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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 addressing 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 Ac 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



October2022



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EAST SUFFOLK
COUNCIL



CONTENTS

INTRODUCTION	1
2 CONTEXT: HOMES, BUSINESSES, COMMUNITIES, AND ENVIRONMENT AFFECTED BY COASTAL CHANGE	4
What are the coastal processes and geology affecting the coast?	4
What are the economic, social, and environmental benefits enjoyed along the coast and how are they affected by coastal processes?.....	4
How is and will climate change affect the coast?	6
2 COASTAL MANAGEMENT MEASURES AND POLICIES.....	7
Introduction	7
National Policy and Guidance	8
Local Policy.....	9
Local Plan policies.....	12
3 DEVELOPMENT IN THE COASTAL CHANGE MANAGEMENT AREA	14
Introduction	14
What types of development can be appropriate in a CCMA	15
Coastal Erosion Vulnerability Assessment (CEVA).....	22
4 ROLBACK AND RELOCATION	26
Introduction	26
Residential land-uses affected by coastal erosion	27
Commercial, community, business, infrastructure and agricultural uses affected by coastal erosion	29
Habitats affected by coastal erosion	31
Remediation, demolition and treatment of existing sites and their uses	31
Acquisition of land for relocation and rollback	32
5 'ENABLING' DEVELOPMENT.....	33
Introduction	33
What is 'enabling' development?.....	33
Enabling development and coastal adaptation/rollback.....	33
Example scenarios for enabling development.....	34
Public benefit(s).....	34
Enabling development to implement coastal risk management structures.....	36

Lifespan of the proposed development.....	36
Viability and enabling development.....	36
Enabling development and legal agreements.....	37
Key considerations	37
APPENDIX 1 – NORFOLK AND SUFFOLK COASTAL AUTHORITIES STATEMENT OF COMMON GROUND COASTAL ZONE PLANNING (SEPTEMBER 2018)	39
APPENDIX 2 – ORGANISATION ROLES & RESPONSIBILITIES.....	44
APPENDIX 3 – COASTAL EROSION VULNERABILITY ASSESSMENT (CEVA) TEMPLATE.....	47
APPENDIX 4 – CASE STUDIES	51
APPENDIX 5 – EXAMPLE MODEL CONDITIONS	75
APPENDIX 6 – NEIGHBOURHOOD PLAN GUIDANCE.....	77
APPENDIX 7 – GLOSSARY	79

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

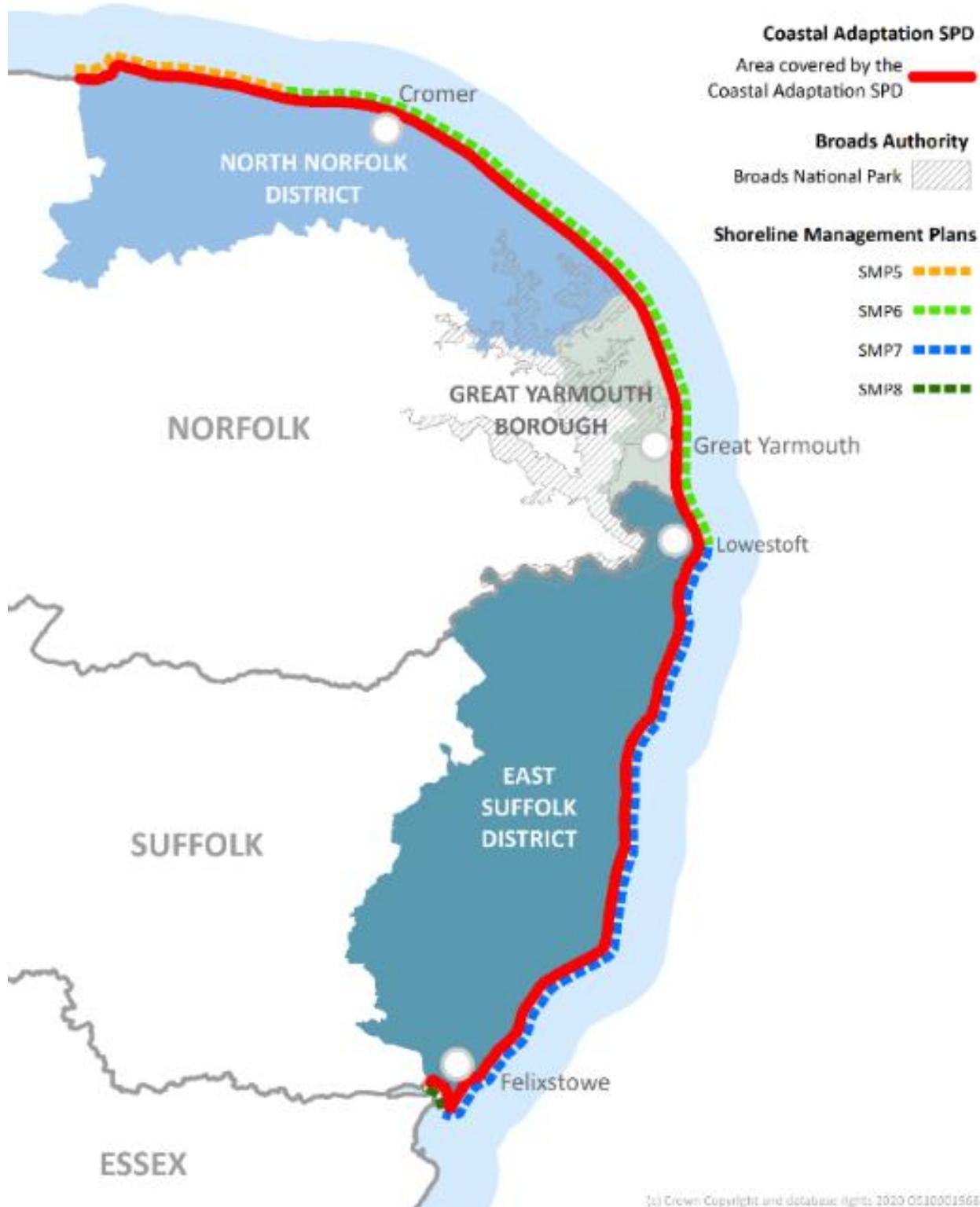


Figure 1 - The area to which the SPD applies

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/1005759/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 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. 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 CCMAs.

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 CCMAs. 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 CCMAs. 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 CCMAs, 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 ROLBACK 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 \(engagementhq.com\)](https://engageenvironmentagency.uk.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 be 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	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.
		Risk Management Authority	
		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:	<ul style="list-style-type: none">• 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:	<p>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.</p> <p>The scheme includes public walking and cycle ways and provision of parking for the church and green spaces with landscaping.</p> <p>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.</p>



Lessons Learned:	<p>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.</p> <ul style="list-style-type: none">• 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
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Beach Road Car Park and Ramp, replacement Hapdisburgh, Norfolk

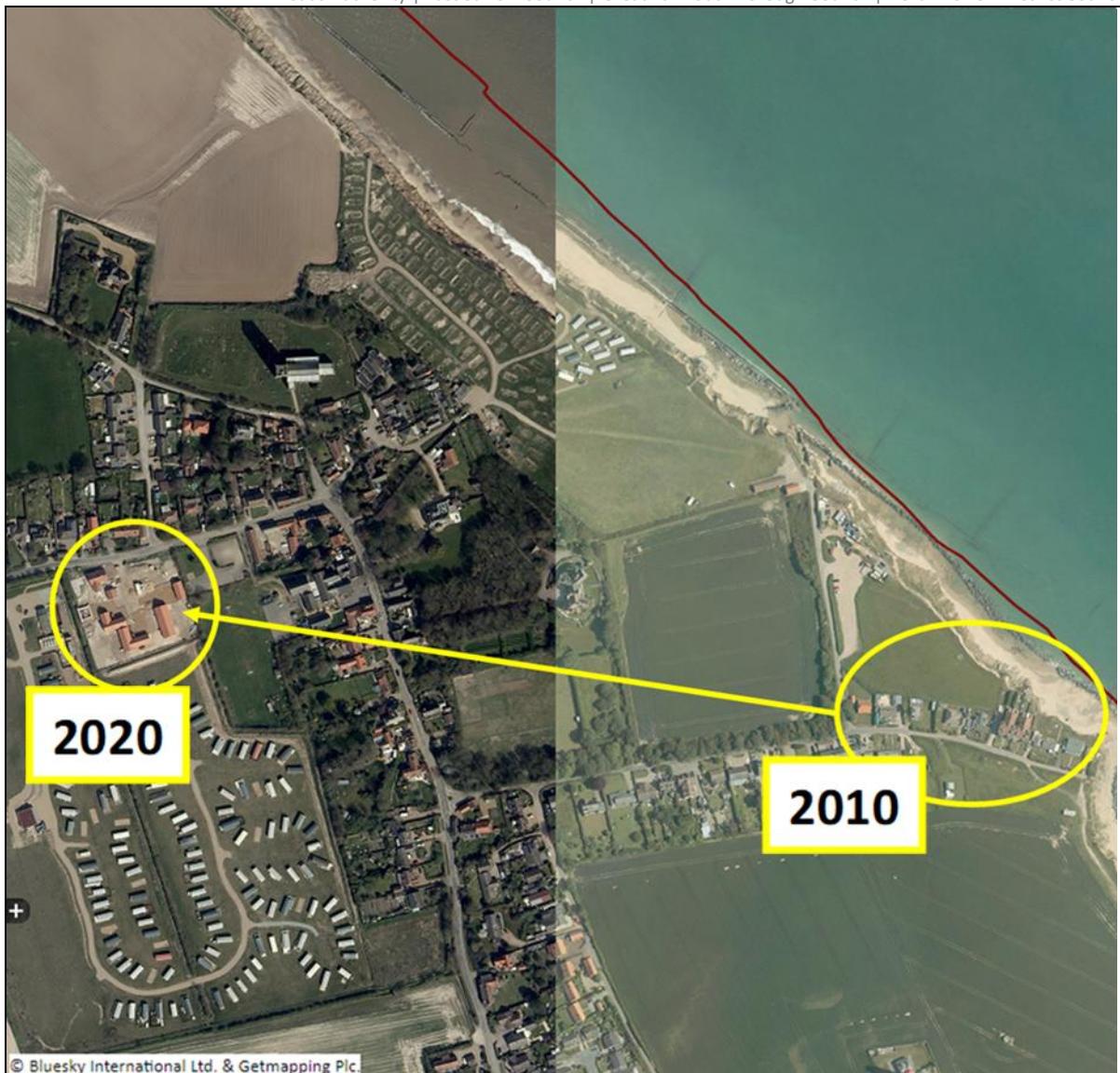
Planning Number:	PF/11/0169	Link to application:	https://idoxpa.north-norfolk.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=ZZZT68LNMS935
Authority:	North Norfolk District Council	Applicant:	North Norfolk District Council
Date of Application: Date of Permission:	2011 2011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



Key Details:	<ul style="list-style-type: none">Community car park and Beach Access RampDesigned to be rolled back as cliff erodesRamp cut into cliff, no permanent materials usedCar 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

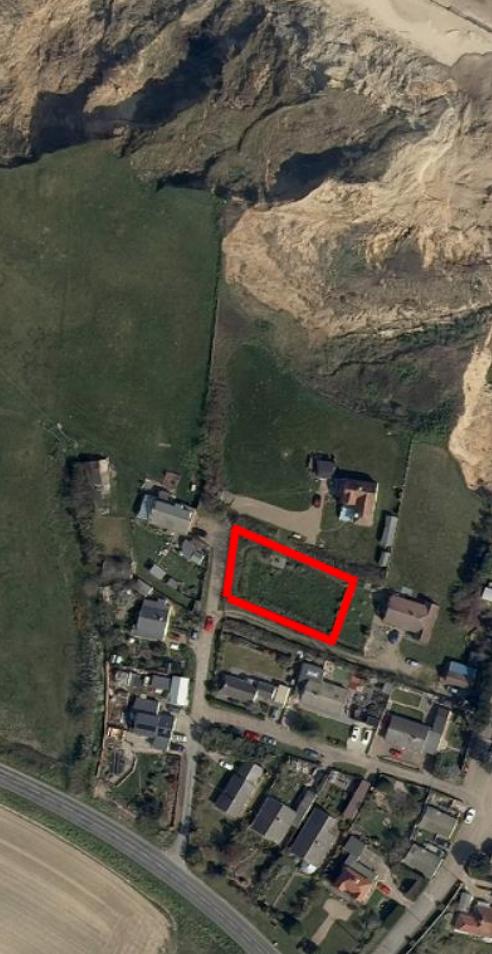
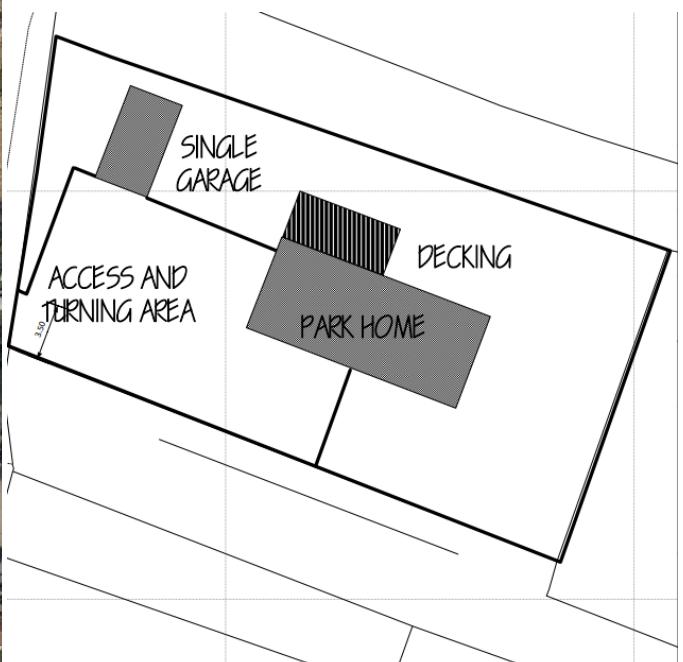
Planning Number:	PM/16/0428	Link:	https://idoxpa.north-norfolk.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=ZZZT68LNMS298
Authority:	North Norfolk District Council	Applicant:	North Norfolk District Council
Date of Application:	2016	Keywords:	Rollback, EN12, Relocation, Residential, etc



