



GREAT YARMOUTH BOROUGH COUNCIL

Cabinet

Date: Monday, 09 October 2023

Time: 14:00

Venue: Supper Room

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

AGENDA

Open to Public and Press

1 **APOLOGIES FOR ABSENCE**

To receive any apologies for absence.

2 **DECLARATIONS OF INTEREST**

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

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

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

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

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

3 ITEMS OF URGENT BUSINESS

To consider any items of Urgent Business.

4 MINUTES

4 - 15

To confirm the minutes of the meeting held on the 11 September 2023.

5 CITYFIBRE PRESENTATION

Cabinet to receive a presentation from CityFibre.

6 23-139 - COASTAL ADAPTATION SUPPLEMENTARY PLANNING 16 - 437
DOCUMENT ADOPTION

Report Attached.

7 23-144 - SUPPLEMENTARY PLANNING DOCUMENT - INITIAL 438 -
CONSULTATION DELEGATION 440

Report attached.

8 23-247 - RURAL ENGLAND PROSPERITY FUND (REPF) GRANT 441 -
SCHEME 447

Report attached.

9 23-063 - STAR SURVEY ACTION PLAN 448 -
457

Report attached.

10 23-140 - ADOPTION OF REPAIRS POLICY 458 -
488

Report attached.

11	<u>23-133 - LONG TERM LEASE ARRANGEMENT AND CONSTRUCTION UPDATE FOR "THE PLACE"</u>	489 - 507
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Report attached.

12	<u>23-081 - 2022/23 TREASURY MANAGEMENT OUTTURN REPORT</u>	508 - 525
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Report attached.

13 EXCLUSION OF PUBLIC

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

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



Cabinet

Minutes

Monday, 11 September 2023 at 14:00

Councillor Smith (Leader & Portfolio Holder for Finance, Governance and Major Projects) (in the Chair), Councillors Bensly (Portfolio Holder for Tourism, Culture & Coastal), Candon (Portfolio Holder for Economic Development & Growth), Flaxman-Taylor (Portfolio Holder for Housing, Health & Communities), Plant (Deputy Leader & Portfolio Holder for Operational Property and Asset Management) & Wells (Portfolio Holder for Environment & Sustainability, Waste and Licensing).

Also in attendance

Ms S Oxtoby (Chief Executive Officer); Ms C Whatling (Monitoring Officer), Mrs N Hayes (Executive Director - Place), Ms K Sly (Executive Director - Finance), Mr I Robertson (Executive Director - Major Projects), Mr C Furlong (Executive Director - Housing Assets), Mrs N Turner (Head of Housing Assets), Mrs M Lee (Head of Customer Services), Mr S Hubbard (Strategic Planning Manager), Mrs S Wintle (Corporate Services Manager), Mr J Wedon (Information Governance Lead & Data Protection Officer) and Miss C Ingram (Communications and Media Officer)

Councillors Wainwright and Williamson attended as observers to the meeting

01 APOLOGIES FOR ABSENCE

There were no apologies for absence received.

02 DECLARATIONS OF INTEREST

There were no declarations of interest declared at the meeting.

03 ITEMS OF URGENT BUSINESS

There were no items of urgent business to be considered.

04 MINUTES

The minutes of the meeting held on the 25 July 2023 were confirmed.

05 23-128 - QUARTER ONE PERFORMANCE REPORT 2023-24

Cabinet received and considered the Information Governance Lead and Data Protection Officer's report.

The Portfolio Holder for Finance, Governance and Major Project's advised that the report presented an update on performance for the first quarter of 2023/24 (April to June), where progress is assessed against Targets which are set at the start of the financial year.

He informed Cabinet that the report also provided an update on the position of key projects that are linked to the corporate priorities from 'The Plan 2020-2025', and the project highlight report detailed in Appendix 1 provided a summary of the project, milestones and achievements, alongside open issues, mitigation and a financial summary.

It was reported that each report had a current status, which could be green, amber or red. Out of the 13 projects, 11 have a current green status defined as no problems or minor issues and 2 have an amber status, defined as having problems which have been identified but with a contingency plan in place.

The performance measures, detailed in Appendix 2, gave a comprehensive overview of how the authority as a whole is performing and covered most Council functions

The Portfolio Holder for Finance, Governance and Major Project's advised that in total there are 44 targeted and 9 monitored measures reported in the first quarter performance report. The monitored measures are reported for contextual information, this data is important information for the Council as the actions of the Council may make improvements however there is not sufficient control over the outcome to set a target.

Of the 44 targeted measures it was reported that 27 were green whereby performance had been met or exceeded target, 12 were Amber whereby performance is below target but within tolerance and 5 were red whereby performance is below target and tolerance. Each of the red measures included a commentary explaining the reasons behind the performance and the actions being taken to bring performance back on target within the report.

The Portfolio Holder for Economic Development and Growth, Councillor

Candon commented that he was pleased to see the establishment of a Member Working Group for the North Quay Riverside Gateway project. Councillor Candon then asked with regard to the covered market place project and the toilet block which had been reported as being 5 weeks behind. It was however reported that this was now back on track and these were now ready to be used.

The Portfolio Holder for Environment and Sustainability, Waste and Licensing, Councillor Wells asked with regard to PR10 and whether information could be given on how many work days in total were being lost by sickness as a whole authority. It was agreed that this information would be sought and circulated to Members following the meeting, the Chief Executive Officer reported that the figure was approximately 10.76 days less per year on last year figure. Councillor Wells also made reference to EN6 within the report which had shown a significant increase in contamination rates for the Borough, and advised that this was being looked into and would be discussed at the Norfolk Waste Partnership meeting.

The Portfolio Holder for Operational Property and Asset Management, Councillor Plant made reference to HN04 and stated that in his opinion this measure needed to be looked at to ensure Council tenants were leaving the properties in a reasonable condition to prevent high costs for void repairs continuing. The Executive Director, Housing Assets advised that the message to customers / tenants regarding expectations was being strengthened with pre inspections before tenants leaving now being undertaken. Councillor Wells asked whether a proportion of the total void repair costs was due to the work that had been completed by GYN, it was advised that although this was a contributing factor a larger proportion was due to the poor state properties were left in by previous tenants.

The Portfolio Holder for Tourism, Heritage and Coastal, Councillor James Bensly asked with regard to the ongoing paving issue at the marketplace and it was advised, that this matter was being discussed by the Great Yarmouth Town Centre Members Working Group who would be looking at the public realm works. Councillor Bensly also passed on his thanks to Officers for their work contributing to good performance measures.

The Leader invited those Members in attendance to observe the meeting the opportunity to ask any questions.

Councillor Wainwright asked with regard to the market place and the budget that had been agreed for these works to be completed and asked whether Norfolk County Council had been contacted to see if a contribution could be made. It was advised that this matter would be considered by the Working Group but it was confirmed that a letter had been written to Norfolk County Council.

Councillor Williamson referred to page 24 within the report which detailed the Wintergardens project and asked for clarification with regard to Heritage England Interventions and their involvement in the project. The Chief Executive Officer advised that Heritage England had been heavily involved in the project and any comments had been taken on board. Councillor Williamson further asked for clarity on the Memorandum of Understanding with a commercial partner and he was advised that there was a need for the council to go back out to procurement for a commercial operator due to the length of time passed with the project.

Cabinet **RESOLVED** to

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

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

06 23-086 - FINAL DRAFT GREAT YARMOUTH BOROUGH-WIDE DESIGN CODE SUPPLEMENTARY PLANNING DOCUMENT

Cabinet considered the Principal Strategic Planner's report which set out recommendations to authorise extension of the current public consultation on the final draft Great Yarmouth Borough-Wide Design Code Supplementary Planning Document.

The Portfolio Holder for Economic Development and Growth, Councillor Daniel Candon reported that the National Planning Policy Framework sets an expectation that all local planning authorities should prepare local design guides or design codes. In turn, the Council has committed to progress a borough-wide design code within its Annual Action Plan.

The Final Draft Great Yarmouth Borough Wide Design Code Supplementary Planning Document (SPD) was approved for formal public consultation under Regulation 13 of the Town and Country Planning (Local Planning) Regulations (2012) by the Development Management Committee on the 12th of July 2023.

On the 21st of July the Final Draft SPD was published for public consultation. The formal consultation period is planned to run for 8 weeks until the 15th of September 2023. To date, the level of public and stakeholder engagement with the consultation has not been as high as expected with a limited number of consultation comments received so far. This could be attributed to the consultation taking place over the summer holiday period.

Given the future importance of the SPD in adding greater detail and interpretation to adopted policies within the development plan, it is recommended to extend the public consultation by a further four weeks, ending on Friday 13th October 2023 to allow people more time to respond.

The final draft of the Supplementary Planning Document, as previously endorsed for public consultation, remains unchanged and is attached to this report at Appendix 1.

Following publication, comments will be taken into account and changes made to the document where necessary and appropriate. It was advised that the document would then be returned to Cabinet for adoption.

Cabinet **RESOLVED** to :

Authorise an extension to the current formal public consultation of the final draft Great Yarmouth Borough-Wide Design Code Supplementary Planning Document (as included in Appendix 1 of the report) by a further 4 weeks.

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07 HR POLICIES

Disciplinary Policy

Cabinet received and considered the Head of Organisational Development's report which presented the new Disciplinary Policy & Procedure to Cabinet, following full consultation with Executive Leadership Team (ELT), UNISON and the Joint Consultative Working Group (JCWG).

The Portfolio Holder for Finance, Governance and Major Projects, reported that the current policy had been revised taking account of up-to-date legislation, the ACAS Code of Practice and reflects learnings from recent cases and case law.

Cabinet **RESOLVED** to :

(1) Approve the new Disciplinary Policy

(2) Give delegated authority to the Head of Organisational Development to make minor and/or consequential amendments to the Policy for the purpose of keeping it up-to-date, clarifying its content or interpretation, correcting any errors or omissions, updating it in accordance with changes in legislation, and/or caselaw, or with changes in the management structure.

Grievance Policy

Cabinet received and considered the Head of Organisational Development's report which presented the new Grievance Policy & Procedure to Cabinet,

following full consultation with Executive Leadership Team (ELT), UNISON and the Joint Consultative Working Group (JCWG).

The Portfolio Holder for Finance, Governance and Major Projects, reported that the current policy had been revised taking account of up-to-date legislation, the ACAS Code of Practice and reflects learnings from recent cases and case law.

Cabinet **RESOLVED** to :

(1) Approve the new Grievance Policy

(2) Give delegated authority to the Head of Organisational Development to make minor and/or consequential amendments to the Policy for the purpose of keeping it up-to-date, clarifying its content or interpretation, correcting any errors or omissions, updating it in accordance with changes in legislation, and/or caselaw, or with changes in the management structure.

Bullying and Harassment Policy

Cabinet received and considered the Head of Organisational Development's report which presented the new Bullying and Harassment Policy to Cabinet, following full consultation with Executive Leadership Team (ELT), UNISON and the Joint Consultative Working Group (JCWG).

The Portfolio Holder for Finance, Governance and Major Projects, reported that currently information about bullying and harassment was contained within the old Grievance Policy. In reviewing the Grievance Policy, the information had been reviewed in line with ACAS guidance and is provided as a separate policy, with the addition of 'discrimination' and also includes information on 'victimisation' to bring it up to date.

The new policy provides clear information to employees, managers and others about what might constitute bullying or harassment and the steps which they can take to prevent and stop it.

Cabinet **RESOLVED** to :

(1) Approve the new Bullying, Harassment and Discrimination Policy

(2) Give delegated authority to the Head of Organisational Development to make minor and/or consequential amendments to the Policy for the purpose of keeping it up-to-date, clarifying its content or interpretation, correcting any errors or omissions, updating it in accordance with changes in legislation, and/or caselaw, or with changes in the management structure.

Menopause Policy

Cabinet received and considered the Head of Organisational Development's report which presented the new Menopause Policy to Cabinet, following full consultation with Executive Leadership Team (ELT), UNISON and the Joint Consultative Working Group (JCWG).

The Portfolio Holder for Finance, Governance and Major Projects, reported that every woman and trans and non-binary people will go through the menopause and around one in five will experience severe menopausal symptoms that are likely to affect them, and their colleagues, in the workplace.

At the Council, 62% of staff are female, and of those, 71% are of menopausal age. Currently 43% of our total workforce are of menopausal age and could suffer with symptoms which may affect them in the workplace.

Introducing a policy and educating managers is one of the best ways organisations can support menopause at work.

Cabinet **RESOLVED** to :

(1) Approve the new Menopause Policy

(2) Give delegated authority to the Head of Organisational Development to make minor and/or consequential amendments to the Policy for the purpose of keeping it up-to-date, clarifying its content or interpretation, correcting any errors or omissions, updating it in accordance with changes in legislation, and/or caselaw, or with changes in the management structure.

08 23-135 - WELLESLEY 3G - PROPOSED HIRE CHARGES

Cabinet received and considered the Executive Director, Place's report which proposed fees and charges in relation to hire charges at the Wellesley 3G Pitch.

The Portfolio Holder for Housing Health and Communities, Councillor Flaxman-Taylor, reported that following significant investment from Great Yarmouth Borough Council and the Football Foundation, a new fenced and floodlit artificial 3G grass football pitch had now been installed at the Wellesley Recreation Ground. This included works to refurbish the Grade II Listed Tennis Pavilion to provide toilet, kitchen and changing provision on the site, enhancing the facilities available on site.

Following an initial testing period, there is significant demand from community groups to be able to book and use these wonderful facilities, and the council seeks to open these facilities to the public this month.

In line with the fees and charges policy, the paper presented to Cabinet

outlined the proposed charges for the 3G pitch. These charges are fair and sustainable, with lower charges at certain times to support community groups.

The Portfolio Holder for Tourism, Heritage and Coastal, Councillor Bensly commented on what a fantastic asset this facility was to the Borough but commented that he had hoped the facility would be maintained to a high standard. Councillor Flaxman-Taylor advised that the Leisure Strategy & Contract Manager would be overseeing the site and reminded Members that CCTV cameras had now been installed to provide monitoring of the site also. Councillor Flaxman-Taylor also advised that regular maintenance would be undertaken at the site.

Councillor Williamson asked why the facility at Lynn Grove Highschool had not been included in the analysis of pricing as this was the same size facility as the Wellesley. The Executive Director, Place advised that she had been unable to locate a pricing schedule for the use of the Lynn Grove site. Councillor Flaxman-Taylor also commented on the soon to open 3G facility at the East Norfolk Sixth form college and the need for pricings to be monitored. The Executive Director, Place confirmed that these fees would be monitored and brought back to Cabinet accordingly if required.

Cabinet **RESOLVED** to :

Approve the proposed Fees and Charges.

09 APPOINTMENT OF DIRECTOR TO GYS LIMITED

Cabinet received and considered the Monitoring Officer's report which asked Cabinet to consider the appointment of an additional Company Director for Great Yarmouth Services Ltd.

Cabinet RESOLVED to :

Appoint Councillor Paul Wells as Portfolio Holder for Environment and Sustainability, Waste and Licensing, as a Company Director of Great Yarmouth Services Limited.

10 23-047 - COUNCIL TAX SUPPORT - OPTIONS FOR 2024/25 SCHEME

Cabinet received and considered the Head of Customer Service's report which outlined options for Great Yarmouth Borough Council's Local Council Tax Support Scheme for 2024/25 for Cabinet to consider in relation to public consultation on next year's scheme.

The Portfolio Holder for Finance, Governance and Major Projects, advised that the

report asked Cabinet to consider the options to include within the public consultation which were outlined in Section 4 of the report.

It was advised that Appendix 1 provided a further breakdown of the financial impact of the options proposed and included a suggested hardship fund to help more vulnerable households should any changes to the scheme be decided.

Cabinet were informed that the results of the consultation and recommendations for the 2024/25 Council Tax Support scheme would be further considered by Cabinet Members following the consultation period, which would then proceed to full Council for decision in December.

The Portfolio Holder for Economic Development and Growth, Councillor Candon commented that he was pleased to see that the council was looking at a more focussed approach for those on particular benefits.

Cabinet **RESOLVED** to :

Grant permission to consult on the options as outlined within the report for the 2024/25 Local Council Tax Support Scheme.

11 23-069 - HRA SERVICE CHARGE REVIEW

Cabinet received and considered the Tenancy Services Manager's report which outlined a proposed revised approach to charging of services for Council Tenants and Leaseholders with a focus on caretaking and gardening services in communal areas.

The Portfolio Holder for Operational Property and Asset Management, advised that currently tenants paid the same charge for caretaking services despite a range of service levels being delivered in different locations. All tenants pay for gardening services as part of the overall rental charge, including tenants who don't reside in communal areas.

The proposal set out a revised approach which was fairer and more transparent so that only tenants and leaseholders who receive a service are charged as well as introducing differential charges such as for caretaking to reflect the frequency of works delivered.

To support a fairer charging approach, it was proposed that all tenants and leaseholders be consulted on the approach of introducing service charges for all services provided such as communal lighting, gardening services which are currently paid for via rental income and that charges reflect service levels.

The new approach to service charges would be implemented from April 2024, with the service charge rates reviewed to reflect the 2024/5 budget and approved as part of the 2024/5 HRA Budget unless significant concerns are raised by tenants/leaseholders through the consultation process.

The Portfolio Holder for Environment and Sustainability, Waste and Licensing commented that although he was very comfortable with the approving of this

item for consultation he felt that a separate piece of work should be completed to understand what the real cost control implications were to ensure there was a complete picture of actual cost.

Cabinet **RESOLVED** to :

1. Note the report
2. Approve consultation with tenants/leaseholders on de-pooling service charges and levying charges in accordance with the different level of services delivered in each area.

12 23-137 - 2023/24 BUDGET MONITORING REPORT PERIOD 3

Cabinet received and considered the Executive Director of Resource's report which presented the month 3 budget monitoring position for financial year 2023/24 for both the General Fund and Housing Revenue Account (HRA) including the respective capital programmes and financing. The report included explanations for significant variances to the budgets currently forecast for the full year.

The Portfolio Holder for Finance, Governance and Major Projects reported that the General Fund Summary detailed at Appendix A within the report showed the high-level forecast budget monitoring position at 30 June 2023 of a deficit position of a call on reserves for the current year required of £1.2million, this is a variance of £307k from the current budget. He advised that there were a number of pressures on the revenue account, namely from achievement of rental and property income, fees and charges income and the demand for temporary housing.

Members were advised that the General Fund capital 2023/24 budget stood at £46.9m as at month 3, any unspent capital budgets for ongoing capital projects at the end of March 2024 will mainly be carried forward to 2024/25. The position will continue to be monitored as projects progress.

The Housing Revenue Account currently showed a forecast deficit for 2023/24 of £2.426m, compared to a current budgeted deficit of £2.338m, resulting in an unfavourable movement of £89k. The overall income and expenditure position will continue to be monitored going forward.

The Portfolio Holder reported that the report also included the latest position on the capital programme for the HRA for the same period which is not showing any significant variance from the original budget at this time. He advised that spend would increase in later periods as areas of works were fully mobilised. A capital budget totalling £10.5m is currently forecast to be delivered within 2023/24

Members were advised that the regular review and monthly monitoring of the all the budgets provided a sound basis for the preparation of estimates for 2024/25 work which was currently underway.

The detail within the report highlighted the spending and income pressures for the HRA and general fund, that are continuing to place financial pressure on Local Authorities and where these are expected to result in an impact to the full year budget.

The overall financial position continues to be closely monitored and corrective action taken as applicable.

Councillor Wainwright asked for an update on the progression of the recently approved closure of the Greyfriars building and asked why no progression had been made on this matter. The Leader advised that work was ongoing with this matter and staff had been fully consulted.

Councillor Wainwright further asked with regard to whether the roll out of communal bins was on target and asked that Local Members be kept informed of the progress with this matter. Councillor Wells advised that work was ongoing with this matter and once more solid information was available, Local Ward Members would be informed and updated.

Cabinet **RESOLVED** to :

- 1) Note the content of the report and the revised forecast for the General Fund and Housing revenue Account for 2023/24.
- 2) Approve the updated General Fund capital programme (Appendix E).

13 23-117 -NORTH QUAY RIVERSIDE GATEWAY, GREAT YARMOUTH

Cabinet received and considered the Executive Director of Major Project's report which reported that Great Yarmouth Borough Council (GYBC) were successful in securing Town Deal Funding and Levelling Up Funding 2 (LUF 2) to regenerate North Quay. To deliver a successful 'gateway destination' mixed-use leisure, retail and residential regeneration project and to support the procurement of a development partner and mitigate risk at a future Compulsory Purchase Order (CPO) Public Inquiry, it is essential that there is a multi-disciplinary team appointed by the Council to assist in delivery of the critical path milestones.

The Portfolio Holder for Finance, Governance and Major Projects advised that the report highlighted the need for Cabinet note the budget approved by Cabinet in July 2023 for the Land Assembly & Engagement Strategy, to review the overall funding budget and critical path programme and Vauxhall Bridge proposals, to review the range of professional services required to help deliver a project of this scale and to approve a project budget that will be monitored quarterly by the North Quay Members Working Group.

Cabinet **RESOLVED** to :

- (1) Approve a project budget of £26,660,484 with £16,442,706 allocated to

land assembly, CPO costs and £10,217,778 for procurement, gateway public realm works, design, surveys and planning costs.

(2) Approve the proposals and delegate officers to progress discussions with Rail Paths Ltd and Great Yarmouth Preservation Trust to form a Strategic Partnership with the objective to secure the sustainable future of the Vauxhall Bridge

(3) Delegate authority to the Executive Director - Major Projects, in consultation with the Leader, Deputy Leader, Chief Executive, s151 officer to release Town Deal and LUF 2 funding for procurement and appointments of a project professional team, authorise surveys, reports, collection of data and undertake capital works for the progression and delivery of this project.

14 CONFIDENTIAL MINUTES

The confidential minutes of the meeting held on 25 July 2023 were confirmed.

The meeting ended at: 15:10

CABINET



URN: 23-139

Report Title : Coastal Adaptation Supplementary Planning Document Adoption

Report to: Cabinet

Date of meeting : 9th October 2023

Responsible Cabinet Member: Daniel Candon

Responsible Director / Officer : Natasha Hayes, Executive Director – Place / Kim Balls, Principal Strategic Planner

Is this a Key decision? Yes

Date added to Forward Plan of Key Decisions if a Key Decision: 23 August 2023

EXECUTIVE SUMMARY / INTRODUCTION FROM CABINET MEMBER

This reports sets out recommendations to adopt the Coastal Adaptation Supplementary Planning Document, which supports the implementation of policies relating to development within the borough's Coastal Management Area, and rollback and relocations away from the coast in the Great Yarmouth Local Plan.

RECOMMENDATIONS :

That Cabinet :

1. Adopts the Coastal Adaptation Supplementary Planning Document (included as Appendix 1 to this report); and
2. Delegates authority to the Strategic Planning Manager, in consultation with the Cabinet Member for Economic Development & Growth, to make any presentational or typographical amendments to the Coastal Adaptation Supplementary Planning Document prior to it being published.

1. Introduction

- 1.1. Supplementary Planning Documents (SPDs) build upon and provide more detailed advice or guidance on policies in an adopted Local Plan. They do not form part of the 'Development Plan' but are a material consideration in the determination of planning applications. The Coastal Adaptation SPD will provide guidance for developers related to development within the borough's Coastal Management Area, and for potential rollback and relocation proposals away from the coast.
- 1.2. The Coastal Adaptation SPD has been prepared by a partnership of Great Yarmouth Borough Council, East Suffolk Council, North Norfolk District Council, The Broads Authority (The Broads), with the support of Coastal Partnership East. These authorities and Coastal Partnership East are signatories to the 'Norfolk and Suffolk Coastal Authorities Statement of

Common Ground on Coastal Zone Planning’ (July 2018), which recognises the importance of cross boundary working in relation to coastal management. The Coastal Adaptation SPD is an example of cross boundary working to support the common goal of coastal adaptation.

- 1.3. The Town and Country Planning (Local Planning) Regulations 2012 require two stages of consultation during the preparation of a Supplementary Planning Document. The first initial draft consultation to inform the scope and content of the SPD took place between 4 September and 16 October 2020. Following endorsement of the final draft Coastal Adaptation SPD by the Policy & Resources Committee on 6 December, a consultation took place over 6 weeks between 25 January and 8 March 2023.
- 1.4. A Consultation Statement has been prepared and is appended to this report as Appendix 2 which includes the responses received at both stages of consultation and how they have been addressed in the final version of the Supplementary Planning Document.
- 1.5. The final version of the Coastal Adaptation SPD that is to be adopted by Cabinet is provided in Appendix 1 to this report.

2. Final Coastal Adaptation SPD for adoption

- 2.1. Through the final draft consultation, the Coastal Adaptation SPD received responses from over 50 individuals/organisation, many submitting multiple representations for consideration. In summary the main changes from the final draft include:
 - Clarifying that the SPD does not explicitly address flood risk (which is assessed through other planning policies)
 - Clarifying that the SPD cannot alter planning policies contained in a Local Plan, nor alter coastal management approaches for any stretch of coastline in the Shoreline Management Plan
 - Clarifying that the SPD cannot address Nationally Significant Infrastructure Projects, where are determined by the relevant Secretary of State
 - Placing greater emphasis on the sensitive landscape and wildlife environmental along large parts of the coast
 - Ensuring that development at or near the coast should not hinder opportunities to realign the England Coast Path
 - Increasing the approximate distances that development may be relocated away from a settlement
 - Generally avoiding jargon and technical language where possible, but acknowledging that some technical language may be necessary in some circumstances.
- 2.2. No representations were made in respect of the Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) Regulations Screening Assessment, which was also subject to consultation. This means that the Council can adopt the Screening Reports to meet the relevant SEA and HRA regulations.

3. Financial Implications

- 3.1. No implications. The costs associated with the preparation of the SPD has been resourced through the Strategic Planning budget. The joint production of the document has saved on officer resources.

4. Risk Implications

- 4.1. The risks in adopting the SPD are limited. By not adopting the SPD there would be a missed opportunity to provide further clarification on the requirements of existing planning policies and ultimately support effective implementation of them.

5. Legal Implications

- 5.1. The powers to prepare an SPD are outlined within the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) Regulations 2012 and the process of preparing the SPD has been in accordance with these regulations.
- 5.2. The Coastal Adaptation SPD has been subject to a Strategic Environmental Assessment Screening Statement (Appendix 3) in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended). It has also been subject to a Habitats Regulations Assessment Screening Statement (Appendix 4) in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended). An Equality Impact Assessment Screening Opinion (Appendix 5) was produced to meet the requirements of the Equality Act 2010.

6. Conclusion

- 6.1. That Cabinet:
 1. Adopts the Coastal Adaptation Supplementary Planning Document (included in Appendix 1 of this report); and
 2. Delegates authority to the Strategic Planning Manager, in consultation with the Cabinet Member for Economic Development & Growth and Tourism, to make any presentational or typographical amendments to the Coastal Adaptation Supplementary Planning Document prior to being published.

7. Appendices

Appendix 1 – Coastal Adaptation Supplementary Planning Document (adoption version)

Appendix 2 – Consultation Statement

Appendix 3 – Strategic Environmental Assessment Screening Statement

Appendix 4 – Habitat Regulations Assessment Screening Statement

Appendix 5 – Equalities 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?

Consultations	Comment
Monitoring Officer Consultation:	Through Executive Leadership Team – 13 th September 2023
Section 151 Officer Consultation:	Through Executive Leadership Team – 13 th September 2023
Existing Council Policies:	Local Plan Part 1 Core Strategy, Local Plan Part 2
Equality Issues/EQIA assessment:	EqIA Screening Opinion undertaken – see Appendix 5

Coastal Adaptation Supplementary Planning Document

September 2023



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1 Introduction

1.1 The Coastal Adaptation Supplementary Planning Document (SPD) has been prepared by a partnership of East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority (The Broads), and the shared Coastal Partnership East team¹. The purpose of the SPD is to provide guidance on the implementation of local plan policies along the coast from Holkham in Norfolk to Landguard Point, Felixstowe in Suffolk. The SPD achieves this by providing guidance on:

- Development within the Coastal Change Management Area (CCMA);
- Rollback and relocation of development away from the CCMA;
- Enabling development; and
- Case study examples of coastal adaptation best practice.

1.2 The SPD cannot:

- Conflict with planning policies nor can it prescribe that particular areas of land be developed for particular uses; this is the role of the wider development plan (e.g. local plan and neighbourhood plan) for each local planning authority;
- Create new, amend or revoke coastal management policies concerning the management of each stretch of coast relevant to the SPD contained in Shoreline Management Plans;
- Address Nationally Significant Infrastructure Projects (NSIPs) – Large scale infrastructure development that is not determined by local planning authorities but by HM Government;
- Address nationally permitted development rights – Development that does not require planning permission by virtue of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended; or
- Address wider support for or calls for compensation arising from properties and/or land at risk of coastal change – with the exception of houses owned before 2009, where a Government grant for surveys/demolition may be available.

1.3 The SPD does not:

- Address flood risk - Assessed through the use of site specific flood risk assessments relating to local and national flood risk planning policies (see paragraphs 3.25-3.26 for more information).

1.4 An initial consultation was held between 4 September 2020 and 16 October 2020, and a formal consultation on the draft SPD between 25 January and 8 March 2023. The responses received have helped to prepare this document. The SPD is a material consideration in determining planning applications, and supersedes the Waveney District Council Development and Coastal Change SPD

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

(2013)² and the North Norfolk District Council Development and Coastal Erosion Development Control Guidance (2009)³.

- 1.5 While 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 local planning authority and Coastal Partnership East will always be encouraged to maximise opportunities and manage risks to life and property in a timely manner.

² <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/supplementary-planning-documents/>

³ <https://www.north-norfolk.gov.uk/info/planning-policy/current-local-plan/coastal-erosion-development-control-guidance/>

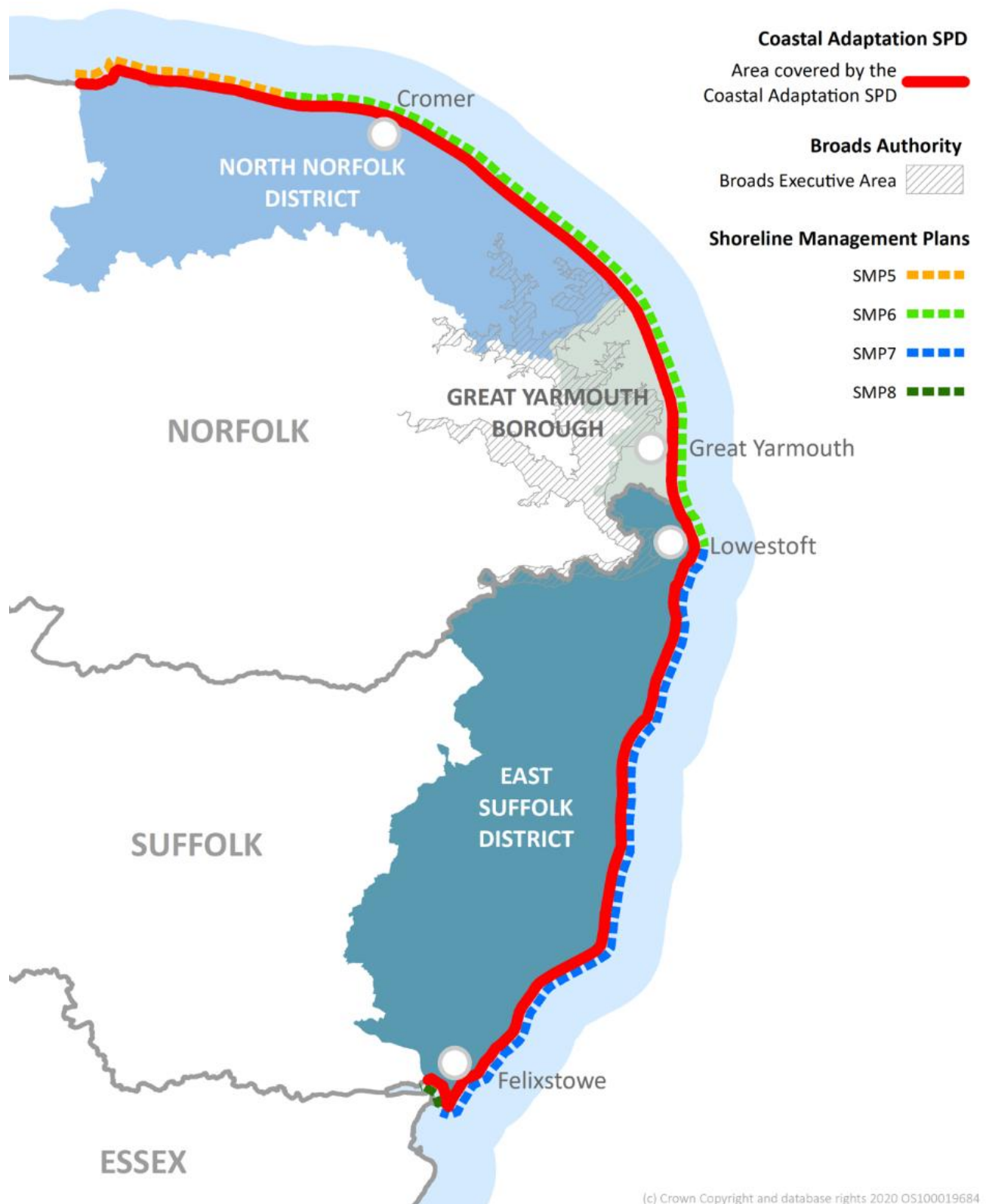


Figure 1 - The area to which the SPD applies

2 Context: Homes, Businesses, Communities, and Environment affected by Coastal Change

2.1 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 does climate change affect the coast?

What are the coastal processes and geology affecting the coast?

- 2.2 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 underlying geology 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.
- 2.3 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 (gain of land through the deposition of sediment) occurs, which can present a variety of challenges and opportunities for coastal communities, and the environment. Coastal processes are natural processes driven by geology, tides, weather and climate change that affect the coast in a variety of ways.

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

- 2.4 The rich and diverse Norfolk and Suffolk coast, offers a variety of opportunities, whether they benefit the environment, communities, and/or businesses.
- 2.5 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.
- 2.6 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, refreshments and lifeboat station in rough seas.

- 2.7 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 coastal risk management. Sediment generally moves from north to south along the shore, although this can vary locally. Beaches are an important aspect of coastal risk management 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 risk management structures 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.
- 2.8 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 does climate change affect the coast?

- 2.9 The risks of climate change-enhanced coastal erosion are recognised in the UK Climate Change Risk Assessment (2022)⁴, the Government's National Flood and Coastal Erosion Risk Management Policy Statement (2020)⁵, the Environment Agency's National Flood and Coastal Erosion Risk Management Strategy (2020)⁶, and the Committee on Climate Change's 'Managing the Coast in a Changing Climate' report (2018)⁷. These publications cite evidence of, and recent projections for a changing climate, and coastal erosion implications.
- 2.10 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, for example degradation through storm surge damage, is also a key impact. The extreme and accelerating nature of climate change is also increasing the uncertainty about the accuracy of coastal change predictions, which emphasises the importance of taking an appropriate approach to the application of climate change data.



Stormy sea at Gorleston Harbour looking towards Great Yarmouth with Scroby Sands windfarm in the background.

⁴ <https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2022>

⁵ <https://www.gov.uk/government/publications/flood-and-coastal-erosion-risk-management-policy-statement>

⁶ <https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2>

⁷ <https://www.theccc.org.uk/publication/managing-the-coast-in-a-changing-climate/>

- 2.11 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.
- 2.12 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 and species.
 - Increased risk of loss of land for recreational activities.
 - 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, and sensitive habitats.
- 2.13 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.

3 Coastal Management Measures and Policies

Introduction

- 3.1 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 (Appendix 1). 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 England⁸.
- 3.2 This chapter provides an overview of coastal management and planning policy at the national, local and neighbourhood scales. 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.

⁸ <https://www.gov.uk/government/publications/a-coastal-concordat-for-england>

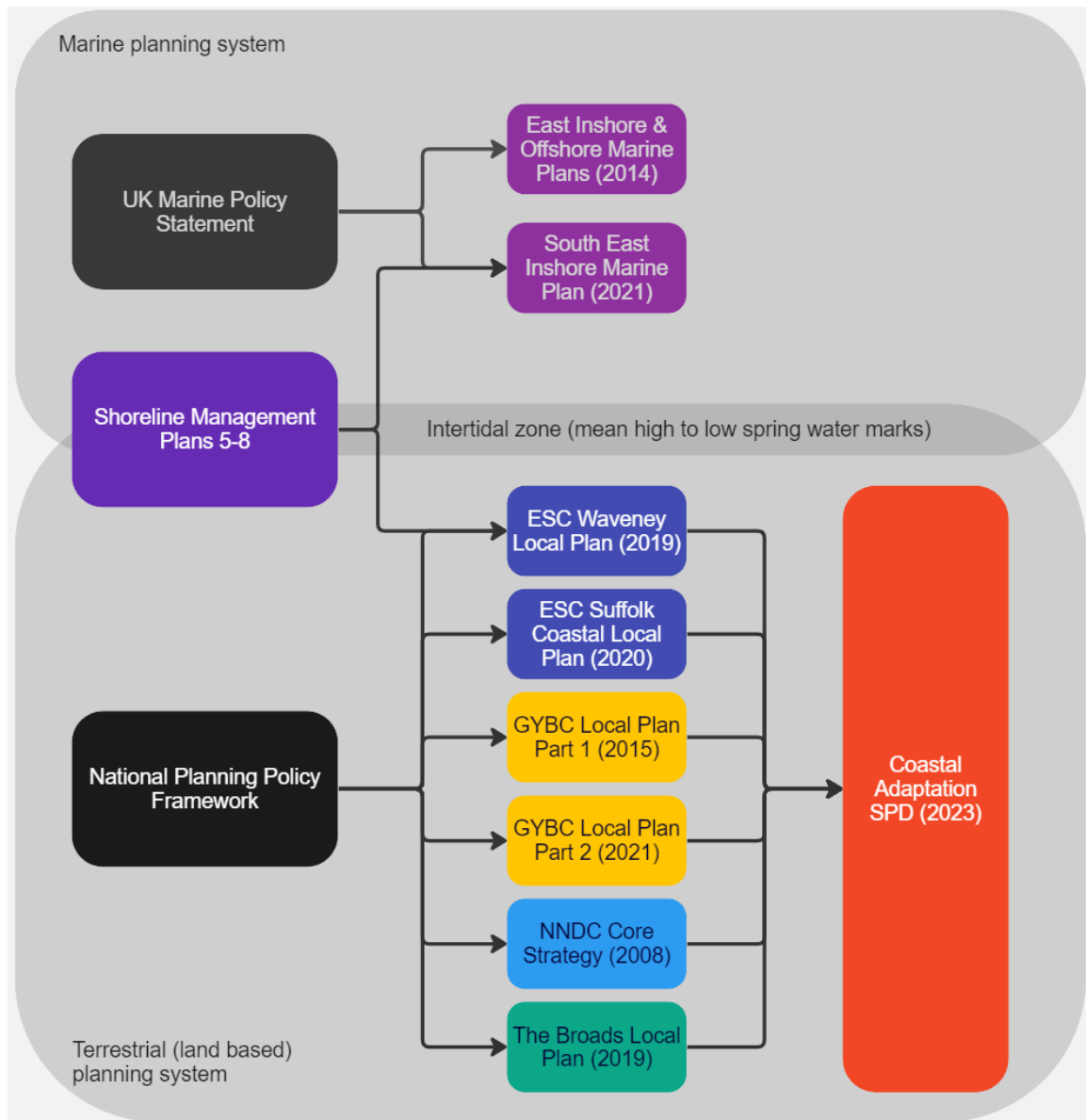


Figure 2: Flowchart showing the relationship between national and local coastal planning and planning related documents⁹

National Policy and Guidance

- 3.3 The Government's Flood and Coastal Erosion Risk Management Policy Statement¹⁰ sets out the 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 Strategy¹¹ provides a framework for guiding the operational activities and decision making of practitioners supporting the direction set by government policy. The key objectives

⁹ Once adopted, the emerging NNDC Local Plan will supersede the NNDC Core Strategy 2008

¹⁰ <https://www.gov.uk/government/publications/flood-and-coastal-erosion-risk-management-policy-statement>

¹¹ <https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2>

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.

