned scope of the SPD was set out in the initial consultation document, and since has been updated to take account of consultation responses. The next steps are to publicly consult on the draft SPD, consider the consultation responses, amend the SPD accordingly and seek to adopt the SPD, after which it would become a material consideration in the determination of relevant	No change

Respondent	Comment	Partnership Response	Changes Made
		planning applications.	
Deben Estuary Partnership (Christine Block)	No Comment	N/A	No change
Kathryn Newnham	Having viewed this document I am aware that I lack the expertise on coastal erosion, tides etc and in other areas. However i have an interest and awareness on certain points so I would like to try and contribute to your consultation. For many years now i have been environmentally aware of many issues David Attenborough has recently brought to the peoples attention. Whilst plastic is a big issue (PCBs?) I think they should find an environmentally friendly alternative - I would ban its production for many unnecessary uses, and completely when they find an alternative, I think chemicals and pollution both in the sea and air is a huge factor in climate change, as is destruction of the rainforests. To live todays life style where our factories churn out dangerous pollutants, the seas have fertilisers, petro-chemicals, sewage and goodness knows what else pumped into them everyday, mankind will eventually be responsible for its own demise. Along the way destroying all other forms of life. If everybody used things like environmentally friendly products (I have used them for years) along with natural things (Lemon degreases and is a good limescale remover in kettles, Vinegar etc.) our oceans and atmosphere would improve considerably. So whilst erosion is natural mankind has increased this process dramatically. Sea levels have risen and human activity around out coasts affects tidal movements. One instantly coming to mind is the dredging allowed off our coastline. Usually by companies from elsewhere (I think a company in Southampton applied for and got permission to dredge here!). Surely this must contribute to the erosion? If you remove the shingle (or whatever it is they gather) A process of displacement occurs, and cliffs like those at Happisburgh (who are soft material) disappear into the sea. Along with the houses and roads that used to have "Sea views"! When somebody does something along the coast someone elsewhere becomes a victim. Great Yarmouth outer harbour is a good example when completed caister and I believe it was Hopton lost a considerable amount of beach. I cannot comment for elsewhere in Norfolk and Suffolk only these incidents which I have known of, although i do know Scratby and Hemsby are in trouble with erosion. What i will say is please listen to the experts and people like the Norfolk Wildlife Trust, WWF, etc. local wildlife/environment experts must surely be of great importance with local knowledge of the areas concerned. A further comment on erosion id with regards to the south coast. Prior to moving to Norfolk we used to holiday on the south coast. I have seen swathes of cliff, roads and housing disappear into the sea around Hastings and recently Swanage became a victim of erosion (fortunately nobody was injured). This consultation document for which house	Comments noted. The Councils have consulted a wide range of people and organisations, including the Norfolk Wildlife Trust, Environment Agency, Natural England and many others and is having appropriate regard to their comments. Questions about overall housing numbers and particular planning applications are matters beyond the scope of the SPD, as is offshore	No change

Respondent	Comment	Partnership Response	Changes Made
	building is its main purpose, I would suggest you go back to the government and request a great reduction in quotas. Norfolk and Suffolk are unlike other areas. You have grade one farmland - an important bread basket for our nation - it is wrong to import food when we should be growing our own (not concreting over the farmland with housing). these counties are important to species of wildlife, migrating here in both summer and winter, and our own native species some of which are only found in this area (butterflies etc). This area should be treated differently to other parts of the UK. You cannot allow it to be developed in the same way as Essex, urbanised from London to Southend and the coast. It has the Broads, it is of great importance to the survival of species, you must not let it be a victim of the governments (and all parties) housing policy. In 2019 I wrote to the government ministry of housing and our MP Brandon Lewis as I realised that it was build 1,000s of houses - mostly on green fields - making a healthy profit at everybody else's expense. In January this year I wrote to Boris Johnson enclosing, paperwork relevant to the Great Yarmouth area for planning applications. For some years now we have been the target of developers. Recently this little village of Filby had over 40 planning applications lodged. We already had 60 houses built - it changes villages completely, Filby is being ruined and still they want to build 10-15-30-60 at a time. On Filby sands last year out of season and one way only we had 58,00 vehicles pass our front door. We didn't have the sums to register the summer traffic, it was probably nearer 100,000! your local planning policies have consequences for us residents. Is it fair our quality of life should be ruined to accommodate government housing policy and developers? I have viewed the paperwork on the core strategy and further focused changes for Great Yarmouth. I have returned the statement of representation form and hope the secretary of state's planning inspector will allow me to speak at the hearing sessions because I would like to bring to his attention how the Part 2 further focused changes to 2030 came into being, to accommodate large developments. Persimmon Homes 725 (now slightly less) but the design is such that you can remove a few trees and build on the rest of Nova Scotia Farm. this was not an area in the sites for development - it is now - put so the developer could build freely without objection from the public! That's another 2,000 plus cars a day go come through Filby on the A1064 and on the Norwich. Bradwell 600 dwellings, Gorleston 500 and another 11 dwellings - all coming under ADIA numbers 1- 9 and other under BR, GR6, HY1 and 071. These are listed in the further focused changes - however i found in other files what can be done! Rollesby site 36 - 15 units site 37 -40 units, site 90 1 unit, Site 9 - 4 units, site 320 - 10 units, site 322 - units, site 413 - 26 units, site 414 - 20 units, site 449 - 20 units. Filby site 10 - 60 units (they have an application in now for six 'gone to appeal' as it was refused planning). site 19 - 15 units, site 38 - 11 units, site 62 - 3 units, site 71 - 6 units, site 72 - 20 units, site 83 - 2 units, site 114 - 7 units, site 416 - 44 units, site 428 - 20 units. Some of these sites now have planning applications lodged! Additionally Martham and Ormesby St Margaret have been swamped with development applications as has Hemsby regardless of coastal erosion. I would suggest this is not a council with a local planning policy with	dredging. However, the SPD will provide guidance to help manage development and rollback/relocation in coastal areas.	

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	the interest of the community at heart, but a council allowing developers access everywhere. For the future generations and nature you need to go back to the government and insist on a change to the building requirements issued for Norfolk and Suffolk - disobey them if necessary and stand up for the communities and future generations you will serve. Counties of concrete in an environmentally important area with the prospect of houses disappearing into the sea (Happisburgh and shortly it will be Hemsby) is a very stupid housing policy - not forgetting what the rest of us will lose. I hope my comments will make you think seriously at the housing policies you will be providing guidance on. I also ask that despite my opinions you will include me in any further correspondence on these policies. I also enclose some cuttings recently taken from the mercury about new housing applications, the volume may make you think about what is going on here. I have kept Filby paperwork as I use it to write to the council with my objection.		
Richard Adams	Reference Eyke 21, East Suffolk Council SCLP 12.50 - as I own the south east fence of the mixed use boundaries. - What are your plans for this issue?	The draft SPD is focussed on providing guidance for the implementation of coastal adaptation Local Plan policies, and does not provide guidance for other site allocations.	No change
Anglian Water Services Ltd (Stewart Patience)	No Comment	N/A	No change
Barton Willmore (Will Spencer)	No Comment	N/A	No change
Bidwells (Kate Hammond)	Please do not rule out coastal defence maintenance and improvements. This could be cheaper in the long run! We recommend there is working group established to include landowners to assist with the development of this document and provide more detail and explanation of the issues which are facing property owners and	The management approach to the coast (e.g. protect/hold the	No change

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	businesses in coastal areas. If you would like to discuss any of these points further please do not hesitate to contact us.	line, no active intervention etc) is set out in the Shoreline Management Plans, and the SPD cannot change this. The local authorities are undertaking work for potential new protection schemes (at Hemsby, for example) and in some cases, rollback will not be the preferred solution.	
Bourne Leisure Ltd (Lichfields)	The coastline covered by the SPD supports a tourism economy of regional importance. In Great Yarmouth alone, where Bourne Leisure has its holiday parks, tourism is worth £625 million per annum and accounts for 35% of all jobs. It is important that existing holiday parks in coastal locations are assisted by policy and guidance to ensure they can respond to circumstances, including coastal change, to maintain a quality service to their guests, continue attracting visitors and contributing to the local tourism economy, and to give operators confidence to plan for the future of their parks. This needs to be acknowledged in the opening section of the SPD, to establish this important context. Principally, Bourne Leisure has four other key points that it requests are considered by the Councils in preparing the Coastal Adaption SPD. These are addressed in turn below. 1. Identify caravan holiday parks as being appropriate in coastal locations We note that the proposed content for the SPD includes a section on development in the Coastal Change Management Area (CCMA). Pg 2/3 18907555v2 We responded to the Great Yarmouth Local Plan Part 2 review recently in May 2020. The draft document has been submitted by	The importance of camping and caravan parks to the coastal economy is fully recognised by the Partnership. The draft SPD follows policy in providing that	No change

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	the Council for Examination and includes a specific policy (GSP4, 'New Development in Coastal Change Management Areas') that identifies a CCMA and development considered appropriate within the area. This approach is consistent with National Planning Policy Framework guidance (NPPF, paragraph 167). In the Great Yarmouth example, parts of Caister-on-Sea and Hopton Holiday Parks are located within the CCMA and Seashore Holiday Park is directly adjacent to the CCMA. We endorsed the draft policy identifying holiday and short-let caravans as representing appropriate development that could be provided along the coastal strip in Great Yarmouth. This form of tourist accommodation and use of land by its nature is inherently more flexible, with the ability to easily relocate caravans and adapt caravan developments to respond to changing coastlines over time. In view of this, park operators may accept temporary planning permissions that allows development to be reviewed in light of the actual rate of coastal change. In this way, it is different from other forms of 'permanent' development, such as residential development, and it is appropriate that this is recognised in development plan policy and guidance in the Coastal Adaption SPD. 2. Allow operators to protect their properties from coastal erosion Tourism operators should be allowed to protect their properties by investing in maintaining existing flood defences or providing new defences. This way private landowners are not dependent on public sector plans and investment to provide new or improved coastal defences, and initiatives can be led and funded by the private sector, as required and appropriate. We consider this principle should apply even in circumstances where such flood defence works are not provided for in Shoreline Management Plans (SMP). Otherwise this could mean that essential, urgent coastal protection works are delayed, potentially for a significant period, until the SMP has been updated, which in reality could take years. In such cases, the planning application proposal for the flood protection works would need to be justified and demonstrate that there would be no unacceptable adverse impacts further along the coastline. They would also need to be in general accordance with the development plan, SMP principles and SPD guidance. The application would be consulted on through the statutory planning application processes, including engaging with affected landowners, the Environment Agency, and Suffolk coastal authorities if necessary. This way all relevant responses can be considered before a decision is made. This process will be more expedient than reviewing the SMP. 3. Promote "roll-back" and relocation Whilst coastal defences play an important part in responding to coastal erosion, they are sometimes impractical or unviable. This is where the second strand of NPPF paragraph 167 provides a solution for development and infrastructure that is at risk, by making provision for these to be relocated away from CCMA's. Many coastal planning authorities adopt so-called "roll-back" policies as part of their development plans to proactively manage the hazard of coastal erosion. Indeed, Great Yarmouth Council in its Local Plan Part 2 review includes a draft policy (Policy E2 'Relocation from Coastal Change Management Areas') aimed at delivering this objective. The ability to replace existing tourism accommodation and associated facilities and/or relocate these to sites at	temporary development may be appropriate in the CCMA provided a number of criteria are met, including that such temporary development proposals are supported by a compliant Coastal Erosion Vulnerability Assessment. The SPD cannot create or change policy in the coastal area – this is reserved for Shoreline Management Plans and Local Plans. However, the SPD will provide assistance in the interpretation and implementation of relevant Local	

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	less risk from coastal erosion either within or outside CCMA's as necessary is critical to helping secure the future of holiday parks and ensuring that the social and economic benefits generated by these developments are not lost. Pg 3/3 18907555v2. We are encouraged that the proposed content for the SPD includes a section on roll-back and relocation options. 4. Consider the SMP in the context of other relevant statutory policy documents We mentioned in (2) above an example when there may be a need to depart from the SMP guidance, and there could be other instances when circumstances dictate this needs to happen. Whilst the SMP provides an important starting point, it is a non-statutory policy document that focuses on coastal defence management planning, rather than having to address the wider social and economic consequences of the intervention categories. Further, SMPs are generally updated very infrequently, often not as frequently as Development Plan documents, and can therefore be out of sync with up-to-date development policies and local development priorities. The example of Great Yarmouth is a case in point. The Borough Council is reviewing its Local Plan, which is at an advanced stage of the review process and is likely to be adopted next year. The current SMP was adopted over 8 years ago, in August 2012, without wider public and landowner engagement. The guidance in the Coastal Adaption SPD needs to reflect the current development priorities for the area and provide flexibility for landowners to protect their interests (including business, jobs, etc for the local economy), where this is possible without unacceptable adverse impacts further along the coastline. It should place statutory development plan policies at the heart of the coastal adaption strategy; informed by the SMP but with this being considered in the overall balance of objectives for the coastal areas. In future, the SMP must be consulted upon publicly prior to it being published, in the same way that draft development plans are, so that those affected by the coastal defence management policies are given the opportunity to comment. We trust this representation is clear and will be considered in formulating a draft of the Coastal Adaption SPD. Please do not hesitate to contact me or my colleague should you require any clarification of the points made. We would be grateful if you could keep us informed of progress on reviewing the SPD.	Plan policies and there have been a number of good case studies in recent years showing how councils can work with park operators to best manage coastal erosion threats. Ad hoc coastal defence works must be considered in light of the SMP policy due to the potential for unintended consequences on other parts of the coast.	
Michael Boon	I consider that it is wise for the local authorities who have coastal responsibilities to take a long holistic approach of the coastline as their boundaries on the coast will not align with the specific coastal problems within Shoreline Management compartments. It is essential for the economic well-being of the coastal communities that local authorities tried to maximise the practical needs of villages and settlements within their areas affected by coastal erosion. It is wise to have forward planning on each of the designated SMP coastal compartments as change is accelerating and measures to address this will affect the landward community. It's also necessary to have adaptability in any forward plan to cater for accelerating change caused by significant increased coastal erosion in places and longer-term problems which would be driven by climate change A properly prepared and	Shoreline Management Plans make the decisions on the management of the coast and cover wide areas (based largely on	No change

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	flexible coastal adaption planning document can be a significant source of information for both residents and developers and can link into each Local Authority's development plans having regard for the Shoreline Management Plans overarching frontal role. It is essential that the Local Authorities planning roles addresses the fact of the impact of coastal change in erosion in the context of significant flood protection change to the lands which lie within its area which might suffer in the event of frontal collapse. The Local Authorities should require evidence to support the economic case where necessary to be made to government to support protection of coastal communities threatened by erosion of the frontal defences 2 Coastal Change is an inevitable part of a dynamic coastline. This presents a challenge in planning for the appropriate management of our coastlines. The risk of coastal flooding and vulnerability to erosion along the coast does not respect Local Planning Authority boundaries, and therefore coastal change needs to be considered across a wide geography. There are significant potential benefits to joint working across administrative and professional disciplines in addressing the issues of coastal management and planning. 3 Links to Shoreline Management Plans (SMPs) I believe that Shoreline Management Plans ,broken into compartments in Norfolk and Suffolk with continual monitoring, are essential organisations to provide early warning on coastal change which might need remedy by defence . The type of defence needed will vary according to the landscape of the shoreline and the type of tidal attack experienced. The Shoreline Management Group needs to be able to take advantage of the latest research available and have access to coastline modelling to be able to work with the Flood Defence Authority in providing coastal defence. Contact with the University of East Anglia may be valuable in this context. Each of the compartments in the eastern and western halves of SMP's could have different needs. It is important to take a broad view of the coastline when installing any coastal defences to consider whether a length of defence would have an adverse effect on a compartment immediately downstream. This would argue for compartments being looked at not only for their own needs but for those adjacent to them. I comment further on some examples in an appendix to my response. 4 Proposed Content of the SPD 1. Context: Homes, Businesses, and Communities Affected by Coastal Change A balanced policy of funded protection if it is available, consideration of moving landward sites and managed retreat in the context of increased tidal surges and climate change will need to be considered. 2. Coastal Management Measures and Policies A collection of both local and national powers may well be needed to be melded to protect the coast and to make the case for funding if a single set of powers locally does not qualify the obtaining of funds for necessary needs. 3. Development in the Coastal Change Management Area Within the Coastal Change Management Area, the current baseline of areas, likely to be subject to physical change of the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion, must be kept up-to-date along the eastern and western Shoreline Management Areas. Trends leading to vulnerability need to be monitored. Consultation after assessment would need to be made on a rolling basis between coastal	self-contained sediment 'cells') and much of the information provided is beyond the powers of the SPD to take into account (which cannot create new policy or management approach to the coast). However, an understanding of the coastal processes along this part of the Norfolk and Suffolk coast, as well as the relationship between the SPD and the SMPs is set out in the draft SPD.	

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	Local Authorities and the Shoreline Management Organisation to come up with a joint view in all areas, after full consideration, to negotiate with the environment agency. Vulnerable areas in a time of increasing tidal surges should be identified and the best practice of managing an appropriate coastal defence when necessary needs to be explored on a cost benefit basis. 4. Roll-back and Relocation Options Roll-back and relocation involves the movement of assets currently or soon to be at risk from coastal change Significant assets such as lighthouses at Happisburgh and Orford or Martello Towers along the coast would be key targets for assessment of the movement to less vulnerable locations. Other examples might be coastal holiday cottages now too close to the coastline, cliffside car parks which is now which are now dangerous to use and holiday villages which need a landward relocation owing to the vulnerability of cliffs. 5. Delivery and Enabling Development With adequate information on the future stability of the coastline areas within the Shoreline Management Program developers would have enough information to decide whether investment for the benefit of the local communities is cost-effective. There could be cases where a developer would be prepared to contribute to sea defence to protect an investment which could be a valuable joint scheme in securing the protection of certain coastal areas. In other parts of the coastline it may be that managed retreat is the only practical policy because any other consideration would not be effective Appendix comments on individual schemes of coastal defence which the local authorities concerned would need to take into account in considering their planning policies relating to the adjacent land I understand that the scope of the document covers the coast from Holkham in Norfolk to Felixstowe in Suffolk and that the coastal zones in Shoreline Management terms are in the provinces of an Eastern and Western area. I also understand that the draft document when finalised will be used in the determination of planning applications within the coastal zone and will be updated on the basis of changes in the coastal regime and climate change. The various compartments into which into which the coastal zone has been divided between Holkham and Felixstowe are very different ranging from high cliffs, flat beaches backed by dunes, low cliffs, a beach dune landscape and river exits to the sea. A policy developed some years ago of protection of certain compartments of the coastal frontage based on the value of development behind the coast has had to be modified in the changing climatic conditions particularly after the storms of the last few winters. The complexity of a policy which ranges from hold the line to managed retreat is constantly being needed to be reviewed as tidal attack on the frontage becomes more severe and the effects of climate change become more apparent. The varying types of coastline within the area being reviewed does not respect existing administrative boundaries and this means that there needs to be cooperation between the responsible planning authorities who may have more than one type of coast within their administrative areas. This provokes the need for joint working but equally invites the local authorities to be consulted in the type of frontal defence being recommended by the flood defence authority. In the past there has been too much piecemeal defence on vulnerable sections of the		

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	coast and it is evident that a protection scheme of a particular type might be desirable for a short section of the coast but inevitably has a downstream effect on other sections of the coast which are not similarly protected. Vast quantities of sand are moved down the coast by the tide and there is a complex arrangement between the coast and the offshore banks which makes prediction of erosion and the position more difficult without the assistance of complex hydraulic models. There have been occasions in the past where sections of coastline needing protection have been addressed by flood protection structures utilised elsewhere in the country and it has been found at a later date that a particular type of scheme which suits one area of coast is not wholly efficient on another. I would cite in this respect the fishtail groynes utilised in the Happisburgh to Winterton early scheme which were of a similar type to that used in Jaywick in Essex. The two areas needing protection on the landward side are very different with the flatter coastline at Jaywick, which suffered considerably in the 1953 floods ,giving rise to the need to protect the small holiday resort from a sea ingress into lengthy marshes behind the coast. The coastal regime between Happisburgh and Winterton is that of low cliffs which are very subject to erosion and whereas sand can be trapped in the fishtails in the immediate locality beyond the southern extremity of the other fishtail groyne's erosion would bite in the coastal compartment beyond. I do not believe that the Happisburgh to Winterton scheme was hydraulically modelled to any extent but was based on practical experience of the use of fishtail groins elsewhere. With the coastline between Holkham and Felixstowe now even more under frontal attack a broad hydraulic model which could be broken down into compartments would be highly desirable if one exists. It may well exist but it has the need of being updated with options, especially those arising from storm surges which now occur far more frequently than in the assessed 1 in 200 critical baselines to provide a satisfactory defence in the current circumstances and for the future. When the Rivers Authority was responsible for both land drainage and flood defence ,and many of the Board's members had agricultural interests, it was anathema to talk of any retreat from the frontal defences or utilisation of flood overspill areas since defence itself was the main object at that time. Thus, the wide discussion of using the Haddiscoe Island marshland area above Breydon water to act as a mirror image flood overspill area for Great Yarmouth and the surrounding area was not proceeded with. The option lies on the table still. Times have changed now; tides are higher and it is more difficult to use the same criteria in developing frontal defences. Climate change has led to an evaluation of the value of land behind the coastal defences which has become the criteria for obtaining capital funds for frontal defence. Marshes at a low land level have been candidates for managed retreat which also has environmental benefits for birdlife and ecology. Coastal settlements on the top of low cliffs in areas such as Happisburgh, Winterton, Hemsby and Scratby with scattered dwellings close to the clifftops now struggle to meet the criteria to obtain appropriate funding for their coastal defence. There are of course wider considerations in the area. Perhaps that of Horsey where the defences of a series of low dunes are		

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	held together by marram grass. The area was over- topped in the 1953 floods with a considerable ingress of the sea across the marshes well inland. That flood surge, together with that of 1912, needs to be held in the memory in the present situation of sea-level rise and climate change. The Hundred Stream which is currently truncated behind the dune level originally reached the sea in the mediaeval past as a branch of the river Thurne. Salt ingress under the dunes in this area penetrates down the channel in the time of tidal surges and take some years to disappear from the landscape . In a period of sea-level rise and more frequent tidal surges if the dune wall was breached in this area again the sea ingress could run towards Potter Heigham. The North beach at Great Yarmouth would appear on most occasions to be stable and held together by Marram grass in the dunes but it is noted that in severe storms in the last winter the sea surge ran as far as the promenade wall again overtopping much of the beach. I was the architect of Great Yarmouth Outer Harbour scheme which was model tested both at the Hydraulic Research Station in Wallingford and also the Delft Hydraulics Laboratory in the Netherlands. Extensive studies were carried out to see what the effect would be downstream and I was satisfied at the time that Gorleston Beach would accrete. This has proved to be the case. However, at the very far end of the Gorleston promenade, where lesser sand had accumulated in the historic past this remains the case. The vulnerability of the cliffs at Hopton and Corton arises from a lack of offshore sandbanks to prevent direct wave attack from the East. I think it will be necessary in the future to provide some further sea defence for the Outer Harbour offshore of the entrance to the port as my original design, hydraulically tested provided for an overlapping breakwater to the North. Another solution would be to place in the future an offshore breakwater in deeper water clear of the entrance protecting the entrance itself, such as at Dover, which would both assist navigation and also act as a sea defence from storm waves from the East over the offshore banks. Within the river port of Great Yarmouth itself I often conducted joint schemes with the then flood authority which was Anglian Water. The joint schemes involved the third when the Port Authority wished to re-pile its quays with sheet steel piling. On these occasions an additional height to protect the land behind the quays was contributed to by the flood defence authority thus benefiting both organisations. In terms of local authority planning I remain concerned about the protection given to the West bank of the river within the tidal River Yare at Gorleston and Southtown. The river frontal defences are not high and the land behind the quays is generally low lying. Great Yarmouth is at risk to a local effect here in that in surge tide conditions one flood tide can be succeeded with another on top of it without a significant ebb. This can result in overtopping of the defences in Gorleston and there is a strong possibility of outflanking the frontal defences by ingress of high tides along Riverside Road putting the lower part of Gorleston at risk. This certainly needs to be addressed at Local Authority planning level in considering the interaction between adequate defence and protection of existing businesses. I noted that during the recent in Inspector's Examination in Public of the proposal for a Third River Crossing of the		

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	River Yare in Southtown at Great Yarmouth the question of the constraint on tidal flows of the river resulting from the projected bridge piers built into the river bed but was raised. It was admitted by the Norfolk County Council, the schemes proposers', that the tidal flow would be reduced by 36% because of the structure within the river. This of course would add to the inability of a surge tide to pass this point and the backing up of the incoming tide would exacerbate the potential flooding in lower Gorleston over the flood defences. Further to the south areas such as that of Covehithe are historically extremely vulnerable in that the high soft cliffs are retreating rapidly inland. I suppose this would be considered an area which would not warrant investment to protect further cliff collapses on grounds of economic assessment. However, in the north of the eastern compartment the cliffs in areas such as Cromer, Sheringham, Overstrand and Trimmingham are vulnerable to water weight retained in the land at the top of the cliff which can cause unexpected collapses. Significant collapses of this type can also be seen elsewhere in the country such as at the cliffs of Burton Bradstock immediately north of West Bay in Dorset. In a period of increasing rainfall, I wonder is possible to provide some piped draining through these cliffs both to stabilise and to prevent the risk of such heavy collapses. Finally, I turned to the protection provided for the nationally important gas terminal at Bacton by sand feeding. I noted that the recommendation was made by Dutch contractors. During the development stage of planning the Outer Harbour I looked at the coastal reclamation scheme which was the brainchild of Ronald Waterman a Dutch engineer and specialist in coastal hydraulics. I arranged for him to come over to Norfolk and he gave a presentation on his scheme for reclamation in the Netherlands which had envisaged protection of the coastal zone zones stretching from Hoek van Holland to Scheveningen, the extension of the Port of Rotterdam in the Maasvlakte, and also near the extension to the ports of IJmuiden/Amsterdam. The alignment of the Netherlands coast is broadly north-west to south-east whereas that in Norfolk is convex. Dr Waterman was asked at the time, and this was back in the 1980's, whether a similar scheme for coastal defence could be applied in Norfolk. He made the comment of the different shapes of coastline between the Netherlands and Norfolk and cited the effect on movements of sand. The sand feeding of vast quantities of sand in front of Bacton may well provide temporary relief for the terminal but as has been recently seen the sand can be heavily mobile and has been carried south in recent storms into Sea Palling. Further investigation I feel is needed here for the long-term stability of this stretch of coastline.		
Norfolk Constabulary	I have asked NPS Group to send a reply for and on behalf of both Norfolk Constabulary and Suffolk Constabulary.	Comment noted.	No change
RSPB (Ian Robinson)	The scale of change predicted for the coast is immense. Conservation organisations have or are developing landscape-based proposals – RSPB Priority Landscape plans, Wildlife Trust Living Landscape plans. These plans look at integrating and expanding management for nature in accordance with the Lawton principle i.e. bigger,	The draft SPD recognises the importance of	No change

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	better and more connected. Integral to this land management and habitat connectivity is the need to connect people with nature and enable access to existing and 'newly created' countryside. Guidance must be available to developers on how best to create access without diminishing the value of the landscape i.e. creating access routes within an area, which fragment that area and discourage wildlife from making best use of the landscape.	protecting and enhancing the natural environment as well as providing public access to the coast and the countryside, particularly in relation to rollback and relocation development.	
Natural England (Victoria Wight)	Objectives, page 1. It is important that objectives are long term, sustainable and have positive outcomes for coastal communities, land and property owners, but also nature and environment. Coastal management can provide opportunities for natural capital and ecosystem services which contribute to erosion and flood risk reduction, as well as adaptation for local communities. Section 3. We recommend that this Supplementary Planning Document (SPD) is informed by the ongoing Shoreline Management Plan (SMP) review and that relevant changes are taken into account. Marine plans should also be considered and further information can be found here. Section 4, point 1. We suggest the creation and implementation of a strategic communication plan to facilitate engagement with communities vulnerable to coastal change. This could be used to raise awareness by de-mystifying coastal change and explaining coastal process. Section 4, point 3. Development in the Coastal Change Management Area. This could also be providing guidance as to appropriate development that could impact on wildlife interests, especially (but not limited to) protected sites, which are vulnerable to human disturbance, coastal erosion and other climate-change influenced impacts. This is also highlighted in the shared aims of the Statement of Common Ground in Coastal Zone Planning for the Norfolk & Suffolk Coastal Authorities (Appendix 1, page 8) which states "to protect the coastal environment, including nature conservation designations and biodiversity". Section 4, point 4. There needs to be a cultural change in how coastal adaptation is perceived, roll-back can be seen in a negative light however it is important to demonstrate how it can be a positive adaptive measure. As stated previously, coastal management can provide opportunities for natural capital and ecosystem services which contribute to erosion and flood risk reduction, as well as adaptation for local communities. Opportunities should be sought to explore habitat enhancement and creation through	The draft SPD recognises the importance of the natural environment to people, communities and businesses. The draft SPD provides guidance concerning the relationship between the SMP, Local Plan policies, Marine Plans, national policy and various other policy and	No change

Respondent	Comment	Partnership Response	Changes Made
	coastal adaptation, to make space for nature and to provide room for the coast to function, so that 'if we help it, it will help us'. Coastal flooding and erosion management could also be used to aid nature recovery and this is something that Natural England are keen to explore with Coast Partnership East and would welcome a conversation over the coming months. Section 5. The SPD, in conjunction with the relevant SMP's may be able to provide a strong steer and presumption against any development that increases flood and erosion risk to people, and in turn put pressure on wildlife sites and coastal processes.	guidance documents. The draft SPD focusses primarily on coastal change resulting from erosion of the coast rather than flood risk. However, flood risk is of course a significant issue in many coastal locations.	
North Norfolk District Council (Planning Policy Team)	Thank you for the opportunity to comment on the initial consultation documentation associated with the production of a joint Coastal Adaptation SPD. Please find our below an Officer level response. The emerging North Norfolk Local Plan has two coastal policies, SD11: Coastal Erosion and Policy SD 12: Coastal Adaptation, which are currently being finalised ahead of Regulation 19. As a Coast Protection Authority, involved in the creation of the SPD, we wish to offer our full support in providing a joint document that will support and inform our emerging coastal policies. For NNDC, it is particularly important that the joint SPD should usefully address: - clearly set out the national and strategic frameworks and the Local Plan Policies that influence coastal change along the coastline, as well as informing which and how different organisations are involved and how their roles and responsibilities interconnect; - give full explanations of the coastal terms used, for example, coastal erosion, coastal adaptation; - explain what types of temporary development would be appropriate within the 50 year and 100 year epochs of the areas designated as Coastal Change Management Areas; - inform what is the required content for a Coastal Erosion Vulnerability Assessment, giving proportionate examples/ template;	Support noted. The draft SPD provides a policy context section that sets out the various national and local policy and guidance documents relevant to coastal adaptation, ranging from Local Plan policies to marine planning and SMPs. This chapter is supported by an	No change

Respondent	Comment	Partnership Response	Changes Made
	- give further guidance on the protection and replacement of coastal infrastructure; (such as roads) - provide case studies for each area covered from our collective authorities, such as the innovative sandscaping scheme at Bacton, but also use examples from further afield, both nationally and internationally; - as part of the roll back/ relocation options, set out the likely requirements with regard to mitigation and how planning conditions and legal agreements should be used to ensure biodiversity/ environmental net gain.	appendix that sets out the roles and responsibilities of organisations acting on the coast. The draft SPD is supported by a glossary which provides definitions for key terms, and the draft SPD has also be written in plain English to ensure it is accessible to as many people as possible. The circumstances when temporary development would be appropriate within the CCMA and requirements relating to the preparation of a Coastal Erosion Vulnerability Assessment are	

Respondent	Comment	Partnership Response	Changes Made
		set out in the draft SPD. The draft SPD also contains guidance relating to the implementation of rollback and relocation policies, and is supported by a number of coastal adaptation best practice case studies.	
Holkham Estate (Peter Mitchell)	I support the approach and have no suggestions to make which would improve it. My concern is that, going forward, Holkham Estate is included in subsequent stages of this project – in the development of the full SPD draft and in particular the criteria around enabling developments. It is a concern that studies needed to firm up the Conditional Policies in SMP5 remain outstanding as these are key to the long-term planning that is so important to owners of low-lying land on the coast.	Whilst the SPD cannot alter SMP policy, developing workable guidance on enabling development forms part of the draft SPD.	No change

Strategic Environmental Assessment Screening Opinion

Coastal Adaptation Supplementary Planning Document

October 2022



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1. Introduction

In some circumstances a Supplementary Planning Document (SPD) could have significant environmental effects and may fall within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 and so require Strategic Environmental Assessment.

This screening report is designed to test whether or not the contents of the Coastal Adaptation Supplementary Planning Document requires a full Strategic Environmental Assessment (SEA). The legislative background below outlines the regulations that require the use of this screening exercise. Section 4 provides a screening assessment of the likely significant effects of the SPD and the need for a full SEA.

The Coastal Adaptation Supplementary Planning Document (SPD) is being prepared by a partnership of East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority, and the shared Coastal Partnership East team. The purpose of the SPD is to provide guidance on aligned policy approaches along the coast. The SPD follows on from the Statement of Common Ground on Coastal Zone Planning agreed between the partnership authorities in September 2018. The SPD will ensure planning guidance is up to date, aid the interpretation and delivery of planning policy, and provide case study examples of coastal adaptation best practice.

2. Legislative Background

The basis for Strategic Environmental Assessment legislation is European Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the Environment'. This document is also known as the Strategic Environmental Assessment (or SEA) Directive. European Directive 2001/42/EC was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended, including through EU Exit legislation).

The SEA Regulations include a definition of 'plans and programmes' to which the regulations apply. SEA requirements relate to plans or programmes which are subject to preparation or adoption by an authority at national, regional or local level, which includes those prepared for town and country planning and

land use. SEA is required where the plan or programme is likely to have significant environmental effects. It is therefore necessary to screen the SPD to identify whether significant environmental effects are likely. Where screening identifies significant environmental effects, a full Strategic Environmental Assessment is required.

3. Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC

The preparation of the SPD triggers a requirement to determine whether it is likely to have a significant environmental effect. This requirement is discharged by the 'responsible authority' being the authority by which or on whose behalf the plan is prepared¹. Before making a determination, the responsible authority shall: -

- a) Take into account the criteria specified in Schedule 1 to the Regulations;
and
- b) Consult the consultation bodies.

The consultation bodies are defined in section 4 of the SEA Regulations. The opinions from the statutory consultation bodies: Historic England, the Environment Agency and Natural England, are therefore to be taken into account.

Schedule 1 of the SEA Regulations sets out the criteria for determining likely significant effects as follows:

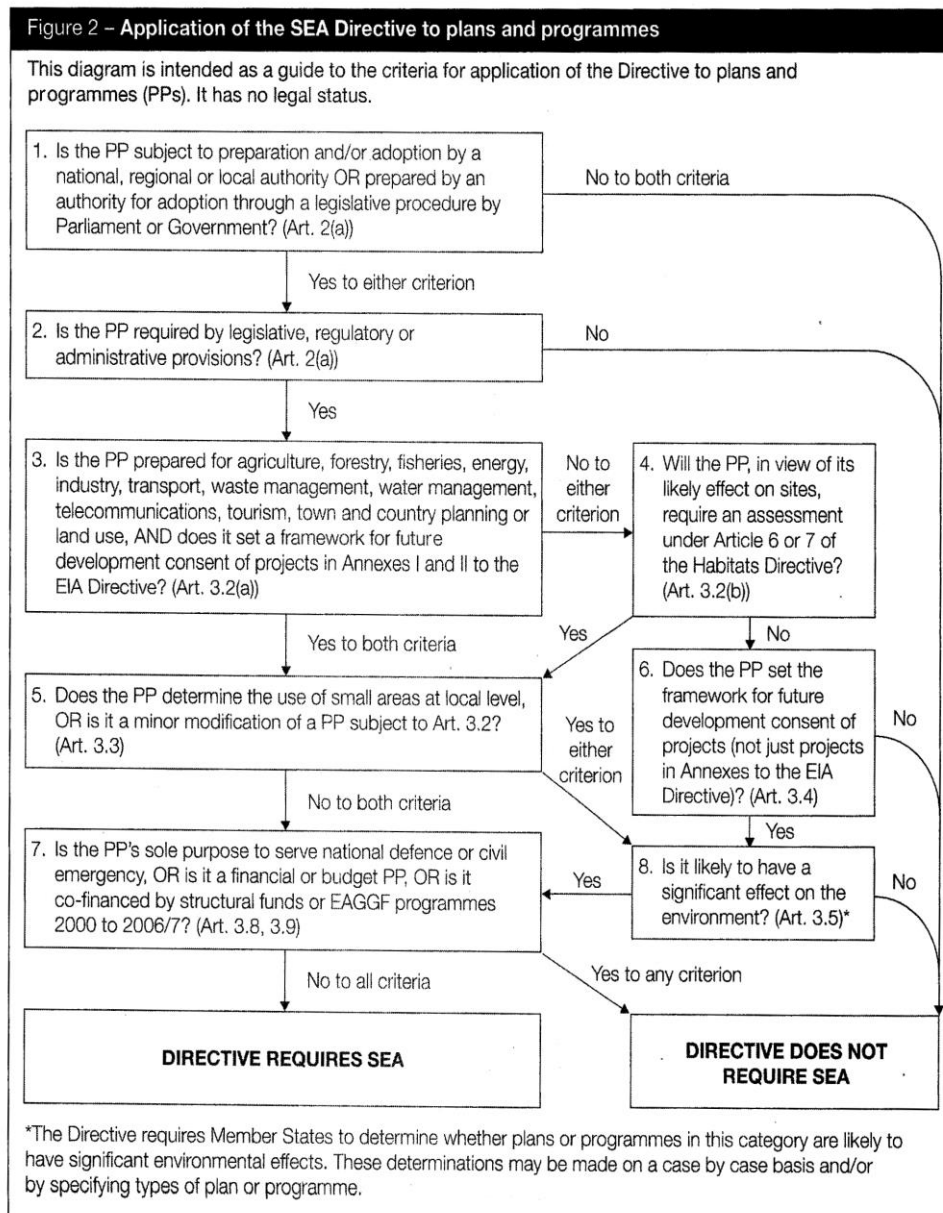
- 1. The characteristics of plans and programmes, having regards, in particular to:
 - a. The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.
 - b. The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.

¹ The responsible authorities in this case are: East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, and The Broads Authority.

- c. The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.
 - d. Environmental problems relevant to the plan or programme.
 - e. The relevance of the plan or programme for the implementation of community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:
- a. The probability, duration, frequency and reversibility of the effects.
 - b. The cumulative nature of the effects.
 - c. The trans boundary nature of the effects.
 - d. The risks to human health or the environment (e.g. due to accidents).
 - e. The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
 - f. the value and vulnerability of the area likely to be affected due to:
 - i. special natural characteristics or cultural heritage;
 - ii. exceeded environmental quality standards or limit values;
 - iii. intensive land-use; and
 - g. the effects on areas or landscapes which have a recognised national, community or international protection status.

4. Assessment

The diagram below illustrates the process for screening a planning document to ascertain whether a full SEA is required.



Source: *A Practical Guide to the Strategic Environmental Assessment Directive* (2005)

The following assessment applies the questions from the preceding diagram. The answers determine whether the SPD will require a full Strategic Environmental Assessment.

1. Is the PP subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))

Yes. The preparation and adoption of the SPD is being carried out by a partnership of East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority, and the shared Coastal Partnership East team. The SPD is being produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))

Yes. Although producing the SPD is optional, the production of the SPD forms part of the delivery of the statutory Development Plan and the process for preparing SPDs is set out in the Town and Country Planning (Local Development) (England) Regulations 2012 and relates to the administration of the Council's planning service.

3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))

The SPD is prepared in support of the delivery town and country planning and land use policies.

The SPD will not set a framework for the future consent of projects listed in Annexes I and II of the EIA Directive.

4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))

A separate screening exercise has been carried out under the Habitats Directive (92/43/EEC) and Conservation of Habitats and Species Regulations (2017) (as amended). This has determined that a full Appropriate Assessment is not required.

5. Does the PP determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)

Not applicable (based on the responses to questions 3 and 4 above).

6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3(4))

Yes. The SPD will be a material consideration in the determination of planning applications and will be applied alongside the policy framework provided by the Local Plans.

7. Is the PP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)

No. Not applicable.

8. Is it likely to have a significant effect on the environment? (Art. 3(5))

No. The Coastal Adaptation Supplementary Planning Document (SPD) is being prepared by a partnership of East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority, and the shared Coastal Partnership East team. The purpose of the SPD is to provide guidance on aligned policy approaches along the coast. The SPD follows on from the Statement of Common Ground on Coastal Zone Planning agreed between the partnership authorities in September 2018. The SPD will ensure planning guidance is up to date, aid the interpretation and delivery of planning policy, and provide case study examples of coastal adaptation best practice. It is unlikely that the SPD will have a significant impact upon the environment. All policies within the relevant Local Plans have been subject to a full Sustainability Appraisal, incorporating the requirements for Strategic Environmental Assessment.

5. Conclusion

The Coastal Adaptation Supplementary Planning Document seeks to reflect and implement policies in Local Plans across the SPD partnership area (East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority) which have both been subject to Sustainability Appraisal including Strategic Environmental Assessment.

It is considered by the SPD partners (East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority, and the shared Coastal Partnership East team) that it is not necessary for a Strategic Environmental

Assessment to be undertaken of the SPD to ensure compliance with SEA legislation. This view has been supported by the statutory consultation bodies (see Appendix 1 for responses).

Signed:

Dated: 26 October 2022



Iain Withington
Planning Policy Team Leader
North Norfolk District Council

Signed:

Dated: 21 October 2022



Andrea McMillan
Planning Manager - Policy, Delivery and Specialist Services
East Suffolk Council

Signed:

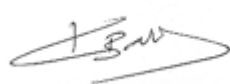
Dated: 31 October 2022



Marie-Pierre Tighe
Director of Strategic Services
The Broads Authority

Signed:

Dated: 31 October 2022



Kim Balls
Principal Strategic Planner
Great Yarmouth Borough Council

Appendix 1: Responses from Statutory Consultees

Environment Agency Response

From: Ipswich, Planning <[REDACTED]>
Sent on: Friday, September 9, 2022 1:24:08 PM
To: Laura Mundy <[REDACTED]>
Subject: FW: SEA Screening Coastal Adaptation Supplementary Planning Document

Good afternoon,

Thank you for the below consultation. As the SPD does not look to create new policy we do not disagree with the conclusion reached that further SEA reports are not required.

Kind regards,

Natalie Kermath

Historic England Response

From: Marsh, Andrew [REDACTED]
Sent on: Thursday, September 29, 2022 9:04:54 AM
To: Laura Mundy [REDACTED]
CC: EastPlanningPolicy [REDACTED] Marsh,
Andrew [REDACTED]
Subject: RE: SEA Screening Coastal Adaptation Supplementary Planning
Document

Dear Laura,

RE: SEA Screening Coastal Adaptation Supplementary Planning Document

Thank you for consulting Historic England on the draft SEA screening determination for the Coastal Adaptation Supplementary Planning Document (SPD). Having reviewed both the SPD and the draft Screening Statement I can confirm that we support the conclusion that an SEA is not required for the SPD. I would be grateful if you could confirm receipt of this email.

Best wishes,

Andrew Marsh BSc MA MRTPI
Historic Environment Planning Adviser
Development Advice | East of England
Historic England
Mobile: [REDACTED]

Direct line: [REDACTED]

Historic England

Brooklands | 24 Brooklands Avenue | Cambridge | CB2 8BU

www.historicengland.org.uk

Natural England Response

Date: 14 October 2022
Our ref: 405837



Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

Dear Laura Mundy

Natural England's response to the consultation on the draft strategic environmental assessment for the coastal adaptation supplementary planning document

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Thank you for the opportunity to comment on the draft strategic environmental assessment and Habitat Regulations Assessment that relate to the coastal adaptation supplementary planning document.

Summary of response:

- Natural England looked for consistency of language between coastal adaptation supplementary planning document (SPD), the Shoreline Management Plan (SMP) and the Local Plans so that policies can be interpreted clearly and implemented correctly by planners and relevant stakeholders
- We recognise that there is generally a consistency of language between the SPD and the relevant planning policies they relate to (i.e. Local and Neighbourhood Plans)
- The SPD does a good job of explaining the hierarchy of embedded policy details clearly (e.g. Coastal Management Areas are identified in Local Plans which are derived from SMPs)
- We concur with the conclusions of the documents presented to us that the coastal adaptation SPD does not require an EIA
- We also concur with the conclusions of the Habitat Regulations Assessment (HRA) on the coastal adaptation SPD that it will not lead to likely significant effects on protected European sites

Natural England is pleased with the approach and cooperation between the planning authorities across the Norfolk and Suffolk coastline to establish this joined up strategic approach and welcome the delivery of this work, which seeks to establish a consistent interpretation of policies related to coastal change and adaptation along the Norfolk and Suffolk coastline.

We understand that the aim of the SPD is to provide guidance on the correct interpretation of planning policy and aid the implementation of relevant policies and it cannot create new or amend existing planning policies nor can it prescribe that particular areas of land be developed for particular uses. On this basis Natural England does not wish to offer substantive comments on the SPD as this is the role of Development Plans of each Local Authority. However, please see below some very brief comments on the SPD.

Comments

Section 4.29 SPD: *"Open Land Uses Open land uses are likely to be appropriate within the CCMA and indeed may be encouraged as part of the implementation of 'roll-back' proposals and could include Biodiversity Net Gain".* What leavers and/or mechanisms will be used to encourage the implementation of roll-back in this context? A reference to local plan policies would be useful here if available.

Section 4.45 (Table 2): It would be easier to interpret the table if the explanations of Level A and B CEVA" (section 4.47) came before the table.

Section 5.7 and 5.8 SPD: In the "Identifying alternative sites or land" and "Identifying appropriate site sizes" sections of the SPD, there is no reference to European Designated sites in the guidance around identification of alternative and appropriate sites. Natural England would like to point out that any alternative sites should seek to avoid likely significant effects if on or near European Designated sites and not undermine the sites conservation objectives.

General comments - Coastal SPD HRA: Document refers to both Supplementary Planning document and SPD interchangeably. Once the SPD acronym has been introduced, it is more concise to use the abbreviated SPD.

Draft Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment screening opinions

Natural England are satisfied with the conclusions of the SEA and HRA Screening Documents; it is not necessary for a SEA to be undertaken in relation to the SPD and we agree with the conclusion of the HRA Screening Statement. Implementation of the SPD will not lead to likely significant effects on protected European sites and therefore no further assessment is necessary

Should the proposal change, please consult us again.