Key Details:	<ul style="list-style-type: none"> 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:	<p>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</p>

	<p>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.</p>
Lessons Learned:	<ul style="list-style-type: none">• 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:	<ul style="list-style-type: none">Site expected to be lost to erosion in 2025-2055 epoch (epoch 2)Applicant had historic permission to build an additional bricks-and-mortar houseInstead, applied to place a caravan and garage on the siteThis 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:	<ul style="list-style-type: none">Loss of residentialRollback allocation for redevelopment created in Reydon
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Details:	<ul style="list-style-type: none">• 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	<ul style="list-style-type: none">• 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:	<ul style="list-style-type: none">Some properties at Easton Bavents had been lost to erosion, and others were/are under threatA 220-dwelling allocation (Policy WLP6.1) was made in the Waveney Local Plan for a site in ReydonSeven plots are made available for the relocation of properties under threat (or already lost) from coastal erosion
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Details:	<ul style="list-style-type: none">• 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 S106 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	<ul style="list-style-type: none">• 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:	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:	2021	Keywords:	Adaptation, Epoch 2, Hotel



Key Details:	<ul style="list-style-type: none"> 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=R739MZLN03000&activeTab=summary
Authority:	North Norfolk District Council	Applicant:	Wood Hill Holiday Park
Date of Application:	2022	Keywords:	Rollback, EN12, Enabling Development



Key Details:	<ul style="list-style-type: none"> 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

	<p>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</p> <p>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.</p> <p>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.</p> <p>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.</p>
Lessons learned	<ul style="list-style-type: none">• 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:	<p>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.</p>
Key Learning:	<ul style="list-style-type: none"> - 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:	<ul style="list-style-type: none">- 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

	<p>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'.</p> <p>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.</p> <p>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.</p>
Lessons Learned:	<ul style="list-style-type: none">- 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



Contents

Introduction	3
Who was consulted?.....	4
How were they consulted?	4
What were the main issues raised during the initial consultation?.....	5
Appendix 1: Initial consultation social media posts	7
Appendix 2: Consultation bodies	8
Appendix 3: Initial consultation responses	10

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



East Suffolk Council Planning @eastsuffolkplan ...

Initial consultation on the Coastal Adaptation Supplementary Planning Document ends Friday 16 October. Please let us know your views east suffolk.inconsult.uk/consult.ti/coa...

17:33 · 08/10/2020 · Twitter Web App

Reply Retweet Like Share

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 been 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)	<p>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.</p> <p>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</p>	<p>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.</p> <p>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</p> <p>The SPD will present case studies of coastal adaptation best practice. It is not considered</p>	<p>The SPD sets out the benefits of roll back schemes against the impacts.</p> <p>Appropriate pre-application engagement should be undertaken, but the Local Plans already mention this</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>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.</p> <p>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.</p>	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.	<p>The SPD will within its context chapter, set out the affects that coastal processes and policies can have on the natural environment.</p> <p>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.</p>	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:	<ul style="list-style-type: none"> • water and water recycling infrastructure <p>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.</p>	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>provided by Anglian Water and • existing infrastructure including ports within the area and energy generation</p>		
Barton Willmore (Will Spencer)	<p>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:</p> <ul style="list-style-type: none"> • 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. <p>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</p>	<p>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.</p>	<p>No change.</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>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.</p>		
Bidwells (Kate Hammond)	<p>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.</p>	<p>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.</p>	No change.
RSPB (Ian Robinson)	<p>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.</p> <p>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</p>	<p>The SPD will within its context chapter, set out the affects that coastal processes and policies can have on the natural environment.</p> <p>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.</p>	<p>The SPD sets out the impacts of coastal processes and planning policies on the natural environment.</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>National Planning Policy Framework (NPPF) e.g. paras 118, 157.</p> <p>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.</p> <p>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.</p>		

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)	<p>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:</p> <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> • 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. 	<p>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.</p>	<p>The SPD will contain a glossary of key terms.</p>
J E Blanchflower	<p>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</p>	<p>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</p>	<p>No change.</p>

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 be 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 arguments 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)	<p>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.</p>	<p>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.</p>	Ensure that appropriate consideration is given to caravan and camping parks
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	<p>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.</p>	<p>The SPD will not create new or amend existing planning policies as this is the role of the Development Plan and National Policy.</p>	No change.
Felixstowe Town Council (Ash Tadjirishi)	<p>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.</p>	<p>The SPD will provide guidance relating to the implementation of coastal planning policies, and to other guidance where relevant to the</p>	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)	<p>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.</p>	<p>The Councils will ensure that the IDBs are being consulted on relevant applications</p> <p>The SPD will provide guidance in relation to which, and when, organisations should be consulted on development proposals under consideration by coastal planning policies.</p> <p>The SPD cannot not alter the CCMA as this is the role of Local Plans and SMPs.</p>	<p>Provide guidance relating to which, and when, organisations should be consulted on development proposals under consideration by coastal planning policies.</p>
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 Beevor)	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 interested 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)	<p>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.</p>	<p>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).</p> <p>The SPD will provide guidance relating to the implementation of coastal planning policies.</p>	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 tern 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
		<p>unless such proposals overlap with the terrestrial planning regime.</p> <p>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.</p>	
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)	<p>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.</p>	<p>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).</p>	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, Compulsory 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 Tadjrishii)	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 Tadjrishii)	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)	<p>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:</p> <ul style="list-style-type: none"> •• 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. NFWOF 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. NFWOF 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)	<p>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.</p>	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	<p>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.</p>	<p>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</p>	<p>Technical language has been used sparingly throughout the draft SPD, and a glossary has been provided to help explain technical terms.</p>

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 PEOLE 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 planned 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 Costal 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)	<p>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.</p>	<p>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</p>	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	<p>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, Potterheath, 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.</p> <p>RECOMMENDATIONS</p> <p>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.</p>	<p>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.</p> <p>The SPD will, however, provide guidance relating to the implementation of coastal adaptation planning policies.</p>	No change.

Respondent	Comment	Partnership Response	Changes Made
The British Horse Society (Charlotte Ditchburn)	<p>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.</p> <p>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.</p> <p>2. COASTAL ADAPTATION SUPPLEMENTARY PLANNING DOCUMENT INITIAL CONSULTATION</p> <p>a. Are there any elements of National or Local Planning Policy which should be particularly emphasised/explained in the SPD? Yes</p> <p>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</p>	<p>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.</p> <p>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</p>	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>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 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</p>	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
	<p>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.</p>		
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
	<p>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.</p>	studies appended to the draft SPD.	
Nigel Doyle	<p>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.</p> <p>Attachment: https://eastsuffolk.inconsult.uk/gf2.ti/af/1172354/300644/PDF/-/final-chief-planning-officer-note-planning-for-coastal-change-march-2020.pdf</p>	<p>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.</p>	No change.

Respondent	Comment	Partnership Response	Changes Made
Norfolk Coast Partnership (Gemma Clark)	<p>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.</p>	<p>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.</p>	No change.
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	<p>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.</p>	<p>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.</p>	No change.

Respondent	Comment	Partnership Response	Changes Made
Felixstowe Town Council (Ash Tadjirishi)	<p>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.</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> 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 close for some unforeseen reason, including the eventuality that severe weather could impede access to the town for Norse / EA staff to close the gates. <p>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".</p>	<p>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 aide the implementation of coastal adaptation planning policies.</p> <p>The SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs).</p> <p>The draft SPD provides guidance relating to the implementation</p>	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
		<p>special qualities of environmental designations.</p> <p>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.</p>	
Lowestoft Cruising Club (David Bennett)	<p>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</p>	<p>The Partnership has considered these points, but considers in general that they relate more to flood risk than coastal erosion.</p> <p>The flood risk and planning situation</p>	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	<p>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</p>	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
		<p>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.</p> <p>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</p>	

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 Overy 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	<p>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.</p>	<p>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.</p> <p>Plan-led approaches helpful to relocation and rollback can be</p>	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
	<p>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.</p>	<p>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.</p>	
Historic England (Andrew Marsh)	<p>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:</p> <ul style="list-style-type: none"> • 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 	<p>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</p>	<p>The draft SPD recognises the importance of the historic environment along the coast and the important role that Historic England play in conserving the</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>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.</p> <ul style="list-style-type: none"> • 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. <p>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</p>	<p>to how the historic environment can be appropriately preserved and enhanced is best addressed in other guidance documents at a local and national level.</p>	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
	<p>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.</p> <p>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.</p> <p>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</p>	<p>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.</p>	

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	<p>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 degreasers 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</p>	<p>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.</p> <p>Questions about overall housing numbers and particular planning applications are matters beyond the scope of the SPD, as is offshore</p>	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>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 at 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 sams 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 if representation form and hope the secretary of states 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 yo 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</p>	<p>dredging. However, the SPD will provide guidance to help manage development and rollback/relocation in coastal areas.</p>	

Respondent	Comment	Partnership Response	Changes Made
	<p>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.</p>		
Richard Adams	<p>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?</p>	<p>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.</p>	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)	<p>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</p>	<p>The management approach to the coast (e.g. protect/hold the</p>	No change

Respondent	Comment	Partnership Response	Changes Made
	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

Respondent	Comment	Partnership Response	Changes Made
	<p>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.</p> <p>2. Allow operators to protect their properties from coastal erosion</p> <p>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.</p> <p>3. Promote "roll-back" and relocation</p> <p>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. 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</p>	<p>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.</p> <p>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</p>	

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	<p>less risk from coastal erosion either within or outside CCMAs 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.</p>	<p>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.</p>	
Michael Boon	<p>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</p>	<p>Shoreline Management Plans make the decisions on the management of the coast and cover wide areas (based largely on</p>	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>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</p>	<p>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.</p>	

Respondent	Comment	Partnership Response	Changes Made
	<p>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.</p> <p>4. Roll-back and Relocation Options</p> <p>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 are now dangerous to use and holiday villages which need a landward relocation owing to the vulnerability of cliffs.</p> <p>5. Delivery and Enabling Development</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>The various compartments 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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>In the past there has been too much piecemeal defence on vulnerable sections of the</p>		

Respondent	Comment	Partnership Response	Changes Made
	<p>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</p>		

Respondent	Comment	Partnership Response	Changes Made
	<p>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</p>		

Respondent	Comment	Partnership Response	Changes Made
	<p>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 Trimingham 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.</p>		
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

Respondent	Comment	Partnership Response	Changes Made
	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
	<p>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.</p>	<p>guidance documents.</p> <p>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.</p>	
North Norfolk District Council (Planning Policy Team)	<p>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.</p> <p>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.</p> <p>For NNDC, it is particularly important that the joint SPD should usefully address:</p> <ul style="list-style-type: none"> - 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; 	<p>Support noted.</p> <p>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</p>	No change

Respondent	Comment	Partnership Response	Changes Made
	<ul style="list-style-type: none"> - 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. 	<p>appendix that sets out the roles and responsibilities of organisations acting on the coast.</p> <p>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.</p> <p>The circumstances when temporary development would be appropriate within the CCMA and requirements relating to the preparation of a Coastal Erosion Vulnerability Assessment are</p>	

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



Contents

1. Introduction	2
2. Legislative Background.....	2
3. Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC	3
4. Assessment	4
5. Conclusion	7
Appendix 1: Responses from Statutory Consultees.....	9

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:

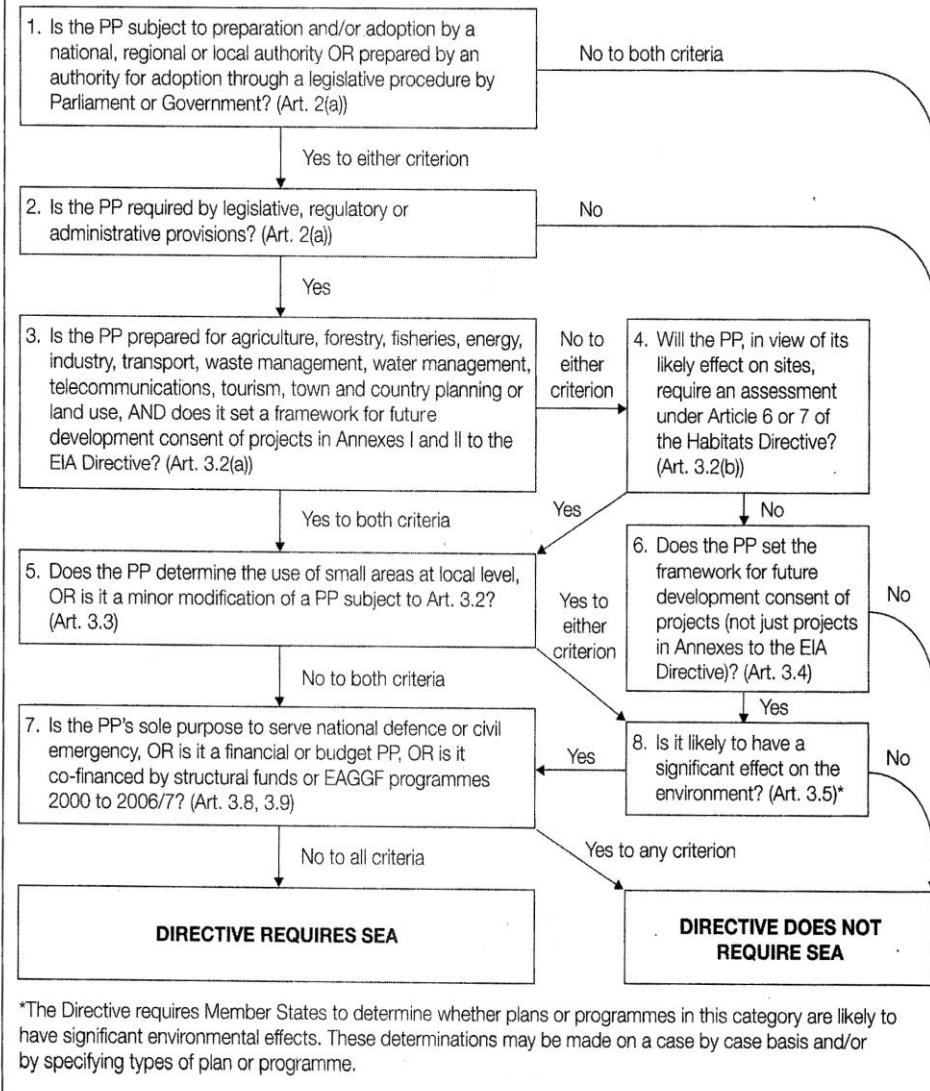
- a. The probability, duration, frequency and reversibility of the effects.
- b. The cumulative nature of the effects.
- c. The trans boundary nature of the effects.
- d. The risks to human health or the environment (e.g. due to accidents).
- e. The magnitude and spatial extent of the effects (geographical 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.

Figure 2 – Application of the SEA Directive to plans and programmes

This diagram is intended as a guide to the criteria for application of the Directive to plans and programmes (PPs). It has no legal status.



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:

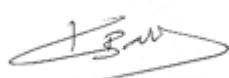
Dated: 31 October 2022



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
Hombeam 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 levers 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



Contents

1. Introduction	1
2. Protected sites covered by this report	1
3. Coastal Adaptation Supplementary Planning Document.....	1
4. Other Plans and Projects	2
5. Assessment of likely significant effects of the Draft Coastal Adaptation Supplementary Planning Document (SPD) on Habitat sites.....	4
6. Summary and conclusions	9
Appendix 1: Sources of background information	11
Appendix 2: Locations of Habitat sites	12
Habitat sites within 20km of the East Suffolk Council- Waveney Local Plan Area	12
Habitat sites within 20km of the East Suffolk Council- Suffolk Coastal Local Plan Area 16	
Habitat sites within 20km of the Great Yarmouth Local Plan Area	20
Habitat sites within 20km of the North Norfolk Local Plan Area.....	24
Habitat sites within 20km of The Broads Authority Local Plan Area	28
Appendix 3: Relevant Habitat sites	32
Appendix 4: Natural England Consultation Response.....	48

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

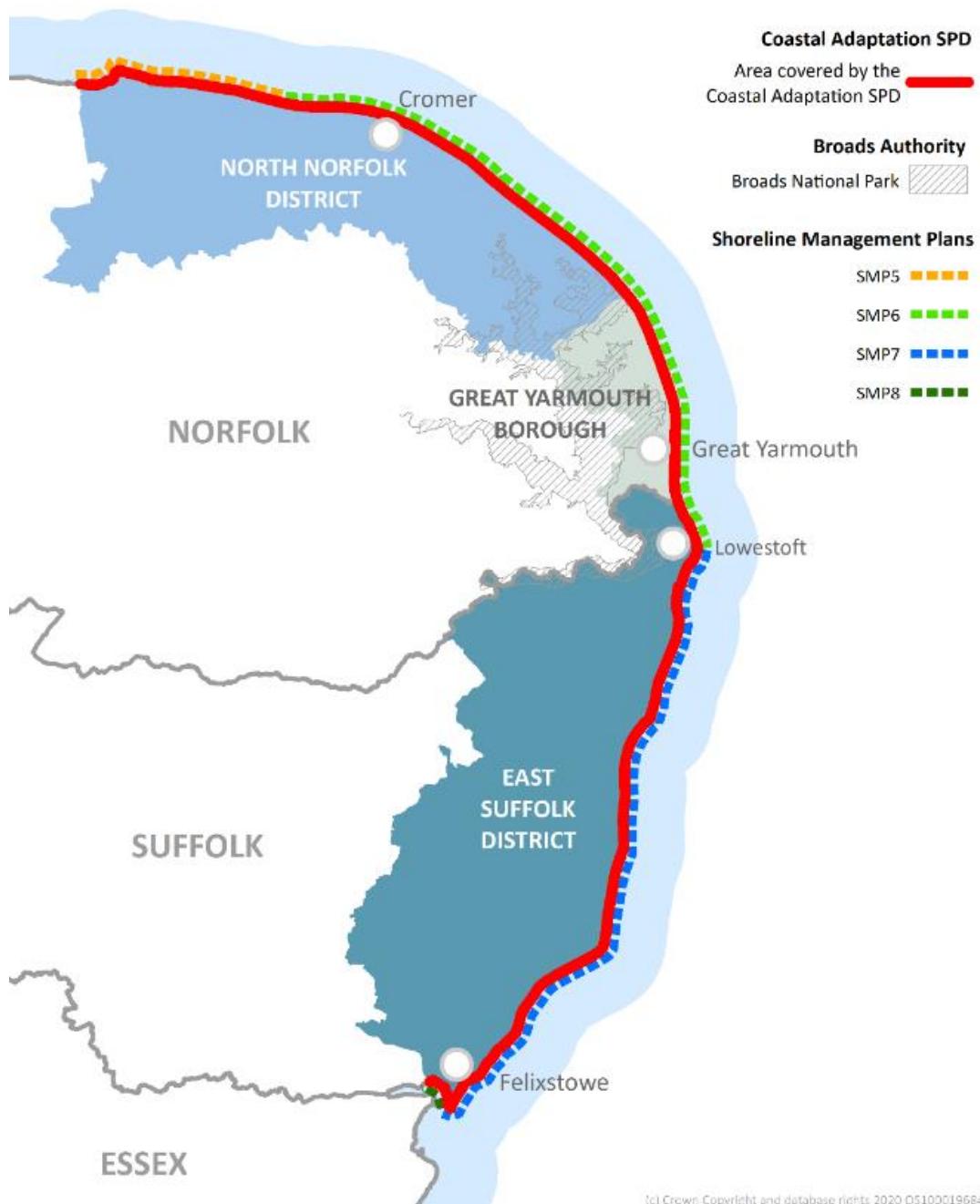


Figure 1: Extent of Coastal Adaptation Partnership Area

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	<p>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.</p> <p>The guidance in this chapter builds on the relevant local plan policies, namely:</p> <p>East Suffolk Council: SCLP9.3 Coastal Change Management Area and WLP8.25 Coastal Change Management Areas.</p> <p>Great Yarmouth Borough Council: GSP4 New Development in Coastal Change Management Areas.</p> <p>North Norfolk District Council: EN11 Coastal Erosion.</p> <p>The Broads Authority: SSCOAST The Coast</p> <p>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.</p> <p>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</p>	None	None	No

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	<p>permitted in CCMAs 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.</p> <p>This chapter also provides specific guidance on use Coastal Erosion Vulnerability Assessment (CEVA).</p> <p>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 CCMAs; 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.</p>			
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 CCMAs 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?
	<p>is beyond the remit of the SPD. The chapter provides guidance on both residential and commercial, business and leisure uses.</p> <p>The guidance in this chapter builds on the relevant local plan policies, namely:</p> <p>East Suffolk Council: Policy SCLP9.4 (Coastal Change Rollback or Relocation) and Policy WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion).</p> <p>Great Yarmouth Borough Council: Policy E2 (Relocation from Coastal Change Management Areas).</p> <p>North Norfolk District Council Policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk)</p> <p>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.</p>			

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	<p>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.</p> <p>This chapter includes reference to opportunities for the rollback or creation of natural habitats through development elsewhere.</p> <p>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.</p>	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



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:

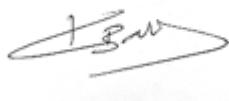
Dated: 31 October 2022



Marie-Pierre Tighe
Director of Strategic Services
The Broads Authority

Signed:

Dated: 31 October 2022



Kim Balls
Principal Strategic Planner
Great Yarmouth Borough Council

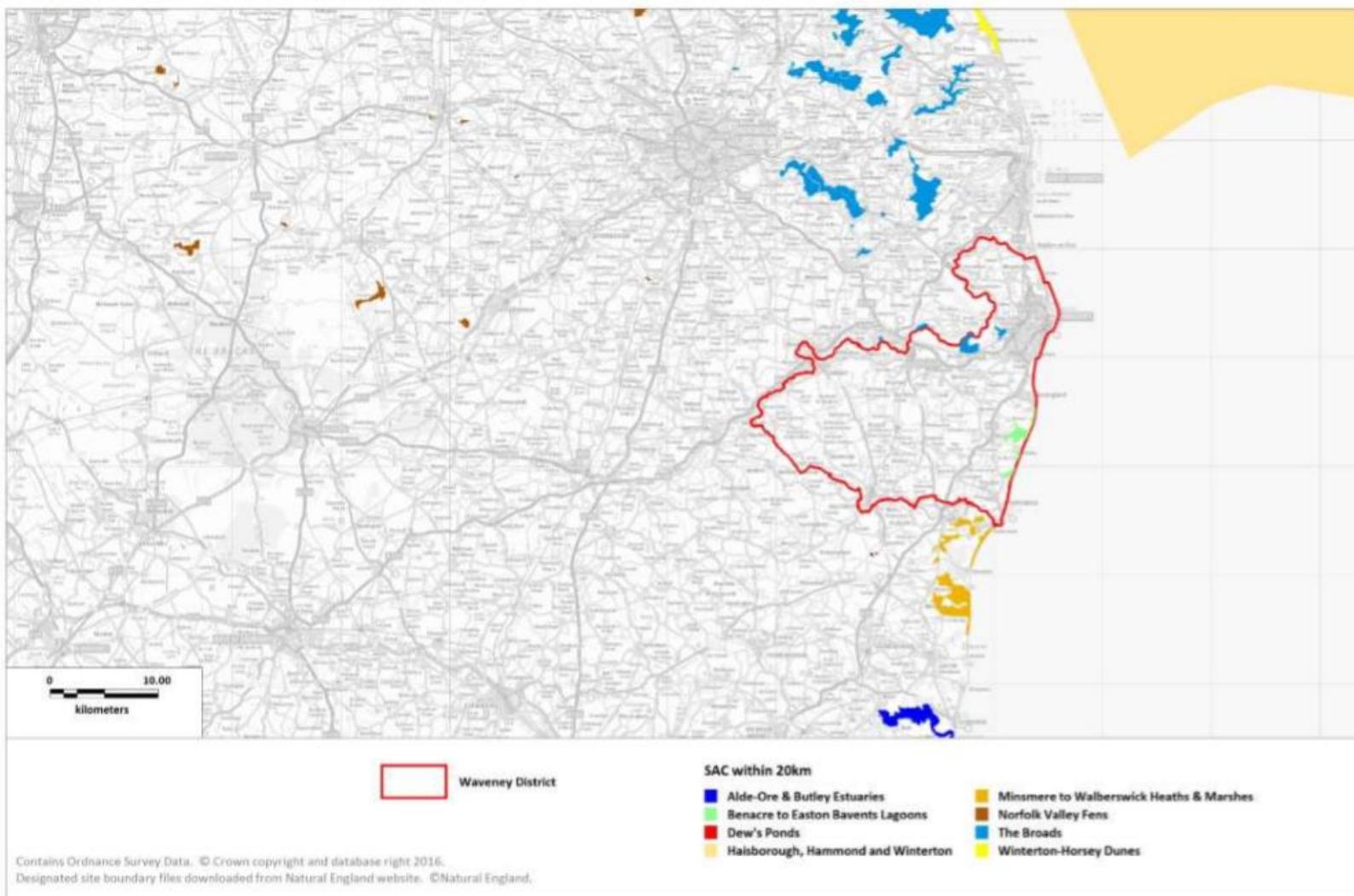
Appendix 1: Sources of background information

- 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)