- 3.4 The Environment 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 Environment 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.
- 3.5 The ICZM approach is carried into the National Planning Policy Framework (NPPF)¹², which sets the Government's planning policies at the national level. Local Plans, which set the planning policies for local planning authority areas, must be consistent with the policies set out in the NPPF. Thus, Local Plan policies must be consistent with the Government's ICZM approach.
- 3.6 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 likely to be affected by physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion. This SPD covers areas at risk of erosion and coastal landslip.
- 3.7 The Planning Practice Guidance (PPG) for Flood Risk and Coastal Change¹³ 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.
- 3.8 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 planning¹⁴ is governed by the Government's UK Marine Policy Statement¹⁵ and the Marine Management Organisation's (MMO) Marine Plans. The Marine Policy Statement provides the national framework for the preparation of Marine Plans and decision making affecting the marine environment. 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 Marine Policy Statement 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)¹⁶ – covering Flamborough Head to Felixstowe
 - South East Inshore Marine Plan (2021)¹⁷ – covering Felixstowe to West of Dover

¹² [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/national-planning-policy-framework)

¹³ <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

¹⁴ 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)

¹⁵ <https://www.gov.uk/government/publications/uk-marine-policy-statement>

¹⁶ [East Marine Plans - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/east-marine-plans)

¹⁷ [The South East Marine Plan Documents - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/south-east-marine-plan)

- 3.9 A marine licence¹⁸ may be required for any relevant developments which may impact the marine environment, such as coastal risk management structures. Section 58 of the Marine and Coastal Access Act 2009 requires local planning authorities to, in carrying out their authorisation and enforcement functions, do so in accordance with the relevant Marine Plan/s unless material considerations indicate otherwise.
- 3.10 The coast is home to a large number of natural and historic environment statutory and non-statutory designations, from large scale Special Areas of Conservation to small listed buildings. These statutory and non-statutory designations are often susceptible to coastal change which can result in loss of part of or 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

- 3.11 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 Shoreline Management Plan policies are¹⁹:
- Identify opportunities to maintain and improve the environment by managing the risks from floods and coastal erosion;
 - Identify the preferred policies for managing risks from floods and erosion over the next century;
 - Identify the consequences of putting the preferred policies into practice;
 - Set out procedures for monitoring how effective these policies are;
 - Inform stakeholders so that future land use, planning and development of the shoreline takes account of the risks and the preferred policies;
 - Discourage inappropriate development in areas where the flood and erosion risks are high; and
 - Meet international and national nature conservation legislation and aim to achieve the biodiversity objectives.
- 3.12 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;

¹⁸ 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/marine-plans)

¹⁹

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69206/pb11726-smpg-vol1-060308.pdf

- 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.

3.13 Coastal processes 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.



Risk Management Structure/rock berm at Happisburgh with cliff erosion shown.

3.14 Shoreline Management Plans (SMP) provide coastal authorities with an opportunity to assess the risks associated with coastal processes, the long-term implications for managing the coast, and set out the coastal management policy for the short (up to 20 years), medium (20-50 years) and long (50-100 years) term across each stretch of the coast. The eastern half of SMP5 (Hunstanton to Kelling Hard)²⁰, SMP6 (Kelling Hard to Lowestoft Ness)²¹, SMP7 (Lowestoft Ness to Felixstowe Landguard Point)²², and the northern most point of SMP8 (Landguard Point to Two Tree Island)²³ cover the coastal area to which

²⁰ [Shoreline Management Plan 5 \(Hunstanton to Kelling Hard\)](#)

²¹ [Shoreline Management Plan 6 \(Kelling Hard to Lowestoft Ness\)](#)

²² [Shoreline Management Plan 7 \(Lowestoft Ness to Felixstowe Landguard Point\)](#)

²³ [Shoreline Management Plan 8 \(Landguard Point to Two Tree Island\)](#)

this SPD relates. These SMPs form the evidence base for the identification of the CCMA within each of the Partnership Authorities' Local Plans, except the Broads, and are mapped on their respective Local Plan Policies Maps²⁴. The three erosion risk areas (short, medium, and long term time periods) 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 the relevant SMP. This information will provide a valuable insight for those seeking to understand the development options for a given area of land.

- 3.15 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 showing old sea defences.

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

²⁴ 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>

- East Suffolk Council Suffolk Coastal Local Plan (adopted 2020)²⁵
- East Suffolk Council Waveney Local Plan (adopted 2019)²⁶
- Great Yarmouth Local Plan Part 1 (adopted 2015)²⁷
- Great Yarmouth Local Plan Part 2 (adopted 2021)²⁸
- North Norfolk Core Strategy (adopted 2008)²⁹
- The Broads Local Plan (adopted 2019)³⁰

3.17 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 SPD is intended to also provide guidance in relation to the emerging North Norfolk District Council Local Plan³¹, which has reached an advanced stage where weight can be given in accordance with paragraph 48 of the NPPF.

3.18 Neighbourhood Plans can be most easily understood as smaller scale Local Plans, usually 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. More information about neighbourhood planning is available in Appendix 6 (Neighbourhood Plan Guidance) and on the relevant local planning authority website³².

Local Plan policies

3.19 This section highlights the key Local Plan policies addressing coastal planning matters within the partnership authorities' Local Plans.

3.20 The following policies identify the CCMA and the circumstances whereby development may be acceptable within the CCMA:

- East Suffolk Council Suffolk Coastal Local Plan policy SCLP9.3 (Coastal Change Management Area)
- East Suffolk Council Waveney Local Plan policy WLP8.25 (Coastal Change Management Area)
- Great Yarmouth Local Plan Part 2 policy GSP4 (New Development in Coastal Change Management Areas)

²⁵ <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/>

²⁶ <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/>

²⁷ <https://www.great-yarmouth.gov.uk/article/2489/Current-Local-Plan>

²⁸ <https://www.great-yarmouth.gov.uk/article/2489/Current-Local-Plan>

²⁹ <https://www.north-norfolk.gov.uk/tasks/planning-policy/core-strategy/>

³⁰ <https://www.broads-authority.gov.uk/planning/planning-policies/development>

³¹ <https://www.north-norfolk.gov.uk/tasks/planning-policy/local-plan-new/>

³² <https://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/>

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

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

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

- North Norfolk Core Strategy policy EN11 (Coastal Erosion), the CCMA is referred to as the Coastal Erosion Constraint Area.

- 3.21 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.
- 3.22 The above policies, except Broads Local Plan policy SSCOAST (The Coast), also require Coastal Erosion Vulnerability Assessments (CEVA) to support relevant planning applications. North Norfolk 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.
- 3.23 The following policies support rollback and relocation of development at risk from coastal change:
- East Suffolk Council Suffolk Coastal Local Plan policy SCLP9.4 (Coastal Change Rollback or Relocation)
 - East Suffolk Council Waveney Local Plan policy WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion)
 - Great Yarmouth Local Plan Part 2 policy E2 (Relocation from Coastal Change Management Areas)
 - North Norfolk Core Strategy policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk).
- 3.24 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.

Flood risk

- 3.25 Flood risk and coastal erosion risk can be heavily interrelated; however, the focus of the SPD is on existing and future development at risk of coastal erosion through the application of the above local plan policies.
- 3.26 In addition to the NPPF, the partnership authorities' local plans also contain flood risk policies which address all sources of flooding, including from rivers and sea. Any proposed development at risk of flooding from any source (e.g. sea, river, or other source) would need to be supported by a site-specific flood risk assessment to help establish whether the development should be granted planning permission. To avoid duplicating the assessment of flood risk, this SPD provides guidance on the implementation of coastal planning policies and primarily the impact of coastal erosion on existing and future development. No further guidance on flood risk matters is set out in the SPD.

4 Development in the Coastal Change Management Area

Introduction

- 4.1 This chapter provides guidance regarding the circumstances in which development may be appropriate within the Coastal Change Management Area (CCMA) across the relevant local authorities³³. 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 development and guiding appropriate development within the CCMA.
- 4.2 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 20 years), medium (20-50 years) and long (50-100 years) 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. 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 indicative overall extent of erosion for each epoch, but for example, it would be wrong to infer that halfway through a particular epoch the erosion will extend to half of the risk area.
 - In order to effectively manage the inherent unpredictability of coastal change, the following buffer areas (risk zones) have been added to the evidenced erosion risk areas. Within these risk zones a Coastal Erosion Vulnerability Assessment will often be required to support a relevant planning application (as set out in Table 2) and demonstrate that the development will not result in an increased risk to life or property.
 - East Suffolk Council and Great Yarmouth Borough Council apply a 30 metre risk zone landward of areas identified as a CCMA or Hold The Line (HTL) areas in order to ensure that developments take account of the coastal erosion risk in the general vicinity. Within HTL areas the 30 metre risk zone should be measured from the landward edge of the risk management structure.
 - North Norfolk District Council do not apply buffer areas to the CCMA within their adopted Core Strategy. However, their emerging Local Plan applies a 30 metre risk zone

³³ 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

landward of HTL areas, which should be measured from the landward edge of the risk management structure.

- Through the Suffolk Coastal Local Plan, East Suffolk Council applies a 60m risk zone to the landward edge of risk management structures in areas of soft cliffs where geological information indicates that risk management structures would likely be adversely affected by development. Within the 60m buffer area/risk zone, Coastal Partnership East should be consulted to consider whether a Coastal Erosion Vulnerability Assessment should be undertaken.
- 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 updated, revised and adopted erosion risk mapping, which takes into account likely climate change scenarios. 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

- 4.3 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 (Table 1) other considerations, such as the scale of development, its extent, and permanence amongst other matters will be of particular relevance when considering the degree of significance in terms of risk and consequently its appropriateness.
- 4.4 Essential infrastructure 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.
- 4.5 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;
 - Coastal erosion risk management structures;
 - Wind turbine infrastructure.

- 4.6 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 (up to 20 years 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-years) and long-term (50 to 100-years) 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 economic and social to the community benefits (the PPG expects these benefits to be substantial)³⁴, 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.
- 4.7 East Suffolk Council, Great Yarmouth Borough Council and North Norfolk District Council have identified CCMA's in their adopted and emerging Local Plans and mapped these on associated Policies Maps, where the respective coastal planning policies set out the principle of development within the CCMA's. An applicant should refer to the relevant:
- Policies Map in order to ascertain in which, if any, of the CCMA risk areas the proposed development site is located;
 - SMP to understand the erosion risk on the relevant stretch of coast; and
 - Local Plan coastal policies to understand how a planning application would be assessed.
- 4.8 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.
- 4.9 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.
- 4.10 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.

³⁴ Planning Practice Guidance Paragraph: 073 Reference ID: 7-073-20220825 Revision date: 25 08 2022



Cliffs at Corton ©Environment Agency, 2011

Development Type	Short term (up to 20 years) ³⁵	Medium term (20-50 years)	Long term (50-100 years)	Notes
Permanent residential development, including replacement dwellings or change of use to a permanent dwelling	No	No	No	Not permitted within the CCMA. See paragraphs 4.11 and 4.12 for more information.
Non-residential development <ul style="list-style-type: none"> Permanent non-residential development Intensification of use Redevelopment or reconfiguration of existing uses Replacement of development affected by coastal change 	No	Possibly	Possibly	Assessment will take account of CEVA information, proposed use, and planning conditions are likely to be added. See paragraphs 4.13-4.19 for more information.
Temporary development	Possibly	Yes	Yes	Assessment will take account of CEVA information and time-limited conditions will be added to a planning consent. See paragraphs 4.20-4.24 for more information.
Open land uses (i.e. no buildings)	Yes	Yes	Yes	Assessment will take account of CEVA information and time-limited conditions may be added to a planning consent. See paragraph 4.25 for more information.
Changes of use (non-residential)	Possibly	Possibly	Possibly	Assessment will take account of CEVA information and time-limited conditions may be added to a planning consent. See paragraphs 4.26 and 4.27 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 paragraphs 4.28 and 4.29 for more information.
Essential infrastructure and community uses	Possibly	Possibly	Possibly	Assessment will take account of CEVA information. See paragraphs 4.30 and 4.31 for more information.

Yes	Development will be acceptable subject to other local plan policies and any material considerations. 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

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

³⁵ The 20/20-50/100-year time frames will be measured from the date on which the Coastal Erosion Vulnerability Assessment (CEVA) is completed.

Permanent residential development

- 4.11 Each of the participating Local Planning Authorities, other than the Broads Authority, have adopted and emerging local plan coastal policies that preclude planning permission for permanent new residential development within the identified CCMA. This also includes any proposals for 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.
- 4.12 If non-permanent residential development/use is being proposed, an applicant should refer to the temporary and time-limited development/uses section.

Permanent non-residential development

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

Intensification of use (non-residential)

- 4.15 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.
- 4.16 For intensification of the use of properties within the risk zone associated with the first epoch (up to 20 years) to be appropriate, an applicant will need to 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)

- 4.17 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 relevant guidance relating to extensions or intensification (as appropriate) would apply.

Replacement of development affected by coastal change (non-residential)

- 4.18 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.
- 4.19 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.

Temporary development

- 4.20 Temporary development within a CCMA relates to development proposals that require 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.
- 4.21 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 development will often be considered as an appropriate response to coastal change and can help facilitate 'adaptation' to change. Also, as stated in the PPG³⁶, '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 uses include, but are not limited to, use of land for caravans, mobile homes, temporary

³⁶ <https://www.gov.uk/guidance/flood-risk-and-coastal-change> - Paragraph: 074 Reference ID: 7-074-20220825 (Revision date: 25 08 2022)

structures and land for open storage. In addition, some types of non-permanent residential development could be acceptable.

- 4.22 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 need to be balanced in relation to the longer-term sustainability of that community.
- 4.23 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.
- 4.24 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 when they are preparing a CEVA.

Open land uses

- 4.25 Open land uses (uses with no buildings) are likely to be appropriate within the CCMA and indeed may be encouraged as part of the implementation of 'rollback' proposals and could provide benefits such as biodiversity net gain or habitat creation or replacement.

Changes of use

- 4.26 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 to limit the lifetime of the new use.
- 4.27 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)

- 4.28 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 size of the property or life put at risk and possibly the expected life of the property.
- 4.29 For extensions to properties within the risk zone associated with the first epoch (up to 20 years risk area), an 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 is likely to be whether the proposed extension is clearly subordinate to the existing property or building.

Essential infrastructure and community uses

- 4.30 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 removal of any structures at the appropriate time.
- 4.31 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)

- 4.32 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.
- 4.33 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.

4.34 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 complaint CEVA with the submission of a planning application, applicants are advised to consider pre-application advice from the relevant local planning authority.

4.35 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 (including any new and/or altered servicing infrastructure) 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 (including any new and/or altered servicing infrastructure) will not increase the risk of coastal erosion elsewhere, for example from increased groundwater and surface water run-off, resulting in cliff destabilisation. Infiltration may therefore not be possible or desirable in all circumstances. Early engagement with the Lead Local Flood Authority (Suffolk County Council³⁷ or Norfolk County Council³⁸) and/or relevant surface water drainage expert will be necessary to ensure surface water can be managed without increasing risk to life or property;
- has demonstrated that the development (including any new and/or altered servicing infrastructure) 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 (including any new and/or altered servicing infrastructure) 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.

4.36 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 years³⁹. 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.

³⁷ <https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage>

³⁸ <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management>

³⁹ As evidenced at paragraph 006 of the Flood Risk and Coastal Change PPG:
<https://www.gov.uk/guidance/flood-risk-and-coastal-change>

- 4.37 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.
- 4.38 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.
- 4.39 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.
- 4.40 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 Table 2 CEVA matrix for development types.

Local Plan	Location on the coast	Permanent residential development	Non-residential development	Temporary development & uses (e.g. caravans)	Extensions to existing development	Modifications to existing development
East Suffolk Council (Suffolk Coastal Local Plan)	Within CCMA	Not permitted	Level B	Level B	Level A	Level A
	CCMA or Hold The Line areas +30m risk zone ⁴⁰	Level B	Level A	Level A	Level A	Level A
	60m risk zone landward of coastal risk management structures in areas of soft cliffs ⁴¹	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 A	Level A
	CCMA (includes Hold The Line areas) +30m risk zone	Level B	Level A	Level A	Level A	Level A
Great Yarmouth Borough Council (Great Yarmouth Local Plan Part 2)	Within CCMA	Not permitted	Level B	Level B	Level A	Level A
	CCMA (includes Hold The Line areas) +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) ⁴²	Not permitted	Level B	Level B	Level A	Level A
North Norfolk District Council (emerging Local Plan)	Within CCMA	Not permitted	Level B	Level B	Level A	Level A
	30m risk zone in Hold The Line areas	Level B	Level A	Level A	Level A	Level A

Table 2: Coastal Erosion Vulnerability Assessment matrix for development types. Note: Red colour = will not be permitted, Amber colour = possibly acceptable and Level B CEVA required, Green colour = possibly acceptable and Level A CEVA required.

⁴⁰ The 30m risk zone, or buffer area, should be measured from the CCMA, or in Hold the Line areas from the landward edge of coastal risk management structures.

⁴¹ 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 risk management structures are likely to be adversely affected by development.

⁴² 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.

- 4.41 The different types of development identified in the above CEVA matrix are defined in the above section, from paragraph 4.12. Where a type of development is not included in Table 2 above, advice should be sought from the relevant planning authority.

Level A CEVA

- 4.42 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

- 4.43 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.

- 4.44 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.

- 4.45 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.

- 4.46 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. Further information or greater detail may be necessary for some types of development.

5 Rollback and Relocation

Introduction

- 5.1 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. Coastal change can have a direct effect upon the health and wellbeing and long-term sustainability of affected coastal communities, for example through the erosion and loss of land, to the potential effects emanating from 'blight' and a reduced desire to invest in those properties and the wider area.
- 5.2 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.
- 5.3 In response, each planning authority⁴³ 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.
- 5.4 The relevant policies with respect to rollback and relocation from each Local Plan⁴⁴ are set out below:
- East Suffolk Council Suffolk Coastal Local Plan policy SCLP9.4 (Coastal Change Rollback or Relocation)
 - East Suffolk Council Waveney Local Plan policy WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion)
 - Great Yarmouth Local Plan Part 2 policy E2 (Relocation from Coastal Change Management Areas)
 - North Norfolk Core Strategy policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk) and policy CC6 (Coastal Change Adaptation) of the emerging Local Plan.
- 5.5 This chapter provides further detail and guidance on the interpretation of the above policies, 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 is eventually eroded.
- 5.6 It is important to note that the Government does not offer compensation for properties lost as a result of coastal change. Compensation is therefore not a matter which can be considered under planning

⁴³ The Broads Local Plan does not include any policies relating to rollback and relocation

policy. Some government funding can be accessed to assist with demolition of residential properties under a Coastal Assistance Grant, but only if they were purchased before 15 June 2009.

Residential land-uses affected by coastal erosion

- 5.7 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.
- 5.8 When identifying alternative areas or land to enable sites to rollback 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.

General locational principles

- 5.9 The North Norfolk (EN12) and Great Yarmouth (E2) Local Plan policies are broadly similar in their approach when guiding alternative areas or land to enable sites to rollback 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). 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.
- 5.10 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.
- 5.11 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 boundaries⁴⁵, 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.
- 5.12 In simple terms this means that in interpreting the policy, the applicant will need to clearly demonstrate that the occupiers of the rollback or relocated dwelling will not be disadvantaged with respect to accessing facilities (e.g. primary school, food shop, bus services, employment opportunities etc) than

⁴⁵ Equivalent term to development limits or development boundary

the location the original dwellings was in; and where possible, demonstrate an improved level of access to such facilities.

- 5.13 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.
- 5.14 The locational principles of relocated properties also need to consider how it would relate to 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.
- 5.15 Various other elements of the appropriateness of relocation sites should be considered too, particularly including, but not necessarily limited to, the potential impact on listed buildings, conservations area, flood risk, nature conservation, as well as the application of relevant neighbourhood planning policies.

Size of replacement/relocated properties

- 5.16 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 Suffolk Coastal Local Plans or the emerging North Norfolk Local Plan, 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.
- 5.17 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 Authority 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.
- 5.18 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.
- 5.19 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

- 5.20 The relevant Local Plan policies are intended to aid coastal business owners and commercial operators to make longer-term decisions about investment and growth. The value of retaining or protecting existing businesses and their employees (and supply chain, as relevant) to local communities can be considerable, in both economic and social terms. For obvious operational and business reasons, however, it will not always be practicable to relocate some businesses to sites outside the Coastal Change Management Area (for example, a tourism business that relies on its seaside location).
- 5.21 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).
- 5.22 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 (albeit perhaps at a lower level of intensity). 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 income before the new site is fully established.
- 5.23 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 risk 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.
- 5.24 Where relocation to a new site is necessary, this should normally be located where it is accessible (or well-related⁴⁶) 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 2km away from the existing community and with appropriate highway links for vehicular and non-vehicular traffic. It is recognised, however, that the scale and type of particular businesses may necessitate further flexibility on relocation sites, with decisions being made on a case-by-case basis.
- 5.25 As with residential developments, many potential relocation sites are likely to be within one of the AONBs. Proposed relocation sites will therefore need to consider their potential landscape impacts, in

⁴⁶ As per North Norfolk Local Plan Policy EN11

line with the relevant Local Plan policies and the NPPF. It is recognised that, in some cases, the relocation site may be in a less sensitive part of the AONB than the original site, so potentially reducing the net level of harm to the AONB.

- 5.26 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 often they are on undefended stretches of the coast.
- 5.27 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 – 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.
- 5.28 New development should not hinder future realignment of the England Coast Path and should seek to proactively provide future options for realignment of this path and other public access. Other public access (e.g. rights-of-way) should also be considered, including safeguarding/improving existing and relocating/creating new ones, as appropriate.
- 5.29 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.
- 5.30 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).
- 5.31 The loss of agricultural land to erosion is not compensated financially by the Government. However, some permitted development rights for agricultural buildings and operations exist and these can be used, as appropriate. Where (for example) a barn used to store machinery is at high risk of being lost and it needs to be relocated/replaced elsewhere, in a location at lower risk, this would be given favourable consideration.
- 5.32 Where infrastructure is proposed to be relocated, appropriate consideration should be given to potential relocation alternatives. In some cases, there may be only one main option (perhaps for operational reasons) but in most cases costs and environmental considerations will also be significant. All opportunities to ‘climate-proof’ such relocations as much as possible (i.e. make them resilient to

future climate change) should be taken. In all cases, the clear rationale for the proposed relocation option/choice should be set out, with consideration of alternatives also detailed. Early discussions with the relevant Local Planning Authority should take place, along with any other relevant bodies, such as the Marine Management Organisation and the Environment Agency.



Habitats affected by coastal erosion

- 5.33 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 Areas and Special Areas of Conservation. These are defined as sites of highest international importance for birds, flora and fauna.
- 5.34 All of the respective local planning authorities across the SPD area have a statutory duty under the Countryside and Rights of Way Act 2000 to protect these along with other nationally and internationally designated sites.
- 5.35 However, it is not possible to protect all nationally/internationally important habitats and species from the effects of coastal erosion. Natural 'rollback' of habitats is not always possible either (due to the presence of built development, for example) – and there is no requirement to provide compensatory habitat in this context. Identifying/safeguarding any potential habitat rollback land is not within the scope of the SPD to secure/protect, but any such appropriate proposals would be strongly encouraged. New/expanded saltwater marshes may be one such example; inter-tidal and wetland habitats are

particularly rich and important in Norfolk and Suffolk, both for biodiversity and also, to some extent, as erosion protection.

- 5.36 Development on residential rollback sites may provide opportunities to introduce biodiversity net gain, such as the planting of trees, new heathland etc, which are important in their own right, but they also help 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

- 5.37 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; if removal of structures is not considered practicable, at least they should be made safe/de-connected (or similar). Where materials or below ground structure remain, a monitoring and removal plan (from the beach) may be needed.
- 5.38 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.
- 5.39 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.
- 5.40 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.
- 5.41 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.
- 5.42 Irrespective of the grant or funding model used, planning permissions granted for time-limited uses must include conditions tied to a Section 106 Agreement setting out the future site management and demolition requirements at an agreed date.

- 5.43 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 be 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. Sites might be able to be transferred to the relevant local authority or parish council, but this would be dependent on private negotiations (on matters like costs and liabilities).

Acquisition of land for relocation and rollback

- 5.44 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.
- 5.45 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 in Appendix 4 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.
- 5.46 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.
- 5.47 Coastal Partnerships East (CPE) secured significant funding from Defra as part of the Flood and Coastal Resilience Innovation Programme⁴⁷ (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.
- 5.48 North Norfolk District Council has been selected to deliver the Coastal Transition Accelerator Programme⁴⁸ (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.

⁴⁷ [Resilient Coasts - Great Yarmouth and East Suffolk | Engage Environment Agency \(engagementhq.com\)](#)

⁴⁸ [North Norfolk Coastal Transition Accelerator Programme \(CTAP\) | Engage Environment Agency \(engagementhq.com\)](#)

6 ‘Enabling’ Development

Introduction

- 6.1 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?

- 6.2 ‘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.
- 6.3 For example (and in a different context), 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.
- 6.4 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

- 6.5 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 ensuring the viability of proposals.
- 6.6 Enabling development could also potentially help fund and facilitate rollback of natural habitats at risk from coastal change.
- 6.7 In relation to the 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 can sometimes be an important element to facilitating the longer-term sustainability of coastal communities. Any proposal considering utilising such an approach should use this SPD guidance and seek further clarification from the relevant local planning authority.

- 6.8 It is not possible for every potential enabling scenario to be covered in this SPD, but the example scenarios given below indicate the key principles.

Example scenarios for enabling development

- 6.9 Enabling development can come in many different forms; the key is to demonstrate the public good of the substantive development outweigh(s) 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 businesses 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;
- Rollback or creation of natural habitats (e.g. creation or expansion of salt marsh), funded by enabling development elsewhere.

Public benefit(s)

- 6.10 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 because every case will, inevitably, be different. The kind of public benefits that may be able to be considered (on a case-by-case basis) are one or more of the following:

Relocating residential dwellings

- 6.11 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.
- 6.12 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.

- 6.13 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 received planning permission in 2022/3 – 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 and facilities

- 6.14 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 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.
- 6.15 In a similar way to tourist 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 (see Appendix 4).

Relocating business premises

- 6.16 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

- 6.17 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 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.

Relocating infrastructure

- 6.18 It would normally be expected that infrastructure providers would cover the costs of any relocation/rollback themselves (for example, the recent Anglian Water relocation inland of sewerage pipes running from Lowestoft to Corton). However, some other infrastructure owners or providers may not have the ability to do this and for them, some enabling development may be considered necessary. Any such proposals would be considered on a case-by-case basis, with the significance of the infrastructure, implications if that infrastructure was damaged or lost, the cost or the rollback and various options/sites for rollback all needing to be considered.

Rollback or creation of natural habitats

- 6.19 Some coastal habitats are being lost to 'coastal squeeze' (where they are eroding but cannot roll back naturally, due to the presence of built development or other factors). There can obviously be public benefits to (re)creating such habitats, including potentially erosion protection (such as salt marshes), tourism (bird-watching, walking etc) and wider biodiversity benefits. If such a proposal was suggested, then the clear public benefits would need to be set out, along with a mechanism for how much enabling development was required and how the enabling funds would be spent on the habitat (re)creation, including (as appropriate) any longer-term maintenance requirements.

Enabling development to implement coastal risk management structures

- 6.20 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.
- 6.21 Any such measures/proposals would need to be in line with the relevant Shoreline Management Plan policy for that particular location, alongside relevant Local Plan policy considerations.
- 6.22 The public benefit of using enabling risk management measures, including structures to increase resilience of properties will be similar to those set out above.
- 6.23 Any such proposals would need to go through the usual planning process and consider and address such issues as impact on protected sites and any potential to make flooding and erosion worse elsewhere along the coast.

Lifespan of the proposed development

- 6.24 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.
- 6.25 New temporary development that only has a short-term temporary public benefit will not usually be acceptable in justifying enabling development.
- 6.26 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.
- 6.27 The Coastal Erosion Vulnerability Assessment (CEVA), as discussed in Chapter 4, will also be required.

Viability and enabling development

- 6.28 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 local planning authority'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.
- 6.29 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.
- 6.30 Any Local Plan policies and guidance relating to viability assessments must be followed.

- 6.31 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

- 6.32 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

- 6.33 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 usually expected to be on the same site of 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 the design of any risk management measures should consider all impacts on the natural beauty of the AONBs and on the Broads, SPA, SAC, Ramsar, SSSIs, and other relevant designations.
 - 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 rollback or relocation.

Agreed Approach

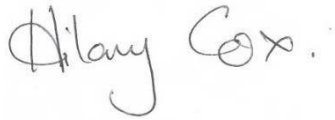
The signatory authorities agree to work together on coastal planning issues to:

- 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 Broad's Authority



Haydn Thirtle
Chair, Broad's 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 (AERFCC)	Regional	Regional Flood and Coastal Committee	Established by the Environment Agency (EA), the AERFCC 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	Local Planning Authority	Prepare Local Plans and Supplementary Planning Documents, support the preparation of Neighbourhood Plans, and determine planning applications.
Coastal Partnership East (CPE) CPE is not an organisation but a shared team across East Suffolk Council (ESC), Great Yarmouth Borough Council (GYBC) and North Norfolk District Council (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, AERFCC and EACG to monitor and oversee Shoreline Management Plan policies.
Department for Environment, Food and Rural Affairs (DEFRA)	National	Government Department	DEFRA provides the lead policy role for coastal erosion risk management.
Department for Levelling Up, Housing and Communities (DLUHC)	National	Government Department	DLUHC provides the lead policy role in coastal erosion planning.
East Anglian Coastal Group (EACG)	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 (ESC)	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.

Organisation	Scale	Role	Responsibilities
		Local Planning Authority	Prepare Local Plans and Supplementary Planning Documents, support the preparation of Neighbourhood Plans, and determine planning applications.
Environment Agency (EA)	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 and provides and maintains flood and coastal risk management structures across large parts of the country.
		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 (GYBC)	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. 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	HM Government of the United Kingdom	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	A special interest group of the national membership body for local authorities in England and Wales	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 (NCC)	Regional	Lead Local Flood Authority	While NCC maintains responsibilities in respect of their status as the Local Highways Authority, Education Authority, and Minerals and Waste Authority, it is their Lead Local Flood Authority responsibilities that are most

Organisation	Scale	Role	Responsibilities
			relevant to this SPD. As the lead local flood authority NCC has the lead operational role in managing the risk of flooding from surface water and groundwater.
North Norfolk District Council (NNDC)	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. 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 (SCC)	Regional	Lead Local Flood Authority	While SCC maintains responsibilities in respect of their status as the Local Highways Authority, Education Authority, and Minerals and Waste Authority, it is their Lead Local Flood Authority responsibilities that are most relevant to this SPD. As the lead local flood authority SCC has 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 Template

1. Name:
.....
2. Agent's Name (if applicable):
.....
3. Development Location/Address:
.....
4. Pre-Application Details:
.....
5. Development Proposal:
.....
6. 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
7. SMP Policy Unit covering the development frontage:
8. Risk Band, please tick as applicable to site:
 - 20 years
 - 50 years
 - 100 years
 - 30m risk zone
 - 30-60m risk zone
9. Development category, please tick one:
 - New non-residential development
 - Temporary buildings, caravans and land uses
 - Extension to existing development
 - Modification of existing development
 - Other

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.

10. Signed by the applicant:

11. Printed Name:

12. Date:

Level B CEVA Template

* 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. Pre-Application Details:
.....
5. Development Proposal:
.....
6. 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
7. SMP Policy Unit covering the development frontage:
8. Risk Band, please tick as applicable:
 - 20 years
 - 50 years
 - 100 years
 - 30m risk zone
 - 30-60m risk zone
9. 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
 - Other

Statement

Please provide detailed answers to the following:

10. What is the nature and scale of the proposed development?
.....

11. What impact will the location of the development have for other properties in the adjacent area?
.....
12. 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?
.....
13. 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?
.....
14. How will the development enhance the ability of communities and the natural environment to adapt sustainably to the impacts of a changing climate?
.....
15. Demonstrate that the development will not affect the stability of the coast or exacerbate the rate of shoreline change.
.....
16. 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.
.....
17. Set out details for managing the development at the end of its planned life.
.....
18. Where appropriate provide evidence of wider sustainability benefits that outweigh the impact of coastal change.
.....
19. Any other relevant information.
.....
20. Signed by the applicant:
21. Printed Name:
22. Date:

Appendix 4 – Case Studies

1. [Broadland Sands Holiday Park, Corton, Suffolk](#)
2. [Beach Road Car Park and Ramp replacement, Happisburgh, Norfolk](#)
3. [Beach Road residential property replacement, Happisburgh, Norfolk](#)
4. [Land West of Little Marl, Trimmingham, Norfolk](#)
5. [Easton Lane Easton Bavents, Reydon, Southwold, Suffolk](#)
6. [Land west of Copperwheat Avenue, Reydon, Suffolk](#)
7. [Seamarge Hotel, Overstrand, Norfolk](#)
8. [Wood Hill Holiday Park, East Runton, Norfolk](#)
9. [Manor Caravan Park, Happisburgh, Norfolk](#)
10. [Corton Pathfinder Scheme, Suffolk](#)

Broadland Sands Holiday Park Corton, Suffolk

Planning Reference: DC/19/ 2949/ COU

Proposal: Use of land for the stationing of static holiday caravans, construction of footway/cycle way, church parking area and associated works

Date of Application: 2019

Date of Permission: 2022

Link to application: <https://publicaccess.eastsuffolk.gov.uk/online-applications/applicationDetails.do?keyVal=PV7DI8QXLID00&activeTab=summary>



Summary

Tourism use but with community benefits including parking for church and public cycle/footpath, which is designed to be rolled back as the cliff erodes.

There was a potential impact to the surrounding landscape and the setting of the Grade I listed church. To address this and following an earlier refusal there was a reduction in caravans and an increase in green spaces and planting.

Details

The existing holiday caravans are very close to the cliff edge due to erosion. Earlier consent was given for smaller rollback scheme within the existing holiday park, but a larger area is needed to accommodate future rollback and growth. To accommodate this the site needs to (partially) relocate to a site to southwest on the western side of the Coast Road and adjoining Stirrups Lane. The scheme includes public walking and cycle ways and provision of parking for the church and green spaces with landscaping.

Consent by SCC Highways to reduce the speed limit from 60mph to 30mph to allow for safe crossing to the main site and for the safety of pedestrians and cyclist and users of the car park.



Reflections

- A balance needed to be found in relation to the impact on the setting of the grade I listed church and the economic benefits of the loss of a significant part of the site to coastal erosion.
- Early engagement with Historic England was needed to address earlier issues which resulted in a refused application for a larger number of vans over a larger area.
- In order to address these concerns, the overall number of caravans was reduced, and the boundary pulled away from the south along with an increase in green spaces and increased planting.
- The church car park remained in the same location.

- A number of highways agencies were included (SCC Highways, NCC Highways and Highways England) at the pre-application stage. This was due to the main access being via Hopton in Norfolk the North via the A47 or from Corton (Suffolk).
- The speed limit was also agreed by SCC to be reduced from 60mph to 30mph as there will be changes to the entrance and a crossing for pedestrians to access the main site along with potential increase in cyclists along the improved shared footway.

Beach Road Car Park, Happisburgh, Norfolk

Planning Reference: PF/11/01/69

Proposal: Car Park and Ramp replacement

Date of Application: 2011

Date of Permission: 2011

Link to application: <https://idoxpa.north-norfolk.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=ZZZT68LNMS935>



Summary

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.

Details

The application was for the relocation of the existing community car park and a Beach Access Ramp, which was designed to be rolled back as the cliff erodes.

The ramp was cut into cliff with no permanent materials being used and the car park materials can be moved/retreated when necessary.

Reflections

- 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, Happisburgh, Norfolk

Planning Reference: PM/16/0428

Proposal: Residential property replacement

Date of Application: 2016

Date of Permission: 2016

Link to application: <https://idoxpa.north-norfolk.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=ZZZT68LNMS298>



Summary

Using government funding, nine properties at short-term (20 years) risk of erosion were purchased by North Norfolk District Council and demolished. These 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. Consequently, NNDC recouped a third of their costs.

Details

Nine residential properties located within the twenty-year risk zone were purchased by North Norfolk District Council in 2011 under voluntary agreement. The rollback opportunity under local

planning policy was secured by letter of agreement before the properties were demolished and the sites cleared and incorporated into wider clifftop open space. Sub-surface foundations and services were left in situ to minimise disturbance to the cliff. An assessment was completed as to where the relocated residential properties could be located. Although the policy allowed for properties to be located at other settlements within the district, it was agreed to seek to retain them within the parish from which they originated, to continue to maintain the viability of the village. Options were explored for a number of sites using viability assessments similar to one used to allocate development sites for local plans. The site was selected as preferred based on these criteria and a willing landowner. A legal agreement was established between the developer (NNDC) and the landowner to secure the rollback opportunity and commercial relationship between the two parties. A planning application was prepared and submitted. As with many local developments, there was a mixed response from the local community. These included calls for properties to be affordable homes, rather than open-market dwellings. Planning policy allows for like for like replacement and part of this trial was to understand how cost-viable such an approach would be. The land with planning consent was sold on the open market to a property developer and was subsequently constructed. This was one of the first examples of residential property relocation/rollback, with the purchase of the original properties, associated costs, documents for planning applications, legal agreement, and final profit share on the sale of the development site, approximately one third of NNDC's outlay was recouped.

Reflections

- 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, Trimmingham, Norfolk

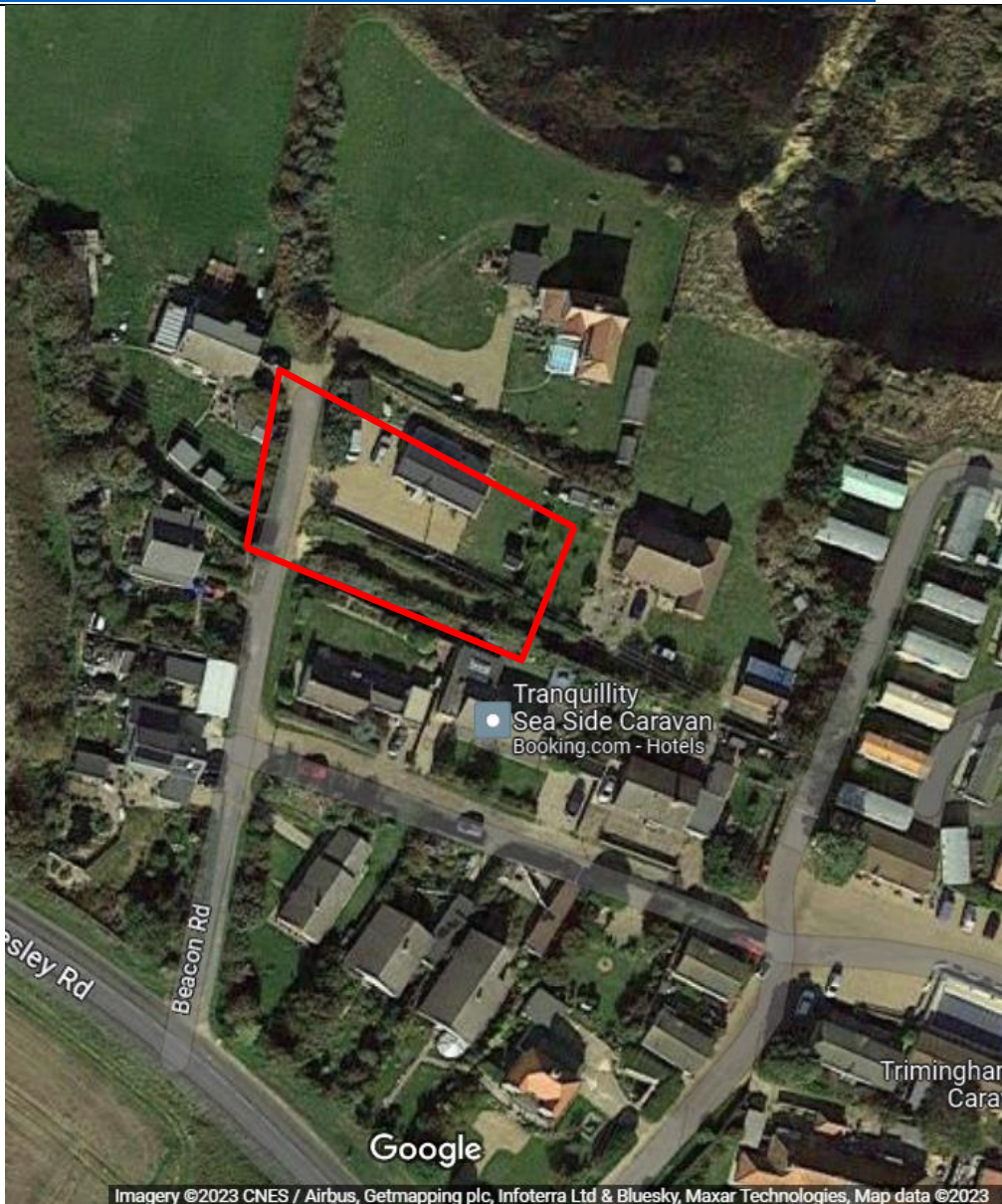
Planning Reference: PF/21/2182

Proposal: construction and siting of caravan and garage

Date of Application: 2021

Date of Permission: 2021

Link to application: <https://idoxpa.north-norfolk.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=QXPQ0HLNJHJ00>



Summary

This site is expected to be lost to erosion in 2025-2055 epoch (epoch 2). The applicant had historic permission to build an additional bricks-and-mortar house, however they instead, applied to place a caravan and garage on the site. It was considered that this was a preferable type of home, given the risk of erosion.