If you have any queries relating to the advice in this letter please contact me [REDACTED]
[REDACTED]

Yours sincerely

Daniel Turner
Norfolk and Suffolk Team

Habitats Regulations Assessment Screening Statement

Coastal Adaptation Supplementary Planning Document

October 2022



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1. Introduction

- 1.1 The Conservation of Habitats and Species Regulations (2017) (as amended) provide protection for sites that are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species. The network consists of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both types can also be referred to as European Sites. The National Planning Policy Framework (NPPF) states that Ramsar sites should be afforded the same level of protection and refers to SACs, SPAs and Ramsar sites as 'Habitat Sites'.
- 1.2 The requirement to undertake Habitats Regulation Assessment (HRA) of plans and projects is set out in the Conservation of Habitats and Species Regulations (2017) (as amended).
- 1.3 Regulation 105 of the Conservation of Habitats and Species Regulations (2017) states:
- 'Where a land use plan:
- (a) Is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and
 - (b) Is not directly connected with or necessary to the management of the site,
- The plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.'
- 1.4 The HRA is therefore undertaken in stages and should conclude whether or not a proposal or policy would adversely affect the integrity of any sites.

Stage 1: Determining whether a plan is likely to have a significant effect on a European site. This needs to take account of the likely impacts in combination with other relevant plans and projects. This assessment should be made using the precautionary

principle. The screening assessment must reflect the outcomes of the 2018 judgement of the Court of Justice of the European Union¹, which has ruled that where mitigation is necessary this must be identified through an Appropriate Assessment.

Stage 2: Carrying out Appropriate Assessment and ascertaining the effect on site integrity. The effects of the plan on the conservation objectives of sites should be assessed, to ascertain whether the plan has an adverse effect on the integrity of a European site.

Stage 3: Identifying mitigation measures and alternative solutions. The aim of this stage is to find ways of avoiding or significantly reducing adverse impacts, so that site integrity is no longer at risk. If there are still likely to be negative impacts, the option should be dropped, unless exceptionally it can be justified by imperative reasons of overriding public interest.

- 1.5 The Coastal Adaptation Supplementary Planning Document (SPD) is being prepared by a partnership of East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority, and the shared Coastal Partnership East team. The purpose of the SPD is to provide guidance on aligned policy approaches along the coast. The SPD follows on from the Statement of Common Ground on Coastal Zone Planning agreed between the partnership authorities in September 2018. The SPD will ensure planning guidance is up to date, aid the interpretation and delivery of planning policy, and provide case study examples of coastal adaptation best practice. This report considers whether there are likely to be significant effects on protected Habitat sites as the result of the guidance in the SPD. The geographical extent of the SPD partnership area is illustrated by figure 1 below:

¹ C-323/17 – People over Wind, Peter Sweetman v Coillte Teoranta

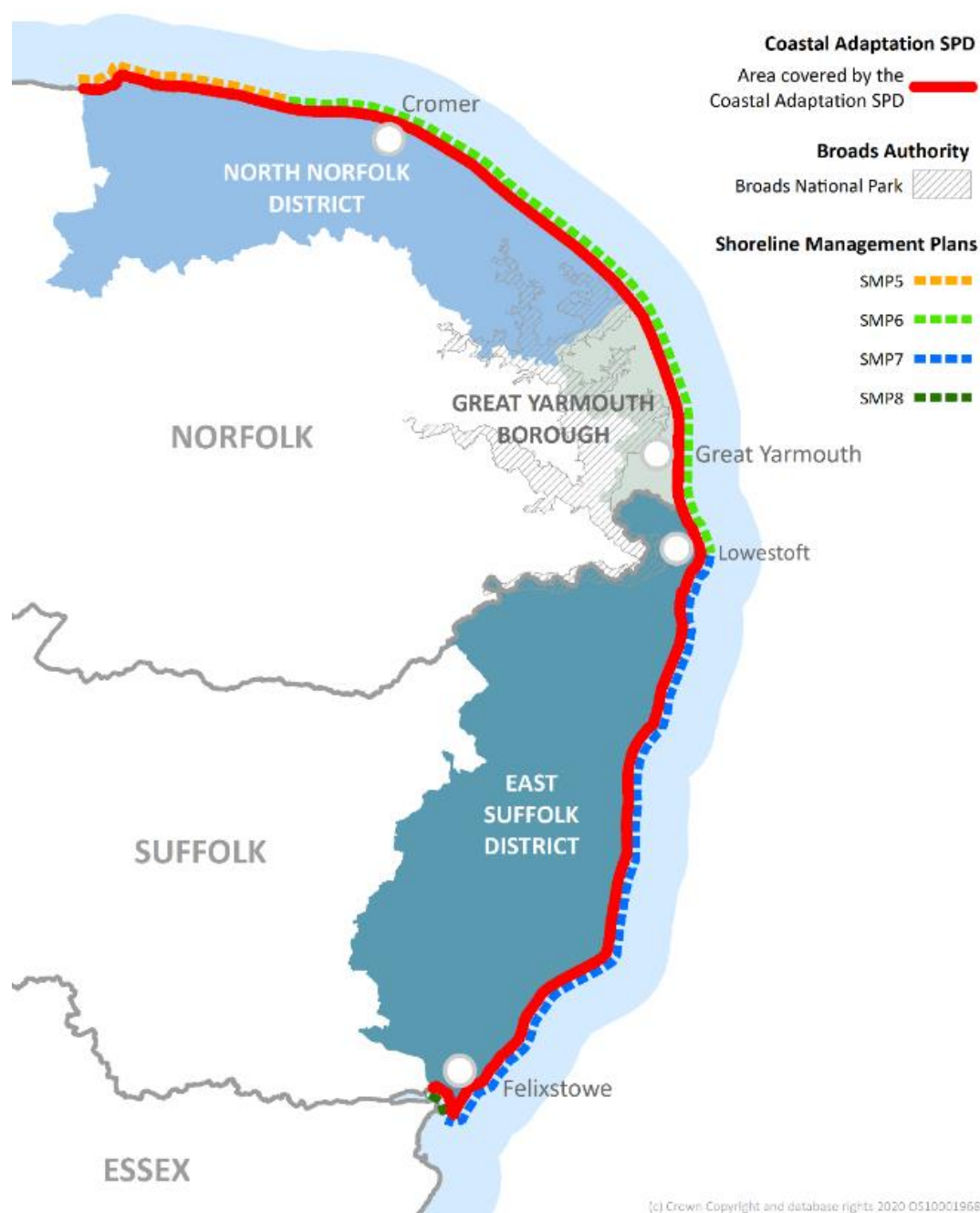


Figure 1: Extent of Coastal Adaptation Partnership Area

1.6 Within the partnership area there are a number of Local Plans, which are summarised below:

- East Suffolk (outside of the Broads) is covered by two Local Plans, the East Suffolk Council - Suffolk Coastal Local Plan adopted September 2020 and the Waveney Local Plan adopted March 2019.
- The Local Plan for Great Yarmouth (outside of the Broads) is made up of two parts, the Core Strategy (Local Plan Part 1) adopted December 2015, and the

Local Plan Part 2 adopted December 2021. The Borough Council is currently progressing a review of the Local Plan. The new Local Plan will eventually replace the Core Strategy and the Local Plan Part 2. It is intended the new Local Plan will be a single document, rather than being separate Local Plans covering strategy, allocation and detailed policies. The first stage in the review process was a 'call for sites' and consultation on a new Sustainability Appraisal Scoping Report which was held between 27 May 2022 and 08 July 2022.

- The Local Plan for North Norfolk (outside of the Broads) comprises the Core Strategy and Development Management Policies adopted September 2008, and the Site Allocations Development Plan Document adopted February 2011. The District Council is currently at an advanced stage in the production of a new Local Plan and consultation on a Proposed Submission Version (Regulation 19 Publication Stage) was held during January and February 2022.
- The Broads Authority adopted the Local Plan for the Broads on 17 May 2019. The Broads Authority have recently commenced a review the Local Plan for the Broads. The first stage in the review process was a consultation on a new Sustainability Appraisal Scoping Report which was published for technical consultation in June 2021. Issues and Options consultation commenced in October 2022.

2. Protected sites covered by this report

- 2.1 Sites included in this assessment are listed in Table 1. This includes all sites that are within 20km of the SPD Partnership Area. The locations of the sites are shown on maps in Appendix 2 and the Qualifying Features and Conservation Objectives of the sites are contained in Appendix 3.

Table 1: Relevant Habitat sites

Name
Alde-Ore and Butley Estuaries SAC,
Alde-Ore Estuary SPA, Ramsar
Benacre to Easton Bavents SPA
Benacre to Easton Bavents Lagoons SAC
Breckland SAC, SPA
Breydon Water SPA, Ramsar
Broadland SPA, Ramsar
Deben Estuary SPA, Ramsar
Dew's Ponds SAC
Great Yarmouth North Denes SPA
Greater Wash SPA
Haisborough, Hammond and Winterton SAC
Inner Dowsing, Race Bank and North Ridge SAC
Minsmere to Walberswick Heaths & Marshes SAC
Minsmere – Walberswick SPA, Ramsar
Norfolk Valley Fens SAC
North Norfolk Coast SAC, SPA, Ramsar
Outer Thames Estuary SPA
Orfordness – Shingle Street SAC
Overstrand Cliffs SAC
River Wensum SAC
Roydon Common and Dersingham Bog SAC, Ramsar
Sandlings SPA
Southern North Sea SAC
Staverton Park and The Thicks, Wantisden SAC

Stour and Orwell Estuaries SPA, Ramsar
The Broads SAC
The Paston Great Barn SAC
The Wash and North Norfolk Coast SAC
The Wash SPA, Ramsar
Winterton-Horsey Dunes SAC

3. Coastal Adaptation Supplementary Planning Document

- 3.1 This HRA report reviewed an early draft of the Coastal Adaptation SPD, dated August 2022 which was produced prior to the finalisation of the consultation draft.
- 3.2 The overall purpose of the SPD is to provide guidance on how to interpret and implement planning policy in relation to coastal matters. The guidance contained in the SPD will assist in the implementation of Local Plan and Neighbourhood Plan policies for the authorities that make up the SPD partnership area (East Suffolk, Great Yarmouth, North Norfolk and The Broads Authority Area). The SPD, when adopted, will be a material consideration in determination of applications for planning permission.
- 3.3 Chapter 1, 2 and 3 of the SPD set out the introduction, the purpose of the SPD, the policy context and an explanation the roles and remits of different organisations involved in coastal matters throughout the SPD partnership area. These chapters are descriptive statements of fact and have therefore not been included in the screening table in section 5 of this report.
- 3.4 The other chapters provide guidance on specific coastal matters to support the interpretation and implementation of planning policies. They cover:
- Development in the Coastal Change Management Area;
 - Rollback and Relocation, and
 - Delivery and Enabling Development.
- These chapters have all been included in the screening table in section 5 along with a brief summary of each chapter.
- 3.5 The SPD also includes 3 appendices. These provide additional detail to support the main body of the SPD but do not in themselves introduce any new requirements and have therefore not been included in the screening table in section 5 of this report.

4. Other Plans and Projects

- 4.1 Regulation 105 of the Habitats Regulations requires consideration to be given to whether a Plan will have an effect either alone or in combination with other plans or projects.
- 4.2 As noted in the introduction, the other key plans are the Local Plans. The Local Plans set out the broad scale and distribution of development across the four authorities which make up the SPD Partnership Area.
- 4.3 Specifically, the SPD adds detail to the following policies contained within the Local Plans:
- East Suffolk Council- policies SCLP9.3 (Coastal Change Management Area) and SCLP9.4 (Coastal Change Rollback or Relocation) of the Suffolk Coastal Local Plan and policies WLP8.25 (Coastal Change Management Area), WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion) of the Waveney Local Plan.
 - Great Yarmouth Borough Council- Local Plan Part 1 policy CS13 (Protecting Areas at Risk of Flooding or Coastal Change), Local Plan Part 2 policy GSP4 (New Development in Coastal Change Management Areas), Local Plan Part 2 policy E2 (Relocation from Coastal Change Management Areas).
 - North Norfolk District Council- Core Strategy policy EN11 (Coastal Erosion), policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk), emerging Local Plan policy CC5 (Coastal Change Management), and emerging Local Plan policy CC6 (Coastal Change Adaptation).
 - The Broads Authority- Broads Local Plan policy SSCOAST (The Coast).
- 4.4 Screening has been carried out on all the relevant local plans across the partnership area and concluded whether significant effects were likely and if Appropriate Assessment was therefore needed. Where screening identified a likely significant effect, Appropriate Assessment was undertaken and the mitigation measures identified were incorporated within the Plans, resulting in conclusions that the plans will not lead to any adverse effects on Habitat sites.

4.5 Recreational Disturbance from new residential development has been identified as a significant effect across the SPD partnership area. As a result of which, two strategic mitigation schemes have been developed and implemented, and the relevant Councils require payment towards mitigation within the relevant Zone of Influence:

- Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils (May 2019) (this also applies to part of the Broads Authority area)
- Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy (March 2021).

5. Assessment of likely significant effects of the Draft Coastal Adaptation Supplementary Planning Document (SPD) on Habitat sites

- 5.1 Table 3 below considers each relevant section of the SPD in relation to whether there is potential for a likely significant effect on protected Habitat sites. This constitutes Stage 1 as set out under paragraph 1.4 above. Consideration is given to the characteristics and location of the protected sites. The relevant sections are considered within the context of the Local Plan policies from which they hang and which have themselves been subject to Habitats Regulations Assessment, as set out in section 4 above.

Table 3: Likely significant effects of the Draft Coastal Adaptation Supplementary Planning Document

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
Chapter 4: Development in the Coastal Change Management Area	This chapter provides detailed guidance regarding the types of development that may be appropriate within identified Coastal Change Management Areas (CCMAs) and set out the planning considerations for development within the CCMAs. The guidance in this chapter builds on the relevant local plan policies, namely: East Suffolk Council: SCLP9.3 Coastal Change Management Area and WLP8.25 Coastal Change Management Areas. Great Yarmouth Borough Council: GSP4 New Development in Coastal Change Management Areas. North Norfolk District Council: EN11 Coastal Erosion. The Broads Authority: SSCOAST The Coast The above policies have been subject to separate HRA as part of the their production and any necessary mitigation incorporated into the relevant Local Plans. The guidance in this chapter supports the Government’s objective to ensure that development will only be appropriate in a CCMA if it requires a coastal location and provides substantial economic and social benefits to communities. The guidance is clear that new permanent residential will not be	None	None	No

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	permitted in CCMA's and that new non-residential development that is not associated with an existing building or use, is unlikely to be appropriate within the CCMA, whatever its proposed use. This chapter also provides specific guidance on use Coastal Erosion Vulnerability Assessment (CEVA). This chapter provides guidance for land and property owners and those wishing to apply for planning permission or carry out development within the CCMA. The guidance expands on existing policy and clarifies the approach to the consideration of development within the CCMA's; it does not, in itself promote additional development. This chapter will therefore not lead to likely significant effects on Habitat Sites alone or in combination with other plans or projects.			
Chapter 5: Rollback and Relocation	This chapter explains the requirement for LPAs to make provision for development & infrastructure that needs to be relocated away from CCMA's and links to the relevant guidance in the NPPF and NPPG. This chapter also provides an explanation on what is meant by 'rollback' and 'relocation' and explains that compensation is not included as part of this and	None	None	No

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	is beyond the remit of the SPD. The chapter provides guidance on both residential and commercial, business and leisure uses. The guidance in this chapter builds on the relevant local plan policies, namely: East Suffolk Council: Policy SCLP9.4 (Coastal Change Rollback or Relocation) and Policy WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion). Great Yarmouth Borough Council: Policy E2 (Relocation from Coastal Change Management Areas). North Norfolk District Council Policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk) This chapter provides further detail guidance on the interpretation of the relevant local plan policies particularly around issues such as how land or sites may be identified for rollback or relocation purposes; how such land may be acquired or identified; and how land, which has been vacated from, should be managed or utilised in the future to the point at which it eventually becomes lost to the sea. The guidance in this chapter does not, in itself promote additional development and will therefore not lead to likely significant effects on Habitat Sites alone or in combination with other plans or projects.			

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
Chapter 6: Delivery and Enabling Development	This chapter provides guidance on the circumstances whereby enabling development may be considered necessary to help support coastal adaptation/rollback measures. Example scenarios are provided. This chapter includes reference to opportunities for the rollback or creation of natural habitats through development elsewhere. This chapter provides further detail guidance on the interpretation of the relevant local plan policies and does not, in itself, promote additional development and will therefore not lead to likely significant effects on Habitat Sites alone or in combination with other plans or projects.	None	None	No

6. Summary and conclusions

- 6.1 The Coastal Adaptation Supplementary Planning Document (SPD) provides additional guidance to inform the determination of planning applications across the SPD Partnership Area (East Suffolk, Great Yarmouth, North Norfolk and The Broads Authority Area). The SPD provides information and advice for residents, businesses and other relevant organisations concerning coastal management measures and policies, development in the Coastal Change Management Area (CCMA); rollback and relocation; and delivery and enabling Development.
- 6.2 The guidance contained in the SPD will assist in the implementation of Local Plans and Neighbourhood Plans across the SPD Partnership Area (East Suffolk, Great Yarmouth, North Norfolk and The Broads Authority Area). The SPD, when adopted, will be a material consideration in the determining of applications for planning permission.
- 6.3 Following screening for likely significant effects it is concluded that implementation of the SPD will not lead to likely significant effects on protected Habitat sites alone or in combination with other plans or projects.
- 6.4 Natural England were consulted on a draft of this Screening Statement as statutory nature conservation body and they agreed with the conclusions set out above. Their response can be found in Appendix 4.

Signed:

Dated: 26 October 2022

A handwritten signature in black ink, appearing to read 'I. Withington', with a long horizontal stroke extending to the right.

Iain Withington
Planning Policy Team Leader
North Norfolk District Council

Signed:



Dated: 21 October 2022

Andrea McMillan
Planning Manager - Policy, Delivery and Specialist Services
East Suffolk Council

Signed:

Dated: 31 October 2022



Marie-Pierre Tighe
Director of Strategic Services
The Broads Authority

Signed:

Dated: 31 October 2022



Kim Balls
Principal Strategic Planner
Great Yarmouth Borough Council

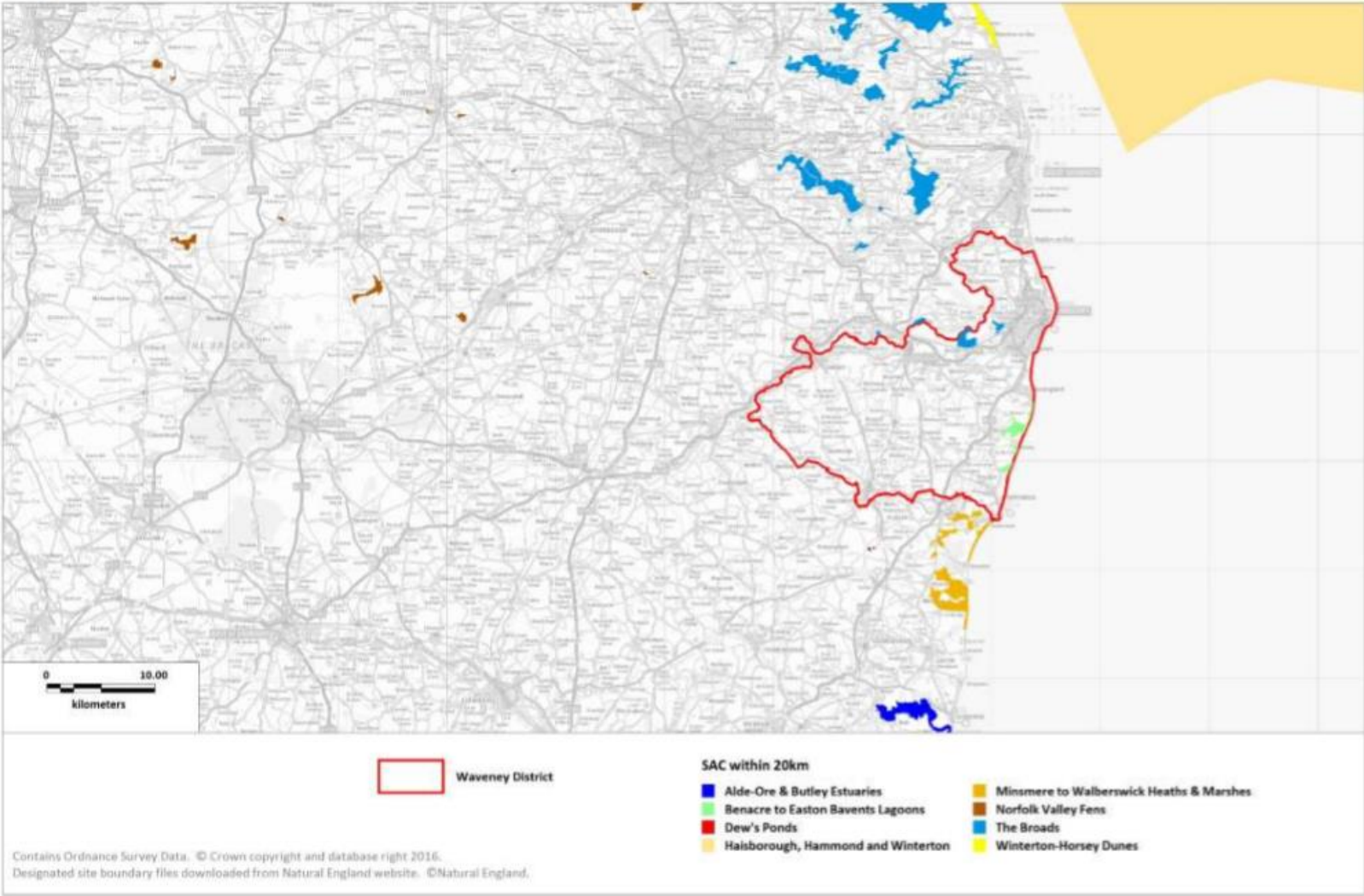
Appendix 1: Sources of background information

- East Suffolk Council – Suffolk Coastal Local Plan (September 2020)
- East Suffolk Council – Waveney Local Plan (March 2019)
- Habitats Regulations Assessment for the Suffolk Coastal Local Plan at Final Draft Plan stage (incorporating Main Modifications) (May 2020)
- The Habitats Regulations Assessment of the Waveney Local Plan (December 2018)
- Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils (May 2019)
- Great Yarmouth Core Strategy (Local Plan Part 1) (December 2015)
- Great Yarmouth Local Plan Part 2 (December 2021)
- Habitats Regulation Assessment of the Great Yarmouth Local Plan Core Strategy (February 2015)
- Habitats Regulations Assessment of the Great Yarmouth Local Plan Part 2 (December 2019)
- Habitats Regulations Assessment of the Great Yarmouth Local Plan Part 2: Addendum at Main Modifications (June 2021)
- North Norfolk Core Strategy Appropriate Assessment (June 2007)
- North Norfolk Local Plan HRA Submission Version (December 2021)
- Local Plan for the Broads Plan 2015 - 2036 (May 2019)
- Habitats Regulations Assessment of the Local Plan for the Broads (January 2019)
- Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy (March 2021)

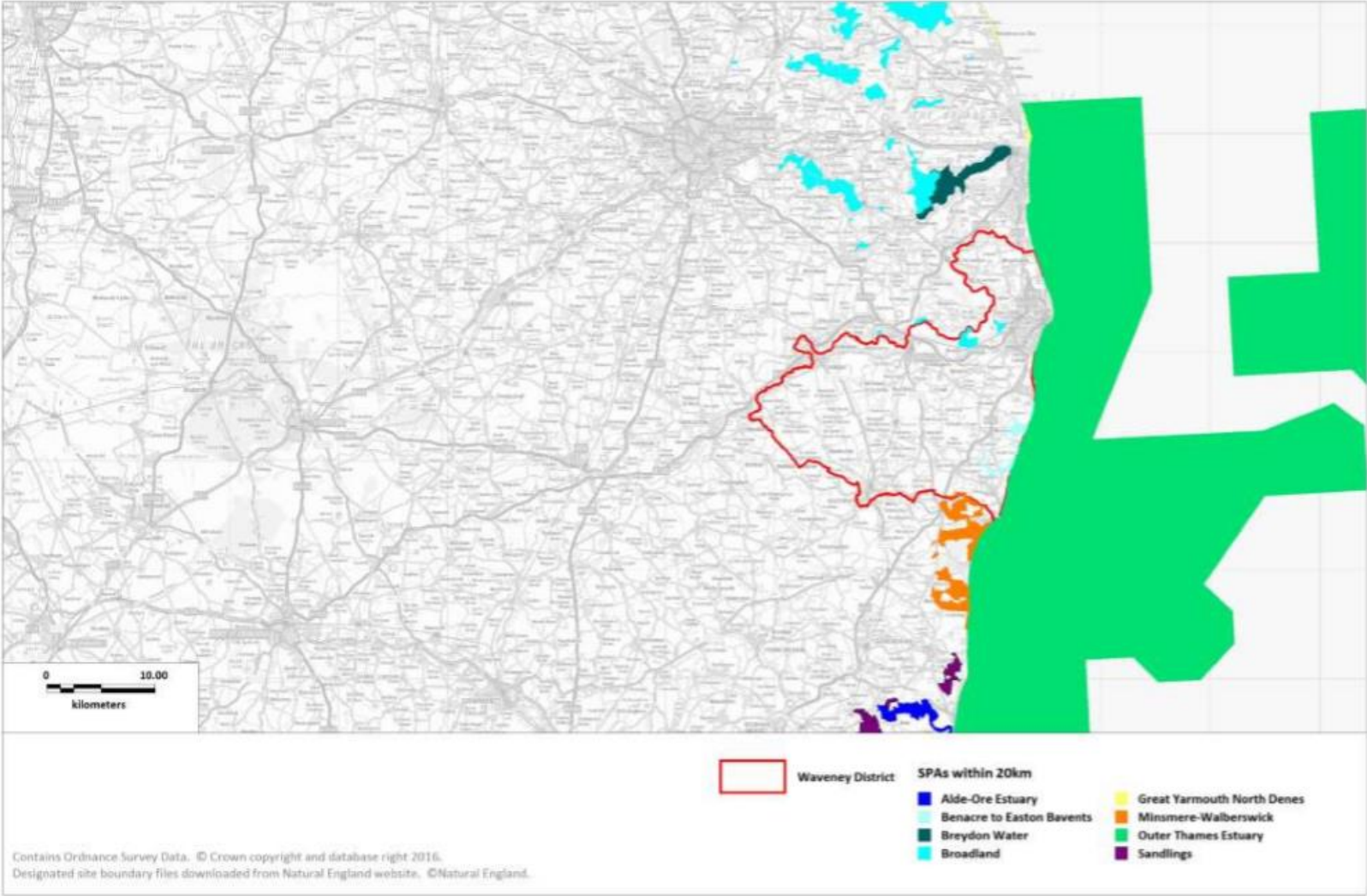
Appendix 2: Locations of Habitat sites

Habitat sites within 20km of the East Suffolk Council-
Waveney Local Plan Area

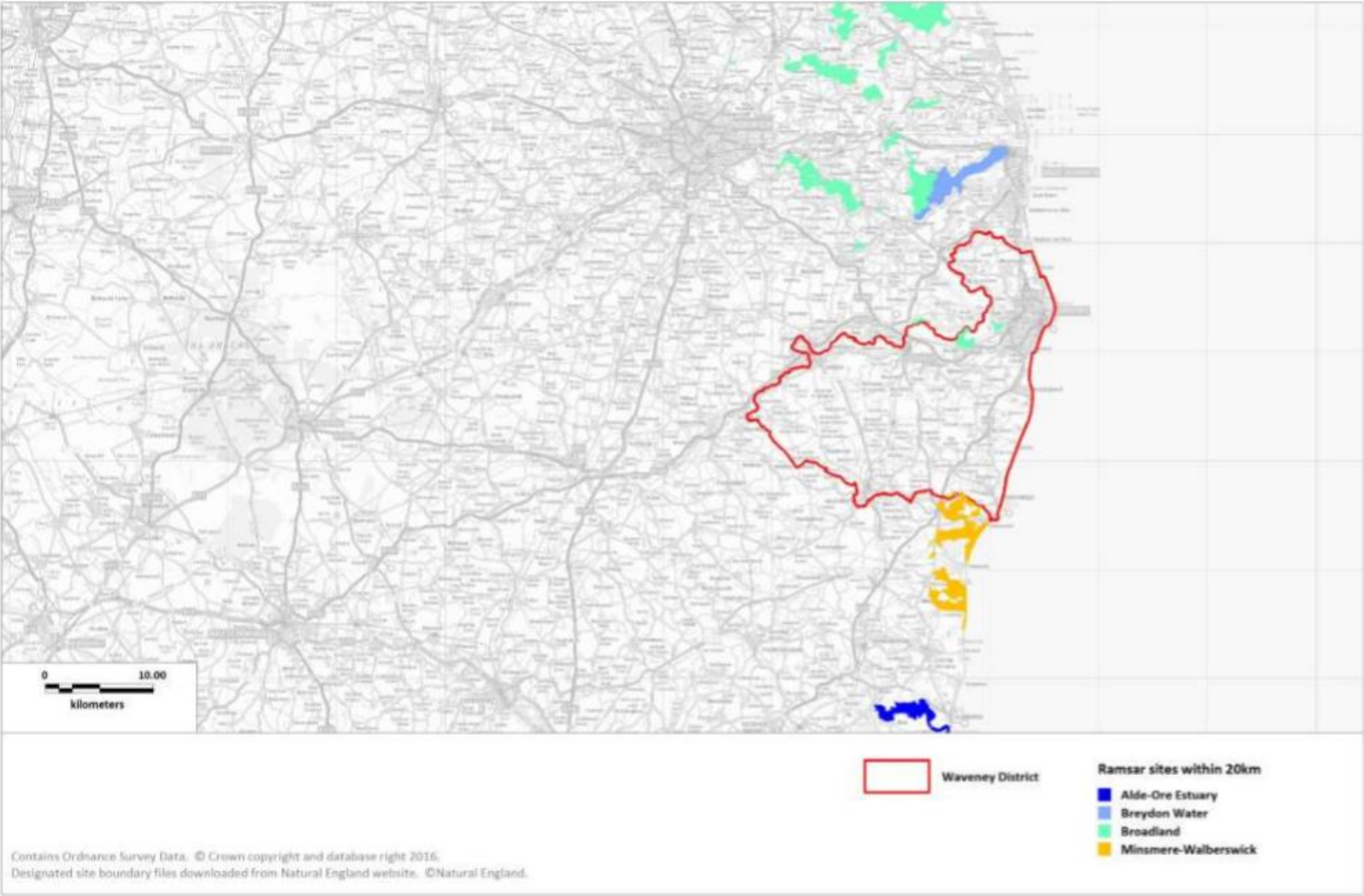
Map 1: SACs



Map 2: SPAs

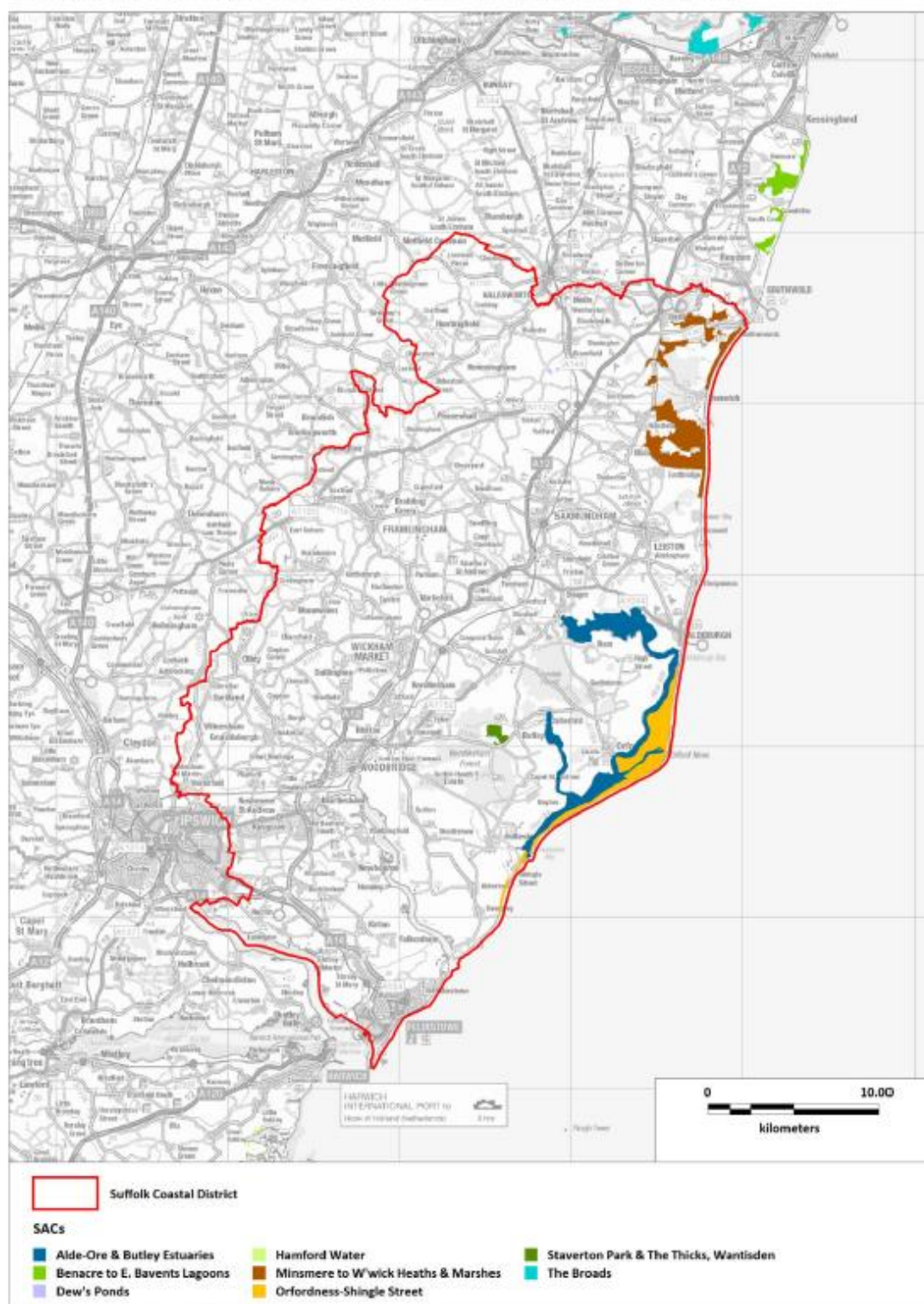


Map 3: Ramsar Sites

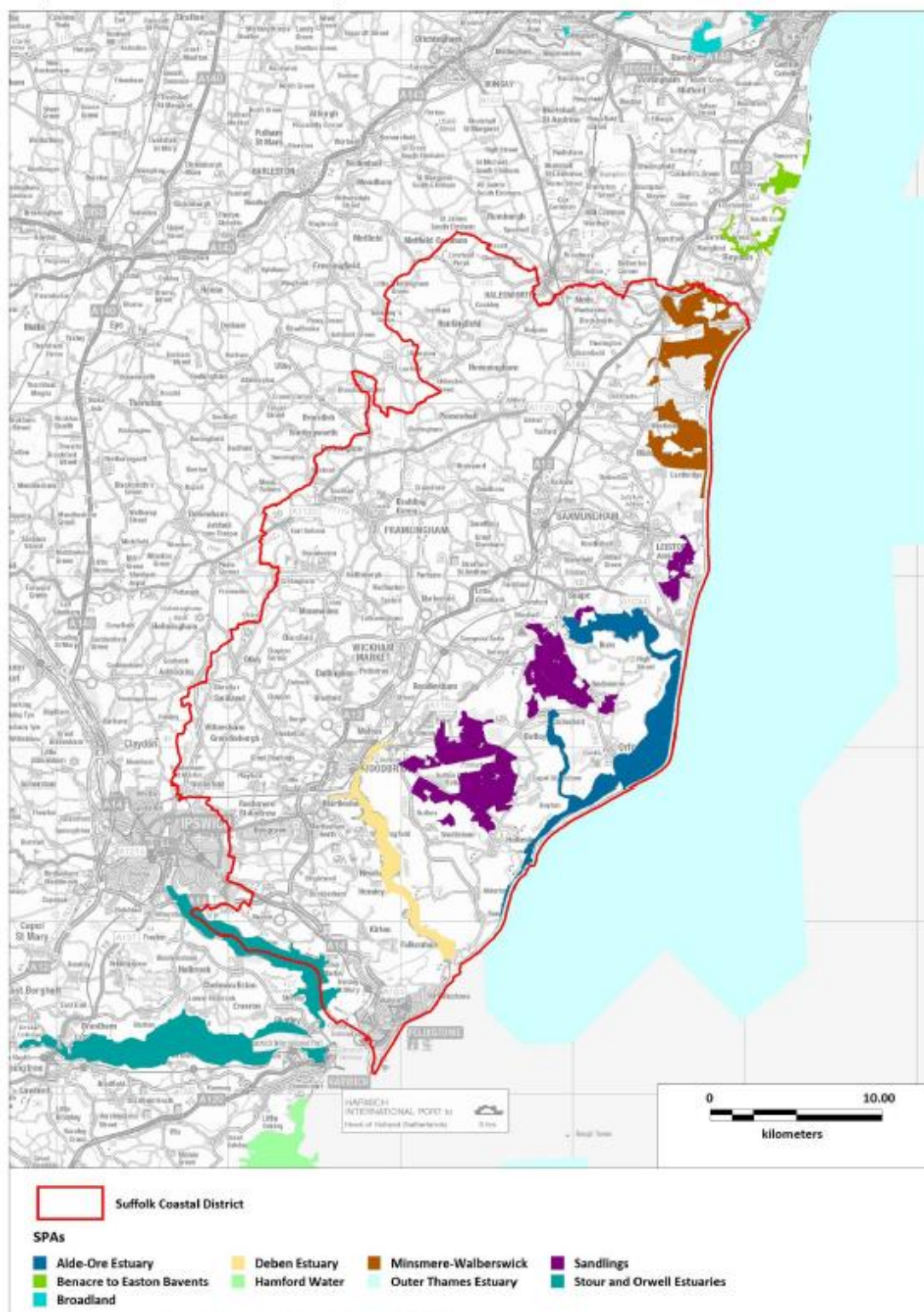


Habitat sites within 20km of the East Suffolk Council- Suffolk Coastal Local Plan Area

Map 1: SAC sites where boundary within 20km of Suffolk Coastal District

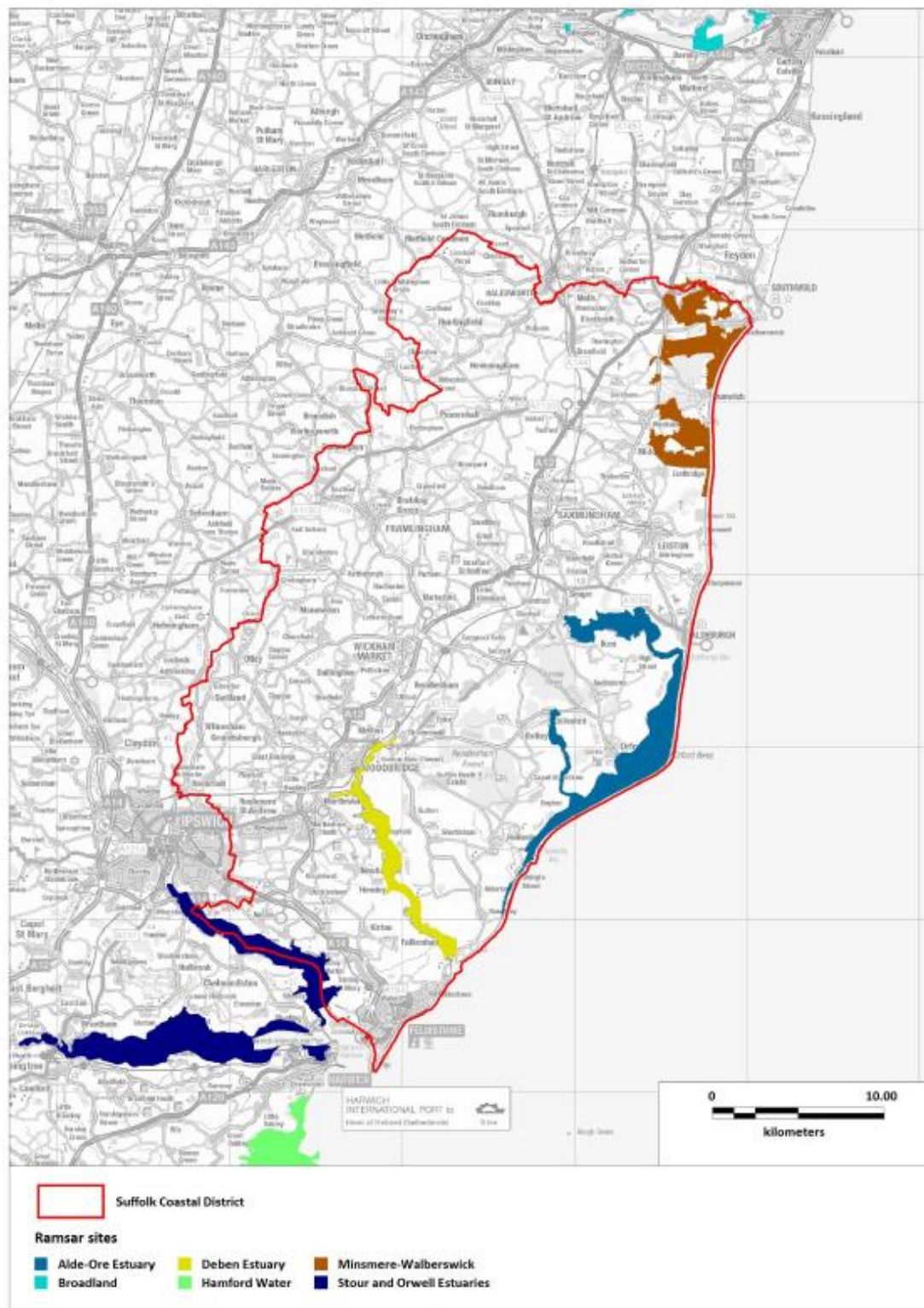


Map 2: SPA sites where boundary within 20km of Suffolk Coastal District



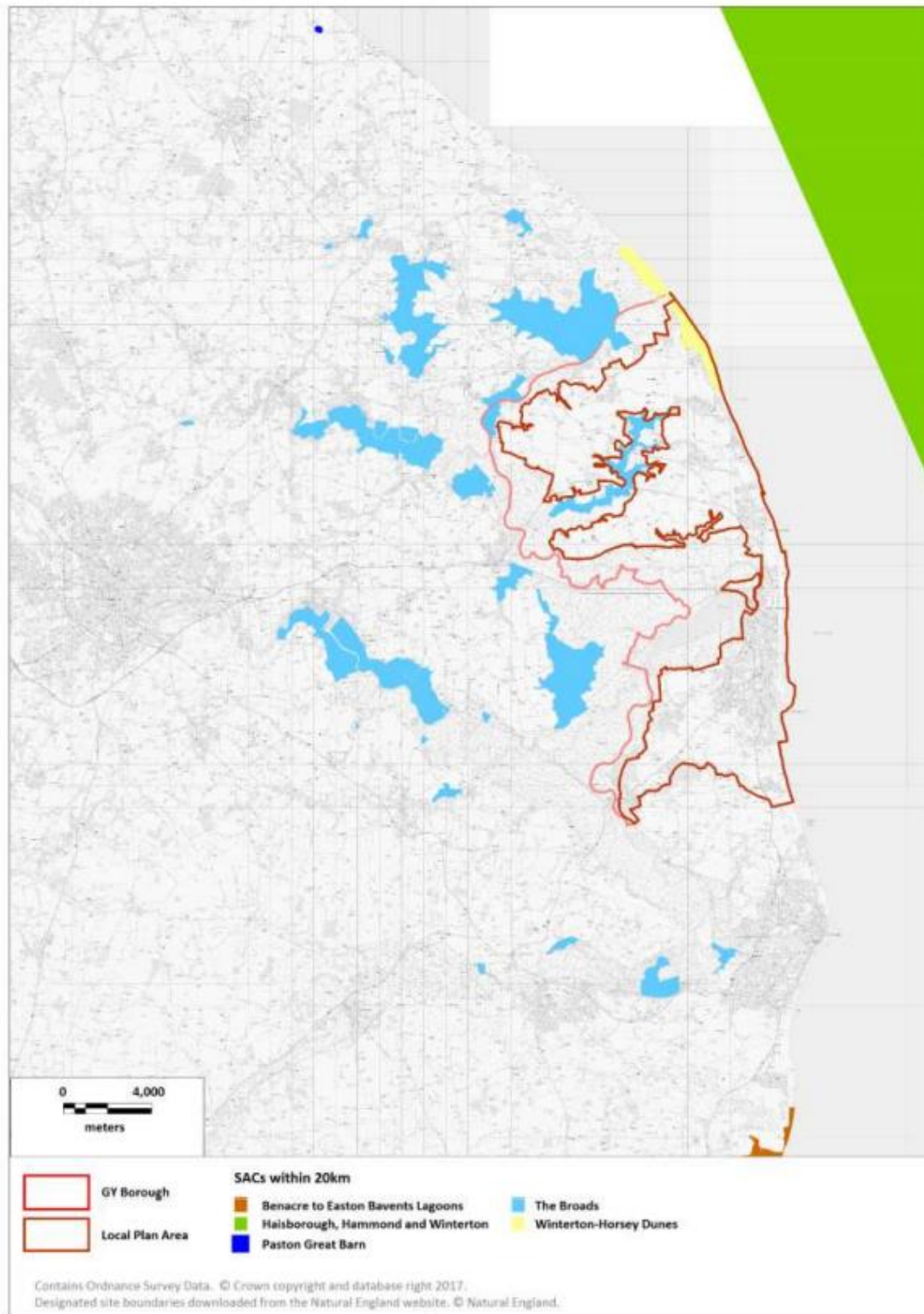
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Map 3: Ramsar sites where boundary within 20km of Suffolk Coastal District