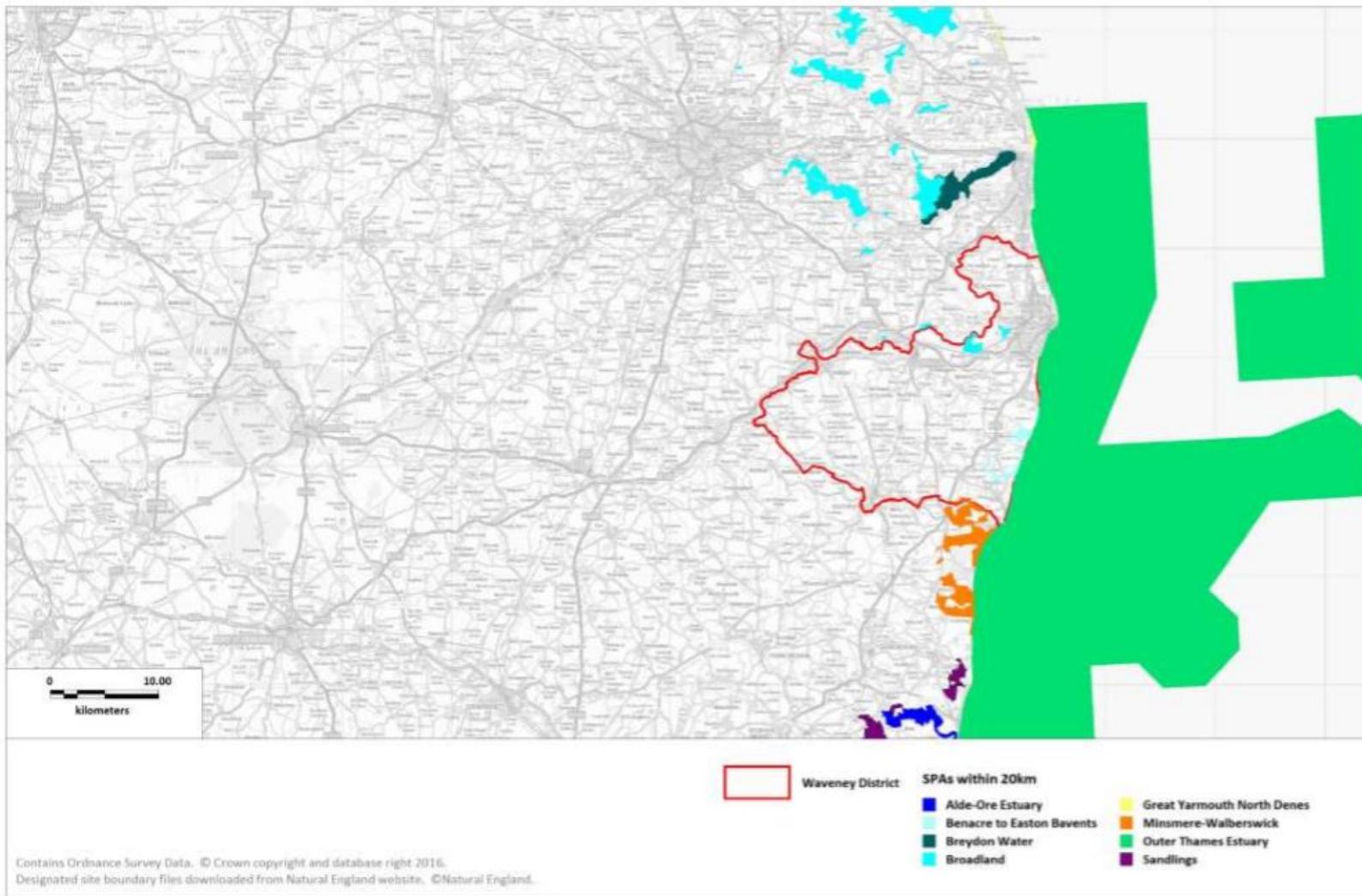
Appendix 2: Locations of Habitat sites

Habitat sites within 20km of the East Suffolk Council-Waveney Local Plan Area

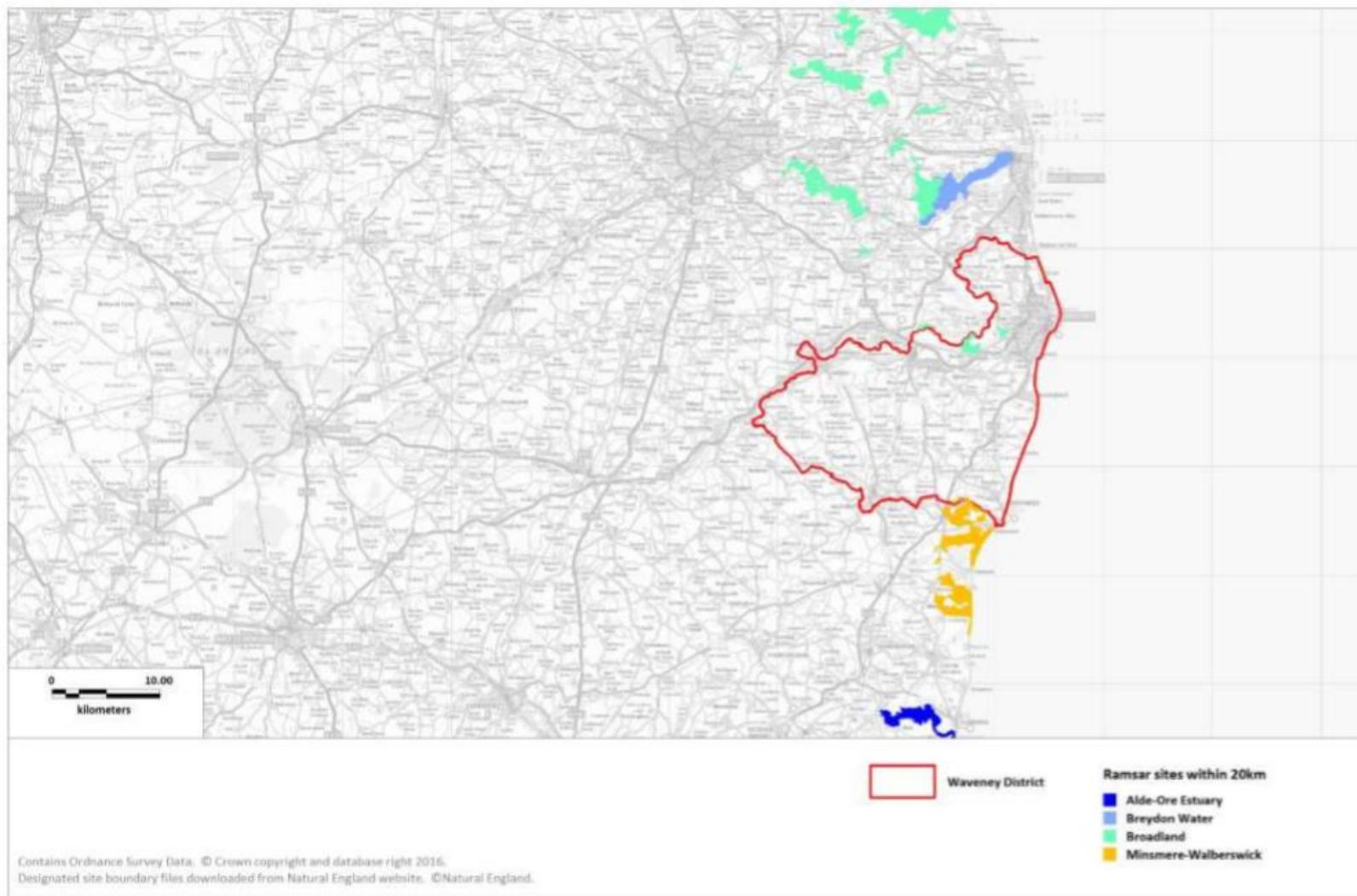
Map 1: SACs



Map 2: SPAs

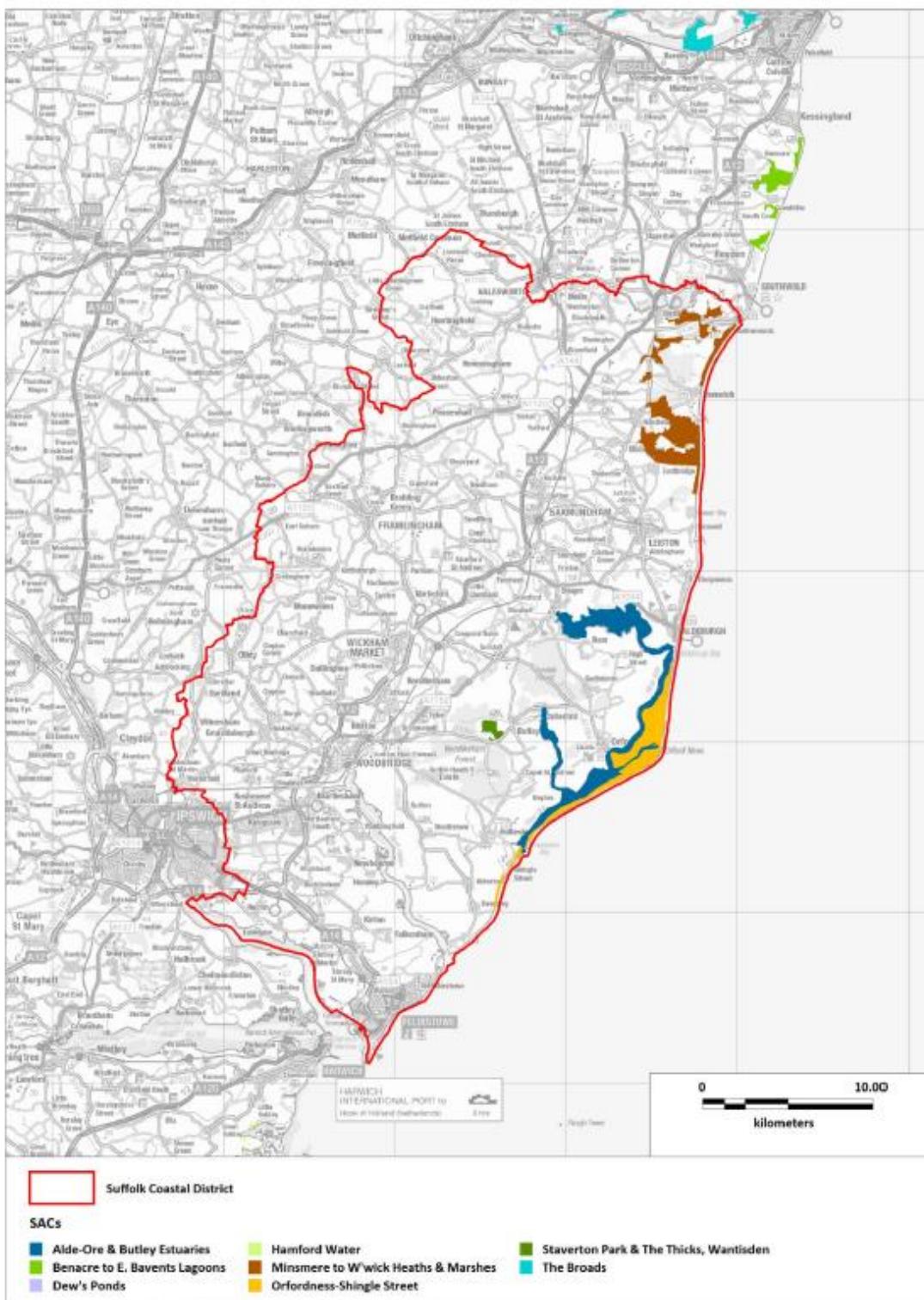


Map 3: Ramsar Sites



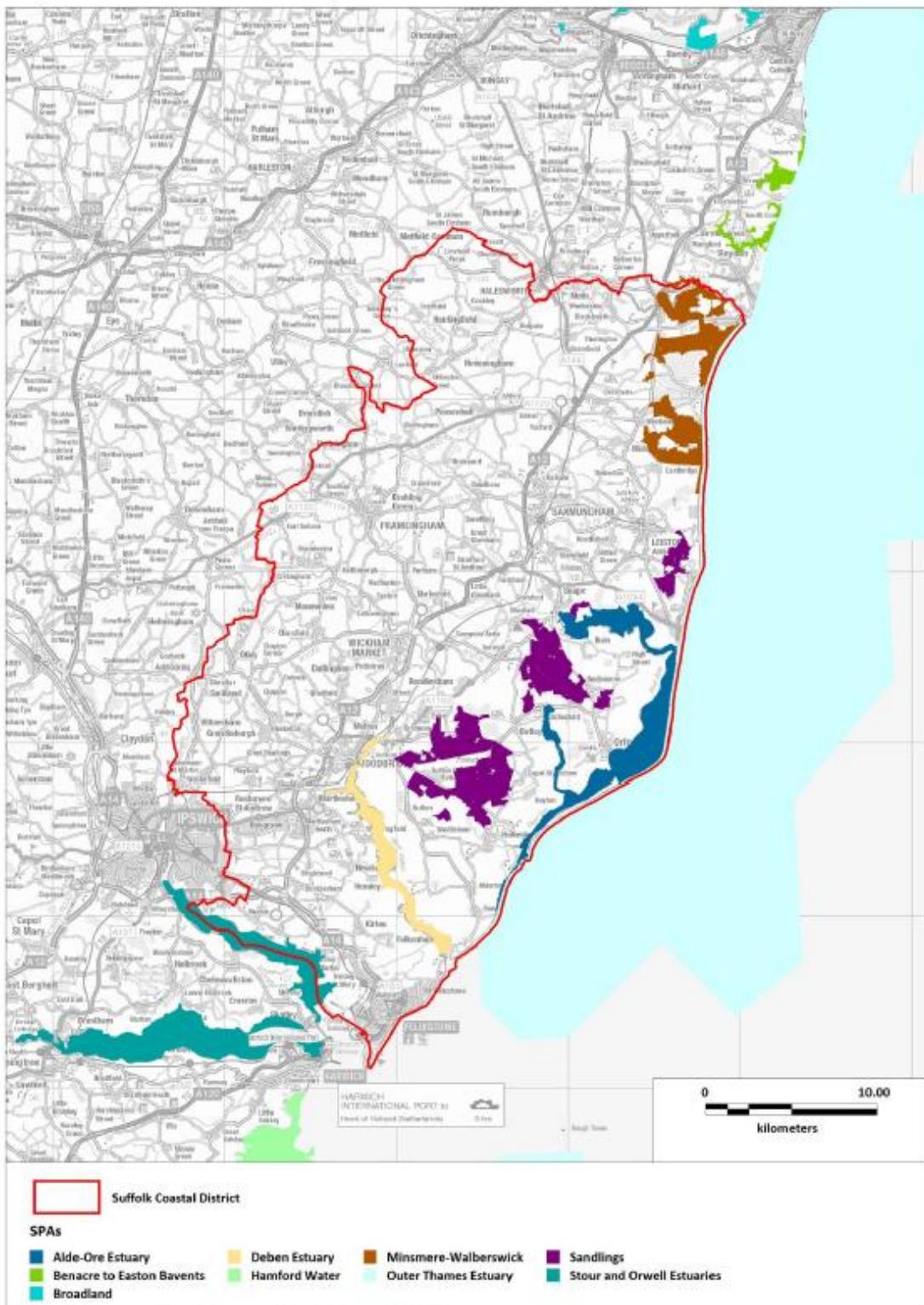
Habitat sites within 20km of the East Suffolk Council-Suffolk Coastal Local Plan Area