Details

The applicant had an 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

station a caravan on the land and erect a garage instead. 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, the garage was reduced from double to a single non-permanent wooden garage.

Reflections

- It is advantageous to be open to seek more appropriate solutions for historic live consents.

Easton Lane Easton Bavents, Reydon, Southwold, Suffolk

Planning Reference: DC/15/2428/DEM

Proposal: Demolition of a pair of semi-detached houses

Date of Application: 2015

Date of Permission: 2015

Link to application <https://publicaccess.eastsuffolk.gov.uk/online-applications/applicationDetails.do?activeTab=externalDocuments&keyVal=NPU1CIQX06O00>



Summary

Loss of two semi-detached houses however, rollback opportunities were available on the site allocation in the Waveney Local Plan (policy WLP6.1 Land West of Copperwheat Avenue, Reydon) in the form of 7 plots made available to households whose homes are to be lost to the sea.

Details

The properties were affected by coastal erosion and were extremely close to the cliff edge. Coastal management team was involved in the process, and this was funded by central government in relation to the pathfinder project. Demolition was considered essential. Relocation sites were addressed within the Reydon Neighbourhood Plan, but no specific sites were allocated.

Reflections

- 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 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.

Land west of Copperwheat Avenue, Reydon, Suffolk

Planning Reference: DC/19/1141/OUT

Proposal: Outline Application- Development of up to 220 dwellings with associated open space

Date of Application: 2019

Date of Permission: 2021

Link to planning application: <https://publicaccess.eastsuffolk.gov.uk/online-applications/advancedSearchResults.do?action=firstPage>



Aerial image of Reydon [source: © Mike Page, 2010]

Summary

A 220-dwelling allocation (Policy WLP6.1) was made in the Waveney Local Plan for a site in Reydon. Seven plots are made available for the relocation of properties under threat (or already lost) from coastal erosion.

Details

An allocation of 220 dwellings (WLP6.1) was made in the Waveney Local Plan, including seven plots for the relocation of dwellings either already lost, or under threat, from coastal erosion.

The plots have been included to assist particularly with the loss of (and threatened loss of) dwellings at nearby Easton Bavents. If the plots are not taken up within five years of the rest of the development being completed, the plots will revert to affordable housing.

The planning application was submitted in 2019 and a resolution to grant permission was reached at the Planning Committee in March 2020 (subject to the completion of a 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).

Reflections

- 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

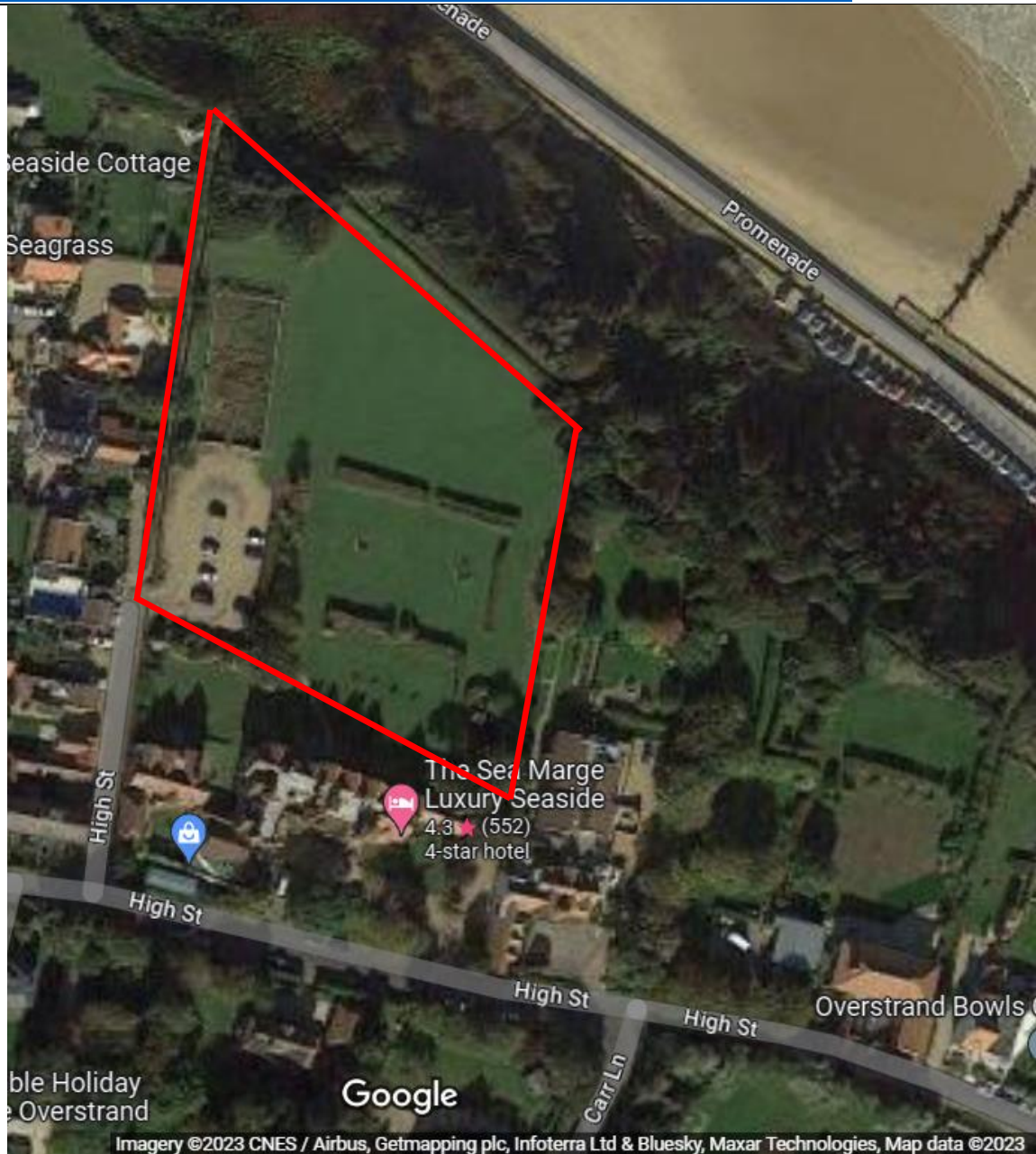
Planning Reference: PF/21/23/77

Proposal: Erection of seven moveable lodges in hotel grounds

Date of Application: 2021

Date of Permission: 2022

Link to application: <https://idoxpa.north-norfolk.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=QYTB32LNJUB00>



Summary

There was an historic permission for two storey bricks-and-mortar extension to rear of the hotel which is within the Epoch 2 area (indicative erosion up to 2055).

Applied for permission to site seven movable lodges in grounds instead of historic permission, and 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.

Reflections

Flexibility necessary to accommodate business needs and deliver practical solution to historic permission.

Wood Hill Holiday Park, East Runton, Norfolk

Planning Reference: PF/22/0351

Proposal: Rollback of caravans

Date of Application: 2022

Date of Permission: 2022

Link to application: <https://idoxpa.north-norfolk.gov.uk/online-applications/applicationDetails.do?keyVal=R739MZLN03O00&activeTab=summary>



Summary

The submitted application was for a hybrid rollback scheme, with some caravans being moved to the landward side of coastal site, and others being moved inland to a second site.

The application included well-researched supporting documents, including Coastal Erosion Vulnerability Assessment and Flood Risk and Drainage Assessment, and enabling development was also used as part of this application.

Details

The applicant's aim was to rollback the caravans and other facilities out of the 2105 epoch over three stages, beginning in 2022 and ending in 2055. This was to be done in two ways. Firstly, some caravans would be moved to the most landward edge of the site, into land which is currently used for touring plots. Secondly, some caravans would be moved to another site, Kelling Heath, several miles away. In total, the number of caravans in the site closest to the cliff would reduce from 64 to 40, with none of these being in the indicative erosion epochs (up to 2105) by the end of phase 3. This application showed considerable forward planning, considering impacts such as water run-off, landscape.

The applicant's consultants approached CPE beforehand to discuss the wider proposal, including how to remove redundant infrastructure. Several well-researched supporting documents were provided as part of the application, including, but not limited to, a Coastal Erosion Vulnerability

Assessment and a Flood Risk and Drainage Assessment. The CEVA identifies coastal erosion risks and how the proposed scheme will seek to mitigate these.

Total number of caravans increased from 64 on the site at Wood Hill to 40 on the Wood Hill site and 40 at Kelling Heath in order to ensure development was financially viable.

The only question that arose in this application was whether the Kelling Heath part of the rollback conformed to Policy EN12, which requires the new development to be in a location which is well related to the community from which it was displaced.

Reflections

- 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 Reference: PF/14/0120

Proposal: Formation of caravan park to provide pitches for 134 static caravans, 60 touring caravans and camping area with office/warden accommodation and amenity building

Date of Application: 2014

Date of Permission: 2015

Link to application: <https://idoxpa.north-norfolk.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=ZZZT68LNMS541>



Summary

The Caravan Park is located in the short-term risk zone. However, as part of Pathfinder project, North Norfolk District Council liaised with the caravan park to help them find a suitable site for the caravans to move to.

After the caravans and infrastructure was removed, the site was used as cliff-top grassland, providing a buffer between the village and the sea.

Details

Manor Caravan Park was primarily within the 2025 indicative coastal risk zone (epoch 1) of the shoreline management plan (SMP). Over a number of years, a significant number of static holiday home plots and land had been lost. A temporary consent had been granted to move the most at risk holiday homes onto an adjacent touring area. The holiday park had been identified by the local community as a key asset for the economic vibrancy of the village, with visitors supporting the local public house, shop, post office, etc. As such, NNDC's liaison with the village confirmed there was a desire to ensure the holiday park remained well-connected with the existing village and facilities. North Norfolk District Council provided a business grant to Manor Farm Holiday Park to investigate options to relocate away from the coastal erosion risk zone. These funds were used to complete a site viability assessment including if they may be available. This included landscape visibility assessment as the core part of the village is a conservation area and has a number of listed buildings. Park owner used this information to identify a 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 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, along with additional planting to improve biodiversity and the visual appearance of the area.

Reflections

- 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.

Corton Pathfinder Scheme, Suffolk

Planning Reference: N/A

Proposal: N/A

Date of Application: N/A

Date of Permission: N/A

Link to application: N/A



Aerial photography reproduced with kind permission of Mike Page www.mike-page.co.uk

Summary

Pathfinder projects for Corton and Easton Bavents were awarded £1.5m funding by Defra (in 2010-2014) to develop and trial ideas for managing coastal change and the impacts of coastal change. Corton is a significant tourism destination, with a number of caravan parks on the cliff top at risk from erosion and cliff failure and stabilisation of the top of Corton cliffs was a key aim and the reopening of Corton Promenade was also facilitated. Along with this there was an installation of a new fence at Broadland Sands Holiday Park to keep visitors away from the cliff edge.

Further work about the impact of coastal erosion and the future management of sea defences is ongoing.

Details

Public consultation identified clifftop stability, access to the beach and improved local amenities as major priorities for the local community and four local tourism businesses (caravan parks). Following this, the Pathfinder funded clifftop survey work and the design and installation of various drains across a 1 km section, which helped reduce the risk of the top of the cliffs from becoming waterlogged and unstable. The cost of the scheme was £355,000.

Pathfinder funding was also used to fund the clearance of Corton Promenade, a path which runs along the bottom of Corton cliffs, which was closed following cliff falls in 2011 and 2012/13. This path was identified as a popular tourist route and a valuable local asset. Clearance work, together with the clifftop stabilisation work, will keep the facility open for the foreseeable future.

Pathfinder funding was used to pay for a fence in front of the Broadland Sands Holiday Park, to keep visitors away from the vulnerable cliff edge. The fence can be moved to take account of future coastal retreat. This was in response to the failure of sea defences at the base of the cliff.

Further work was undertaken to understand long-term coastal change in the area, the impact this will have on local communities and working with them to manage coastal erosion risk management structures.

Reflections

- The drainage work has been generally effective in reducing clifftop instability. The increased confidence resulting from the installation has resulted in over £5m investment to improve tourism facilities, safeguarding jobs and infrastructure. The local businesses have taken on responsibility for monitoring and maintenance of the drainage system.
- Being flexible and adapting projects as circumstances changed was important.
- The project benefited from engagement with local communities, businesses and organisations, although was not as successful as had been hoped at engaging members of the community that considered the risks of coastal change to them to be low.

Report on the Corton Pathfinder project can be viewed here:

<https://www.coasteast.org.uk/assets/img/1414286.pdf>

Appendix 5 – Example 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.

Condition: Where coastal erosion occurs such that any of the [holiday lodges/equivalent] hereby permitted are situated within [X] metres of the cliff edge (measured as the shortest distance from the top of the cliff edge to the nearest point of the base of any [holiday lodge/equivalent] hereby permitted) then:

- a) The use of the affected [holiday lodge(s)/equivalent] shall cease; AND
- b) The [holiday lodge(s)/equivalent] now lying within [X] metres of the cliff edge shall be removed from the site by the site owner within [3 months] of the [holiday lodge(s)/equivalent] first becoming within [X] metres of the cliff edge; AND
- c) Within [3 months] of any [holiday lodge/equivalent] being removed, any associated areas of hardstanding shall be demolished and removed and the site shall be restored to grass in accordance with a scheme of works to be first submitted to and approved in writing by the Local Planning Authority.

The site owner shall notify the Local Planning Authority in writing within [14] days of any [holiday lodge/equivalent] hereby permitted becoming situated within [X] metres of the cliff edge.

Reason: Having regard to the progress of cliff erosion, risks to people and property associated with falling debris and appearance of the locality, and to ensure the site is appropriately restored in relation to character and appearance of the area.

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) (England) Order 2015 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.

Relocated Development

Condition: The land on which development is to be relocated away from shall be cleared of buildings and structures. The restoration of the land shall be in accordance with a strategy that shall be submitted to and approved in writing prior to commencement of the re-location development, and the restoration works shall be completed in full prior to first use or occupation of the new/relocated development.

Reason: To ensure that land on which development has been relocated away from is appropriately remediated and cleared in the interests of safety and character and appearance.

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 1987 (as amended)) 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 Planning⁴⁹
- Locality guidance for neighbourhood planning⁵⁰
- Local planning authority guidance (East Suffolk Council⁵¹, Great Yarmouth Borough Council⁵², North Norfolk District Council⁵³, and The Broads⁵⁴)

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:

- 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). If such plots were developed as self or custom build dwellings, they would benefit from Community

⁴⁹ <https://www.gov.uk/guidance/neighbourhood-planning--2>

⁵⁰ <https://neighbourhoodplanning.org/>

⁵¹ <https://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/>

⁵² <https://www.great-yarmouth.gov.uk/neighbourhood-planning>

⁵³ <https://www.north-norfolk.gov.uk/tasks/planning-policy/neighbourhood-planning/>

⁵⁴ <https://www.broads-authority.gov.uk/planning/planning-policies/neighbourhood-planning>

Infrastructure Levy (CIL)⁵⁵ 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, as well as opportunities to support habitat creation, rollback and relocation.

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

⁵⁵ Community Infrastructure Levy (CIL) is a charge levied on development, specified in the relevant local planning authority's charging schedule, to help fund infrastructure to support development. East Suffolk Council charges CIL: <https://www.eastsuffolk.gov.uk/planning/developer-contributions/community-infrastructure-levy/>. However, Great Yarmouth Borough Council, North Norfolk District Council and The Broads do not charge CIL.

Appendix 7 – Glossary

A

Area of Outstanding Natural Beauty (AONB)

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

C

Coastal accretion

When land is gained through the deposition of sediment, as a result of coastal processes.

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

Changes to the coast as a result of coastal processes and human interventions on the coast.

Coastal Change Management Area (CCMA)

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.

G

Geodiversity

The variety of rocks, fossils, minerals, natural processes, landforms, soils and waters which underlie and determine the character of our landscape and environment.

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 (ICZM)

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

L

Lead Local Flood Authority

A county council or unitary authority that leads in managing local flood risk (i.e. risks of flooding from surface water, ground water and ordinary watercourses).

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 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.

Permanent inundation

An area that is flooded by water from the sea on a regular enough frequency to prevent it being permanently habitable.

R

Ramsar site

A wetland of international importance, designated under the 1971 Ramsar Convention.

Relocation

The relocation of development from a site at risk from coastal change to a site of much lesser risk. Similar to 'rollback'.

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 (S106)

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.

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 local plan and operates as a material consideration in the determination of planning applications.

T

The Partnership

The group of organisations preparing the Coastal Adaptation SPD (East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority, and the shared Coastal Partnership East team).

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This document is available in alternative formats and in different languages on request. If you need support or assistance to help you read and/or understand this document, please contact the Council using one of the methods above.

Consultation Statement

Coastal Adaptation Supplementary Planning Document

September 2023



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1. Introduction

The 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. A formal consultation on the draft SPD was held for 6 weeks between 25 January and 8 March 2023.

This Consultation Statement was first 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 and has subsequently updated to reflect the consultation responses received during that consultation.

2. Who was consulted?

Consultation was split into two stages: an initial stage that informed the preparation of the Draft Supplementary Planning Document; and a formal stage of consultation that sought views on the Draft SPD.

Initial consultation

The initial consultation was carried out between 4 September and 16 October 2020. All of those registered on the Partnership's respective council planning policy mailing lists were directly consulted. Appendix 1 lists the consultation bodies and is summarised below:

- Town and Parish Councils
- Elected members
- Developers / landowners / agents
- Suffolk County Council
- Norfolk County Council
- Marine Management Organisation
- Historic England
- Natural England
- Environment Agency
- Members of the public

Social media was used to make members of the public and other organisations not on Councils' mailing lists aware of the consultation.

Consultation on the Draft SPD

Consultation on the Draft SPD was held between 25 January and 8 March 2023. As for the initial consultation, all of those registered on the Partnership's respective council planning policy mailing lists were directly consulted (Appendix 1).

A press release and social media were used to make members of the public and other organisations not on Councils' mailing lists aware of the consultation.

3. How were they consulted?

There were two stages to the consultation process as set out below.

Initial consultation

The initial consultation ran from 4 September and 16 October 2020. The consultation document was made available on the East Suffolk Council website (with links to the East Suffolk Council website from other Partnership websites) at:

<https://eastsuffolk.inconsult.uk/consult.ti/coastaladaptationspd2020/consultationHome>.

Hard copies of the document were 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 was advertised via the Partnership's respective social media accounts (see Appendix 2).

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?
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 [Responses to the Consultation - Coastal Adaptation Supplementary Planning Document Initial Consultation - East Suffolk Council, Strategic Planning Consultations \(inconsult.uk\)](#).

Consultation on the Draft SPD

The formal consultation ran from 25 January and 8 March 2023. The consultation documents were made available on the East Suffolk Council website (with links to the East Suffolk Council website from other Partnership websites) at: [Draft Coastal Adaptation Supplementary Planning Document - East Suffolk Council, Strategic Planning Consultations \(inconsult.uk\)](#)

Copies of the draft SPD and accompanying Consultation Statement were made available for inspection across the Partnership authorities' areas in the following locations:

- East Suffolk - Libraries and customer service centres.
- Great Yarmouth – Town Hall.
- North Norfolk – Cromer and Fakenham offices, public libraries within North Norfolk, and Aylsham, Norwich (Millennium Library), Reepham, and Wroxham libraries.
- Broads – Libraries and council offices.

Posters were also provided to these locations, and paper copies were printed and made available upon request. The consultation was promoted via the Partnership's respective social media accounts and a press release published (see Appendix 4 Draft consultation promotion material).

In total 52 individuals and organisations responded to the consultation providing 185 comments. The comments made, the Partnerships response and the changes made to the SPD are presented in Appendix 5. The responses made have also been published on the East Suffolk Council website at <https://eastsuffolk.inconsult.uk/draftcoastaladaptationspd2023/listRespondents>

4. What were the main issues raised?

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.

Consultation on the Draft SPD

A summary of the main issues raised through the consultation on the Draft SPD is as follows:

1. Introduction
 - The SPD should amend Local Plan policies.
 - The SPD should change the protection status of certain stretches of coast.
 - The SPD should address Nationally Significant Infrastructure Projects.
 - The SPD should provide guidance in relation to compensation for land lost to the sea.
 - The SPD should address flood risk in addition to erosion risk.

- Technical language and jargon should be avoided, but where needed should be added to glossary.
2. Context: Homes, Businesses, Communities, and Environment Affected by Coastal Change
 - Management of the coast can impact coastal processes and effects on the coast.
 - The SPD should provide more detail in relation to the geology and coastal process along the coast to which the SPD relates.
 - Climate change is likely to increase the uncertainty in predicting future changes to the coast.
 3. Coastal Management Measures and Policies
 - Greater emphasis should be placed on natural habitats and species on the coast.
 - The SPD should provide further information relating to marine plans and the interrelationship between the marine and land based planning systems.
 - The objectives of Shoreline Management Plans should be updated.
 4. Development in the Coastal Change Management Area
 - Support for the approach to development within the Coastal Change Management Area set out within Table 1 of the SPD.
 - Below ground infrastructure should be considered through a Coastal Erosion Vulnerability Assessment.
 - Detailed comments made relating to particular types of development and their suitability within the Coastal Change Management Area.
 5. Rollback and Relocation
 - Rollback and relocation proposals should take opportunities to realign the England Coast Path.
 - Further guidance on how potential relocation sites within either AONB should be considered.
 - Rollback and relocation guidance should be more flexible, especially for residential and commercial properties/businesses.
 - Further information about the potential for rollback creation/recreation of natural habitats should be provided.
 - Further information should be provided on how agricultural land/buildings and infrastructure can/should be rolled back/relocated.
 6. Enabling Development
 - Various detailed circumstances in which enabling development should be supported were proposed.
 - Requests made for further information on whether enabling development could facilitate habitat creation/relocation.
 - Support expressed for the role of enabling development for the tourism industry.
 7. Appendices
 - Further case studies of coastal adaptation were proposed for consideration and inclusion in the SPD.

Appendix 1: Consultation bodies

The following organisations and groups were consulted at both the initial and formal consultation stages.

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 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

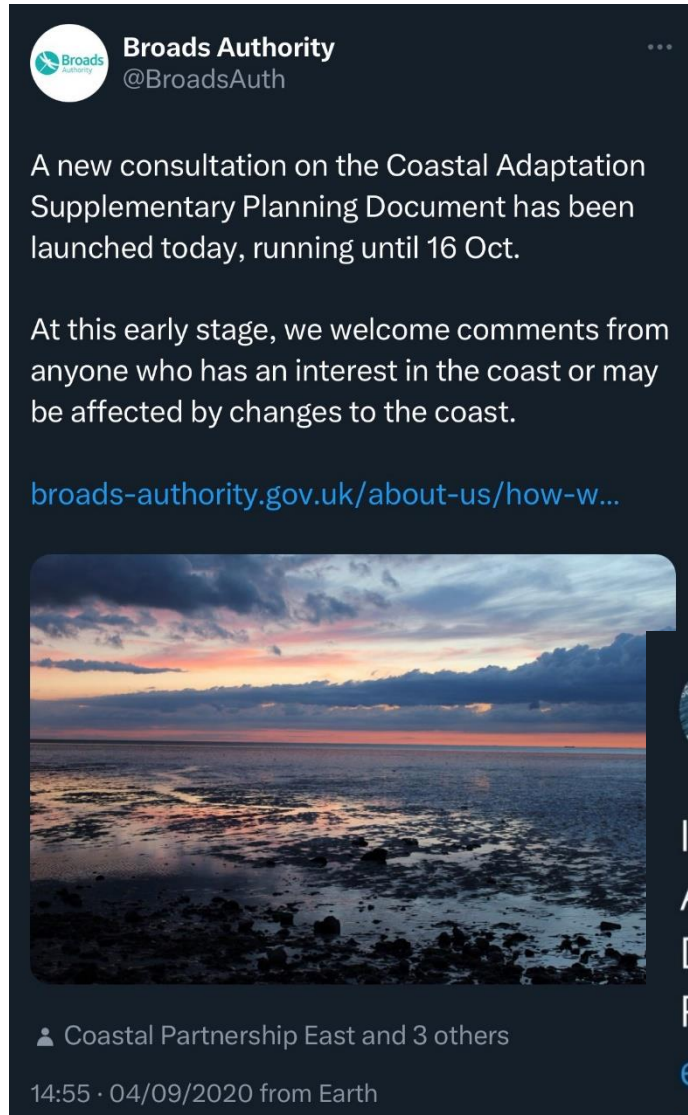
- Voluntary bodies some or all of whose activities benefit any part of the SPD area
- Bodies which represent the interests of different racial, ethnic or national groups in the SPD area
- Bodies which represent the interests of different religious groups in the SPD area
- Bodies which represent the interests 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 2: Initial consultation social media posts

Example provided by the Broads Authority and East Suffolk Council:



Appendix 3: Initial consultation responses

The table below lists the consultation responses to the initial consultation (4 September – 16 October 2020), alongside the Partnership response and changes made to the SPD.

1. Do you consider the scope and proposed content of the Supplementary Planning Document to be appropriate?

Respondent	Comment	Partnership Response	Changes Made
Stu Precious	It says virtually nothing using multiple pages.	The initial consultation gave respondents the opportunity to influence the broad content of the SPD. After taking account of consultation responses the Partnership Authorities will prepare and then consult on the draft SPD, which will contain the full detail.	No change.
Lindsay Frost	Integrated Coastal Zone Management needs to include physical geography processes, such as sediment cells, onshore land use and activities and offshore uses and activities.	Guidance relating to planning policy implications for land uses and activities affecting the coast will be included within the SPD. This SPD, however, cannot directly address offshore uses and processes as these lie outside the terrestrial planning realm. The document also cannot duplicate or replace the remit and contents of Shoreline Management Plans, but will have appropriate regard to them.	No change.
Richard Starling	One should not have to register or log in to participate in a consultation. This will deter many people from participating.	Comment noted. There was also the opportunity to email and or post responses to the Partnership.	No change.
Martlesham Sea Wall Group (Thomas O'Brien)	See below	Comment noted. Regard has been had to the comments made under other questions.	No change.
Norman Castleton	Pleased to see that the Broads Authority has be included in this although quite frankly I can see little reason for another document concerning the subject of managing the coast. The problem seems to me to be plenty of paperwork but little practical effort. Plenty of retreat with	The SPD cannot alter the approach to the management of the coast, as this is the role of Shoreline Management Plans (SMPs). The aim of the SPD is to provide guidance to assist in the	No change.

Respondent	Comment	Partnership Response	Changes Made
	very little of it managed. I would suggest a more clear interaction with SMP. For example will there be a closer examination of the need to defend parts of the coast where the SMP says nothing should be done. Will the resources be available to manage the coastline properly or is the intention just to let everything go?	application of Local Plan policies regarding coastal adaptation.	
Norfolk County Council - Natural Environment Team (Catherine Dew)	We support the Coastal Adaptation Supplementary Planning Document and have the following comments for consideration. The SPD seems to focus on the human impacts. It should also include the 'natural environment' – the habitats and species which form the coastal (and marine) environment as the management measures and policies will impact on them and the ecosystem services and recreational use, they provide. They are inextricably linked.	Support welcomed. The SPD will seek to provide guidance on the implementation of coastal planning policies. The SPD will set out the affects that coastal processes and policies can have on coastal ecology (and vice versa), and identify ways in which such impacts can be lessened and ways in which coastal adaptation can best serve the needs of the natural environment.	The SPD emphasises the impacts of coastal processes and planning policies on the natural environment, and provides guidance on ways in which such impacts can be lessened through coastal adaptation.
Blue Sky Leisure (Paul Timewell)	<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 considered as being appropriate to justify a variation in</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 necessary to include details of emergency cases:</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>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>	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.
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	The SPD will within its context chapter, set out the affects that coastal processes and policies can have on the natural environment.	The SPD sets out the impacts of coastal processes and planning

Respondent	Comment	Partnership Response	Changes Made
	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.	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.	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 Beever)	Scope: section 2 should summarize current mitigation policies, especially in context of those areas where policy is hold-the-line as at Southwold.	The SPD will include a summary of the powers bestowed on coastal authorities and our partners (such as the Environment Agency) as well as policies to manage the coast, including mitigation policies.	No change.
Anglian Water Services Ltd (Stewart Patience)	Consideration should also be given to existing infrastructure located within the area covered by the SPD as follows: • water and water recycling infrastructure provided by Anglian Water and • existing infrastructure including ports within the area and energy generation	The SPD will provide guidance relating to the implementation of coastal planning policies, which will be relevant to existing and planned infrastructure at the coast.	No change.
Barton Willmore (Will Spencer)	NFOWF Ltd supports the objectives for producing the SPD, as identified in Section 1 of the Consultation Document. This includes helping coastal communities to prosper and	Support noted. The SPD does not wish to restrict appropriate development at the coast. However, certain development types will normally be	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>to adapt to coastal change, but to also provide detailed guidance on the interpretation of policies with a whole coast approach. Our client also welcomes and agrees with the statement that the SPD will not: • Create new or amend existing planning policies as this is the role of the Development Plan and National Policy, or • Alter the approach to the management of the coast as this is the role of SMPs.</p> <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 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</p>	<p>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>	

Respondent	Comment	Partnership Response	Changes Made
	management plan to address potential impacts on coastal processes.		
Bidwells (Kate Hammond)	Looking at the 5 points of the SPD, we believe it covers most areas of Coastal change, however, we would like to see more emphasis on traffic management and road infrastructure which is not specifically mentioned with in the summaries. This is vital especially between Sidestrand and Mundesley where coastal erosion is accelerating and will have a huge impact on the existing road infrastructure.	The SPD will provide guidance relating to the implementation of coastal planning policies, which will be relevant to existing and planned infrastructure at the coast, including highways.	No change.
RSPB (Ian Robinson)	<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 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</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>	The SPD sets out the impacts of coastal processes and planning policies on the natural environment.

Respondent	Comment	Partnership Response	Changes Made
	<p>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	No change.

Respondent	Comment	Partnership Response	Changes Made
		they may affect coastal management and adaptation policies.	
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 implementation of coastal adaptation planning policies.	No change.
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

Respondent	Comment	Partnership Response	Changes Made
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.
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	The SPD will provide guidance relating to the implementation of rollback and relocation policies,	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>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.</p>	<p>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.</p>	
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	<p>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?</p>	<p>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.</p> <p>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.</p>	No change.
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</p>	<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>	The SPD will contain a glossary of key terms.

Respondent	Comment	Partnership Response	Changes Made
	use planning had traditionally been a separate topic. Four strands of law and regulation cover those issues, with Responsible authorities being: • Flood protection: The Environment Agency (EA) • Coast Protection: District & Unitary LAs, as Coast Protection Authorities (CPAs), under the 1949 Coast Protection Act • Planning; District & Unitary LAs, as Local Planning Authorities (LPAs). • Marine ecology and management (the MMO) Within the Planning section, reference should be made to: • The relevant NPPF sections, particularly paragraph 160(b) – “Developments should be safe for their lifetime.” (our perception of some recent planning applications has been that too much reliance has been given to the sequential test in isolation, without the over-riding “safe” factor of 160(b) • Shoreline Management Plans and their role as a non-statutory evidence base, including the meaning, with examples, of the 3 policy options. Links to relevant documents: NPPF, SMP, role of Estuary and other flood plans.		
J E Blanchflower	Preservation of fragile and diminishing coastal habitats such as salt marshes by strengthening Local Planning Policy to prevent damaging development of any kind (public and private) or activities (e.g. dredging) in areas which are vulnerable or nationally designated. Emphasising the 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.	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 by robust evidence and have been prepared in a manner that can then be more speedily determined.	No change.
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.

Respondent	Comment	Partnership Response	Changes Made
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.
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	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	No change.

Respondent	Comment	Partnership Response	Changes Made
	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 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.	Development Plan and National Policy. However, the SPD will provide guidance relating to the implementation of coastal adaptation planning policies.	
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	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	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>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 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.</p>	<p>these relate to the Development Consent Order (DCO) procedure and not to planning applications for which the Local Planning Authority is the determining body.</p>	
Bidwells (Kate Hammond)	<p>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.</p>	<p>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.</p>	No change.
RSPB (Ian Robinson)	<p>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</p>	<p>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</p>	<p>The SPD will set out the importance of the natural environment and the impacts of coastal processes</p>

Respondent	Comment	Partnership Response	Changes Made
	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 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.	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).	and planning policies on the natural environment.
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	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.

Respondent	Comment	Partnership Response	Changes Made
	biodiversity areas, and you make no attempt to explain the current position.		
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 studies of coastal adaptation best practice. The SPD will, however, provide guidance relating to implementation of coastal adaptation planning policies.	No change.
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.
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.

Respondent	Comment	Partnership Response	Changes Made
Richard Starling	Guidance should be to wait until the Broadland Futures Initiative consultation has been completed.	This SPD and the Broadland Futures Initiative (BFI) operate within the same topic area, that of coastal change. However, the SPD is very much focussed on providing guidance relating to the implementation of planning policies, whereas the BFI is looking to inform the overarching flood risk management strategy for the next 100 years over a much wider area. The SPD and BFI can complement each other, and the SPD need not be restricted by the timings of the BFI.	No change.
Norman Castleton	Convincing argument as to why one part of coastline should be defended and others not. If the term managed retreat is used - what is precisely meant by managed. By this I mean arguments other than economic criteria as defined by population density areas. Clear definitions and actions regarding holding the line and even extending the line.	The SPD will not alter the approach to the management of the coast as this is the role of SMPs. The SPD will provide a glossary of terms.	Introduce a glossary of terms into the SPD.
Norfolk County Council - Natural Environment Team (Catherine Dew)	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 biodiversity and the natural environment where relevant to the implementation of coastal planning policies.	No change.
Blue Sky Leisure (Paul Timewell)	The SPD should include a specific section dealing with the caravan and camping parks. These are an important resource along the coast and contribute significantly to the availability of holiday accommodation and consequently greatly impact upon the local economy. This is especially the case in East Anglia where the availability of alternative holiday accommodation along the coast is limited. They operate differently from other businesses, often focused on a seasonal basis and have different needs and requirements. There are also operational differences between different types of park, for instances those with fleet caravans (short term lets) compared with owner	The SPD will include guidance relating to the implementation of coastal planning policies, including roll back and relocation and there is clear merit in addressing caravan and camping parks as part of this, which are (as stated) significant feature of the local economy. At least one case study should cover this issue and there may be value in considering a number of kinds of development separately.	Ensure that appropriate consideration is given to caravan and camping parks

Respondent	Comment	Partnership Response	Changes Made
	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.		
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	a. Please include clear guidance on the expectations relating to the need for Flood Risk Emergency Plans (https://www.adeptnet.org.uk/system/files/documents/ADEPT%20%26%20EA%20Flood%20risk%20emergency%20plans%20for%20new%20development%20September%202019....pdf) and the level of detail expected. In line with the direction of the Flood Risk and Coastal Erosion Policy Statement (2020), it could be prudent for guidance to be provided on requesting the applicant to outline their personal and business contingency plans for the short and medium term in relation to flood risk and coastal change Emergency Plans.	The SPD will not create new or amend existing planning policies as this is the role of the Development Plan and National Policy.	No change.
Felixstowe Town Council (Ash Tadjrishi)	The SPD should outline all relevant guidance, not only from Planning documents but also from the EA, LLFAs, MMO, NE, AONB in order to assist applicants and planning officers to consider all cohesively. Reference should be made to the Coastal Concordat.	The SPD will provide guidance relating to the implementation of coastal planning policies, and to other guidance where relevant to the implementation of coastal planning policies.	No change.
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.

Respondent	Comment	Partnership Response	Changes Made
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 (Lesley Beevor)	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 implementation of coastal planning policies, which apply to all areas	No change.
Water Management Alliance (Jessica Nobbs)	The Internal Drainage Boards of the Broads (2006) and East Suffolk specifically would want to be consulted on any potential developments (including both permanent and temporary) within their Internal Drainage District by the relevant Local Planning Authorities. The Board believe this to be important as enabling development may impact on areas where important infrastructure such as Board Adopted Watercourses and Pumping Stations etc are cited. The Board may also have an interest in development that would be subject to its Byelaws (namely Byelaw 10 and Byelaw 3). The Board look to promote sustainable development within the IDD whilst taking into consideration elements such as environmental duties and ecological wellbeing, therefore having sight of potential developments that would impact on our IDD is important. CCMA should cover whole tidal flood risk zones to ensure catchment scale long term special planning to prevent inappropriate development now that will increase the cost of later enforced adaption from forecast sea level rise.	The Councils will ensure that the IDBs are being consulted on relevant applications The SPD cannot not alter the CCMA as this is the role of Local Plans and SMPs.	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)	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 applications, the pre-application charging process is available and recommended	No change.
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	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
	'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/ .		

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 taking account of consultation responses the Partnership Authorities will prepare and consult on the Draft SPD.	No change.
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.

Respondent	Comment	Partnership Response	Changes Made
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. 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.	No change.
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.

Respondent	Comment	Partnership Response	Changes Made
Felixstowe Town Council (Ash Tadjirishi)	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 planning policies. Other Local Plan and NPPF policies cover development potentially affecting nationally designated areas.	No change.
Lowestoft Cruising Club (David Bennett)	Not sure if this question refers to 3. Links to Shoreline Management Plans (SMPs), or 4.3 Development in the Coastal Change Management Area.	Comment noted. The question should have referred to section 4.3.	No change.
Andrew McDonald	Yes, although '...development which could have adverse impacts on coastal erosion, coastal processes and vulnerability elsewhere...' could be expanded upon - is the 'vulnerability' strictly limited to coastal change?	Comment noted. The SPD will provide guidance relating to the implementation of coastal planning policies. Vulnerability, as referenced in the initial consultation document is referring to coastal erosion and coastal processes.	No change.
Peter Terrington	Yes but more emphasis need on the impacts of development in areas of accretion. See 10 below.	The identification of the CCMA extent takes account of coastal accretion. The SPD will provide guidance relating to development within the CCMA.	
SCEG - Scratby and California Environment Group (Lodge)	Clarification of use of land within the CCMA Commercial usage.	Commercial development will be covered under 'permanent and temporary development on the Coast'.	No change.
Southwold Town Council (Lesley Beever)	Ok	Comment noted.	N/A

Respondent	Comment	Partnership Response	Changes Made
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
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	The SPD will within its context chapter, set out the affects that coastal processes and policies can have on the natural environment.	Emphasise the impacts of coastal processes and planning policies on the

Respondent	Comment	Partnership Response	Changes Made
	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 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.	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	No change.