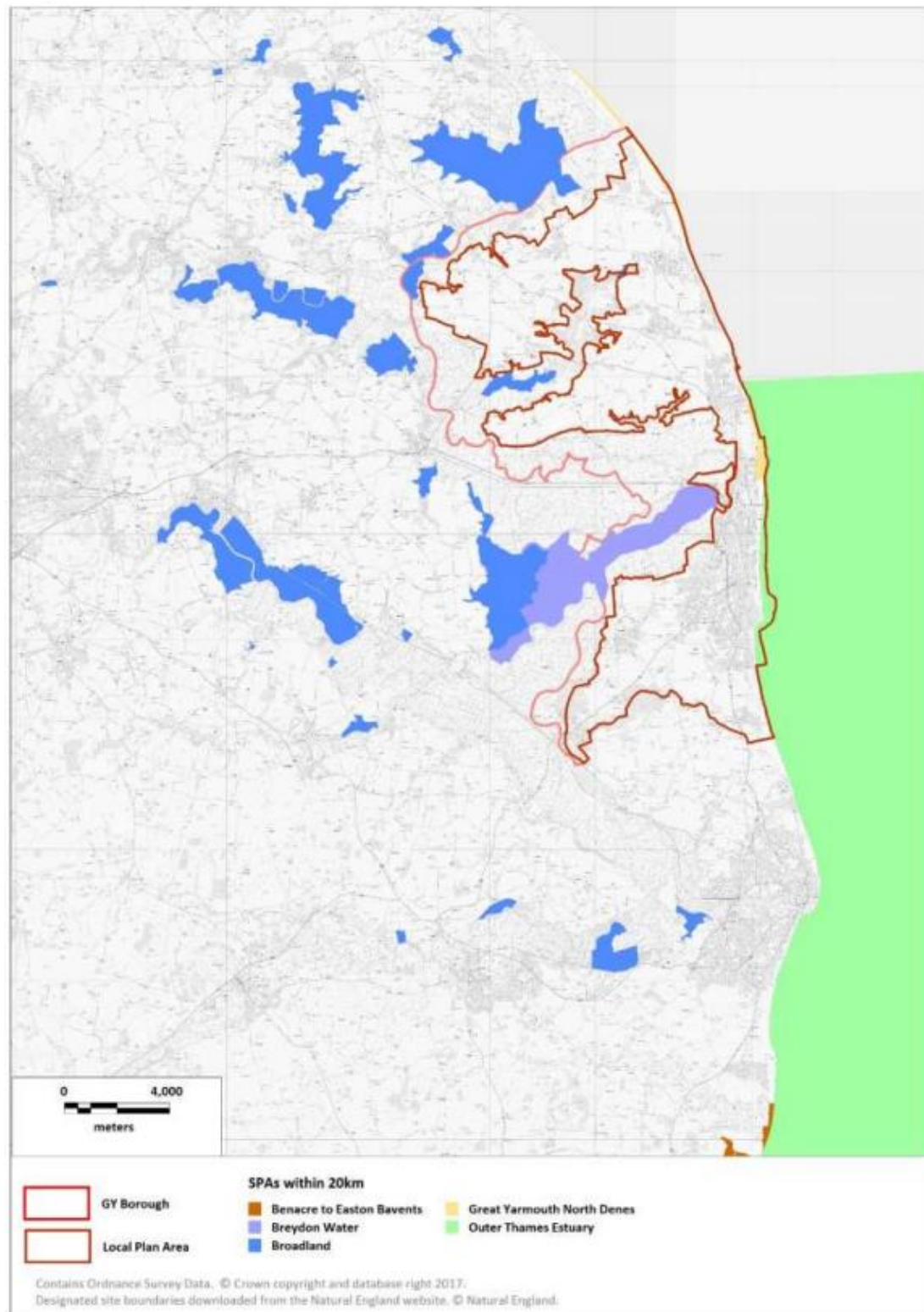


Habitat sites within 20km of the Great Yarmouth Local
Plan Area

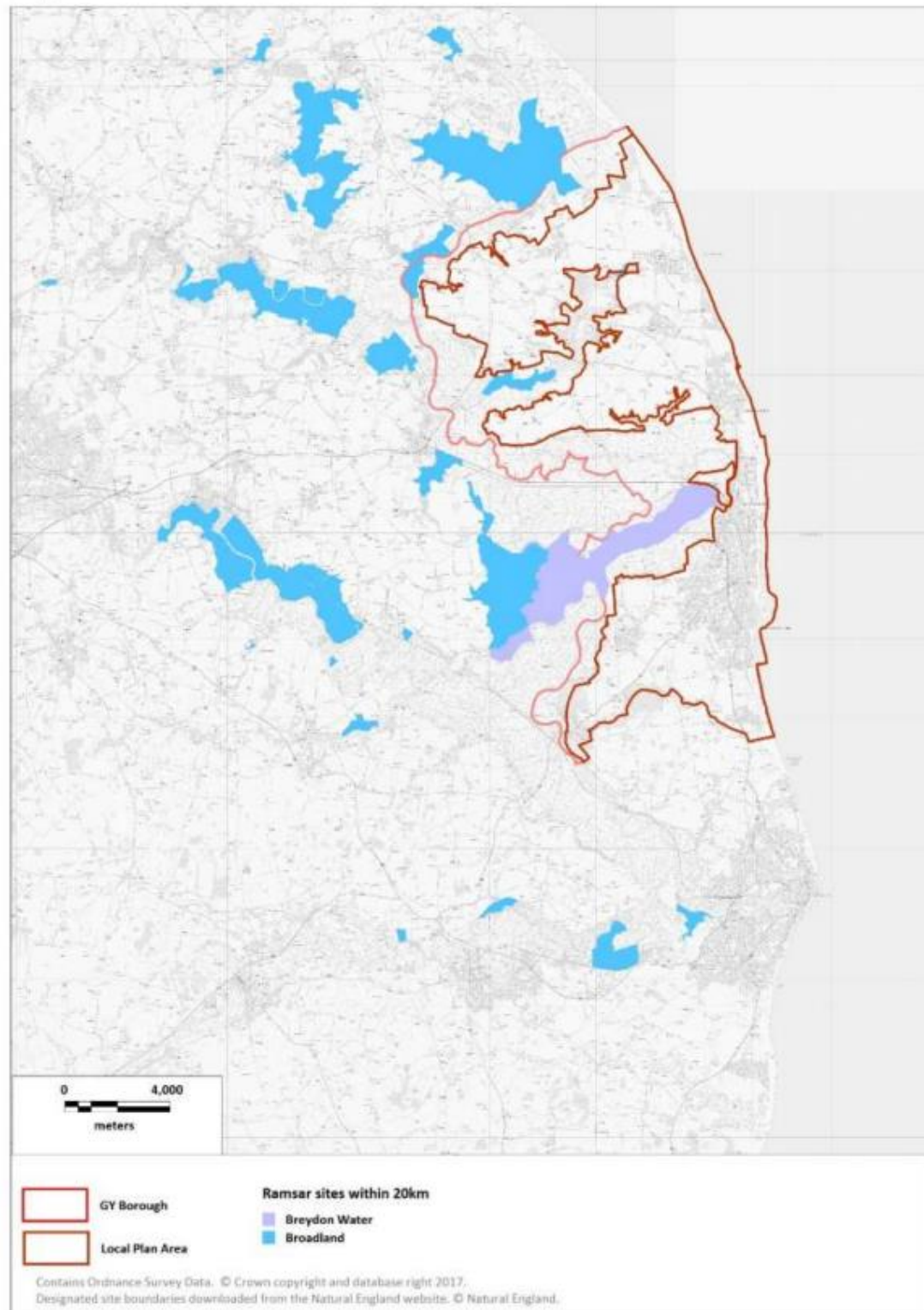
Map 1: SACs and Local Plan Area



Map 2: SPAs and Local Plan Area

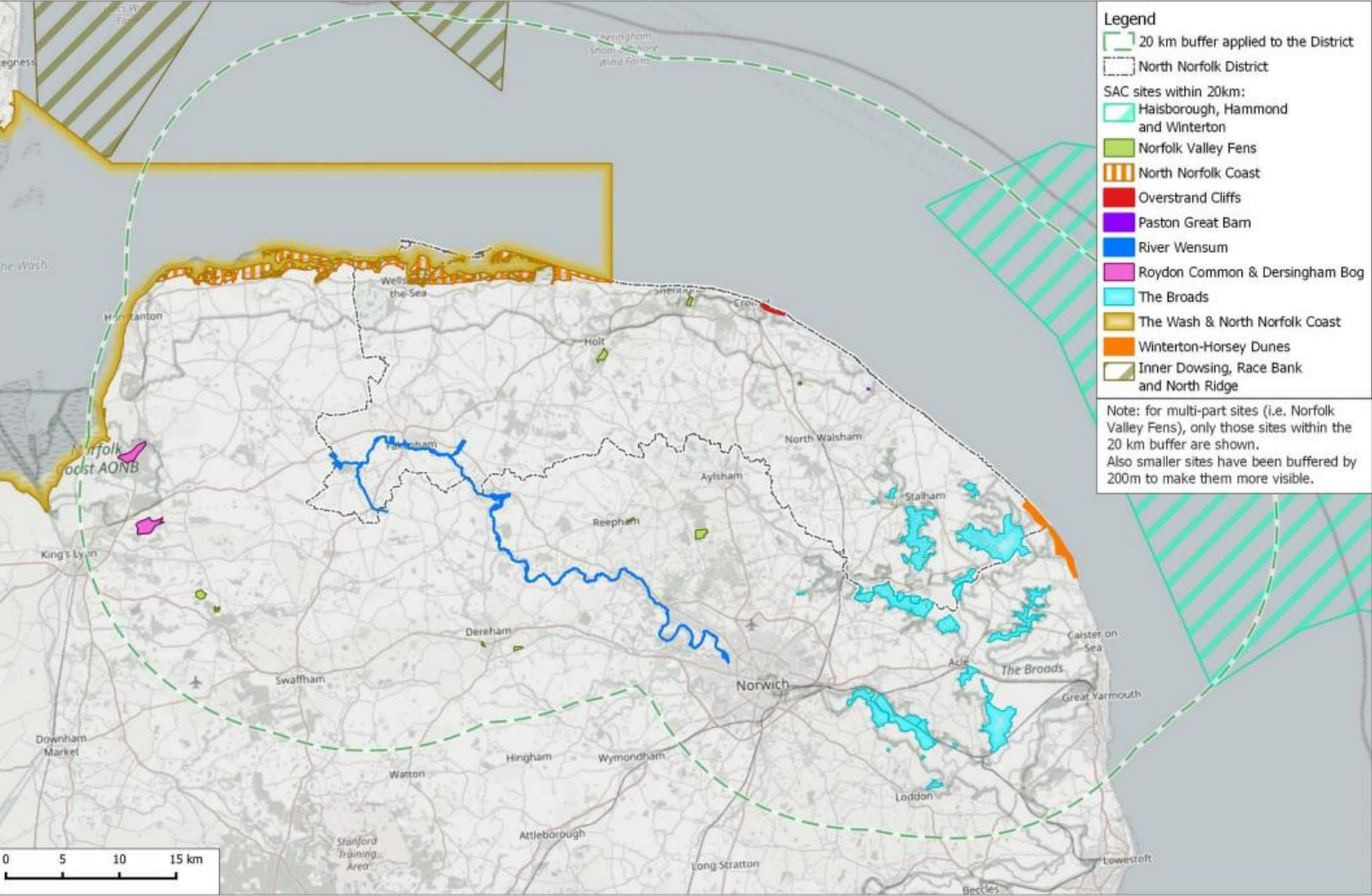


Map 3: Ramsar sites and Local Plan Area



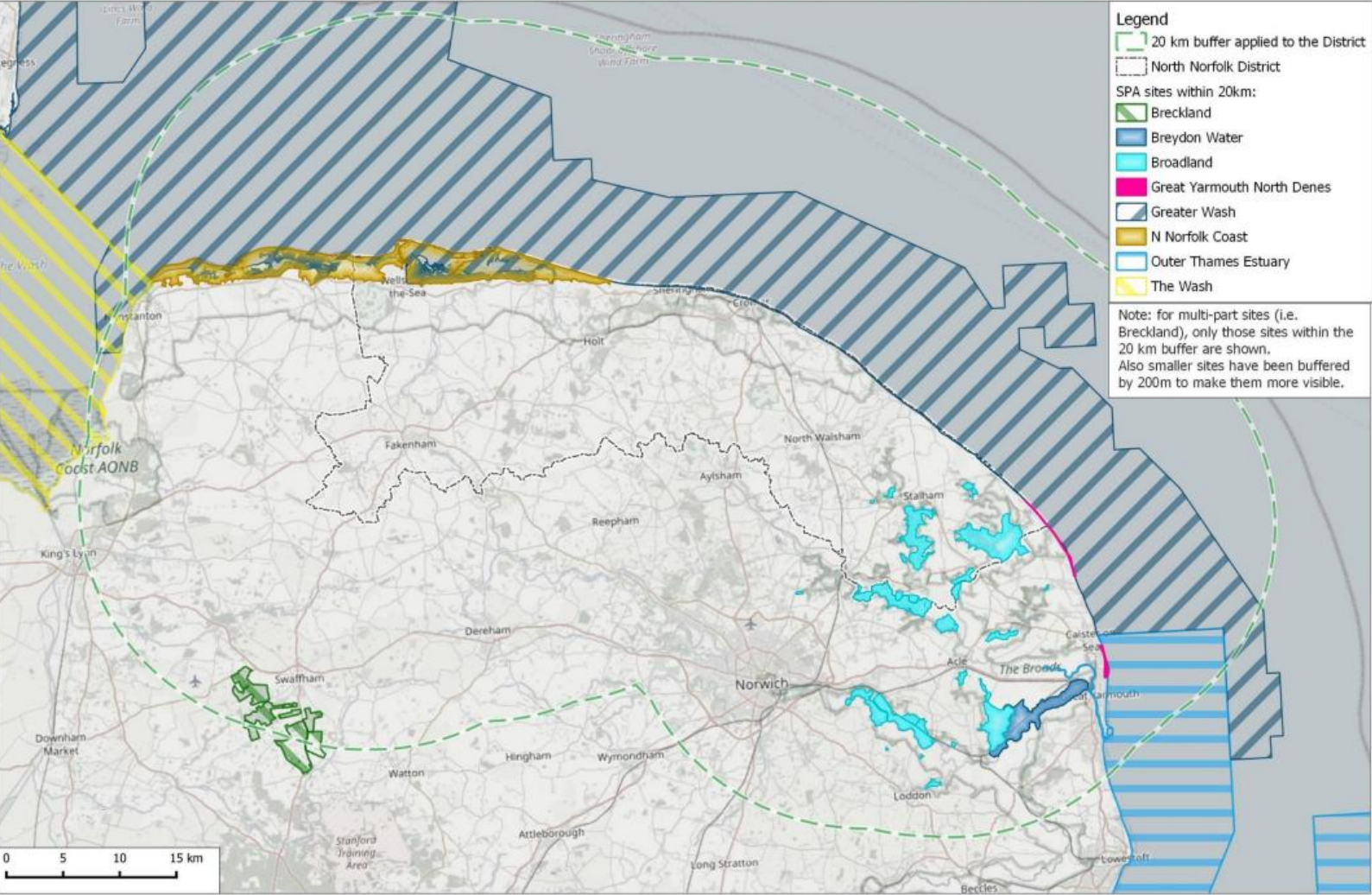
Habitat sites within 20km of the North Norfolk Local
Plan Area

Map 2: SAC sites located entirely or partially within a 20 km buffer of the North Norfolk District.



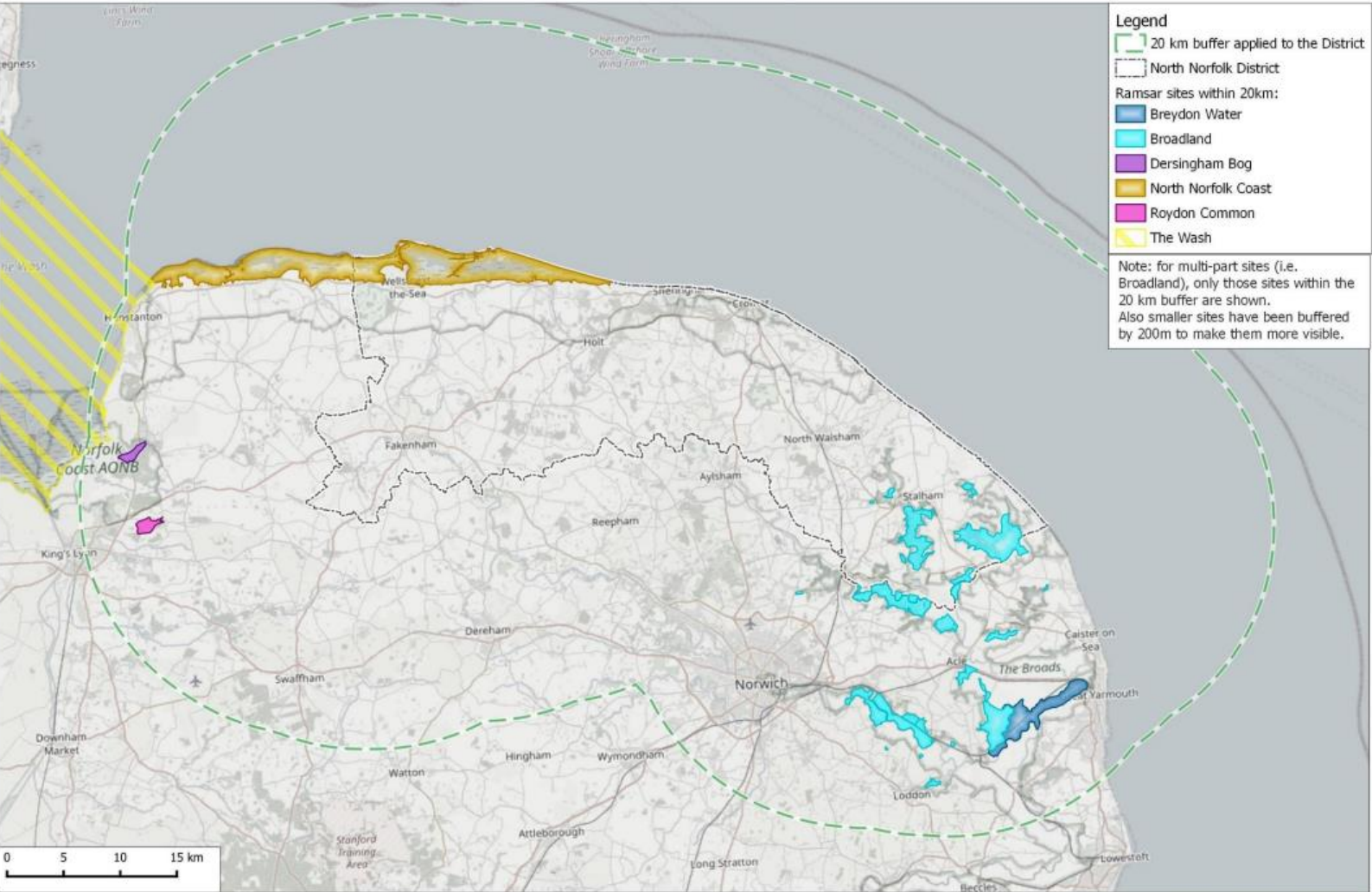
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Map 3: SPA sites located entirely or partially within a 20 km buffer of the North Norfolk District.



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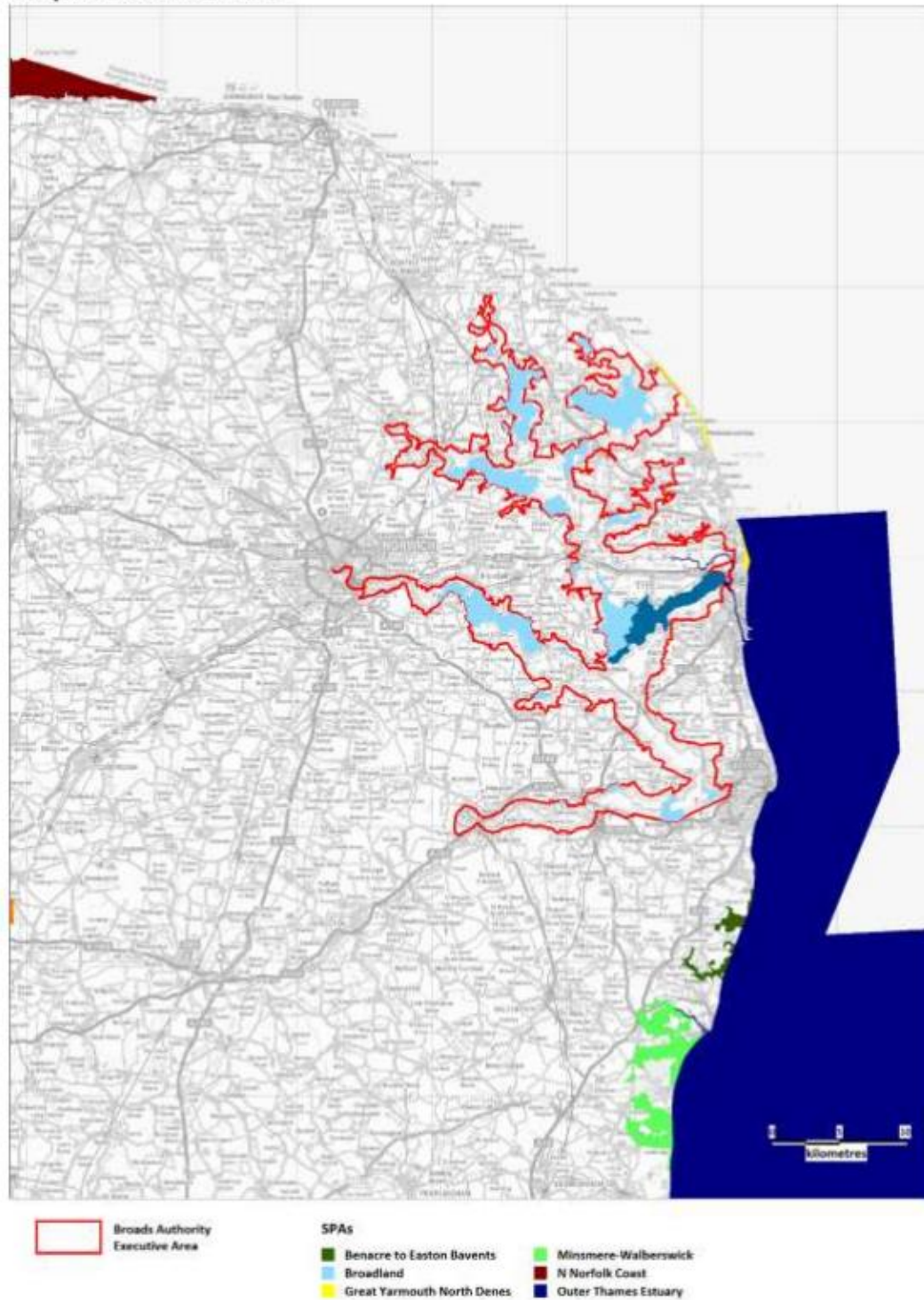
Map 4: Ramsar sites located entirely or partially within a 20 km buffer of the North Norfolk District.



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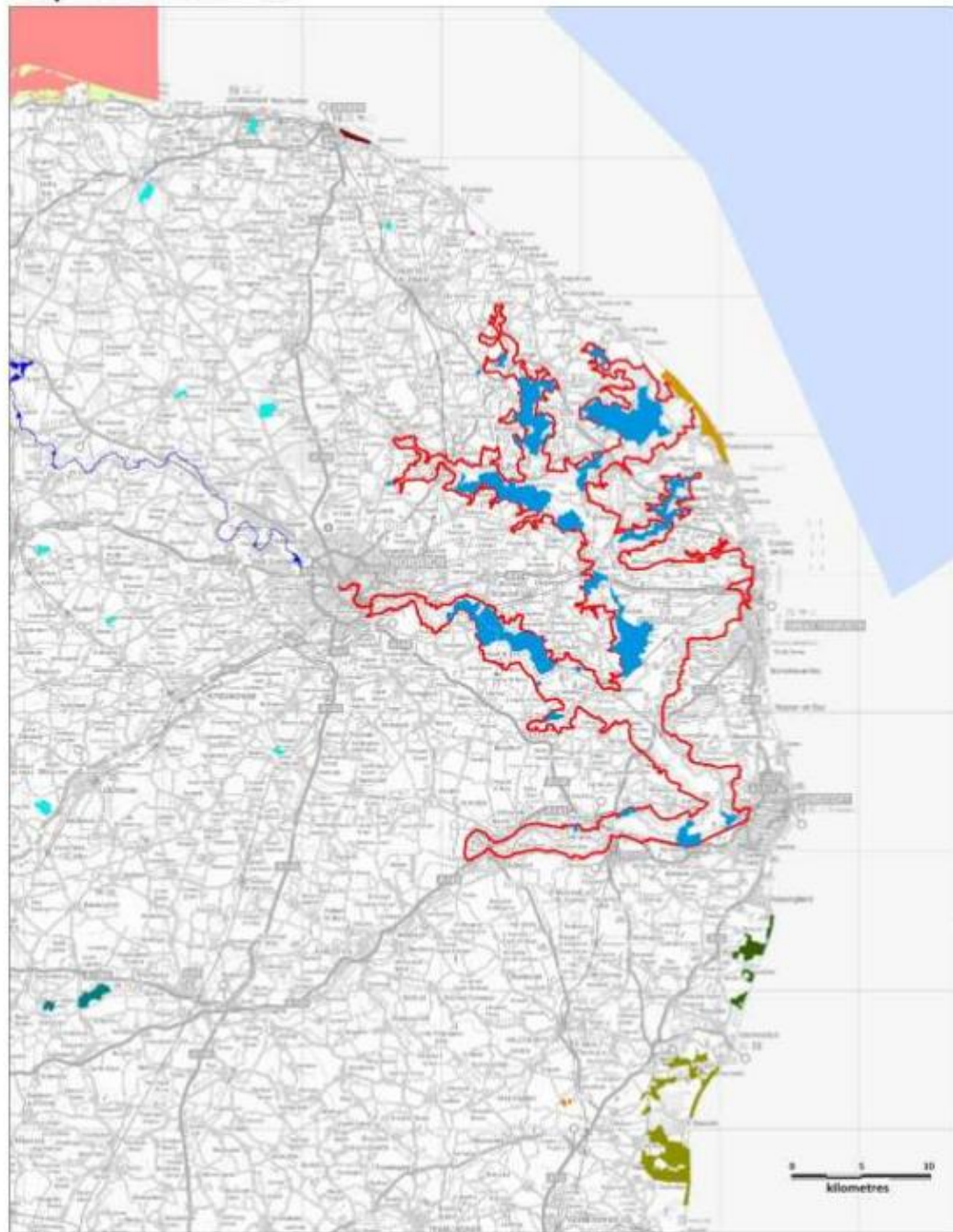
Habitat sites within 20km of The Broads Authority Local
Plan Area

Map 2: Selected SPAs



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Map 3: Selected SACs

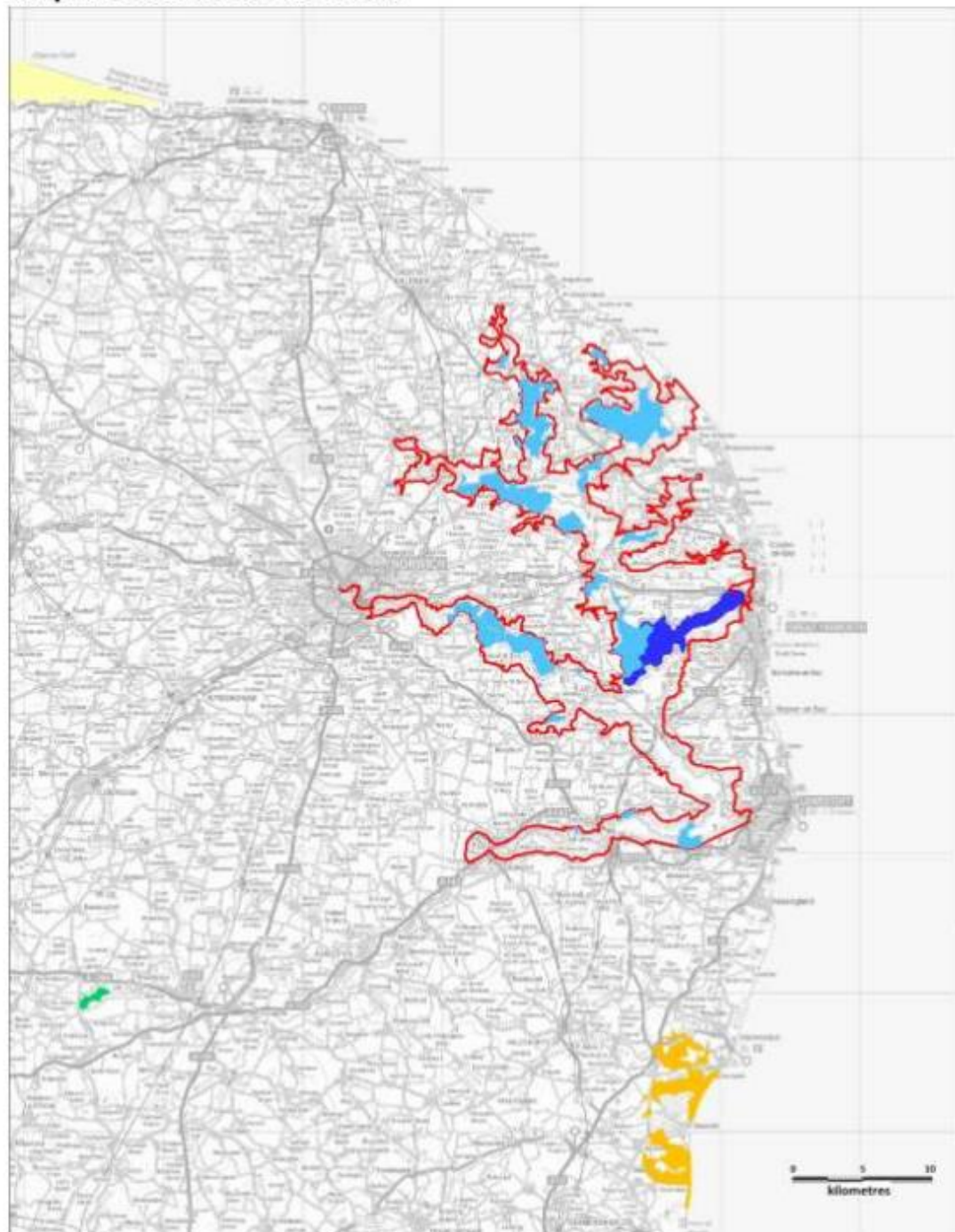


SACs

Benacre to Easton Bavents Lagoons	North Norfolk Coast	The Wash & North Norfolk Coast
Dew's Ponds	Overstrand Cliffs	Waveney & Little Ouse Valley Fens
Haisborough, Hammond and Winterton	Paston Great Barn	Winterton-Horsey Dunes
Minster to Walberswick Heaths & Marshes	River Wensum	
Norfolk Valley Fens	The Broads	
		Broads Authority Executive Area

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Map 4: Selected Ramsar Sites



Ramsar Sites

- Breydon Water
- Broadland
- Minsmere-Walberton
- North Norfolk Coast
- Redgrave & South Lopham Fens



Broads Authority Executive Area

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Appendix 3: Relevant Habitat sites

Name	Qualifying features	Conservation Objectives
Special Areas of Conservation		
Alde-Ore and Butley Estuaries	H1130:Estuaries H1140: Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats H1330: Atlantic salt meadows	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; The supporting processes on which qualifying natural habitats rely.
Benacre to Easton Bavents Lagoons	H1150# Coastal lagoons, A195(B) <i>Sterna albifrons</i> : Little tern A021(B) <i>Botaurus stellaris</i> : Great bittern A081(B) <i>Circus aeruginosus</i> : Eurasian marsh harrier	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats, The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.
Breckland	H2330 Inland dunes with open <i>Corynephorus</i> and <i>Agrostis</i> grasslands H3150 Natural eutrophic lakes with <i>Magnopotamion</i> or <i>Hydrocharition</i> H4030 European dry heaths H6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-</i>	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of the habitats of qualifying species, The structure and function of the habitats of qualifying species,

	Brometalia), (note that this includes the priority feature "important orchid rich sites") H91E0# Alluvial woods with A. glutinosa, F. excelsior S1166 Great crested newt, Triturus cristatus	The supporting processes on which the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.
Dew's Ponds	S1166 Triturus cristatus: Great crested newt	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of the habitats of qualifying species, The structure and function of the habitats of qualifying species, The supporting processes on which the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.
Haisborough, Hammond and Winterton	H1110 Sandbanks which are slightly covered by sea water all the time H1170 Reefs	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of the habitats of qualifying species, The structure and function of the habitats of qualifying species, The supporting processes on which the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.

Inner Dowsing, Race Bank and North Ridge	H1110 Sandbanks which are slightly covered by sea water all the time H1170 Reefs	The Conservation Objective for the Inner Dowsing, Race Bank and North Ridge SAC is to maintain or restore the habitat Annex 1 Sandbanks which are slightly covered by seawater all the time in Favourable Condition, and the habitat Annex I reef in Favourable Condition.
Minsmere to Walberswick Heaths and Marshes	H4030 European dry heaths H1210 Annual vegetation of drift lines H1220 Perennial vegetation of stony banks A052(B) Anas crecca: Eurasian teal A021(B) Botaurus stellaris: Great bittern A081(B) Circus aeruginosus: Eurasian marsh harrier A082(NB) Circus cyaneus: Hen harrier A224(B) Caprimulgus europaeus: European nightjar A056(B) Anas clypeata: Northern shoveler A056(NB) Anas clypeata: Northern shoveler A051(B) Anas strepera: Gadwall A051(NB) Anas strepera: Gadwall A132(B) Recurvirostra avosetta: Pied avocet A195(B) Sterna albifrons: Little tern A394(NB) Anser albifrons albifrons: Greater white-fronted goose	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats, The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.
Norfolk Valley Fens	H4010 Northern Atlantic wet heaths with Erica tetralix H4030 European dry heaths H6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco-Brometalia), (note that this includes the priority feature "important orchid rich	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats,

	sites") H6410 Molinia meadows on calcareous, peat or clay-silt soil H7210# Calcareous fens with C. mariscus and species of C. davallianae H7230 Alkaline fens H91E0# Alluvial woods with A. glutinosa, F. excelsior S1014 Snail, Vertigo angustior S1016 Desmoulin's Whorl Snail, Vertigo moulinsiana	The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.
North Norfolk Coast	H1150# Coastal lagoons H1220 Perennial vegetation of stony banks H1420 Mediterranean and thermo-Atlantic halophilous scrubs (Sarcocornetea fruticosi) H2110 Embryonic shifting dunes H2120 Shifting dunes along the shoreline with Ammophila arenaria ('White dunes') H2130# Fixed dunes with herbaceous vegetation ('Grey dunes') H2190 Humid dune slacks S1355 Otter, Lutra lutra S1395 Petalwort, Petalophyllum ralfsii	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats, The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.
Orfordness – Shingle Street	H1150: Coastal Lagoons H1210: Annual vegetation of drift lines H1220: Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.

Overstrand Cliffs	H1230 Vegetated sea cliffs of the Atlantic and Baltic coasts	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.
River Wensum	H3260 Water courses of plain to montane levels with <i>R. fluitantis</i> S1016 Desmoulin's Whorl Snail, <i>Vertigo moulinsiana</i> S1092 Freshwater Crayfish, <i>Austropotamobius pallipes</i> S1096 Brook Lamprey, <i>Lampetra planeri</i> S1163 Bullhead, <i>Cottus gobio</i>	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats of qualifying species The structure and function (including typical species) of qualifying natural habitats The structure and function of the habitats of qualifying species The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely The populations of qualifying species, and, The distribution of qualifying species within the site.
Roydon Common and Dersingham Bog (also Ramsar)	H4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> H4030 European dry heaths	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site

	H7150 Depressions on peat substrates of the Rhynchosporion Mixed lowland valley mire Wetland invertebrate assemblage	contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.
Staverton Park and The Thicks, Wantisden	H9190: Old acidophilous oak woods with <i>Quercus robur</i> on sandy plains; Dry oak-dominated woodland.	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.
The Broads	H7210# Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> S1016 <i>Vertigo moulinsiana</i> : Desmoulin's whorl snail H7230 Alkaline fens H6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) H91E0# Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, <i>Salicion albae</i>) H7140 Transition mires and quaking bogs	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats of qualifying species, The structure and function (including typical species) of qualifying natural habitats, The structure and function of the habitats of qualifying species,

	H3140 Hard oligo-mesotrophic waters with benthic vegetation of Chara spp H3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation S1355 Lutra lutra: Otter S1903 Liparis loeselii: Fen orchid S4056 Anisus vorticulus: Little ramshorn whirlpool snail	The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.
The Paston Great Barn	S1308: Barbastelle bat Barbastella barbastellus	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of the habitats of qualifying species, The structure and function of the habitats of qualifying species, The supporting processes on which the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.
The Wash and North Norfolk Coast	H1110 Sandbanks which are slightly covered by sea water all the time H1140 Mudflats and sandflats not covered by seawater at low tide H1150# Coastal lagoons H1160 Large shallow inlets and bays H1170 Reefs H1310 Salicornia and other annuals colonising mud and sand	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; —

	H1330 Atlantic salt meadows (<i>Glaucopuccinellietalia maritima</i>) H1420 Mediterranean and thermo-Atlantic halophilous scrubs (<i>Sarcocornetea fruticosi</i>) S1355 Otter, <i>Lutra lutra</i> S1365 Harbour (Common) Seal, <i>Phoca vitulina</i>	The extent and distribution of qualifying natural habitats and habitats of qualifying species The structure and function (including typical species) of qualifying natural habitats The structure and function of the habitats of qualifying species The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely The populations of qualifying species, and, The distribution of qualifying species within the site.
Winterton-Horsey Dunes	H2150# Atlantic decalcified fixed dunes (<i>Calluno-Ulicetea</i>) H2190 Humid dune slacks H2110 Embryonic shifting dunes H2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes")	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of the qualifying natural habitats The structure and function (including typical species) of the qualifying natural habitats, and, The supporting processes on which the qualifying natural habitats rely
Special Protection Areas		
Alde-Ore Estuary (also Ramsar site)	A081: Eurasian marsh harrier (breeding) A132: Pied avocet (non-breeding) A132: Pied avocet (breeding) A151: Ruff (non-breeding) A162: Common redshank (non-breeding) A183: Lesser black-backed gull (breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features;

	A191: Sandwich tern (breeding) A195: Little tern (breeding)	The structure and function of the habitats of the qualifying features; The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.
Benacre to Easton Bavents	H1150# Coastal lagoons, A195(B) <i>Sterna albifrons</i> : Little tern A021(B) <i>Botaurus stellaris</i> : Great bittern A081(B) <i>Circus aeruginosus</i> : Eurasian marsh harrier	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features rely, The population of each of the qualifying features, and, The distribution of the qualifying features within the site.
Breckland	Nightjar, <i>Caprimulgus europaeus</i> - A224, b Stone-curlew, <i>Burhinus oedicephalus</i> - A133, b Woodlark, <i>Lullula arborea</i> - A246, b	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features rely, The population of each of the qualifying features, and,

		The distribution of the qualifying features within the site.
Broadlands (also Ramsar site)	H7210# Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> S1016 <i>Vertigo moulinsiana</i>: Desmoulin's whorl snail H7230 Alkaline fens H6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) H91E0# Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, <i>Salicion albae</i>) H7140 Transition mires and quaking bogs H3140 Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara</i> spp H3150 Natural eutrophic lakes with <i>Magnopotamion</i> or <i>Hydrocharition</i>-type vegetation S1355 <i>Lutra lutra</i>: Otter S1903 <i>Liparis loeselii</i>: Fen orchid S4056 <i>Anisus vorticulus</i>: Little ramshorn whirlpool snail	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats of qualifying species, The structure and function (including typical species) of qualifying natural habitats, The structure and function of the habitats of qualifying species, The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.
Deben Estuary (also Ramsar site)	A046a: Dark bellied brent goose (non-breeding) A132: Pied avocet (non-breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features; The structure and function of the habitats of the qualifying features;

		The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.
Great Yarmouth North Denes	Little tern <i>Sterna albifrons</i> - A195, b	Subject to natural change, maintain in favourable condition5 the habitats for the internationally important populations of the regularly occurring Annex 1 bird species, under the Birds Directive, in particular: Sand/shingle areas Shallow coastal waters
Greater Wash	Common Scoter, <i>Melanitta nigra</i> - A065, nb Common Tern, <i>Sterna hirundo</i> - A193, b Little Gull, <i>Hydrocoloeus (Larus) minutus</i> - A177, nb Little Tern, <i>Sternula albifrons</i> - A195, b Red-throated Diver, <i>Gavia stellata</i> - A001-A, nb Sandwich Tern, <i>Thalasseus sandvicensis</i> - A191, b	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features; The structure and function of the habitats of the qualifying features; The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.
Outer Thames Estuary	A001: Red-throated Diver (Non-breeding) A195: Common Tern (Breeding) A193: Little Tern (Breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features; The structure and function of the habitats of the qualifying features;

		The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.
Minsmere to Walberswick (also Ramsar site)	H4030 European dry heaths H1210 Annual vegetation of drift lines H1220 Perennial vegetation of stony banks A052(B) <i>Anas crecca</i>: Eurasian teal A021(B) <i>Botaurus stellaris</i>: Great bittern A081(B) <i>Circus aeruginosus</i>: Eurasian marsh harrier A082(NB) <i>Circus cyaneus</i>: Hen harrier A224(B) <i>Caprimulgus europaeus</i>: European nightjar A056(B) <i>Anas clypeata</i>: Northern shoveler A056(NB) <i>Anas clypeata</i>: Northern shoveler A051(B) <i>Anas strepera</i>: Gadwall A051(NB) <i>Anas strepera</i>: Gadwall A132(B) <i>Recurvirostra avosetta</i>: Pied avocet A195(B) <i>Sterna albifrons</i>: Little tern A394(NB) <i>Anser albifrons albifrons</i>: Greater white-fronted goose	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features rely, The population of each of the qualifying features, and, The distribution of the qualifying features within the site.
North Norfolk Coast (also Ramsar)	Avocet, <i>Recurvirostra avosetta</i> - A132-A, b Bittern, <i>Botaurus stellaris</i> - A021, b Common Tern, <i>Sterna hirundo</i> - A193, b Dark-bellied Brent Goose, <i>Branta bernicla bernicla</i> - A675, nb Knot, <i>Calidris canutus</i> - A143, nb Little Tern, <i>Sternula albifrons</i> - A195, b Marsh Harrier, <i>Circus aeruginosus</i> - A081, b Montagu's Harrier, <i>Circus pygargus</i> - A084, b	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features,

	Pink-footed Goose, <i>Anser brachyrhynchus</i> - A040, nb Sandwich Tern, <i>Thalasseus sandvicensis</i> - A191, b Waterbird assemblage Wigeon, <i>Mareca penelope</i> - A050, nb Marsh and coastal habitats, Red-data book/RDB plants, invertebrates and a lichen Dark-bellied Brent Goose, <i>Branta bernicla</i> - Wintering Knot, <i>Calidris canutus</i> - Wintering Pink-footed Goose, <i>Anser brachyrhynchus</i> - Wintering Waterbird assemblage - Wintering Wetland plant assemblage Wigeon, <i>Mareca penelope</i> - Wintering	The supporting processes on which the habitats of the qualifying features rely, The population of each of the qualifying features, and, The distribution of the qualifying features within the site.
Outer Thames Estuary	A001 (W) <i>Gavia stellata</i> Red-throated Diver A195 (B) <i>Sterna hirundo</i> Common Tern A193 (B) <i>Sternula albifrons</i> Little Tern	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features rely, The population of each of the qualifying features, and, The distribution of the qualifying features within the site.
Sandlings	A224: European nightjar (breeding) A246: Woodlark (breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

		The extent and distribution of the habitats of the qualifying features; The structure and function of the habitats of the qualifying features; The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.
Stour and Orwell Estuaries (also Ramsar site)	A046a: Dark bellied brent goose (non-breeding) A054: Northern pintail (non-breeding) A132: Pied avocet (non-breeding) A141: Grey plover (non-breeding) A143: Red knot (non-breeding) A149: Dunlin (non-breeding) A156: Black-tailed godwit (non-breeding) A162: Common redshank (non-breeding) Waterbird assemblage	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features; The structure and function of the habitats of the qualifying features; The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.
The Wash (also Ramsar)	Bar-tailed Godwit, <i>Limosa lapponica</i> - A157, nb Bewick's Swan, <i>Cygnus columbianus bewickii</i> - A037, nb Black-tailed Godwit, <i>Limosa limosa islandica</i> - A616, nb Common Scoter, <i>Melanitta nigra</i> - A065, nb Common Tern, <i>Sterna hirundo</i> - A193, b Curlew, <i>Numenius arquata</i> - A160, nb Dark-bellied Brent Goose, <i>Branta bernicla bernicla</i> - A675, nb Dunlin, <i>Calidris alpina alpina</i> - A672, nb	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features The structure and function of the habitats of the qualifying features

	Gadwall, <i>Mareca strepera</i> - A051, nb Goldeneye, <i>Bucephala clangula</i> - A067, nb Grey Plover, <i>Pluvialis squatarola</i> - A141, nb Knot, <i>Calidris canutus</i> - A143, nb Little Tern, <i>Sternula albifrons</i> - A195, b Oystercatcher, <i>Haematopus ostralegus</i> - A130, nb Pink-footed Goose, <i>Anser brachyrhynchus</i> - A040, nb Pintail, <i>Anas acuta</i> - A054, nb Redshank, <i>Tringa totanus</i> - A162, nb Sanderling, <i>Calidris alba</i> - A144, nb Shelduck, <i>Tadorna tadorna</i> - A048, nb Turnstone, <i>Arenaria interpres</i> - A169, nb Waterbird assemblage Wigeon, <i>Mareca penelope</i> - A050, nb Bar-tailed Godwit, <i>Limosa lapponica</i> - Wintering Curlew, <i>Numenius arquata</i> - Wintering Dark-bellied Brent Goose, <i>Branta bernicla</i> – Wintering Dunlin, <i>Calidris alpina</i> - Wintering Estuary Grey Plover, <i>Pluvialis squatarola</i> - Wintering Harbour (Common) Seal, <i>Phoca vitulina</i> Knot, <i>Calidris canutus</i> - Wintering Oystercatcher, <i>Haematopus ostralegus</i> - Wintering Pink-footed Goose, <i>Anser brachyrhynchus</i> - Wintering Pintail, <i>Anas acuta</i> - Wintering Redshank, <i>Tringa totanus</i> - Wintering Sanderling, <i>Calidris alba</i> - Wintering Shelduck, <i>Tadorna tadorna</i> - Wintering Turnstone, <i>Arenaria interpres</i> -	The supporting processes on which the habitats of the qualifying features rely The population of each of the qualifying features, and, The distribution of the qualifying features within the site.

	Wintering Waterbird assemblage - Wintering Wetland invertebrate assemblage	

Appendix 4: Natural England Consultation Response

Date: 14 October 2022
Our ref: 405837



Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

Dear Laura Mundy

Natural England's response to the consultation on the draft strategic environmental assessment for the coastal adaptation supplementary planning document

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Thank you for the opportunity to comment on the draft strategic environmental assessment and Habitat Regulations Assessment that relate to the coastal adaptation supplementary planning document.

Summary of response:

- Natural England looked for consistency of language between coastal adaptation supplementary planning document (SPD), the Shoreline Management Plan (SMP) and the Local Plans so that policies can be interpreted clearly and implemented correctly by planners and relevant stakeholders
- We recognise that there is generally a consistency of language between the SPD and the relevant planning policies they relate to (i.e. Local and Neighbourhood Plans)
- The SPD does a good job of explaining the hierarchy of embedded policy details clearly (e.g. Coastal Management Areas are identified in Local Plans which are derived from SMPs)
- We concur with the conclusions of the documents presented to us that the coastal adaptation SPD does not require an EIA
- We also concur with the conclusions of the Habitat Regulations Assessment (HRA) on the coastal adaptation SPD that it will not lead to likely significant effects on protected European sites

Natural England is pleased with the approach and cooperation between the planning authorities across the Norfolk and Suffolk coastline to establish this joined up strategic approach and welcome the delivery of this work, which seeks to establish a consistent interpretation of policies related to coastal change and adaptation along the Norfolk and Suffolk coastline.