Map 1: SAC sites where boundary within 20km of Suffolk Coastal District



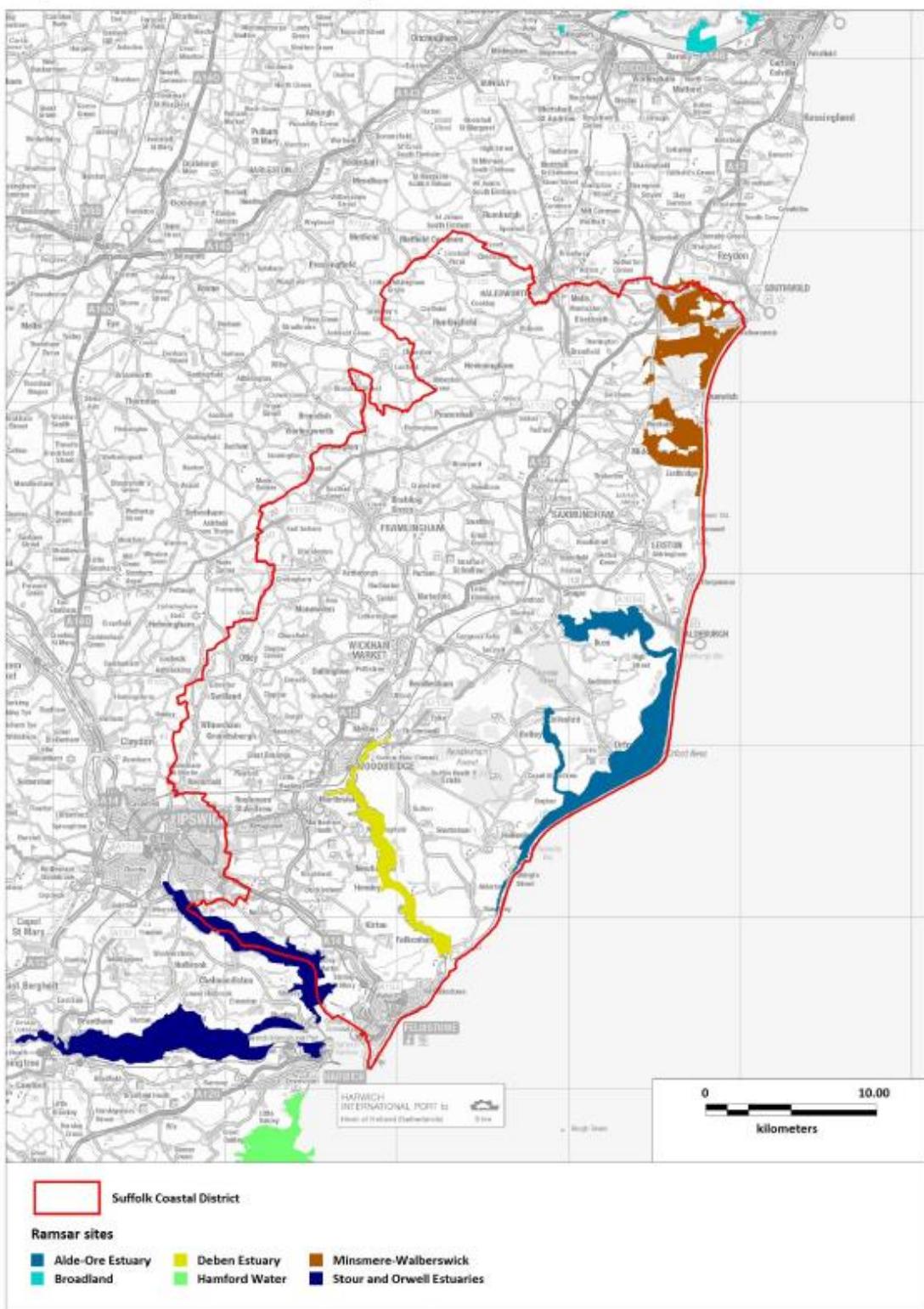
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Map 2: SPA sites where boundary within 20km of Suffolk Coastal District



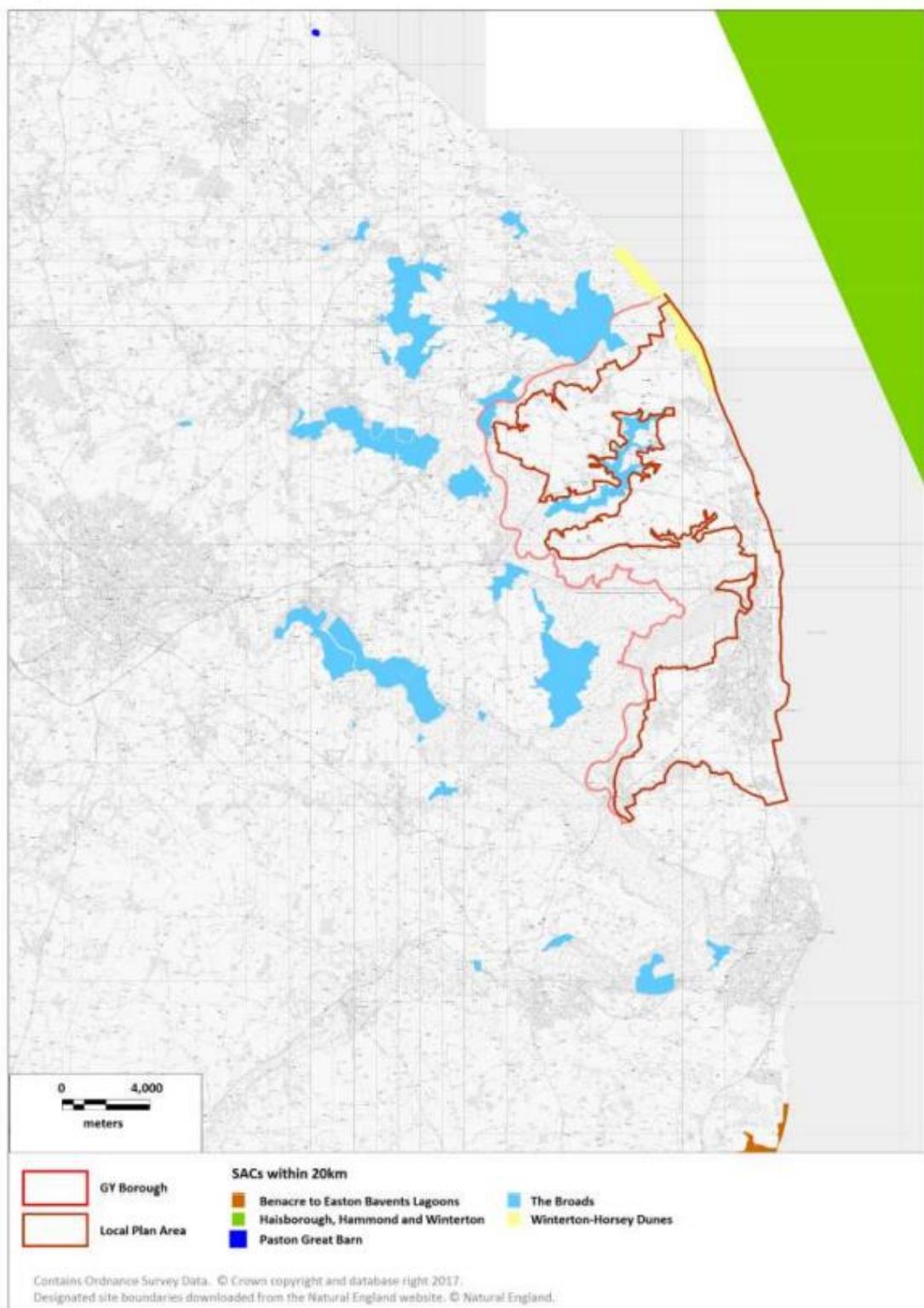
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Map 3: Ramsar sites where boundary within 20km of Suffolk Coastal District