Respondent	Comment	Partnership Response	Changes Made
		infrastructure regime. Whilst the construction will be temporary, the buildings themselves will be permanent, of course	
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.
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.

Respondent	Comment	Partnership Response	Changes Made
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 temporary drainage strategy would need to be considered. The same LLFA guidance as for permanent developments would apply.	The SPD will provide a definition for temporary development and this could include site compounds etc (if relevant)	No change.
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

Respondent	Comment	Partnership Response	Changes Made
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.
Deben Estuary Partnership (Christine Block)	No Comment	N/A	N/A
Anglian Water Services Ltd (Stewart Patience)	No Comment	N/A	N/A
Barton Willmore (Will Spencer)	No Comment	N/A	N/A
Bidwells (Kate Hammond)	We believe approximate scientific time scales should be considered as part of the document and these should be reviewed as part of the development of this document.	The SPD will provide guidance relating to time limits of development, but the latest scientific evidence on sea-level rise, climate change etc and implications for planning and environmental policy is produced by Defra, DHLUC and the Environment Agency; the SPD therefore cannot alter these parameters	No change.
RSPB (Ian Robinson)	As described above in our comments related to Q3 the CCMA needs to be defined accurately. Any temporary development should only be considered as part of the staging process to move from the existing	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).	No change.

Respondent	Comment	Partnership Response	Changes Made
	position/defended lines to a future one. Equally the approach as defined in NPPF para 171 is critical in applying an assessment based on the hierarchy of designations and ‘taking a strategic approach to maintaining and enhancing networks of habitats and green infrastructure, and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.’ Adopting a universally accepted approach across all 3 SMP areas is essential. For example, SMP 5 and 6 take account of internationally protected sites and species – ‘considered pertinent legislation.’ SMP 7 only takes account of Annex 1 habitats, where there are extensive areas of internationally important freshwater habitats within this SMP zone.	The SPD will provide guidance relating to the implementation of coastal planning policies.	
The British Horse Society (Charlotte Ditchburn)	The same guidance should be provided for temporary development as that for permanent development in the Coastal Change Management Area.	Comment noted.	No change.

6. What elements should be included within a Coastal Erosion Vulnerability Assessment (CEVA)?

Respondent	Comment	Partnership Response	Make Changes
esc (beavan)	height above sea level, geology, likelihood of funding for defences	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
Stu Precious	Property assessments Biodiversity assessments. Erosion Timescale assessments. Best practice audits. Hold the line v managed retreat. Budgetary impact assessments. Economic impact assessments. Long term Impact assessments.	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
unite the union (Robert Riley)	none	N/A	N/A
Jeffrey Hallett	Short and long term effects and the impact on both everyday life and tourism.	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
Margaret Hallett	The effect on people's every-day existence and longer term well-being	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
North Norfolk District Council (Harry Blathwayt)	Sand dredging at sea, particularly in the Yare alluvial basin off Great Yarmouth. I can not find definitive research on the impact on beaches to the north of this activity.	<p>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, 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>	No change.

Respondent	Comment	Partnership Response	Make Changes
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 expected content and technical work needed to underpin them and any expectations/requirements for Council and public engagement.	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 would be a matter for the decision maker, and cannot be prescribed in the SPD.	No change.
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.	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
	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.		
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.
SCEG - Scratby and California	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	No change.

Respondent	Comment	Partnership Response	Make Changes
Environment Group (Lodge)		vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	
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.
RSPB (Ian Robinson)	There should be a section in the proposed content on 'Working together to ensure a coherent network of designated coastal habitats is maintained through	Comment noted. However, the SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs).	No change.

Respondent	Comment	Partnership Response	Make Changes
	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.		

7. What guidance on Roll-back and relocation options should be included?

Respondent	Comment	Partnership Response	Changes Made
esc (beavan)	need more resilience planning	Comment noted; resilience is an important consideration	No change.
Stu Precious	Timescales, Compulsary purchase Process help and guidance, Help to sell/dispose of assets, Avoidance of negative equity assistance. Alternative options to roll back. If the Dutch can do it why can't we. Investment in effective anti erosion strategies. Case Study, Hopton Beach. Accurate Bathymetric and Longshore Drift surveys. Roll back and relocation sounds like you're giving up.	Comment noted. The SPD cannot create new or amend existing planning policies as this is the role of the Development Plan and National Policy and SMPs determine the management of the coast.	No change.
Janet Huckle	I refer here to Pakefield Lighthouse active 1886-1906. Although not a functioning Trinity House lighthouse it serves an important purpose. It is run and maintained by Pakefield Coast Watch which is a growing number of Coastal Surveillance Stations manned by volunteer men	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
	and women, located 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	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.

Respondent	Comment	Partnership Response	Changes Made
	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.		
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). The SPD will not alter the approach to the management of the coast as this is the role of SMPs.	No change.
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	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	No change.

Respondent	Comment	Partnership Response	Changes Made
	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 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	
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	a. The timescale guidance; b. Planning permission requirements; c. Funding streams that may be available to support. d. How roll back / relocation will be considered in terms of planning consideration and whether there will be any variations from normal planning application submission?	Comment noted. The Partnership will consider whether to provide guidance relating to details of potential funding streams available to rollback and relocation proposals.	Detail potential funding streams available to rollback and relocation proposals.
Felixstowe Town Council (Ash Tadjrishi)	No comment – this is not currently relevant to Felixstowe - long may that remain so.	N/A	N/A
J E Blanchflower	I don't understand the jargon, therefore I cannot answer this question.	Comment noted. A glossary will be included in the SPD.	No change.
Lowestoft Cruising Club (David Bennett)	While a cost benefit analysis is appropriate, there may be other factors to consider, e.g. preserving historic sites and buildings, looking longer term at the impacts of the climate emergency.	Preservation of historic sites and buildings will be an important consideration in relevant situations	No change.
N/A (Caroline Spinks)	Impact assessments should be made on areas deemed suitable for relocation.	Any potential relocation areas will need to be assessed carefully and the SPD will provide guidance	No change.
Andrew McDonald	Again, the statement envisages 'the movement of assets currently or soon to be at risk from coastal change to less vulnerable locations...' and it would be helpful to extend the definition of 'vulnerable' to include the inherent vulnerabilities of the relocation site as well as the underlying vulnerability due to coastal change.	The SPD will provide a glossary of terms. In general terms, the relocation site will need to be safe from coastal erosion.	No change

Respondent	Comment	Partnership Response	Changes Made
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.
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 important considerations for rollback and relocation proposals.	No change
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)	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	<p>Comment noted. The SPD cannot identify land for development, for future rollback or relocation, as this is the role of the Development Plan.</p> <p>The SPD will provide guidance relating to enabling development, but again cannot create or modify existing policy.</p>	No change.

Respondent	Comment	Partnership Response	Changes Made
	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.		
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 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 given to the time needed to	<p>The Partnership will explore the opportunity to provide guidance relating to compensation.</p> <p>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</p>	Consider providing guidance relating to compensation and other financial assistance for coastal adaptation projects.

Respondent	Comment	Partnership Response	Changes Made
	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, unless such proposals overlap with the terrestrial planning regime.	No change.

Respondent	Comment	Partnership Response	Changes Made
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 is 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.
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	No change.

Respondent	Comment	Partnership Response	Changes Made
		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.	
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 Flood Authority (Sarah Luff)	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 guidance to be produced on conducting ground	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
	investigations, building access routes and putting up storage area that is in accordance with our current LLFA developer guidance and LLFA policies. Again, our requirement for a Flood Risk Assessment and temporary drainage strategy would need to be completed in accordance with our existing guidance.		
Felixstowe Town Council (Ash Tadjrishi)	No comment – this is not currently relevant to Felixstowe - long may that remain so.	N/A	N/A
J E Blanchflower	Suggesting sites for development away from the coast or using 'brown field' coastal sites. Coastal development should be discouraged so that the remaining undeveloped sections of our coastline remain as wildlife habitats to be appreciated by future generations. Above all, no more second homes on coastal sites.	Comment noted. Enabling development would normally be expected to be away from the coast. The SPD has no power to limit whether any new homes are second homes.	No change.
Lowestoft Cruising Club (David Bennett)	Difficult to suggest specific guidance as it depends on the particular development and how it is contrary to policy, and how and to what extent it would secure a particular public benefit which may outweigh the disbenefits of departing from policy.	Comment noted and agreed – enabling development can only be judged on a case-by-case basis	No change.
N/A (Caroline Spinks)	Sometimes NOT to develop may be the more valuable option.	Comment noted.	No change.
Andrew McDonald	Previous experience of the proposed (and actual) use of Enabling Development by Suffolk Coastal D C (and the statements in sections 3.72-3.74 of the recently adopted East Suffolk Local Plan) give cause for concern that Enabling Development may be regarded as a policy option, rather than an exceptional mechanism. It is also difficult to determine from the consultation document exactly what form this 'option' would take – could ED be used as a fundraising mechanism to defray the cost of relocation? Or would it be used as a mechanism for siting relocated housing in areas which would normally be inaccessible to development? In either case, it is important to take very	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 allocation of 220 new dwellings in	No change.

Respondent	Comment	Partnership Response	Changes Made
	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.	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
Deben Estuary Partnership (Christine Block)	Points on Enabling Development taken from the appendix to Deben Estuary Plan: Enabling development may be permitted as an exception to policy when delivering sufficient, measurable benefits to flood protection and	Comment noted. Consideration will be given to the Deben Estuary Plan’s enabling development criteria with a view to setting out appropriate criteria in the draft SPD.	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>estuary management which could not otherwise be achieved. Reasons for allowing Enabling Development: •• to provide direct financial benefit to estuary management – focused on essential, long term, flood protection measures within a defined estuary area, necessary to maintain or improve flood defence •• to support opportunities to deliver partnership funding when a lack or shortfall of government grant aid and other finance and restricts action •• to support flood protection measures which have been agreed as necessary by all relevant landowners and consented by the EA Site selection for enabling development should: •• be located outside areas identified by the Environment Agency as being at risk of flooding from estuaries or sea •• be based on a principle of the optimal number of additional dwellings sustainable within a defined parish and estuary area •• be appropriate in scale, sensitive to the topography and mindful of any landscape and environmental designations that apply •• have no significant, adverse impact on biodiversity and geodiversity •• contribute to enhancing or maintaining the sustainability of rural communities in accordance with the Settlement Hierarchy •• deliver development that reflects, when possible, evidenced local need in terms of dwelling size and configuration •• include the conversion or re-use of redundant or disused buildings</p>		
Anglian Water Services Ltd (Stewart Patience)	No Comment	N/A	N/A
Barton Willmore (Will Spencer)	<p>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</p>	<p>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</p>	No change.

Respondent	Comment	Partnership Response	Changes Made
	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.	are not normally enabling development themselves and will be considered elsewhere in the SPD	
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 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	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
	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.
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	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
	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.		
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.
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

Respondent	Comment	Partnership Response	Changes Made
Peter Terrington	Community instigated flood defence scheme at Waldringfield.	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
SCEG - Scratby and California Environment Group (Lodge)	Ones quoted by the EA for example, the kit house presentation, The relocation of caravan site at Happisburgh.	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
Southwold Town Council (Lesley Beevor)	No Comment	N/A	N/A
Water Management Alliance (Jessica Nobbs)	Aldhurst Farm Leiston wetland creation scheme? whilst compensation for Sizewell C akin to what would be required to enable migration of habitats and species.	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
Deben Estuary Partnership (Christine Block)	No Comment	N/A	N/A
Anglian Water Services Ltd (Stewart Patience)	No Comment	N/A	N/A
Barton Willmore (Will Spencer)	There are a large number of offshore wind farms in the UK that have been successfully delivered without significant adverse effects on coastal processes and/or coastal management. NFOWF Ltd would welcome the opportunity to discuss these with the Councils as a means of identifying one or more examples as coastal adaptation best practice. We trust you will find the above comments helpful in preparing the proposed SPD and we look forward to the draft version being issued for consultation. NFOWF Ltd would be happy to meet to discuss the SPD in more detail should that be considered useful.	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
Bidwells (Kate Hammond)	No Comment	N/A	N/A
RSPB (Ian Robinson)	The RSPB has developed a range of expertise in managing coastal change projects and consider that the lessons learnt	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
	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.		

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 Partnership Authorities will prepare and consult on the draft SPD.	No change.

Respondent	Comment	Partnership Response	Changes Made
Paul Johnson	The document is totally unsuitable for a public consultation as it lacks any attempt to make the content readable by people unskilled in coastal management. The aim of any public consultation is to present information in a manner that it is understandable. My background is education - Post 16, and I'm shocked at the document you are asking ordinary individuals to comment on. I can only assume that the intention is to NOT receive comment. The document is totally unsuitable for presentation to non-specialists. Run it through Flesch Reading Ease and Flesch-Kincaide Grade Level formulas and it's clear comments will be detached and probably irrelevant. Clearly the questions in this survey are designed to ensure only experts answer as the questions are I'm possible for laymen to answer. I've very disappointed, but I appear ill qualified to comment on these questions - a very unsatisfactory arrangement.	It is inevitable that the consultation document (a scoping document, focusing on the proposed areas of content, rather than the content itself) was somewhat technical, given its subject area and the nature of SPDs. However, the Partnership will endeavour to ensure that the draft SPD will be easily understandable to the lay reader and endeavour to keep the use of jargon to a minimum, with a glossary to explain more technical terms.	Technical language has been used sparingly throughout the draft SPD, and a glossary has been provided to help explain technical terms.
Janet Huckle	I hope that the partnership is able to work together to preserve and maintain our beautiful coastline for the future.	The draft SPD seeks to strike the right balance between guidance in support of the effective management of the coast, and the application of planning policies for coastal adaptation, whether that be concerning development or the natural environment.	No change.
unite the union (Robert Riley)	To get out and meet people at there front of there houses , to engage with people at all local levels . the people of Lowestoft are ,not happy with the INFRASTRUCTURE of the town of Lowestoft . THE PEOPLE of Lowestoft ALL THINK that you have forgotten them .	Unfortunately, Covid-19 reduced the ability to engage with communities in a face to face manner through the initial consultation. However, there has been a good response to the initial consultation, as with other recent consultations.	No change.
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.

Respondent	Comment	Partnership Response	Changes Made
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' 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.
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 the environment along the coast. The draft SPD will set out the roles and responsibilities of some of the key organisations on the coast.	Set out the roles and responsibilities of key organisations along 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	When adopted, the SPD will be a material consideration and carry weight in the determination of planning applications. The Partnership preparing the SPD includes East Suffolk Council, Great Yarmouth Borough Council, The Broads Authority, North Norfolk District Council,	No change.

Respondent	Comment	Partnership Response	Changes Made
	building distances between planed structures and the sea wall here in Lowestoft. Only for the local authority at the time to overrule what has been published. What are the chances of one area seeing the benefit and there to be realistic control. 4. It is apparent that the Port Authority here has more clout than many appreciate. By closing of roads that have been used by the public for many years. Or even the South Pier. So will the power of Felixstowe lead to unbalanced approach 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.	and the Coastal Partnership East Team. The Partnership is therefore operated by officers from each Local Planning Authority and funded by the authorities involved.	
Lindsay Frost	Must include adaptations to climate change and isostatic readjustment	The SPD realises that coastal change is inherently linked to climate change, and it is through Local Plan policies, SMPs and Environment Agency advice on sea-level rise rates etc that these factors are taken into account.	No change.
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	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.

Respondent	Comment	Partnership Response	Changes Made
	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.		
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 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.
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.
Robert Wynn and Sons (Tim West)	We read with interest the Coastal Adaptation Supplementary Planning Initial Consultation Document, which sets out the purpose and planned scope for your document. We would very much support your whole coast approach taken by yourselves. We would wish to highlight that there are power generation and transmission sites earmarked for development within your region that will require the movement of large and heavy abnormal indivisible loads. Due to the size and weight of transformers, generators etc project developers should be encouraged to limit the road mileage travelled by such loads. Such sites would include Sizewell C and the onshore connections for the many offshore windfarms planned in your region. Planning guidance should not be a barrier, more so should facilitate the opportunities for beach landing suitable craft	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 2008. In such circumstances, the draft SPD would not be relevant.	No change.

Respondent	Comment	Partnership Response	Changes Made
	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.		
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	<p>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.</p> <p>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 coastal planning policies.</p>	No change.

Respondent	Comment	Partnership Response	Changes Made
	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.		
Michael Powles	East Norfolk and North East Suffolk Our coastlines are under threat from the sea and from the landward side. Eventual inundation of coastal areas from the sea as a result of global warming is now a given. Melting glaciers and disintegrating polar ice caps are visible, measurable and credible. It is not a question of if, but when, we shall be overwhelmed by the sea and/or rivers backing up. The town of Great Yarmouth and much of the rest of the borough is surrounded by water and marshes. The latter are mostly at or below existing sea level. Gt. Yarmouth and parts of Lowestoft are already highly vulnerable to flooding from sea and rivers. If the sea defences are breached salt water could travel long distances inland and flood places like Hickling, Potterheim, areas around Acle and all along the river courses and through the Broads. Volatile shore lines still come and go but long term residents are clear that the overall trend is for the shoreline to retreat inland where not defended. From the landward side the coastline is vulnerable as a result of excessive development over many years, leading to ever increasing levels of human footfall and leisure activities. The trend to	<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 costal adaptation planning policies.</p>	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>seek out natural undeveloped coastline for recreation as opposed to the pre-war habit of holidaying in recognised and organised tourist centres such as, Cromer, Gt. Yarmouth, Lowestoft, Southwold and Felixstowe, has given way to holidaying in venues closer to nature. Such natural venues are increasingly unable to safely meet demand. With almost universal ownership of the motor car; narrow rural roads, coastal public open spaces and small end of the road fishing villages are being regularly overwhelmed by tourists. Increasing holiday accommodation and other infrastructure, such as parking lots, designed to meet demand is simply increasing the problem. Important wildlife areas such as Minsmere, Winterton-Horsey Dunes SAC and Cley, to mention but a few, are under unsustainable threat. Much of the Broads National Park is vulnerable to salt water incursion. The Northern parishes of Great Yarmouth , which are jammed between the river Bure and the North Sea, are filling up with new houses at an alarming rate – leading to ever more human (and canine) footfall on protected areas and vulnerable coastline. Everybody who would like to live in the area cannot be accommodated by trying to fit a barrel into an egg cup. RECOMMENDATIONS Protect essential communications infrastructure from unmanageable pressure, such as the only road connecting the northern parishes of Great Yarmouth to the rest of the borough south of Caister; Limit access to specially protected areas; Put wild life requirements before commercial profits; Prevent all development in areas susceptible to flooding or being cut off and encircled by water; (This could be up to 10 miles from the sea, or even more in some places) . Provide large green public spaces, well behind the immediate shoreline, and closer to major developments and conurbations, to help take the pressure off the shorelines and protected coastal conservation and wildlife areas. Limit parking in or near to</p>		

Respondent	Comment	Partnership Response	Changes Made
	vulnerable and sensitive areas and critical natural sea defences.		
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. 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</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 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.</p>	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>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 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/</p> <p>c. Are the categories identified in section 3</p>		

Respondent	Comment	Partnership Response	Changes Made
	<p>appropriate and comprehensive or should others be identified? The 3 categories are appropriate. d. What guidance on temporary development within the Coastal Change Management Area should be included? The same guidance should be provided for temporary development as that for permanent development in the Coastal Change Management Area. e. What guidance on Roll-back and relocation options should be included? Developers should be provided with information about diverting Public Rights of Way provided by Norfolk County Council at: https://www.norfolk.gov.uk/out-and-about-in-norfolk/public-rights-of-way/public-path-orders#:~:text=The%20Council%20has%20a%20power,Bridleways%20or%20Restricted%20Byways%20respectively. And by Suffolk County Council at: https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-and-planning/ / http://www.suffolkpublicrightsofway.org.uk/home/making-changes-to-the-public-rights-of-way-network/ f. What guidance on enabling development should be included? Developers should be provided with a copy of 'GG 142 Walking, cycling and horse-riding assessment and review' to ensure any infrastructure relating to development considers all Non-Motorised Users equally. Developers should consult the Norfolk Rights of Way Improvement Plan which states: Opportunities for development – To consult with the equestrian/driving community and establish where there are particular opportunities to improve access to create multi-use routes away from roads.' Developers should be aware of the District or Borough Councils guidance on Public Path Orders as the local planning authorities responsible for changes to the Public Rights of Way Network with regards to development. 3. OTHER COMMENTS Within Norfolk and Suffolk, there is a both a demonstrable demand for safe</p>		

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

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

Respondent	Comment	Partnership Response	Changes Made
Norman Castleton	The routes to obtaining the necessary finance.	The draft SPD provides some guidance relating to funding development and/or coastal management measures. However, the purpose of the SPD is not to provide financial assistance but to aide the implementation of coastal adaptation planning policies.	Identify potential funding mechanisms for the implementation of coastal 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.
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	Support and comment noted. The rollback development mentioned forms part of the case studies appended to the draft SPD.	No change.

Respondent	Comment	Partnership Response	Changes Made
	North Norfolk District Council 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 overcoming issues in the future. Please do contact me in the first instance should this be of interest.		
Nigel Doyle	Further to the consultation that you are currently undertaken, please find attached a copy of a Chief Officer's note on the subject recently produced, following consultation, in Cornwall. The topics in it seem equally relevant to East Anglia and hopefully it will assist. Attachment: https://eastsuffolk.inconsult.uk/gf2.ti/af/1172354/300644/PDF/-/final-chief-planning-officer-note-planning-for-coastal-change-march-2020.pdf	The content of Cornwall Council's planning note on coastal change from March 2020 addresses coastal adaptation planning policy from the Cornwall Local Plan, relevant Shoreline Management Plans and while the policies are different to those set out in the SPD area some of the context is relevant, particularly in relation to national policy, guidance and legislation.	No change.
Norfolk Coast Partnership (Gemma Clark)	Some general comments include:- How the Heritage Coast designation is included as part of the safeguarding of the coast Tools such as LCA and LVIA's and their importance in addressing landscape impact. The role of AONB's both in protecting our coast and through working in partnership finding opportunities for enhancement that benefits landscape, biodiversity and people.	The draft SPD provides guidance relating to coastal adaptation planning policies and the impact of the implementation of such policies on environmental designations, to avoid harm and ensure appropriate mitigation where necessary.	No change.
Norfolk County Council - Lead Local	Please ensure reference to the LLFA Guidance document and its contents is included. This document and the principles	The draft SPD provides guidance on the implementation of coastal adaptation planning	No change.

Respondent	Comment	Partnership Response	Changes Made
Flood Authority (Sarah Luff)	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.	policies. However, the draft SPD also sets out the roles of responsibilities of organisations operating and managing on the coast.	
Felixstowe Town Council (Ash Tadjrishi)	A) Mapping Good mapping is desperately needed, and essential, including but not limited to: Precise seaward and landward extent of the CCMA's 30m zone. The mapping in the LP is inadequate. This should be done at scales appropriate to the area involved: in built up areas large scales are essential. For HTL areas, the new LP extends part of the concept from the CCMA to define an area of typically 30m from current defences to ensure future maintenance access is not inhibited, and where appropriate to require Erosion Vulnerability Statements to be provided in planning applications. The SPD should map those areas at large scale so that all parties can see the implications clearly. Similarly, "coastal maps" for individual areas should clearly incorporate the SMP designations, at scales appropriate to the type of location. They should also contain easily used links to the current EA Flood Zone mapping, or software can be utilised, direct to that from the EA website. B) Implications for resort frontages. In coming decades seafront infrastructure will be directly affected by Sea Level Rise. Promenades and their immediate hinterlands (e.g. in Felixstowe the Spa Gardens) will need to adapt. Higher and more robust structures will be needed to protect the usability of current assets, possibly glass flood walls, or other wholly new thinking. While this is hopefully some decades	<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 aid 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 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.</p>	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>away, current maintenance and development of resort facilities should be aware of these future issues. In particular the decorative walls to the rear of Felixstowe promenade will need to be replaced with wave-resistant structures, possibly within a decade. Whether by general phrasing, or by locally specific sections, these issues should be outlined. C) Flood risk in South Felixstowe. In South Felixstowe we have a situation with a very low risk of a very severe flood event. i.e. there are two scenarios which the SPD should include in planning advice: i) A very exceptional tidal event could, even today, generate tides a further metre above previous events, and that will become progressively more likely over time. In that event flooding in the Langer Road area could be a metre more severe than in 1953. ii) Even in a less severe event, the possibility should be accounted for that the existing defences could fail, either by damage from severe wave action, or by an operational failure if the flood gates were not 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. 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>		

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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.	<p>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 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>	No change.
Lowestoft Cruising Club (David Bennett)	The Lowestoft Cruising Club (LCC) is located at the western end of Lake Lothing. Our activities encompass cruising local and more extensive waters in sailing and small motor vessels. Our site is subject to flooding during tidal surges. We therefore fully support the Lowestoft Flood Risk Management Project which is shortly to be undertaken with raised sea walls and a flood barrier just east of the current bascule bridge. This should alleviate flooding in Lake Lothing and at the LCC site. The maintenance of an operational port of Lowestoft, which is owned and operated by ABP, is essential to LCC activities. We have been involved in the Planning Inquiry and discussions with Suffolk County Council (SCC) on the construction of the Gull Wing third crossing of Lake Lothing. There are potential adverse impacts on the activities of all vessels operating from the western end of Lake Lothing. There are extensive plans for redeployment of land surrounding Lake Lothing. It is essential that the Coastal Adaption SPD provides guidance on such coastal developments and the consequences for all users of Lake Lothing. It is issues like these that need to be covered by the Coastal Adaption SPD. While they are specific issues, and the	The Partnership has considered these points, but considers in general that they relate more to flood risk than coastal erosion. The flood risk and planning situation 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.	No change

Respondent	Comment	Partnership Response	Changes Made
	Coastal Adaption SPD is covering a large extent of coastline, local issues need to fully considered.		
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 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.	No change
Paul Bailey	The objectives of the SPD are well defined. You are correct the issues are relatively simple; the erosion of land and rise in sea level.... as King Canute clearly demonstrated. The extent of the problem can easily be identified by superimposing or overlaying the two elements on a plan. This would also show the potential inland flooding which would approach from a different direction and enable a rear-guard action plan. But surely, this already exists and current actions are in place to ban residential building and restrict commercial development in the defined areas. Is the purpose of the SPD is to recommend the parameters e.g. 1 kilometre from shore and 5 metres from current high tide level. The implications, this is the really difficult question. The previous analysis would identify assets at risk. These could be graduated on a more detailed risk assessment. Everyone must be involved and consulted, the potential costs and social disruption will be huge. A detailed plan and financial impact analysis needs to be completed as soon as possible. This should be the primary function of the SPD. I	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 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.	No change

Respondent	Comment	Partnership Response	Changes Made
	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 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.		
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.?	<p>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 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 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.</p>	No change

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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 are not just reactionary.	No change
Andrew McDonald	I am writing to raise one particular issue on behalf of a small group of local residents who have been involved recently in leading the opposition to the inappropriate use of Enabling Development in East Suffolk – specifically over the last two or three years in the context of raising funds for river defences. We’d like to offer this point of view on the contents of section 5 of the document, ‘Delivery and Enabling Development’. Previous experience of the proposed (and actual) use of Enabling Development by the then Suffolk Coastal D C (and the statements in sections 3.72-3.74 of the recently adopted East Suffolk Local Plan) give us cause for concern that Enabling Development may be regarded as a policy option, rather than an exceptional mechanism. It is also difficult to determine from the consultation document exactly what form this ‘option’ would take – would ED be used as a fundraising mechanism to defray the cost of relocation? Or would it be used as a mechanism for siting relocated housing in areas which would normally be inaccessible to development? In either case, it is important to take very seriously the restrictions on the use of Enabling Development – as the current Local Plan states, it requires ‘..exceptional individual circumstances..’, and its use in exceptional circumstances ‘... needs to be justified,	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 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.	No change

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	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.		
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 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	The Partnership notes the comments and recognises the challenges that many coastal golf courses face in 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.	No change

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

Respondent	Comment	Partnership Response	Changes Made
	<p>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 and asset, lighting, noise, movement, vibration etc; • Intertidal zone - Heritage assets within the intertidal zone. These could be directly impacted, or as before, could be affected by changes in their settings, for example development in one location resulting in changes to coastal processes affecting heritage assets in another, or as with coastal terrestrial by other factors affecting how they are experienced - for example views to and from, noise, lighting etc. It is also relevant to highlight that there are numerous undesignated heritage assets which are considered of national importance within this zone, but which have not been designated because of the perceived difficulties in preserving and enhancing these in accordance with the statutory duties due to their nature and location. • Marine - Archaeology in and beneath the sea bed, including buried archaeological remains, old land surfaces and the associated palaeoenvironmental evidence that provides information about past climate and environmental changes, as well as artefacts (wrecks or evidence of wrecks). Again, such places could be directly impacted, or as before, could be affected by changes in their settings. Setting of heritage assets The NPPF makes it clear that the setting of heritage assets can contribute to their significance, and in these instances the 		

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	<p>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</p> <p>- Conclusions I hope that you find the above comments</p>		

Respondent	Comment	Partnership Response	Changes Made
	<p>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 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.</p>		
<p>Environment Agency (Martin Barrell)</p>	<p>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</p>	<p>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.</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
	further if required. We would welcome the opportunity to further review the SPD as the document is developed.		
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 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.	Comment noted.	No change
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	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	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>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.</p>	<p>Marine Plan and Shoreline Management Plan, as opposed to the development plan and this draft SPD.</p>	
SCEG - Scratby and California Environment Group (Lodge)	<p>Adaption. As much detail to assure public that adaption is explained and as much guidance given as possible.</p>	<p>Relevant detail on adaptation (including links to other guidance) is provided in the draft SPD.</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
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 reference the need for any	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 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.	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>development affecting or likely to affect the marine environment to have regard to the Marine and Coastal Planning Act 2009, the Marine Policy Statement (2011) and the relevant Marine Plan, in this case, the East Inshore Marine Plan (2014) 4. Proposed content of SPD 4.1 Homes, Businesses, and Communities Affected by Coastal Change The last sentence of paragraph 4.1 should be amended to include estuaries which are also at risk and vulnerable to climate change effects. 4.2 – Coastal Management Measures and Policies This proposed approach is supported. The 2014 Waveney Development and Coastal Change SPD did not reference the Planning Practice Guidance on Coastal Change. This should be referred to under section 4.2 of the emerging SPD. The Suffolk Coast & Heaths AONB Management Plan 2018-2023 is also a material planning consideration and consideration should be given to referencing it under this section of this section of the SPD. 4.3 Development in the Coastal Change Management Area (CCMAs) This section needs introductory text to explain what Coastal Change Management Areas are. We agree that the SPD should cover Permanent and Temporary Development on the coast, Public Realm infrastructure and clarify the requirements for Coastal Vulnerability Assessments. Any guidance should also include estuaries which are also susceptible and at risk from climate change impacts. As the Coastal Adaptation SPD will cover nationally designated landscapes i.e. (the Suffolk Coast & Heaths AONB, The Broads National Park and Heritage Coast) the SPD should highlight the need that all of the developments covered in the SPD will need to satisfy Duty of Regard obligations (Section 85 of CROW Act 2000) to further the purposes of AONB designation. 4.4 Roll back and Relocation Options The AONB support the inclusion of information on roll back and relocation options in the emerging SPD. Given that a proportion of the developments</p>		

Respondent	Comment	Partnership Response	Changes Made
	that may need to be relocated /rolled back may well be relocated/rolled back into nationally designated landscapes therefore the need to consider impacts on the natural beauty of the Suffolk Coast & Heaths AONB and The Broads National Park should be included in this section of the document. 5 Delivery and Enabling Development The AONB support the inclusion of information clarifying the circumstances when enabling development may be supported to deliver public benefits. Some enabling development may be delivered in nationally designated landscapes therefore the need to consider impacts on the natural beauty of the Suffolk Coast & Heaths AONB and The Broads National Park should be included in this section of the document. The Natural Beauty and Special Qualities are defined in the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Qualities Indicators Report V1.8 produced in 2016 by Landscape Design Associates Where enabling development is supported to fund new coastal defences for example the design of any defences should consider all impacts on the natural beauty of the Suffolk Coast & Heaths and on the Broads National Park. The AONB team would like to draw your attention to the 'Suffolk Coastal Sea Defences Potential Landscape and Visual Effects Final Report' and its recommendations commissioned by the AONB and prepared by Alison Farmer as part of the Touching the Tide programme. We 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	Comment noted.	No change

Respondent	Comment	Partnership Response	Changes Made
	time. However, we request to be kept updated and engaged in the later developments of this document.		
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 planning applications.	No change
Deben Estuary Partnership (Christine Block)	No Comment	N/A	No change
Kathryn Newnham	Having viewed this document I am aware that I lack the expertise on coastal erosion, tides etc and in other areas. However i have an interest and awareness on certain points so I would like to try and contribute to your consultation. For many years now i have been environmentally aware of many issues David Attenborough has recently brought to the peoples attention. Whilst plastic is a big issue (PCBs?) I think they should find an environmentally friendly alternative - I would ban its production for many unnecessary uses, and completely when they find an alternative, I think chemicals and pollution both in the sea and air is a huge factor in climate change, as is destruction of the rainforests. To live todays life style where our factories churn out dangerous pollutants, the seas have fertilisers, petro-chemicals, sewage and goodness knows what else pumped into them everyday, mankind will eventually be responsible for its own demise. Along the way destroying all other forms of life. If everybody used things like environmentally friendly products (I have used them for years) along with natural things (Lemon degreases and is a good limescale remover in kettles, Vinegar etc.) our oceans and atmosphere would improve	<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 dredging. However, the SPD will provide guidance to help manage development and rollback/relocation in coastal areas.</p>	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>considerably. So whilst erosion is natural mankind has increased this process dramatically. Sea levels have risen and human activity around our 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 is 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 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</p>		

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	<p>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</p>		

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	<p>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 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.</p>		

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	I also enclose some cuttings recently taken from the mercury about new housing applications, the volume may make you think about what is going on here. I have kept Filby paperwork as I use it to write to the council with my objection.		
Richard Adams	Reference Eyke 21, East Suffolk Council SCLP 12.50 - as I own the south east fence of the mixed use boundaries. - What are your plans for this issue?	The draft SPD is focussed on providing guidance for the implementation of coastal adaptation Local Plan policies, and does not provide guidance for other site allocations.	No change
Anglian Water Services Ltd (Stewart Patience)	No Comment	N/A	No change
Barton Willmore (Will Spencer)	No Comment	N/A	No change
Bidwells (Kate Hammond)	Please do not rule out coastal defence maintenance and improvements. This could be cheaper in the long run! We recommend there is working group established to include landowners to assist with the development of this document and provide more detail and explanation of the issues which are facing property owners and businesses in coastal areas. If you would like to discuss any of these points further please do not hesitate to contact us.	<p>The management approach to the coast (e.g. protect/hold the line, no active intervention etc) is set out in the Shoreline Management Plans, and the SPD cannot change this.</p> <p>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.</p>	No change
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	<p>The importance of camping and caravan parks to the coastal economy is fully recognised by the Partnership.</p> <p>The draft SPD follows policy in providing that 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>	No change

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	<p>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 Council for Examination and includes a specific policy (GSP4, 'New Development in Coastal Change Management Areas') that identifies a CCMA and development considered appropriate within the area. This approach is consistent with National Planning Policy Framework guidance (NPPF, paragraph 167). In the Great Yarmouth example, parts of Caister-on-Sea and Hopton Holiday Parks are located within the CCMA and Seashore Holiday Park is directly adjacent to the CCMA. We endorsed the draft policy identifying holiday and short-let caravans as representing appropriate development that could be provided along the coastal strip in Great Yarmouth. This form of tourist accommodation and use of land by its nature is inherently more flexible, with the ability to easily relocate caravans and adapt caravan developments to respond to changing coastlines over time. In view of this, park operators may accept temporary planning permissions that allows development to be reviewed in light of the actual rate of coastal change. In this way, it is different from other forms of 'permanent' development, such as residential development, and it is appropriate that this is recognised in development plan policy and guidance in the Coastal Adaption SPD. 2. Allow operators to protect their properties from coastal erosion Tourism operators should be allowed to protect their</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 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>	

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	<p>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 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 CCMAAs. 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</p>		

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	<p>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 less risk from coastal erosion either within or outside CCMA's as necessary is critical to helping secure the future of holiday parks and ensuring that the social and economic benefits generated by these developments are not lost. Pg 3/3 18907555v2. We are encouraged that the proposed content for the SPD includes a section on roll-back and relocation options. 4. Consider the SMP in the context of other relevant statutory policy documents We mentioned in (2) above an example when there may be a need to depart from the SMP guidance, and there could be other instances when circumstances dictate this needs to happen. Whilst the SMP provides an important starting point, it is a non-statutory policy document that focuses on coastal defence management planning, rather than having to address the wider social and economic consequences of the intervention categories. Further, SMPs are generally updated very infrequently, often not as frequently as Development Plan documents, and can therefore be out of sync with up-to-date development policies and local development priorities. The example of Great Yarmouth is a case in point. The Borough Council is reviewing its Local Plan, which is at an advanced stage of the review process and is likely to be adopted next year. The current SMP was adopted over 8 years ago, in August 2012, without wider public and landowner engagement. The guidance in the Coastal Adaption SPD needs to reflect the current development priorities for the area and provide flexibility for landowners to protect their interests (including business, jobs, etc for the local economy), where this is possible without unacceptable adverse impacts further along the coastline. It should place statutory development plan policies at the</p>		

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	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.		
Michael Boon	I consider that it is wise for the local authorities who have coastal responsibilities to take a long holistic approach of the coastline as their boundaries on the coast will not align with the specific coastal problems within Shoreline Management compartments. It is essential for the economic well-being of the coastal communities that local authorities tried to maximise the practical needs of villages and settlements within their areas affected by coastal erosion. It is wise to have forward planning on each of the designated SMP coastal compartments as change is accelerating and measures to address this will affect the landward community. It's also necessary to have adaptability in any forward plan to cater for accelerating change caused by significant increased coastal erosion in places and longer-term problems which would be driven by climate change A properly prepared and 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	Shoreline Management Plans make the decisions on the management of the coast and cover wide areas (based largely on 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.	No change

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	<p>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</p> <p>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.</p> <p>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</p>		

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	<p>adjacent to them. I comment further on some examples in an appendix to my response. 4 Proposed Content of the SPD</p> <p>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 Local Authorities and the Shoreline Management Organisation to come up with a joint view in all areas, after full consideration, to negotiate with the environment agency. Vulnerable areas in a time of increasing tidal surges should be identified and the best practice of managing an appropriate coastal defence when necessary needs to be explored on a cost benefit basis. 4. Roll-back and Relocation Options Roll-back and relocation involves the movement of assets currently or soon to be at risk from coastal change Significant assets such as lighthouses at Happisburgh and Orford or Martello Towers along the coast would be key targets for assessment of the movement to less vulnerable locations. Other examples might be coastal holiday cottages now too close to the</p>		

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	<p>coastline, cliffside car parks which is now which are now dangerous to use and holiday villages which need a landward relocation owing to the vulnerability of cliffs. 5. Delivery and Enabling Development With adequate information on the future stability of the coastline areas within the Shoreline Management Program developers would have enough information to decide whether investment for the benefit of the local communities is cost-effective. There could be cases where a developer would be prepared to contribute to sea defence to protect an investment which could be a valuable joint scheme in securing the protection of certain coastal areas. In other parts of the coastline it may be that managed retreat is the only practical policy because any other consideration would not be effective Appendix comments on individual schemes of coastal defence which the local authorities concerned would need to take into account in considering their planning policies relating to the adjacent land I understand that the scope of the document covers the coast from Holkham in Norfolk to Felixstowe in Suffolk and that the coastal zones in Shoreline Management terms are in the provinces of an Eastern and Western area. I also understand that the draft document when finalised will be used in the determination of planning applications within the coastal zone and will be updated on the basis of changes in the coastal regime and climate change. The various compartments into which into which the coastal zone has been divided between Holkham and Felixstowe are very different ranging from high cliffs, flat beaches backed by dunes, low cliffs, a beach dune landscape and river exits to the sea. A policy developed some years ago of protection of certain compartments of the coastal frontage based on the value of development behind the coast has had to be modified in the changing climatic conditions particularly</p>		