We understand that the aim of the SPD is to provide guidance on the correct interpretation of planning policy and aid the implementation of relevant policies and it cannot create new or amend existing planning policies nor can it prescribe that particular areas of land be developed for particular uses. On this basis Natural England does not wish to offer substantive comments on the SPD as this is the role of Development Plans of each Local Authority. However, please see below some very brief comments on the SPD.

Comments

Section 4.29 SPD: *"Open Land Uses Open land uses are likely to be appropriate within the CCMA and indeed may be encouraged as part of the implementation of 'roll-back' proposals and could include Biodiversity Net Gain".* What leavers and/or mechanisms will be used to encourage the implementation of roll-back in this context? A reference to local plan policies would be useful here if available.

Section 4.45 (Table 2): It would be easier to interpret the table if the explanations of Level A and B CEVA" (section 4.47) came before the table.

Section 5.7 and 5.8 SPD: In the "Identifying alternative sites or land" and "Identifying appropriate site sizes" sections of the SPD, there is no reference to European Designated sites in the guidance around identification of alternative and appropriate sites. Natural England would like to point out that any alternative sites should seek to avoid likely significant effects if on or near European Designated sites and not undermine the sites conservation objectives.

General comments - Coastal SPD HRA: Document refers to both Supplementary Planning document and SPD interchangeably. Once the SPD acronym has been introduced, it is more concise to use the abbreviated SPD.

Draft Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment screening opinions

Natural England are satisfied with the conclusions of the SEA and HRA Screening Documents; it is not necessary for a SEA to be undertaken in relation to the SPD and we agree with the conclusion of the HRA Screening Statement. Implementation of the SPD will not lead to likely significant effects on protected European sites and therefore no further assessment is necessary

Should the proposal change, please consult us again.

If you have any queries relating to the advice in this letter please contact me [REDACTED]
[REDACTED]

Yours sincerely

Daniel Turner
Norfolk and Suffolk Team

Equality Impact Assessment Screening Opinion

Draft Coastal Adaptation Supplementary
Planning Document

October 2022



Introduction

1. It is a Council's/Broads Authority's duty under the Equality Act 2010 to undertake an Equality Impact Assessment at the time of formulating a decision, drafting a report, designing or amending a policy. This will ensure that the Council is considering and taking positive action where possible to promote access to services for all their communities, including their wider communities. The Equality Impact Assessment Screening Assessment will assess whether there is any impact upon any of the groups with protected characteristics under the Equalities Act, which are listed in the table below. If an adverse impact upon any of these groups is identified, then a full Equalities Impact Assessment will be required.
2. The Coastal Adaptation SPD is being produced jointly by East Suffolk Council (the lead authority), North Norfolk District Council, Great Yarmouth Borough Council and the Broads Authority. Coastal Partnership East – a single team of coastal officers who work across and for North Norfolk, Great Yarmouth and East Suffolk – are also a partner. This Equality Impact Assessment Screening Assessment has been prepared by East Suffolk Council on behalf of all four authorities.
3. North Norfolk District Council Core Strategy policy EN10 (Development and Flood Risk) provides policy guidance about how development should be planned and managed in relation to flood risk. Policy EN11 (Coastal Erosion) provides policy guidance about development in areas at risk from coastal erosion/change. Policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion risk) provides policy guidance about the relocation and replacement of development damaged or destroyed by coastal erosion.
4. Great Yarmouth Borough Council Local Plan Part 2 includes two policies about flood risk and coastal change. Policy EN1 (Flood Risk) provides policy guidance about development and flood risk. Policy EN2 (Relocation from Coastal Change Management Areas) provides guidance about the relocation of development away from areas that are experiencing coastal change.
5. East Suffolk District Council was formed by the merger of Suffolk Coastal District Council and Waveney District Council in 2019. Both of the former Districts have adopted local plans, which contain policy guidance about coastal change and adaptation. Suffolk Coastal Local Plan policy SCLP9.3 (Coastal Change Management Area) sets out the policy position regarding development in areas that area at risk from coastal erosion/change. SCLP9.4

Commented [na1]: Councils' as in there is more than one. But this term does not include us... LPAs'?

Insert website address for SPD consultation

(Coastal Change Rollback or Relocation) provides policy guidance about the relocation of development that has been impacted or destroyed by coastal change, including the provision of replacement housing. Waveney Local Plan policy WLP8.25 (Coastal Change Management Area) provides policy guidance about development within areas impacted by coastal change. Policy WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion) provides policy guidance for development that has been damaged or destroyed by coastal change, which includes providing replacement housing in a safer location.

6. There are no policies in the Broads Local Plan that directly relate to coastal change adaptation, although there is a policy relating to the short stretch of coast in the Broads Authority Executive Area.

Commented [na2]: but there is a policy relating to the short stretch of coast in the Broads Authority Executive Area....

7. The Coastal Adaptation Supplementary Planning Document (SPD) provides information and guidance to help communities to cope with the impact of coastal change. Much of the coastal area of this part of East Anglia – especially undefended coastlines – are experiencing rapidly changing coastlines due to erosion. This can lead to the damage or loss of housing and property, as well as land more generally.
8. The Coastal Adaptation SPD seeks to provide additional guidance which will help to deliver the North Norfolk, Great Yarmouth, Suffolk Coastal, Waveney and the Broads Authority Local Plan policies summarised above. The SPD is divided into the following chapters:

Introduction

9. This chapter sets out the purpose of the SPD and explains who has been involved in its preparation. This includes providing definitions of two key terms: partnership authorities and partnership. The former includes East Suffolk Council, North Norfolk District Council, Great Yarmouth Borough Council and the Broads. The latter includes East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads and CPE.

Chapter 1 – Context: Homes, Businesses, Communities and Environments affected by Coastal Change

10. This chapter provides the context in which the Coastal Adaptation SPD is being produced and is divided into three key sections, as set out below:

Insert website address for SPD consultation

1. What are the geology and coastal processes affecting the coastline?
2. What are the economic, social and environmental benefits enjoyed along the coastline and how are they affected by coastal processes?
3. How is and will climate change affect the coastline?

Chapter 2 – Coastal Management Measures and Policies

11. This chapter provides an overview of the planning policy and guidance context for the SPD, at both the national and local level. The chapter explains that local authorities along the Norfolk and Suffolk Coast work together to implement Integrated Coastal Zone Management, or ICZM. This is a holistic approach to managing coastal change. At the national level, coastal change is covered by the Coastal Erosion Risk Management Policy Statement and the National Planning Policy Statement (NPPF). The NPPF implements the ICZM approach and requires local authorities to create Coastal Change Management Areas. The Planning Practice Guidance on Flood Risk and Coastal Change is also relevant. The text also explains the boundary between the marine and terrestrial planning systems.
12. At the local level the suite of documents includes Shoreline Management Plans, Local Plans and Neighbourhood Plans and the chapter describes the objectives for each document in terms of managing coastal change. It also lists the Local Plans which are covered by the Coastal Adaptation Supplementary Planning Document. It outlines key policies from each of the Local Plans covered by the SPD which relate to Coastal Change Management Areas and Coastal Rollback.

Chapter 3 – Development in the Coastal Change Management Area

13. This chapter provides an explanation of what a Coastal Change Management Area is and summarises the guidance contained in the Planning Practice Guidance. The chapter then provides an explanation of policy about the different types of development that can occur within coastal change management areas, including permitted development. The final section of the chapter provides an overview of the Coastal Erosion Vulnerability Assessment (CEVA), which is used to assess whether a proposed development will be appropriate and seeks to balance the need to maintain the viability of coastal communities against the threat from coastal erosion/change.

Chapter 4 – Rollback and Relocation

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14. This chapter sets out the National Planning Practice Guidance relating to rollback and relocation, as well as the Local Plan policies. The chapter provides guidance about when the rollback/relocation of homes and businesses affected by coastal erosion/change would be acceptable and appropriate.

Chapter 5 – ‘Enabling’ Development

15. This chapter explains the concept of enabling development, which is a development that is contrary to policy but is permitted because its public benefits outweigh policy considerations. This is then applied to development that enables the relocation of homes and businesses impacted by coastal change. The chapter provides information about a range of different types of development that are impacted by coastal change and set out, when enabling development may be required and what viability information will be necessary to demonstrate an enabling development case.

Appendices

16. There are also six appendices:
- i) Norfolk and Suffolk Coastal Authorities Statement of Common Ground
 - ii) Organisation roles and responsibilities
 - iii) Coastal Erosion Vulnerability Assessments Level A & B
 - iv) Case studies
 - v) Neighbourhood Plan Guidance
 - vi) Glossary

Equality Act 2010

- vii) The Equality Act 2010 lists nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation. A tenth characteristic, socio-economic deprivation, is considered in addition to the nine protected characteristics listed in the legislation. This reflects that pockets of deprivation that exist across the SPD area.

Insert website address for SPD consultation

Screening of impact on different groups

	Groups	Likely Impact (positive/negative/no impact)	Reason for your decision
a	Age (Includes safeguarding issues)	No impact	The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group. Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language). The draft SPD consultation will therefore not discriminate against those from different age groups.
b	Disability	No impact	The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group.

Insert website address for SPD consultation

			Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language). The draft SPD consultation will therefore not discriminate against those with any disability/ies.
C	Gender reassignment	No impact	The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group. Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language). The draft SPD consultation will therefore not discriminate against those who have undergone gender reassignment.

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D	Marriage and Civil Partnership	No impact	The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group. Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language). The draft SPD consultation will therefore not discriminate against those who are married or in a civil partnership.
E	Pregnancy and maternity	No impact	The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group. Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service

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			centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language). The draft consultation SPD will therefore not discriminate against those who are pregnant or mothers.
F	Race	No impact	The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group. Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language). The draft SPD consultation will therefore not discriminate against those from different racial backgrounds.
G	Religion or Belief	No impact	The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that

Insert website address for SPD consultation

			are at risk from coastal change. It will therefore not discriminate against this group. Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language). The consultation will therefore not discriminate against those different religions or beliefs.
H	Sex	No impact	The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group. Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language).

Insert website address for SPD consultation

			The draft SPD consultation will therefore not discriminate in terms of sexual identity.
I	Sexual orientation	No impact	The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group. Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language). The consultation will therefore not discriminate in terms of sexual orientation.
J	Socio-economic deprivation	No impact	The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group. Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online,

Insert website address for SPD consultation

			in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language). The consultation will therefore not discriminate against those who are experiencing economic or social deprivation.

Consultation and Engagement

There was an initial process of consultation that guided the preparation of the Coastal Adaptation SPD, which ran from 4th September 2020 to 16th October 2020. This initial stage of consultation was led by East Suffolk Council but all four organisations were involved in promoting the consultation. The purpose of the initial consultation was to inform the content of the Coastal Adaptation SPD. The consultation took the form of a short document that set out the main aims of the Coastal Adaptation SPD, the local planning policy background relating to development and coastal change and a proposed list of contents. The latter part of the consultation document took the form of a series of questions, the answers to which will inform the content of the future Coastal Adaptation SPD. The consultation document was published on East Suffolk Council's consultation portal and advertised on the Council's website and on social media. Consultees on each of the four authorities' mailing lists were also contacted.

In view of the Covid-19 social distancing measures that prevailed during the initial consultation, the Council had set out measures to enable safe participation in the consultation and to ensure that those who wish to engage in the consultation are not disadvantaged. The Council would normally have made hard copies of consultation documents available to view in libraries and in the Council's offices for those who are unable to view them online, however as this was not possible to do this at this time due to the Covid-19 pandemic the Council put alternative measures in place. For those unable to view the consultation documents online, hard copies were made available on request (free of charge) by post. In view of these measures the Council did not consider that this initial consultation disadvantaged any of the groups covered by this EQIA screening exercise.

Insert website address for SPD consultation

A formal public consultation on the Draft Coastal Adaptation SPD will take place from January 2023 for six weeks. Consultation letters and emails will be sent to consultees on the LPAs' Planning Policy mailing lists. The planning policy mailing lists includes Town and Parish Councils, Suffolk and Norfolk County Councils, neighbouring district councils, developers, agents, landowners, business associations, civic societies, infrastructure providers, and members of the public. A press release will be prepared, and it will be publicised through the councils' social media channels too.

Copies of consultation documents will be available online, and hard copies made available for inspection in libraries and in the LPAs' customer service centres (as appropriate).

Anyone who is unable to view the consultation documents online, in libraries or in the Customer Service Centres can contact the relevant council/authority, and the publicity material provides contact details and an offer of assistance.

Presentation in Different Languages

As part of a six-week period of formal consultation, the document will be published on the LPAs' websites, with hard copies available on request for those unable to access it online. The document may also be requested in a different language. When such requests are received, the Customer Services Team will be involved with ensuring this request is actioned.

Proposed Changes

The LPAs will analyse responses received during the public consultation and will make any appropriate changes as a result of comments received.

Conclusion

This EQIA screening exercise shows that the Coastal Adaptation SPD will not negatively impact upon any protected group or those experiencing socio-economic deprivation. Therefore, a full EQIA assessment is not considered necessary.

Insert website address for SPD consultation

URN:

Subject: New Local Plan – Options Consultation

Report to: Policy and Resources Committee – 6th December 2022

Report by: Samuel Hubbard – Strategic Planning Manager

SUBJECT MATTER

This report seeks approval to conduct a consultation on the new Local Plan for the Borough.

RECOMMENDATION

That Policy and Resources Committee:

- Approve the consultation document on the new Local Plan appended to this report (Appendix 1)

1. Introduction

- 1.1. The Council's recently adopted Local Plan Part 2 commits the Council to an immediate review of the Core Strategy (Local Plan Part 1) and the Local Plan Part 2. This is due to the age of the Core Strategy, updates to evidence and changes in national planning policy. The new plan will be a single plan covering the strategy, site allocations and detailed policies. The plan will cover a period to 2041 to ensure a 15-year coverage of strategic policies on adoption in line with the National Planning Policy Framework.
- 1.2. Work has already begun on the preparation of the new plan. Following approval by Policy and Resources Committee in May a 'Call for Sites' was issued over the summer of 2022. This was an opportunity for individuals, landowners, developers, parish councils and other interested parties to let the Council know what sites may be suitable for inclusion in the new Local Plan for development. Sites for potential housing development, gypsy and traveller accommodation, commercial development, renewable energy or other types of development were invited to be submitted. The Council also wrote directly to landowners of vacant and agricultural land within and adjacent to the settlements in the Borough. Additionally, the Council asked stakeholders and the public to submit sites for consideration as Local Green Spaces.
- 1.3. Alongside this, several evidence studies have been prepared to support the new Local Plan on housing needs (including gypsy and traveller accommodation), employment needs, open spaces and sports facilities and transport.

- 1.4. The Local Development Scheme, which sets out the timetable for the preparation of the Local Plan, was approved by Policy and Resources committee in May and commits the Council to undertaking an initial consultation on options for the Local Plan over this autumn/winter. This initial consultation covers the key issues the Local Plan will need to address. It also involves a consultation on the sites submitted through the call for sites process.
- 1.5. A draft consultation document to fulfil this stage of Local Plan preparation is included in Appendix 1 to this report. Please note the consultation document presented in Appendix 1 is yet to be fully formatted. The consultation document will be presented as a fully interactive consultation document on the Council's website alongside a formatted hard-copy consultation document for those who cannot access the internet easily.
- 1.6. The Council's Local Plan Working Party have reviewed and endorsed the consultation document.

2. Content of the Consultation

- 2.1. This stage of the Local Plan preparation is about understanding what the public and other stakeholders want the Local Plan to address and gather early views on some of the key matters the Local Plan needs to address. This consultation does not set out a preferred position of the Council on any of the main issues or strategy or policy approaches. At this stage it is important for the Council to keep an open mind to give the public and stakeholders the maximum opportunity to help shape the plan from an early stage. Similarly, no assessment has been undertaken of the sites presented in the consultation. However, with regard to local green spaces, only those which meet the strict criteria set out in the National Planning Policy Framework have been presented in consultation document.
- 2.2. In summary this consultation seeks views on:
 - the amount of development we should be planning for
 - how development could be distributed across the Borough
 - what infrastructure and community facilities are required to support development
 - what can we do to regenerate and improve Great Yarmouth
 - how we should plan to meet the housing needs of the whole population including gypsies and travellers
 - how we should plan for future economic development
 - how we should plan for climate change
 - how we should plan to ensure protection and enhancement of the natural and historic environment
 - Potential sites for development
 - Potential sites for renewable energy
 - Potential sites to be designated as Local Green Spaces
- 2.3. The consultation is presented in the form of a series of questions designed to get feedback on the key issues. The consultation has been kept as concise as possible in order to make it

accessible to range of audiences. The proposed interactive format will make it easy for people to navigate to the part of the consultation they are most interested in.

3. Approach to Consultation

- 3.1. In undertaking the consultation an interactive version of the document included in Appendix 1 and interactive maps will be published on the website. The interactive nature of the document will allow consultees to zoom and query the maps and respond to the questions using online surveys.
- 3.2. In line with the Council's Statement of Community Involvement, at the start of the consultation the Council will notify:
 - Council's Local Plan Mailing List
 - Statutory consultees
 - Parish Councils
 - Interest groups, including environmental, amenity and local community and voluntary groups
 - Developer Forum
 - Neighbouring authorities
 - Ward councillors
- 3.3. A press release will also be issued and the consultation will be advertised on the Council's social media channels.
- 3.4. Hard copies of the document included in Appendix 1 will also be made available at the Town Hall and libraries and we will send free hard copies of documentation to those on the Council's Local Plan Mailing List.
- 3.5. It is intended that we will hold a drop-in event at the Town Hall, where members of public and other stakeholders can come and discuss the consultation with officers. We also hope to organise an event with local schools and colleges to get the views of younger people who are often less likely to engage in planning consultations.

4. Next Steps

- 4.1. Given the forthcoming Christmas holidays, it is proposed that the consultation begins in early January and last for 6 weeks. This represents a slight slippage from the timetable set out in the Local Development Scheme. However, it shouldn't impact upon the overall timetable for local plan preparation as set out below:
 - First Draft Local Plan Consultation: Summer 2023
 - Final Draft Local Plan publication: Spring 2024
 - Submission of Final Draft Local Plan for Examination: Spring 2024
 - Examination: Spring 2024 – Spring 2025
 - Adoption: Spring 2025

- 4.2. Following this consultation, all comments will be reviewed and considered by the Local Plan Working Party. Officers will then work with the Local plan Working Party to develop the first draft plan in response to these comments and the emerging evidence base.

5. Financial Implications

- 5.1. No additional implications. Preparation of the Local Plan and other documents is provided for in the agreed Strategic Planning budget.

6. Legal and Risk Implications

- 6.1. The consultation will form part of the engagement required by regulation 18 of the Town and County Planning (Local Planning) Regulations 2012 (as amended). The consultation will take place in accordance with the Council's adopted Statement of Community Involvement (2022).

7. Conclusion

- 7.1. It is recommended that Policy and Resources Committee:
- Approves the consultation document on the new Local Plan appended to this report (Appendix 1)

8. Appendices

Appendices:

- Appendix 1 – Great Yarmouth New Local Plan – Options Consultation

Area for consideration	Comment
Monitoring Officer Consultation:	Through ELT prior to Policy and Resources Committee
Section 151 Officer Consultation:	Through ELT prior to Policy and Resources Committee
Existing Council Policies:	Local Plan Part 1 (Core Strategy), Local Plan Part 2 & Corporate Plan
Financial Implications (including VAT and tax):	Addressed in the report
Legal Implications (including human rights):	Addressed in the report
Risk Implications:	Addressed in the report
Equality Issues/EQIA assessment:	n/a
Crime & Disorder:	n/a
Every Child Matters:	n/a

Great Yarmouth New Local Plan – Options Consultation

Unformatted Hard-Copy Version for Committee.

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Introduction

The Local Plan is a key document which sets out a vision and framework for the future development of the area. The Local Plan sets out the amount of development which needs to be planned in an area and identifies where that development should go and how it should be delivered. The Local Plan also sets out planning policies which are used to help determine planning applications for development.

The current Local Plan for Great Yarmouth is split over two documents, [the Core Strategy](#) (adopted in 2015) and the [Local Plan Part 2](#) (adopted in 2021).

Great Yarmouth Borough Council is currently progressing a review of the whole Local Plan. The new Local Plan will eventually replace the Core Strategy and the Local Plan Part 2. It is intended the new Local Plan will be a single document, rather than being separate local plans covering strategy, allocations and detailed policies.

The new Local Plan will cover the period to 2041.

The plan will not cover the part of the borough which falls within the Broads Authority. The Broads Authority are currently preparing a [new Local Plan](#) for their area.

The Local Plan will sit alongside [Neighbourhood Plans](#) as part of the 'development plan' for the area. Existing Neighbourhood Plans will be taken into account in preparing the new Local Plan and the plan will set a framework for new Neighbourhood Plans to be prepared against.

Overview of Consultation

This consultation aims to get your views on some of the key matters the new Local Plan will need to contain. The consultation comprises a series of questions to help the Council prepare the Local Plan. These questions can be responded to using our online survey.

The Council issued a Call for Sites over the summer of 2022 which was an opportunity for individuals, landowners, developers, parish councils and other interested parties to let the Council know what sites may be suitable for inclusion in the new Local Plan for development. The Borough Council asked for sites for potential housing development, gypsy and traveller accommodation, commercial development, renewable energy, or other types of development. The Council also wrote directly to landowners of vacant and agricultural land within and adjacent to the settlements in the borough. Additionally, the Council asked stakeholders and the public to submit sites for consideration as Local Green Spaces. This consultation provides an opportunity to comment on those sites received.

In summary this consultation seeks views on:

- the amount of development we should be planning for
- how development could be distributed across the borough
- what infrastructure and community facilities are required to support development
- what can we do to regenerate and improve Great Yarmouth
- how we should plan to meet the housing needs of the whole population including gypsies and travellers
- how we should plan for future economic development

- how we should plan for climate change.
- how we should plan to ensure protection and enhancement of the natural and historic environment
- Potential sites for development
- Potential sites for renewable energy
- Potential sites to be designated as Local Green Spaces

Next Steps

Following this consultation, the Council will carefully consider all the responses made. The Council will then prepare a first draft of the Local Plan which takes into account the comments made during this consultation. The current timetable for the subsequent stages of Local Plan preparation are as follows:

- First Draft Local Plan Consultation: Summer 2023
- Final Draft Local Plan publication: Spring 2024
- Submission of Final Draft Local Plan for Examination: Spring 2024
- Examination: Spring 2024 – Winter 2025
- Adoption: Spring 2025

Vision

The new Local Plan will need to contain a vision and set of objectives to frame what the plan is seeking to achieve in terms of the development of the borough. The vision will be influenced by the Council's Corporate Plan and priorities and the issues identified in the Sustainability Appraisal Scoping Report. The following questions are intended to help shape and refine a vision for the plan:

Question 1

a) What is good about living or working in the borough of Great Yarmouth and b) what is good about living or working in the town or village you live/work in?

b) What is not so good about living or working in the borough of Great Yarmouth and b) what is not so good about living or working in the town or village you live/work in?

Question 2

What would be your vision for the borough for 2041?

How much development should we plan for?

It is important that the Local Plan ensures there is sufficient land available to meet needs for new homes and economic development.

Housing Needs

Over time household sizes in Great Yarmouth are getting smaller, this means for the same population more homes are needed. Additionally, more people migrate into the borough than leave (mainly from other parts of the UK). These factors mean there is a need for new housing to be built in the borough. If we don't plan to meet these needs, demand can outweigh supply meaning steeper rises in house prices which can make it more difficult for people to enter the housing market.

[National planning policy](#) requires local plans to identify housing needs using a [standard methodology](#). This methodology involves looking at average household growth forecasts published by the Government and applying an uplift based on the affordability of housing in the area (ratio of earnings to house prices). For Great Yarmouth this is calculated as follows as set out in the Council's [Local Housing Needs Assessment 2022](#):

- Annual average projected household growth = 308 homes per year
- Affordability uplift = 44
- Annual housing need = 353

This means that over the plan period from 2021 to 2041, **7,060** homes need to be built to meet needs. Many of these homes already benefit from planning permission or allocation in the existing Local Plan (4,032 homes) and some have been built since 2021 (362 homes). This means the Local Plan will need to ensure provision of at least a further 2,666 homes.

Whilst the housing requirement from the standard method is the minimum amount of housing it is common for local plans to either set a higher target or to plan and allocate land for more housing than the minimum requirement set as a target. The reasons for such a buffer are:

- To ensure resilience in delivery of homes in case some sites don't come forward or delivery slows on some sites.
- To ensure a greater delivery of affordable homes
- To ensure sufficient housing to provide workers to support local economic growth
- To ensure there is sufficient land available in case of changing circumstances in terms of needs.

The [current Local Plan](#) for Great Yarmouth allocates sufficient land to deliver 32% more homes than the housing requirement (which is based on the standard method at the time of adoption). This was a comparatively high-level of over provision and reflected the low number of years left of the plan period for that plan at the time of adoption of the Local Plan Part 2.

Question 3

Is the target of 353 homes a year, equating to 7,060 between 2021 and 2041, the most appropriate housing requirement for the plan?

Question 4

Should the Local Plan provide for more homes than the minimum requirement of 7,060?

Gypsy and Traveller Needs

National policy requires the identification of sufficient sites within local plans to meet the needs of the local gypsy and traveller population. Evidence from the Council's [Gypsy, Traveller and Residential Caravan Accommodation Needs Assessment 2022](#) indicates that there is a borough-wide need for up to 25 new permanent pitches for gypsy and travellers by 2041. By ensuring that the plan meet this need, this will in turn help to prevent unauthorised sites occurring in the borough in the future.

Question 5

Is the identified need for new gypsy and traveller permanent pitches appropriate, do you have any other evidence on future gypsy and traveller needs which could inform the Local Plan?

Economic Needs

Economic forecasts as discussed in the Council's Employment Land Needs Assessment 2022 indicate there will be between 1,400 and 4,400 new jobs over the plan period in Great Yarmouth. The largest growth sectors are healthcare, accommodation and food services, and business services. Given the potential for opportunities associated with the growing offshore renewables and engineering sector, there could be opportunity for more jobs than forecasted. However, clearly at present there is some uncertainty as to the level of likely jobs growth, particularly given the after-effects of the Covid-19 pandemic and the increasing inflation. Nevertheless, the plan needs to ensure there is sufficient land available to ensure the potential for economic growth is not constrained.

The Employment Land Needs Assessment recommended ensuring approximately 39 hectares of land is available for new offices and industrial development within the Local Plan. To meet this need there is currently undeveloped land of 19.38 hectares within existing industrial estates that may be suitable for further employment uses. The existing Local Plan also contains a 20.12 hectare allocation for new employment development at Beacon Park which could be carried forward into this Local Plan and help meet needs. Together these would provide 39.5 hectares of land for employment uses.

The Council's [Retail Capacity Study \(2020\)](#) indicates there will be limited need for new retail developments within the borough. The study estimates that the over the period to 2040 only 246sqm of convenience floorspace needed within the borough and no new floorspace is needed for non-food retail.

Question 6

Do you think the economic forecasts of between 1,400 and 4,400 new jobs over the plan period are realistic, do you have any other evidence on economic growth that could inform the Local Plan?

Question 7

Should we be planning for more or less than 39 hectares of land for new office and industrial development?

Question 8

Do the retail development need forecasts seem realistic, do you have any other evidence on retail needs which could inform the Local Plan?

Where should new development be focussed within the borough?

[National Planning Policy](#) requires local plans to promote a sustainable pattern of development which improves the environment, mitigates climate change, makes effective use of brownfield land, supports the vitality of rural communities, support town centres and helps achieve healthy active communities.

The existing Local Plan focusses 65% of new development within the urban area of Great Yarmouth, Gorleston and Bradwell and village of Caister-on-Sea. The remainder is focussed on the larger villages in the rural areas to the north and south of the borough.

A key consideration for the new Local Plan will be whether to continue with the current distribution or allocate more or less development to the urban or rural areas of the borough.

More development allocated to the urban area means there is less need for people to travel due to the better service provision which reduces congestion and carbon emissions and facilitates people to walk and cycle to work which helps support a healthier population. However, there are limited opportunities for development on brownfield sites and viability and flood risk constraints means it may be difficult to allocate a large proportion of growth to the urban area. It is likely that to accommodate growth within the urban areas, some agricultural land on the edge of Gorleston and Bradwell would be required.

More development within the rural area can help support existing services and facilities in villages, such as schools, pubs and villages shops and ensure they remain viable. House prices are generally less affordable in rural area and increased development can allow for more affordable homes to be built. However, development in rural areas can increase the need to travel for work and services, which in turn can increase congestion, carbon emissions and limit the ability to for people to make healthier choices in the way they commute and access services. There are very limited opportunities for brownfield development in the rural areas and therefore agricultural land on the edge of villages will be needed.

A further constraint affecting development in the south of the borough along the A143 corridor is the congestion experienced at the A143 Beccles Road/Mill Lane/Church Lane/Long Lane junction. Traffic studies indicate that there is very limited capacity for development to the south-west of the borough due to these constraints. One possible strategic solution could be to create a link road connecting the A143 to Market Road as part of a large development to the west of Bradwell. This would mean distributing the majority of growth (up to 2000 homes) to the west of Bradwell in order to fund and deliver this link road. At present it is unclear whether this would entirely resolve the situation or whether it would be deliverable, particularly given not all the land required has been submitted to the Council as part of the Call for Sites. Notwithstanding this, the Council is keen to hear views on this possible option.

Caister-on-Sea is the largest village in the borough and acts as a key service centre to many of the villages in the north of the borough. It benefits from a good range of services and facilities, has good connections into Great Yarmouth and has some employment opportunities, particularly in the tourism sector. The new Local Plan will need to carefully consider the role of Caister-on-Sea in accommodating new development. There is potential for further development to the west of the village adjacent the recently permitted scheme off Jack Chase Way and some opportunities to the north-east of the village as shown on the potential sites map in the next section.

Elsewhere, the Local Plan will need to consider the role of each village and which villages are best suited for accommodating new development.

Most office and industrial development is located in the urban area where there are large industrial estates, business parks and town centre offices. It is likely that these areas will be the focus for new development, but we will also need to consider whether there is scope for industrial development elsewhere in the more rural parts of the borough

Question 9

Should new housing development be more focussed in the urban (Great Yarmouth, Gorleston and Bradwell) or the rural parts of the borough or an equal balance between the two areas?

Question 10

a) Should future development be focussed in Bradwell in order to deliver a potential link road between the A143 and Market Road?

B) do you think such a link road would help address traffic congestion at the A143/Mill Lane/Church Lane/Long Lane traffic lights or are there any other solutions?

Question 11

Should Caister-on-Sea be a focus for new housing development in the borough?

Question 12

Which villages do you think are most suitable for new housing development?

Question 13

Should the Local plan seek to allocate employment areas outside of the urban area of Great Yarmouth, Gorleston and Bradwell?

Potential Sites for Development

The Council issued a Call for Sites over the summer of 2022 which was an opportunity for individuals, landowners, developers, parish councils and other interested parties to let the Council know what sites may be suitable for inclusion in the new Local Plan for development.

We are now seeking your views on whether you think any of the sites submitted could be suitable for development and therefore allocated in the new Local Plan.

Please note, more sites have been submitted than what will be needed to accommodate development needed in the borough and therefore many of the sites presented in this consultation will not be needed to meet development needs. We are publishing all of the sites submitted with no pre-filtering on potential suitability. This is so everyone is aware of all the possible options and have an opportunity to consider and comment on them at this early stage of Local Plan preparation.

The Council, taking into account the views expressed as part of this consultation, will thoroughly assess all the sites, and filter the sites down to a smaller number of sites which can meet the development needs of the borough in line with any distribution strategy determined as discussed above.

The site submitted for consideration can be seen in Appendix 1.

As part of this consultation the Council welcomes further sites to be submitted for consideration for allocation in the new Local Plan.

Gypsies and Travellers

There is one gypsy and traveller site in the borough which is located off Gapton Hall Road. This provides for 24 pitches (18 permanent, 6 transit pitches) and is managed by the Council. The current Local Plan safeguards the site for gypsy and traveller use as well as allowing for the potential extension of the site to be explored to meet future needs.

Whilst this site is well established within the existing community, it is in need of investment and upgrading to meet current gypsy and traveller living standards. The size of the site is also at the upper limit of what is normally considered appropriate for any single gypsy and traveller site. Furthermore, the site is surrounded by land that is at a high risk of flooding. For these reasons it is unlikely that either an extension to, or intensification of, the existing will be suitable or appropriate in order to help meet the borough's future need. Therefore, the new Local Plan will need to consider how additional sites for gypsy and travellers can be brought forward during the plan period to ensure it meets its future need.

The existing Local Plan only identified a limited requirement for new gypsy and traveller pitches and therefore used a criteria-based policy to help identify and determine planning applications for new sites in the absence of any formal plan allocations. These criteria require new sites to have good transport links and easy travelling distance to schools, services and shops; have adequate sewerage connections and not in a flood zone; that there will be no adverse impacts on nearby residents or land users; will have minimal impact on the character of the countryside; and will not harm areas of landscape or biodiversity importance.

A reliance upon this criteria-based policy alone in the new Local Plan may not provide for sufficient sites to come forward in a timely way, increasing the future likelihood of unauthorised sites occurring in the borough. Therefore, it is considered necessary that some new sites for gypsies and travellers will need to be allocated through the new Local Plan. No sites have been put forward to date through the 'Call for Sites' process for gypsy and traveller accommodation. However, we would welcome your views on whether any of the sites submitted (as shown in Appendix 1) could be suitable for gypsy and traveller accommodation, either alone or as a part of a mixed-use development.

Question 14

Are there any reasons for not allocating new sites for gypsy and travellers in the Local Plan, instead relying upon the existing criteria-based policy to determine planning applications for new gypsy and traveller sites as and when they come forward?

Question 15

Are there any other locational factors that the Council should take into account when seeking to identify new sites for gypsies and travellers?

Question 16

Would any of the sites put forward through the 'Call for Sites' shown in Appendix 1 be suitable for Gypsy and Traveller accommodation?

Development Limits

The Local Plan will need to give clear signals to developers, the community and infrastructure providers about where development will take place and where it will not take place. The plan will identify specific sites for development to meet needs. Similar to many other local plans, the existing Great Yarmouth Local Plan also supports infill development and development on unallocated sites within the built-up areas of settlements. It has a policy which identifies Development Limits which are drawn around built-up areas and supports development within them but restricts development outside of them.

This policy approach helps guide the location, type and amount of development to ensure it delivers, and is consistent with, the overall strategy for development. Development Limits also help to avoid urban/suburban sprawl, the unplanned coalescence of settlements and unnecessary loss of agricultural and undeveloped land. This is particularly important in Great Yarmouth borough given that much of the agricultural land is high grade. Development Limits can also help reduce the 'hope value' of land outside of settlements which may make it more viable for certain types of development such as 100% affordable housing schemes and schemes for the relocation of properties at risk from coastal erosion.

However, there are other approaches to achieving such policy goals, such as simply having a policy which supports the development of brownfield sites and infill developments but restricting development of vacant and agricultural land on the edge of settlements where it hasn't been specifically allocated in the Local Plan.

Question 17

Should the new Local Plan retain the policy of Development Limits, or should it take a different approach?

Infrastructure

Strategic Infrastructure

There are a number of strategic infrastructure projects currently under development within Great Yarmouth. These projects will help unlock and provide new opportunities for development.

Third Crossing

The third crossing over the River Yare in Great Yarmouth links the A47 to South Denes and provides a third access to the town. The bridge will ease traffic journeys and reduce journey times and increase journey reliability. The development should help support regeneration and economic growth opportunities in the town and the wider borough. The bridge will be open in May 2023.

New James Paget Hospital

The James Paget Hospital is eligible for funding to develop a new hospital. The new hospital is proposed to be located to the rear of the existing hospital. It is expected that the new hospital will be operational by 2030.

Great Yarmouth Flood Defences

The Environment Agency is currently refurbishing and improving approximately 4km of flood defences and the supporting quayside. It is anticipated that the work will allow a further 30 years of life to be gained from the assets and manage the flood risk to around 2000 homes and 700 businesses. Future epochs of work will provide additional protection to other properties in the town. The flood defences support the economic growth and development of Great Yarmouth with the potential to support 34,000 jobs and £1.5 billion to the economy over the lifetime of the epochs.

Question 18

What opportunities do you think could be exploited in the Local Plan following the delivering of the above strategic infrastructure projects?

Infrastructure Needs

Development proposed in the new Local Plan needs to be supported by adequate infrastructure including, schools, medical facilities, community facilities, open spaces and transport infrastructure such as cycle paths, pedestrian infrastructure and improvements to roads. Developers are often required to make financial contributions towards improvements to infrastructure and make land available for such infrastructure to meet the needs generated by their developments. Emerging legislation will require the Council to introduce a new levy on developments which will require all developers to make a financial contribution towards infrastructure provision in the area.

Question 19

What infrastructure do you think is required to support new development in the borough and in your community?

Urban and Waterfront Regeneration

The existing Local Plan ([Policy CS17](#)) sought to facilitate regeneration of the Great Yarmouth waterfront comprising riverside areas at Vauxhall, Fuller's Hill, North Quay, The Conge, Bure Harbour Quay and Ice House Quay. It was expected that the regeneration proposals would provide an opportunity to develop high quality waterfront housing (approximately 1000 homes), overlooking the river and historic quays alongside new commercial properties. There was recognition that the project would run beyond the plan period (which was up to March 2030), with the delivery of the majority of housing, employment and retail and leisure taking place after that date. Constraints associated with land ownership, contamination and flood risk have held back progress, and impact upon the viability of development.

Progress has been made in respect of the areas at North Quay and The Conge. The Council is currently assembling land within North Quay to support regeneration and has secured planning permission for a high-quality residential development of 89 homes along the Conge.

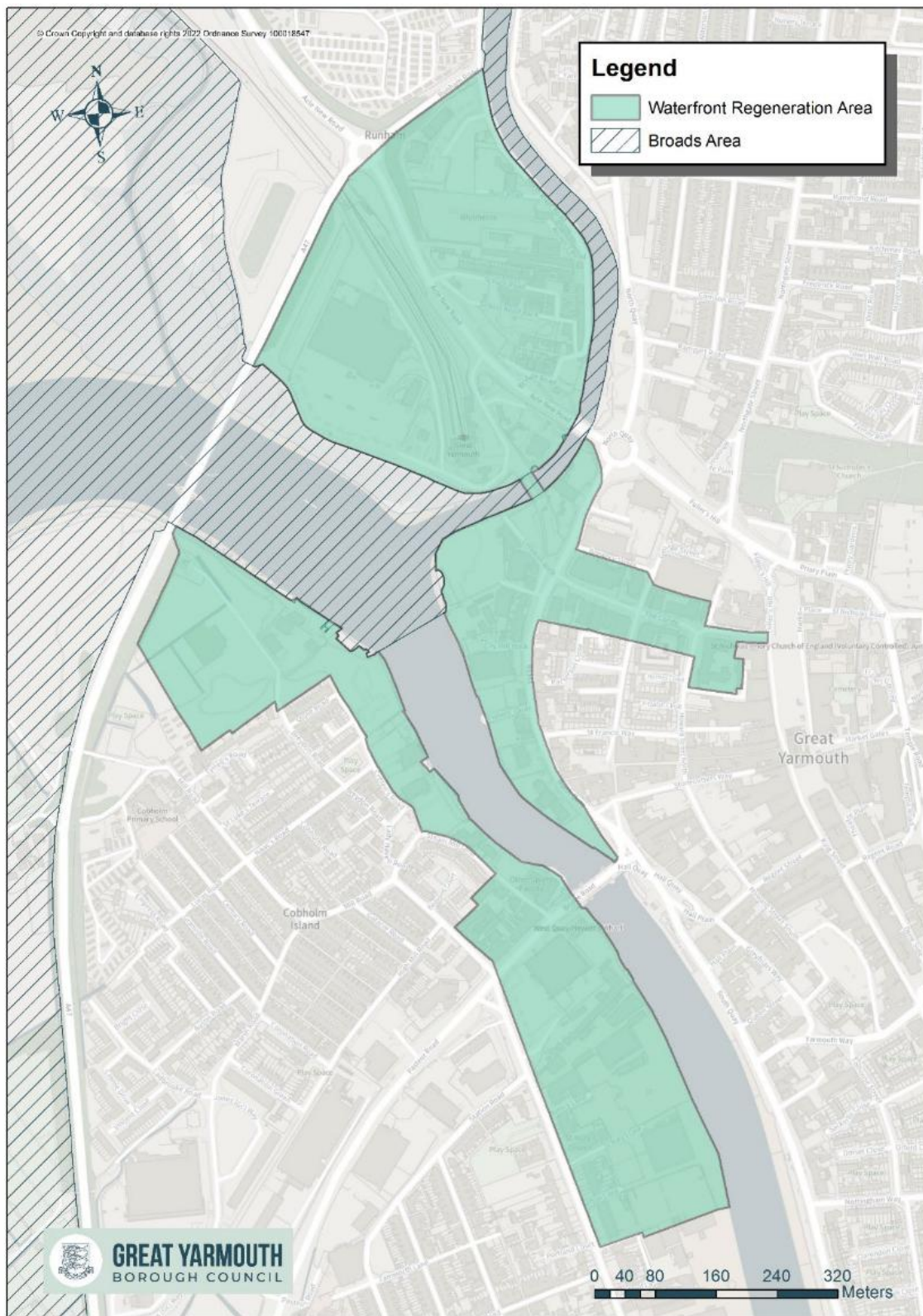


Figure 1 - Waterfront areas identified in existing Local Plan

The Government is also keen to support regeneration as set out in the national planning and through its wider 'Levelling Up' agenda. The Borough Council has been successful in attracting significant external funding through the likes of the 'Town Deal'. As part of this bid a [Town Investment Plan](#) was drawn up to identify a wider sweet of key projects such as the renovation of Palmers department store to relocate the public library or support to deliver a new Offshore & Maintenance facility at South Denes.

Question 20

Do you agree that the waterfront areas identified in the existing Local Plan should still be considered for regeneration? Should any further areas be considered, or the site area amended in some way?

Question 21

What should the priorities be for re-developing these areas be?

Question 22

Are there any further opportunities that should be explored for regeneration in the wider urban area?

Design

Securing high quality design

The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning process should achieve. Good design, making better places for people to live and work is key to achieving sustainable development. National policy requires local plans to set out a clear design vision and clear design expectations for new development by preparing design codes (or guides).

The existing Local Plan provides general design principles expected from new residential developments based upon the Government's [National Design Guide](#). Whilst these policies currently provide the Council with a strong starting point to shape new development proposals, they are relatively high-level and do not reflect the individual character areas of the borough, nor do they provide graphical or detailed guidance for specific types of developments.

To complement the preparation of the new Local Plan the Council is also currently preparing a borough-wide design code which will provide this additional level of detail and guidance to improve the standard of design quality across the borough. There are mutual benefits in preparing the borough-wide design code in parallel with the new Local Plan, and there is an opportunity to nestle the requirements of the design code within the Local Plan, meaning that full planning weight can be given to them when deciding future planning applications.

Question 23

Should the Council consider incorporating the emerging 'borough-wide design code' into new Local Plan?

Density

Housing density is the number of homes built on a specific area of land (usually a number per hectare). The higher the density the less land is required to build on, however this is not always appropriate in every circumstance, and can result in poorly designed areas which do not reflect local character.

National policy requires local plans to set minimum density standards for town centres and other locations which are well served by public transport. In other areas a range of density standards can be considered to reflect the accessibility and potential of different areas.

The existing Local Plan follows the national policy approach, setting minimum densities of dwellings per hectares (dph) depending on the accessibility of specific locations. This ranges from at least 50 dph in the most accessible locations e.g., the town centres of Great Yarmouth and Gorleston, 30 dph in the main villages like Caister, Martham, Belton, to 20 dph in the smaller villages and rural areas of the borough.

Question 24

Should we continue to set minimum densities for new developments outside of our town centres? If so, what should it be?

Question 25

Does the current approach to calculating density i.e., dwellings per hectare remain appropriate, or should we consider alternative methods to calculate density e.g., habitable rooms per hectare?

Optional standards for accessibility, internal space and water efficiency

The new plan has the option to apply technical standards for new homes which go beyond Building Regulation requirements. These currently include standards set for accessible and adaptable dwellings (called “M4(2) standard”), wheelchair user dwellings (“M4(3)”) and enhanced water efficiency standards. The Government is seeking to update Building Regulations to require all new dwellings to be of M4(2) standard. The Government also has a nationally described internal space standard which local plans can also choose to adopt. In choosing to adopt any of the local optional technical standards, plans need to consider the need and viability of development to do so.

The existing Local Plan requires all new homes to meet M4(2) accessible and adaptable requirements, and as well as requiring homes to meet the higher water efficiency standard of 110 litres per person per day. The existing Local Plan does not require new dwellings to meet the nationally described space standard, nor meet M4(3) wheelchair user standards due to the present viability of doing so.

Question 26

Should the Council continue to require new housing developments to meet the higher water efficiency standard of 110 litres per person per day?

Question 27

Should the Council consider adopting additional optional standards in relation to M4(3) wheelchair users or the nationally described space standards?

Housing Planning Policies

Affordable Housing – Overall Provision

House prices in the borough are nearly 7 times average annual earnings which means that many people cannot afford to buy or rent their own home and rely upon affordable housing to meet their accommodation needs. Affordable housing can be provided in different forms to help suit individual circumstances. This includes affordable rented housing, such as council homes or those provided by a housing association, and affordable home ownership for those who wish to buy but cannot currently afford to.

Evidence from the Council's [Local Housing Needs Assessment](#) indicates that to meet future affordable housing need to 2041, the Local Plan will need to plan for at least 2,644 affordable homes, or 37% of the total amount of housing planned. Of the 2,644 affordable homes, 86% should be provided for affordable rent, and 14% should be provided as affordable homes to buy.

Question 28

Should the plan provide for the affordable housing need as a minimum?

Affordable Housing – Housing sub-market areas

In the existing Local Plan, the borough is divided up into three affordable housing sub-market areas reflecting the geographical differences in viability across the borough. Each sub-market area sets a development threshold of either 10 or 15 dwellings when triggering affordable housing contributions of either 10% or 20% of the total development.

The latest [needs assessment](#) indicates that four housing sub-market areas are now likely to be operating in the borough. These sub-areas are based on market characteristics rather than solely financial viability, however, remain broadly similar to those in the existing plan, although a new sub-market area is identified in the Gorleston/Bradwell area.