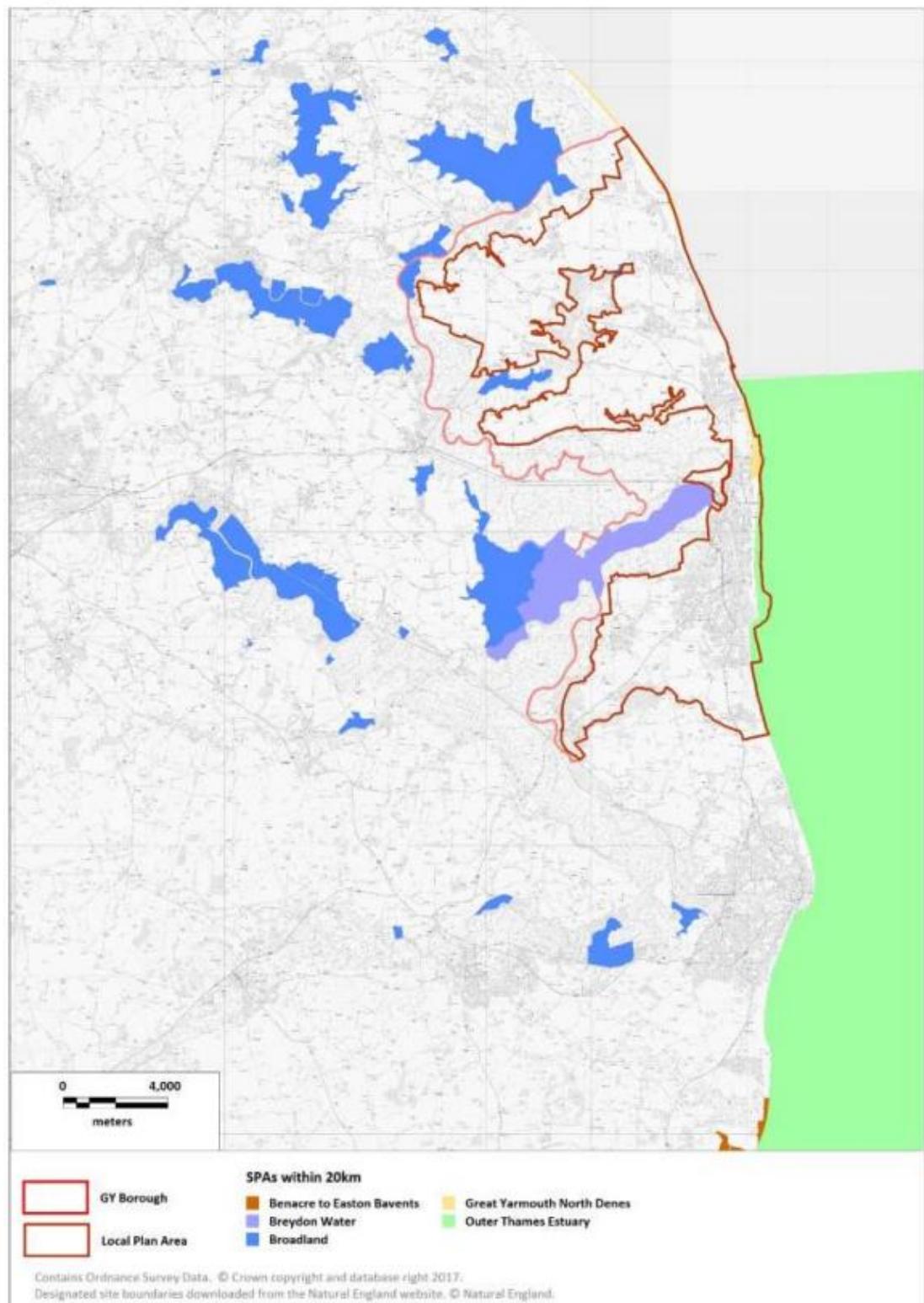


Habitat sites within 20km of the Great Yarmouth Local Plan Area

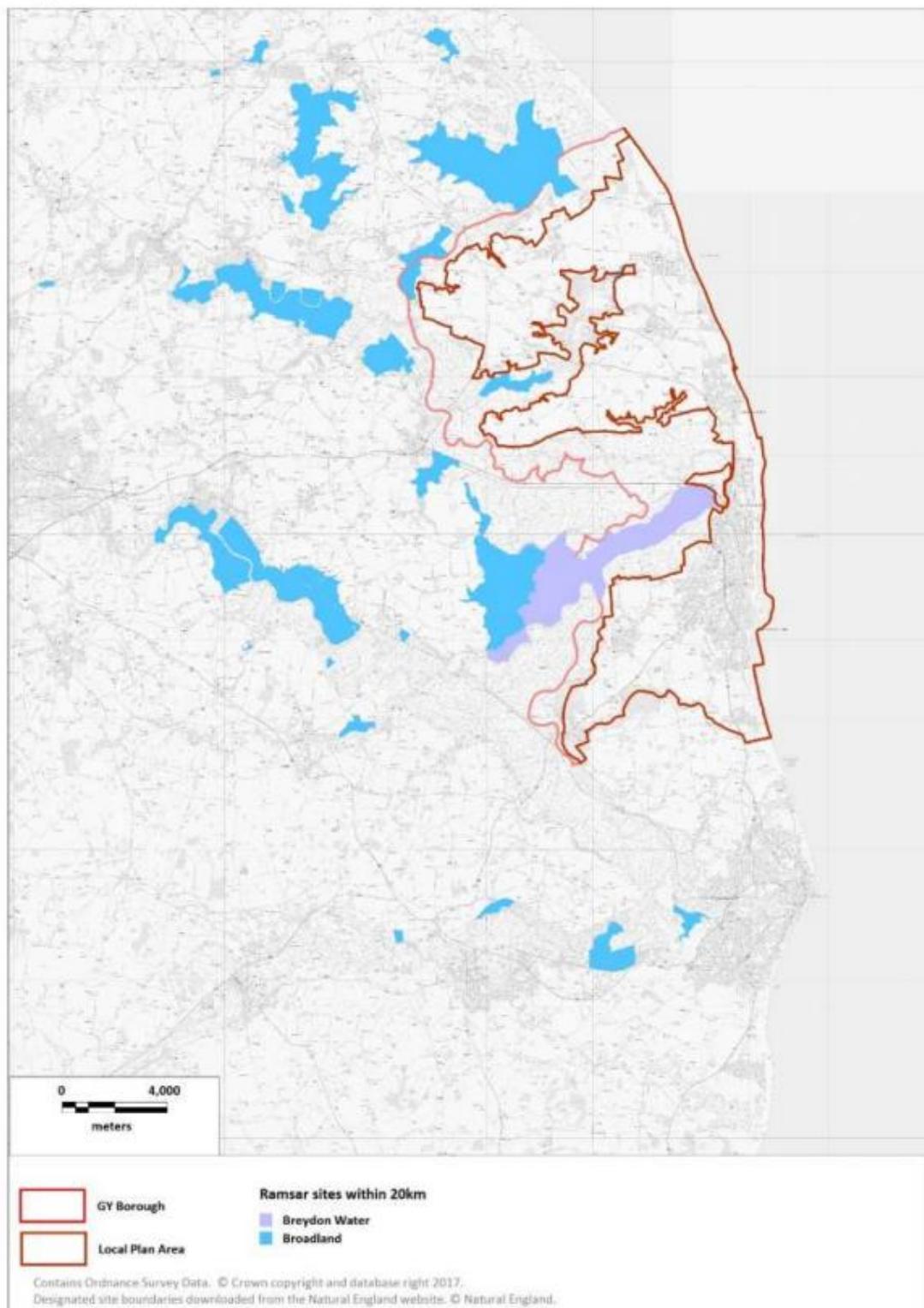
Map 1: SACs and Local Plan Area



Map 2: SPAs and Local Plan Area

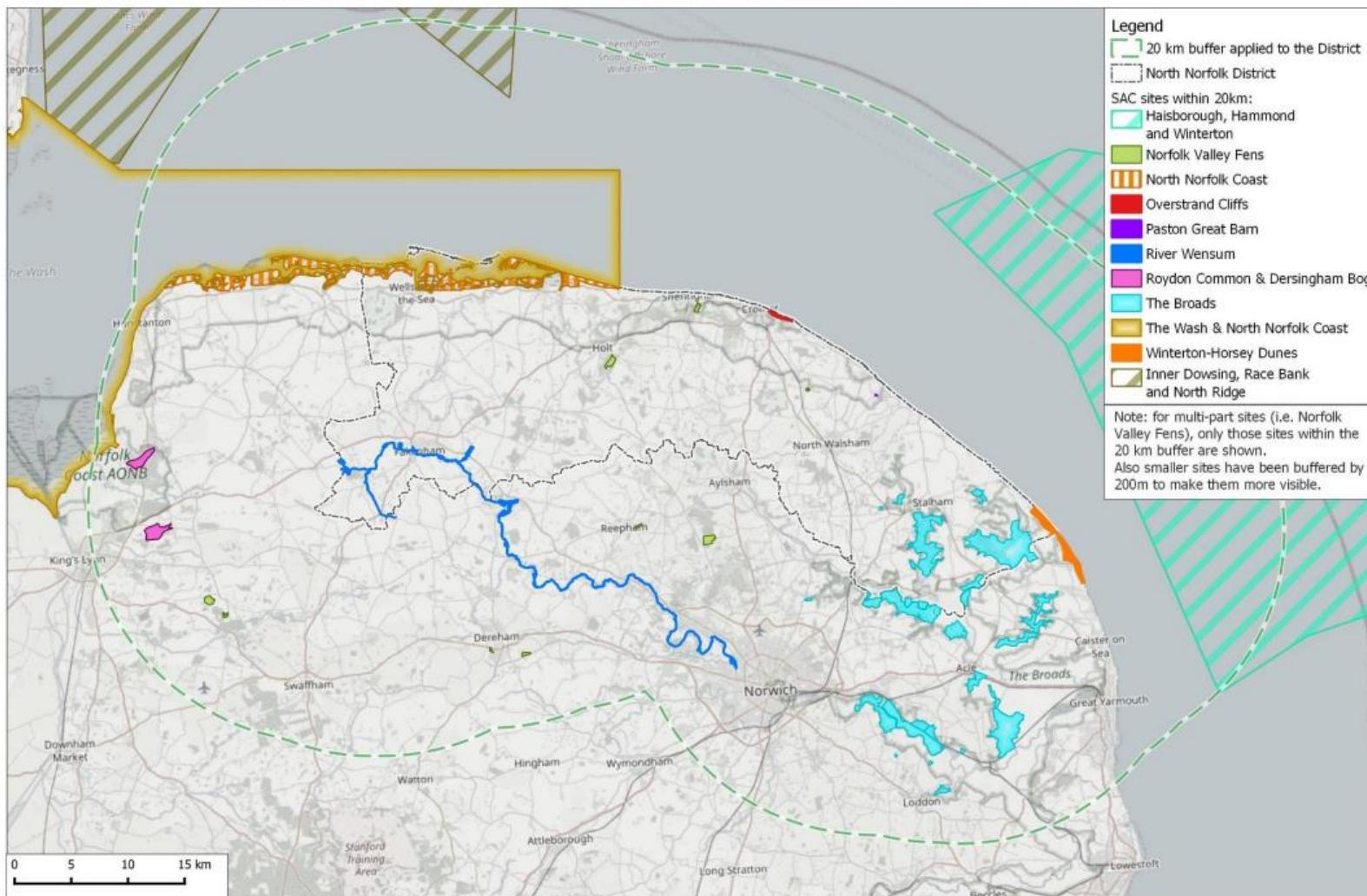


Map 3: Ramsar sites and Local Plan Area



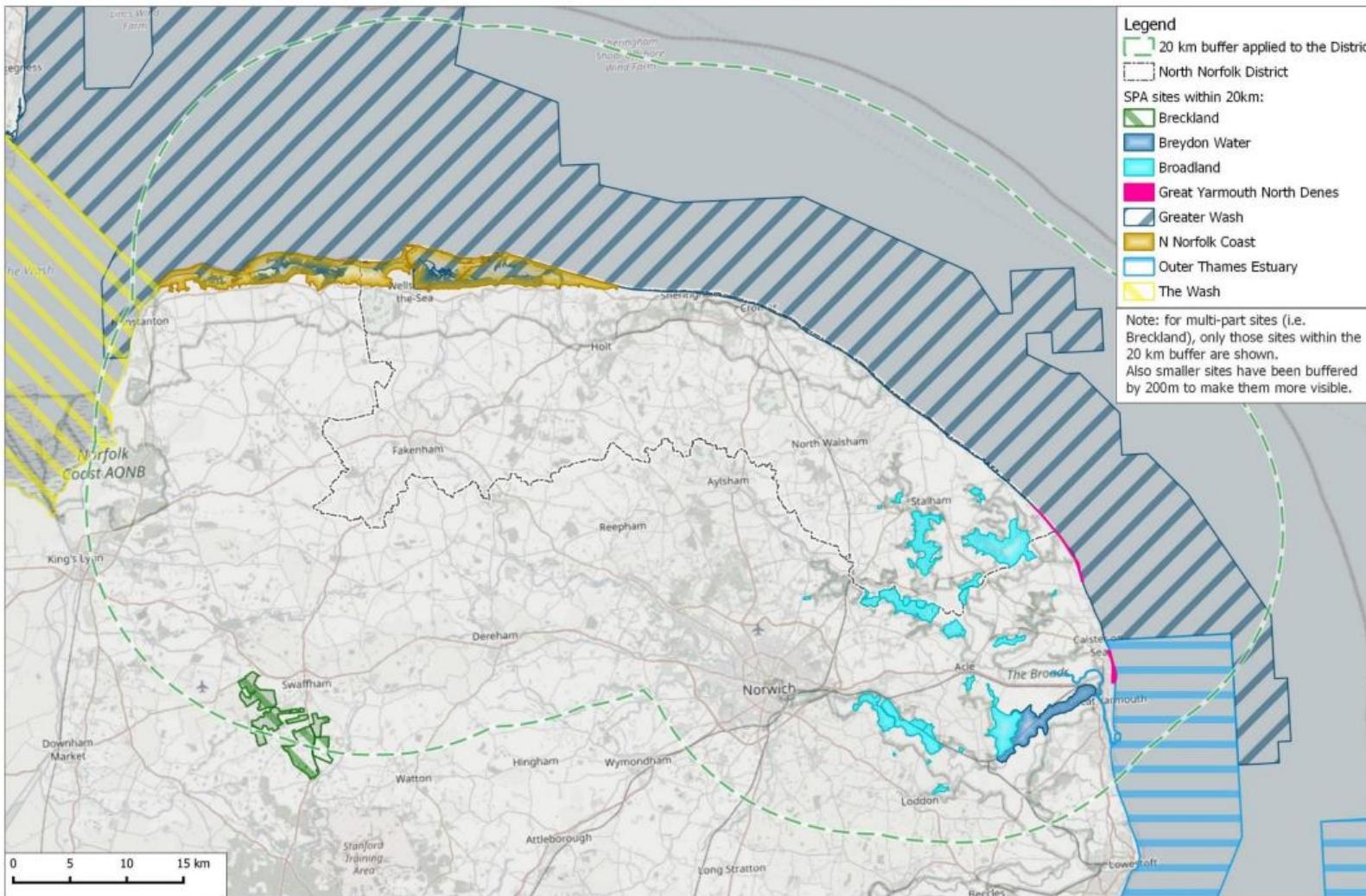
Habitat sites within 20km of the North Norfolk Local Plan Area

Map 2: SAC sites located entirely or partially within a 20 km buffer of the North Norfolk District.