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	<p>after the storms of the last few winters. The complexity of a policy which ranges from hold the line to managed retreat is constantly being needed to be reviewed as tidal attack on the frontage becomes more severe and the effects of climate change become more apparent. The varying types of coastline within the area being reviewed does not respect existing administrative boundaries and this means that there needs to be cooperation between the responsible planning authorities who may have more than one type of coast within their administrative areas. This provokes the need for joint working but equally invites the local authorities to be consulted in the type of frontal defence being recommended by the flood defence authority. In the past there has been too much piecemeal defence on vulnerable sections of the 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</p>		

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	<p>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</p>		

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	<p>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 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</p>		

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	<p>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 River Yare in Southtown at Great</p>		

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

Respondent	Comment	Partnership Response	Changes Made
	van Holland to Scheveningen, the extension of the Port of Rotterdam in the Maasvlakte, and also near the extension to the ports of IJmuiden/Amsterdam. The alignment of the Netherlands coast is broadly north-west to south-east whereas that in Norfolk is convex. Dr Waterman was asked at the time, and this was back in the 1980's, whether a similar scheme for coastal defence could be applied in Norfolk. He made the comment of the different shapes of coastline between the Netherlands and Norfolk and cited the effect on movements of sand. The sand feeding of vast quantities of sand in front of Bacton may well provide temporary relief for the terminal but as has been recently seen the sand can be heavily mobile and has been carried south in recent storms into Sea Palling. Further investigation I feel is needed here for the long-term stability of this stretch of coastline.		
Norfolk Constabulary	I have asked NPS Group to send a reply for and on behalf of both Norfolk Constabulary and Suffolk Constabulary.	Comment noted.	No change
RSPB (Ian Robinson)	The scale of change predicted for the coast is immense. Conservation organisations have or are developing landscape-based proposals – RSPB Priority Landscape plans, Wildlife Trust Living Landscape plans. These plans look at integrating and expanding management for nature in accordance with the Lawton principle i.e. bigger, 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.	The draft SPD recognises the importance of 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.	No change

Respondent	Comment	Partnership Response	Changes Made
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	<p>The draft SPD recognises the importance of the natural environment to people, communities and businesses.</p> <p>The draft SPD provides guidance concerning the relationship between the SMP, Local Plan policies, Marine Plans, national policy and various other policy and 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>	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>as adaptation for local communities. Opportunities should be sought to explore habitat enhancement and creation through 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>North Norfolk District Council (Planning Policy Team)</p>	<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; 	<p>Support noted. The draft SPD provides a policy context section that sets out the various national and local policy and guidance documents relevant to coastal adaptation, ranging from Local Plan policies to marine planning and SMPs. This chapter is supported by an 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 set out in the draft SPD.</p> <p>The draft SPD also contains guidance relating to the implementation of rollback and relocation policies,</p>	<p>No change</p>

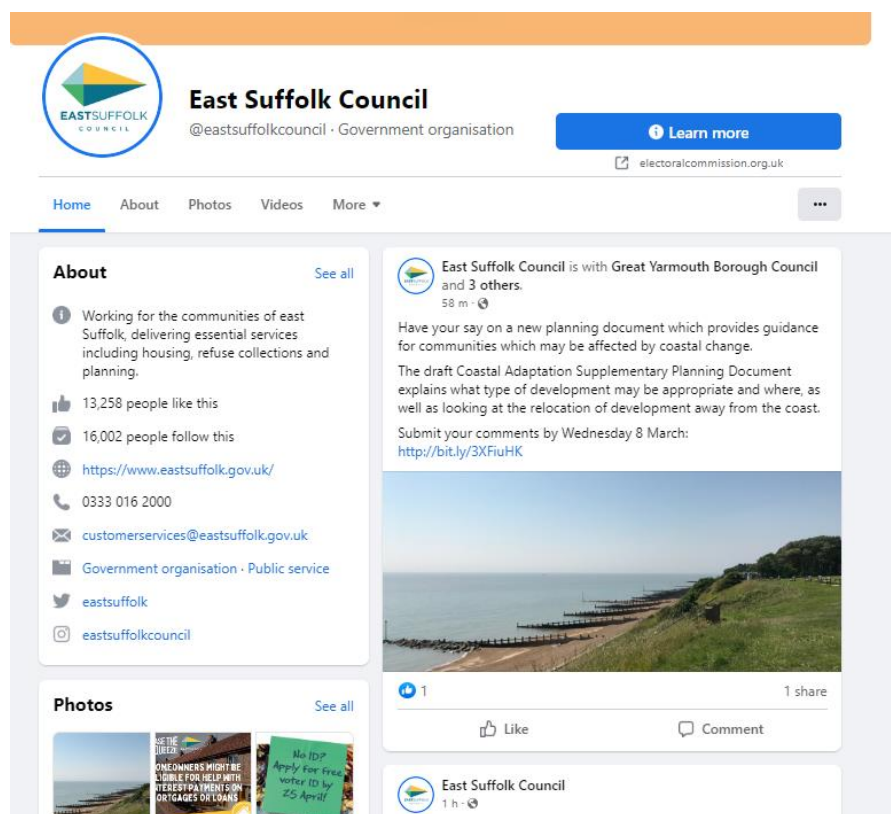
Respondent	Comment	Partnership Response	Changes Made
	<ul style="list-style-type: none"> - give full explanations of the coastal terms used, for example, coastal erosion, coastal adaptation; - explain what types of temporary development would be appropriate within the 50 year and 100 year epochs of the areas designated as Coastal Change Management Areas; - inform what is the required content for a Coastal Erosion Vulnerability Assessment, giving proportionate examples/ template; - 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 landscaping 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. 	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

Appendix 4: Draft consultation promotion material

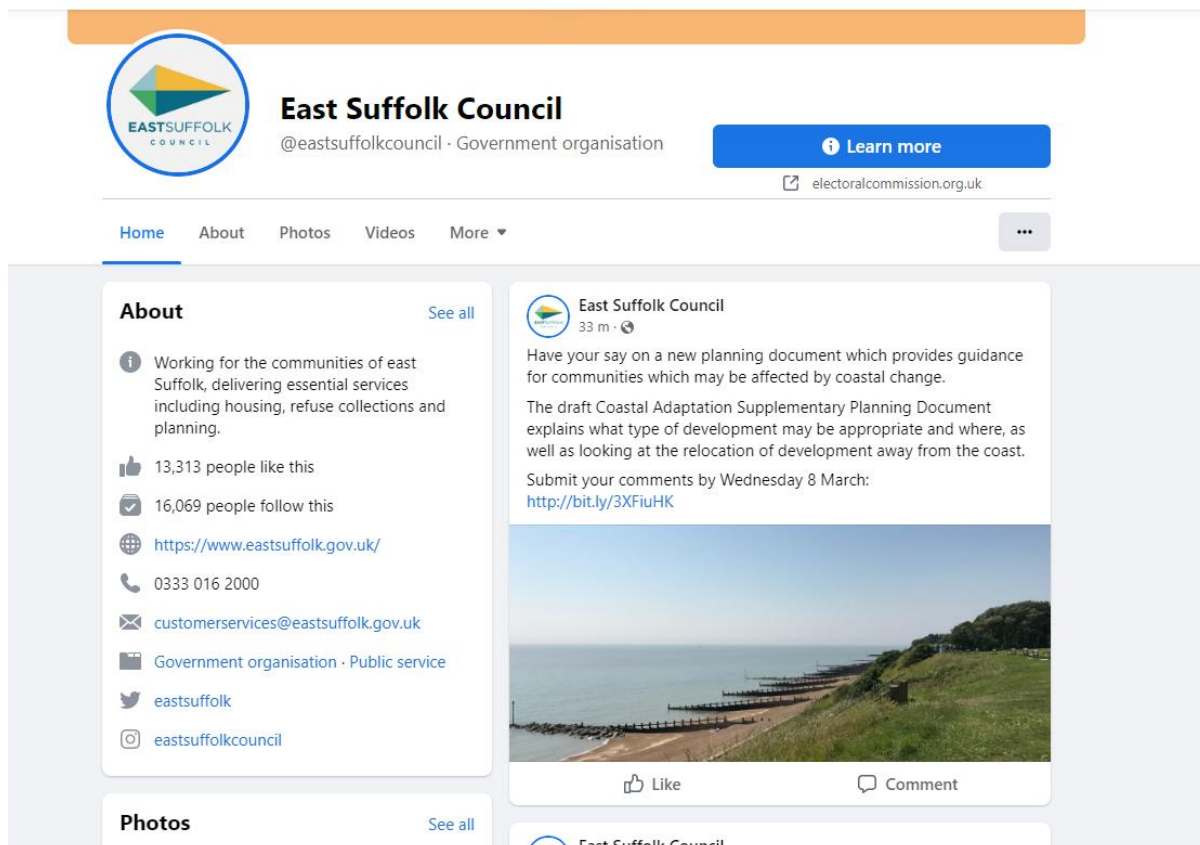
Social media – Facebook and Twitter

Examples provided by East Suffolk Council:

Consultation start 25th January 2023



Two weeks to end of consultation 22nd February 2023



Press release – joint press release by the Partnership authorities.



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Have your say on new planning document

Posted by on 23 January 2023 | Comments

Residents in East Suffolk, Great Yarmouth and North Norfolk are invited to have their say on a new document which provides planning guidance for coastal communities that may be affected by changes to the coast.

A consultation on the draft Coastal Adaptation Supplementary Planning Document (SPD), which provides guidance on the planning policy approaches along the coast from Holkham in Norfolk to Landguard Point, Felixstowe in Suffolk, begins on Wednesday 25 January.

A partnership of East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, the Broads Authority, and the shared Coastal Partnership East team have prepared the draft SPD to support the implementation of Local Plan policies related to the coast. The document provides detailed guidance for residents, developers, businesses and landowners on the interpretation of policies to help ensure coastal communities continue to prosper whilst adapting to coastal change. The draft SPD includes some 'best practice' case studies from across the combined area.

Cllr David Ritchie, East Suffolk Council's cabinet member for Planning and Coastal Management said: "This joint document will help shape future planning decisions in East Suffolk's coastal communities and I would encourage residents who may be affected by coastal changes to view the draft document and contribute their comments."

Cllr Carl Smith, Leader of Great Yarmouth Borough Council said: "Effective management of our coast and how we adapt to the effects of coastal change are of fundamental importance to the continued sustainable enjoyment of our coast and our economic development.

"This new document will help ensure the Great Yarmouth area can continue to prosper by providing detailed guidance for developers, landowners and other relevant individuals and organisations by increasing our resilience, innovation and vitality. With that in mind, we would very much urge people to take part in this consultation and provide feedback that will help us and our partners provide a robust and effective framework for the future."

Cllr Andrew, Brown, North Norfolk District Council's portfolio holder for Planning and Enforcement said: "This document is the result of several authorities agreeing to work together to ensure we make better informed planning decisions in future. It is important to engage with our residents in North Norfolk and this consultation delivers the opportunity to test and receive opinion on the best way forward. The proposals once adopted will give support to interpreting policies in the emerging Local Plan for our district and ensure our coastal communities can continue to thrive notwithstanding the challenges from climate change in the years ahead."

Cllr Harry Blathwayt, Chair of the Broads Authority Planning Committee said: "We are seeking views from all members of the local community about the proposed planning guidance, to ensure that Coastal Communities continue to prosper and can adapt to coastal change."

This consultation is now closed.

All comments received will be considered and taken into account when finalising the Coastal Adaptation SPD, which is aiming to be adopted in summer 2023.

Once adopted, the SPD will be a material consideration in determining relevant planning applications.

Paper copies of the Draft SPD and Consultation Statement have been made available for inspection at all libraries in East Suffolk and the Council's Customer Service Centre at The Marina, Lowestoft, and in Felixstowe and Woodbridge libraries.



Poster



Have your say

Draft Coastal Adaptation Supplementary Planning Document

Consultation period
Wednesday 25th January to 5pm Wednesday 8th March 2023

What are we doing?

Comments are invited on a new planning document which provides guidance for communities that may be affected by changes to the coast.

A partnership of East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, the Broads Authority, and the Coastal Partnership East Team have prepared the draft document to support the implementation of Local Plan policies related to the coast. The document provides detailed guidance for residents, developers and landowners on the interpretation of policies for a whole coast approach with case study best practice to ensure coastal communities continue to prosper and adapt to coastal change.



How can you get involved?

GIVE YOUR VIEWS

Visit the website below to view and comment on the draft document. Paper copies of the draft SPD and Initial Consultation Statement are also available to view in libraries and the Council's Customer Service Centres. Please contact us if you need any assistance in viewing the documents.

All comments received will be considered and taken into account when finalising the SPD. Once adopted, expected Summer 2023, the SPD will be a material consideration in determining planning applications.



Find out more and give your views:

[www.eastsuffolk.gov.uk/
planning-policy-consultations](http://www.eastsuffolk.gov.uk/planning-policy-consultations)

Alternatively, please send comments to:
East Suffolk Council, Planning Policy & Delivery
Team, Riverside, 4 Canning Road, Lowestoft,
Suffolk NR33 0EQ

planningpolicy@eastsuffolk.gov.uk
 01394 444557 / 01502 523029

Appendix 5: Draft consultation responses

The table below lists the consultation responses to draft SPD consultation, the Partnership response and changes made to the SPD. Please note that in the Comment column any page and paragraph numbers relate to the Draft Coastal Adaptation Supplementary Planning Document (January 2023).

Chapter 1 Introduction

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
Paragraphs 1.1 - 1.4	Andy Smith (Cllr, Port Ward Felixstowe Town Council)	103	<p><u>ESC Consultation on Draft Coastal Adaptation Supplementary Planning Document</u></p> <p><u>Response by Councillor Andy Smith, Port Ward, Felixstowe Town Council</u></p> <p>I note with regret that no mechanism of response via email is provided. I therefore present my main body of comment at this point, under the section “Introduction”.</p> <p>Summary</p> <p>I welcome the opportunity to comment on the proposed SPD.</p> <p>However, I have major concerns about the SPD as currently formulated, of a general but fundamental nature supported in some places by comment on individual sections. See Conclusion below.</p> <p>FTC responded to the earlier Consultation, based more narrowly on Coastal Adaptation and the application of Coastal Change Management Areas. It is greatly regrettable therefore that the</p>	<p>While the partnership authorities’ preferred form of consultation response is via the online consultation portal, we accepted email and postal responses as advertised on the consultation portal.</p> <p>Flood risk and coastal erosion risk are heavily interrelated, which is consistent with the Coastal Change Management Area definition set out in the NPPF, as noted by the respondent. It is therefore important that planning policies address both flood and coastal erosion risk. The partnership authorities’ local plans tackle this through a suite of planning policies, some of which primarily address coastal</p>	<p>The Introduction and the end of chapter 3 have been amended to explain the planning policy landscape in relation to flood risk and coastal erosion risk and how consideration of both flood and coastal erosion risk will be assessed on a site-specific scale.</p> <p>The CCMA is defined in paragraph 3.6 and the glossary. Paragraph 3.6 has been amended to clarify that the SPD covers coastal erosion and landslip. Definitions for permanent flood inundation and coastal accretion have been added to the glossary.</p>

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>previous Consultation Report essentially dismissed those comments, and specifically:</p> <ul style="list-style-type: none"> • “Issues of sea level rise should be addressed by [other agencies] rather than this SPD” • Did not accept the need for improved mapping of both CCMAAs and Flood Risk • Dismissed our request that the SPD include advice for Flood Risk areas, exemplified by the issues in South Felixstowe <p>I would endorse again FTC’s original submission and request that it be included again in this current further consideration of the Draft SPD.</p> <p>I believe that the SPD as currently drafted is incompatible with Government Policy as defined in the NPPF, as outlined below.</p> <p>The central point is that the NPPF, at para. 177, within Chapter 14 “Meeting the challenge of climate change, flooding and coastal change”, states:</p> <p>“[Plans] should identify as a Coastal Change Management Area any area likely to be affected by physical changes to the coast”.</p> <p>And the Glossary (page 65 of the 2021 NPPF) defines a CCMA thus:</p> <p>“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.”</p>	<p>erosion risk, and others address flood risk.</p> <p>The practical implementation of these planning policies is undertaken through two separate assessments; A site-specific flood risk assessment addresses flood risk, and a coastal erosion vulnerability assessment addresses coastal erosion risk. Taken together, these assessments provide a comprehensive assessment of flood and coastal erosion risk for a given development. Site-specific flood risk assessments are required to consider all sources of flooding, including sea flooding.</p> <p>This isn’t to suggest that flood risk cannot be considered through a coastal erosion vulnerability assessment, but that as flood risk will be considered through a site-specific flood risk assessment the duplication of such</p>	

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>Indeed the latter is correctly reproduced in the Glossary to the SPD, but, critically, not addressed in the document in respect of flood risk.</p> <p>Hence the (otherwise very useful) SPD clearly should include not only areas potentially lost to erosion, but also to coastal and estuarial flooding, where not protected by defences with SMP policy of HTL.</p> <p>I base my Conclusion below in regard to the need for Planning advice and interpretation on coastal issues to be consistent around both Erosion Risk and Flood Riak generally, but with the situation in Felixstowe as a prime exemplar of that need.</p> <p>Coastal Management - The Felixstowe Background</p> <p>Felixstowe is a town originally created and now shaped in every way by its relationship with the coast.</p> <p>The main Central and Eastern parts of the town are on high ground with soft cliffs vulnerable in principle to erosion.</p> <p>The southern and most eastern areas are on low ground, historically either marshland or large areas of vegetated shingle, highly vulnerable to flooding. That was graphically and tragically demonstrated in 1953 when 41 people died in the catastrophic tidal flood of 30th January that year. Those victims are commemorated by a flood memorial on Langer Road an Annual ceremony, with more substantial events on major Anniversaries, including the recent events commemorating the 70th Anniversary. They remain as a core part of the community's</p>	<p>assessments can be avoided without affecting the robust assessment of flood and coastal erosion risk.</p> <p>The Introduction and the end of chapter 3 have been amended to explain the planning policy landscape in relation to flood risk and coastal erosion risk and how consideration of both flood and coastal erosion risk will be assessed on a site-specific scale.</p> <p>The CCMA is defined in the text and an amendment has been made in the main document to clarify that this SPD covers coastal erosion and landslip. Permanent flood inundation and coastal accretion have been added to the glossary.</p>	

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>self-awareness, even after the passing of the majority of those involved.</p> <p>However, the town is fortunate now to have good quality coastal defences wholly rebuilt in the 1980s-1990s in the northern areas, and the southern areas via major schemes in the 1980s and 2008 and in 2011/12 for the central area. These were conceived within a context of close cooperation between the EA in regard to Flood Risk and SCDC in regard to erosion. This was essential in that the promenade, sea wall and original groynes system from Cobbolds point to Orford Road were created as a single entity by the former FUDC in 1903 in a wholly integrated way – an early example of ICZM.</p> <p>In that context, the town of Felixstowe has a fundamental interest in the evolution of Planning Policy and practice as it affects the Town.</p> <p>For the South Ward, that can be expressed most clearly as “a very low risk of a very serious event” in regard to flood risk. At least 2 scenarios could apply:</p> <ol style="list-style-type: none"> 1. The flood gates, a fundamental element of the defences, could be left open for a number of reasons, such as access to the town being interrupted in a serious weather event by closure of the only 2 accesses, via the A14 or the old Felixstowe Road / High Road. Sadly that is an all too familiar phenomenon just from traffic events, often 2 or 3 times a year. <p>Or</p>		

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>1. A really serious storm event, perhaps beyond a 1 in 200 years likelihood, could cause the defences simply to be overtopped or breached.</p> <p>Felixstowe and the Coast</p> <p>Many aspects of Felixstowe are shaped around the marine environment, including:</p> <ul style="list-style-type: none"> • Tourism: <p>The town had, from its inception by landowners from c. 1880 onwards a core role of seaside tourism, which we are glad to say continues to thrive and expand some 130 years later.</p> <ul style="list-style-type: none"> • The Port of Felixstowe. <p>The original port was again created in parallel to the first elements of the town in the 1880s as a new port to complement the ancient port of Harwich on the opposite side of the Stour and Orwell Estuary. Likewise, from the 1960s onwards, when it became the first, and remains the largest, container port in the UK, it also continues to thrive and expand.</p> <ul style="list-style-type: none"> • Residential <p>As an extremely pleasant place to live with major residential expansion steadily over the entire period from 1890 onwards, broadly with some 1,000 dwellings constructed in every decade over that time, apart from the two World Wars and a pause in the 2000s and beyond due to a very extended period of development of what became the SCDC Local Plan of 2020.</p>		

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>I therefore welcome in principle the intent to create an SPD with the quoted objective to make the complex and interacting issues around Coastal Management, including both Erosion Risk and Flood Risk, and indeed the interaction between them due to coastal processes, more accessible to Planners and to the public.</p> <p>The Draft correctly identifies in the Introduction and a number of other contexts the concept of Integrated Coastal Zone Management (ICZM) which evolved between 2000 and 2018, with the intent of undertaking coastal management as a whole, on both Erosion and Flood Risk frontages. This in contrast to the segmented approach between those during the post war era, notably from the 1949 Coast Protection Act which gave local Councils in coastal areas both powers and responsibilities for management of coastal erosion. Flood risk during that period was separately managed by an evolving series of authorities, including at different times River Authorities, Water Companies and from 1996 onwards the Environment Agency, as an Arms Length Body of MAFF and later DEFRA government departments.</p> <p>That process finally matured in 2018 with the publication of both a wholly new Flood and Coastal Management (FCERM) strategy by the EA and a new policy statement by DEFRA.</p> <p>(In fact, I was closely involved in the evolution of both of those at national level, at the time being Chairman of the LGA Coastal Special Interest Group, including direct meetings with Ministers and the other senior officials in several government departments, and an appearance at the HoL Select Committee on Coastal issues.)</p>		

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>Additionally Planning policy evolved significantly from 2011 onwards with the advent of the NPPF and its subsequent revisions.</p> <p>Clearly those evolutions were of fundamental interest in Felixstowe, and greatly welcomed, where in our case they are closely intertwined, with the main seafront, promenade and coastal defences created across both frontages by the Felixstowe Urban District Council (FUDC) in 1903, and many related developments thereafter.</p> <p>However, on looking at the Draft SPD as a whole, I am very concerned to see that all of the specific topics and proposed Planning approaches deal only with management of coastal erosion, and almost entirely silent on management of Flood Risk.</p> <p>This is a major missed opportunity for a desperately needed source of comprehensive advice for the Planning Community around Coastal Management as a whole.</p> <p>That issue is most graphically illustrated by the fact that, while SCDC Local Plan Policy SCLP9.3 is identified and correctly used in the context of management of erosion frontages, the companion policy on flood risk frontages, SCLP 12.5, is not mentioned in any context. And that omission is most unfortunately compounded by the fact that the EA apparently had only a minimal level of consultation and response at that time.</p> <p>Felixstowe is fortunate that, with our comprehensive coastal defences listed above, almost our entire frontage is classified in the SMP as Hold the Line (HTL). Hence the issue of CCMAs is not</p>		

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>directly relevant to the great majority of our coast, and accordingly not shown on the CCMA mapping.</p> <p>However, given the tragic history of the town in respect of Flood Risk, that remains a significant element of the Planning regime in the urbanised south of the town, and also in the north to the Golf Course, Deben mouth and Estuary.</p> <p><u>Conclusion</u></p> <p>I am accordingly concerned in the extreme about the total omission of Flood Risk advice in the SPD. That is directly in opposition the fundamental basis of ICZM, espoused nationally and, supposedly, in this document - just for example in the second bullet in in Section 1.1 – “...the interpretation of policies with a whole coast approach.”</p> <p>I suggest therefore that the SPD as currently drafted is not fit for purpose and should be fundamentally re-drafted, in close conjunction with the EA around the entire ICZM and FCERM context. It would also therefore follow that a further full Consultation should be offered on that comprehensive document before the SPD is updated and eventually adopted.</p> <p>I also comment below on certain individual sections, to illustrate and identify the above core concern</p>		
Paragraphs 1.1 - 1.4	Andy Smith (Cllr, Port Ward Felixstowe Town Council)	104	<p><u>ESC Consultation on Draft Coastal Adaptation Supplementary Planning Document</u></p> <p><u>Response by Councillor Andy Smith, Port Ward, Felixstowe Town Council</u></p>	While the partnership authorities’ preferred form of consultation response is via the online consultation portal, we accepted email and postal responses as	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>I note with regret that no mechanism of response via email is provided. I therefore present my main body of comment as the attachment below:</p> <p>Cllr Any Smith comment on draft Coastal SPD.pdf</p>	advertised on the consultation portal.	
Paragraphs 1.1 - 1.4	Andy Smith (Cllr, Port Ward Felixstowe Town Council)	134	<p>Map on P.2</p> <p>I note that the map indicates that the whole area of coast from North Norfolk around to the start of the Port quays in Felixstowe is said to be included- but much of that area is subject to Flood Risk , not Erosion Risk. That omission should be rectified.</p>	The map on page 2 titled 'The area to which the SPD applies' shows, amongst other things, the area covered by Shoreline Management Plans, irrespective of whether the stretch of coast is an erosion or flood risk frontage.	No change
Paragraphs 1.1 - 1.4	Andy Smith	151	<p>I note with regret that this process does not provide a mechanism for comment by email. I therefore present a significant and fundamental comment here, under the entry for "Introduction"</p> <p>Summary</p> <p>I welcome the opportunity to comment on the proposed SPD.</p> <p>However, I have major concerns about the SPD as currently formulated, of a general but fundamental nature supported in some places by comment on individual sections. See Conclusion below.</p> <p>I believe that the SPD as currently drafted is incompatible with Government Policy as defined in the NPPF, as outlined below.</p> <p>The central point is that the NPPF, at para. 177, within Chapter 14 "Meeting the challenge of climate change, flooding and</p>	<p>While the partnership authorities' preferred form of consultation response is via the online consultation portal, we accepted email and postal responses as advertised on the consultation portal.</p> <p>Flood risk and coastal erosion risk are heavily interrelated, which is consistent with the Coastal Change Management Area definition set out in the NPPF, as noted by the respondent. It is therefore important that planning</p>	The Introduction and the end of chapter 3 have been amended to explain the planning policy landscape in relation to flood risk and coastal erosion risk and how consideration of both flood and coastal erosion risk will be assessed on a site-specific scale.

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>coastal change”, states: “[Plans] should identify as a Coastal Change Management Area any area likely to be affected by physical changes to the coast”.</p> <p>And the Glossary (page 65 of the 2021 NPPF) defines a CCMA thus: “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.”</p> <p>Indeed, the latter is correctly reproduced in the Glossary to the SPD, but, critically, not addressed in the document in respect of flood risk.</p> <p>Hence the (otherwise very useful) SPD clearly should include not only areas potentially lost to erosion, but also to coastal and estuarial flooding, where not protected by defences with SMP policy of HTL, or, given that when SMP7 was drafted, estuaries were not required by DEFA guidance, refence current Estuary Plans, or EA Flood Zones 1 &2, or any relevant EA Strategy documents such as exist for the Blyth Estuary should be made.</p> <p>I base my Conclusion below on the need for Planning advice and interpretation on coastal issues to be consistent around both Erosion Risk and Flood Riak generally, in particular relating to issues on the Suffolk Coast between Lowestoft and Felixstowe, where the relationship between those issues on this dynamic coast is critical.</p> <p>Coastal Management – The Suffolk Coast</p> <p>I welcome in principle the intent to create an SPD with the quoted objective to make the complex and interacting issues</p>	<p>policies address both flood and coastal erosion risk. The partnership authorities’ local plans tackle this through a suite of planning policies, some of which primarily address coastal erosion risk, and others address flood risk.</p> <p>The practical implementation of these planning policies is undertaken through two separate assessments; A site-specific flood risk assessment addresses flood risk, and a coastal erosion vulnerability assessment addresses coastal erosion risk. Taken together, these assessments provide a comprehensive assessment of flood and coastal erosion risk for a given development. Site-specific flood risk assessments are required to consider all sources of flood, including sea flooding.</p> <p>This isn’t to suggest that flood risk cannot be</p>	

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>around Coastal Management, including both Erosion Risk and Flood Risk, and indeed the interaction between them due to coastal processes, more accessible to Planners and to the public.</p> <p>The Draft correctly identifies in the Introduction and a number of other contexts the concept of Integrated Coastal Zone Management (ICZM) which evolved between 2000 and 2018, with the intent of undertaking coastal management as a whole, on both Erosion and Flood Risk frontages. This was in contrast to the segmented approach between those during the post war era, notably from the 1949 Coast Protection Act which gave local Councils in coastal areas both powers and responsibilities for management of coastal erosion. Flood risk during that period was separately managed by an evolving series of authorities, including at different times River Authorities, Water Companies and from 1996 onwards the Environment Agency, as an Arms Length Body of MAFF and later DEFRA government departments.</p> <p>That process finally matured in 2018 with the publication of both a wholly new Flood and Coastal Management (FCERM) strategy by the EA and a new policy statement by DEFRA. I was closely involved with both of those processes at national level, in my then role as Chairman of the LGA Coastal Special Interest Group., as well as ESC Cabinet Member for Coastal Management from 2020 to 2019.</p> <p>Additionally Planning policy evolved significantly from 2011 onwards with the advent of the NPPF and its subsequent revisions.</p>	<p>considered through a coastal erosion vulnerability assessment, but that as flood risk will be considered through a site-specific flood risk assessment the duplication of such assessments can be avoided without affecting the robust assessment of flood and coastal erosion risk.</p> <p>The Introduction and the end of chapter 3 have been amended to explain the planning policy landscape in relation to flood risk and coastal erosion risk and how consideration of both flood and coastal erosion risk will be assessed on a site-specific scale.</p> <p>As is noted by the respondent, the SPD cannot conflict with local plan policies or the policies map, and so adjustments and/or caveats relating to CCMA data cannot be set out in the SPD.</p>	

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>Clearly those evolutions were of fundamental interest on Suffolk's vulnerable and dynamic coast and greatly welcomed, where in our case they are closely intertwined,</p> <p>However, on looking at the Draft SPD as a whole, I am very concerned to see that all of the specific topics and proposed Planning approaches deal only with management of coastal erosion, but are almost entirely silent on management of Flood Risk.</p> <p>This is a major missed opportunity for a desperately needed source of comprehensive advice for the Planning Community, and their many clients in the public, both professional and individual, around Coastal Management as a whole.</p> <p>That issue is most graphically illustrated by the fact that, while SCDC Local Plan Policy SCLP9.3 is identified and correctly used in the context of management of erosion frontages, the companion policy on flood risk frontages, SCLP 12.5, is not mentioned in any context. And that omission is most unfortunately compounded by the fact that the EA apparently have had only a minimal level of involvement in production of this draft SPD.</p> <p>CCMAs</p> <p>The creation of the concept of Coastal Change Management Areas in the 2012 NPPF, more fully developed in the 2018 revision was a welcome advance in management of FCERM in the Planning context. SCAR fully supports the concept, but it is essential that its application is correctly implemented in LPs. I refer again to the definitions quoted above.</p>	For the same reason, any future government erosion data cannot be referenced in the SPD if it does not yet exist. That said, as soon as such data is available it can be used to inform the consideration of relevant planning applications.	

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			<p>It is unfortunate therefore that their representation in the SCDC LP does not fully meet that criterion, as below. But I would suggest that the SPD could and should comment more widely in these instances, as follows:</p> <ul style="list-style-type: none"> a. CCMA's are only intended apply where SMP policy, over the 3 epochs, is "HTL". But the lines shown on the SCDC LP are continuous at Sizewell & Aldeburgh, which are HTL. This is clearly inappropriate. and could raise significant issues around planning decisions in those areas. While I understand that the SPD cannot change the LPs themselves, it must surely be appropriate to draw attention to that, and note that Planning Applications would require to be dealt with under Government policy on the above definition, not outweighed in this case by the LP? b. At many parts of the exposed coast, integrated management of adjacent stretches of the coast is critical, but some with erodable, some with flood risk. Indeed erosion to provide sediment , generally further south, is a core concept of Coastal Management. The SPD should make that clear for the wider audience in the Planning context. c. The CCMA definition clearly includes areas "likely to be affected by physical change to the shoreline through <u>permanent inundation.</u>" In the context of coastal or estuarial flooding that would include all areas not defended on a permanent basis, whether indicated directly in the SMP on the coast, or by other policies in the estuaries, e.g the Deben estuary Plan (adopted as a "Material Consideration"), other EA plans as appropriate and EA local policies. 		

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>Accordingly, those areas, very extensive in some cases, should be in due course be shown as CCMA's in any LP revision. While it may be true that in such cases there would likely be advice from the EA in the context of flood zones, for clarity to those without detailed knowledge of those processes in the Planning context such areas should eventually be so identified in the LP, avoiding potential clashes of interpretation by potential planning applicants looking to the LP for guidance. Again, as in (a) above, I appreciate SPD cannot change the LP itself, but surely similar advice as above, should be included?</p> <p>d. In the context of erodable frontages for full implementation of CCMA objectives, erosion maps are needed, which have been promised by DEFRA for a long time now, but are still not available, Should the SPD not also refer to this, and indicate that again any such national policy would prevail over the LP in this context?</p> <p><u>Conclusion</u></p> <p>I am accordingly concerned in the extreme about the total omission of Flood Risk advice in the SPD. That is directly in opposition to the fundamental basis of ICZM, espoused nationally and, supposedly in this document - just for example in the second bullet in in Section 1.1 – “...the interpretation of policies with a whole coast approach.”</p> <p>I perceive therefore that the SPD as currently drafted is a missed opportunity to develop a fuller understanding of ICZM and FCERM in the Planning community and more widely.</p>		

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			<p>I suggest strongly that it should be fundamentally re-drafted, in close conjunction with the EA, centred in the full context of ICZM and FCERM. It would also therefore follow that a further full Consultation should be offered on that comprehensive document before the SPD is updated and eventually adopted.</p> <p>Andy Smith personal comment on draft Coastal SPD.pdf</p>		
Paragraphs 1.1 - 1.4	Andy Smith	164	<p>Map on P.2</p> <p>The map is presented to encompass the whole area of coast from North Norfolk around to the start of the Port quays in Felixstowe. However, much of that area is subject to Flood Risk, not Erosion Risk. If the document is redrafted fundamentally as above, that would then match the map. However, if that is not done, then at the very least the map should be annotated to the effect that the SPD only fully covers areas with Erosion Risk. That omission should be rectified. It is fundamental to and understanding of Coastal Management in relation to both Planning Policy and Development Control, a highly desirable objective.</p>	The map on page 2 titled 'The area to which the SPD applies' shows, amongst other things, the area covered by Shoreline Management Plans, irrespective of whether the stretch of coast is an erosion or flood risk frontage.	No change
Paragraphs 1.1 - 1.4	Anglian Water Services Ltd (Tessa Saunders)	171	<p>1. Anglian Water</p> <p>1.1. Anglian Water is the water and water recycling provider for over 6 million customers in the east of England. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding, including inundation by the sea.</p> <p>1.2. Anglian Water has amended its Articles of Association to legally enshrine public interest within the constitutional make up of our business – this is our pledge to deliver wider benefits to society, above and beyond the provision of clean, fresh</p>	In assessing the coastal erosion risk of development proposals, the bullet points under paragraph 4.39 have been amended to provide certainty that any necessary new and/or altered servicing infrastructure required by the development is fully considered in the coastal erosion vulnerability	The bullet points under paragraph 4.39 (now 4.36) have been amended to highlight the importance of considering the impacts of infrastructure needed to service development.

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>drinking water and effective treatment of used water. Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop.</p> <p>2. Anglian Water and Supplementary Development Plans 2.1. Anglian Water is the statutory water and sewerage undertaker for North Norfolk, The Broads Executive Area, Great Yarmouth and East Suffolk and a statutory consultee under The Town and Country Planning (Local Planning) (England) Regulations 2012. Anglian Water wants to proactively engage with the local plan process to ensure the plan delivers benefits for residents and visitors to the area, and in doing so protect the environment and water resources. As a purpose-led company, we are committed to seeking positive environmental and social outcomes for our region.</p> <p>3. Commentary on the Draft Coastal Adaptation Plan 3.1. Anglian Water recognises the vulnerabilities of the Norfolk and Suffolk coast, particularly heightened due to the impacts of climate change including sea level rise and the increased occurrence of extreme weather events. The dynamics of coastal change are therefore critical for managing the existing built environment and future growth, including roll-back and relocation along this fast-eroding coastline. 3.2. The recent coastal erosion experienced at Hemsby is a reminder of the considerable and rapid pace of erosion when it occurs and the vulnerability of homeowners and businesses located along this coastline, together with essential infrastructure we provide. We continue to work in partnership with local communities and stakeholders to help deliver flood defences and relocate our assets where necessary to protect our network and assets from the risks of coastal erosion. For example, we have recently completed a scheme to lay three</p>	<p>assessment submitted with the planning application.</p> <p>It is not the purpose of this SPD to address detailed planning guidance relating to the assessment of embodied carbon. The sustainability of development proposals, in relation to embodied carbon, is a material consideration in the determination of planning applications.</p>	

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>new sewer pipes in Lowestoft, because existing pipes were at risk from coastal erosion on the beach at the town's Gunton Warren Nature Reserve. This collaboration follows work from the water company in 2020 to support East Suffolk Council's flood alleviation scheme in the town.</p> <p>3.3. Infrastructure resilience is critical to the success of future developments, and we would welcome recognition in the SPD in relation to the need for collective resilience for wider utilities infrastructure including water, electricity, gas, and telecommunications. Anglian Water together with BT and UK Power Networks are collaborating with the National Digital Twin programme to work together on a Climate Resilience Demonstrator (CReDo) to plan a built environment that is more resilient to the impacts of climate change such as flooding and extreme weather.</p> <p>4. Conclusion</p> <p>4.1. Anglian Water recognises the challenges of coastal change along the coastline of Norfolk and Suffolk and the policy positions in relation to the designation of CCMA's and responding to the needs of residents and businesses within vulnerable coastal locations with commensurate measures for roll-back and relocation.</p> <p>4.2. Our key concerns are in relation to the 'temporary and time-limited' nature of development and whether this can be considered as sustainable given the embodied carbon factored into the development and supporting infrastructure for a limited period; and that we support the allocation of sites for the relocation of development through the plan-making process to ensure that sites are robustly assessed through the SEA/SA process regarding their sustainability and long-term resilience to the impacts of climate change.</p>		

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
Paragraphs 1.1 - 1.4	Anne Jones	107	<p>I represent a small family farming company who have lost 5 properties and c.150 acres of land to the sea thus far and have been trying to relocate property and adapt our business for the last 12 years. I therefore have significant experience of trying to make the policies discussed in this SPD work.</p> <p>Our experience has been as follows: we make a proposal to the local authority (ESC) which seems to be entirely in line with the policies which are outlined in this SPD; they respond that it is not acceptable and when we ask for further clarification they refuse to enter into discussion. We have made more than 8 suggestions for relocation of properties lost to erosion and have spent tens of thousands of pounds trying to make the existing policy work for the adaptation of our business with no progress. We have become frustrated and the planning department now sees us as a nuisance. I was therefore keen to read this SPD and hopeful that it would help provide clarification and positive ways forward and the stated objectives would suggest this would be the case.</p> <p>The SPD states 2 objectives;</p> <ul style="list-style-type: none"> • <i>“Ensure Coastal Communities continue to prosper and can adapt to coastal change; and</i> • <i>Provide detailed guidance for developers, landowners, development management teams, and elected members on the interpretation of policies with a whole coast approach.”</i> <p>However, it fails in both these objectives.</p> <p>The document collates the various pre-existing policies but it does not succeed in giving any clarity to those who are faced</p>	<p>The SPD cannot create any new, or change any existing, Local Plan policies. It is intended to provide helpful guidance for the implementation of these policies.</p> <p>Questions of relocation and rollback are rarely simple but the intention is that the SPD is as helpful in this regard as it can be.</p> <p>The details of previous and current attempts of Ms Jones and her family company to secure relocation/rollback are noted, but commenting on the history of individual planning proposals is not within the scope of the SPD.</p> <p>The comments on planning terminology are noted, and</p>	Various simplifications to the text of the SPD have been made throughout the document.