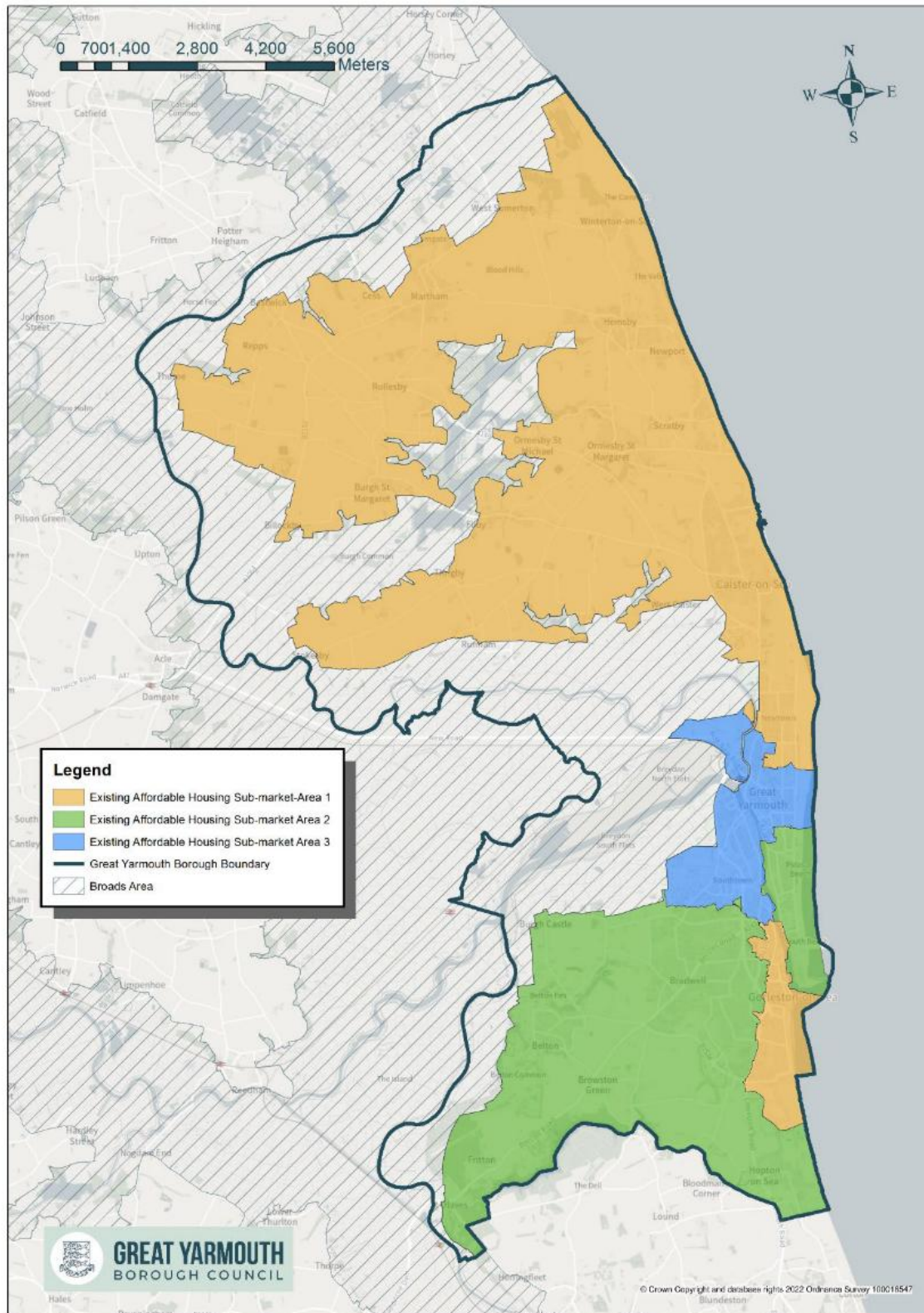


Figure 2 - Existing Affordable Housing Sub-Market Areas

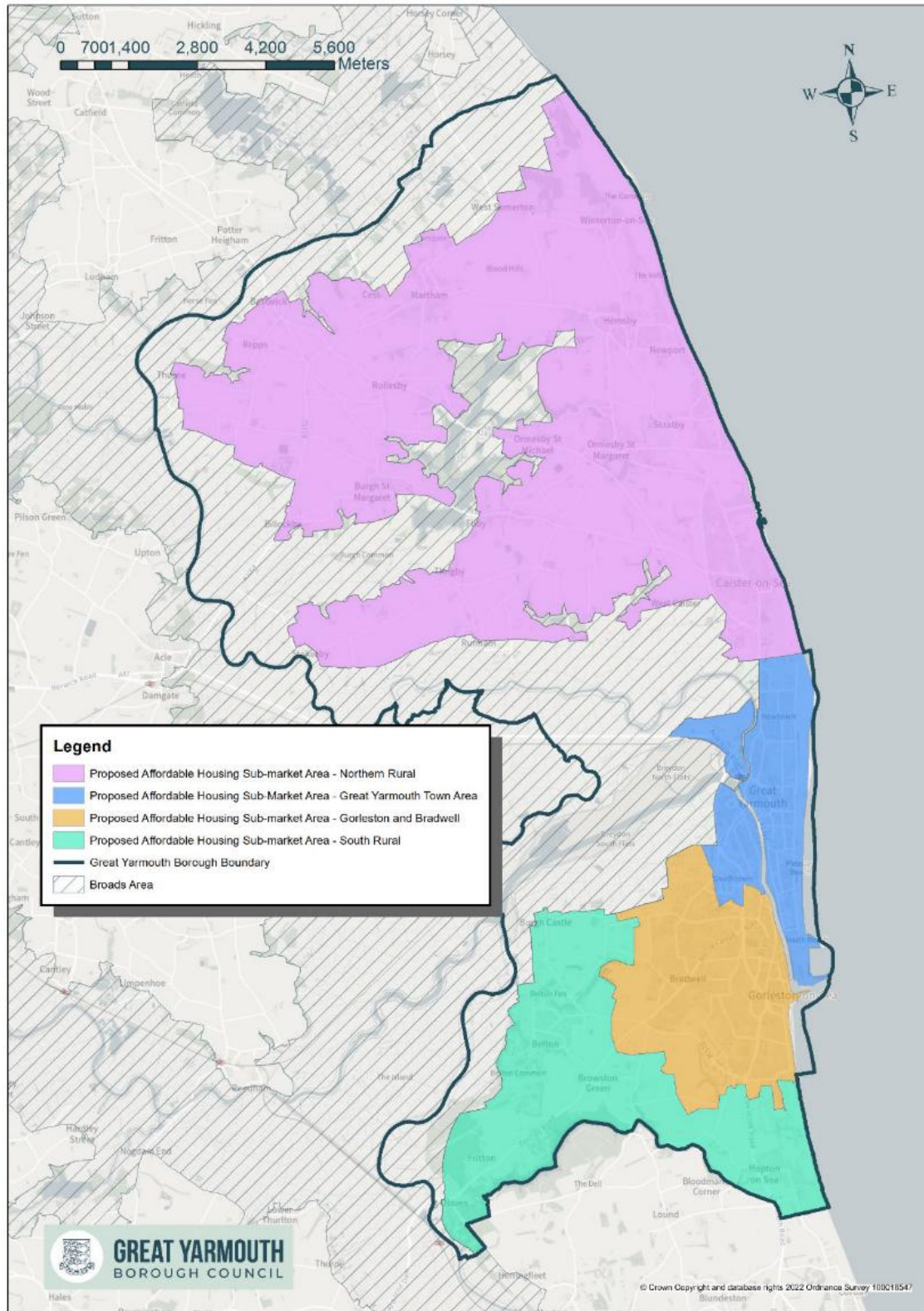


Figure 3- Proposed Sub-Market Areas in the Local Housing Needs Assessment 2022

Question 29

Should the plan continue to seek different levels of affordable housing on new housing developments, based upon their location in housing sub-market areas?

Question 30

Do you think the proposed housing sub-market areas in the Local Housing Needs Assessment 2022 best reflect the main differences in housing affordability and need across the borough?

Affordable Housing – First Homes

National policy generally expects at least 10% of all housing on development sites to be made available for affordable home ownership. There are a range of affordable homeownership products available to developers which meet the definition of affordable housing, including 'First Homes'.

First Homes are discounted by a minimum of 30% of market value (or a higher discount of either 40% or 50% where demonstrated through a local housing needs assessment). National policy expects that a minimum of 25% of all affordable units delivered on sites need to be First Homes, therefore First Homes can make up or contribute to the 10% affordable homeownership requirement noted above.

The Council's Local Housing Needs Assessment indicates that all the borough's affordable homeownership need (367 homes) could be provided through 'First Homes' if the Local Plan sets its local market value discount at 50%. If a lower discount was set at 30%, then only 1 in 5 properties provided as 'First Homes' would help to meet the borough's affordable homeownership need, and therefore additional affordable homeownership products would need to be sought on sites through the plan, to ensure needs are fully met.

Question 31

Do you agree that the Local Plan should set its 'First Homes' local market discount at 50%? If not, what discount should be applied and how can the plan ensure that all of affordable homeownership needs are met in full?

Affordable Housing – Exception Sites

Local plans have the ability to allow some forms of housing development to come forward outside of allocations or the development limits on 'exception sites' in order to help meet any identified affordable housing needs of local areas. National policy prescribes two forms of exception sites 'Rural' and 'First Homes' which local plans can set policies on.

The existing Local Plan allows for rural exception sites to be built within or close to any settlement where there is an identified local affordable housing need. Whilst the policy seeks to bring forward affordable housing, it also allows for a proportion of market housing to come forward on a site to help make them more viable and to encourage them to come forward for development.

Whilst 'First Homes' exception sites are principally similar to 'Rural' exception sites, they are aimed at delivering primarily First Homes on the site as the affordable housing and may also allow an element of market housing to help fund their delivery.

Question 32

Should we allow Rural or First Home exceptions sites to come forward anywhere, or only where they are located close to settlements with good accessibility to services?

Question 33

Should we continue to allow market housing to enable the delivery of Rural or First Home exception sites where the financial viability of a development is challenging? If so, should the plan set a maximum percentage of market housing on such sites?

Older People Housing

National policy requires local plans to provide for a range of housing types for older people where a need exists, as often their choices are limited by shortages of specialist housing provision within an area's existing housing stock. Increased choice to suit changing needs can help those to live independently for longer and reduce costs on the social and healthcare system. Extra accommodation can also help free-up some of an area's existing housing stock, making it available for families and other young people for whom it is more suited.

The borough's population is ageing, and the largest share of population growth predicted by 2041 is expected to occur across the borough's older residents (aged 65+), increasing by over 7,000 persons. To meet the needs of our increasing ageing population, the Norfolk 'Study of Retirement Housing Demand and Planning Issues' has indicated that an additional 1,348 specialist retirement housing units will need to be provided by 2041.

The study indicates that there is a combined need for an additional 710 beds in nursing and residential care homes. However, as people get older, the probability of needing to access these beds is decreasing and combined with the planned increase in provision of 'extra-care' dwellings, it may not be necessary to plan for any need above retaining the existing provision.

Question 34

Should the Council specify a proportion of retirement housing, or other forms of housing suitable for older people (such as accessible housing or bungalows) on sites over a certain size and/or location?

Question 35

Should the Council continue to safeguard the potential for new housing accommodation for older people to come forward on available sites (above other forms of residential accommodation) where located within the town centres of Great Yarmouth and Gorleston? Should other locations be included?

Question 36

Should the Council allocate specific sites in the Local Plan for housing accommodation for older people?

Self-build

Nearly half of the national population say that they would consider building their own homes, however less than a tenth of the total number of homes are self-built in the UK, compared with figures upwards of 70 or 80% elsewhere in Europe.

As a Council we are required to keep a register of people who are interested in self-build and custom housebuilding and ensure that enough plots are provided to meet that need. The current demand for self-build in our borough is quite low, therefore this need is regularly being met through the granting of planning permission on single plots on windfall sites, without any specific policy requirement in our

current Local Plan to either allocate sites or require a proportion of plots on larger sites to be made available for self-build.

Question 37

a) Should self-build plots be provided as part of housing developments?

b) Should the plan allocate specific sites for 100% self-build?

c) What other options could the Local plan consider for self-build provision?

Houses in Multiple Occupation

Houses in multiple occupation are properties being shared by three or more who form two or more separate households and who share a kitchen and bathroom (and/or toilet).

Houses in multiple occupation provide an important role in providing low-cost accommodation. However, due to changes in the holiday accommodation sector there has been an increase over recent years of properties converting to houses in multiple occupation, which has led to clustering and an over-concentration of these uses in certain parts of the urban area. In response the existing Local plan has a policy ([Policy H12](#)) to avoid the over concentration of houses in multiple occupation in any one area in order to avoid impacts on amenity. The policy also prohibits the development of such uses in the seafront area and the 'back of seafront' area.

Question 38

Should the Local Plan continue to have a policy restricting the over-concentration of houses in multiple occupation in any given area?

Employment, Retail and Tourism Planning Policies

Safeguarded Employment Areas

Previous local plans have sought to designate and protect land for employment use (office, industrial and warehousing uses) where there are clear identified needs. Such an approach ensures that there are sufficient premises available for employment uses and opportunities within the borough to develop employment uses. It also helps to avoid conflicts of uses that may not be appropriate within predominantly employment areas.

The Employment Land Needs Assessment 2022 has audited existing sites and provided recommendations as to which of the previously safeguarded sites, and any new sites, are worthy of protection. Part of the South Denes and Beacon Business Park sites also benefit from 'Enterprise Zone' status and Local Development Orders to stimulate growth as a Centre for Offshore Renewable Energy.

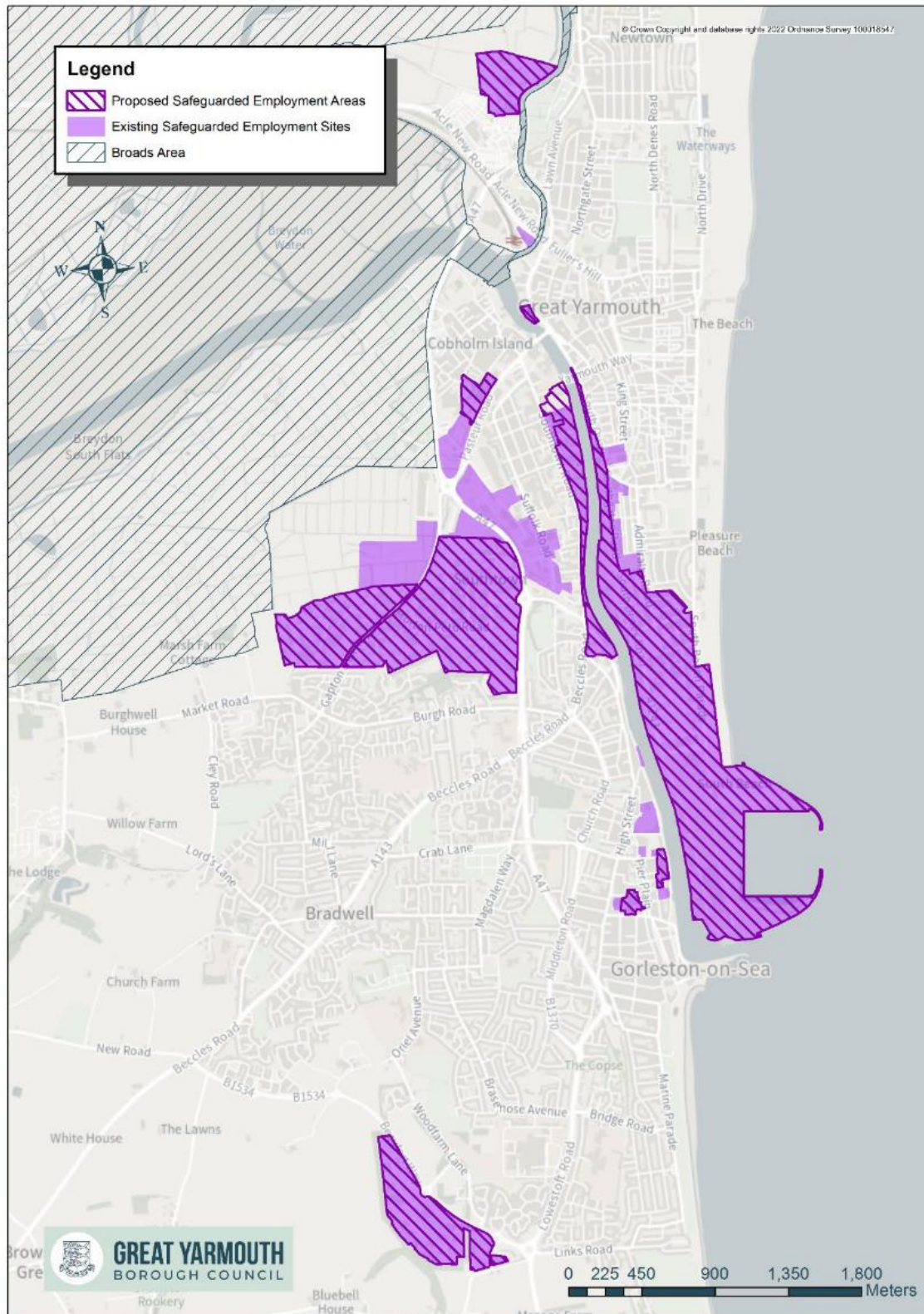


Figure 4 - Safeguarded Employment Sites - Existing and as proposed by the Employment Land Needs Assessment 2022 - Great Yarmouth and Gorleston

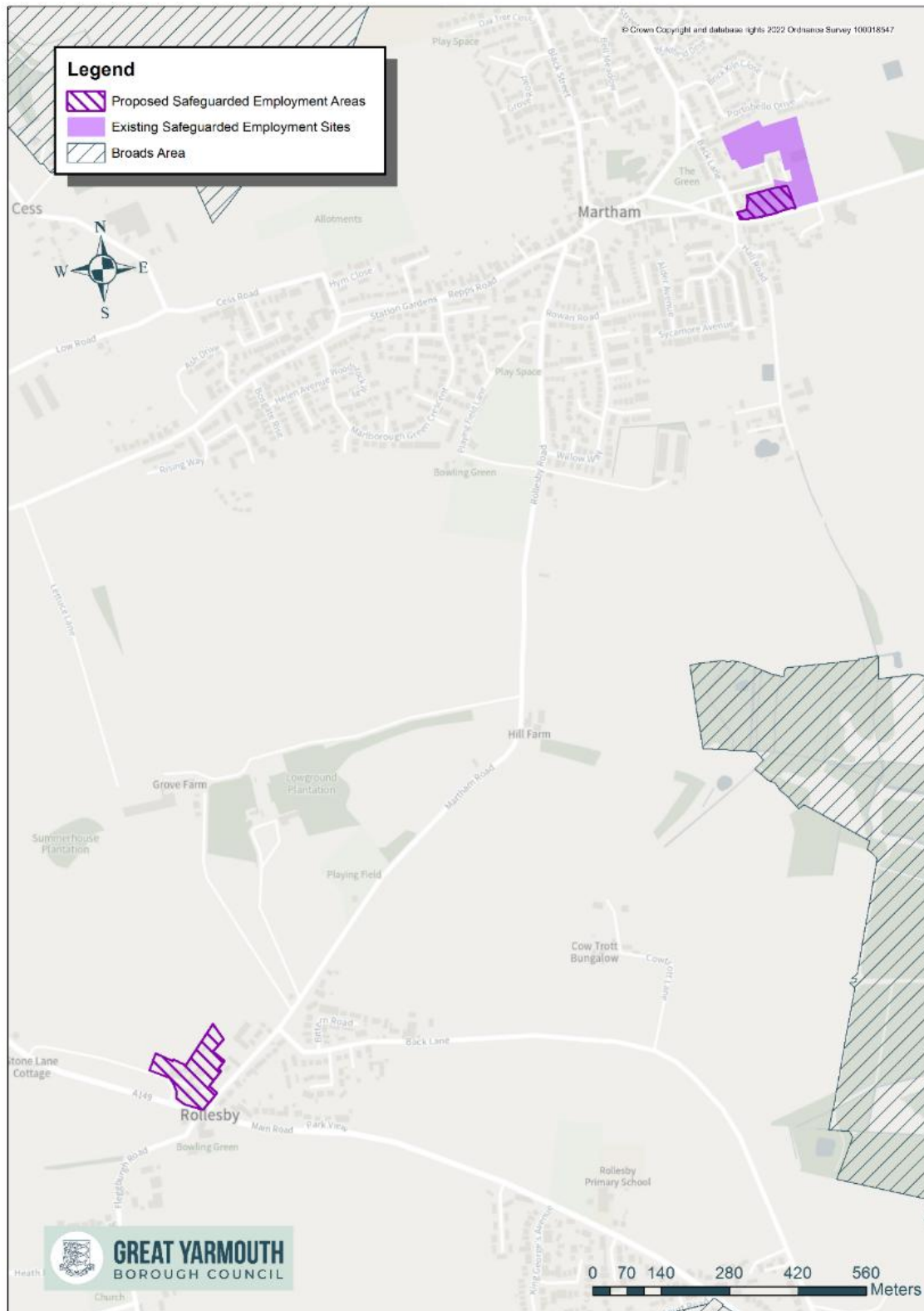


Figure 5 - Safeguarded Employment Sites - Existing and as proposed by the Employment Land Needs Assessment 2022 – Martham and Rollesby

Previous local plans have supported employment development within existing built-up areas (Development Limits) where they do not give rise to unacceptable impacts on neighbouring occupiers. Previous policies also tended to have a more restrictive approach to rural employment activities, such as further justification as to why a rural location is necessary and whether there are any suitable sites available in existing built-up areas.

Question 39

a) Should the Local Plan identify ‘Safeguarded Employment Areas’ to protect premises and land for employment uses within the area from redevelopment/conversion to other uses unless marketing evidence demonstrates that there is no demand for employment use?

b) If so, do you agree with the areas identified?

c) Should any flexibility be provided on the variety of uses allowed within ‘Safeguarded Employment Areas’, such as car showrooms, and trade counters?

d) Should the Local Plan provide greater protection to more strategic sites such South Denes and Beacon Business Park which have been specifically identified to support growth in the offshore energy sector?

Question 40

Should the Council continue to support development of employment uses within existing built-up areas, with a more restrictive approach for proposals within the open countryside?

Town Centre Uses

[National planning policy](#) is clear in identifying that the town centre (and other smaller centres, as appropriate), is the place to locate retail, offices, leisure and cultural uses at the heart of the communities that they serve. Development of these uses is only considered suitable outside of town centres when there is no land available within them. It is therefore important that such centres are identified on the Policies Map.

It is important that centres are resilient and adaptive. Plans and policies must seek to protect the vitality and viability of centres. National planning policy also recognises that residential development can play an important role in maintaining the vitality of centres.

Great Yarmouth Town Centre is the borough’s largest centre reflected in size and the variety of services and facilities. Gorleston Town Centre is also a large centre offering a decent range of services and facilities. Beyond these areas, there are other smaller high streets, village centres and shopping parades which serve smaller communities; some of which have benefitted from ‘District Centre’ or ‘Local Centre’ designation.

The borough has rates of childhood and adult obesity which significantly exceed regional and national averages. Public Health England have issued guidance, [‘Using the planning system to promote healthy weight environments’ \(2020\) \(addendum in 2021\)](#) encouraging the consideration of restrictions on hot-food take-aways as a way of encouraging more healthy eating. Options could involve restricting new developments in wards with the highest rates of obesity, restricting development close to schools or restricting clustering of uses within town centres, district and local centres.

Question 41

What should the priorities for the Great Yarmouth Town Centre Area be?

Question 42

What should the priorities for the Gorleston Town Centre Area be?

Question 43

a) Should the Local Plan continue to identify and protect District Centres and Local Centres?

b) Are there any shopping areas we have missed which you think should be designated as a local centre or district centre?

c) What should the priorities for those areas be?

Question 44

Should the Borough Council apply a more restrictive approach to permitting hot food takeaways? If so, how?

Tourism

The tourist economy remains an integral part of the borough's wider economy and cultural heritage. It is therefore important that accommodation and facilities are protected where desirable, and that opportunities to enhance the visitor experience are taken through new development. One way to support this is to identify the main tourist areas for attractions and accommodation. Generally, there is a need to support the enhancement of the borough's accommodation stock. The existing Local Plan identifies 'Holiday Accommodation Areas' to protect and enhance these tourist facilities. The existing Local Plan also protects holiday accommodation across the borough, including the seafront area of Great Yarmouth.

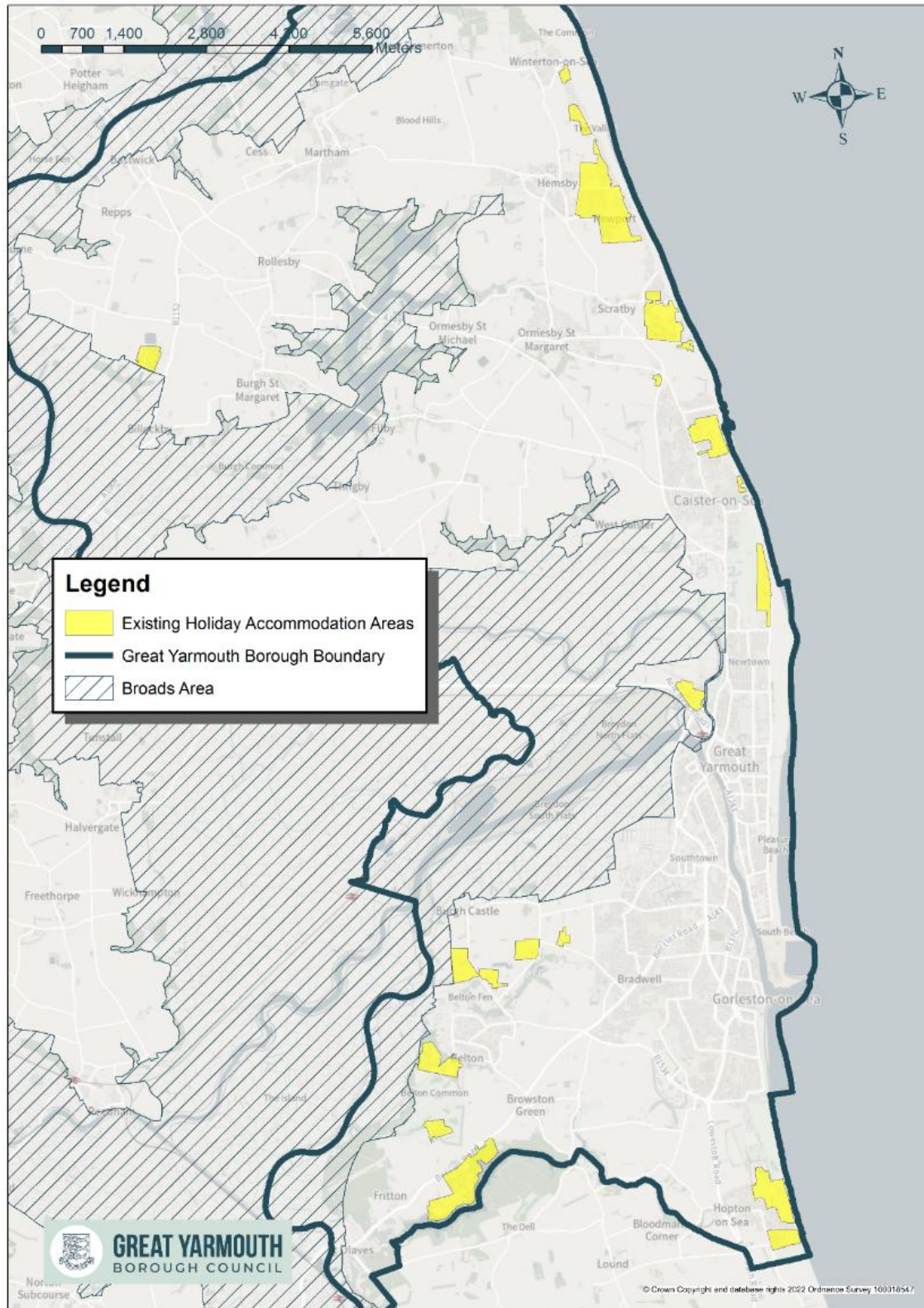


Figure 6- Existing Holiday Accommodation Areas

Over the last 10 years there have been multiple planning applications for expanded tourist accommodation. Rural locations tend to lack services and facilities (other than those contained within the holiday camp) and access to public transport, and as such they have a much lower capacity to support development. There is also a risk that some accommodation is (or may be) unlawfully used for permanent residency.

Question 45

Do you agree with the extent of the existing 'Holiday Accommodation Areas' identified?

Question 46

Should tourism developments including holiday accommodation be supported outside of built-up areas and identified 'Holiday Accommodation Areas'?

Great Yarmouth Seafront

Great Yarmouth Seafront remains a vibrant, family-friendly coastal resort that offers visitors a wide choice of shops, restaurants and bars. The greatest concentration of attractions within the borough lays along the 'Golden Mile' at the seafront with key attractions such as the Wellington and Britannia Piers, the Sea Life Centre, the new Marina Centre and the Pleasure Beach. The area is steeped in history with multiple buildings and structures of historic significance.

The area is also a key corridor of movement, providing facilities to support walking, cycling, hire scooters, horse and cart trips, sight-seeing trains, public transport, and private vehicles. It is therefore important that all proposals ensure the safe and convenient movement of residents and visitors.

Beyond the immediate seafront, moving west inland, there is a large area comprising large terraces that traditionally served as the main holiday lets, bed & breakfast, visitor accommodation. Such buildings have a distinct historic character, however, over the last 20 years there has been a transition to other uses, predominantly permanent residential accommodation, but also including Houses in Multiple Occupancy. While there is undoubtedly an important role for this accommodation to play in providing lower-cost accommodation, they can sometimes have amenity impacts both on their residents and on adjoining residents. Previous local plans have sought to prevent HMO use in the Great Yarmouth Seafront and back of seafront areas.

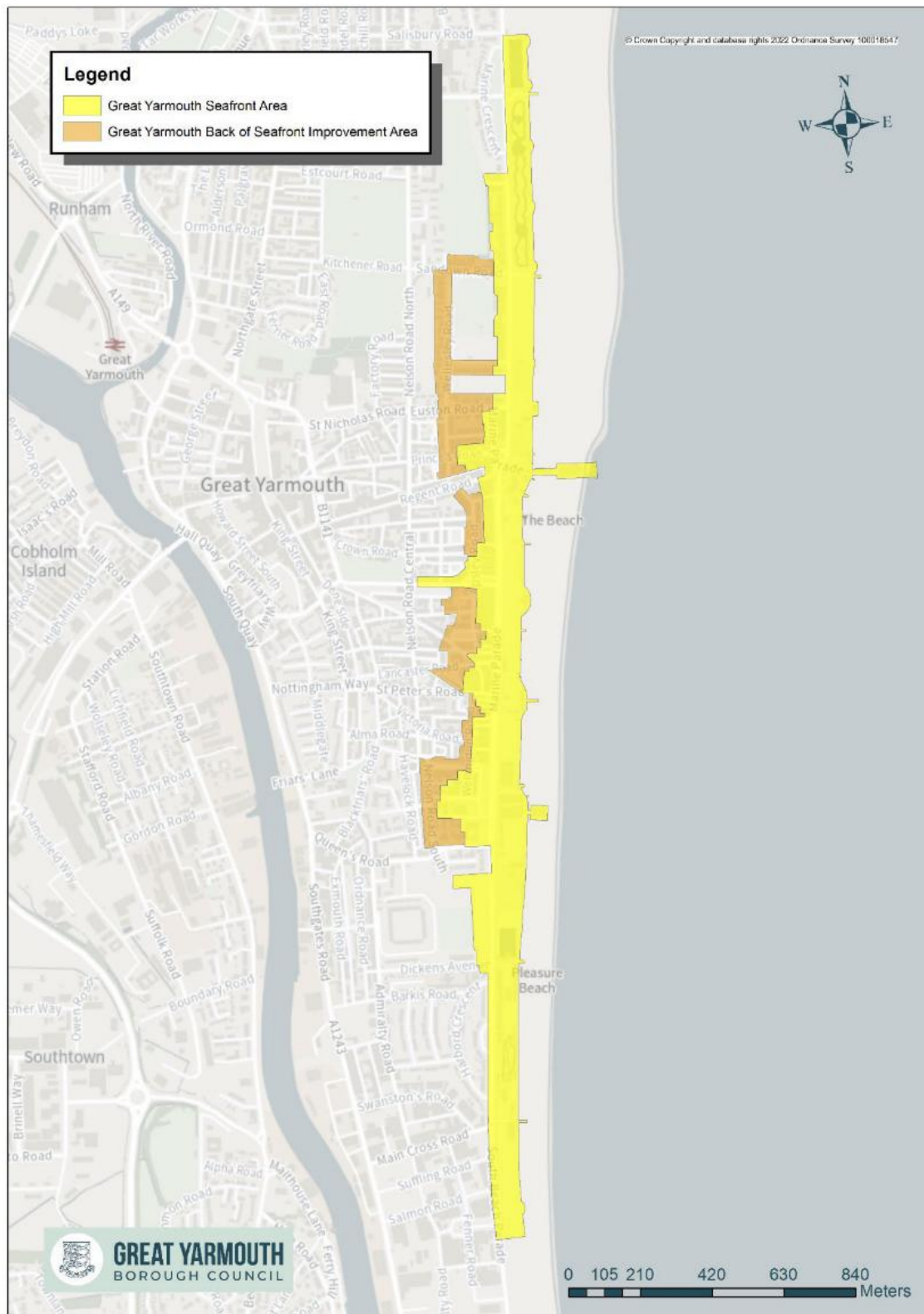


Figure 7- Great Yarmouth Seafront area and 'Back of Seafront' area as identified in the existing Local Plan

Question 47

What uses/development should be encouraged within the Great Yarmouth Seafront area?

Question 48

Are there any uses/development which should be restricted within the Great Yarmouth Seafront area?

Question 49

Is there anything else that should be prioritised within the Great Yarmouth Seafront area?

Question 50

What uses should be supported or restricted in the area to the back of the seafront?

Gorleston Seafront

There is an opportunity for the Local Plan to build on the ambitions set out in the Gorleston Seafront Masterplan. The masterplan objectives seek to improve within the area:

- Conservation
- Wayfinding & local enhancements
- Sustainable transport & parking
- Accessibility
- Leisure attractions
- Environmental standards
- Events

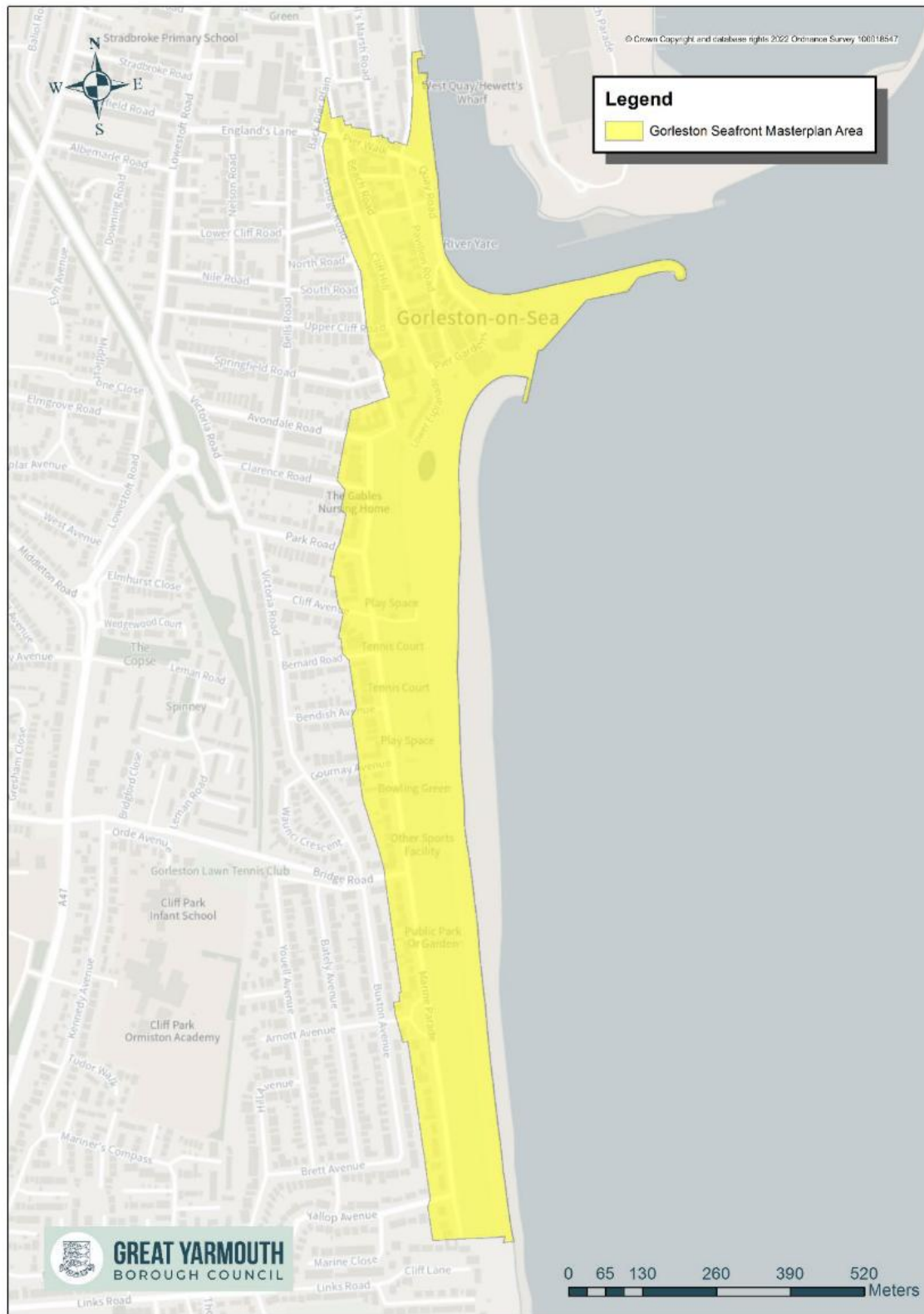


Figure 8 - Gorleston seafront area as identified in the Gorleston-on-Sea Masterplan

Question 51

Should the plan include a policy to support development to achieve the above objectives for Gorleston seafront? Is there anything else that such a policy should include?

Open Space, Community Services and Facilities Planning Policies

Open Spaces

[National planning policy](#) identifies that access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change. National planning policy seeks to protect existing open spaces unless:

- the space is demonstrably surplus to requirements; or
- the loss will be replaced in quantity and quality; or
- the alternative open space provision benefits outweigh the loss.

In addition to open space protection, national planning policy allows communities to designate 'Local Green Spaces' through local plans and [neighbourhood plans](#). For those parishes with adopted neighbourhood plans, communities have already identified their own Local Green Spaces, therefore there is no need to identify any further spaces within these areas. Under national policy, such spaces will have protection consistent with [Green Belt](#) and will only be designated where the green space is:

- in reasonably close proximity to the community it serves,
- demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- local in character and is not an extensive tract of land.

The Borough Council has reviewed the Local Green Spaces suggested through the 'call for sites' using the above criteria. This has identified some sites that may warrant Local Green Space designation.

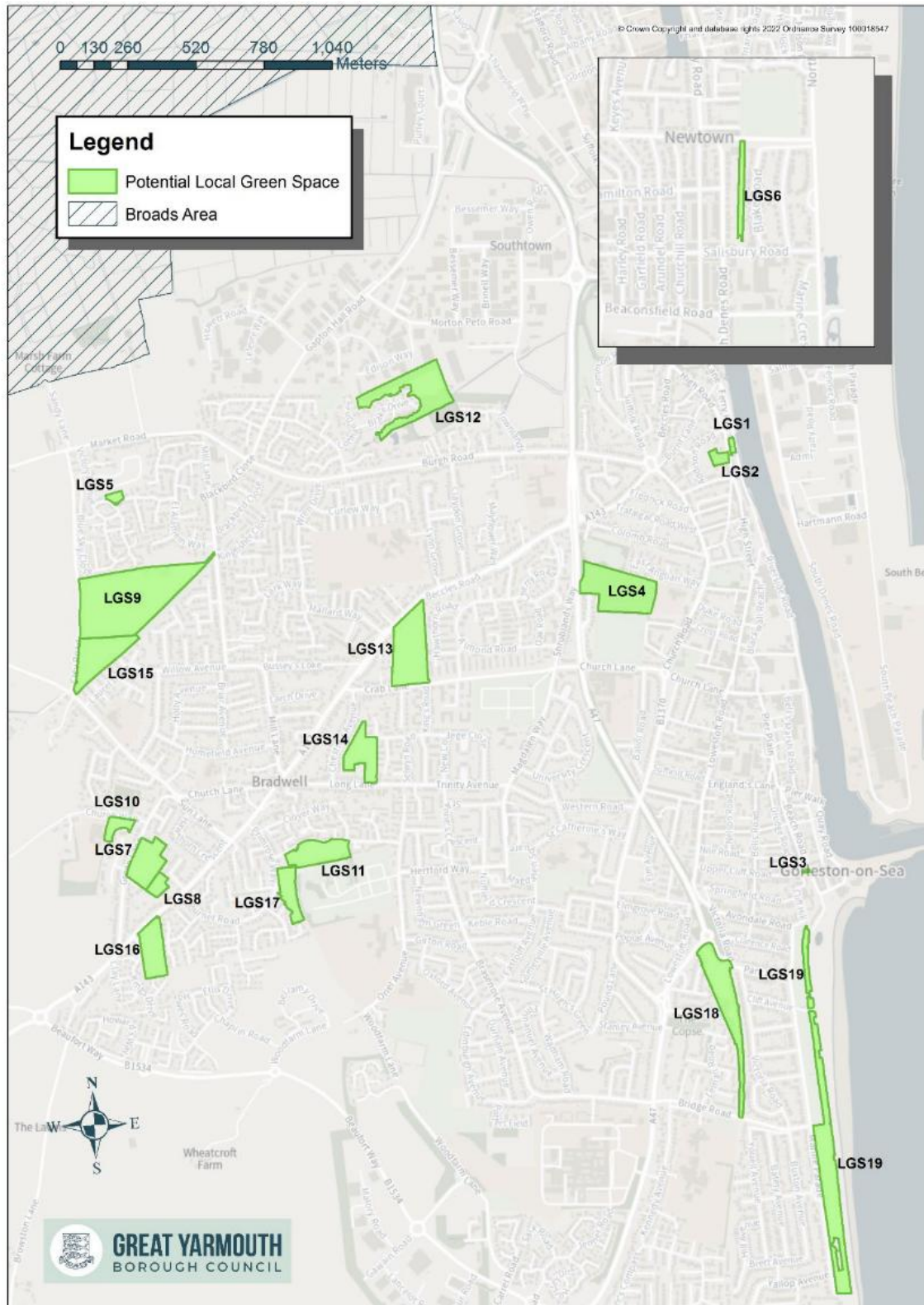


Figure 9- Potential Local Green Spaces

Question 52

Should the Local Plan have a specific policy to protect its open spaces, or rely on national planning policy to do so?

Question 53

a) Should the Local Plan identify Local Green Spaces?

b) Do you agree or disagree with any of the spaces identified?

Community Facilities

Community facilities are a type of infrastructure essential in maintaining sustainable communities. They can be wide-ranging, including facilities such as schools, colleges and other educational facilities and community centres, doctors, dental surgeries, public houses, local shops, cultural buildings, and sport and recreational facilities. In smaller settlements, facilities can be limited to just a public house or post office/convenience store; nonetheless, such facilities hold value to the communities that they serve.

[National planning policy](#) is clear that policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.

Previous local plans have sought to protect such facilities by permitting their loss only where criteria are met such as marketing evidence demonstrating that the use is no longer viable.

The [Community Right to Bid](#) as introduced by the Localism Act, offer communities the opportunity to identify community facilities as Assets of Community Value. Where an asset is listed, community groups get a chance to prepare a business case and put in an offer to buy the asset when it comes up for sale. The Local plan could give increased protection to Assets of Community Value to give communities a greater chance of securing the asset.

Question 54

Should the local plan continue to protect all existing community facilities as far as it is possible to do so?

Question 55

Where it is not possible or viable to retain an existing community facility, should policy require further consideration of how the community may be served (alternatives) before allowing its loss?

Question 56

Should certain community facilities be afforded more protection than others, for example those listed as an Asset of Community Value?

Climate Change Planning Policies

Local plans have an important role in helping to reducing greenhouse gas emissions and ensuring development adapts to the impacts of climate change. This can be through locating development in accessible locations which minimises the need for the use of the private car, supporting renewable energy developments and ensuring new development is safe from flooding and coastal erosion.

The Council's Sustainability Strategy (2022) sets out a strategy for how the Council will work with stakeholders to reduce greenhouse gas emissions. The strategy sets a target for Council operations and estates to be net zero by 2035. The strategy sets an action for the Local Plan review to encourage low carbon development.

Renewable and Low Carbon Energy

[National planning policy](#) requires that local plans include a positive strategy for the development of renewable and low carbon energy infrastructure. National policy also requests local planning authorities to consider identifying suitable areas for renewable energy development. It states that developments for new wind turbines should only be permitted where suitable areas have been identified and local concerns resolved. A key issue for renewable energy development in Great Yarmouth is the proximity to the Broads and the Norfolk Coast Area of Outstanding Natural Beauty and the potential for such development to impact upon the setting of these protected landscapes. The Broads Landscape Sensitivity Study for Renewable and Infrastructure 2012 ([Part 1](#)) ([Part 2](#)) identifies that wind turbines in most parts of the borough, particularly those higher than 50m in height, would have a visual impact upon the Broads.

As part of the call for sites the Council invited submissions for renewable energy development, 3 sites were submitted, and we would welcome your view on them.