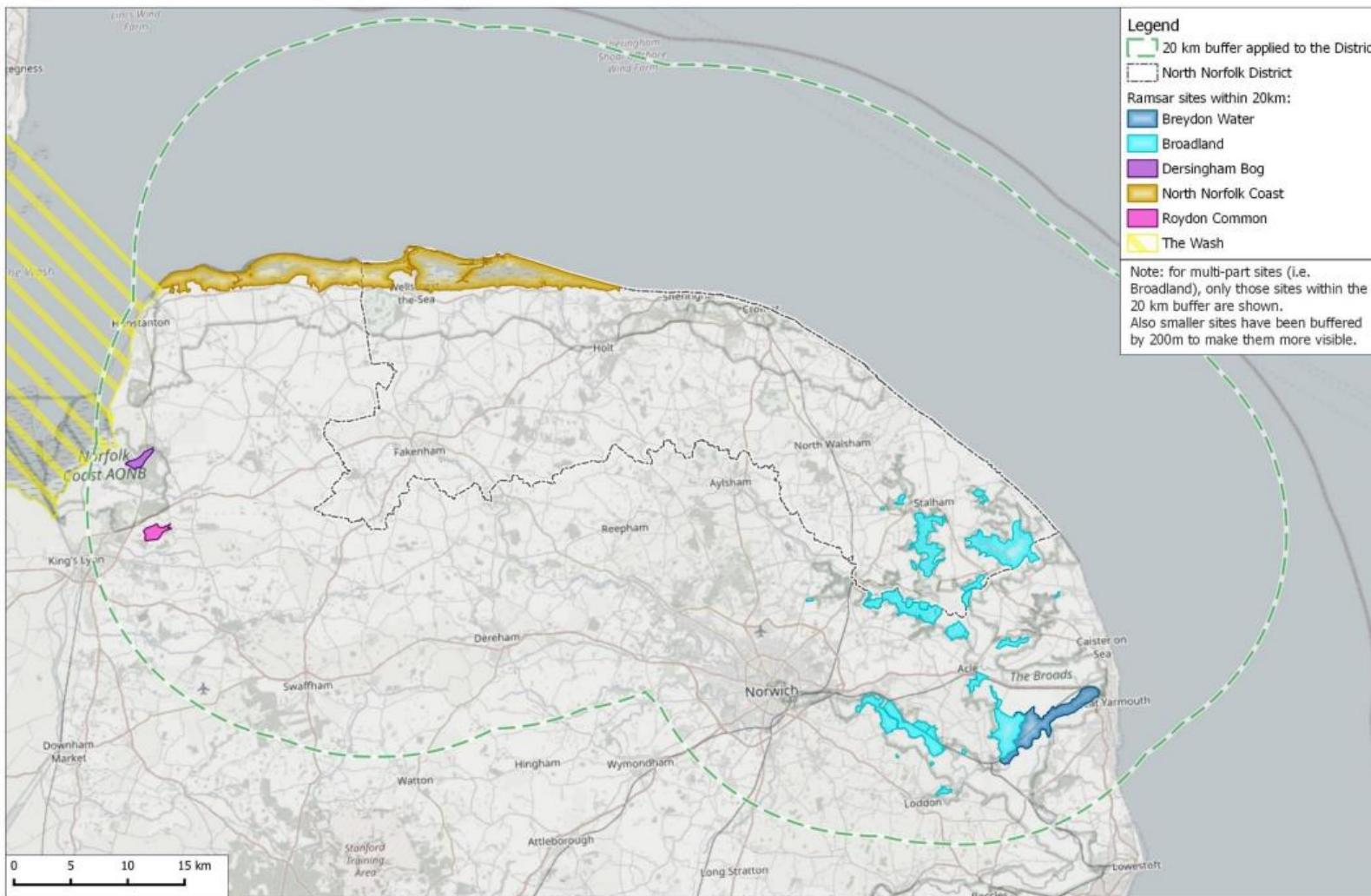
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Map 3: SPA sites located entirely or partially within a 20 km buffer of the North Norfolk District.



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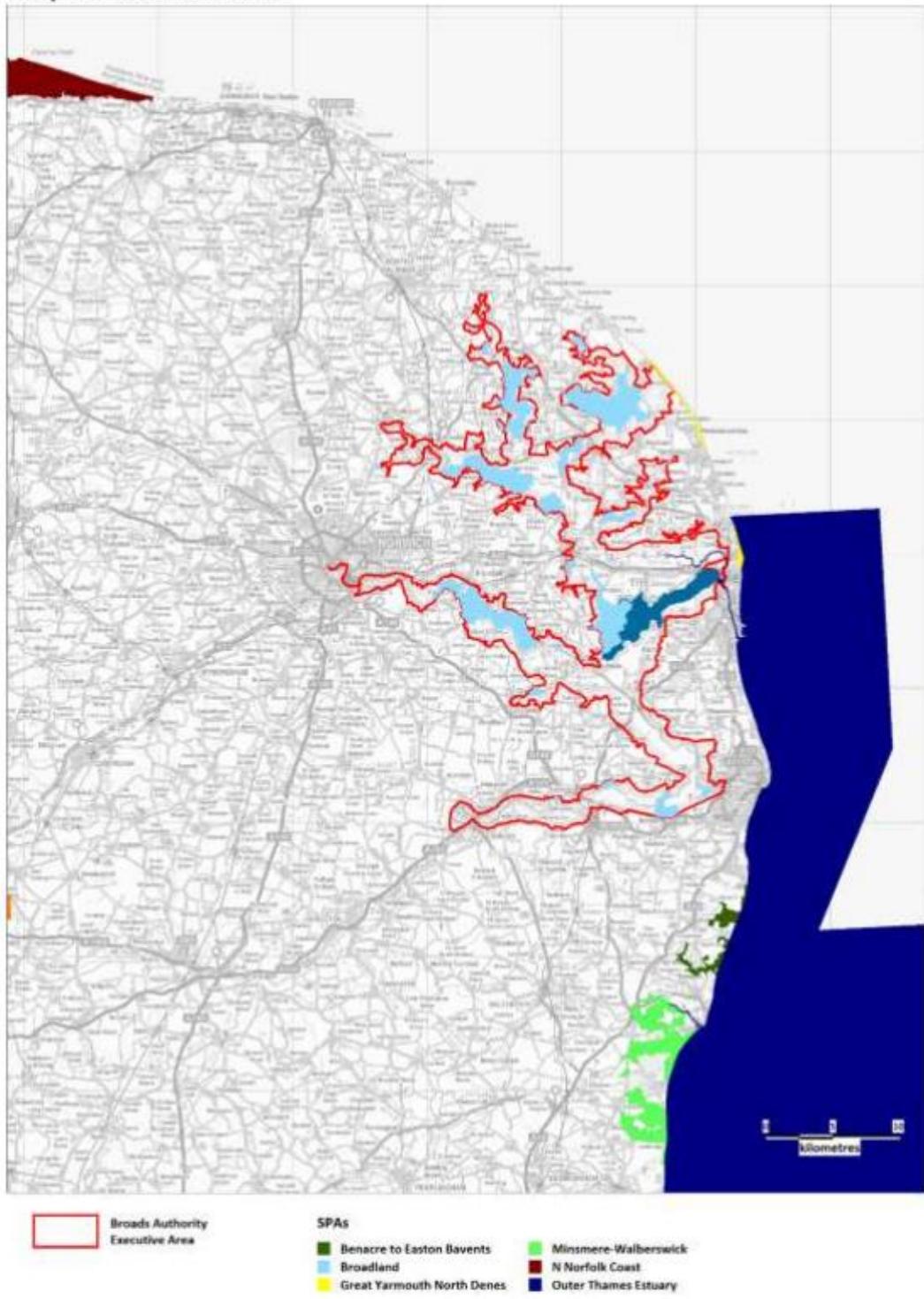
Map 4: Ramsar sites located entirely or partially within a 20 km buffer of the North Norfolk District.



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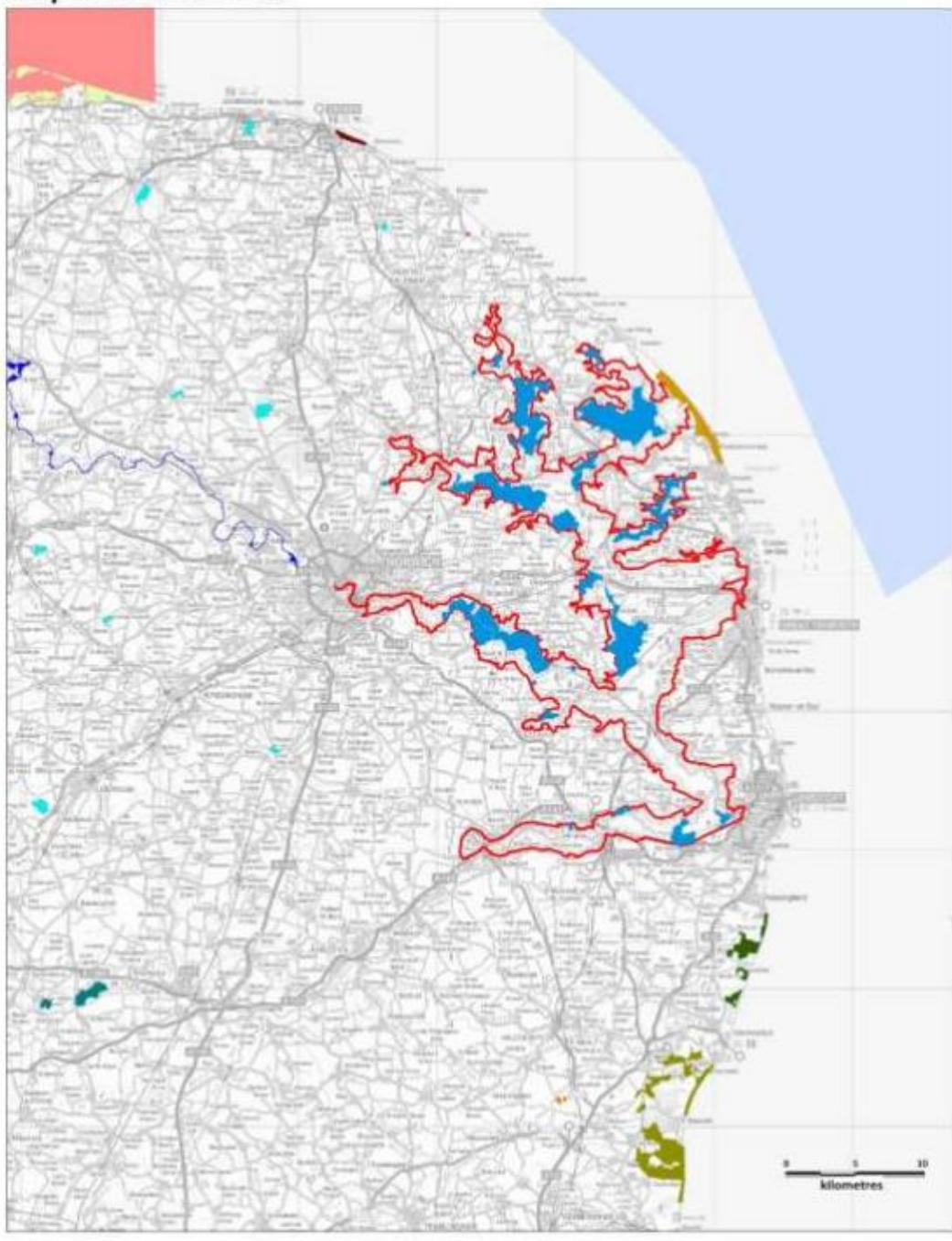
Habitat sites within 20km of The Broads Authority Local Plan Area

Map 2: Selected SPAs



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Map 3: Selected SACs



SACs

- Benacre to Easton Bawdsey Lagoons
- Dew's Ponds
- Halsborough, Hammond and Winterton
- Minsmere to Walberswick Heaths & Marshes
- Norfolk Valley Fens

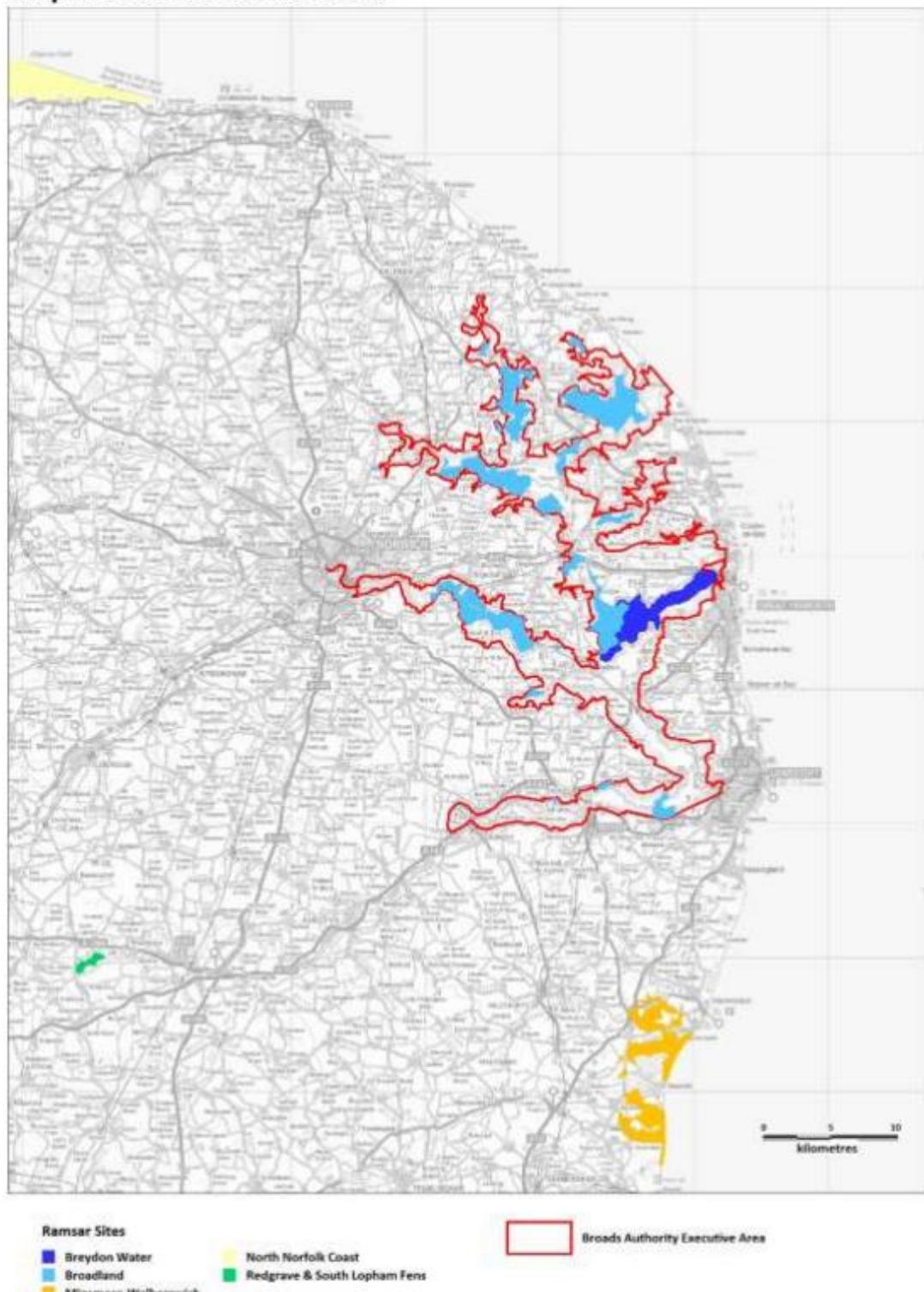
- North Norfolk Coast
- Overstrand Cliffs
- Paston Great Barn
- River Wensum
- The Broads