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>with losing their business, homes and livelihood to erosion. Confusion and contradiction remains, making planning to adapt impossible. It uses planning terminology which is vague to the lay person and there is no information on how the policies and approaches should be applied in a positive way to aid adaptation. The planners continue to obfuscate behind the many ambiguities and grey areas making it difficult for us to invest resources in a solution to adapt and grow.</p> <p>I note that in the feedback to the scoping document for this SPD, Kate Hammond of Bidwells had suggested a working party be formed of those people who are dealing with these problems and their experiences and opinion used to scope this document - this seems like a good way forward. I should add I was not able to input to the scoping document as I was not aware of it's existence - none of the public bodies concerned saw fit to inform me of it's existence and our parish council did not bother to input (that alone speaks volumes of the real levels of "engagement and co-creation").</p> <p>The document states that engagement with planning officers and CPE is encouraged ;</p> <p><i>"As with all coastal related development projects, early engagement with the local planning authority and Coastal Partnership East will always be encouraged"</i></p> <p>I have tried to engage with both CPE and the ESC planning department repeatedly and over a number of years and have variously been told by the Chair of CPE that I have wasted too much planning officer time and should stop bothering them, by the Head of Planning and Coastal Management and by senior planning officers that I cannot contact members of their team. I</p>	<p>some simplification of the text will be made.</p> <p>The initial Scoping consultation on the SPD was sent to all contacts on the ESC Planning Policy database.</p>	

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>have also been told by the Head of CPE that relocation is not part of their remit - it is a matter for planning and they can only deal with sea defences. This makes us feel ignored and left with no option but the 'squeaky wheel' approach.</p> <p>With this sort of attitude from the local authority there is no point in producing these sort of documents.</p> <p>The planning team are overworked and their focus appears to be on those things which have government targets, for example, providing the largest number of houses with the minimum hassle. We have been waiting for feedback on an adaptation proposal for months and our architect advises us that there is nothing we can do to progress this and that the local authority do not see this as either urgent or important work. For those living and working on an eroding coastline it is obviously urgent - the sea is not aware of the workloads of the local authority or the fact that housing estates are more important to them. Until this situation is resolved and structures and ways of working put in place with local authorities being targeted with solving these problems there is no point writing large documents in planning terminology.</p> <p>From bitter experience I would suggest the following would help;</p> <ul style="list-style-type: none"> Coastal communities should be involved in decisions about their land, assets and community. There is a lot of rhetoric spouted by the local authority and national bodies about co-creation, engagement and partnership but there is no real engagement and partnership. This 	<p>Coastal communities are involved in the coastal planning process, such as Local Plan production and Shoreline Management Plan preparations/reviews. They are also able to make comments on relevant planning applications. Similarly, there is normally public consultation on changes to national planning policy (e.g. the National Planning Policy Framework).</p>	

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>document needs to outline ways in which actual teamwork and co-creation can be engendered</p> <ul style="list-style-type: none"> There should be positive intent in planning. Instead of treating people who are losing their businesses and property to the sea as a problem to be shut down and as a lower priority than those who have lost nothing, the planning framework should be sufficiently clear to allow them to do something positive to adapt and contribute to the economy and natural environment. These are difficult problems and there needs to be positive and creative input to solve them - this document should include more clarity on how this will work. Our planning system seems to seek to put up constant barriers - planning fees, reports required, expensive consultants to employ, taxes to pay (RAMs , exorbitant CIL payments etc). This is very unhelpful to those who are losing everything and trying to adapt with no resources, no help, no (sorry to mention the c word) compensation. This document should address how this can be improved. One of the North Norfolk case studies mentions a business grant given to help provide access to the planning system to a victim of coastal erosion. This sort of approach would be very helpful if rolled out more widely. The document speaks of large grants given to local authorities - surely a small portion of this could be used in this way to help real life situations to find positive ways to adapt. This would provide practical help for the communities in the frontline and give far more learnings on adaptation than spending it on a vast team of bureaucrats producing 	<p>The Councils, and Coast Partnership East, are working hard to try to improve the situation. The draft SPD mentions (in paras 5.44 and 5.45) two large projects being undertaken with multiple partners and Defra, the Flood and Coastal Resilience Innovation Programme (FCRIP) and the Coastal Transition Accelerator Programme (CTAP)</p>	

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>long reports and who refuse to engage with those who are actually experiencing the annihilation of coastal erosion.</p> <ul style="list-style-type: none"> To come up with positive solutions there is a requirement for consultation, discussion, creativity and teamwork - things which are constantly talked about by the various bodies concerned but need to actually happen in the real world 		
Paragraphs 1.1 - 1.4	Bourne Leisure (Lichfields)	157	<p>The coastline covered by the SPD supports a tourism economy of regional importance. East Suffolk Council recently published its Visitor Economy Strategy (2022-2027). This confirms the Council's commitment to supporting the visitor economy so that it "...can adapt and thrive over the next five years." The Strategy notes that pre-COVID the value of the visitor economy was just under £700m and supported around 11,000 full time equivalent jobs, accounting for 15% of employment in the district. In Great Yarmouth, the visitor economy is worth around £600m and continues to grow.</p> <p>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.</p> <p>Overall, it is considered that the draft SPD proposes a pragmatic approach consistent with adopted planning policy and guidance, appropriately balancing the needs of development (and the local economy) with coastal protection.</p>	Comment noted	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made												
Paragraphs 1.1 - 1.4	Bourne Leisure (Lichfields)	163	<p>Summary</p> <p>Overall, it is considered that the draft SPD has taken a pragmatic approach to balancing the needs of supporting coastal development and the local economy, whilst ensuring adequate provisions are in place to respond to coastal change. We therefore hope the key elements of the draft SPD commented on above will be retained in the next version of the document.</p>	Comment noted	No change												
Paragraphs 1.1 - 1.4	British Pipeline Agency Ltd (Lands Department)	37	<p>Dear Sir/Madam</p> <p>Bacton to North Walsham Pipelines - Affected Consultation</p> <table><tr><td>Our Ref</td><td>2023-6527</td></tr><tr><td>Your Ref</td><td></td></tr><tr><td>Linesearch Ref</td><td></td></tr><tr><td>Location</td><td>633196, 334708 Holkham in Norfolk to Felixstowe in Suffolk Norfolk and Suffolk</td></tr><tr><td>Work Description</td><td>Development in coastal locations, relocation of development away from coastal locations, and enabling development. BPA only affected in the area of Paston - Bacton to North Walsham Pipeline.</td></tr><tr><td>Technician Area</td><td>BAC-NWA</td></tr></table> <p>Thank you for your enquiry regarding the Draft Coastal Adaptation.</p>	Our Ref	2023-6527	Your Ref		Linesearch Ref		Location	633196, 334708 Holkham in Norfolk to Felixstowe in Suffolk Norfolk and Suffolk	Work Description	Development in coastal locations, relocation of development away from coastal locations, and enabling development. BPA only affected in the area of Paston - Bacton to North Walsham Pipeline.	Technician Area	BAC-NWA	Comment noted	No change
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Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>This consultation affects the pipeline system operated by BPA (Bacton to North Walsham Pipeline) in the area of Paston only. Please find attached our GIS map. Before any work (including hand trial holes) starts on site you must consult with BPA. Email landsteam@bpa.co.uk to arrange a free site meeting with one of our Technicians.</p> <p>Your safety is paramount to BPA. In order to protect you from potential injury or death we ask that this safety information is passed to the person that will be carrying out the work.</p> <p>BPA regularly monitor the pipelines and we ask that the following procedures are observed:</p> <ul style="list-style-type: none"> • Before any work (including hand trial holes) starts in the vicinity, a BPA Technician must locate and mark the pipeline(s) on site. • All works within 6m of the pipeline require prior approval by BPA and a BPA Technician must supervise all works within 6m of the pipeline(s). The technician will determine whether a written method statement is necessary before any works proceed. • BPA require a minimum of 7 days' notice to arrange supervision (under normal circumstances). • Heavy vehicle crossing points to be approved before use across the easement. • Any works involving the exposure of the pipeline/s requires a continuous site presence until backfilled (this may mean a security arrangement out of hours). • BPA may require proof of liability insurance depending on the proposed works. • Utility crossings may require a formal crossing consent 		

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			<ul style="list-style-type: none"> No buildings can be located within the pipeline easement. BPA do not charge for the first three days of supervision (this includes site meetings). After that, BPA will charge for any future supervision. <p>When planning works which involve crossing or working within the easement of the pipeline, the following will be requested before works can start:</p> <ul style="list-style-type: none"> A confirmed or proposed programmed start date for the works A detailed description of the proposed works A plan of the work area Drawings and a method statement for the written approval of BPA. <p>For more information about working in close proximity to pipelines please visit http://www.linewatch.co.uk/downloads.php.</p>		
Paragraphs 1.1 - 1.4	Coltishall Parish Council (Becky Furr)	28	<p>Coltishall Parish Council objects to further development in North Walsham due to the impact this is already having on the volume and speed of traffic using Coltishall Village as a through road to get to Norwich.</p> <p>North Norfolk District Council must address the wider impact proposed development will have on neighbouring villages and must exert their duty of care to work with Broadland District Council to find an alternative route.</p> <p>I attach a copy of our village magazine, which contains various articles from the B1150 Special Interest Traffic Group and other members of the public who are working hard to show the threat</p>	The comment relates specifically to North Walsham, Transport matters relating to specific developments – and indeed wider highways matters – are not relevant to this SPD.	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			North Walsham development is having on our roads in Coltishall. Marlpit 2302 FEB.pdf		
Paragraphs 1.1 - 1.4	David O'Brien	5	Will I be able to develop my property ***REDACTED*** I have no plans at present and would gladly abandon the section as valueless. david barry obrien	The comment relates to the development potential of a plot of land, which is not relevant to the SPD. Any questions like this should be directed to the East Suffolk Development Management team	No change
Paragraphs 1.1 - 1.4	Felixstowe Town Council (Ash Tadjrishi)	36	Dear ESC Planning Policy, Thank you for the opportunity to provide comment on the draft Coastal Adaptation Supplementary Planning Document. Please accept the following comment as the Town Council's response to the consultation: <i>The Town Council welcomed sight of the Draft Coastal Adaptation Supplementary Planning Document, found it easy to read with well-laid out clear and precise language. However, it was surprising to note that this document, dealing with coastal adaption, does not detail the impact and relevance of flood risk, given the local plan policy SCLP 9.3 (Erosion Risk) and its companion piece SCLP 9.5 (Flood Risk).</i> Kind regards, Ash Tadjrishi Town Clerk	Flood risk and coastal erosion risk are heavily interrelated, which is consistent with the Coastal Change Management Area definition set out in the NPPF, as noted by the respondent. It is therefore important that planning policies address both flood and coastal erosion risk. The partnership authorities' local plans tackle this through a suite of planning policies, some of which primarily address coastal erosion risk, and others address flood risk. The practical implementation of these	The Introduction and the end of chapter 3 have been amended to explain the planning policy landscape in relation to flood risk and coastal erosion risk and how consideration of both flood and coastal erosion risk will be assessed on a site-specific scale.

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				<p>planning policies is undertaken through two separate assessments; A site-specific flood risk assessment addresses flood risk, and a coastal erosion vulnerability assessment addresses coastal erosion risk. Taken together, these assessments provide a comprehensive assessment of flood and coastal erosion risk for a given development. Site-specific flood risk assessments are required to consider all sources of flood, including sea flooding.</p> <p>This isn't to suggest that flood risk cannot be considered through a coastal erosion vulnerability assessment, but that as flood risk will be considered through a site-specific flood risk assessment the duplication of such assessments can be avoided without affecting the robust assessment of flood and coastal erosion risk.</p>	

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
				The Introduction and the end of chapter 3 have been amended to explain the planning policy landscape in relation to flood risk and coastal erosion risk and how consideration of both flood and coastal erosion risk will be assessed on a site-specific scale.	
Paragraphs 1.1 - 1.4	Godfrey Sayers	9	I understand that this is not simple stuff but like the SMP, the proposals set out here, and to which the public is invited to respond, are not set out in a way that the man in the street can readily understand. People who work along the Norfolk and Suffolk coastline often have a deep understanding of coastal processes and how the sea is interacting with the coastline. Little if any of this will be gathered by documents of this kind. Public meetings and plain English might.	The Partnership has endeavoured to create guidance using plain English and avoiding jargon that can be easily misunderstood. However, there will in some circumstances be a need to use technical language. A glossary has been included at the end of the document which provides definitions for some of the technical language. The SPD has been reviewed and amended to ensure the guidance is written using plain English as far as reasonably possible.	The SPD has been reviewed for plain English and amended accordingly.
Paragraphs 1.1 - 1.4	Happisburgh PC (Jo Beardshaw)	156	Happisburgh Parish Council is keen to respond to the draft Coastal Adaptation Supplementary Planning Document but has	The SPD cannot alter the coastal management policy set out in the relevant Shoreline Management Plan	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>found that the majority of points raised are more generic rather than specific to each part of the document.</p> <p>Happisburgh PC does recognize that the Planning Authority has enabled stakeholders to respond in as easy a manner as is possible but has found that parishioners are generally critical of the document as much in its length as anything else.</p> <p>Fundamentally, and as noted in previous correspondence, an 'Adaptation Policy' <u>will not save the lighthouse, the church, the village inn or the manor house.</u></p> <p>The Council requests that, in view of Happisburgh's iconic, historic features, Happisburgh should be treated as a special case and that funding should be made available for a feasibility study into how technically innovative schemes could protect these features, for the nation, for the foreseeable future.</p> <p>The matter of funding to carry out a scheme is an entirely separate matter and the Council would urge that the important matter at this stage is <u>how</u> these elements of Happisburgh could be protected rather than thinking being restricted by financial practicalities at this stage.</p> <p>The Council earnestly implore you to represent these views to central government as a matter of extreme urgency.</p> <p>The Parish Council has encouraged parishioners to share their thoughts in order to form the following points:</p> <ol style="list-style-type: none"> 1. Parishioners would like an extension of time on the consultation and asks that a drop in event could take 	<p>and national Flood and Coastal Erosion Risk Management Guidance.</p> <p>The consultation has been successful in reaching a wide range of interested parties across the partnership authorities' geography. The consultation response was submitted prior to the end of the consultation.</p> <p>The 6 week consultation on the draft Coastal Adaptation SPD (25 January 2023 - 8 March 2023) is longer than the 4 weeks required by the Town and Country Planning (Local Planning) (England) Regulations 2012, and consistent with the approach to SPD consultations set out in each of the Partnership authorities' Statement of Community Involvement.</p> <p>Most of the detailed points raised are not within the</p>	

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>place so that parishioners can understand implications better</p> <ol style="list-style-type: none"> Parishioners are generally critical of all the investment in studies, reports etc over a period of decades, with very little in the form of activity Parishioners are concerned by the quantity of masonry on the beach and are keen to see properties removed before they create debris on the beach Many parishioners are keen to see the car park rolled back away from the beach as soon as possible before erosion also removes the current car park Parishioners note that no additional properties should be built on the seaward side of the main road Parishioners are concerned for the distress and anxiety involved in the loss of parishioners' homes and the concern that they will not receive compensation. There is a lack of clarity to parishioners as to how much compensation could be received. There is a general lack of understanding regarding CTAP Parishioners note that the houses built to replace the Beach Road houses that were demolished are not 'replacement's' as they were expensive and many have been sold as holiday homes Some parishioners have noted concerns with the erosion of the cliffs at the old caravan park in Happisburgh, where there are still buildings remaining Fundamentally, many parishioners have written to say that they do not understand the document A parishioner has pointed out to the Parish Council that if the sea breaks through the cliffs at Doggett's Lane in Happisburgh, it will flood the Norfolk Broads A parishioner points out the economy and hidden economy within the village, taking into account the 	<p>scope of the SPD to consider/address, but it is agreed (point 3) that properties should be demolished before they collapse. There is no compensation for loss of properties to erosion (point 7), as stated in paragraph 5.6.</p> <p>Further information on the CTAP project will be published publicly over the coming months.</p>	

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			income made by holidays homes & Airbnb's, the caravan park, the jobs associated with them, the cleaners, gardeners & handymen this adds up to a large source of money within the local economy, then on top of this the visitors who rent these and visit the village spend money via the shops & pub and artisan crafters who sell via studios from their homes. All this contribution to the economy would be lost if Happisburgh is lost to the sea		
Paragraphs 1.1 - 1.4	Historic England (Marsh, Andrew)	152	<p>Thank you for consulting Historic England on the Councils' Draft Coastal Adaptation Supplementary Planning 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 when preparing strategies and plans, given that heritage assets are an irreplaceable resource.</p> <p>While we have no specific comments to make, we welcome the preparation of this SPD (including it's numerous references to the historic environment), and will be interested in receiving subsequent consultations on this and related documents.</p> <p>CONCLUSION</p> <p>Finally, we should 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, then please do get back to me. In the</p>	Comment noted	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			meantime, we look forward to continuing to work with you and your colleagues.		
Paragraphs 1.1 - 1.4	Jerry Gerza	108	I think more time and greater publicity for this 66 page consultation (and accompanying documents) is required to enable concerned parties and the general public to give it the scrutiny it deserves.	<p>A good level of responses were received, with 185 representations made by 52 respondents.</p> <p>Furthermore, the 6 week consultation on the draft Coastal Adaptation SPD (25 January 2023 - 8 March 2023) is longer than the 4 weeks required by the Town and Country Planning (Local Planning) (England) Regulations 2012, and consistent with the approach to SPD consultations set out in each of the Partnership authorities' Statement of Community Involvement.</p>	No change
Paragraphs 1.1 - 1.4	Lindsay Frost	25	An important overall consideration that must be emphasised in the introduction and at several places throughout these documents is the need to prevent new developments on very low land or near eroding coasts. This applies to all the SMP areas of East Anglia due to isostatic change (land sinking), and eustatic change (sea level rise) due to climate change. In addition, with more heat energy in the atmosphere storms are likely to be stronger and therefore create more powerful destructive waves, which will increase coastal erosion rates. Policies such as moving infrastructure and housing back from eroding coasts (such as trialled at Happisburgh) should be	It is of course sensible to avoid development in areas at risk of coastal change and is included as part of Coastal Change Management Area which takes into account these factors. The allocation of land for development cannot be set out in the SPD	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			adopted. While the vitality of coastal communities is important, this should not be overruled by the financial costs and community upset caused by losses of properties and infrastructure. So, do not build new developments adjacent to the coast (see maps produced that show future sea levels) or along estuaries and tidal rivers, and where possible move valuable housing and infrastructure to more secure locations inland.	as this is the role of the development plan.	
Paragraphs 1.1 - 1.4	Marilyn Howland	115	<p>Some areas have no coastal prevention all areas should similar defences. I see how our area has crumbled over the years we retired here. Having searched other Countries coastal defences.</p> <p>I find it difficult to understand that a big company like Vanderhall who have engineers who have so much knowledge and are willing to earn brownie points by helping Happisburgh. Should be allowed to offer an opinion.</p> <p>Princess Ann is coming to Happisburgh Lighthouse on 29 March to see for herself the erosion from the top of the lighthouse. As the Lighthouse Patron her concerns are valid.</p>	SPD cannot alter the coastal management policy set out in the relevant Shoreline Management Plan and national Flood and Coastal Erosion Risk Management Guidance.	No change
Paragraphs 1.1 - 1.4	Michael Smith	109	<p>Coastal erosion north of Caister Great Yarmouth - Hemsby, Winterton etc, has been caused by the Scroby Wind Farm.</p> <p>International experts warned Great Yarmouth Council that three things would happen if the turbines were located on Scroby.</p> <ol style="list-style-type: none"> 1. The turbines would cause the sandbank to degrade. 2. A sand bank would form across the access to Yarmouth Harbour 	The offshore windfarm in question, as a Nationally Significant Infrastructure Project (NSIP), is subject to the Development Consent Order regime through the Planning Act 2008, rather than a planning application through the Town and Country Planning Act 1990 and therefore not determined by East Suffolk	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>3. Serious costal erosion would happen north of Caister, Hemsby, Winterton etc.</p> <p>They were correct. The turbines should have been located in deep water east of Scroby.</p> <p>These turbines are coming to the end of their useful life.</p> <p>Remove the turbines and allow the Scroby Sandbank to recover. The coastline will then also start to regenerate north of Caister.</p> <p>Regards</p> <p>Mike Smith</p>	<p>Council but by the secretary of state.</p> <p>Development located seaward of the mean low water mark lies within the marine planning realm as opposed to the terrestrial or land planning system. The SPD therefore cannot provide guidance on the implementation of NSIPs which are governed by National Policy Statements prepared by central government or marine development which are governed by marine plans. The decommissioning of such projects is therefore not a matter that local planning authorities are legally capable of determining. This would be a central government decision.</p>	
Paragraphs 1.1 - 1.4	National Highways (Alice Lawman)	35	<p>Dear Sir/Madam</p> <p>Thank you for consulting National Highways on the Draft Coastal Adaptation Supplementary Planning Document (SPD). It is noted that the document will cover the coastal areas from Holkham in Norfolk to Felixstowe in Suffolk.</p>	Comment noted	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>National Highways is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN).</p> <p>It has been noted that once adopted, the SPD will become a material consideration in the determination of relevant planning applications within coastal areas of Norfolk and Suffolk. Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact on the SRN of a planning application accordingly.</p> <p>Notwithstanding the above comments, we have reviewed the document and note the area and location that is covered is remote from the SRN. Consequently the details of set out within the draft document are unlikely to have an severe impact on the operation of the trunk road and we offer No Comment.</p> <p>Kind Regards</p> <p>Alice Lawman</p>		
Paragraphs 1.1 - 1.4	Nick Scarr	21	<p>Dear East Suffolk Council,</p> <p>Your Reference email sent:</p> <p><i>'Give your views on draft guidance for development within coastal areas Planning policy consultation.'</i></p> <p>You state that: <i>'We would like to hear your views on what types of development may be appropriate along the coast and how communities can adapt to coastal change. The draft Coastal</i></p>	Sizewell C, as a Nationally Significant Infrastructure Project (NSIP), is subject to the Development Consent Order regime through the Planning Act 2008, rather than a planning application through the Town and Country Planning Act 1990 and therefore not determined by East Suffolk	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p><i>Adaptation Supplementary Planning Document covers the coast from Holkham in Norfolk to Felixstowe in Suffolk. ‘</i></p> <p>I would like to add the view that a development such as Sizewell C may not be appropriate.</p> <p>However, you have approved same even though major aspects of the flood risk assessment are based on non-conservative, (non-precautionary) parameters.</p> <p>It puzzles me that you consider this approach appropriate for a flood plain in the eroding coastline of Suffolk.</p> <p>The enclosed papers explain this view from authoritative sources.</p> <p>regards</p> <p>Nick Scarr</p> <p>Scarr, Nick - The potential implications of building Sizewell C in a Suffolk flood plain.pdf</p> <p>Scarr, Nick - Sizewell C's EGA-The Applicants non-precautionary shoreline change assessment for the Greater Sizewell Bay.pdf</p> <p>Scarr, Nick - How Sizewell C could be subject to severe flood risk as early as 2050.pdf</p> <p>Scarr, Nick - SzC Rev.9- How the Regulation of the DCO process could have failed future generations.pdf</p>	Council but by the Secretary of State. The SPD therefore cannot provide guidance on the implementation of NSIPs which are governed by National Policy Statements prepared by central government.	
Paragraphs 1.1 - 1.4	Norfolk & Suffolk Constabularies DOCO Teams	22	As the local Designing Out Crime Officers our role within the planning process is to give advice on behalf of Norfolk & Suffolk Constabularies in relation to, the layout, environmental design	While useful information, the comments do not relate specifically to coastal planning policies and so are	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
	(Stephanie Segens)		<p>and the physical security of buildings, based upon the established principles of 'Designing out Crime'.</p> <p>It is our recommendation that the Coastal Adaptation Supplementary Planning Policy stipulates that any planning applications for commercial or residential new builds or refurbishments within its identified development areas are built to CPTED (Crime Prevention Through Environmental Design) principles / Secured by Design standards. Any transportation infrastructure may require guidance from the Police Counter Terrorism Security Advisor.</p> <p>In addition to this we also request that policy should state for any decommissioned buildings to be appropriately secured or demolished ASAP to avoid criminal activity such as metal theft, anti-social behaviour, criminal damage, arson or drug related activity.</p> <p>Secured by Design Secured by Design aims to achieve a good standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable Natural Surveillance and create a sense of ownership and responsibility for every part of the development.</p> <p>These features include secure vehicle parking, adequate lighting of common areas, defensible space and a landscaping and lighting scheme which when combined, enhances Natural Surveillance and safety. Experience shows that incorporating security measures during a new build or refurbishment reduces crime, fear of crime and disorder. The aim of the Police Service is to assist in the Design process to achieve a safe and secure</p>	not relevant to the content of the SPD.	

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>environment for residents and visitors without creating a “fortress environment”.</p> <p>All new developments should provide a venue that makes the most from the proven crime reduction methodologies of Secured by Design gained from over thirty years policing experience and supported by independent academic research. There are Residential, Commercial, Hospital and Educational Developments Design Guides available from www.securedbydesign.com which explain all of the crime reduction elements of these schemes. They are separated into sections; Section 1: Deals with the development layout and design and all external features and Section 2: Provides the detailed technical standards for various elements of the buildings.</p> <p>The interactive design guide https://www.securedbydesign.com/guidance/interactive-design-guide is also a very good and self-explanatory tool that can walk you through the various elements of designing out crime in a visual manner.</p> <p>he Crime and Disorder Act (1998) Section 17 ‘places a duty on the Police and local authorities, (including in their role as planning authorities), to do all they reasonably can to prevent crime and disorder in its area including anti-social and other behaviour adversely affecting the local environment’ and The National Planning Policy Framework July 2021 requires that; ‘Planning Policies and decisions should aim to achieve healthy, inclusive and safe places which...are accessible so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.’</p>		

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
Paragraphs 1.1 - 1.4	Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	11	<p>Good morning,</p> <p>Thank you for the above consultation.</p> <p>We have also been consulted on this Draft Coastal Adaptation Supplementary Planning Document by Norfolk County Council, and will respond as part of the combined NCC response, rather than directly to yourselves.</p> <p>Kind regards,</p> <p>Rosie Chubbock</p> <p>Flood Risk Officer</p>	Comment noted	No change
Paragraphs 1.1 - 1.4	Norman Castleton	12	No mention here of the Heritage Coast designations and the implication thereof.	Paragraph 3.10 makes reference to the large number of natural and historic environment designations along the coast and the importance of protecting and enhancing these designations. Local Plans do include heritage and landscape policy and considerations.	No change
Paragraphs 1.1 - 1.4	North Norfolk DC Coastal Ward (Victoria Holliday)	38	Seems reasonable	Comment noted	No change
Paragraphs 1.1 - 1.4	Oulton Ben	6	The Broads Authority (BA) should be a partner,	As set out in paragraph 1.1 the Broads Authority is part of the partnership preparing the SPD.	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>(i) under the umbrella of agreement between adjacent Councils and Authorities to support initiatives and working,</p> <p>(ii) Particularly the North-East of the BA's area suffers ingress salinity from North Sea into those local broads; this is of necessary BA concern as regards ecology conservation,</p> <p>(iii) drainage from the Broads Basin all passes out to the North Sea through the River Yare estuary at Great Yarmouth; conversely any defence type of activity to protect Gt.Yarmouth might, it is suggested, increase risk of channeling Tidal Flood up the Broads Rivers to detriment of local commerce, industry, habitation and ecology.</p> <p>There needs to be a wider inclusive partnership.</p>		
Paragraphs 1.1 - 1.4	Overstrand Parish Council (Kelly Batterham)	87	<p>Good Morning,</p> <p>Overstrand Parish Council discussed the above-mentioned document at a Full Council meeting last evening and would like to submit the following comment for consideration:</p> <p>Overstrand Parish Council would like consideration for the inclusion of a section on the important role mature trees play in removing ground water from the cliff area</p> <p>Many thanks</p> <p>Kind Regards</p> <p>Kelly Batterham</p> <p>Clerk to Overstrand Parish Council</p>	<p>The effect of development within the Coastal Change Management Area (CCMA) on cliff stability is required to be set out in a Coastal Erosion Vulnerability Assessment, as set out in the bullet points following paragraph 4.36 of the SPD.</p> <p>Tree planting with new developments is considered a positive approach but would be considered on a case by case basis.</p>	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
Paragraphs 1.1 - 1.4	Robin Sanders	2	The Figure shows that the coastal area includes the rivershore up to approximately the western extent of the Port of Felixstowe but does not include other tidal river area. what has determine that the area covers the Port of Felixstowe frontage but not other tidal river frontages.	The map is indicative and therefore should not be understood to exactly reflect detailed policy boundaries. The geographic area to which the relevant coastal planning policies cover is set out on the partnership authorities' policies maps, which is referred to in paragraph 3.14 of the SPD. The geography of the Coastal Change Management Area is evidenced from the relevant Shoreline Management Plans.	No change
Paragraphs 1.1 - 1.4	Ron Warwick	10	<p>After reading recent articles on the coastal erosion in the UK, I had to respond.</p> <p>We continually see articles on how people's lives are being affected and the huge costs involved with coastal protection, the lack of funding, etc.</p> <p>Then we see the other articles about the Government promoting innovation, cost cutting /saving money, reducing carbon footprint etc. But seldom see these in the same articles.</p> <p>Please spare a few minutes to view my NEW Coastal erosion and Flood solution system presentation which addresses all of these issues. Its innovative, its local, its has potentially lower carbon footprint, its significantly more cost effective than other options currently being used, meaning less funding is needed or getting more for the money available. And then to</p>	The comment relates to marketing information for an engineering solution for coastal change. The SPD does not provide guidance on engineering solutions to coastal change.	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>top it, the installation is simpler with <i>less impact on the environment</i>.</p> <p>***Rest of comment and attachment redacted as marketing information for engineering product***</p>		
Paragraphs 1.1 - 1.4	Sarah Greenwood	143	<p>Please note that this refers to the whole consultation and not just this one section.</p> <p>I am a Happisburgh property owner.</p> <p>The documentation, and the means of response, is not easy for the layperson to understand, let alone make an informed comment. I would like to see the deadline for the consultation extended and 'executive summary' documents provided to present this information in a format that most ordinary people can digest. Workshops could also be held in the villages affected.</p> <p>In my opinion, the pathfinder roll-back scheme in Happisburgh has not worked, original owners of the houses demolished on beach road have sadly passed away before the homes could be rebuilt - the replacement houses are not fully representative of the houses that were demolished - affordable housing should have been built, not executive cottages. What is being done to prevent this happening in the future?</p> <p>It is good that the coastal management schemes are to be joined up.</p> <p>As far as I can tell, this second round of the consultation is formalising the joining up of the shoreline management plans along the coast, and putting into regulation how roll-back schemes will work - e.g. acquisition and position of land etc. As far as I can tell there is nothing specific here on social justice for those affected by the failure of the various levels of government</p>	<p>The SPD cannot alter the coastal management policy set out in the relevant Shoreline Management Plan.</p> <p>The consultation has been successful in reaching a wide range of interested parties across the partnership authorities' geography. The consultation response was submitted prior to the end of the consultation.</p> <p>The 6 week consultation on the draft Coastal Adaptation SPD (25 January 2023 - 8 March 2023) is longer than the 4 weeks required by the Town and Country Planning (Local Planning) (England) Regulations 2012, and consistent with the approach to SPD consultations set out in</p>	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>to provide sea defences. This needs to be clarified or addressed urgently.</p> <p>The CTAP scheme via NNDC is mentioned in the consultation. This seems woefully inadequate for the district of NN. According to RightMove, the average price of a property on beach road over the last year is £240k, so this means residents will only get a fraction of the properties worth if a max of £100k is available per property. £36 Million seems a very small amount for them to be able to do everything they say they will.</p> <p>Happisburgh has the fastest eroding coast in Northern Europe - it should be acknowledged that climate change is only partially responsible for this and that the lack of protection due to existing policies is also a contributor</p>	<p>each of the Partnership authorities' Statement of Community Involvement.</p> <p>The SPD seeks to provide further guidance on Local Plan policies and cannot alter Shoreline Management Plan policy which are already part of a wider national approach to coastal management. The Coastal Transition Accelerator Programme (CTAP) scheme is currently under development and will include local discussions in order to develop possible ways to seek to assist those impacted by coastal change. At present there are no defined proposals as to payments for properties at risk. The figure of £100k was miss interpreted in media reports.</p>	
Paragraphs 1.1 - 1.4	SCAR (Suffolk Coast Acting for Resilience) (Simon Read)	127	Whilst this document is very explicit and thorough over response to and adaptation to coastal change, it fails adequately address the implications of sea level rise and tidal surge events where these affect vulnerable coastal and estuarine locations.	Flood risk and coastal erosion risk are heavily interrelated, which is consistent with the Coastal Change Management Area definition set out in the NPPF, as noted by the	The Introduction and the end of chapter 3 have been amended to explain the planning policy landscape in relation to flood risk and coastal erosion risk and how consideration of both

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			The emphasis is clearly upon exposed coastal locations and insufficient consideration is given to estuaries, which experience an equivalent level of risk but more closely related to flooding against erosion. This reflects the inadequacy of the SMP's and Estuary Strategies to accommodate the continuities and different types of risk and exposure between coast and estuary and their interdependence.	<p>respondent. It is therefore important that planning policies address both flood and coastal erosion risk. The partnership authorities' local plans tackle this through a suite of planning policies, some of which primarily address coastal erosion risk, and others address flood risk.</p> <p>The practical implementation of these planning policies is undertaken through two separate assessments; A site-specific flood risk assessment addresses flood risk, and a coastal erosion vulnerability assessment addresses coastal erosion risk. Taken together, these assessments provide a comprehensive assessment of flood and coastal erosion risk for a given development. Site-specific flood risk assessments are required to consider all sources of flood, including sea flooding.</p>	flood and coastal erosion risk will be assessed on a site-specific scale.

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
				<p>This isn't to suggest that flood risk cannot be considered through a coastal erosion vulnerability assessment, but that as flood risk will be considered through a site-specific flood risk assessment the duplication of such assessments can be avoided without affecting the robust assessment of flood and coastal erosion risk.</p> <p>The Introduction and the end of chapter 3 have been amended to explain the planning policy landscape in relation to flood risk and coastal erosion risk and how consideration of both flood and coastal erosion risk will be assessed on a site-specific scale.</p>	
Paragraphs 1.1 - 1.4	Sudbourne Parish Council (Bill Parker)	153	On behalf of Sudbourne Parish Council I am writing to say we fully support the draft SPD	Comment noted	No change
Paragraphs 1.1 - 1.4	Suffolk County Council (Georgia Teague)	170	SCC has reviewed this SPD and has no concerns or comments to make as the Lead Local Flood Authority.	Comment noted	No change
Paragraphs 1.1 - 1.4	Suffolk Fire & Rescue Service	26	Good morning	Comment noted	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
	(Angela Kempen)		<p>On behalf of the Suffolk Fire and Rescue Service please see our consultation comment for the public consultation - Draft Coastal Adaptation Supplementary Planning Document</p> <p>Suffolk Fire and Rescue Service has considered the plan and are of the opinion that, given the level of growth proposal, we do not envisage service provision will need to be made to mitigate the impact.</p> <p>We would however request that any new proposal regarding build for access or water for fire fighting provision is submitted to the Suffolk Fire and Rescue Service via the normal consultation process.</p> <p>Kind regards</p> <p>Angie Kempen</p> <p>Water Officer</p> <p>Suffolk Fire and Rescue Service</p>		
Paragraphs 1.1 - 1.4	Victor Weston	1	<p>Ref SMP7 noticing EDF included. One of the main objections to the proposed SizewellC is coastal erosion. I fail to comprehend why making it a condition of any approval being contingent on their being required to secure the cliffs of the surrounding area from Dunwich/Minsmere to Thorpeness. Same could be said of Scottish Power Windfarms. There seems an absence of joined up thinking ie to achieve/provide some benefit back to the locality</p>	<p>Sizewell C and the offshore windfarms in question, as Nationally Significant Infrastructure Projects (NSIP), are subject to the Development Consent Order regime through the Planning Act 2008, rather than planning applications through the Town and Country Planning Act 1990 and therefore are not</p>	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
				determined by East Suffolk Council but by the secretary of state. The SPD therefore cannot provide guidance on the implementation of NSIPs which are governed by National Policy Statements prepared by central government.	
Paragraphs 1.1 - 1.4	Water Management Alliance (Elanor Roberts)	34	Having reviewed the document, the WMA has no comments to make.	Comment noted	No change
Paragraphs 1.1 - 1.4	Wells-next-the-Sea Town Council (Greg Hewitt)	31	<p>Good Afternoon</p> <p>Wells-next-the-Sea Town Council has considered the Coastal Adaptation Supplementary Planning Document and would make the following comment:</p> <p>‘The document does not demonstrate an understanding of the flooding issues facing Wells. Someone should be sent to Wells to ensure that there is a better understanding and that the issues are properly addressed.’</p> <p>Having just re-examined the document I fully understand why the Town Council has made this comment. The plan is primarily focused on the coast east of Cromer. The plan does not appear recognise the difference of the section of coast between Holkham and Cley-next-the-Sea. The plan appears to be more focused on gradual coastal erosion and the lost of land and dwellings in those areas. Where the SMP is primarily hold the line, as it is at Wells, there is no room for the relocation of large</p>	Flood risk and coastal erosion risk are heavily interrelated, which is consistent with the Coastal Change Management Area definition set out in the NPPF, as noted by the respondent. It is therefore important that planning policies address both flood and coastal erosion risk. The partnership authorities’ local plans tackle this through a suite of planning policies, some of which primarily address coastal erosion risk, and others address flood risk.	The Introduction and the end of chapter 3 have been amended to explain the planning policy landscape in relation to flood risk and coastal erosion risk and how consideration of both flood and coastal erosion risk will be assessed on a site-specific scale.

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>parts of the settlement; the main risk is surge tides and defence failure, leading to the potential for the sudden loss of life.</p> <p>Yours Sincerely</p> <p>Greg Hewitt</p>	<p>The practical implementation of these planning policies is undertaken through two separate assessments; A site-specific flood risk assessment addresses flood risk, and a coastal erosion vulnerability assessment addresses coastal erosion risk. Taken together, these assessments provide a comprehensive assessment of flood and coastal erosion risk for a given development. Site-specific flood risk assessments are required to consider all sources of flood, including sea flooding.</p> <p>This isn't to suggest that flood risk cannot be considered through a coastal erosion vulnerability assessment, but that as flood risk will be considered through a site-specific flood risk assessment the duplication of such assessments can be avoided without affecting the robust</p>	

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
				<p>assessment of flood and coastal erosion risk.</p> <p>The Introduction and the end of chapter 3 have been amended to explain the planning policy landscape in relation to flood risk and coastal erosion risk and how consideration of both flood and coastal erosion risk will be assessed on a site-specific scale.</p>	

Chapter 2 Context: Homes, Businesses, Communities, and Environment Affected by Coastal Change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
Paragraph 2.1	Norman Castleton	13	I would have thought more realistic just to ban any development near or on the coast	The SPD cannot alter planning policies not can it prescribe that particular areas of land be developed for particular uses; this is the role of the development plan for each local planning authority area.	No change
Paragraphs 2.2 - 2.3	Anne Jones	60	it should be noted that human intervention affects these coastal processes - ie erosion on undefended parts of the coast is made worse by the man made intervention to protect other parts of the coast	Paragraph 2.7 makes clear that the ways in which the coast is managed can impact coastal processes along the coast.	No change
Paragraphs 2.2 - 2.3	Norman Castleton	14	Artificial factors affecting the erosion of the coast such as added harbour and piers.	Paragraph 2.7 makes clear that the ways in which the	No change

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				coast is managed can impact coastal processes.	
Paragraphs 2.2 - 2.3	Robin Sanders	3	The geology is rather oversimplified as the chalk does not form the 'solid' (bedrock) geology for large parts of the area. It would be better to say. "The bedrock becomes younger to the south with London Clay underlying much of Suffolk's coast."	It is technically correct that the solid geology is chalk and clay. Paragraphs 2.2 and 2.3 are intended to provide a brief and simplified overview of the coastal processes and geology of the coast to which the SPD relates. Chalk is referred to as the older formation.	Paragraph 2.2 has been amended refer to the underlying geology rather than bedrock.
Paragraphs 2.4 - 2.8	Andy Smith (Cllr, Port Ward Felixstowe Town Council)	135	Para 2.8 I agree that benefits of the coastal area at risk from coastal change are valuable and to be protected – but “Coastal Risk” must include bot Flood and Erosion Risk “Coastal Change” is intended to mean precisely that.	It is important that clarity is provided in the SPD as to what is meant by coastal change, coastal adaptation, and coastal erosion. Coastal adaptation and coastal erosion are defined in the SPD’s glossary. Coastal change has been added to the glossary. Flood and coastal erosion risk are of course heavily intertwined. However, the focus of the SPD is on providing guidance concerning existing and future development at risk of coastal erosion through the application of specified local plan policies. In order	Coastal change has been defined in the glossary. The Introduction and the end of chapter 3 have been amended to clarify that while flood risk and coastal erosion risk are heavily interrelated, the focus of the SPD is on the application of local plan policies relating primarily to coastal erosion risk.