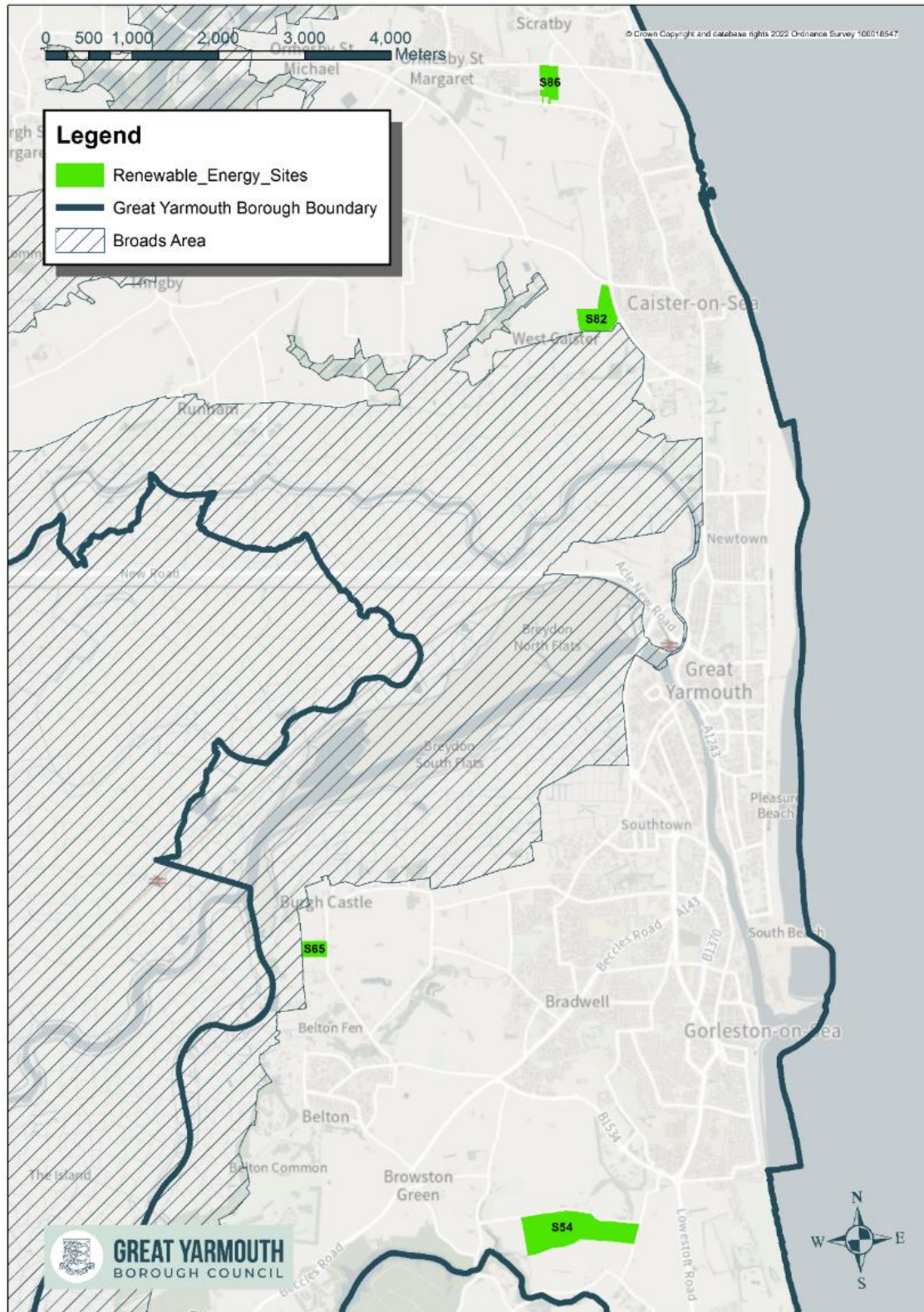


Figure 10- Sites Submitted during 'Call for Sites' for consideration for Renewable Energy Development

Question 57

a) Should the Local Plan identify suitable areas for renewable energy development?

b) Are there any areas of the borough which you think would be suitable for renewable energy development such as those submitted through the call for sites?

c) if the Local Plan does not identify suitable area, what sort of positive strategy towards renewable energy development should it contain?

Sustainable Construction

[National planning policy](#) does not allow local plans to set energy efficiency standards for new homes which go beyond standards set out in the [Building Regulations](#). However, the Council can set higher standards for non-domestic buildings. However, energy efficiency standards are likely to increase the cost of construction which could make non-residential development less financially viable to develop.

There are other ways in which planning policies can help achieve energy efficiency and carbon reductions without setting standards for buildings such as through setting design requirements for the orientation of buildings and tree planting.

Question 58

How can the local plan encourage more sustainable buildings which reduce carbon emissions?

Question 59

Should the local plan include energy efficiency standards for non-residential development?

Flood Risk

Large parts of Great Yarmouth are at a high risk from flooding, mainly from the sea. Areas of the waterfront in Gorleston are also at risk. These areas benefit from flood defences which will protect against most flood events. However, in extreme events there is a risk of overtopping and breaches. Elsewhere in the borough there are parts of Belton, Bradwell, Burgh Castle, Caister, Hemsby and Winterton which suffer from flood risk from the sea, rivers and surface water.

[National planning policy](#) contains comprehensive policy on managing flood risk and there is no need for the Local plan to repeat this.

However, national planning policy requires development to be steered away from areas at risk from flooding. However, this is not practical in Great Yarmouth given the majority of town is at risk from flooding. There are sustainability benefits of allowing development in the town despite the risk of flooding. There may also be other parts of the borough where there are sustainability benefits which outweigh the risk of flooding, for example the re-use of brownfield land along the waterfront in Gorleston. National planning policy and existing local planning policy still requires development to be made safe from flooding for example through raised floor levels and evacuation plans.

Question 60

Are there any parts of the borough where a more flexible approach is needed to allow development in flood zones which have wider sustainability benefits?

Question 61

Are there any other local policy considerations which are needed in relation to flood risk?

Coastal Change

Some parts of the borough are at risk from coastal erosion with significant numbers of properties at risk within the next 100 years. The existing Local Plan has robust policies in place ([Policy GSP4](#) and [Policy E2](#)) to manage development within the area at risk and to allow development to relocate in line with national planning policy and these could be carried forward into the new Local Plan. In terms of relocation there is an opportunity for the Local Plan to specifically identify sites for relocation or require allocations for housing development to include plots for relocation

Question 62

a) Should the Local Plan allocate a site for the relocation of properties at risk from erosion?

b) Should any housing allocations in areas at risk, such as Hemsby and Scratby include a requirement for a certain number of plots to be made available for relocation?

Question 63

Do you have any other thoughts on possible planning policies for managing risk to coastal change?

Natural Environment Planning Policies

Biodiversity

The borough has a natural environment that is rich in biodiversity and includes internationally recognised nature designations such as SSSIs, SPAs (including Marine), SACs and Ramsar sites. These designations provide increased protection to a variety of wild animals, plants and habitats and are a vital part of global efforts to conserve the world's biodiversity.

[National planning policy](#) sets out a comprehensive suite of policies for protecting habitats and the Local Plan does not need repeat these. However, the national policy does require local plans to map and safeguard local wildlife -rich habitats and locally designated sites of importance for biodiversity as well as the ecological networks connecting them. In Great Yarmouth these will constitute County Wildlife Sites as identified by Norfolk County Council. Ecological networks have been identified in the [Landscape Character Assessment](#).

New development can potentially impact upon internationally protected habitats, principally through disturbance from recreational activities. To manage this, the Council working with other local planning authorities in Norfolk, has prepared a strategy to mitigate this impact known as the Norfolk Green Infrastructure and Recreational Avoidance Mitigation Strategy. It is likely that this strategy will be needed to support growth set out in the new Local Plan.

The Environment Act 2021 introduces a statutory requirement for 10% biodiversity net gain from most types of new development. In most cases this requirement will be met on site. However, in some case it will only be possible to deliver off-site net gain. The new Local Plan could identify specific sites or areas where off-site net gain could be directed to.

Question 64

a) Should the Local Plan identify specific sites for biodiversity net gain?

b) If so, are you aware of any sites which may be suitable?

Question 65

Do you have any other thoughts on possible local planning policies for biodiversity?

Landscape

The borough of Great Yarmouth has a diverse landscape character containing part so the Broads and the Norfolk Coast Area of Outstanding Natural Beauty.

The https://www.great-yarmouth.gov.uk/media/1236/Landscape-Character-Assessment/pdf/Landscape_Character_Assessment.pdf?m=635720551564970000 identifies a range of different landscape characters across the borough with recommendations on how the landscapes should be managed with respect to development. Existing local planning policy requires developments to have regard to the findings of the assessment.

The existing Local Plan also identifies '[strategic gaps](#)' between settlements where there is a risk of coalescence and loss of the individual character of settlements and their landscape setting. Such gaps include between Great Yarmouth and Caister, Caister and Ormesby, Belton and Bradwell, Hopton and Gorleston and Corton (in East Suffolk) and Hopton.

The Broads Authority have identified some of the darkest areas of the Broads within the borough of Great Yarmouth, particularly to the north of the borough near Somerton (see [Broads Dark Sky Surveys \(2015-2016\)](#)). The [Broads Local Plan](#) has a policy restricting illumination in these locations. The Great Yarmouth Local Plan could consider a similar policy for areas adjacent to these areas.

Question 66

Are there any particular landscapes outside of the Broads and the Area of Outstanding Natural Beauty which should receive specific protection in the Local Plan?

Question 67

a) Should the Council continue to identify and protect strategic gaps between settlements?

b) Are there any gaps missing from the existing plan which should be protected?

Question 68

Should the Council protect areas of dark skies adjacent to protected areas within the Broads?

Historic Environment Planning Policies

[National planning policy](#) provides detail on how both designated heritage assets, such as listed buildings, and non-designated heritage assets can be protected and enhanced. There is no need for the new Local Plan to repeat this. However, national policy requires local plans to set out a positive strategy for the protection and enhancement of the historic environment.

Question 69

What could be included in a positive strategy in the local plan to protect and enhance heritage assets? How could such a strategy support and influence Neighbourhood Plans?

Heritage assets

The borough has a rich and varied historic environment including 431 listed buildings, 14 scheduled monuments and 18 conservation areas. These heritage assets make an important contribution to the borough's culture, character, and distinctiveness; however, some heritage assets are in a poor condition and require active intervention to prevent them falling into disrepair. The current Local Plan promotes heritage-led regeneration, recognising its role in helping to create popular successful places with character, and as a valuable catalyst for regeneration. In recent years, the Council has collaborated with the Great Yarmouth Preservation Trust, Historic England, and the National Trust on a variety of heritage regeneration initiatives, for example, establishing the Great Yarmouth High Street Heritage Action Zone (HAZ) and continued repair and refurbishment of buildings along King Street.

Question 70

How might the Local Plan continue to prioritise heritage-led regeneration across the borough? Are there any specific areas in the borough where further active intervention may be necessary, and why?

Non-designated heritage assets

Non-designated heritage assets are not part of the national list of historically or architecturally significant buildings, however they can be of local interest and worthy of preservation. As these assets are not protected in the same way as, for example, nationally listed buildings or scheduled ancient monument, they can be prone to unnecessary loss.

The current Local Plan provides some resistance to the potential loss of non-designated heritage assets. Demolition is only permitted in limited circumstances, for example where the building is structurally unsound and beyond feasible repair, or where it has been demonstrated that all practicable alternative uses to sustain the building has been explored.

Councils can identify specific, non-designated heritage assets within their local plans through a policy mechanism called 'local listing'. The inclusion of a building or structure on a Council's 'local list' can be a planning consideration when determining planning applications and can also help to support the identification of buildings and structure of local importance in Neighbourhood Plans.

Question 71

What level of protection should be given to non-designated heritage assets?

Question 72

Should the Local Plan seek to identify non-designated heritage assets through a 'local list'? If so, what local criteria might be used to help identify specific, non-designated heritage assets?

Anything Else?

This consultation has sought to get views on some of the key local issues and considerations which the new Local plan will need to address. There will likely be other issues and planning policies which the Local Plan will need to include which are not covered by the above questions.

The existing Local Plan has policies on amenity, rural worker dwellings, conversion of rural buildings, replacement dwellings, extensions, annexes, kiosks and stalls, rural retailing, equestrian development, pollution and hazards, telecommunications, parking standards and foul drainage which haven't been specifically covered above. It is likely that the new Local Plan will retain some of these policies however, this will depend on proposed reforms to the planning system which include the creation of new national development management policies which local plans are not expected to replicate.

Question 73

Should the above listed policies be retained in the new Local Plan?

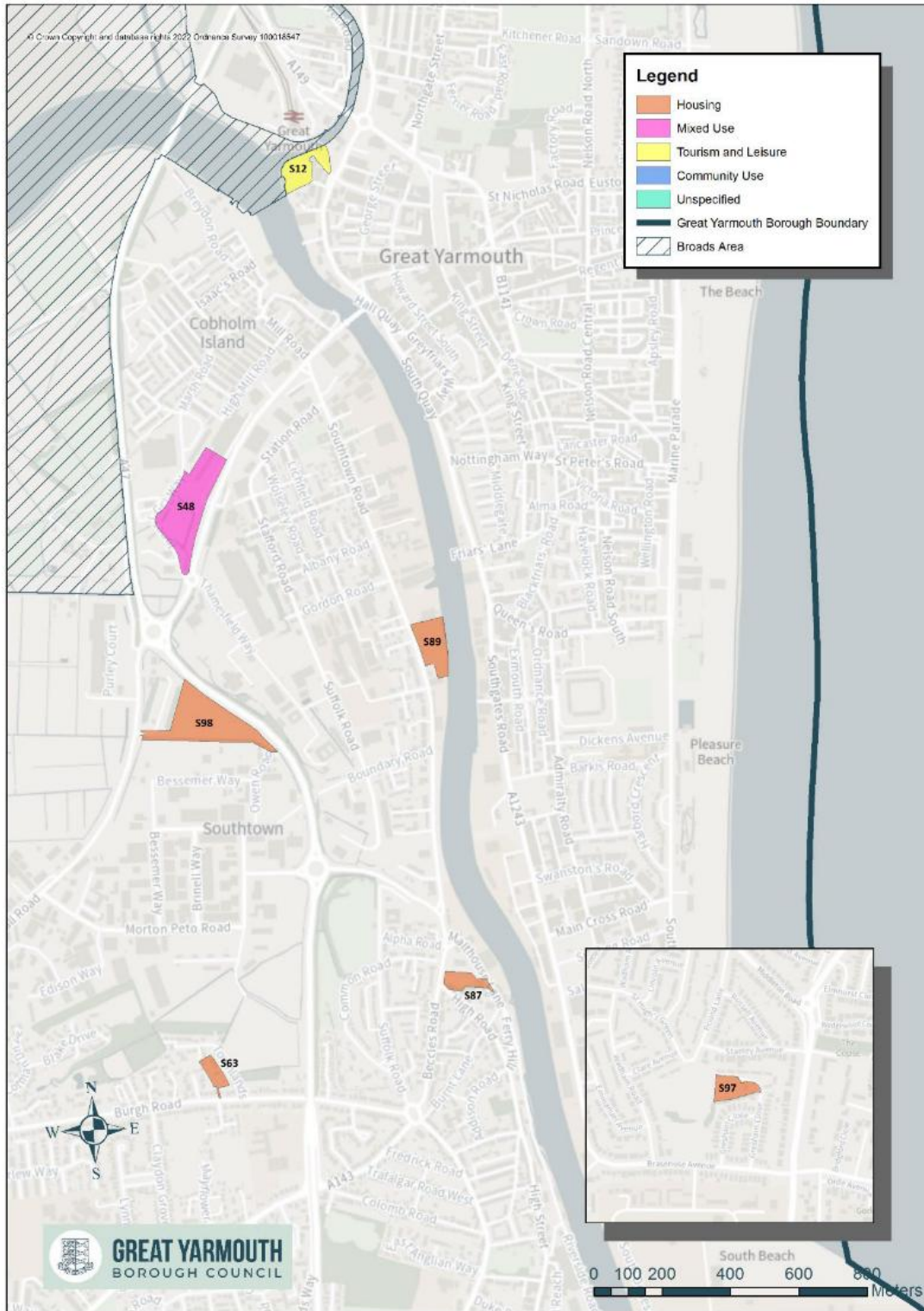
Question 74

Is there anything else the Local Plan should contain which has not been covered by the questions above?

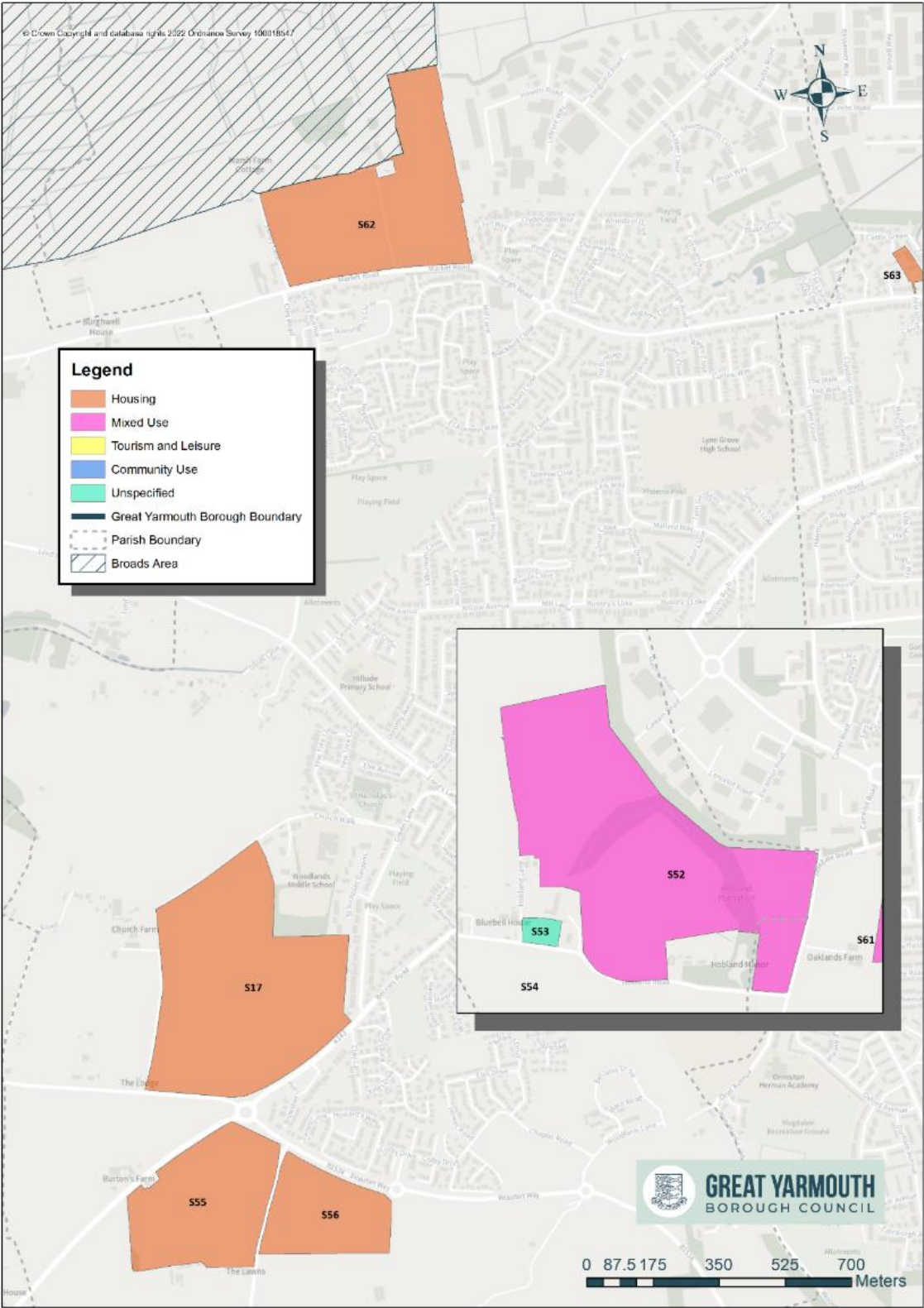
Appendix 1 – Maps of Potential Sites for Development

Great Yarmouth, Gorleston and Bradwell

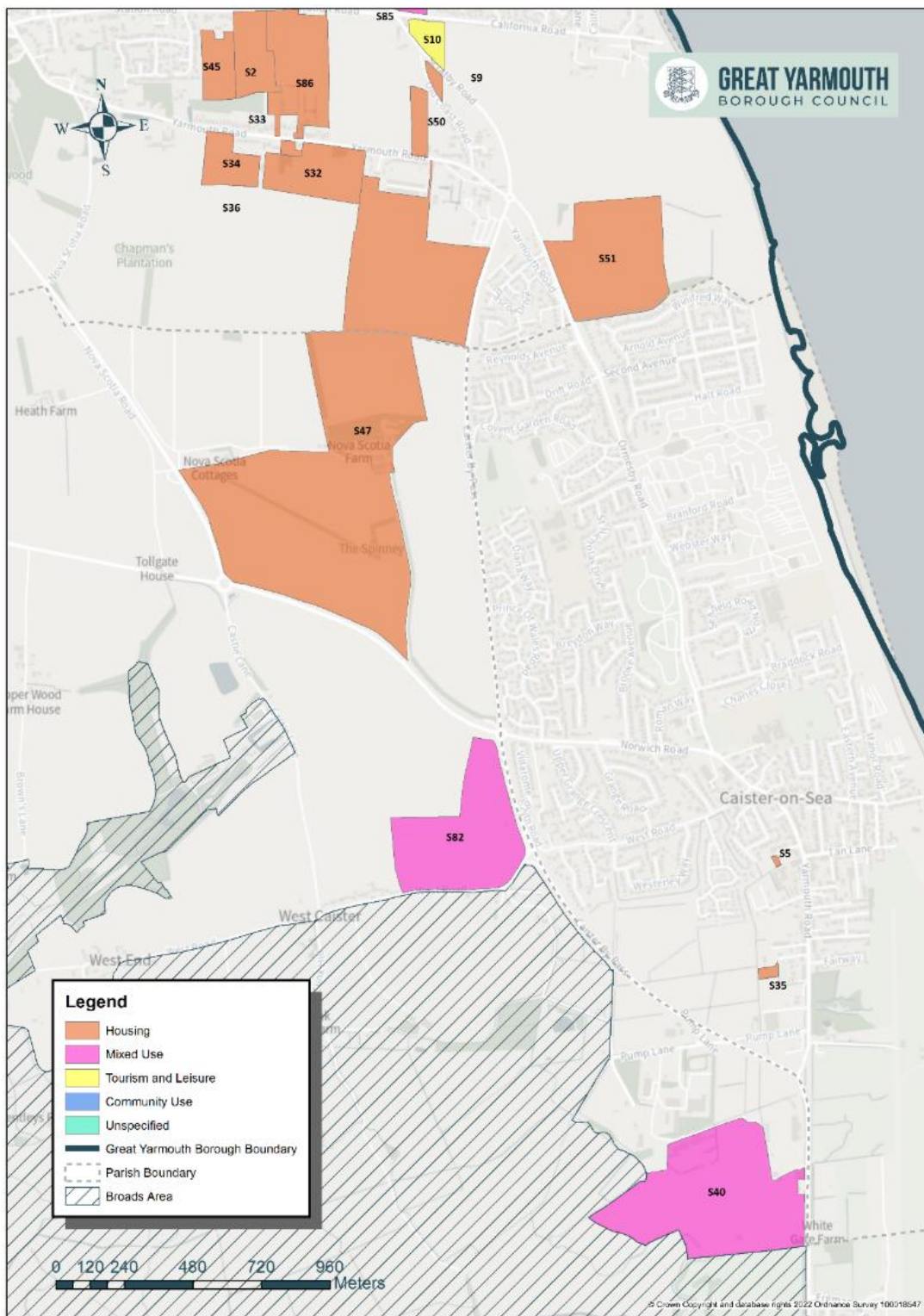
Great Yarmouth and Gorleston



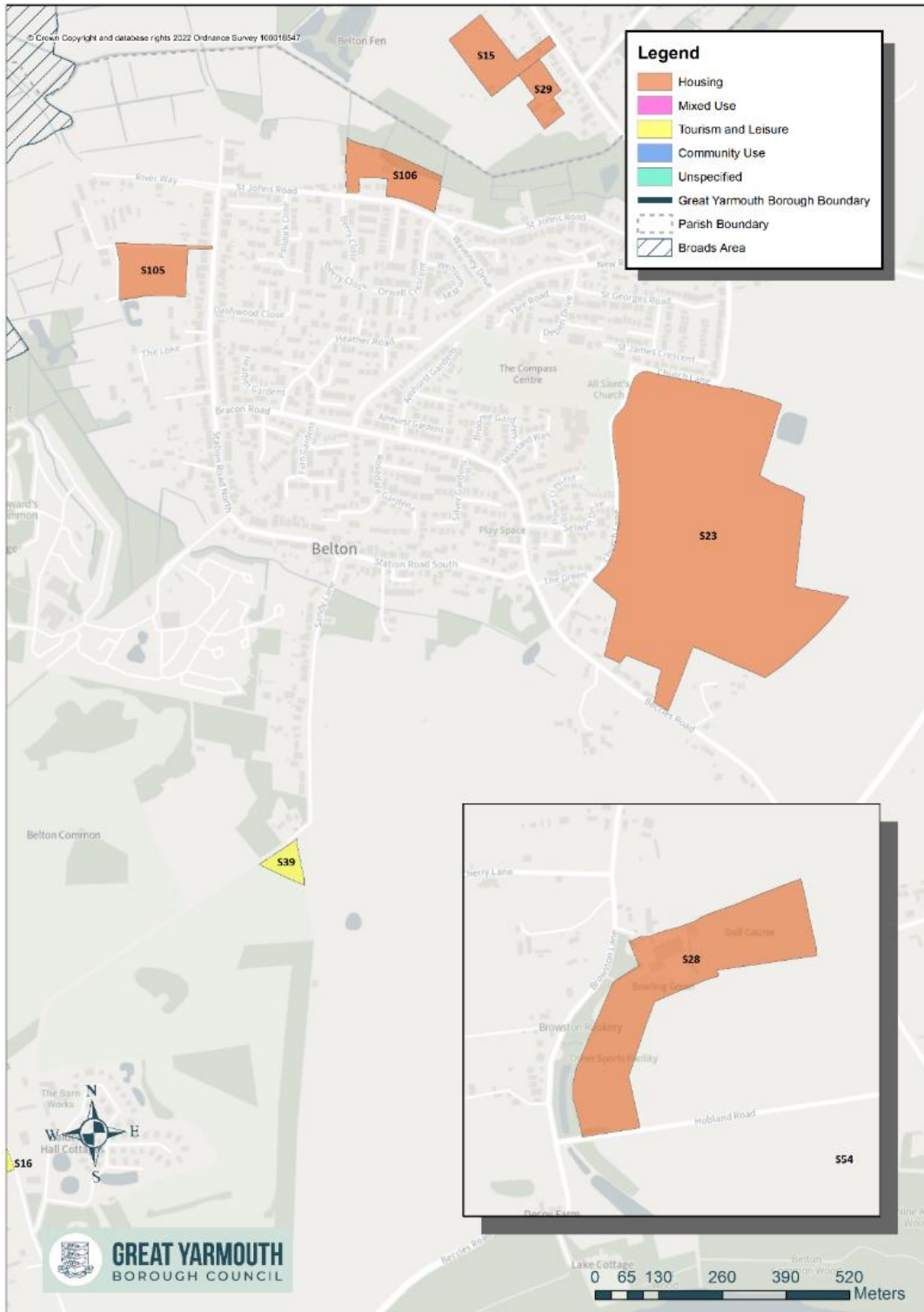
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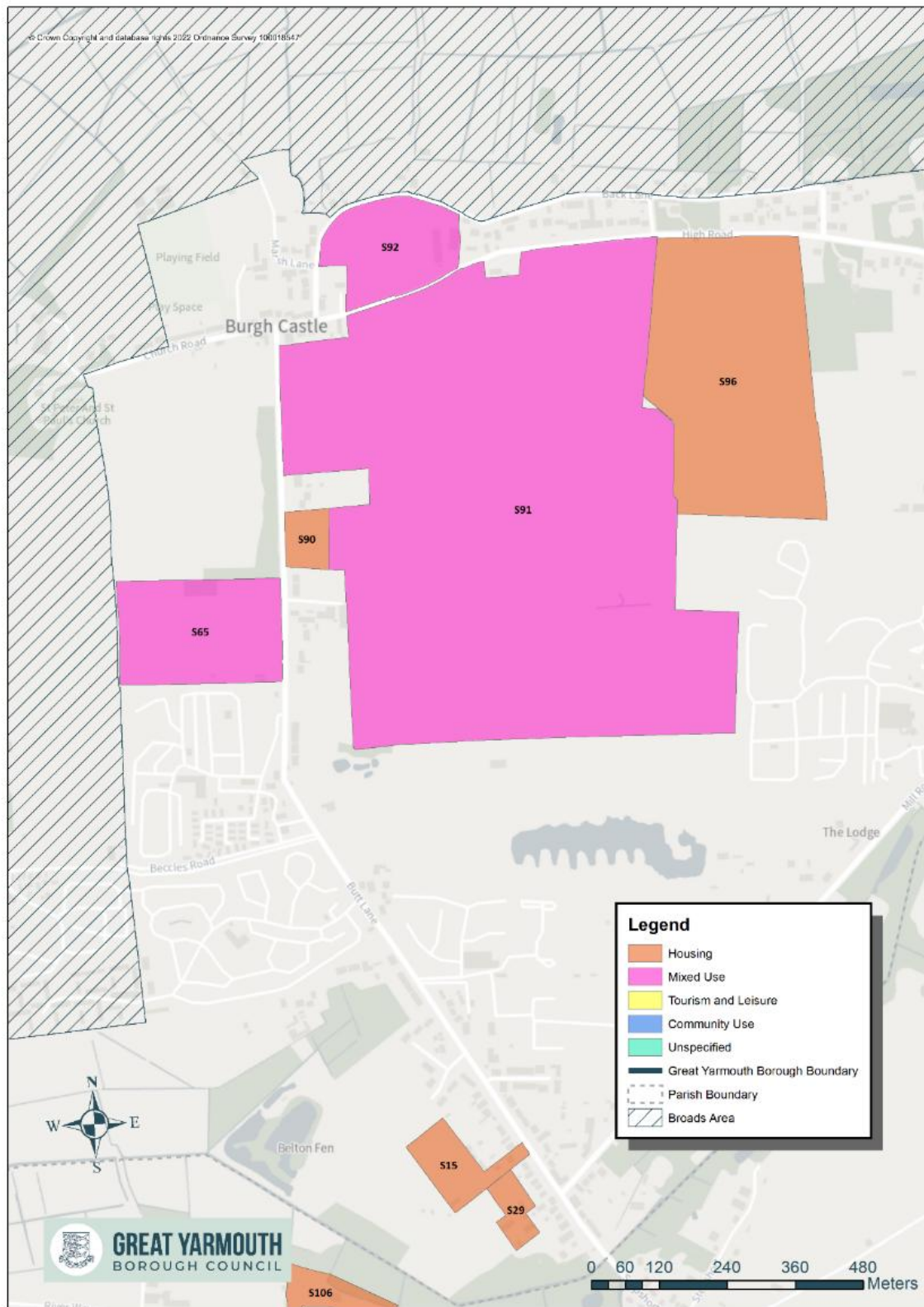
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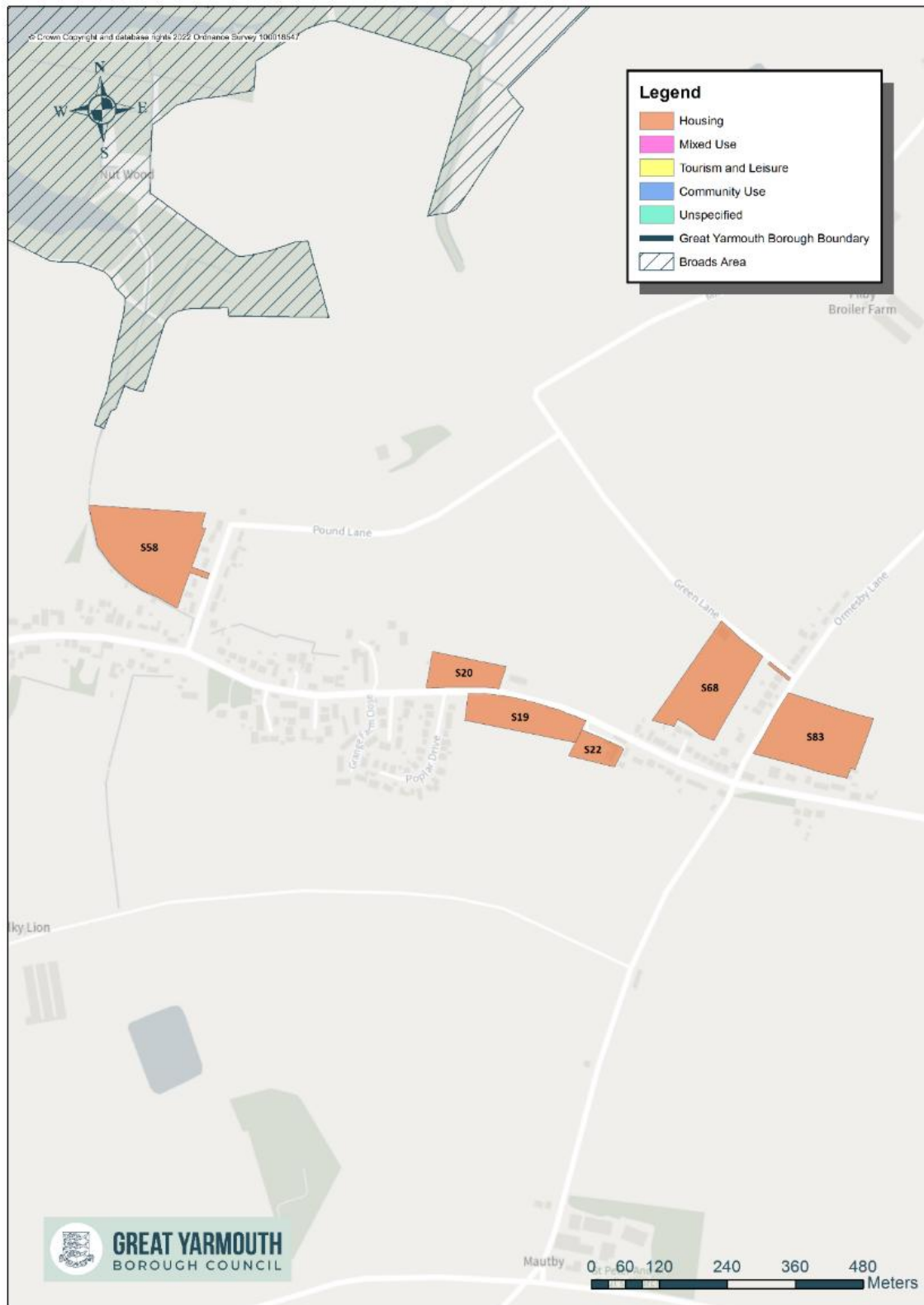


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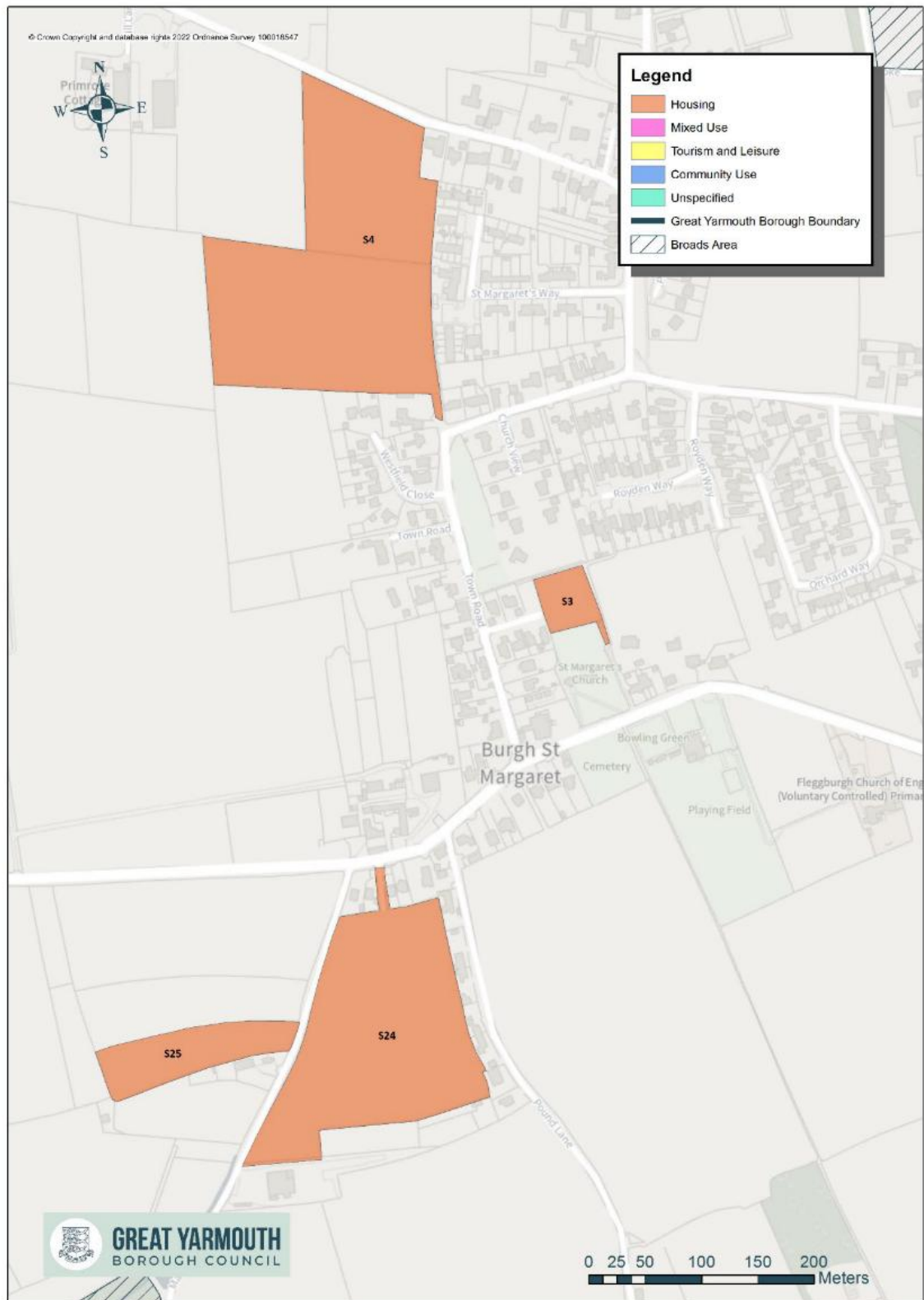


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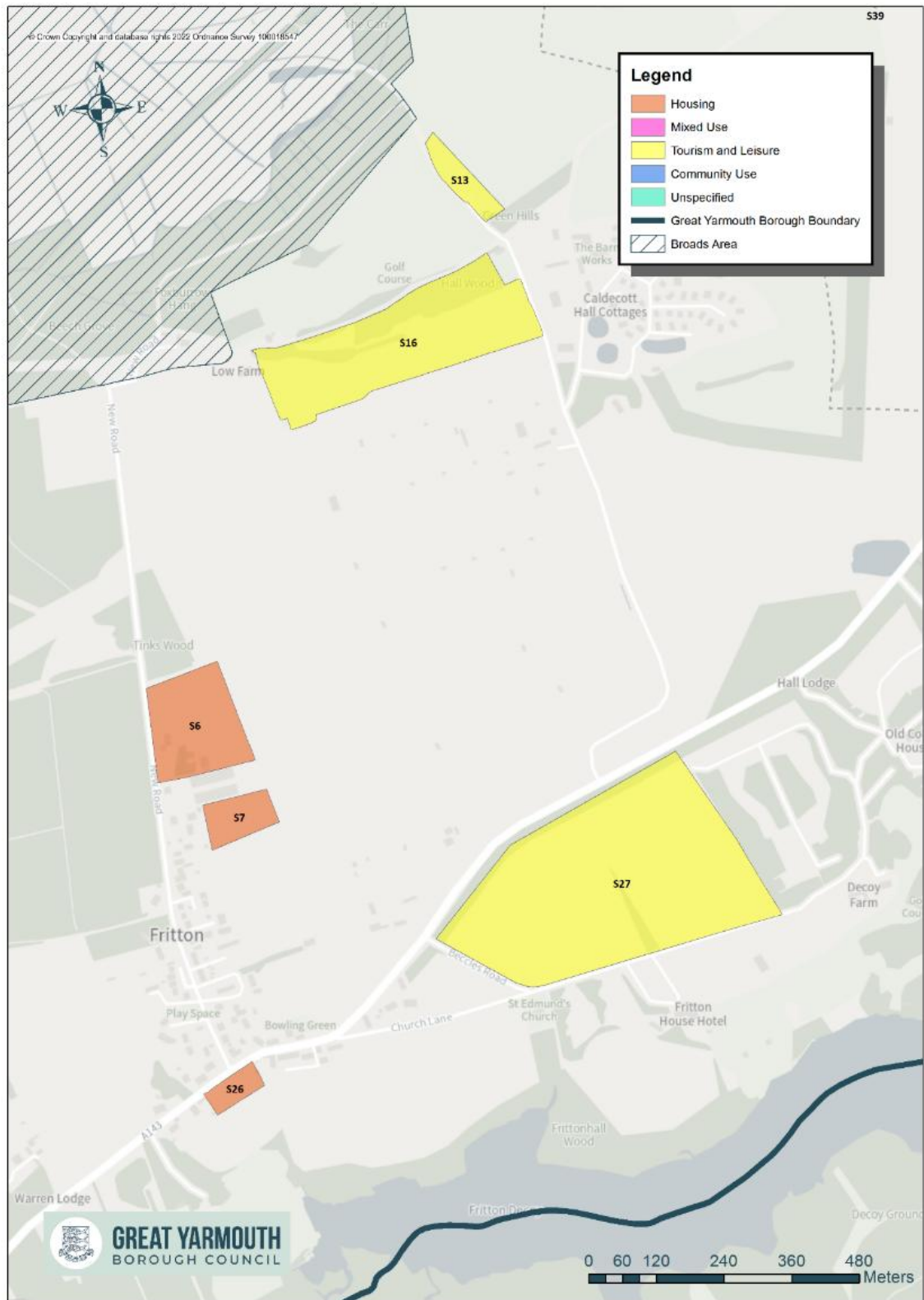