- The Wash & North Norfolk Coast
- Waveney & Little Ouse Valley Fens
- Winterton-Horsey Dunes

- Broads Authority Executive Area

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Map 4: Selected Ramsar Sites



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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 Seminatural dry grasslands and scrubland facies: on calcareous substrates (Festuco-	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 <i>A. glutinosa</i> , <i>F. excelsior</i> S1166 Great crested newt, <i>Triturus cristatus</i>	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 <i>Triturus cristatus</i> : 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) <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 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 <i>Erica tetralix</i> H4030 European dry heaths H6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>), (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,

	<p>sites") H6410 Molinia meadows on calcareous, peat or clay-silt soil H7210# Calcareous fens with <i>C. mariscus</i> and species of <i>C. davallianae</i> H7230 Alkaline fens H91E0# Alluvial woods with <i>A. glutinosa</i>, <i>F. excelsior</i> S1014 Snail, <i>Vertigo angustior</i> S1016 Desmoulin's Whorl Snail, <i>Vertigo moulinsiana</i></p>	<p>The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.</p>
North Norfolk Coast	<p>H1150# Coastal lagoons H1220 Perennial vegetation of stony banks H1420 Mediterranean and thermo-Atlantic halophilous scrubs (<i>Sarcocornetea fruticosi</i>) H2110 Embryonic shifting dunes H2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ('White dunes') H2130# Fixed dunes with herbaceous vegetation ('Grey dunes') H2190 Humid dune slacks S1355 Otter, <i>Lutra lutra</i> S1395 Petalwort, <i>Petalophyllum ralfsii</i></p>	<p>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;</p> <p>The extent and distribution of qualifying natural habitats and habitats,</p> <p>The structure and function (including typical species) of qualifying natural habitats, and,</p> <p>The supporting processes on which qualifying natural habitats rely.</p>
Orfordness – Shingle Street	<p>H1150: Coastal Lagoons H1210: Annual vegetation of drift lines H1220: Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves</p>	<p>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;</p> <p>The extent and distribution of qualifying natural habitats;</p> <p>The structure and function (including typical species) of qualifying natural habitats; and</p> <p>The supporting processes on which qualifying natural habitats rely.</p>

Overstrand Cliffs	H1230 Vegetated sea cliffs of the Atlantic and Baltic coasts	<p>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:</p> <p>The extent and distribution of qualifying natural habitats;</p> <p>The structure and function (including typical species) of qualifying natural habitats; and</p> <p>The supporting processes on which qualifying natural habitats rely.</p>
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>	<p>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;</p> <p>The extent and distribution of qualifying natural habitats and habitats of qualifying species</p> <p>The structure and function (including typical species) of qualifying natural habitats</p> <p>The structure and function of the habitats of qualifying species</p> <p>The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely</p> <p>The populations of qualifying species, and,</p> <p>The distribution of qualifying species within the site.</p>
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 moulensis</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, Salicion albae) 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,

	<p>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</p>	<p>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.</p>
The Paston Great Barn	S1308: Barbastelle bat <i>Barbastella barbastellus</i>	<p>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;</p> <p>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.</p>
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 <i>Salicornia</i> and other annuals colonising mud and sand	<p>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; —</p>

	H1330 Atlantic salt meadows (Glauco-Puccinellietalia maritimae) H1420 Mediterranean and thermo-Atlantic halophilous scrubs (Sarcocornetea fruticosi) S1355 Otter, Lutra lutra S1365 Harbour (Common) Seal, Phoca vitulina	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 (Calluno-Ulicetea) H2190 Humid dune slacks H2110 Embryonic shifting dunes H2120 Shifting dunes along the shoreline with Ammophila arenaria ("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 oedicnemus</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)	<p>H7210# Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i></p> <p>S1016 <i>Vertigo moulinsiana</i>: Desmoulin's whorl snail</p> <p>H7230 Alkaline fens</p> <p>H6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>)</p> <p>H91E0# Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>)</p> <p>H7140 Transition mires and quaking bogs</p> <p>H3140 Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara</i> spp</p> <p>H3150 Natural eutrophic lakes with <i>Magnopotamion</i> or Hydrocharition-type vegetation</p> <p>S1355 <i>Lutra lutra</i>: Otter</p> <p>S1903 <i>Liparis loeselii</i>: Fen orchid</p> <p>S4056 <i>Anisus vorticulus</i>: Little ramshorn whirlpool snail</p>	<p>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;</p> <p>The extent and distribution of qualifying natural habitats and habitats of qualifying species,</p> <p>The structure and function (including typical species) of qualifying natural habitats,</p> <p>The structure and function of the habitats of qualifying species,</p> <p>The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely,</p> <p>The populations of qualifying species, and,</p> <p>The distribution of qualifying species within the site.</p>
Deben Estuary (also Ramsar site)	<p>A046a: Dark bellied brent goose (non-breeding)</p> <p>A132: Pied avocet (non-breeding)</p>	<p>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:</p> <p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p>

		<p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>
Great Yarmouth North Denes	Little tern <i>Sterna albifrons</i> - A195, b	<p>Subject to natural change, maintain in favourable conditions the habitats for the internationally important populations of the regularly occurring Annex 1 bird species, under the Birds Directive, in particular:</p> <p>Sand/shingle areas</p> <p>Shallow coastal waters</p>
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	<p>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:</p> <p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>
Outer Thames Estuary	A001: Red-throated Diver (Non-breeding) A195: Common Tern (Breeding) A193: Little Tern (Breeding)	<p>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:</p> <p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p>

		<p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>
Minsmere to Walberswick (also Ramsar site)	<p>H4030 European dry heaths</p> <p>H1210 Annual vegetation of drift lines</p> <p>H1220 Perennial vegetation of stony banks</p> <p>A052(B) <i>Anas crecca</i>: Eurasian teal</p> <p>A021(B) <i>Botaurus stellaris</i>: Great bittern</p> <p>A081(B) <i>Circus aeruginosus</i>: Eurasian marsh harrier</p> <p>A082(NB) <i>Circus cyaneus</i>: Hen harrier</p> <p>A224(B) <i>Caprimulgus europaeus</i>: European nightjar</p> <p>A056(B) <i>Anas clypeata</i>: Northern shoveler</p> <p>A056(NB) <i>Anas clypeata</i>: Northern shoveler</p> <p>A051(B) <i>Anas strepera</i>: Gadwall</p> <p>A051(NB) <i>Anas strepera</i>: Gadwall</p> <p>A132(B) <i>Recurvirostra avosetta</i>: Pied avocet</p> <p>A195(B) <i>Sterna albifrons</i>: Little tern</p> <p>A394(NB) <i>Anser albifrons albifrons</i>: Greater white-fronted goose</p>	<p>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;</p> <p>The extent and distribution of the habitats of the qualifying features,</p> <p>The structure and function of the habitats of the qualifying features,</p> <p>The supporting processes on which the habitats of the qualifying features rely,</p> <p>The population of each of the qualifying features, and,</p> <p>The distribution of the qualifying features within the site.</p>
North Norfolk Coast (also Ramsar)	<p>Avocet, <i>Recurvirostra avosetta</i> - A132-A, b</p> <p>Bittern, <i>Botaurus stellaris</i> - A021, b</p> <p>Common Tern, <i>Sterna hirundo</i> - A193, b</p> <p>Dark-bellied Brent Goose, <i>Branta bernicla bernicla</i> - A675, nb</p> <p>Knot, <i>Calidris canutus</i> - A143, nb</p> <p>Little Tern, <i>Sternula albifrons</i> - A195, b</p> <p>Marsh Harrier, <i>Circus aeruginosus</i> - A081, b</p> <p>Montagu's Harrier, <i>Circus pygargus</i> - A084, b</p>	<p>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;</p> <p>The extent and distribution of the habitats of the qualifying features,</p> <p>The structure and function of the habitats of the qualifying features,</p>

	<p>Pink-footed Goose, <i>Anser brachyrhynchus</i> - A040, nb Sandwich Tern, <i>Thalasseus sandvicensis</i> - A191, b Waterbird assemblage</p> <p>Wigeon, <i>Mareca penelope</i> - A050, nb</p> <p>Marsh and coastal habitats, Red-data book/RDB plants, invertebrates and a lichen</p> <p>Dark-bellied Brent Goose, <i>Branta bernicla</i> - Wintering Knot, <i>Calidris canutus</i> - Wintering</p> <p>Pink-footed Goose, <i>Anser brachyrhynchus</i> - Wintering Waterbird assemblage - Wintering</p> <p>Wetland plant assemblage</p> <p>Wigeon, <i>Mareca penelope</i> - Wintering</p>	<p>The supporting processes on which the habitats of the qualifying features rely,</p> <p>The population of each of the qualifying features, and,</p> <p>The distribution of the qualifying features within the site.</p>
Outer Thames Estuary	<p>A001 (W) <i>Gavia stellata</i> Red-throated Diver</p> <p>A195 (B) <i>Sterna hirundo</i> Common Tern</p> <p>A193 (B) <i>Sternula albifrons</i> Little Tern</p>	<p>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;</p> <p>The extent and distribution of the habitats of the qualifying features,</p> <p>The structure and function of the habitats of the qualifying features,</p> <p>The supporting processes on which the habitats of the qualifying features rely,</p> <p>The population of each of the qualifying features, and,</p> <p>The distribution of the qualifying features within the site.</p>
Sandlings	<p>A224: European nightjar (breeding)</p> <p>A246: Woodlark (breeding)</p>	<p>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:</p>

		<p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>
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	<p>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:</p> <p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>
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	<p>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:</p> <p>The extent and distribution of the habitats of the qualifying features</p> <p>The structure and function of the habitats of the qualifying features</p>

	<p>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> -</p>	<p>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.</p>
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	Wintering Waterbird assemblage - Wintering Wetland invertebrate assemblage	
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Appendix 4: Natural England Consultation Response

Date: 14 October 2022
Our ref: 405837



BY EMAIL ONLY

Customer Services
Hombeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

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 levers 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]

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.

Commented [na1]: Councils' as in there is more than one. But this term does not include us... LPAs'?
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 are at risk from coastal erosion/change. SCLP9.4

(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.
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:

Commented [na2]: but there is a policy relating to the short stretch of coast in the Broads Authority Executive Area....

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:

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

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.

Screening of impact on different groups

	Groups	Likely Impact (positive/negative/no impact)	Reason for your decision
a	Age (Includes safeguarding issues)	No impact	<p>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.</p> <p>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).</p> <p>The draft SPD consultation will therefore not discriminate against those from different age groups.</p>
b	Disability	No impact	<p>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.</p>

		<p>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).</p> <p>The draft SPD consultation will therefore not discriminate against those with any disability/ies.</p>
C	Gender reassignment	<p>No impact</p> <p>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.</p> <p>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).</p> <p>The draft SPD consultation will therefore not discriminate against those who have undergone gender reassignment.</p>

D	Marriage and Civil Partnership	No impact	<p>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.</p> <p>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).</p> <p>The draft SPD consultation will therefore not discriminate against those who are married or in a civil partnership.</p>
E	Pregnancy and maternity	No impact	<p>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.</p> <p>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</p>

		<p>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).</p> <p>The draft consultation SPD will therefore not discriminate against those who are pregnant or mothers.</p>
F	Race	<p>No impact</p> <p>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.</p> <p>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).</p> <p>The draft SPD consultation will therefore not discriminate against those from different racial backgrounds.</p>
G	Religion or Belief	<p>No impact</p> <p>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</p>

			<p>are at risk from coastal change. It will therefore not discriminate against this group.</p> <p>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).</p> <p>The consultation will therefore not discriminate against those different religions or beliefs.</p>
H	Sex	No impact	<p>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.</p> <p>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).</p>

		<p>The draft SPD consultation will therefore not discriminate in terms of sexual identity.</p>
I	Sexual orientation	<p>No impact</p> <p>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.</p> <p>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).</p> <p>The consultation will therefore not discriminate in terms of sexual orientation.</p>
J	Socio-economic deprivation	<p>No impact</p> <p>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.</p> <p>Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online,</p>

		<p>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).</p> <p>The consultation will therefore not discriminate against those who are experiencing economic or social deprivation.</p>
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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.

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.