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
				to provide greater clarity on this matter the introduction of the SPD has been amended to state what is and is not included within.	
Paragraphs 2.4 - 2.8	Andy Smith	165	<p>Para 2.8</p> <p>I agree that benefits of the coastal area at risk from coastal change are valuable and to be protected – but “Coastal Risk” must include bot Flood and Erosion Risk.</p> <p>“Coastal Change” in the NPPF, and in fact in both the SCDC and SCDC LPs is intended to mean precisely that.</p>	<p>It is important that clarity is provided in the SPD as to what is meant by coastal change, coastal adaptation, and coastal erosion. Coastal adaptation and coastal erosion are defined in the SPD’s glossary. Coastal change has been added to the SPD glossary.</p> <p>Flood and coastal erosion risk are of course heavily intertwined. However, the focus of the SPD is on providing guidance concerning existing and future development at risk of coastal erosion through the application of specified local plan policies. In order to provide greater clarity on this matter the introduction of the SPD has been amended to state what is and is not included within.</p>	<p>Coastal change has been defined in the glossary.</p> <p>The Introduction and the end of chapter 3 have been amended to clarify that while flood risk and coastal erosion risk are heavily interrelated, the focus of the SPD is on the application of local plan policies relating primarily to coastal erosion risk.</p>
Paragraphs 2.4 - 2.8	Anne Jones	61	It is undoubtedly the case that some parts of our coast/society benefit from erosion whilst others face total annihilation - this	This is not within the scope of the SPD – the policy for	No change

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			document should address how this can be managed in a fair and just way	protecting (or otherwise) each stretch the coastline is set out in the relevant Shoreline Management Plan.	
Paragraphs 2.4 - 2.8	Anne Jones	63	The Committee for Climate Change in 2018 challenged government to ensure that difficult decisions relating to coastal erosion should be considered, discussed and planned with communities and other relevant stakeholders who have specific responsibilities. A further document in March 2002 entitled 'The just transition and climate change adaptation' further suggests that government must take the inequalities in the impact of climate change and associated coastal erosion on different communities into account when making policy	Noted but this relates to national policy approach and so is beyond the scope of this SPD	No change
Paragraphs 2.4 - 2.8	Bourne Leisure (Lichfields)	158	Importance of the visitor economy – throughout the draft SPD there is reference to the importance of the visitor economy to the local and regional economy. This acknowledgement is important and it is evident this has steered the SPD strategy, ensuring the needs of businesses are considered and given significant weight in the process. This is fundamental to the continued and sustainable enjoyment of the coast.	Comment noted	No change
Paragraphs 2.4 - 2.8	Karen Rick	8	Around 15 to 20 years ago a rock berm was put in place between Scratby and California. Marram grass is now growing forming a natural defence, thus protecting many residential properties and businesses for which it was designed in the first place and there has been no erosion. This has proved most effective and should be maintained.	This structure is maintained where necessary by Great Yarmouth Borough Council.	No change.
Paragraphs 2.4 - 2.8	National Trust (Sandra Green)	110	Para. 2.7 - This section of the coast has important linkages at 'nesses' between the beach and the offshore bank/bar system. Whilst recognising that this is only a high-level overview of coastal processes, we feel that along this coast it is worth highlighting the interaction with the offshore and nearshore bank systems, given their relevance in terms of affecting shoreline behaviour and change. It would also be	The detailed sediment movements and interactions with offshore bank/bar are important considerations for coastal management. However, the purpose of this section of the SPD is to	No change

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			good to acknowledge that trends of sediment movement along this coast not only vary spatially but also temporally. As such, whilst net rates of sediment movement along the beaches are typically southwards, gross rates can vary significantly and in places it is when there is a reversal in drift that the greatest coastal changes are observed.	provide a high level overview of the coastal processes and for this reason it is not considered necessary to amend the SPD.	
Paragraphs 2.4 - 2.8	Norfolk Geodiversity Partnership (Timothy Holt-Wilson)	83	<p>The term geodiversity (used in 2.5) may be unfamiliar to readers. We suggest addition of a definition to the Glossary (Apx 7), as follows:</p> <p>Geodiversity is the variety of rocks, fossils, minerals, natural processes, landforms, soils and waters which underlie and determine the character of our landscape and environment.</p>	Comment noted. Geodiversity has been added to the glossary.	'Geodiversity' has been added to glossary.
Paragraphs 2.4 - 2.8	Norman Castleton	15	I would point out that beach events such as the First Light Festival add very little to the benefit of the coast or its citizens. The beach is free to use anyway and does not take all the development or clearing up costs.	It is of course important that beaches are sustainably used, however, the First Light Festival does not fall under the implementation of planning policies relevant to the SPD.	No change
Paragraphs 2.4 - 2.8	RSPB (Ian Robinson)	88	2.5 It needs to be made clear that inland the natural designations are based on freshwater habitats. Also, the ecotone from sea to broad/freshwater wetland is an important feature connecting habitat types and creating corridors along which species can move	While this is true, it is not relevant to the implementation of coastal planning policies which are discussed in the SPD.	No change
Paragraphs 2.9 - 2.13	Anne Jones	62	should add - fair and just management of our coast	Paragraphs 2.9-2.13 detail the effects of climate change on the coast. Overall management of the coast is set out within the framework of national policy and Shoreline Management Plans	No change

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Paragraphs 2.9 - 2.13	Charsfield Parish Council (Pamela Hembra)	141	Consider the wider aspect of coastal erosion causing a decrease in overall land available for residential and commercial development and the resultant decline in population and industry.	There is plenty of land available for development, which does not require a coastal location, outside the Coastal Change Management Area and away from coastal erosion risk.	No change
Paragraphs 2.9 - 2.13	National Trust (Sandra Green)	111	<p>Para 2.10 - The impact of sea level rise is likely to accelerate the rate of coastal change, as identified, but may also affect where the greatest rates of cliff recession and beach change could be experienced. Climate change and sea level rise therefore also brings increased uncertainty in predicting future coastal changes. A precautionary approach would be to use the highest rates of projected change.</p> <p>The final bullet of para 4.4 notes that the erosion risk is likely to be updated during the life of the CCMA which will need to take account of revised SMP data, and it will need to be flexible enough to account for new data. Planning applications will need to be determined in the light of the available data at the time they are under consideration. New national coastal erosion and flood data is soon (Late 2023/ early 2024) to be released - this should be used as a minimum, but more local studies may still be required to support applications.</p>	<p>Climate change will continue to increase uncertainty in predicting future changes to the coast. Paragraph 2.10 has been amended to highlight this important implication.</p> <p>New flood and coastal erosion data published nationally will of course be of value when considering if and to what extent the CCMA should be altered, and if and the extent to which development proposals will be impacted by coastal change. However, until national data is published it cannot be referenced in the SPD.</p>	Paragraph 2.10 has been amended to highlight the fact that climate change will continue to increase the uncertainty in predicting future changes to the coast.
Paragraphs 2.9 - 2.13	National Trust (Sandra Green)	112	Para 2.12 - the final bullet notes the potential for increased saline intrusion as sea levels rise, this should be expanded to read '...particularly in agricultural land, and sensitive habitats'. This may change how land can be used, for example	Saline intrusion is likely to impact sensitive habitats and agricultural land, and therefore the final bullet point of paragraph 2.12 has	The final bullet point of paragraph 2.12 has been amended to clarify that saline intrusion will impact

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			<p>agricultural use, but also may present opportunities for new coastal habitats to develop.</p> <p>There is a danger that this document promotes protecting every stretch of coast – specifically bullet 4 refers to increased risks to protected habitats. However, preventing coastal change may in itself cause harm to the natural environment and thereby present the greater risk to intertidal habitats and supported species.</p>	<p>been amended to reflect this.</p> <p>The SPD makes no comment on the suitability of protecting specified parts of the coast as this is the role of Shoreline Management Plans. Paragraph 2.7 makes clear that the ways in which the coast is managed can impact coastal processes.</p>	<p>sensitive habitats and agricultural land.</p>
Paragraphs 2.9 - 2.13	Norman Castleton	16	I agree with the above	Comment noted	No change
Paragraphs 2.9 - 2.13	RSPB (Ian Robinson)	89	<p>2.10 The SPD needs to state there are issues and implications from a habitat and species perspective resulting from the loss of foreshore.</p> <p>2.12 Add the following</p> <ul style="list-style-type: none"> -There is an increased risk to and displacement of protected species -Over time there will be a loss of area for recreational activities -There will also, over time be an increase in the cost of repair and maintenance 	<p>The bullet points in paragraph 2.12 have been amended to highlight the increased risk to protected species, and loss of land for recreational activities. Repair and maintenance of coastal risk management structures is identified in the list of bullet points.</p>	<p>The bullet points in paragraph 2.12 have been amended to highlight the increased risk to protected species, and loss of land for recreational activities.</p>

Chapter 3 Coastal Management Measures and Policies

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
Paragraphs 3.1 - 3.2	Norman Castleton	17	Reference to the SCP?	It is not clear what SCP refers to; however, it could be a typographical error and refer to SMP (Shoreline Management Plan). The SMPs to which the SPD relate are set out between paragraphs 3.11 and 3.14.	No change
Paragraphs 3.3 - 3.10	David Beavan (East Suffolk Councillor)	23	If the Environment Agency is to head this strategy, it needs to co-operate better with other agencies. It is not subject to democratic scrutiny except at the government level and I have found the head office very unresponsive to requests for information over Potters Bridge.	It is not clear whether the respondent is referring to the SPD or a strategy mentioned in paragraphs 3.3-3.10. If referring to the SPD, it is important to note that the Environment Agency, while an important stakeholder in relation to coastal adaptation across the country, is not the author of the document. Notwithstanding this the Partnership has proactively engaged with the Environment Agency in the preparation of the SPD and the advice received has been invaluable.	No change
Paragraphs 3.3 - 3.10	John Cary	7	All the above makes perfect sense. However it appears that so called national infrastructure projects can override SMPs ICZMs etc with impunity, e.g. Sizewell C, Eurolink, Sealink etc. What is the point of declaring this area of coastline vulnerable	The purpose and legislative power of this SPD relates to the provision of guidance to support the implementation	No change

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			and an area of outstanding natural beauty if it can be ruined at any moment by national and multinational projects.	of local plans. It is not within the legislative power of SPDs to address matters concerning Nationally Significant Infrastructure Projects (e.g. Sizewell C), which are governed by National Policy Statements prepared by central government.	
Paragraphs 3.3 - 3.10	National Trust (Sandra Green)	113	<p>Para 3.4 - This should refer to FCERM, i.e. both flood and coastal erosion risk management.</p> <p>We recognise that this is a local authority-led document and therefore focuses on coastal erosion. However, given the significant flood risk areas that this frontage covers, we feel that there is too light a touch regarding tidal flood risk. As such we would like to see further expansion of this topic, or alternatively the document needs to be more explicit with regards what is and is not covered. If the latter approach is adopted, we would suggest that there is still a need to signpost additional information sources. It is also worth considering that even if a decision is made to exclude flood risk areas, there may be locations where flooding through overtopping of defences will still need to be considered.</p> <p>Further to our earlier comment, there needs to be clarity regarding how this document addresses tidal flood risk.</p> <p>Para 3.10 - We would like to see more on nature conservation. The document should recognise the need to consider both terrestrial and marine habitats and potential for impacts from both natural and man-made causes. Although</p>	<p>FCERM is included in para 3.3.</p> <p>The focus of the SPD is on providing guidance concerning existing and future development at risk of coastal erosion through the application of specified local plan policies. In order to provide greater clarity on this matter the introduction and chapter 3 of the SPD have been amended to state what is and is not included within.</p> <p>Paragraph 3.10 highlights the number, variety and importance of land and marine based environmental designations along the coast, and that coastal change can</p>	The Introduction and the end of chapter 3 have been amended to clarify that while flood risk and coastal erosion risk are heavily interrelated, the focus of the SPD is on the application of local plan policies relating primarily to coastal erosion risk.

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			coastal recession has potential to result in loss of terrestrial habitats, preventing natural roll back of coastal systems, through construction of defences, will result in loss of critical habitats and supported species within the intertidal zone and may also affect functioning of the wider ecosystem. Similarly impacts on sediment movement, such as through construction of cross-shore defences will have consequences for coastal and marine habitats both locally and further afield.	significantly impact such designations. Paragraph 2.7 also makes clear that the ways in which the coast is managed can impact coastal processes.	
Paragraphs 3.3 - 3.10	Norfolk Geodiversity Partnership (Timothy Holt-Wilson)	82	3.10. It is worth mentioning that important non-statutory nature conservation designations (County Wildlife Sites, County Geodiversity Sites) are present (outside the network of statutorily designated sites such as SSSIs).	It is only right that the SPD highlights the importance of statutory and non-statutory environmental designations. For this reason, paragraph 3.10 has been amended.	Paragraph 3.10 has been amended to highlight the importance of both statutory and non-statutory environmental designations.
Paragraphs 3.3 - 3.10	Norfolk Geodiversity Partnership (Timothy Holt-Wilson)	85	3.10. It may be worth mentioning that important non-statutory nature conservation designations (County Wildlife Sites, County Geodiversity Sites) are present (outside the network of statutorily designated sites such as SSSIs).	It is only right that the SPD highlights the importance of statutory and non-statutory environmental designations. For this reason paragraph 3.10 has been amended.	Paragraph 3.10 has been amended to highlight the importance of both statutory and non-statutory environmental designations.
Paragraphs 3.3 - 3.10	Norman Castleton	18	Agree with the above	Comment noted	No change
Paragraphs 3.3 - 3.10	Norman Castleton	19	Agree with the above	Comment noted	No change
Paragraphs 3.3 - 3.10	RSPB (Ian Robinson)	90	3.10 The SPD should refer to a greater number of protected sites and to ensure that Beach Nesting Birds such as little tern, ringed plover, oystercatcher, and avocet are treated as a key consideration. Providing a link to a map of designations connected to this paragraph would be helpful.	There are a large and wide ranging number of environmental designations relevant to the consideration of planning applications and it would be impractical to refer to them all in the SPD. It is for this reason that the SPD highlights the	Paragraph 3.10 has been amended to highlight the importance of both statutory and non-statutory environmental designations.

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				importance of protecting and enhancing the natural environment with reference to some of the key organisations with duties in this respect, e.g. Historic England and Natural England. However, paragraph 3.10 has been amended to highlight the importance of considering both statutory and non-statutory environmental designations.	
Paragraphs 3.3 - 3.10	Suffolk County Council (Georgia Teague)	185	We welcome the reference of the South East Inshore, and the East Inshore and Offshore Marine Plan, in paragraph 3.8.	Comment noted	No change
Paragraphs 3.3 - 3.10	The Benacre Company (Beverley Buggs)	130	<p>Whilst it only reflects the statutory position in relation to heritage assets and the primacy of the development plan as set out in the Listed Buildings and Conservation Area Act and Planning Acts, we support the specific recognition in the SPD of the importance of natural and historic environment considerations at 3.10 and 3.12 and the recognition that all proposals will be considered against all relevant Local Plan policies of the determining local planning authority and all other material planning considerations at 4.5.</p> <p>The Benacre Estate comprises approximately 8000 acres of land along Suffolk's east coast; this includes four miles of coastline, the Benacre National Nature Reserve and a number of agricultural buildings, some of which are listed, which are</p>	<p>This SPD will not provide guidance relating to bringing former agricultural building into use. Guidance on this matter is addressed in the East Suffolk Council Historic Environment SPD (accessible here: https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/supplementary-planning-documents/). East Suffolk Council is also in the</p>	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			no longer economically viable for farming. It is important that the SPD supports ways of bringing these buildings back into use in other ways.	process of preparing a Rural Development SPD, which intends to address a number matters commonly encountered in rural areas, including farm diversification and the conversion of rural buildings. More information about the preparation of the Rural Development SPD is available here: https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/supplementary-planning-documents/ .	
Paragraphs 3.3 - 3.10	The Marine Management Organisation (David Spray)	106	<p>Good inclusion of Marine Plans and Marine Policy Statement reference. Please see the following recommendations for further development of this section.</p> <p><u>Spatial Reference</u></p> <p>It would be useful for clarity around which plan to use in specific areas to include spatial reference for each plan area. For example; East - Flamborough Head to Felixstowe, and, South East - Felixstowe to West of Dover.</p> <p><u>Marine and Coastal Access Act 2009</u></p> <p>For context around the requirements and roles, for and of, Local Planning Authorities in the context of Marine Planning, it would be useful to have reference to the relevant legislation. In this case Section 58 of the Marine and Coastal Access Act</p>	<p>Given the different geographical areas to which the Marine Plans relevant to the SPD relate (East Marine Plans – Flamborough Head to Felixstowe, and South East Marine Plan – Felixstowe to West of Dover) paragraph 3.8 has been amended to clarify the geographical extent of each marine plan.</p> <p>In order to provide clarity as to the role of Marine Plans in local planning authority plan and decision making, the</p>	<p>Paragraph 3.8 has been amended to clarify the geographical extent of each marine plan.</p> <p>Paragraph 3.9 has been amended to highlight the legal duty placed on local planning authorities by section 58 of the Marine and Coastal Access Act 2009 in relation to making decision that accord with the relevant Marine Plan/s unless material considerations indicate otherwise.</p>

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			<p>2009. The following sub sections relate to the duty of public authorities in the context of Marine Planning.</p> <p>58(1)</p> <p><i>A public authority must take any authorisation or enforcement decision in accordance with the appropriate marine policy documents, unless relevant considerations indicate otherwise.</i></p> <p>58(3)</p> <p><i>A public authority must have regard to the appropriate marine policy documents in taking any decision,</i></p> <p><i>(a) which relates to the exercise of any function capable of affecting the whole or any part of the UK marine area, but</i></p> <p><i>(b) which is not an authorisation or enforcement decision</i></p> <p>Context around these subsections is provided within the legislation.</p> <p><u>Marine Plan Policy and Objective Inclusion</u></p> <p>It may be beneficial to include or signpost particularly relevant policies and objectives in the context of coastal adaptation. This said, a full interpretation of the plans is essential for holistically considering the influence of all marine plan policies and objectives on a proposal or planning decision. Specific policy inclusion may be considered too detailed for this SPD, however inclusion would illustrate the relevance of Marine Plan policies to coastal change decision making,</p>	<p>SPD has been amended with reference to the legal duties placed on local planning authorities by the Marine and Coastal Access Act 2009.</p> <p>The Partnership welcomes the respondent's suggestions in respect of detailed policy considerations, however considers reference to specific marine plan policies to be too detailed for inclusion within the SPD.</p>	

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			<p><u>East Plans</u></p> <p>Most relevant objectives, policies and sections are</p> <p>Objective 9 - <i>"To facilitate action on climate change adaptation and mitigation in the East marine plan areas"</i> - Supporting text includes context around coastal erosion and consideration of climate change by marine users.</p> <p>Policy CC1 - <i>"Proposals should take account of (a) how they may be impacted upon by, and respond to, climate change over their lifetime and (b) how they may impact upon any climate change adaptation measures elsewhere during their lifetime. Where detrimental impacts on climate change adaptation measures are identified, evidence should be provided as to how the proposal will reduce such impacts."</i> - Supporting text provides context around erosion and climate change adaptation</p> <p>Governance supporting text - Paragraph 249 - 252 includes breakdown of relevant coastal change management measures that relate to marine planning</p> <p><u>South Plans</u></p> <p>Most relevant objectives and policies are</p> <p>Objective 6 - <i>"The use of the marine environment is benefiting society as a whole, contributing to resilient and cohesive communities that can adapt to coastal erosion and flood risk as well as contributing to physical and mental wellbeing"</i></p>		

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>Policy SE-CC-1 - relevant to conservation or enhancement of habitats that provide flood defence provision</p> <p>Policy SE-CC-3 - concerns proposals from the South East Plan Area and adjacent plan areas that are likely to have significant adverse impacts on coastal change</p>		
Paragraphs 3.11 - 3.18	National Trust (Sandra Green)	114	<p>Para 3.11 - The SMP objectives stated are not the same as those referred to in the 2006 Procedural Guidance (Shoreline management plan guidance - Volume 1: Aims and requirements - March 2001 (publishing.service.gov.uk)). The text misses miss a fundamental principle of SMP which is to develop 'sustainable shoreline management' policies that achieve long-term objectives for people, nature and heritage, <i>without committing</i> to unsustainable defence practices.</p> <p>An overarching principle of SMP is to develop 'sustainable shoreline management' policies that achieve long-term objectives for people, nature and heritage, without committing to unsustainable defence practices. Also the 2006 procedural guidance states that shoreline management policies should aim to have no negative effect on any coastal processes that assets rely on. And in the 2006 guidance there is an emphasis on maintaining, restoring or, where possible, improving natural and historic assets. Restoration is therefore a key element, i.e. moving beyond what we have got now, to recovering what we used to have.</p>	In order to more fully reflect the objectives of Shoreline Management Plans, the SPD has been amended so that the identified Shoreline Management Plan objectives more clearly align with the guidance provided by the Department for Environment, Food and Rural Affairs.	In order to more fully reflect the objectives of Shoreline Management Plans the bullet points under paragraph 3.11 have been replaced with the objectives set out in the Shoreline Management Plan Guidance Volume 1: Aims and Requirements (March 2006).
Paragraphs 3.11 - 3.18	Norman Castleton	20	Agree with the above only if observed and carried through. Not all the SMP measures were observed or carried through, followed up or reappraised.	Comment noted	No change
Paragraphs 3.11 - 3.18	North Norfolk DC Coastal Ward	39	We don't want to be overly dependent on tourism. Visitor pressure can be harmful.	There are a number of, sometimes competing, objectives for the coast.	No change

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	(Victoria Holliday)			Objectives to support rural tourism, economic growth and prosperity can, if not effectively managed, negatively impact other objective such as the conservation of wildlife and habitats. There is of course a need to balance these and other objectives to ensure success in one objective works constructively with other objectives.	
Paragraphs 3.11 - 3.18	Potters Resorts (Mr Potter)	147	<p>Paragraphs 3.11 – 3.18 are welcomed and supported in setting out the importance of preserving coastal communities and the environmental (built and natural). It is considered that an essential part of achieving the ‘diverse and prosperous economic growth’ aimed for is clear support for, and protection of, major sources of employment within coastal communities. This protection and support should be extended to sectors as a whole rather than being targeted at individual employers.</p> <p>There should be a clear focus on protecting areas that have been subject to considerable investment and as a consequence are substantial regional employers. This reflects the fact that areas and industries where there has been significant investment are often difficult to relocate without support and so cannot easily rely on policies that support the relocation of existing businesses. Existing major employers should be prioritised to ensure any measures taken have the maximum possible impact and the greatest number of jobs protected.</p>	As noted in paragraph 3.12 of the SPD a key local plan objective is to increase our resilience to coastal change and to achieve diverse and prosperous economic growth. The economic benefits of development are of course material considerations in the determination of planning applications.	No change

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Paragraphs 3.11 - 3.18	RSPB (Ian Robinson)	91	3.11 Add in 'to support the adaptation of the natural environment'	The bullet points under paragraph 3.11 have been amended to align more closely with the DEFRA's shoreline management plan guidance. The first and final of these bullet points note the importance of maintaining and improving the environment. Supporting the adaptation of the natural environment in order for it to thrive falls under this objective.	In order to more fully reflect the objectives of Shoreline Management Plans the bullet points under paragraph 3.11 have been replaced with the objectives set out in the Shoreline Management Plan Guidance Volume 1: Aims and Requirements (March 2006).
Paragraphs 3.11 - 3.18	Suffolk County Council (Georgia Teague)	186	Paragraph 3.18 sets out the context of Neighbourhood Planning and how it fits into Local Plans. It is suggested that there could be the inclusion of the 'made' Neighbourhood Plans in the area, as they do become part of the development plan once adopted by the district council.	It is not considered necessary to identify all 'made' neighbourhood plans in paragraph 3.18. However, there is considerable guidance about neighbourhood planning on the Partnership authorities' websites. To ensure such guidance is more easily accessible to readers paragraph 3.18 has been amended to make reference to this guidance.	Paragraph 3.18 has been amended to reference the neighbourhood planning guidance available on the Partnership authorities' websites.
Paragraphs 3.11 - 3.18	The Benacre Company (Beverley Buggs)	128	The SPD does recognise at paragraph 3.12 the objectives of Local Plan and Neighbourhood Plan policies to achieve diverse and prosperous economic growth. This is welcomed. Whilst appreciating the overarching objective to avoid inappropriate development in vulnerable coastal areas, further references	While the Waveney Local Plan policy WLP8.25 (Coastal Change Management Area), and Suffolk Coastal Local Plan policy SCLP9.3 (Coastal	Paragraphs 4.6 and 4.15 have been amended to highlight the difference between Waveney Local Plan and Suffolk Coastal

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			<p>should be made in the SPD to the contribution that all forms of economic activity can make to the local economy. It should also recognise that developments can cumulatively have substantial economic benefits. That said, the SPD references the need to demonstrate 'substantial economic benefits' at paragraphs 4.18 whereas the requirement in the Waveney Local Plan area of East Suffolk is 'economic benefits' (Policy WLP8.25). Notwithstanding the reference to 'substantial economic benefits' in the PPG, the SPD cannot and must not set a higher bar in the Waveney Local Plan area of East Suffolk than is already set out in the development plan.</p> <p>The Benacre Estate comprises approximately 8000 acres of land along Suffolk's east coast; this includes four miles of coastline.</p> <p>Part of the estate is farmed in-hand, the rest is let. There are approximately 90 residential houses, which are let, as well as a few commercial units, a wedding venue/education centre, and woodlands. The Estate employs 18 members of staff.</p> <p>The estate also includes the Benacre National Nature Reserve.</p> <p>There are a number of agricultural buildings, some of which are listed, which are no longer economically viable for farming, and we are looking at ways of bringing these buildings back into use in other ways. It is critical that the SPD, building on policies in the development plan, enables us to do this. We are also looking into diversifying into other areas, as being on the coast we receive many visitors, especially the hamlet of Covehithe, where except for the church, all the land and buildings are owned by the Estate.</p>	<p>Change Management Area) specify that commercial and community uses within the medium and long term CCMA time horizons must demonstrate that they require a coastal location and provide economic and social benefits, the Government's Flood Risk and Coastal Change Planning Practice Guidance makes clear that such development will require substantial economic and social benefits. For this reason, paragraph 4.18 has been amended to highlight the difference between Waveney and Suffolk Coastal Local Plan policies and planning practice guidance.</p> <p>This SPD will not provide guidance relating to bringing former rural building into use. Guidance on this matter is addressed in the East Suffolk Council Historic Environment SPD (accessible here: https://www.eastsuffolk.gov.uk/planning/planning-</p>	<p>Local Plan policies, and the Government's planning practice guidance.</p>

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
				policy-and-local-plans/supplementary-planning-documents/). East Suffolk Council is also in the process of preparing a Rural Development SPD, which intends to address a number matters commonly encountered in rural areas, including farm diversification and the conversion of rural buildings. More information about the preparation of the Rural Development SPD is available here: https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/supplementary-planning-documents/ .	
Paragraphs 3.11 - 3.18	The Benacre Company (Beverley Buggs)	129	<p>Whilst it only reflects the statutory position in relation to heritage assets and the primacy of the development plan as set out in the Listed Buildings and Conservation Area Act and Planning Acts, we support the specific recognition in the SPD of the importance of natural and historic environment considerations at 3.10 and 3.12 and the recognition that all proposals will be considered against all relevant Local Plan policies of the determining local planning authority and all other material planning considerations at 4.5.</p> <p>The Benacre Estate comprises approximately 8000 acres of land along Suffolk's east coast; this includes four miles of coastline, the Benacre National Nature Reserve and a number</p>	<p>This SPD will not provide guidance relating to bringing former rural building into use. Guidance on this matter is addressed in the East Suffolk Council Historic Environment SPD (accessible here: https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/supplementary-planning-documents/). East</p>	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			of agricultural buildings, some of which are listed, which are no longer economically viable for farming. It is important that the SPD supports ways of bringing these buildings back into use in other ways.	Suffolk Council is also in the process of preparing a Rural Development SPD, which intends to address a number matters commonly encountered in rural areas, including farm diversification and the conversion of rural buildings. More information about the preparation of the Rural Development SPD is available here: https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/supplementary-planning-documents/ .	

Chapter 4 Development in the Coastal Change Management Area

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
Paragraphs 4.1 - 4.4	Andy Smith (Cllr, Port Ward Felixstowe Town Council)	136	Para 4.3 This correctly states the role of the SMP – but again, critically, the SMP is based on a “whole coast” approach, in contrast to the draft SPD	The SPD aims to provide coastal planning guidance for a range of interested parties in interpreting planning policies with a whole coast approach.	No change
Paragraphs 4.1 - 4.4	Andy Smith (Cllr, Port Ward Felixstowe)	137	Para 4.4 “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”.	Amendment proposed to paragraph 4.4, bullet point 1 to more accurately reflect the SMP.	The first bullet point under paragraph 4.4 (now paragraph 4.2) has been amended to more

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
	Town Council)		<p>That is not true. The SMP defines the evolution of the 3 possible SMP Policies over time, but certainly not the Rate of coastal erosion, measured by the metre. That topic is intended eventually to be shown by the national Erosion Risk Mapping project. The SPD should mention that, and that that the intention would be for future revisions of the Local Plans to take that into account.</p> <p>The final bullet point attempts to say as much – but wrongly by the reference to the SMP, rather than Erosion Risk Mapping.</p>	Bullet point 5 amendment proposed to refer to any future updated, revised, and adopted erosion risk mapping. Yet to be published erosion risk mapping cannot be referenced in the SPD.	<p>accurately reflect the role of SMP erosion risk areas.</p> <p>The fifth bullet point under paragraph 4.4 (now paragraph 4.2) has been amended to replace reference to the SMP with updated, revised, and adopted erosion risk mapping which takes account of climate risk scenarios.</p>
Paragraphs 4.1 - 4.4	Andy Smith	166	<p>Para 4.3</p> <p>This correctly states the role of the SMP – but again, critically, the SMP is based on a “whole coast” approach, in contrast to the draft SPD</p>	The SPD aims to provide coastal planning guidance for a range of interested parties in interpreting planning policies with a whole coast approach.	No change
Paragraphs 4.1 - 4.4	Andy Smith	167	<p>Para 4.4</p> <p>“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”.</p> <p>That is not true. The SMP defines the evolution of the 3 possible SMP Policies over time, but certainly not the Rate of coastal erosion, measured by the metre.</p> <p>That issue is intended eventually to be shown by the national Erosion Risk Mapping project. The SPD should mention that, and that that the intention would be for future revisions of the Local Plans to take that into account. Indeed so should</p>	<p>Amendment proposed to paragraph 4.4, bullet point 1 to more accurately reflect the SMP.</p> <p>Bullet point 5 amendment proposed to refer to any future updated, revised, and adopted erosion risk mapping. Yet to be published erosion risk mapping cannot be referenced in the SPD.</p>	<p>The first bullet point under paragraph 4.4 (now paragraph 4.2) has been amended to more accurately reflect the role of SMP erosion risk areas.</p> <p>The fifth bullet point under paragraph 4.4 (now paragraph 4.2) has been amended to replace reference to the SMP with updated, revised, and adopted erosion risk</p>

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			<p>relevant Planning Applications subsequent to any national publication and guidance on this topic.</p> <p>The final bullet point attempts to say as much – but wrongly by the reference to the SMP, rather than Erosion Risk Mapping.</p>		mapping which takes account of climate risk scenarios.
Paragraphs 4.1 - 4.4	Bourne Leisure (Lichfields)	159	Development in Coastal Change Management Areas (CCMA)– the draft SPD sets out the types of development within a CCMA that can be appropriate, provided there are clear plans to manage the impacts of coastal change. The acknowledgement that existing buildings, infrastructure and land-use can adapt and diversify to changing circumstances is welcomed, and the holiday park examples provided are very relevant where there is more flexibility to reconfigure sites to respond to coastal change whilst protecting the safety of guests. The Development Matrix in Table 1 and explanatory text is based on sensible assumptions and is a sound basis for assessing development proposals in CCMA's. The Coastal Erosion Vulnerability Assessment (CEVA) requirements are noted. The ability to justify through a CEVA that the 75 year lifetime for non-residential development can be varied is important and rightly should be considered on a case-by-case basis.	Comment noted	No change
Paragraphs 4.1 - 4.4	National Trust (Sandra Green)	116	<p>Para 4.2 - It should be made clear that SMPs consider both flood and coastal erosion risk, not just coastal erosion.</p> <p>Para 4.4 Bullet 1 - Noting that this reflects both the best information available at the time of the assessment being made and how the Government applies the science to the issue; it is possible that driving forces e.g. sea level rise predictions or response e.g. how cliff failure develops have altered since the time the SMP was produced and so such information is indicative. CCMA should be updated to reflect</p>	<p>Para. 4.2 refers to both coastal erosion and flooding, as commented upon.</p> <p>Para. 4.4, Bullet 5 – The National Coastal Erosion Risk Mapping project currently underway considers updated climate scenarios and incorporates the most</p>	<p>The first bullet point under paragraph 4.4 (now paragraph 4.2) has been amended to more accurately reflect the role of SMP erosion risk areas.</p> <p>The fifth bullet point under paragraph 4.4 (now paragraph 4.2) has been</p>

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>the latest predictions and projections e.g. from UKCIP irrespective of whether the SMP has been updated (it remains advisory in nature). Similarly the predictions UK Government applies to the assessment may alter over time and different scenarios of climate change and sea level rise might come into play. A precautionary approach would be to apply the highest predictions for sea level rise and climate change and assess those for zones where such processes may come into play; this may be more cogent going to longer time periods from shorter time periods. As a minimum, the document needs to clarify what assumptions/ scenario is being made for sea level rise SLR (what Representative Concentration Pathway (RCP)?</p> <p>Para 4.4 Bullet 3 - The risk of coastal erosion also relates to cliff height. These factors may vary as the cliff erodes landwards.</p> <p>This bullet could do with a little revising to clarify the point being made regarding the potential for sub-aerial erosion of cliffs in addition to marine erosion. This is an important point for both no active intervention frontages and hold the line frontages, i.e. it will potentially have an impact both within and outside CCMA's. Associated with this, another point that may be worth highlighting is the risk from wave overtopping, which can result in cliff erosion or risk to life even where defences are present. As sea levels rise, the risk of overtopping and therefore erosion/ inland flooding will typically increase, unless defences are modified to address this.</p>	<p>appropriate as set out by government and is likely to update the CCMA's.</p> <p>Para. 4.4, Bullet 3 – Noted, the document is not seeking to explain all aspects of coastal change, a general explanation is provided in earlier chapters.</p>	<p>amended to replace reference to the SMP with updated, revised, and adopted erosion risk mapping which takes account of climate risk scenarios.</p>
Paragraphs 4.1 - 4.4	RSPB (Ian Robinson)	92	<p>4.4 The statement describing the unpredictability of coastal change and erosion is clear and well made, but again there is no reference made to the extent of the coastal zone boundary. This is relevant to for example dredging to source</p>	<p>Activities in the marine environment, such as dredging, would be</p>	<p>No change</p>

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			sands and gravels and deposition of materials for example from the entrance to Lowestoft harbour and change to offshore bathymetry. Movement of these sediments may affect the depth, orientation, and width of the foreshore.	incorporated into Marine Licencing processes.	
Paragraphs 4.5 - 4.14	Aldringham-cum-Thorpe Parish Council (Eric Atkinson)	146	Should the table include risk management measures, ie Coastal Defences?	Amendment proposed to include risk management structures in the list under 'Essential Infrastructure'.	Paragraph 4.5 has been amended to include coastal erosion risk management structures as forms of essential infrastructure.
Paragraphs 4.5 - 4.14	Andy Smith (Cllr, Port Ward Felixstowe Town Council)	138	Table 1 SMP Development Matrix I welcome the principle of such a table as a guide to application of Planning Policies, but that would require more development, again in the contexts of both Flood Risk and of Erosion rates.	Flood risk is not included in this SPD. Each LPA has Local Plan policies regarding flood risk which will be relevant to any development proposal.	No change
Paragraphs 4.5 - 4.14	Andy Smith	168	Table 1 SMP Development Matrix I welcome the principle of such a table as a guide to application of Planning Policies, but that would require significantly more development, again in the contexts of both Flood Risk and of Erosion rates.	Flood risk is not included in this SPD. Each LPA has Local Plan policies regarding flood risk which will be relevant to any development proposal.	No change
Paragraphs 4.5 - 4.14	National Trust (Sandra Green)	117	Para 4.5 - There is no mention of the creation and maintenance of a coastal path in the document. We would like to see the need for continued access recognised, although it does not necessarily mean that a coastal path should be retained in a specific position. Para 4.6/4.7 - Please can it be clarified whether this also includes landfall sites associated with offshore renewables and cabling. Para 4.12 - The emphasis is on development that will be impacted upon. It would seem logical to include how	Opportunities to realign the England Coast Path to areas with a reduced risk of coastal change should be encouraged. For this reason, a new paragraph has been added to the SPD (paragraph 5.28) to set out that development should not hinder future realignment and should seek to	Paragraph 5.28 has been added to the SPD to set out that development should not hinder future realignment and should seek to proactively provide future options for realignment. Paragraph 4.7 has been amended to clarify that wind turbine infrastructure

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>development that seeks to address coastal change impacts or provide approaches to adaptation against the impacts of climate change and sea level rise are viewed. This might e.g. include how the 'coast' itself (what sort of coast) is retained for the future as this may be a very important aspect of the economy.</p> <p>Table 1 Replacement of Development Affected by Coastal Change (non residential) - If this development is for nature conservation, short term action might be critical e.g. maintaining local habitats/genetics/ species etc and so should not be presumed against. There might reasonably be a question to what the longer term action might be but such might require longer term work to be completed before implementation. There should be a distinction drawn in some way between those developments for built infrastructure and those for habitat/environmental purposes. There could be an unintended consequence here. Similarly, the intent to remove a defence to make a cliff more dynamic (for nature conservation / sediment supply reasons) might also be legitimate and could be precluded by such an assessment.</p>	<p>proactively provide future options for realignment.</p> <p>Paragraph 4.7 has been amended to clarify that wind turbine infrastructure constitutes essential infrastructure.</p> <p>In relation to comment made about Table 1, paragraph 5.32 covers habitats affected by coastal change and includes reference to habitat relocation. Habitat replacement would in included in open land uses and has no specific restrictions. Paragraph 4.26 (new paragraph number) has been amended to note that open land uses could provide benefits such as biodiversity net gain and/or habitat creation or replacement.</p>	<p>constitutes essential infrastructure.</p> <p>Paragraph 4.26 (new paragraph number) has been amended to note that open land uses could provide benefits such as biodiversity net gain and/or habitat creation or replacement.</p>
Paragraphs 4.5 - 4.14	North Norfolk DC Coastal Ward (Victoria Holliday)	40	Need to ensure essential infrastructure eg roads are replaced	Transport infrastructure, such as roads, is identified in paragraph 4.4 as a type of essential infrastructure that can be an appropriate within the Coastal Change Management Area.	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
Paragraphs 4.5 - 4.14	North Norfolk District Council (Rob Goodliffe)	70	<p>1. 2025 is very much in the short term/near future and some policy relates to 20 years as short term. Consider rephrasing.</p> <p>2. Although this may not be relevant due to above, it would be if it was 20 years.</p>	The time horizons referenced in Table 1 (short [2025], medium [2026-2055], and long [2056-2105]) have been amended to up to 20, 20-50, and 50-100 years respectively. A footnote to the table has been added explaining that these timeframes will be measured from the date on which the Coastal Erosion Vulnerability Assessment (CEVA) is completed.	The short, medium and long term time frames in Table 1 have been amended to short term (up to 20 years), medium term (20-50 years), long term (50-100 years). A footnote to the table has been added explaining that these timeframes will be measured from the date on which the Coastal Erosion Vulnerability Assessment (CEVA) is completed.
Paragraphs 4.5 - 4.14	The Benacre Company (Beverley Buggs)	131	<p>Whilst it only reflects the statutory position in relation to heritage assets and the primacy of the development plan as set out in the Listed Buildings and Conservation Area Act and Planning Acts, we support the specific recognition in the SPD of the importance of natural and historic environment considerations at 3.10 and 3.12 and the recognition that all proposals will be considered against all relevant Local Plan policies of the determining local planning authority and all other material planning considerations at 4.5.</p> <p>The Benacre Estate comprises approximately 8000 acres of land along Suffolk's east coast; this includes four miles of coastline, the Benacre National Nature Reserve and a number of agricultural buildings, some of which are listed, which are no longer economically viable for farming. It is important that the SPD supports ways of bringing these buildings back into use in other ways.</p>	<p>This SPD will not provide guidance relating to bringing former rural building into use. Guidance on this matter is addressed in the East Suffolk Council Historic Environment SPD (accessible here: https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/supplementary-planning-documents/). East Suffolk Council is also in the process of preparing a Rural Development SPD, which intends to address a number matters commonly encountered in rural areas,</p>	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
				including farm diversification and the conversion of rural buildings. More information about the preparation of the Rural Development SPD is available here: https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/supplementary-planning-documents/ .	
Paragraphs 4.17 - 4.18	Anglian Water Services Ltd (Tessa Saunders)	173	New non-residential development 3.4. Anglian Water are concerned that whilst non-residential development is considered less vulnerable uses in terms of coastal erosion and flood risk, the embodied carbon in providing such development, including the supporting infrastructure for water supply and sewerage, would suggest this is not a sustainable solution to providing resilient development. The short term to 2025, as illustrated by the Environment Agency's Development Matrix (Table 1) is becoming obsolete (unless it is updated with new parameters for short, medium, and long term) and therefore it is questionable whether it is sustainable to provide significant development such as a hotel, leisure uses or offices or whether the investment for such development in CCMA's would be feasible given the risks.	While embodied carbon and the sustainable location of development are matters of significant importance, particularly in relation to climate change, they are not considered appropriate to address through this SPD which is focussed primarily on guidance concerning development in areas at risk to coastal change. The time horizons referenced in Table 1 (short [2025], medium [2026-2055], and long [2056-2105]) have been amended to up to 20, 20-50, and 50-100 years respectively. A footnote to the table has been added explaining that these	The short, medium and long term time frames in Table 1 have been amended to short term (up to 20 years), medium term (20-50 years), long term (50-100 years). A footnote to the table has been added explaining that these timeframes will be measured from the date on which the Coastal Erosion Vulnerability Assessment (CEVA) is completed.