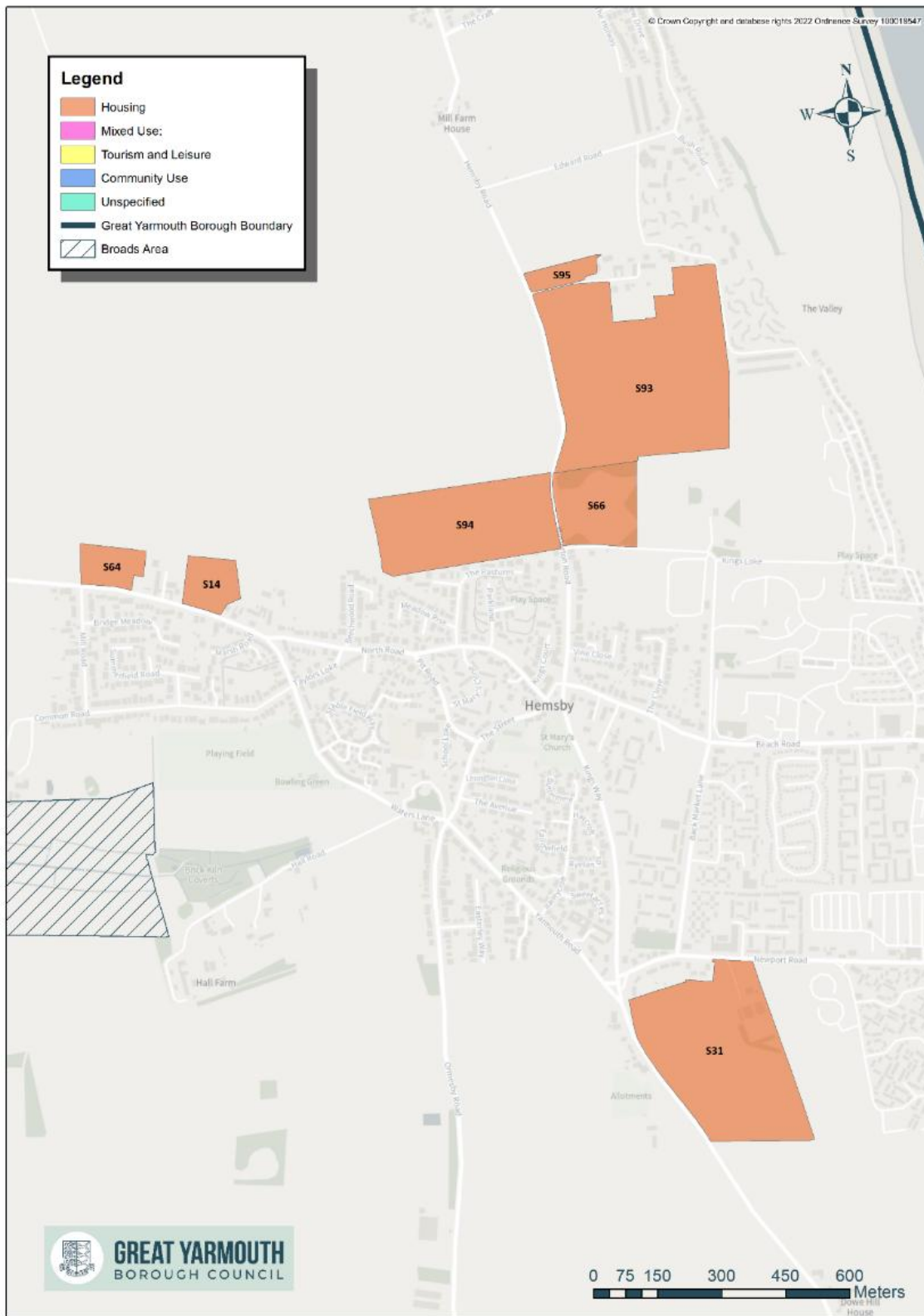
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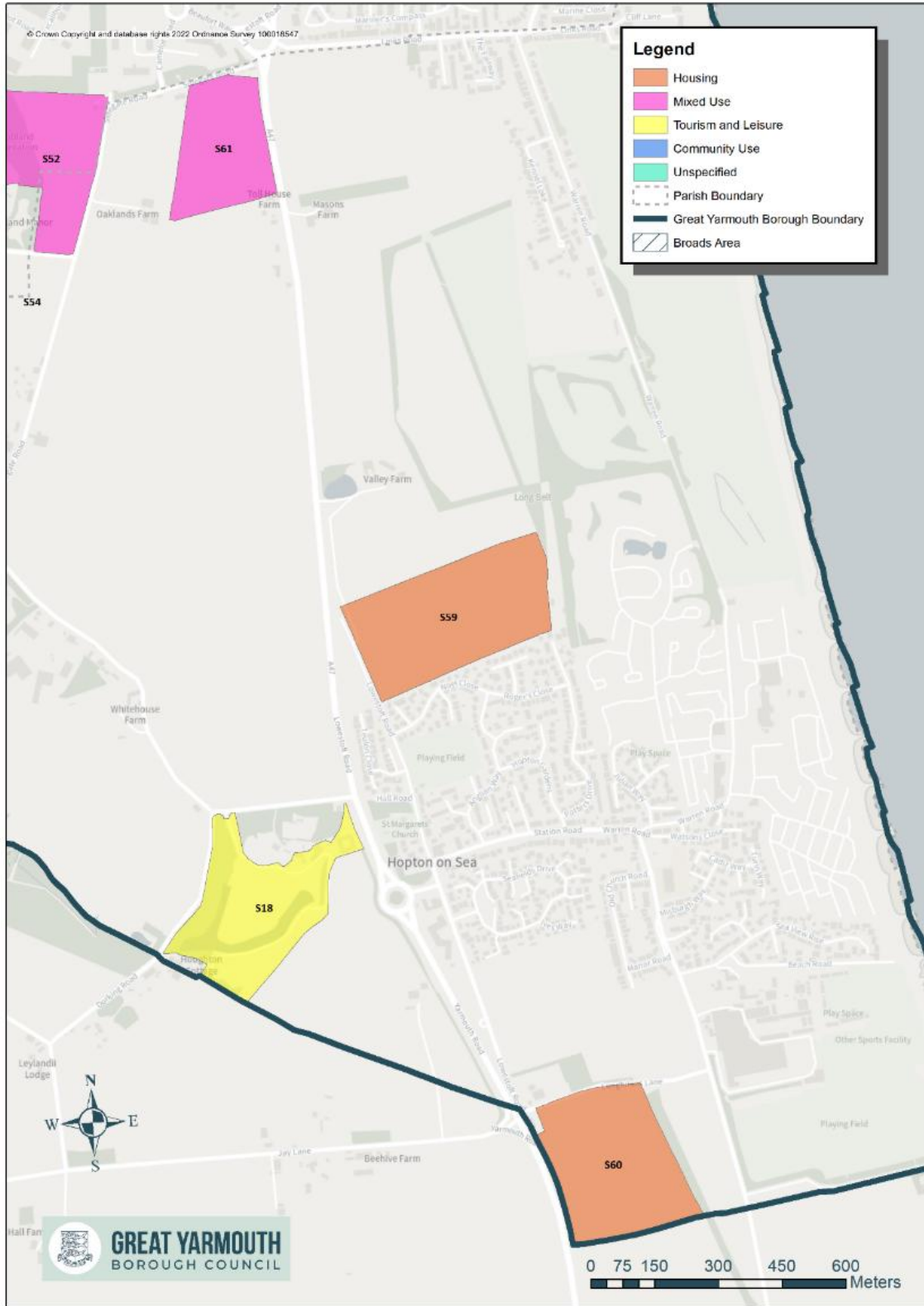
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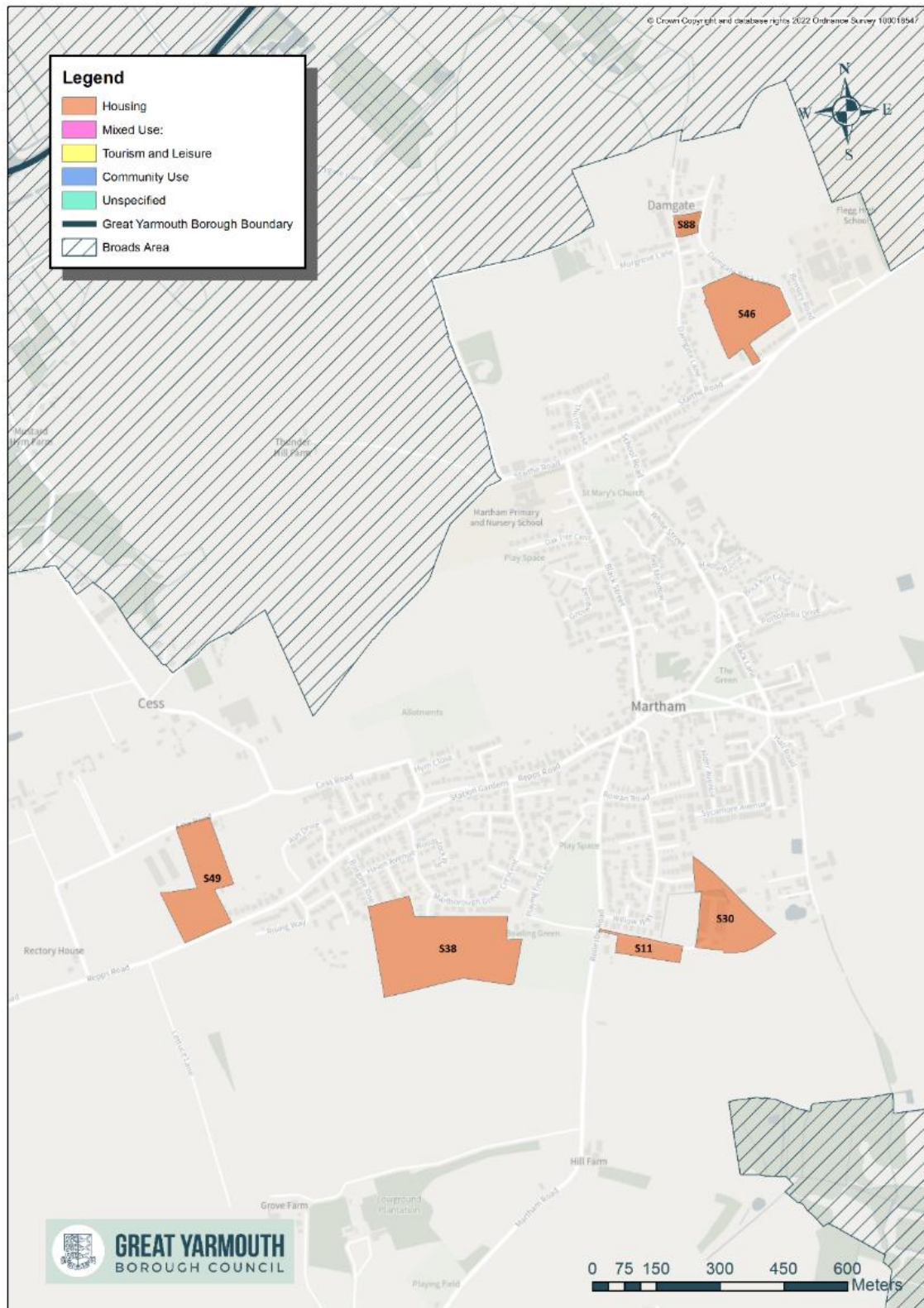
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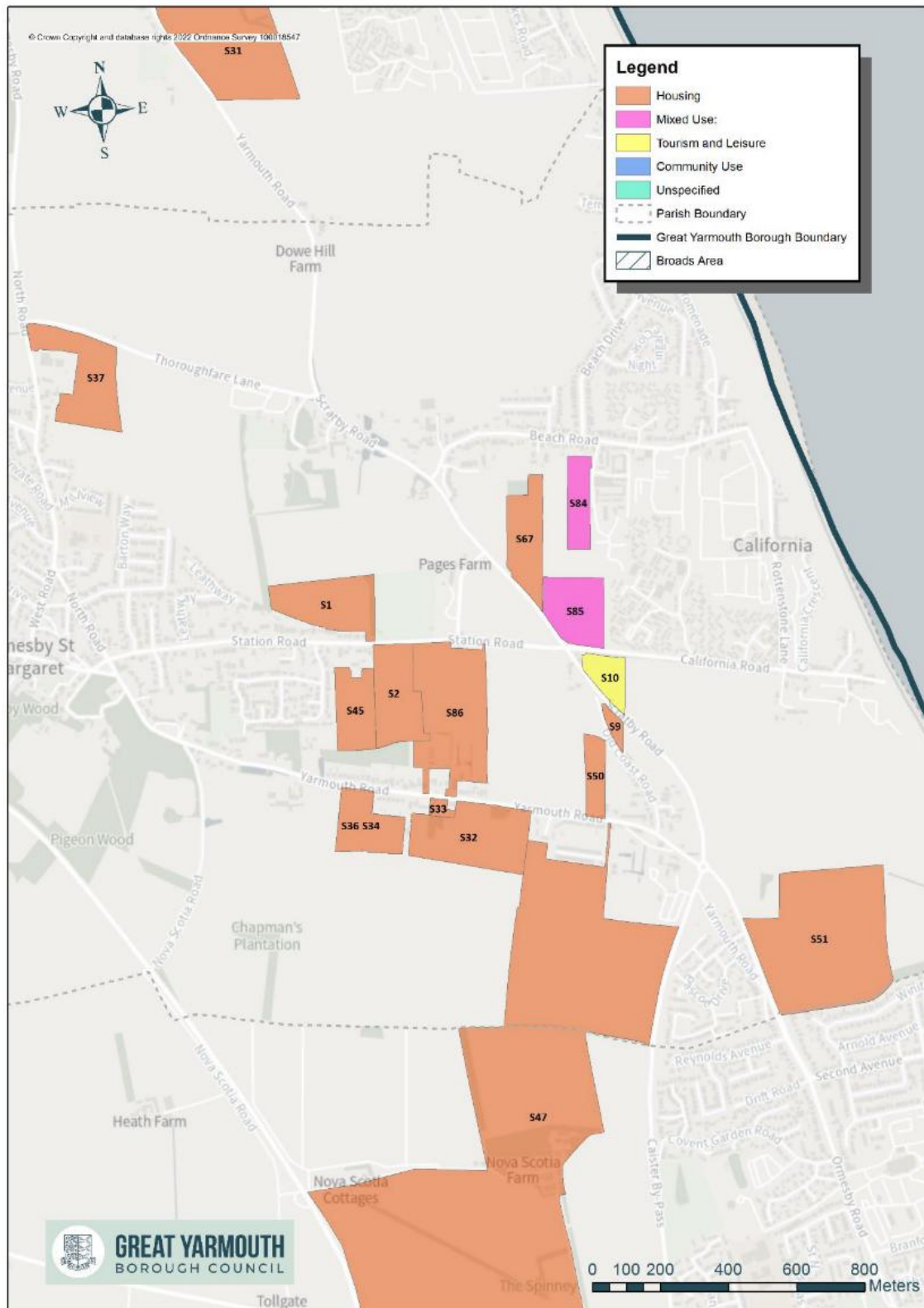
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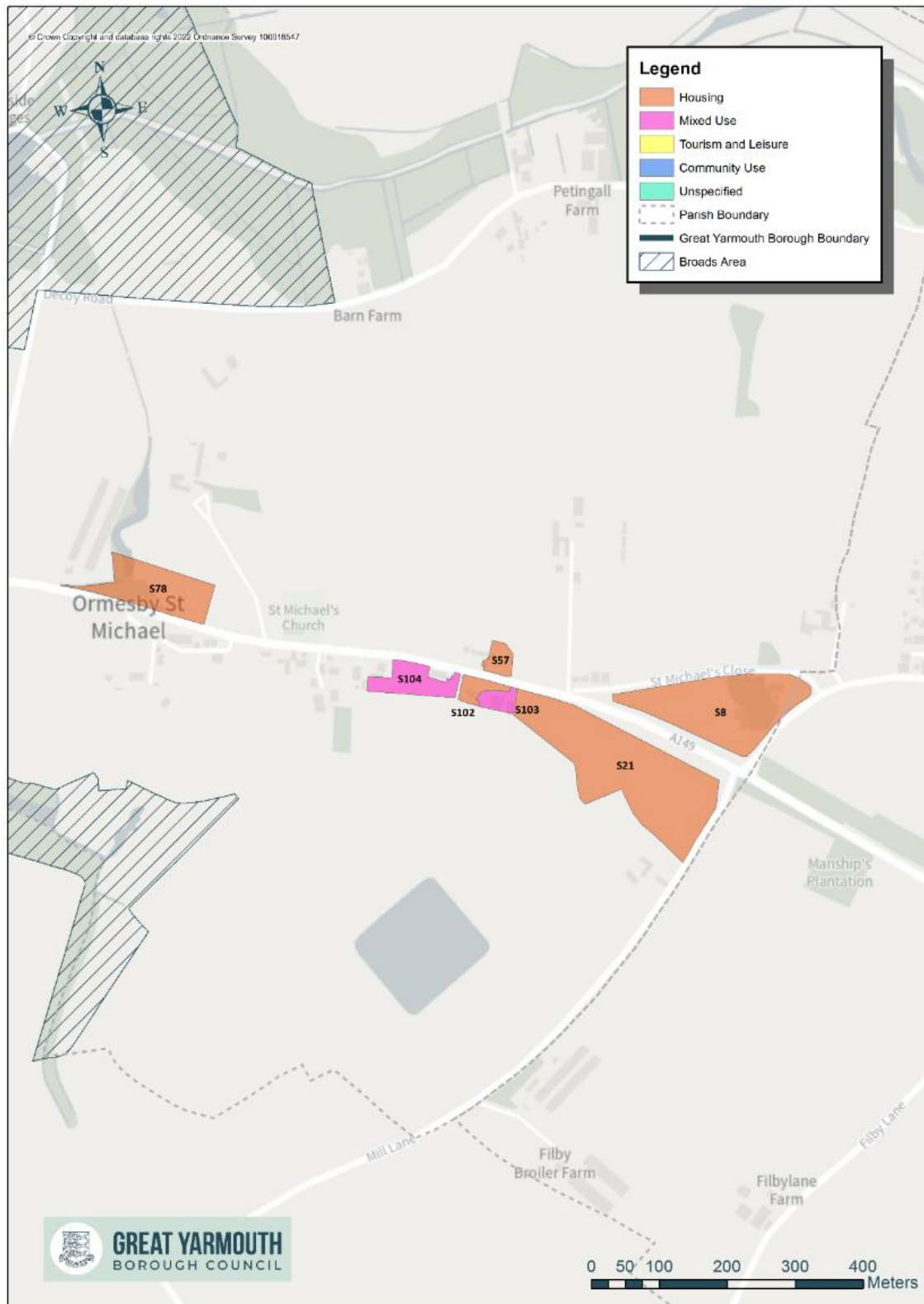
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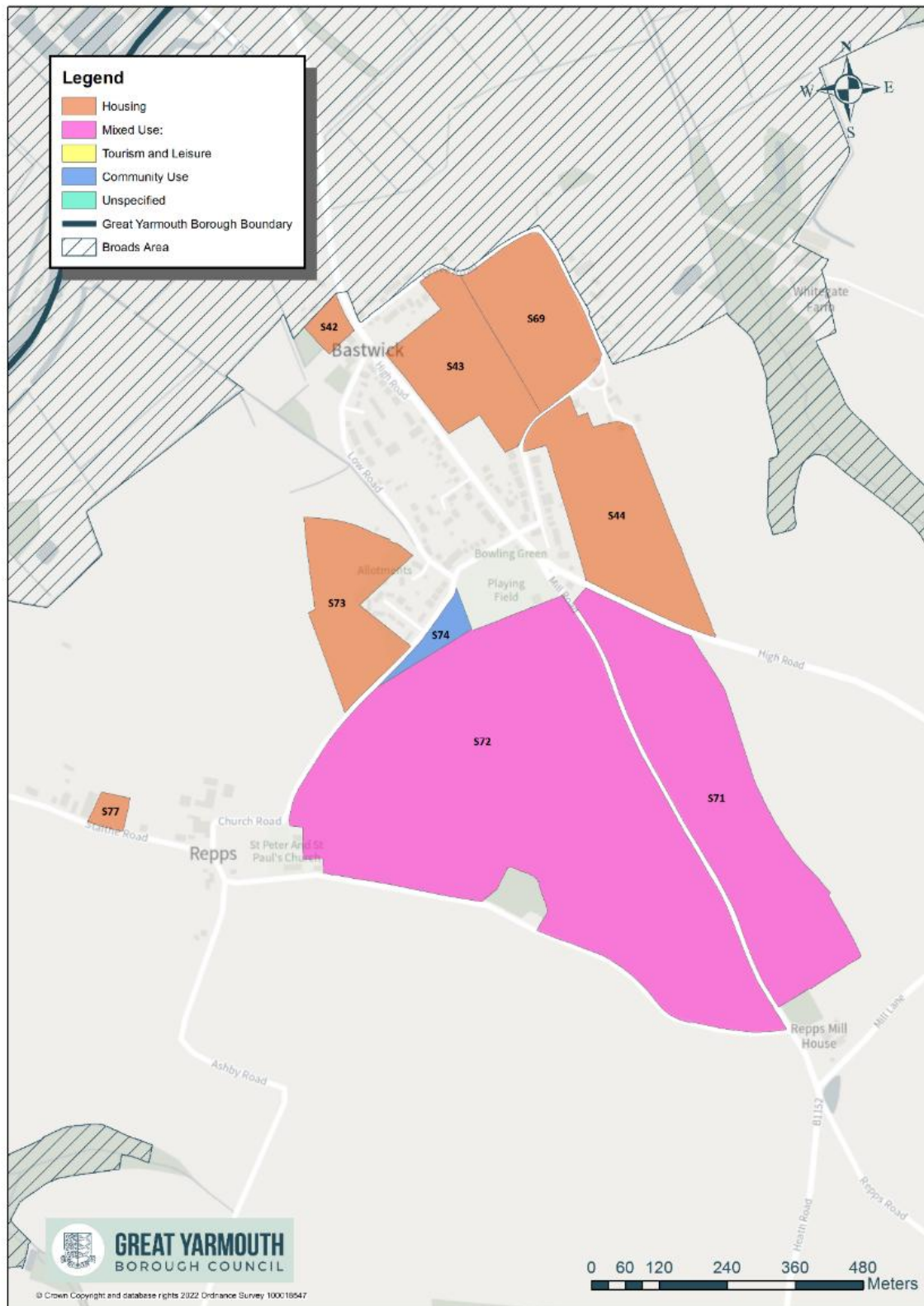
Ormesby St Margaret and Scratby



Ormesby St Michael



Repps with Bastwick



URN: 22/278

Subject: Spending of Developer Contributions (Section 106/Section 111) on Open Space provision

Report to: Policy and Resources Committee – 6th December 2022

Report by: Sam Hubbard, Strategic Planning Manager

SUBJECT MATTER

Agreeing a process for spending developer contributions on open space provision

RECOMMENDATION

That Policy and Resources Committee approve the approach set out in the report to spending developer contributions towards open space.

1. Introduction

- 1.1. The Council has had planning policies in place for many years which require developers of new housing developments to provide new open space on-site or make financial contributions towards the provision of open space off-site. The most recent incarnation of that policy is Policy H4 in the Council's Local Plan Part 2 which is supported by the emerging Open Space Supplementary Planning Document.
- 1.2. Contributions for off-site provision have historically been pooled from a small number of developments to deliver improved open spaces in the localities of those developments. There have been no set procedures or protocols on how decisions on spending these contributions are made.
- 1.3. The Government is keen for greater transparency with regard to the collection and spending and now requires local planning authorities to publish the amount of money collected from developers and spent on infrastructure on an annual basis. The Planning Advisory Service recommended having established procedures and governance with scope for community engagement when it comes to spending developer contributions
<https://www.local.gov.uk/pas/topics/developer-contributions/improving-governance-developer-contributions-full-guidance> .
- 1.4. Given the above it is considered necessary to have an up to date transparent and fair process to determine how developer contributions towards open space are spent.

2. Proposed Process

- 2.1. It is proposed that the process runs alongside and feeds into the Council's capital programme where appropriate. This will allow for alignment with any capital funding from the general fund and other sources for open space improvements.
- 2.2. It is proposed to have a single 12-week window for inviting projects/bids for off-site open space improvements each year. It is proposed that this window takes place over July, August and September to give time to assess and consult on projects prior to finalising the capital programme. At the start of the window the amount of funds available (excluding allowances for ongoing repairs and maintenance) for each type of open space in each area will be updated and published on the Council's website. Details on any restraints on funding (as per the section 106 agreements from which the money was raised) will also be identified.
- 2.3. Projects/bids will be invited from Parish Councils, Ward Councillors, community groups, sport clubs and teams. Projects on Council-owned land submitted by third parties will need agreement from the Property and Asset team.
- 2.4. Projects/bids will be initially reviewed by the planning team to ensure they meet section 106 requirements. Eligible Projects/bids submitted will be consulted on for 21 days with:
 - Ward Members
 - Parish Councils where submission hasn't come from them.
- 2.5. Following consultation, eligible projects will be further reviewed by an officer group comprising officers from Planning and Property and Asset Teams, and finance. This will allow for consideration of projects alongside any projects that the Property and Asset Team have developed as a result of the Play Area Action Plan. Following this a report will be prepared on what bids/projects should be funded. Proposals for projects under £50,000 will be determined and signed off by the Strategic Director with responsibility for open spaces under existing delegations. Projects above this figure will be determined by the Policy and Resources Committee.
- 2.6. Reports and decisions will be made available online and spend will be reported annually as per legislative requirements.

3. Process for this year

- 3.1. The Property and Asset team have identified a number of urgent projects for improvements to open spaces as part of the play area action plan they have been working on. We are also aware of a number of projects Parish Councils are keen to progress. Therefore, rather than wait until July, it is proposed that a bid window is opened in January. A report on any projects to be funded would be considered in the spring.

4. Prioritisation

- 4.1. The emerging Open Space SPD sets out how contributions will be prioritised. Spending will be prioritised in line with the recommendations of the Open Space Needs Assessment (2022) the Playing Pitch Strategy (2022) and the Play Area Action Plan developed by Property and Asset team.

5. Maintenance Funds

- 5.1. Developer contributions collected under the new Policy H4 include an element to be reserved for funding the maintenance of the improved spaces (over a 20yr period). This varies by type of open space, but averages out at approximately 36% of the contribution.
- 5.2. Several section 106 agreements secured before Policy H4 was introduced allow for some of the funds to be spent on maintenance as well as capital improvements. These do not state the exact amount which should be spent on maintenance. It is proposed that the proportion of these contributions which are reserved for maintenance of the spaces is set dependent on the nature of the capital improvement being made.
- 5.3. Funds for maintenance associated with new capital projects will be transferred to a maintenance budget when funds are agreed for the capital projects on Council owned land. Where provision is to take place on private land or Parish Council land, the maintenance element will be transferred alongside the capital receipt, unless the Borough Council is to provide maintenance on behalf of the organisation.

6. Financial Implications

- 6.1. Some staff resource from the Strategic Planning team will be required to run the bid process. But focussing the bids to a single window should result in less staff time then dealing with ad-hoc requests.

7. Legal and Risk Implications

- 7.1. Section 106 contributions comprise legal covenants which dictate how the funds should be spent. It is therefore important that there is appropriate oversight of the spending of the money. The above process should help ensure this is achieved.

8. Conclusion

- 8.1. It is recommended that the above process is implemented.

9. Appendices

- 9.1. None

Areas of consideration: e.g. does this report raise any of the following issues and if so how have these been considered/mitigated against?

Area for consideration	Comment
Monitoring Officer Consultation:	Via ELT
Section 151 Officer Consultation:	Via ELT
Existing Council Policies:	
Financial Implications (including VAT and tax):	See Section 3
Legal Implications (including human rights):	See Section 4
Risk Implications:	See Section 4
Equality Issues/EQIA assessment:	n/a

Crime & Disorder:	n/a
Every Child Matters:	n/a

CONFIDENTIALITY

The content of the appendices of this report qualifies as exempt information under section 100(A) (4) and paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972 as it is "information relating to the financial or business affairs of any particular person (including the authority holding that information)"

In relation to the "exempt" information, it has been determined that the public interest in maintaining the exemption outweighs the public interest in disclosing the information because disclosure would adversely affect the authority's ability to manage its commercial financial and business affairs.

Accordingly, it is proposed that the appendix to this report should remain exempt.

Subject – General Fund Asset Management Strategy 2022 - 2025

Report to – Executive Leadership Team – 2nd November 2022

Policy & Resources Committee – 6th December 2022

Report by: Head of Property & Asset Management



RECOMMENDATIONS

That Committee:

1. Reviews and approves the 2022 – 2025 General Fund Asset Management Strategy.

1. BACKGROUND

The Asset Management Plan 2022 – 2025 considers the Council's Asset holdings in relation to the Corporate Plan and the Medium-Term Financial Strategy objectives. It sets out aspirations to improve management and performance of the Council's property assets.

The attached strategy outline and confidential appendix outline the approach and direction for management of commercial, operational and community assets for the coming four-year period.

3. FINANCIAL IMPLICATIONS

No specific financial impacts.

The confidential appendix provides additional detail on specific asset holdings in each area.

4. RISK IMPLICATIONS

Considered within the strategy.

5. CONCLUSIONS

To review and adopt the Asset Management Strategy for the period 2022 - 2025

Area for consideration	Comment
Monitoring Officer Consultation	
Section 151 Officer Consultation	
Existing Council Policies See background papers	Considered
Financial Implications - within existing budgets	Considered
Legal Implications (including human rights)	No
Risk Implications	Yes
Equality Issues/EQIA assessment	No
Details contained in strategy	Yes
Crime & Disorder	N/A
Every Child Matters	N/A

2022
—
2025



**GREAT
YARMOUTH**
BOROUGH COUNCIL

GENERAL FUND

ASSET MANAGEMENT

STRATEGY

Contents Page

- 1. Introduction
- 2. Vision and Ambition
- 3. Current Property Assets
- 4. Management
- 5. Challenge Process
- 6. Conclusions
- 7. Appendix 1
- 8. Appendix 2
- 9. Confidential Appendices

1. Introduction

- 1.1 The Great Yarmouth Borough Council General Fund Asset Management Plan includes the Council's Commercial and Operational Asset holdings and considers opportunities for revenue and investment wealth creation with reference to 'The Corporate Action Plan', Short, Medium & Long Term Financial & Budget Strategy objectives. It sets out aspirations to improve management and performance (both financial and operational) of the Council's commercial revenue generating and operational assets.
- 1.2 The effective and proactive management of property assets creates a vital financial resource for the council. It is essential that further investment decisions, regeneration activities and rationalisation of the property estate are based on sound financial and business objectives.
- 1.3 The Strategy outlines the principles and framework that will underpin decisions around the best use of the assets.
- 1.4 The Asset Management Policy (appendix 1) clearly identifies the criteria, commercial assets must fit the revenue or investment criteria, and the strategic regeneration objectives. Operational assets must be fit for purpose, provide a safe and healthy working environment, offer value for money and support business, economic, and community needs.
- 1.5 The General Fund Asset Management Strategy outlines the Land & Property Acquisition Strategy and the Council's Facilities Management Strategy.
- 1.6 Governance is undertaken through a range of Council, Committee and delegated decision-making procedures identified within the Constitution

2. Vision and Ambition

- 2.1
- The Action Plan 2020-2025 clearly identifies the need to invest in Great Yarmouth’s future, sets out the broad strategic direction, priorities and targets for the Council, describes progress achieved to date, and charts the way ahead for the next 5 years.
- 2.2
- The Asset Management Plan supports the Council’s Plan, by detailing the strategic use of assets to support the Corporate Priorities:

Priority	Strategic Asset Strategy will utilise assets to:
Strong and Growing Economy	• support and deliver regeneration within the Borough • provide land and buildings suitable for development and where businesses can grow • deliver increased revenue (investment) income and capital value growth for the authority • continue expansion of Enterprise Zones and Energy Parks within the Borough. • take opportunities to improve and develop Great Yarmouth and Gorleston Town Centres and Seafront economies. • Introduce and develop new Tourism and commercial offers to extend the season and benefit economic regeneration.
Improved housing and strong communities	• Release surplus land wherever possible to support the development of residential housing in the Borough.
Quality and sustainable environment	• reduce the carbon footprint of all assets. • maintain and redevelop our assets to improve the physical landscape of our Borough. • Link with the GYBC Sustainability Strategy
Efficient and effective Council	• work to improve the Council financial sustainability. • optimise new opportunities to enhance assets and land for innovative use. • undertake professional evaluation of opportunities to develop assets through innovation or partnership funding.

3. Current Property Assets

- 3.1
- The Council's overall land and property portfolio is valued at £82,491,363 with the Investment portfolio accounting for £52,141,648 in the Financial Fixed Asset Register. Further detail in relation to specific assets is available in the Confidential Appendices.
- Current rent roll: £3.9m Per annum
- Selection of Prime assets includes: Artemis House, Seashore Holiday Centre, East Quay and Havenshore Great Yarmouth, Ambulance Station Gorleston, Marina Centre.
- 3.2
- The Council's portfolio can be separated into the following areas:
- **Operational** – those buildings owned or leased for the use of delivering public services (eg. Town Hall, Greyfriars, Depots etc)



- **Community** – land & buildings owned by the Council which are mainly in use for well-being and social interest of our communities (community halls, playgrounds, parks & open space)



- **Investment** – land and property owned by the Council to generate income and support economic regeneration. (Beacon Park, Seafront assets, Energy Park etc.)



4. Management

- 4.1

The Property and Asset Management Service is responsible for the management of the portfolio through the following teams:

 - Asset Management - Management and delivery of the investment portfolio, marketing of vacant properties, lettings, purchase and sale of assets, new leases, lease renewals, rent reviews.
 - Facilities Management – Repairs and maintenance of the operational and community assets of the Council. Conditions reporting, general repairs and maintenance, compliance, capital works and building service support. (Note FM does not include a full hard and soft FM service such as cleaning, security, catering, contract management).
 - Systems & Performance – data management and recording in relation to all general fund assets.
- 4.2

Progress since the last ASM includes:

Asset Type	Current Position and Progress
Operational Buildings	Since 2021 there was a rationalisation of Operational Buildings resulting in the vacation of Maritime House which was the Tourist Office. The Council is now operating from four public buildings: Town Hall Greyfriars Novus House and Catalyst

Seafront Assets are considered strategically important for Tourism within the borough. With the development of a new £26m Marina Centre, redevelopment of the Waterways and Boating Lake together with the introduction of new attractions such as a 50m Observation Wheel.

Great Yarmouth seafront benefits from a wide range of assets occupy land along the length of the Great Yarmouth from North Denes through to central and South Denes with income totalling £1.03m representing 26% of the whole portfolio.

Gorleston assets are fewer in relation to Great Yarmouth and are located for the harbour to the Beach Huts in the south, income in the area totals £125K representing 3% of the whole portfolio

Asset Type	Current Position and Progress
South Denes Energy Park	GYBC continues to support the port and energy sectors by unlocking sites, Millora House and Vanguard Point have been purchased, demolished, and marketed for economic regeneration with the develop of Incubator Units and business relocations to free the South Denes Assets also completed during this period. Further phases of development for Incubator Units will require the relocation of non-energy related businesses, Property and Asset Management are working with the occupiers to identify alternative sites.
South Denes Assets in the Outer Harbour hinterland (South of Hartman Road)	Freehold Council land at the southernmost point of the river is to be developed as an Operations and Maintenance Base following the successful relocation of a quayside company to provide land area for use by the Offshore Energy Sector. The £21m development is undertaken in partnership with the LEP and Norfolk County Council. Development of this site is driven by the opportunity to continue the drive growth in the business economy, strengthen the links to the offshore energy sector, encourage and grow training and career progression opportunities for the Borough. A South Denes development masterplan is required.
Beacon Park	One of the most successful Enterprise Zones within the Country operating at 95% occupancy. Significant developments and land sales see the park continuing to grow. Neighbourhood facilities are planned to commence shortly with a supermarket, fuel filling station and drive through facilities all part of the new offer. Local Plan part 2 has confirmed the addition of a further 20 hectares of land to for a Beacon Park Extension zone. 10 hectares of this land carries Enterprise Zone status. The extension zone would provide future high quality business facilities, opportunities for growth and expansion of existing businesses as well as development of new. The land is accessed through the existing Enterprise Zone and provided excellent links to road networks and the soon to be operational 3rd River Crossing.

Asset Type	Current Position and Progress
Market Place - Town Centre Regeneration	First phase of the new market development has opened with work progressing on the 2nd and 3rd phase together with public realm improvement with the support of the Future High Street Fund. Works to facilitate a town centre Library and University offer are ongoing in the Market Place. Through the benefit of Future High Street Funding (FHSF) and Town Deal Funding Great Yarmouth town centre stands to be transformed with the increase of public realm offering opportunities for events, specialist markets and the opportunity to increase evening entertainment and events. With the introduction through the Densification Intervention of the FHSF increasing the number of residents in town centre accommodation bringing additional footfall and vibrancy to the area.
Other investment assets	The Council has a significant number of regeneration projects for which the Borough will see benefit over the five years of the AMS. The opening recently of the Marina Centre has transformed the central Great Yarmouth seafront. Over the coming years projects such as the redevelopment of the Winter Gardens will see an important asset reopened to the public offering additional seafront entertainment. Residential developments close to the town centre on The Conge will further add to residence benefiting from addition services in the centre and proposal for the regeneration of North Quay will further provide for a potential range of leisure, retail and residential.

Summary of the Investment Portfolio:

26% Great Yarmouth Seafront (£1.03m)

3% Gorleston Seafront (£125K)

71% - Office, Industrial, warehouse and quayside assets (£2.775m)

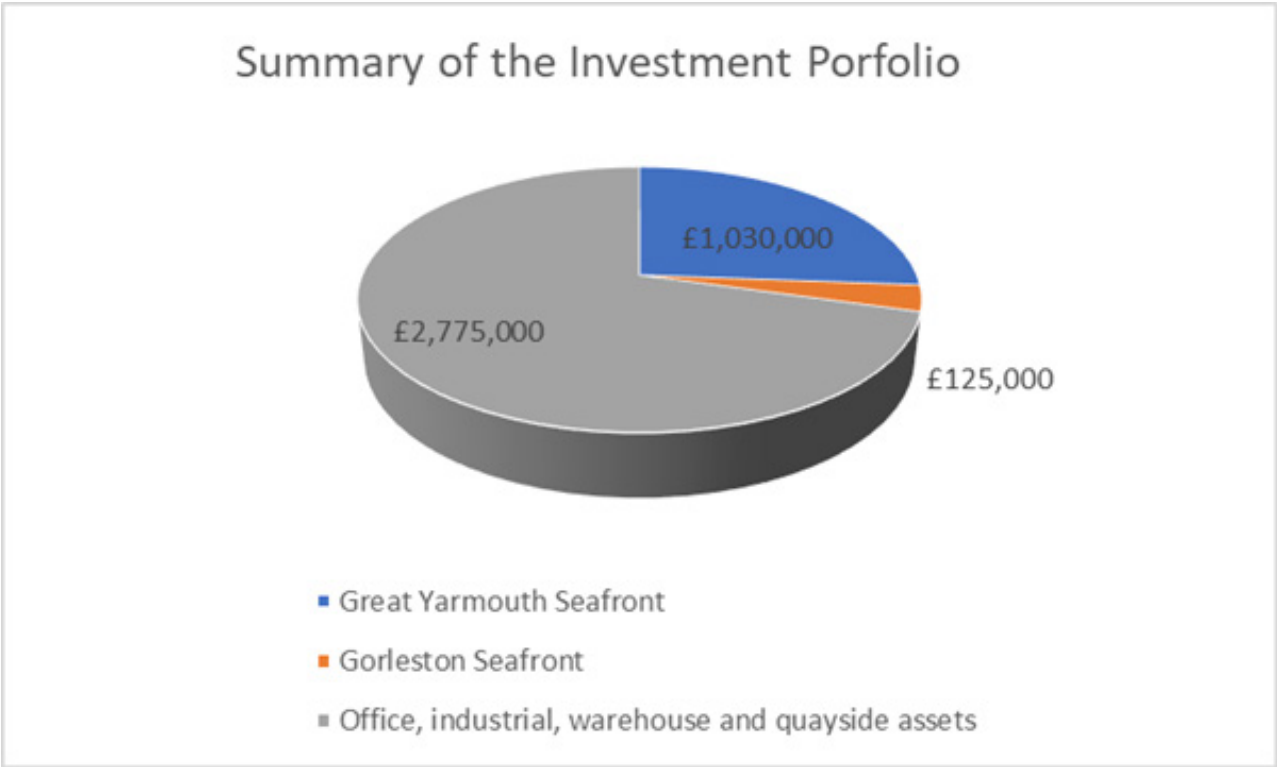


Chart showing summary of the Investment Portfolio – value of assets

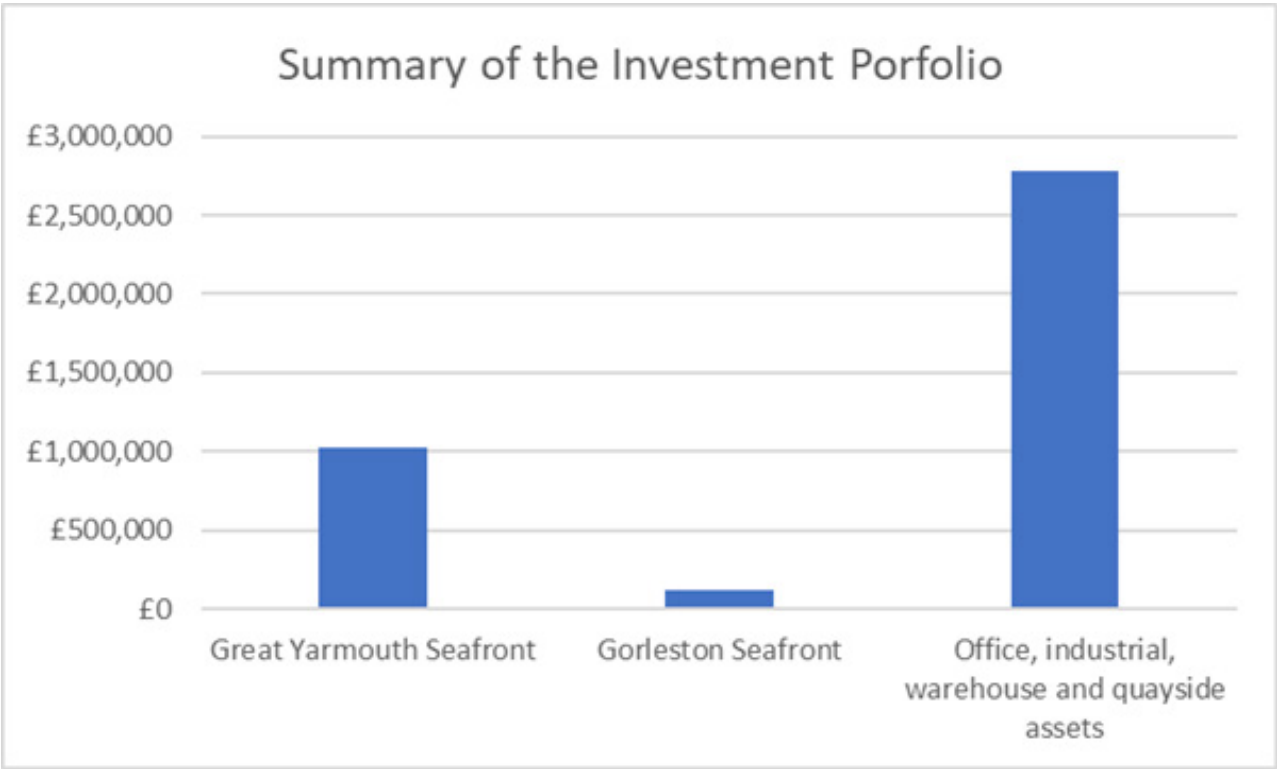


Chart showing summary of the Investment Portfolio – value of assets

- 4.3 Significant savings are required by the Medium-Term Financial Strategy and the Asset Management Strategy works to support this through management of existing assets, asset disposal (enabling repayment of borrowing) and increased development to generate additional revenue streams.
- 4.4 Income generation through the investment portfolio already generate £3.9m to the revenue account this AMS identifies annual building reviews which would be targeted to reduce outgoings and maximise income. A target increase of 10% year on year is anticipated through this management process of rent reviews, new opportunities, asset restructuring or rationalisation, development or disposal.
- 4.5 When assessing the top 20 Investment properties (based upon rental income producing £2.5m of the £3.9m described above) the average lease end date is February 2048. There are 3 vacant properties in this top 20 list, all linked to the ongoing O&M base project. 7 leases expiring before 2026 account for £0.82m in rental income, though these leases are associated with ongoing businesses which are highly likely to enter into a new lease agreement. A full breakdown of income and lease dates is included in [Confidential Appendix X](#).

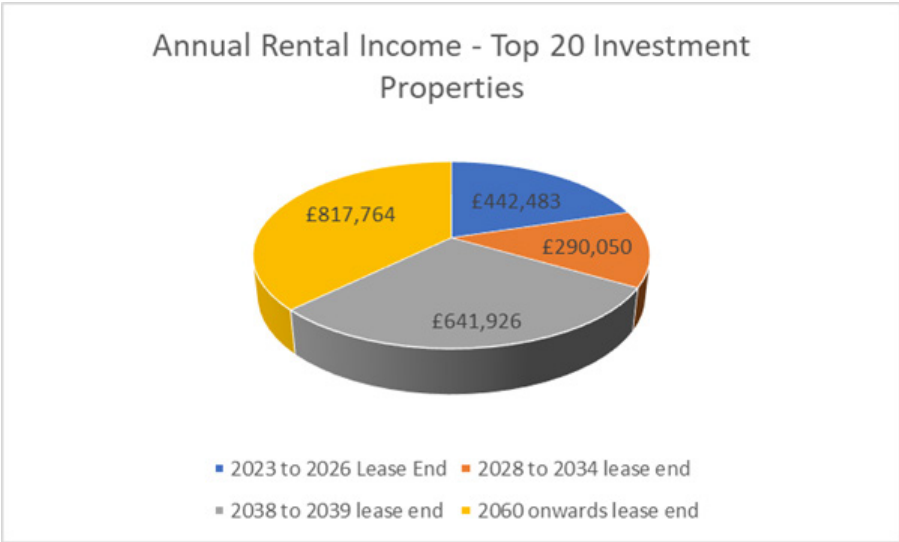


Chart showing value of rental income of top 20 investment properties over current lease terms.

- 4.6 GYBC utilise a contract with ESPO to procure gas and electricity contracts for its entire usage. ESPO offer best value for tariffs by using bulk buying powers and negotiation with suppliers. Currently this means the Council enters into contracts through Total Energies, typically fixed 12-month contracts. ESPO offer guidance on market trends and anticipated changes to allow decisions to be made on entering new contracts early if beneficial. The Property and Asset Management team actively look to reduce gas and electricity usage wherever possible (e.g. rolling programme of street light renewals, installation of movement sensors, reviewing heating systems at main offices) and provide members with options for reduced usage for consideration. Utility costs will continue to present a challenge for the Council – Total gas and electricity costs in 2021/22 were £346,508 with a predicted spend in 2022/23 of £553,443 with 2023/24 predicted to rise to £843,961 (based on current estimated usage and costs).

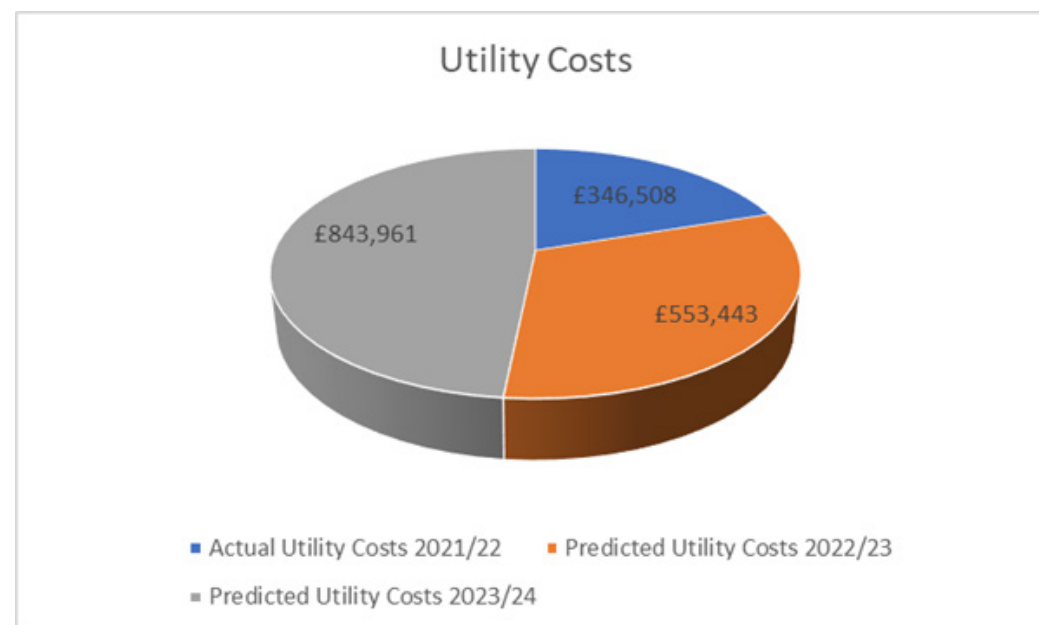


Chart showing actual and predicted utility costs through to 2023/24

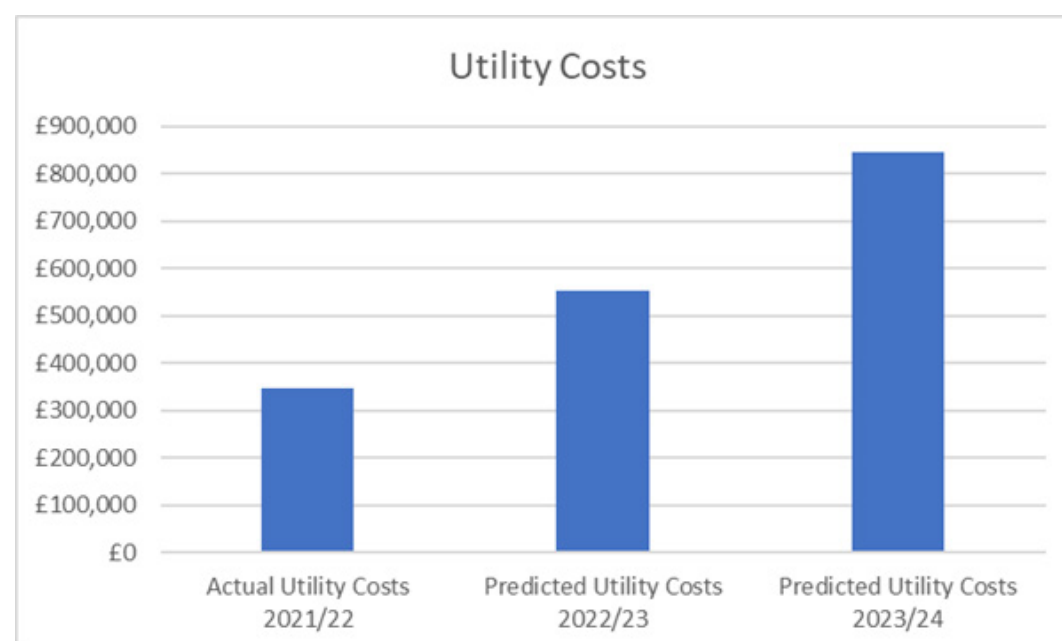


Chart showing actual and predicted utility costs through to 2023/24

- 4.7 The Asset Register is computerised and holds data relating to all Council freehold and leasehold interests, both past and present, in addition to management information which will assist with the strategic management of the portfolios in the longer term. The register offers the ability to identify opportunities, risks and disposals. Data will be used to review investment properties on a priority basis using the challenge process. Operational buildings will include consideration of operating costs, condition reports and future anticipated capital works. The portfolio is currently split; Operational 1%; Community 24%; Investment 75%. Priority will be given to the Investment portfolio with a target of reviewing annually the worst performing 10% of the Portfolio.
- 4.8 Leases operate on a mix of tenure and lease responsibilities from ground rent through to full building repairing leases. Lease renewals/rent reviews represent approximately 20% of the investment stock annually meaning that on an annual basis risks for the authority are identified on the risk register as moderate to low.
- 4.9 The Investment Portfolio generates 64% of its current revenue income from the top 20 assets held (Artemis House, Seashore Holiday Park, East Quay, Marine Base, Ambulance Station – Excalibur Road, Racecourse, Southtown Wharf, Unit 5 Mallory Road, Unit 3 Mallory Road, The Brineplant, Minerva House, Please Beach Gardens, Britannia Yard, Ocean Yard, Pirates Cove, Ocean Room, Atlas Terminal, Havenshore Base, Sealife Centre, Unit 2 Wellington Park, Unit 3 Wellington Park, Merrivale Model Village), with the top four assets generating 30% of the income for the Council. This is both a benefit and a risk through creation of high value returns but limited to a smaller number of sites. The asset portfolio does however offer mitigation to this through the wide variety of land and property holdings across the remaining 70% of the portfolio.
- 4.10 The data system (Concerto) provides a Dashboard providing information relating to occupancy levels, rent reviews due and undertaken, income, property condition, repairs and maintenance and utilities information. The system will be available to view by Elected Members, Executive Leadership, Management Team and responsible officers.
- 4.11 The system provides information relating to current leases, rents, rent renewals of all investment properties. For the operational and community buildings occupied by the Council the data includes condition survey reports anticipated capital and revenue costs likely to be incurred based on condition of the next 10 year period. This information is utilised to create the additional capital and revenue requirements for these properties on an annual basis.

5. Vision and Ambition

- 5.1 It is important to regularly review assets held within the portfolio to ensure they remain fit for purpose and aligned to the corporate priorities and objectives. In order to do this, an Asset Challenge Process is detailed at Appendix 2. Included in this would be an annual review of the purpose and performance of the asset, depending on the outcome of the review a decision process to ascertain next steps – retain, redevelop, dispose, acquire would be undertaken. This process includes consideration of the facilities management of the building, repairs, maintenance and complete operating costs of the property. Appendix 2 outlines the process to be followed.
- 5.2 The challenge process includes consideration of annual and capital management costs of the asset. Data within Concerto and Integra will be utilised as part of the process to provide clear evidence linked to the four options.

6. Conclusions and Action Plan

- 6.1 The General Fund Asset Management Strategy identifies the aims, objectives and outputs in proactively and effectively managing the Council's General Fund operational and investment assets.
- 6.2 Management of the stock and data recording is undertaken through use of the Concerto Database. High level information relating to occupation, lease renewals, rental and stock condition will be available via a management dashboard. Reporting tools are provided to ensure that the team can proactively plan ahead prior to lease end dates. Effective data management should enable the asset management team to proactively undertake estate management tasks and protect the value of the income and asset.
- 6.3 Concerto will be used to identify the assets for review through the challenge process annually.
- 6.4 Costs of running the GYBC operational estate will be presented in a transparent format.
- 6.5 Occupancy levels across the GYBC operational estate will be presented a transparent format for key decision making and presented regularly to the appropriate governance structure, e.g. Executive Leadership Team.
- 6.6 Property condition information will be updated and maintained using the Concerto Database and reflected in the Repairs and Maintenance Plan to assist annual budgeting.
- 6.7 Property condition information will be utilised in setting annual revenue and capital budgets requirements.

- 6.8 Regular conditions surveys will be continued across properties to identify the level of required repairs and maintenance. Routine works will be funded through the Repairs and Maintenance budget with larger, higher value works being subject to a capital bid. This information will be considered as part of the challenge process as detailed in Appendix 2 and annual budget round.
- 6.9 The commercial properties are let on full repairing leases to minimise the cost risk on the Council's assets with a tenant in place. The exception to this is the leisure facilities (Marina and Phoenix Centres) which have some level of joint repairs and maintenance responsibilities between the operator and The Council.
- 6.10 Future capital projects are to be prioritised based on three main outcomes:
- Reducing ongoing running and maintenance costs to The Council,
 - Increasing rental income,
 - Sustainability.
- Capital bids and applications for funding will be subject to a full business case.
- 6.11 GYBC will review and develop an effective Facilities Management Strategy including both 'hard and soft' FM.
- 6.12 GYBC will review the Acquisition & Disposal Policy to ensure it remains up to date and includes for example, acquisitions by auction and that acquisitions are aligned to the Councils regeneration and economic growth ambitions.

Appendix 1 – Asset Management Policy

Policy Aims	To support a strong and growing economy	To improve Housing and support strong communities	To provide a sustainable environment	To be an efficient and effective Council
Policy Objectives	To manage the corporate and investment assets of the council to build economic regeneration for the borough	To work to identify and provide good quality housing opportunities which will improve opportunities for people living in the borough	To improve the value of our physical and built environments for the benefit of all.	To create a portfolio which is efficient, effective, and economic that optimises financial returns and commercial opportunities
		To work with communities to improve opportunities for residents		
Behaviours	Manage capital projects effectively and efficiently for the benefit of the organisation	Working with internal and external stakeholders to understand building requirements	Review and manage utilities costs to mitigate cost increases and reduce energy consumption	Recognise all property assets as a benefit to the organisation
	Use data to support evidenced based decision making	Identify areas of land for residential development opportunities	Maximise carbon reduction within all existing assets and ensure new buildings are carbon efficient.	Utilise new technology to improve the use/ operation of buildings
	Reviewing operational properties to identify savings and rationalisation	Maximise residential within the Town Centre in line with FHSF objectives		To ensure properties are flexible to respond to the needs of the service
	Review the Investment portfolio on a prioritise risk basis of a minimum of 10% of properties per annum			Deliver effective and efficient facilities management services minimising cost and maximising opportunities

Appendix 2 – Asset Challenge Process Map

Annual Review	Strategic Fit - Does the asset contribute or detract from corporate priorities - Category of asset – operational, investment, community - Achieving within the category Performance of Asset - Financial and non-financial outcomes of the asset – to include the operational costs of the building – repairs, maintenance, anticipated existing and future capital costs, utilities, compliance, annual inspections. - Financial and non-financial benefits of the asset – potential income generation opportunities existing and new, saving options.
	If the answer to both of the above questions is positive retain asset, negative results in either area would lead to consideration through the next section:
	Opportunities - Opportunities for the asset now and in the future - What barriers might exist to achieving opportunities - Risks and how these might be managed
	Option Appraisal - Review performance, opportunities, and risks - Options for the future - Costs and benefits of options - Risks of pursuing identified options
Asset Decision Process	Stakeholder Engagement - Asset management working group review - Review with ELT - Identify user group and undertake consultation if appropriate - Committee report Asset Challenge Outcome - Retain - Redevelop - Dispose - Acquire



Subject: 2022/23 TREASURY MANAGEMENT MID YEAR REPORT

Report to: Policy and Resources Committee - *****

Report by: Financial Services Manager



SUBJECT MATTER/RECOMMENDATIONS

This report presents for the 2022/23 financial year the following:

- the mid-year position for treasury management;
- the borrowing requirement and debt for the current financial year;
- the mid-year borrowing position;
compared with the Treasury Management Strategy.

Recommendations:

Members are asked to approve the treasury management half yearly report for 2022/23.

1. INTRODUCTION AND BACKGROUND

- 1.1. The Council adopted the Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice (the CIPFA Code) which requires the Council to approve treasury management semi-annual and annual reports.
- 1.2. The Councils treasury management strategy for 2022/23 was approved by Council on 8th February 2022. The Council has borrowed and invested substantial sums of money and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of risk remains central to the Councils treasury management strategy.
- 1.3. CIPFA published its revised Treasury Management Code of Practice [the TM Code] and Prudential Code for Capital Finance in December 2021. The key changes in the two codes are around permitted reasons to borrow, knowledge and skills, and the management of non-treasury investments. The principles within the two Codes took immediate effect although local authorities could defer introducing the revised reporting requirements within the revised Codes until the 2023/24 financial year if they wish, which the Council has elected to do.
- 1.4. Treasury risk management at the Council is conducted within the framework of the TM Code. This Code now also includes extensive additional requirements for service and commercial investments, far beyond those in the 2017 version.
- 1.5. This report provides a monitoring position for the first six months of the 2022/23 financial year.

2. LOCAL CONTEXT

- 2.1 On 31 March 2022, the Council had net borrowing of £85.603 million arising from its revenue and capital income and expenditure. The underlying need to borrow for capital purposes is measured by the Capital Financing Requirement (CFR), while usable reserves and working capital are the underlying resources available for investment. These factors are summarised in Table 1 below.

Table 1: Balance Sheet Summary	31.3.22 Actual £m
General Fund CFR	£72.298
HRA CFR	£89.211
Total CFR	£161.509
Less: *Other debt liabilities	(£0.670)
External Borrowing	£160.839
Less: Usable reserves	(£42.400)
Less: Working capital	(£32.836)
Net borrowing	£85.603

** Finance leases, transferred debt that form part of the Councils total debt*

- 2.2 The treasury management position on 30 September 2022 and the change over the period is shown in Table 2 below.

Table 2: Treasury Management Summary	31.3.22 Balance £m	2022/23 Movement £m	30.9.22 Balance £m	30.9.22 Rate %
Long-term borrowing	£82.487	(£0)	£82.487	3.15%-4.95%
Short-term borrowing	£53.096	(£34.955)	£18.048	0.23%-4.44%
Total borrowing	£135.583	(£34.955)	£100.535	
Long-term investments	£1.000	£0	£1.000	N/A
Short-term investments	£9.000	£0	£9.000	0.15%-0.30%
Cash and cash equivalents	£39.887	(£26.819)	£13.068	0.85%-2.10%
Total investments	£49.887	(£26.819)	£23.068	
Net borrowing	£85.603	£8.229	£77.467	

Note: the figures in the table are from the balance sheet in the Council's draft statement of accounts, but adjusted to exclude operational cash, accrued interest and other accounting adjustments. Long-term investments consist of CCLA Property Fund a mid-long-term strategic investment and short-term investments consist of Local Authorities.

- 2.3 The decrease in net borrowing in table 2 is result of a fall in short-term borrowing and cash and cash equivalents held. The requirement to borrow has reduced due to increased internal resources this is largely as a result of remaining funding balances of Government COVID grants held which are due to be repaid by the end of 2022/23.

3 BORROWING

- 3.1 CIPFA's 2021 Prudential Code is clear that local authorities must not borrow to invest primarily for financial return and that it is not prudent for local authorities to make any investment or spending decision that will increase the capital financing requirement, and so may lead to new borrowing, unless directly and primarily related to the functions of the Council.
- 3.2 PWLB loans are no longer available to local authorities planning to buy investment assets primarily for yield; the Council intends to avoid this activity in order to retain its access to PWLB loans.

4 BORROWING ACTIVITY – MID YEAR

- 4.1 As outlined in the treasury strategy, the Council's chief objective when borrowing has been to strike an appropriately low risk balance between securing low interest costs and achieving cost certainty over the period for which funds are required, with flexibility to renegotiate loans should the Council's long-term plans change being a secondary objective. The Council's borrowing strategy continues to address the key issue of affordability without compromising the longer-term stability of the debt portfolio.
- 4.2 Over the April-September period short term PWLB rates rose dramatically, particular in late September after the Chancellor's 'mini-budget', included unfunded tax cuts and additional borrowing to fund consumer energy price subsidies. Exceptional volatility threatened financial stability, requiring Bank of England intervention in the gilt market. Over a twenty-four-hour period, some PWLB rates increased to 6%, before the intervention had the desired effect, bringing rates back down by over 1% for certain maturities. A truly wild and unprecedented period in fixed income markets, with a direct impact on PWLB rates.
- 4.3 Interest rates rose by over 2% during the period in both the long and short term. As an indication the 5-year maturity certainty rate rose from 2.30% on 1st April to 5.09% on 30th September; over the same period the 30-year maturity certainty rate rose from 2.63% to 4.68%
Explain the impact on the authority, and current strategy
- 4.4 At 30th September 2022 the Council held £100.535m of loans, an decrease of £35.5m to 31st March 2022, as part of its strategy for funding previous and current years' capital programmes. Outstanding loans on 30th September are summarised in Table 3 below.

Table 3: Borrowing Position	31.3.22 Balance £m	Net Movement £m	30.9.22 Balance £m	30.9.22 Rate %	30.9.22 Maturity (years)
Public Works Loan Board	£71.386	£0	£71.386	3.15%-4.40%	10-40
*Banks (LOBO)	£3.000	£0	£3.000	4.95%	1-2
Banks (fixed term)	£7.000	£0	£7.000	3.35%-3.98%	<1-60
Local authorities (long-term)	£1.100	(£0.047)	£1.053	4.44%	>1
Local authorities (short-term)	£53.096	(£35.000)	£18.096	0.23%-4.44%	<1
Total borrowing	£135.582	(£35.470)	£100.535		

**The LOBO has a call option which the lender can exercise every 5 years the next call date is November 2024*

- 4.4 With short-term interest rates remaining much lower than long-term rates the Council considered it to be more cost effective in the near term to use internal resources or borrowed short-term loans instead. The net movement in short-term loans is shown in table 3 above.

- 4.5 The Councils borrowing decisions are not predicated on any one outcome for interest rates and a balanced portfolio of short- and long-term borrowing was maintained.
- 4.6 There remains a strong argument for diversifying funding sources, particularly if rates can be achieved on alternatives which are below gilt yields + 0.80%. The Council will evaluate and pursue these lower cost solutions and opportunities with its advisor Arlingclose.
- 4.7 LOBO loans: The Council continues to hold £3m of LOBO (Lender's Option Borrower's Option) loans where the lender has the option to propose an increase in the interest rate as set dates, following which the Council has the option to either accept the new rate or to repay the loan at no additional cost. No banks exercised their option during this period.

5 TREASURY INVESTMENT ACTIVITY

- 5.1 CIPFA revised TM Code defines treasury management investments as those which arise from the Council's cash flows or treasury risk management activity that ultimately represents balances which need to be invested until the cash is required for use in the course of business.
- 5.2 The Council holds significant invested funds, representing income received in advance of expenditure plus balances and reserves held. During the year, the Councils investment balances ranged between £61 and £21 million due to timing differences between income and expenditure. The investment position is shown in table 4 below.

Table 4: Treasury Investment Position	31.3.22 Balance £m	Net Movement £m	30.9.22 Balance £m	Rate %
Banks & building societies (unsecured)	£1.010	(£0.975)	£0.035	0.85%
Government (incl. local authorities)	£27.730	(£17.390)	£10.340	0.15%-1.85%
Money Market Funds	£20.000	(8.310)	£11.690	1.87%-2.10%
Other Pooled Funds - Property funds	£1.000	£0	£1.000	N/A
Total investments	£49.740	(£26.675)	£23.065	

- 5.3 Both the CIPFA Code and government guidance require the Council to invest its funds prudently, and to have regard to the security and liquidity of its treasury investments before seeking the optimum rate of return, or yield. The Councils objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income.
- 5.4 In furtherance of these objectives, no new long-term borrowing was undertaken in the first half of 2022-23. This strategy enabled the Council to reduce net borrowing costs (despite foregone investment income) and reduce overall treasury risk
- 5.5 The increases in Bank Rate over the period under review, and with the prospect of more increases to come, short-dated cash rates, which had ranged between 0.7% - 1.5% at the end of March, rose by around 1.5% for overnight/7-day maturities and by nearly 3.5% for 9-12 month maturities.
- 5.6 By end September, the rates on DMADF deposits ranged between 1.85% and 3.5%. The return on the Council's sterling low volatility net asset value (LVNAV) Money Market Funds ranged between 0.41% - 0.58% in early April and between 1.87% and 2.10% at the end of September.
- 5.7 Given the continuing risk and low returns from short-term unsecured bank investments, the Council is looking into more secure and/or higher yielding asset classes and review opportunities to do this where cash flow allows. Liquid cash was diversified over several counterparties and/or Money Market Funds to manage both credit and liquidity risks. £10m

that is available for longer-term investment which consists of £1m in CCLA Property Fund and £9m in Local Authorities.

- 5.8 The progression of risk and return metrics are shown in the extracts from Arlingclose's quarterly investment benchmarking in Table 5 below.

Table 5: Investment Benchmarking – Treasury investments managed in-house	Credit Score	Credit Rating	Bail-in Exposure	Weighted Average Maturity (days)	Rate of Return %
31.03.2022	4.25	AA-	43%	68	0.46%
30.09.2022	5.00	A+	53%	1.49	1.28%
Similar Las	4.23	AA-	67%	42	1.70%
All LAs	4.07	AA-	55%	18	1.72%

Weighted average maturity will apply to the first five categories above and to cash plus and bond funds.

**The 2022/23 TMSS set the limit per institution at £4m with which the Council complied. The above table does not include investments with the DMO £1.340m the total investments as of 30th September 2022 was £23m.*

*** £11.690m of the total £23m investments exposed to bail-in on 30/9/2022 was invested in Money Market Funds which are pooled funds which have a highly diversified portfolio of money market and other instruments. The Money Market Funds which are used by the Council to maintain high credit security and liquidity.*

- 5.9 Significant financial market volatility and uncertainty remain due to stagflation fears, little sight of the war in Ukraine ending soon and ongoing supply chain issues, a lingering problem over the past 30 months, yet to be fully resolved.
- 5.10 Externally Managed Pooled Funds: £1m of the Council's investments are held in externally managed strategic pooled Property funds where short-term security and liquidity are lesser considerations, and the objectives instead are regular revenue income and long-term price stability. These funds generated a return of £9k which is used to support services in year.
- 5.11 Because these funds have no defined maturity date, but are available for withdrawal after a notice period, their performance and continued suitability in meeting the Council's investment objectives are regularly reviewed. Strategic fund investments are made in the knowledge that capital values will move both up and down on months, quarters and even years; but with the confidence that over a three- to five-year period total returns will exceed cash interest rates.
- 5.12 The Council had budgeted £57,000 income from these investments in 2022/23. Income received (April-September) was £147,000, whilst a further £28,000 has been declared and is due to be paid by October.

6 NON-TREASURY INVESTMENTS

- 6.1 The definition of investments in CIPFA's revised 2021 Treasury Management Code covers all the financial assets of the Council as well as other non-financial assets which the Council holds primarily for financial return. Investments that do not meet the definition of treasury management investments (i.e. management of surplus cash) are categorised as either for service purposes (made explicitly to further service objectives) and or for commercial purposes (made primarily for financial return).

- 6.2 Investment Guidance issued by the Department for Levelling Up Housing and Communities (DLUHC) and Welsh Government also includes within the definition of investments all such assets held partially or wholly for financial return.
- 6.3 At the balance sheet date of 31st March 2022, the Council also held £52.1m of investments in directly owned property, loans to homeowners and local bodies and investments in a trading subsidiary. There has been no significant change from 31st March 2022.
- 6.4 These investments are budgeted to generate £2.75m of investment income for the Council after taking account of direct costs. This income is over a number of properties which provide varying rates of return.

7. FINANCIAL IMPLICATIONS – COMPLIANCE REPORT

- 7.1 The Chief Finance Officer reports that all treasury management activities undertaken during the quarter complied fully with the CIPFA Code of Practice and the Councils approved Treasury Management Strategy, compliance with specific investment limits is demonstrated in table 6 below.
- 7.2 Compliance with the authorised limit and operational boundary for external debt is demonstrated in table 6 below.

Table 6: Debt Limits	2022/23 Maximum	30.9.22 Actual	2022/23 Operational Boundary	2022/23 Authorised Limit	Complied? Yes/No
Borrowing	£135.582	£100.535	£192.00	£197.000	Yes
Long term liabilities, PFI and Finance Leases	(£0.670)	(£0.536)	£2.000	£2.000	Yes
Total debt	£134.912	£99.865	£194.000	£199.000	Yes

'Maximum' is the highest actual outstanding borrowing at any point during the first six months of 2022/23

- 7.3 The authorised limit for external debt represents a control on the maximum level of borrowing. This represents a limit beyond which external debt is prohibited, and this limit is set by the Council as part of the annual treasury management strategy. It reflects the level of external debt which, while not desired, could be afforded in the short term, but is not sustainable in the long term. The operational boundary is the limit beyond which external debt is not normally expected to exceed. In most cases this would be similar to the CFR but may be lower or higher depending on the levels of actual debt.
- 7.4 Since the operational boundary is a management tool for in-year monitoring it is not significant if the operational boundary is breached on occasions due to variations in cash flow, and this is not counted as a compliance failure.

Table 7: Investment Limits	2022/23 April-Sept Maximum £m	30.9.22 Actual £m	2022/23 Limit £m	Complied? Yes/No
Any single organisation, except the UK Government	£0.945m	£0.035m	£1.6m each	No
Any group of pooled funds under the same management	£6.000m	£2.330m	£8m per manager	Yes
UK Central Government	£25.355m	£1.340m	Unlimited	Yes

UK Central Government Local Authorities	£9.000m	£9.000m	£3m per LA (2 years)	Yes
Money Market Funds	£25m	£11.690m	£5m per fund - unlimited	Yes

7.5 There was a breach on 19th April when the operational bank account was overdrawn by £4.456m this was due to a processing error; a future chap's payment was set up and authorised at the bank for the incorrect date and there were insufficient funds in the account resulting in the account being overdrawn. No bank charges were incurred, and the funds were returned the next day.

7.6 At the beginning of October the operational bank account had excess funds of £1.694m (4/10/22) this was a processing error as the incorrect Council bank account was selected to move funds, and £2.009m (5/10/22) this was a result of the banking transaction not being authorised/released.

8 TREASURY MANAGEMENT INDICATORS

8.1 The Council measures and manages its exposures to treasury management risks using the following indicators.

8.2 **Security:** The Council has adopted a voluntary measure of its exposure to credit risk by monitoring the value-weighted average (credit rating/ credit score) of its investment portfolio. This is calculated by applying a score to each investment (AAA=1, AA+=2, etc.) and taking the arithmetic average, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk.

Security	30.9.22 Actual	2022/23 Target	Complied?
Portfolio average credit rating	A+	A	Yes

8.3 **Liquidity:** The Council has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount of cash available to meet unexpected payments it can borrow each quarter without giving prior notice.

Liquidity	30.9.22 Actual	2022/23 Target	Complied?
Liquid short-term deposits	£14.065m	£12m	Yes

8.4 **Interest Rate Exposures:** This indicator is set to control the Councils exposure to interest rate risk. The upper limits on the one-year revenue impact of a 1% rise or fall in interests was:

Interest rate risk indicator	30.9.22 Actual	2022/23 Limit	Complied?
Upper limit on one-year revenue impact of a 1% rise in interest rates	£48	£148	Yes
Upper limit on one-year revenue impact of a 1% fall in interest rates	(£61)	(£264)	Yes

8.5 The impact of a change in interest rates is calculated on the assumption that maturing loans and investment will be replaced at current rates.

8.6 **Maturity Structure of Borrowing:** This indicator is set to control the Councils exposure to refinancing risk. The upper and lower limits on the maturity structure of all borrowing were:

Maturity Structure of Borrowing	30.9.22 Actual	Upper Limit	Lower Limit	Complied?
Under 12 months	29%	50%	0%	Yes
12 months and within 24 months	0%	50%	0%	Yes
24 months and within 5 years	3%	60%	0%	Yes
5 years and within 10 years	4%	80%	0%	Yes
10 years and above	71%	100%	0%	Yes

8.7 Time periods start on the first day of each financial year. The maturity date of borrowing is the earliest date on which the lender can demand repayment.

8.8 Principal Sums Invested for Periods Longer than a year: The purpose of this indicator is to control the Councils exposure to the risk of incurring losses by seeking early repayment of its investments. The limits on the long-term principal sum invested to final maturities beyond the period end were:

Principal Sums Invested for Periods Longer than a year	2022/23	2023/24	2024/25
Actual principal invested beyond year end	£10m	£7m	£7m
Limit on principal invested beyond year end	£10m	£10m	£10m
Complied?	Yes	Yes	Yes

9 NATIONAL CONTEXT AND ECONOMIC COMMENTARY

9.1 Economic background: The ongoing conflict in Ukraine has continued to put pressure on global inflation and the economic outlook for UK and world growth remains weak. The UK political situation towards the end of the period following the ‘fiscal event’ increased uncertainty further.

9.2 The economic backdrop during the April to September period continued to be characterised by high oil, gas and commodity prices, ongoing high inflation and its impact on consumers’ cost of living, no imminent end in sight to the Russia-Ukraine hostilities and its associated impact on the supply chain, and China’s zero-Covid policy.

9.3 Central Bank rhetoric and action remained robust. The Bank of England, Federal Reserve and the European Central Bank all pushed up interest rates over the period and committed to fighting inflation, even when the consequences were in all likelihood recessions in those regions.

9.4 UK inflation remained extremely high. Annual headline CPI hit 10.1% in July, the highest rate for 40 years, before falling modestly to 9.9% in August. RPI registered 12.3% in both July and August. The energy regulator, Ofgem, increased the energy price cap by 54% in April, while a further increase in the cap from October, which would have seen households with average energy consumption pay over £3,500 per annum, was dampened by the UK government stepping in to provide around £150 billion of support to limit bills to £2,500 annually until 2024.

9.5 The labour market remained tight through the period but there was some evidence of easing demand and falling supply. The unemployment rate 3m/year for April fell to 3.8% and declined further to 3.6% in July. Although now back below pre-pandemic levels, the recent decline was driven by an increase in inactivity rather than demand for labour. Pay growth in July was 5.5% for total pay (including bonuses) and 5.2% for regular pay. Once adjusted for inflation, however, growth in total pay was -2.6% and -2.8% for regular pay.

- 9.6** With disposable income squeezed and higher energy bills still to come, consumer confidence fell to a record low of –44 in August, down –41 in the previous month. Quarterly GDP fell -0.1% in the April-June quarter driven by a decline in services output, but slightly better than the 0.3% fall expected by the Bank of England.
- 9.7** The Bank of England increased the official Bank Rate to 2.25% over the period. From 0.75% in March, the Monetary Policy Committee (MPC) pushed through rises of 0.25% in each of the following two MPC meetings, before hiking by 0.50% in August and again in September. August's rise was voted by a majority of 8-1, with one MPC member preferring a more modest rise of 0.25%. the September vote was 5-4, with five votes for an 0.5% increase, three for an 0.75% increase and one for an 0.25% increase. The Committee noted that domestic inflationary pressures are expected to remain strong and so given ongoing strong rhetoric around tackling inflation further Bank Rate rises should be expected.
- 9.8** On 23rd September the UK government, following a change of leadership, announced a raft of measures in a 'mini budget', loosening fiscal policy with a view to boosting the UK's trend growth rate to 2.5%. With little detail on how government borrowing would be returned to a sustainable path, financial markets reacted negatively. Gilt yields rose dramatically by between 0.7% - 1% for all maturities with the rise most pronounced for shorter dated gilts. The swift rise in gilt yields left pension funds vulnerable, as it led to margin calls on their interest rate swaps and risked triggering large scale redemptions of assets across their portfolios to meet these demands. It became necessary for the Bank of England to intervene to preserve market stability through the purchase of long-dated gilts, albeit as a temporary measure, which has had the desired effect with 50-year gilt yields falling over 100bps in a single day.
- 9.9** Bank of England policymakers noted that any resulting inflationary impact of increased demand would be met with monetary tightening, raising the prospect of much higher Bank Rate and consequential negative impacts on the housing market.
- 9.10** After hitting 9.1% in June, annual US inflation eased in July and August to 8.5% and 8.3% respectively. The Federal Reserve continued its fight against inflation over the period with a 0.5% hike in May followed by three increases of 0.75% in June, July and September, taking policy rates to a range of 3% - 3.25%.
- 9.11** Eurozone CPI inflation reached 9.1% y/y in August, with energy prices the main contributor but also strong upward pressure from food prices. Inflation has increased steadily since April from 7.4%. In July the European Central Bank increased interest rates for the first time since 2011, pushing its deposit rate from –0.5% to 0% and its main refinancing rate from 0.0% to 0.5%. This was followed in September by further hikes of 0.75% to both policy rates, taking the deposit rate to 0.75% and refinancing rate to 1.25%.
- 9.12** Financial markets: Uncertainty remained in control of financial market sentiment and bond yields remained volatile, continuing their general upward trend as concern over higher inflation and higher interest rates continued to dominate. Towards the end of September, volatility in financial markets was significantly exacerbated by the UK government's fiscal plans, leading to an acceleration in the rate of the rise in gilt yields and decline in the value of sterling.
- 9.13** Due to pressure on pension funds, the Bank of England announced a direct intervention in the gilt market to increase liquidity and reduce yields.
- 9.14** Over the period the 5-year UK benchmark gilt yield rose from 1.41% to 4.40%, the 10-year gilt yield rose from 1.61% to 4.15%, the 20-year yield from 1.82% to 4.13% and the 50-year yield from 1.56% to 3.25%. The Sterling Overnight Rate (SONIA) averaged 1.22% over the period.

- 9.15** Credit review: In July Fitch revised the outlook on Standard Chartered from negative to stable as it expected profitability to improve thanks to the higher interest rate environment. Fitch also revised the outlook for Bank of Nova Scotia from negative to stable due to its robust business profile.
- 9.16** Also in July, Moody's revised the outlook on Bayerische Landesbank to positive and then in September S&P revised the GLA outlook to stable from negative as it expects the authority to remain resilient despite pressures from a weaker macroeconomic outlook coupled with higher inflation and interest rates.
- 9.17** Having completed its full review of its credit advice on unsecured deposits at UK and non-UK banks, in May Arlingclose extended the maximum duration limit for five UK banks, four Canadian banks and four German banks to six months. The maximum duration for unsecured deposits with other UK and non-UK banks on Arlingclose's recommended list is 100 days. These recommendations were unchanged at the end of the period.
- 9.18** Arlingclose continued to monitor and assess credit default swap levels for signs of credit stress but made no changes to the counterparty list or recommended durations. Nevertheless, increased market volatility is expected to remain a feature, at least in the near term and, as ever, the institutions and durations on the Authority's counterparty list recommended by Arlingclose remains under constant review.
- 9.19** Arlingclose's Economic Outlook for the remainder of 2022/23 (based on 26th September 2022 interest rate forecast)

	Current	Dec-22	Mar-23	Jun-23	Sep-23	Dec-23	Mar-24	Jun-24	Sep-24	Dec-24	Mar-25	Jun-25	Sep-25
Official Bank Rate													
Upside risk	0.00	0.50	0.75	0.75	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Arlingclose Central Case	2.25	4.25	5.00	5.00	5.00	5.00	5.00	5.00	5.00	4.75	4.25	3.75	3.25
Downside risk	0.00	-1.00	-1.00	-0.75	-0.50	-0.50	-0.50	-0.75	-1.25	-1.50	-1.75	-1.75	-1.75

- 9.20** Arlingclose expects Bank Rate to rise further during 2022/23 to reach 5% by the end of the year.
- 9.21** The MPC is particularly concerned about the demand implications of fiscal loosening, the tight labour market, sterling weakness and the willingness of firms to raise prices and wages.
- 9.22** The MPC may therefore raise Bank Rate more quickly and to a higher level to dampen aggregate demand and reduce the risk of sustained higher inflation. Arlingclose now expects Bank Rate to peak at 5.0%, with 200bps of increases this calendar year.
- 9.23** This action by the MPC will slow the economy, necessitating cuts in Bank Rate later in 2024.
- 9.24** Gilt yields will face further upward pressure in the short term due to lower confidence in UK fiscal policy, higher inflation expectations and asset sales by the BoE. Given the recent sharp rises in gilt yields, the risks are now broadly balanced to either side. Over the longer term, gilt yields are forecast to fall slightly over the forecast period.
- 9.25** Background: Monetary policymakers are behind the curve having only raising rates by 50bps in September. This was before the "Mini-Budget", poorly received by the markets, triggered a rout in gilts with a huge spike in yields and a further fall in sterling. In a shift from recent trends, the focus now is perceived to be on supporting sterling whilst also focusing on subduing high inflation.

- 9.26** There is now an increased possibility of a special Bank of England MPC meeting to raise rates to support the currency. Followed by a more forceful stance over concerns on the looser fiscal outlook. The MPC is therefore likely to raise Bank Rate higher than would otherwise have been necessary given already declining demand. A prolonged economic downturn could ensue.
- 9.27** Uncertainty on the path of interest rates has increased dramatically due to the possible risk from unknowns which could include for instance another Conservative leadership contest, a general election, or further tax changes including implementing windfall taxes.
- 9.28** The government's blank cheque approach to energy price caps, combined with international energy markets priced in dollars, presents a fiscal mismatch that has contributed to significant decline in sterling and sharp rises in gilt yields which will feed through to consumers' loans and mortgages and business funding costs.
- 9.29** UK government policy has mitigated some of the expected rise in energy inflation for households and businesses flattening the peak for CPI, whilst extending the duration of elevated CPI. Continued currency weakness could add inflationary pressure.
- 9.30** The UK economy already appears to be in recession, with business activity and household spending falling. The short- to medium-term outlook for the UK economy is relatively bleak.
- 9.31** Global bond yields have jumped as investors focus on higher and stickier US policy rates. The rise in UK government bond yields has been sharper, due to both an apparent decline in investor confidence and a rise in interest rate expectations, following the UK government's shift to borrow to loosen fiscal policy. Gilt yields will remain higher unless the government's plans are perceived to be fiscally responsible.
- 9.32** The housing market impact of increases in the Base Rate could act as a "circuit breaker" which stops rates rising much beyond 5.0%, but this remains an uncertainty.

10 CONCLUSIONS

- 10.1** Overall, the Council remains in line with the Treasury Management Strategy as approved in February 2022. The treasury activities continue to be monitored on a daily basis.

11 BACKGROUND PAPERS

- 11.1** Treasury Management Strategy 2022/23
- 11.2** Treasury Management Outturn report 2021/22
- 11.3** 2022/23 cashflow, loan/investment register
- 11.4** Arlingclose updates and reports

Area for consideration	Comment
Monitoring Officer Consultation	
Section 151 Officer Consultation	
Existing Council Policies	See background papers
Financial Implications eg within existing budgets or funding identified	
Legal Implications (including human rights)	
Risk Implications	
Equality Issues/EQIA assessment (if EQIA not required explain why)	
Details contained in strategy	
Crime & Disorder	

Subject: Parish Grants Review Update

Report to: ELT - 29 November 2022
Policy and Resources Committee - 6 December 2022

Report by: Finance Director



SUBJECT MATTER/RECOMMENDATIONS

This report sets out the current levels of parish grants provided by the Council and makes recommendations for the level of grants for the 2023/24 financial year.

It is recommended that Policy and Resources Committee:

- 1) Note the level of financial support provided to parish councils;
- 2) Approve the removal of the Local Council Tax Support Grant of £25,003 for 2023/24;
- 3) Approve the removal of the concurrent function grants for bus shelters in 2023/24 of £8,714;
- 4) Agree to establishment of a small working group to review the Burial Grounds and Parks and Open Spaces element of the Concurrent Function Grants with no changes to these elements proposed for 2023/24, but to review in line with the criteria of grants as outlined in section 2.1 and 2.2 of the report for concurrent function grants.

1. Introduction and Background

- 1.1. As part of a previous budget approval it was agreed that a review of concurrent function grants should be carried out. As part of the review, all support to parishes has been included.
- 1.2. The setting of the annual council tax reflects the parish precepts as set by the Parish Councils. In order to inform the setting of the parish precepts, the parish councils should have regard to the level of concurrent function grants and therefore any change to this can be taken into account.
- 1.3. Parish Councils within the borough currently receive financial support from the Borough Council through a number of ways in the form of discretionary grants. At a time when the Council faces significant financial pressures, all areas of discretionary spend should be subject to review.
- 1.4. Parishes receive grants in the form of concurrent function grants and local council tax support grants. In addition, as reported to the Housing and Neighbourhoods committee in September 2022 from the Playground and Open Spaces Audit report the Council maintain a number of playground and open space areas across parished areas which fall outside of the concurrent grants and are funded by the Borough Council.

2. Current System – Concurrent Function Grants (CFG)

- 2.1. The criteria for concurrent functions are that they are services which can be carried out by the Borough Council but are also within the statutory remit of a parish council where these exist. These will cover services that are provided in some parts of the borough by the borough council and in others part of the borough by a parish council. Where this occurs parish

taxpayers may be charged twice, for example within the parish charge and the borough council charge.

- 2.2. The services are discretionary in nature to whoever carries out the function. To avoid 'double taxation' (where a service which could be provided by either the Borough Council or a parish council is financed from the parish precept in a parished area and by the Borough Council in non-parished areas with no corresponding reduction in Council Tax for the parished areas) the Borough Council provides a scheme of whereby a grant is provided to parish/town councils in the borough for use by these councils against concurrent function expenditure.
- 2.3. Concurrent grants are paid to 19 of the 21 parishes in the borough and total £142,313 for 2022/23. Appendix A provides a breakdown of the parish grants for 2022/23 for each of the parishes for each of the following functions:
 - 2.3.1. Burial Grounds £34,074
 - 2.3.2. Beach Cleaning £9,240
 - 2.3.3. Parks and Open Spaces £90,285
 - 2.3.4. Bus Shelters £8,714
- 2.4. The cost of the grants of £142,313 is a cost the general fund budget and across the tax base equates to an average band D charge of £4.85 per annum to all parished and non parished areas. The level of grants paid are historic in nature.
- 2.5. When asked previously to confirm the actual amount Parish Councils use of the grants towards the function and whether the function covers the full cost of the service, the responses in the whole suggested that the grants covered the costs or at least contributed to the costs. Some detail was previously provided detailing the areas of spend under each of the categories. Supporting evidence of the payments has not been requested at this stage, although this could be requested as part of a further review but would require additional resources to be allocated to gather the information to inform further review.
- 2.6. Funding for parishes can come from other sources in addition to precepts and grants, for example chargeable fees. Without full access to the parish budgets, the proportion of spend that is funded by concurrent function grants is not known, depending on the functions funded, this will vary. For example, Caister set a precept of £136,013 in 2022/23 and received a grant of £2,550 (2% of the precept amount), in comparison, Thurne set a precept of £1,120 and received a grant of £1,440 (129% of the precept amount). Appendix B provides the details of the precepts for 2022/23 along with the tax base (and band D) and grants for the 2022/23 year.

3. Play Areas

- 3.1. As mentioned in the previous report to Housing and Neighbourhoods Committee, the Council provide the maintenance of a number of parks and open spaces including playgrounds. These fall outside of the concurrent function grants and maintained by the borough council i.e., for the replacement of equipment. Of the 19 receivers of CFG, 14 play areas (under the ownership of the parish) are maintained by the borough council with no recharges to the parish.
- 3.2. There is clearly inequity in the current system of grant awards and support for concurrent functions.

4. Local Council Tax Support Grant

- 4.1. Concurrent Functions grant is not the only grant the Council provides to the parish councils. The Council also provides a Local Council Tax Support (LCTS) grant to each of the parishes. The grant compensates for the loss of council tax income from those properties in receipt of Local Council Tax Support and was introduced when the LCTS scheme was introduced and originally funded from central government grant, which the Council passed down to Parish Councils. The grant from

central government has now ended, as such the Council now funds the LCTS grant to parishes from its own locally raised budget e.g. council tax and retained business rates.

- 4.2. The Council has continued to pass on the grant to the parishes with small annual reductions with the funding allocated to parishes totalling £25,003 for 2022/23 for LCTS, this equates to an average band d charge of £1.52 for a parish charge.
- 4.3. As the Council is no longer funded for the parish element of LCTS and as a precepting authority it is fair that the parish fund the impact of LCTS and therefore it is recommended that the LCTS support grant is passed down to the parish councils from 2023/24 onwards.

5. Proposals

- 5.1. The funding to the parishes through discretionary grants should be subject to review, taking into account that increases to council tax for the billing authority are capped. Options available for the future provision of support for parishes are outlined below, this has been separated between recommendations for the Local Council Tax Support and those for the Concurrent Function Grants.
- 5.2. LCTS Grants – Two options are available for these grants, to continue or to end. Continuing with the grants means that the parishes continue to be protected from the impact of the LCTS scheme which has now been in operation for 10 years. As a precepting body, the parishes like the borough are faced with risks around the impact on the tax base of changes in the demand for discounts. As the funding is no longer allocated to the Borough Council it is recommended that the LCTS grant is removed from 2023/24.
- 5.3. Concurrent Function Grants – Any changes to the allocations of CFGs for the future financial years could even with notice have an impact on the budget/precepting process for the parishes. Early notice of these even for 2024/25 can provide time for the parishes to take informed decisions in setting the precepts for the coming financial year for 2023/24. Any proposals for changes would be phased over a number of budget cycles to allow transition.
- 5.4. The proposals for change are set out below:
- 5.5. **Beach Cleaning** – It is recommended that these continue as there will be beach cleaning in the non parished areas for comparison.
- 5.6. **Burial Grounds** – Further review of these areas are required including arrangements for closed churchyards and maintenance of any that fall to the responsibility of the Borough Council in the non parished areas.
- 5.7. **Bus Shelters** – These are provided to seven parishes only and is recommended that these are removed from 2023/24 as no provision is made for maintenance of these in non parished areas.
- 5.8. **Parks and Open Spaces** – As the most significant area of CFG spend of £90,285 this needs further review and understanding of the responsibility for the functions that are funded by the CFG. As flagged in the Playground and Open Space Audit completed earlier this year there are play areas within Parish areas which are maintained by the Borough Council with no recharges made, therefore an inequity in provision. Of the 18 parishes currently receiving a CFG for Parks and Open Spaces 14 have playground provisions where the Council are providing some level of maintenance, duplication of support. Those not maintained are Hopton, Mautby, Orm St Michael and Winterton.
- 5.9. Special Expenses – The Local Government Finance Act 1992 allows for different amounts of Council Tax to be calculated for different areas i.e., parished and non parished areas, of a borough, depending on whether any, special items relate to those parts. A special item is an item (service)

which relates only to part of the district council's area. The areas of Gorleston and Great Yarmouth are unparished and make up 44% (12,876) of the tax base (of the 2022/23 taxbase total of 29,344).

5.10. Any special expense that is charged forms part of the Councils council tax bill and is included within the referendum limits, ie within the 3% for 2023/24. For example, subject to the referendum limits for 2023/24 which would allow a maximum increase to a band D of £5.28, the introduction of a special expense of £1 would mean that the Borough Council's Band D charge could only increase by £4.28, with the £4.28 being chargeable over the total tax base and £5.28 (£4.28 plus £1 special expense) being chargeable over the non parished areas. This would result in a small reduction in the amount of council tax collected, however as there is an increase in tax base growth in the un parished areas, the introduction of special expenses provides an opportunity to provide greater equity in the funding of costs in the unparished areas.

5.11. To inform the introduction of special expenses, the items to be charged for would need to be considered, for example these may be different between Great Yarmouth and Gorleston depending on service provision. Equally the administration of the special expenses would need to be taken into account. These should all be considered as part of the wider review on the parks and open spaces element of the CFG to come forward in 2023/24.

6. Financial and Risk Implications

6.1. As the Council continues to face budgetary challenges, it must look at all spending areas to identify efficiencies and savings.

6.2. Under the operating arrangements of the collection fund, shortfalls in the collection of council tax in respect of the parishes will fall to the billing authority. Unlike the major preceptors (Police and Norfolk County Council) who each cover their respective shares of shortfall in collection, the billing authority is required to cover both parish and billing element thereby protecting the parishes.

Area for consideration	Comment
Monitoring Officer Consultation	
Section 151 Officer Consultation	
Existing Council Policies	See background papers
Financial Implications eg within existing budgets or funding identified	
Legal Implications (including human rights)	
Risk Implications	
Equality Issues/EQIA assessment (if EQIA not required explain why)	
Details contained in strategy	
Crime & Disorder	
Every Child Matters	

Parish	Local Council Tax Support	2022/23 Concurrent Function Grant				TOTAL
		Burial Grounds	Beach Cleaning	Parks & Open Spaces	Bus Shelters	
Ashby Parish Council	£0	£0	£0	£0	£0	£0
Belton with Browston Parish Council	£2,672	£0	£0	£12,950	£0	£12,950
Bradwell Parish Council	£2,933	£1,215	£0	£14,180	£1,015	£16,410
Burgh Castle Parish Council	£420	£1,050	£0	£1,550	£0	£2,600
Caister Parish Council	£6,887	£0	£0	£2,550	£0	£2,550
Filby Parish Council	£143	£1,450	£0	£3,400	£150	£5,000
Fleggburgh Parish Council	£259	£2,300	£0	£1,240	£0	£3,540
Fritton Parish Council	£105	£550	£0	£0	£0	£550
Hemsby Parish Council	£1,011	£5,800	£5,000	£9,750	£5,899	£26,449
Hopton Parish Council	£1,828	£1,000	£0	£500	£0	£1,500
Martham Parish Council	£3,410	£3,800	£0	£11,400	£200	£15,400
Mautby Parish Council	£67	£2,187	£0	£1,250	£0	£3,437
Orm St Margaret Parish Council	£2,833	£7,500	£3,000	£15,000	£0	£25,500
Orm St Michael Parish Council	£70	£850	£0	£3,000	£0	£3,850
Repps-with-Bastwick Parish Council	£284	£0	£0	£4,411	£0	£4,411
Rollesby Parish Council	£341	£1,300	£0	£1,900	£200	£3,400
Somerton Parish Council	£21	£760	£0	£1,025	£250	£2,035
Stokesby Parish Council	£176	£812	£0	£1,919	£0	£2,731
Thurne Parish Council	£45	£900	£0	£540	£0	£1,440
West Caister Parish Council	£0	£0	£0	£0	£0	£0
Winterton Parish Council	£1,498	£2,600	£1,240	£3,720	£1,000	£8,560
	£25,003	£34,074	£9,240	£90,285	£8,714	£142,313

Appendix B

Parish	2022/23 Tax Base	Parish Precept 2022/23	BAND D (Per Annum) Precept	Burial Grounds	Beach Cleaning	Parks & Open Spaces	Bus Shelters	TOTAL CFG	CFG as % of Precept
Ashby Parish Council	23	£0		£0	£0	£0	£0	£0	
Belton with Browston Parish Council	1,128	£44,797	£39.71	£0	£0	£12,950	£0	£12,950	29%
Bradwell Parish Council	3,836	£51,142	£13.33	£1,215	£0	£14,180	£1,015	£16,410	32%
Burgh Castle Parish Council	452	£10,506	£23.24	£1,050	£0	£1,550	£0	£2,600	25%
Caister Parish Council	2,814	£136,013	£48.33	£0	£0	£2,550	£0	£2,550	2%
Filby Parish Council	342	£10,857	£31.75	£1,450	£0	£3,400	£150	£5,000	46%
Fleggburgh Parish Council	408	£7,320	£17.94	£2,300	£0	£1,240	£0	£3,540	48%
Fritton Parish Council	261	£7,685	£29.44	£550	£0	£0	£0	£550	7%
Hemsby Parish Council	1,461	£91,048	£62.32	£5,800	£5,000	£9,750	£5,899	£26,449	29%
Hopton Parish Council	1,068	£30,131	£28.21	£1,000	£0	£500	£0	£1,500	5%
Martham Parish Council	1,239	£59,869	£48.32	£3,800	£0	£11,400	£200	£15,400	26%
Mautby Parish Council	143	£4,143	£28.97	£2,187	£0	£1,250	£0	£3,437	83%
Orm St Margaret Parish Council	1,734	£75,285	£43.42	£7,500	£3,000	£15,000	£0	£25,500	34%
Orm St Michael Parish Council	115	£4,915	£42.74	£850	£0	£3,000	£0	£3,850	78%
Repps-with-Bastwick Parish Council	155	£6,149	£39.67	£0	£0	£4,411	£0	£4,411	72%
Rollesby Parish Council	351	£10,000	£28.49	£1,300	£0	£1,900	£200	£3,400	34%
Somerton Parish Council	114	£2,086	£18.30	£760	£0	£1,025	£250	£2,035	98%
Stokesby Parish Council	119	£5,447	£45.77	£812	£0	£1,919	£0	£2,731	50%
Thurne Parish Council	52	£1,120	£21.54	£900	£0	£540	£0	£1,440	129%
West Caister Parish Council	74	£0	£0.00	£0	£0	£0	£0	£0	n/a
Winterton Parish Council	579	£37,517	£64.80	£2,600	£1,240	£3,720	£1,000	£8,560	23%
	16,468	£596,030		£34,074	£9,240	£90,285	£8,714	£142,313	
GY and Gorleston	12,876								
	29,344								