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
				timeframes will be measured from the date on which the Coastal Erosion Vulnerability Assessment (CEVA) is completed.	
Paragraphs 4.17 - 4.18	Anglian Water Services Ltd (Tessa Saunders)	174	Temporary and time-limited development uses: 3.5. We disagree that modular housing could provide a temporary solution as such development still requires access, foundation pad/hardstanding/piling and water/sewerage infrastructure - all of which have high-levels of embodied carbon and in terms of managing our infrastructure, operational carbon too. We would question whether such temporary and time-limited uses are sustainable and suggest that focus on more sustainable and resilient locations for residential and economic development are prioritised. Given our ambition to be a net zero business and reduce our capital carbon by 70% by 2030 be providing infrastructure where there is only	While embodied carbon and the sustainable location of development are matters of significant importance, particularly in relation to climate change, they are not considered appropriate to address through this SPD which is focussed primarily on guidance concerning development in areas at risk to coastal change. Paragraph 4.22 refers to modular forms of construction, and is consistent with the approach set out in the Planning Practice Guidance (paragraph 74). For this reason, it is considered appropriate to reference modular construction in relation to temporary development.	No change
Paragraphs 4.17 - 4.18	RSPB (Ian Robinson)	93	Several energy developments and some water resource infrastructure, (including desalination plants) are likely to be proposed in the coastal zone over the coming years. It may be	Wind turbine infrastructure is identified as a type of development that can	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			helpful to reference this, along with the principle that the locations of such developments should be carefully chosen to avoid impacts on coastal processes and the natural environment.	constitute essential infrastructure in paragraph 4.5, which is consistent with the classification of essential infrastructure set out in Annex 3 of the National Planning Policy Framework (NPPF).	
Paragraphs 4.17 - 4.18	The Benacre Company (Beverley Buggs)	132	<p>The SPD does recognise at paragraph 3.12 the objectives of Local Plan and Neighbourhood Plan policies to achieve diverse and prosperous economic growth. This is welcomed. Whilst appreciating the overarching objective to avoid inappropriate development in vulnerable coastal areas, further references should be made in the SPD to the contribution that all forms of economic activity can make to the local economy. It should also recognise that developments can cumulatively have substantial economic benefits. That said, the SPD references the need to demonstrate ‘substantial economic benefits’ at paragraphs 4.18 whereas the requirement in the Waveney Local Plan area of East Suffolk is ‘economic benefits’ (Policy WLP8.25). Notwithstanding the reference to ‘substantial economic benefits’ in the PPG, the SPD cannot and must not set a higher bar in the Waveney Local Plan area of East Suffolk than is already set out in the development plan.</p> <p>The Benacre Estate comprises approximately 8000 acres of land along Suffolk’s east coast; this includes four miles of coastline.</p> <p>Part of the estate is farmed in-hand, the rest is let. There are approximately 90 residential houses, which are let, as well as</p>	While the Waveney Local Plan policy WLP8.25 (Coastal Change Management Area), and Suffolk Coastal Local Plan policy SCLP9.3 (Coastal Change Management Area) specify that commercial and community uses within the medium and long term CCMA time horizons must demonstrate that they require a coastal location and provide economic and social benefits, the Government’s Flood Risk and Coastal Change Planning Practice Guidance makes clear that such development will require substantial economic and social benefits. For this reason, paragraph 4.15 has been amended to highlight the difference between Waveney and Suffolk Coastal	Paragraphs 4.6 and 4.15 have been amended to highlight the difference between Waveney Local Plan and Suffolk Coastal Local Plan policies, and the Government’s planning practice guidance.

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>a few commercial units, a wedding venue/education centre, and woodlands. The Estate employs 18 members of staff.</p> <p>The estate also includes the Benacre National Nature Reserve.</p> <p>There are a number of agricultural buildings, some of which are listed, which are no longer economically viable for farming, and we are looking at ways of bringing these buildings back into use in other ways. It is critical that the SPD, building on policies in the development plan, enables us to do this. We are also looking into diversifying into other areas, as being on the coast we receive many visitors, especially the hamlet of Covehithe, where except for the church, all the land and buildings are owned by the Estate.</p>	<p>Local Plan policies and planning practice guidance.</p> <p>This SPD will not provide guidance relating to bringing former rural building into use. Guidance on this matter is addressed in the East Suffolk Council Historic Environment SPD (accessible here: https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/supplementary-planning-documents/). East Suffolk Council is also in the process of preparing a Rural Development SPD, which intends to address a number matters commonly encountered in rural areas, including farm diversification and the conversion of rural buildings. More information about the preparation of the Rural Development SPD is available here: https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/supplementary-planning-documents/.</p>	

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Paragraphs 4.19 - 4.23	Charsfield Parish Council (Pamela Hembra)	142	We support both the restriction on development in at risk areas and the idea of temporary development for commerce. Will the level of support for at risk businesses continue?	The SPD provides planning guidance to aid interpretation of policies in order to assist coastal communities and businesses to continue to prosper. The SPD cannot alter the planning policy approach set out in the Local Plans.	No change
Paragraphs 4.19 - 4.23	North Norfolk DC Coastal Ward (Victoria Holliday)	41	A proliferation of temporary structures such as mobile homes or caravans is not desirable from landscape, ecological and carbon footprint standpoints	As with all planning applications, there is a need to consider a wide range of material considerations, including landscape impact, ecology impact, and carbon emissions.	No change
Paragraphs 4.19 - 4.23	RSPB (Ian Robinson)	94	<p>4.20 Given the unpredictability and seasonal variations in rates of erosion, how will temporary and time-limited development be assessed?</p> <p>There is a risk that “modular structures” will hinder the opportunity to use land that has become unsuitable from a development perspective for nature conservation purposes.</p> <p>Will the fact they are easily disassembled mean their construction is more likely to be approved, without proper consideration for wildlife interests? These structures should be placed strategically to maximise the space that could be given over to nature.</p>	The main objective of the SPD is to provide overarching guidance in interpreting coastal planning policies, with a whole coast approach, using national planning policy, NPPF, and guidance, PPG, as its basis, which considers the flexibility of using modular buildings as a way of helping minimise costs, as part of a relocation.	No change

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				Managing erosion risk and transitioning to coastal change will require consideration of many options and none can be discounted with due consideration.	
Paragraph 4.24	RSPB (Ian Robinson)	95	<p>4.24 This is an important area that could deliver habitat and species benefits yet is described in a single sentence. This section should be expanded to highlight the benefits that habitat creation projects can deliver to coastal defence. There should be a suite of evidence available about the effectiveness of e.g., intertidal habitat benefits to defence against flooding. Would a case study on e.g., RSPB Wallasea Island or other such schemes be helpful?</p> <p>The RSPB supports Natural England's comment about highlighting the mechanisms used to manage rollback etc.</p>	Paragraph 4.26 has been amended to highlight the potential for open land uses to deliver benefits such as biodiversity net gain and/or habitat creation and replacement.	Paragraph 4.26 has been amended to highlight the potential for open land uses to deliver benefits such as biodiversity net gain and/or habitat creation and replacement.
Paragraphs 4.25 - 4.26	The Benacre Company (Beverley Buggs)	133	<p>We welcome the acknowledgement that changes of use can be acceptable in all areas of the CCMA at Table 1 and would reiterate the point we made in relation to paragraph 3.12 of the importance of recognising the significant contribution that these existing assets can (and need to) make to economic development in the area. We also support the recognition in paragraph 4.25 that "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)".</p> <p>The Benacre Estate comprises approximately 8000 acres of land along Suffolk's east coast; this includes four miles of</p>	<p>This SPD will not provide guidance relating to bringing former agricultural building into use. Guidance on this matter is addressed in the East Suffolk Council Historic Environment SPD (accessible here: https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/supplementary-planning-documents/). East Suffolk Council is also in the</p>	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			coastline and a number of agricultural buildings, some of which are listed, which are no longer economically viable for farming. It is important that the SPD support and we can find ways of bringing these buildings back into use in other ways. The Estate is also looking into diversifying into other areas, as being on the coast we receive many visitors, especially the hamlet of Covehithe, where except for the church, all the land and buildings are owned by the Estate.	process of preparing a Rural Development SPD, which intends to address a number matters commonly encountered in rural areas, including farm diversification and the conversion of rural buildings. More information about the preparation of the Rural Development SPD is available here: https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/supplementary-planning-documents/ .	
Paragraph 4.31	Potters Resorts (Mr Potter)	148	<p>Paragraph 4.31 takes a restrictive view of the appropriateness of the redevelopment or reconfiguration of existing sites. This is understandable and supported but it is considered that when considering larger sites and larger proposals the assessment of suitability should extend beyond consideration of whether ‘the proposal is substantially larger’ or more intense than any existing building or use of the site.</p> <p>Instead, a holistic view of the site, the proposed development, and any additional measures or forms of mitigation that could justify the expansion or reconfiguration of existing businesses should be adopted.</p>	Paragraph 4.18 regarding redevelopment or reconfiguration of existing development (non-residential) sets out the overarching approach to such development proposals. Paragraph 4.18 also refers to paragraphs 4.16-4.17 regarding proposals for the intensification of use (non-residential) and extensions (paragraphs 4.29-4.30), which also refers to mitigation measures which are a key component of	No change

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				Coastal Erosion Vulnerability Assessments (CEVA). As with all planning applications, the detailed considerations will depend on the facts of the case.	
Paragraphs 4.34 - 4.35	North Norfolk DC Coastal Ward (Victoria Holliday)	42	The coast roads are essential and must be replaced	Comment noted	No change
Paragraphs 4.36 4.45	Andy Smith (Cllr, Port Ward Felixstowe Town Council)	139	<p>Table 2 CEVA Matrix</p> <p>I have been very surprised to see, in a number of recent Planning Applications submitted by ESC for beach huts and other seafront activities in the South area, very obviously a Flood Risk Zone, that CEVA assessments were provided and indeed endorsed by CPE. That is wholly inappropriate – the clue is in the name. Conversely, of course, they should have, but did not, provide Flood Risk Assessments, as do the vast majority of all applications in this area. It is disturbing that clearly the authors thereof did not understand and provide the correct documents. An even more so that they were endorsed by CPE in those circumstances.</p> <p>This again gives us in Felixstowe little confidence that the major issues governing development in South Felixstowe are appreciated to any real degree by ESC.</p>	The comment relates to planning applications rather than the content of the SPD.	No change
Paragraphs 4.36 4.45	Anglian Water Services Ltd (Tessa Saunders)	175	3.6. Paragraph 4.40: We note the lifetime of development provided for the purposes of the Coastal Erosion Vulnerability Assessment (CEVA) is 100 years for residential and 75 years for non-residential. However, we are concerned that the focus is primarily on coastal erosion risk and not an integrated approach on the longer-term aspects of embodied carbon in	While embodied carbon and the sustainable location of development are matters of significant importance, particularly in relation to climate change, they are not	The bullet points under paragraph 4.36 have been amended to highlight the importance of considering the impacts of

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>development and its associated infrastructure. Water supply and sewerage assets are planned to serve a much longer timescale, and these are key considerations in our own plans to become a net zero company. We are working to ensure that we reduce capital carbon as much as possible in our capital investment schemes, achieving a 70% reduction against a 2010 baseline by 2030. We therefore consider that new development should be located in sustainable and resilient locations to ensure that climate change mitigation and adaptation measures can be successfully attained, to avoid embedding carbon in development and associated infrastructure, which will then need to be protected further through coastal/flood defences, or use regular resources in clearing up floods, or have to be abandoned.</p> <p>3.7. We recommend that the CEVA also considers the infrastructure requirements to service the proposed development, and the need to consider the buildings' carbon impact throughout its lifespan i.e. in terms of embodied/capital carbon</p> <p>3.8. The CCMA's represent a limited area of constraint, but we recognise that there is still a risk beyond the identified CCMA locations in relation to sea level rise and coastal inundation to low lying areas such as The Broads, where the Environment Agency's climate change allowances will be factored in as part of the Strategic Flood Risk Assessment (SFRA) evidence.</p>	<p>considered appropriate to address through this SPD which is focussed primarily on guidance concerning development in areas at risk to coastal change. It also worth noting that the SPD cannot alter planning policies set out in the adopted local plans for the partnership authorities.</p> <p>It is only right that any new or altered servicing infrastructure proposed as part of development within the CCMA must be considered through the Coastal Erosion Vulnerability Assessment (CEVA). Paragraph 4.36 has been amended to reflect this.</p>	<p>infrastructure needed to service development.</p>
Paragraphs 4.36 4.45	National Trust (Sandra Green)	118	<p>Para 4.45 - It seems that the guidance here will only apply to built development. If that is the case that should be made explicitly clear.</p>	<p>Paragraph 4.42 refers to paragraph 4.12 in relation to the definitions for the different types of development presented in Table 2 (CEVA matrix for development types). It is</p>	<p>Paragraph 4.42 has been amended to highlight the importance of engaging with the relevant local planning authority in instances where the</p>

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
				<p>therefore considered that the SPD provides clarity as to the types of development the guidance relates to.</p> <p>Paragraph 4.42 has been amended to highlight the importance of engaging with the relevant local planning authority in instances where the development proposal is not covered by Table 2.</p>	development proposal is not covered by Table 2.
Paragraphs 4.36 4.45	Norfolk County Council (Naomi C Chamberlain)	27	The LLFA would like it noted in bullet point 3 of section 4.39 of the SPD, surface water management from proposed development is necessary to prevent cliff destabilisation that could lead to the further cliff erosion. However, there is no further consideration of surface water drainage and the discharge locations of surface water that will support this approach. For example, in the LLFA's Developer Guidance a discharge hierarchy places the discharge of surface water to ground through infiltration as a national priority. However, in this scenario with the coast eroding, discharging to the ground in some circumstances may be counter productive. The LLFA recommends that further consideration of the interaction of surface water management requirements with the SPD approach needs to be undertaken to ensure our approaches are as joined up as possible.	The third bullet point under paragraph 4.36 has therefore been amended to highlight the importance of early engagement with the Lead Local Flood Authority to ensure surface water can be effectively managed without increasing risk of coastal erosion.	The third bullet point under paragraph 4.36 has been amended to highlight the importance of early engagement with the Lead Local Flood Authority to ensure surface water can be effectively managed without increasing risk of coastal erosion.
Paragraphs 4.36 4.45	North Norfolk DC Coastal Ward (Victoria Holliday)	43	A proliferation of caravan parks in the 30 m risk zone is not desirable from ecological, landscape and carbon footprint standpoints	Matters relating to ecology, landscape, and carbon emissions would be considered through the determination of planning applications.	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
Paragraphs 4.36 4.45	North Norfolk District Council (Rob Goodliffe)	71	<p>In table 4.44:</p> <p>1. NNDC - Permanent residential development suggest a Level B CEVA is appropriate, although this should be identified as Not permitted.</p> <p>2. NNDC - Extensions etc, suggests level B CEVA, this would appear overly onerous and should be level A?</p>	<p>1. Table 2 has been amended to identify permanent residential development within the CCMA (or Coastal Erosion Constraint Area) within North Norfolk District Council as not permitted. This change has been made to align with local plan policy.</p> <p>2. Consideration has been given to the appropriateness of a Level B CEVA for extensions within the CCMA, and the SPD has been amended to require extensions to be supported by a Level A CEVA rather than a Level B CEVA.</p>	<p>1. Table 2 has been amended to identify permanent residential development within the CCMA (or Coastal Erosion Constraint Area) within North Norfolk District Council as not permitted. This change has been made to align with local plan policy.</p> <p>2 For all local planning authorities the requirement for extensions to be supported by a Level B CEVA has been amended to a Level A CEVA.</p>
Paragraphs 4.36 4.45	RSPB (Ian Robinson)	96	<p>4.39 One of the few explicit references to the natural environment and the pressures facing it. RSPB would like to see the text amended to place greater emphasis and importance on and value of the natural environment</p> <p>4.44 Should this include open land use for completeness and to highlight that this change would be encouraged in all areas?</p>	<p>Paragraph 4.39 gives appropriate consideration to the importance of the natural environment in relation to development on the coast.</p> <p>Open land uses are not included within the table as they can incorporate a wide variety of risks, which cannot be easily summarised in the</p>	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
				table. It is therefore important to engage the relevant local planning authority and Coastal Partnership East when considering taking forward an open land use on the coast.	

Chapter 5 Rollback and Relocation

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
Paragraphs 5.1 - 5.6	Anne Jones	68	Why is it the case that compensation is not a matter which can be considered under planning policy? The situation where some land and property is protected by government and not others and what's more - that other communities benefit from the loss of other's land and property there must be some redress to the injured communities	This is a national policy matter and so outside the scope of the SPD.	No change
Paragraphs 5.1 - 5.6	Bourne Leisure (Lichfields)	162	Rollback, relocation and enabling development – the draft provisions are practical and helpfully consider a range of scenarios that affect how different sites and different uses could implement a rollback and relocation strategy. The flexible, case-by-case approach proposed is endorsed by Bourne Leisure, including reconfiguring existing sites and the ability to relocate to new sites if the former is not possible. Reference to phased works linked to helping “absorb the costs and potential loss of business” is helpful, as is the ability to provide enabling development to cross-subsidise and facilitate the relocation of properties including holiday accommodation, if proven to be necessary and there is a demonstrable public benefit. Paragraphs 6.13 and 6.14 are endorsed as they (i) recognise tourism accommodation and facilities as a “hugely	Support noted	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			important part of the economy” and a “vital source of employment” and (ii) allow the continued use of such sites through rollback/relocation can retain “considerable public benefit”. The reference to the possible use of enabling development to fund coastal defences to mitigate erosion risks to properties and businesses is also endorsed. Tourism operators should be allowed to protect their properties by investing in maintaining existing flood defences or providing new defences, and such initiatives should be capable of being led and funded (including by enabling development) by the private sector, as required and appropriate.		
Paragraphs 5.1 - 5.6	Cromer Town Council (Janet Warner)	32	<p>Please be advised that at a recent meeting of Cromer Town Council’s Planning Transportation & Environment Committee, members considered the above-mentioned consultation document. It was agreed to support the document but to ask whether consideration needs to be made regarding the roll back of coastal footpaths.</p> <p>Kind regards</p> <p>Janet Warner</p>	<p>Support noted</p> <p>Noted regarding footpaths. Reference to rollback of footpaths and infrastructure more generally will be included.</p>	<p>Further detail in relation to the rollback of footpaths (including the England Coast Path) and infrastructure more generally are set out in paragraphs 5.28.</p> <p>New development should not hinder future realignment of the England Coast Path and should seek to proactively provide future options for realignment of this path and other public access.</p> <p>On infrastructure, options for relocation should be considered and the rationale for the proposed scheme set out clearly,</p>

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
					taking into account operational, financial and environmental elements (amongst other potential matters)
Paragraphs 5.1 - 5.6	National Trust (Sandra Green)	119	Para 5.1 suggest amending 2nd sentence to ' <u>Coastal change</u> can have a direct effect upon the long-term sustainability of affected coastal communities, for example through the erosion <u>and loss</u> of land, to the potential effects emanating from 'blight' and a reduced desire to invest in those properties and the wider area.'	Agree. Paragraph 5.1 to be updated as suggested.	Update paragraph 5.1 (new words underlined): ' <u>Coastal change</u> can have a direct effect upon the long-term sustainability of affected coastal communities, for example through the erosion <u>and loss</u> of land, to the potential...'
Paragraphs 5.1 - 5.6	North Norfolk DC Coastal Ward (Victoria Holliday)	44	Rollback shouldn't be like for like but rather offer the opportunity to rescope and re envision.	It is considered that the SPD allows scope for this to be considered. The SPD encourages, where possible, the identification of sites which offer an improved level of sustainability than what is being replaced. The SPD also recognises that there may be circumstances where greater flexibility may be required, for example scale and form, in the replacement of properties in order to enable an improved standard of living.	No change.
Paragraphs 5.1 - 5.6	Paul Bailey	86	Chris,	CCMAs base the delineation of the erosion zone on the	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>Hope all is well.</p> <p>Just a few comments below;</p> <p>Overall the document is comprehensive albeit lengthy, to be expected considering the magnitude of the problem.</p> <p>A couple of more specific comments;</p> <ul style="list-style-type: none"> The definition of erosion; in the document is this purely horizontal? The CCMA gives a guidance figure of 30 metres distance, should there not be a vertical consideration, say 500, 1000 or 1500mm above current mean sea level? The risk from rising sea level may be proportionately less but surely there needs to be some guidance and recommendation. <p>Is the 30m guide, although a rolling figure, sufficient?</p> <ul style="list-style-type: none"> Rollback, enabling development and finance; given the extent of the problem around the UK and current financial forecasts it is difficult to see the funding coming from the public purse. The use of S106 is common place, early action is imperative to avoid a lag between potential losses and new availability. Should there be some firmer guidance of S106 before endangered real estate is on the edge? <p>Best regards</p> <p>Paul Bailey</p>	<p>three erosion zone risk area that are identified in the respective Shoreline Management Plan (or subsequent future updates).</p> <p>The 30m figure used is commonly (though not universally) prescribed within Local Plans as an appropriate distance in which development outside but within this landward distance of the CCMA need to take account of the coastal erosion in the vicinity.</p> <p>It is agreed that funding for rollback and relocation remains a challenging area but the SPD includes positive guidance to encourage proposals are made in a timely way, where possible</p>	
Paragraphs 5.1 - 5.6	RSPB (Ian Robinson)	97	5.2 If compensatory land intended for future developments can be formally earmarked in the local plans, can the same be	The Planning Practice Guidance does identify that	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>done for habitats? Can we anticipate which habitats will be lost and effectively put a “place holder” on available pockets of land away from the coast to safeguard against future losses and prevent land being snapped up for other uses that will not be sympathetic to wildlife?</p> <p>5.4 Follow on comment to our introductory paragraph, namely the ICZM needs to make links between adjacent local plan areas especially where rollback and displacement may take place.</p>	<p>allocation of land for rollback is an option; however, the planning authorities for this SPD do not currently identify allocated sites for rollback in their Local Plans. But they do enable rollback via supportive planning policies.</p> <p>It is possible to identify “rollback” land for habitats but this is not a matter that can be addressed in the SPD – it may be something that future Local Plans can consider.</p> <p>The links between and across different Local Plan areas are recognised. Cross-district planning applications are rare but are dealt with appropriately when they occur and the cross-authority nature of this SPD will only help in this regard.</p>	
Paragraphs 5.1 - 5.6	Sheringham & District Society (Chris Duxbury)	33	<p>Thank you for the information and access to the planning documents.</p> <p>We have made members of the Society aware of the consultation and how to access it.</p>	Support welcomed.	No change.

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>The Sheringham and District Society is not only concerned with Sheringham itself but area around it. The Society strongly supports the approach the coastal adaptation planning document takes, of supporting land and property owners affected by erosion or the threat of erosion through rollback and relocation and the ideas of enabling development.</p> <p>Kind regards, Chris Duxbury Secretary Sheringham & District Society</p>		
Paragraphs 5.1 - 5.6	Suffolk County Council (Georgia Teague)	172	<p>Health and Wellbeing</p> <p>The following comments consider the implications to Public Health in relation to the Draft Coastal Adaptation Supplementary Planning Document (SPD) and highlight possible health impacts on the local population. Displacement, relocation, and development will impact on people's health and wellbeing. The Introduction statement of paragraph 5.1 makes good reference to the sustainability of coastal communities, erosion of land, 'blight' and reduced desire to invest, but does not mention the health and wellbeing of those affected.</p> <p>SCC would recommend adding to the paragraph to account for this:</p> <p>"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 on the health and wellbeing and long-term sustainability of affected coastal communities, for example through the erosion of land, to the</p>	Noted. It is agreed that the additional reference to the effects on health and wellbeing be included within the SPD	Paragraph 5.1 amended to add "health and wellbeing" to the effects of coastal change on coastal communities

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			potential effects emanating from 'blight' and a reduced desire to invest in those properties and the wider area."		
Paragraphs 5.9 - 5.17	Aldringham-cum-Thorpe Parish Council (Eric Atkinson)	144	Although the government does not offer compensation (Para 5.6), is it in the first instance, the current owner of the property requiring to be relocated, that will receive the benefit afforded by the ability to build on an exception site? Can this benefit be transferred?	The original at-risk property owner does not have to live in the replacement property and there are examples where the opportunity has been transferred.	No change.
Paragraphs 5.9 - 5.17	Anglian Water Services Ltd (Tessa Saunders)	176	Residential land-uses affected by coastal erosion. 3.9. Paragraphs 5.9 - 5.14: We agree with the relocation of residential development to 'identified settlements' – whilst the term 'adjacent' is subject to policy criteria in some cases, we support the intention that the sites should be well-related in terms of accessing community services and facilities – including infrastructure connections. 3.10. Paragraph 5.17 - we support that the 'appropriateness of relocation sites' should (rather than 'may need') to also consider flood risk from all sources of flooding to ensure that these sites are sustainable and resilient.	Paragraph 5.9-5.14 – support is welcomed. Paragraph 5.17 – agree with proposed change as this is consistent with national policy and guidance.	Paragraph 5.17 (now para 5.15) amended to replace "may need" with "should".
Paragraphs 5.9 - 5.17	Anne Jones	64	If relocation policies are to be in anyway realistic and viable they must allow for replacement properties to be located in any location which is no more remote than that being replaced - to place additional requirements on the relocation makes it impossible - the sort of potential locations which are 'adjacent' to settlements or walking distance to settlements are already being given planning permission by local authorities for development so are not going to be in anyway viable for relocation of properties lost to the sea - after all these people have lost their houses and have no resources to buy land or build replacements - let alone buy land that is sold as having 'development potential'. Having spent 12 years trying to find relocation land it is clear that it is impossible to find anything which adheres to so many different, and potentially conflicting,	Existing Local Plan policies in rollback and relocation cannot be altered through the SPD. However, the SPD recognises the tension highlighted in the representation (the frequent difficulty of finding appropriate 'relocation' sites) and tries to be as positive as possible in helping facilitate this. There is always the possibility of 'material planning	No change

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			stipulations. There is no point local authorities persisting in such restrictions as it makes relocation utterly unviable. The national policy objective of allowing coastal communities to prosper and adapt can only be achieved by a more flexible approach to relocation.	considerations' weighing in favour of a particular proposal, even if it might be contrary to the relevant Local Plan policy. Future Local Plans will consider this issue again in the light of experience and the national planning policy, Defra and Environment Agency positions at that time.	
Paragraphs 5.9 - 5.17	National Trust (Sandra Green)	120	Para 5.15 to 5.17 - need to consider nature conservation as well as landscape value and heritage conservation areas.	Relevant nature conservation policies in the Local Plan will need to be adhered to anyway but some text to this effect will be included	Text added to include further detail on nature conservation (especially international and national nature conservation sites) – new para 5.35
Paragraphs 5.9 - 5.17	Norfolk County Council (Naomi C Chamberlain)	30	It is encouraging to see the SPD make reference to the visually sensitive landscapes of the coast, including the Norfolk Coast AONB. In wider terms, the changes to the coastline have an impact on landscapes, both designated as sensitive and not, of the coastline itself and the hinterland. Whilst the SPD notes risks of loss of habitats, heritage assets, infrastructure etc, more could be added to consider the impacts on vitally important green and blue infrastructure and landscape setting of some of these coastal areas, this should also consider access infrastructure such as public rights of way.	Comment noted. Some additional text will be added to the section on public access. Green/blue infrastructure covered by relevant Local Plan policies.	Text added clarifying public access and encouraging the future realignment England Coast Path and other public access paths – new paragraph 5.28
Paragraphs 5.9 - 5.17	North Norfolk DC Coastal Ward	45	Need to consider infrastructure provision when relocating eg medical centres, schools.	Relocation and rollback proposals will need to consider infrastructure	No change.

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	(Victoria Holliday)			provision, but as they are essentially people moving (rather than additional housing) there should be little additional impact on local services.	
Paragraphs 5.9 - 5.17	North Norfolk District Council (Rob Goodliffe)	72	5.16 - This could be written more clearly and needs to balance adapting to coastal change and landscape.	Comment noted. Considering the preceding paragraphs (5.15), this paragraph can be removed.	Paragraph 5.16 deleted
Paragraphs 5.9 - 5.17	Potters Resorts (Mr Potter)	149	<p>The general locational principles set out in paragraphs 5.9 – 5.17 are supported, as is the approach to commercial uses in paragraphs 5.22 – 5.30, but it is considered that the value to local communities of retaining, or protecting, employment opportunities through the relocation of existing businesses and employers should be emphasised. In particular, guidance on the relative weighting to be afforded rollback and relocation vis-à-vis protective designations, such as Areas of Outstanding Natural Beauty.</p> <p>This reflects the fact that, as noted by the draft SPD, it is desirable for many of the relocated forms of development to remain close to the communities in which they were originally situated. Many coastal areas at risk of erosion or change fall within such protective designations and guidance on how to approach decision making in such cases will help to ensure a level of consistency in outcome and provide a sense of stability for prospective ‘relocators’. This may help to encourage the sustainable relocation of businesses, where practical.</p> <p>There may be merit in affording such proposals additional weight in the planning balance beyond that which would</p>	<p>Comments noted. It is agreed that some further text emphasising the value of retaining local businesses would be of use.</p> <p>Similarly, although there is text on the AONBs in the ‘residential’ section of Chapter 5, it is agreed that appropriate references should be made to this in the ‘commercial’ section and how relocation in the AONBs could be considered (alongside the other factors).</p> <p>It is agreed that some further text clarifying how the overall elements of relocations would most appropriately be considered</p>	<p>Appropriate text added to para 5.20: “The value of retaining or protecting existing businesses and their employees (and supply chain, as relevant) to local communities can be considerable, in both economic and social terms.”</p> <p>Additional text added to para 5.24: “It is recognised, however, that the scale and type of particular businesses may necessitate further flexibility on relocation sites, with decisions being made on a case-by-case basis.”</p> <p>New para 5.25 says: “As with residential</p>

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			ordinarily by afforded were the proposal to be for a new business. This stems from the fact that businesses that are relocating are likely to be established, both reputationally and within their market sector, and consequently the benefits associated with such businesses are more concrete and less speculative than those associated with proposals for new businesses.	to provide support would be useful. There may be some benefits to retaining existing businesses over new businesses, but this can only be considered on a case-by-case basis	developments, many potential relocation sites are likely to be within one of the AONBs. Proposed relocation sites will therefore need to consider their potential landscape impacts, in line with the relevant Local Plan policies and the NPPF. It is recognised that, in some cases, the relocation site may be in a less sensitive part of the AONB than the original site, so potentially reducing the net level of harm to the AONB."
Paragraphs 5.9 - 5.17	RSPB (Ian Robinson)	98	5.12 This is probably more relevant to the local plans, but can there be a supplementary suggestion for Waveney + Suffolk Coastal here? Perhaps something to the following effect: "Developers considering rollback outside the boundaries of existing settlements should place more/equal emphasis on the environmental suitability of the prospected site compared with the ability of the site to provide a sustained level of access and facilities." 5.15 - 5.17 It would be helpful to include an explicit requirement to consider impacts on protected areas and the natural environment	This is indeed a Local Plan matter and so cannot be changed in the SPD. However, the environmental suitability of a rollback/relocation site is an important consideration – see (for example) – Policy WLP8.29 (Design) in the Waveney Local Plan.	No change.
Paragraphs 5.9 - 5.17	Suffolk County Council	180	SCC supports the preference for developments to share land boundaries with an existing settlement and the importance to	Comment noted and welcomed.	No change.

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
	(Georgia Teague)		<p>‘reduce the potential for isolated dwellings in the countryside’ as detailed within paragraph 5.10.</p> <p>SCC also support paragraph 5.14, recognising the “preference for all sites to be able to access the nearest settlements and facilities safely and where possible via non-motorised travel modes”.</p> <p>SCC would suggest including specific provisions for the needs of residents who are most vulnerable and within the short-and medium-term erosion risk areas. This could include those who are elderly, disabled, and/or living with neurodiversity: For example, the SPD could, in relation to areas or land intended for enabling sites for rollback or relocation, specify the need to ensure developments create elderly, frailty, blind/poor sight, neurodiversity and dementia-friendly neighbourhoods that consider aspects such as: wheelchair/reduced mobility accessibility and distinctive signage for neurodiversity and dementia with inclusive community design e.g.;equality of access for all disabilities including deaf and blind.</p> <p>Paragraph 5.13 refers to occupiers of the rollback accessing facilities in their new location. It is suggested that the paragraph is extended to accommodate those with additional needs:</p> <p>“In simple terms this means that in interpreting the policy, the applicant will need to clearly demonstrate that the occupiers of the rollback 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. This</p>	<p>Comment noted and welcomed.</p> <p>The comments on the need to plan appropriately particular categories of residents (elderly, disabled etc) are noted. However, there are other relevant Local Plan policies (for example, Policy WLP8.31 (Lifetime Design) in the Waveney Local Plan) and the NPPF which cover this territory and so it is outside the scope of the SPD.</p>	

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>should be inclusive to the needs of all, including those with neurodiversity, limited mobility, limited sight/blindness, parents with buggies, wheelchair users and dementia.”</p> <p>The Chief Medical Officer’s Annual Report (2021)⁴ by Prof. Chris Whitty on “Health in Coastal Communities”, highlights the fact that coastal communities have some of the worst health outcomes in England, with low life expectancy and high rates of many major diseases.</p> <p>This is certainly true of some of our communities in Suffolk around Lowestoft and Felixstowe. Our Annual Public Health Report 2022⁵ on CORE20PLUS5 in Suffolk identifies these coastal communities as facing inequalities in outcomes, access or the experience of care. There is therefore a need to recognise and meet their needs in order to reduce inequalities. Any proposals for rollback should therefore take into account the impact on health inequalities affecting coastal communities by including a Health Inequalities Impact Assessment.</p>	<p>The deprivation in some coastal communities is recognised and the councils are all working hard to try to improve this situation. However, a proposal to require Health Impact Assessments could not be required through the SPD (as this is a Local Plan matter).</p>	
Paragraphs 5.22 - 5.30	Anne Jones	66	<p>This section is entitled Commercial, community, business, infrastructure and agricultural uses affected by coastal erosion but there doesn't seem to be any consideration in the text below to agricultural uses and replacement of land and business lost to agricultural businesses - how is that to be addressed?</p>	<p>Comment noted. Some additional text will be added to cover agricultural businesses. Permitted development rights for new/replacement agricultural buildings exist and can be used, where</p>	<p>New text on agricultural land and buildings added as new para 5.31: “The loss of agricultural land to erosion is not compensated financially by the Government. However, some permitted</p>

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
				appropriate. Clearly agricultural land lost to erosion cannot easily be replaced, unless a purchase of land elsewhere is made – there is no compensation for such land lost (just as there is no compensation for any houses lost to erosion)	development rights for agricultural buildings and operations exist and these can be used, as appropriate. Where (for example) a barn used to store machinery is at high risk of being lost and it needs to be relocated/replaced elsewhere (in a location at lower risk), this would be given favourable consideration.”
Paragraphs 5.22 - 5.30	Anne Jones	69	There is no mention of the costs to damaged communities of entering into any attempts to adapt through the planning process. There is a constant requirement for planning fees, reports, consultants, professional surveys etc which are extremely prohibitive and make any attempts to 'adapt and prosper' impossible. If this document wants to address ways to help communities to adapt and prosper it needs to look at this excessive costs. It also needs to consider the excessive taxes which are imposed by the local planning authority - such as RAMs, CIL etc. CIL is based upon value of property and assumes that an area is protected by sea defences - there is no consideration given to those areas which suffer the blight of an unprotected coastline. There is also no consideration given to areas which are unprotected but have no democratic representation because they are part of a larger community which is assured of protection - this is a serious failing of our democracy and this document should consider this.	There can be requirements for various studies or evidence to support planning applications (and/or Local Plan allocations). Although some such studies may be considered expensive, these are considered necessary and appropriate. RAMS and CIL are not “taxes” on development but, in effect, necessary mitigation. CIL Charging Schedules – and the examination of them by independent examiners – assess the viability of the	No changes

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
				<p>level of charges and set these at appropriate levels.</p> <p>Questions about democratic legitimacy are not relevant to the SPD, but it is noted that in Norfolk and Suffolk every piece of land falls within the ward of at least one district councillor, the division of one county councillor, the constituency of an MP and a parish/town council (or parish meeting, where no parish council exists), so there is representation for every resident and business in that area.</p>	
Paragraphs 5.22 - 5.30	National Trust (Sandra Green)	121	<p>Para 5.22 - refer to seaside rather than seashore location?</p> <p>Para 5.26 - 100-200m away seems a very short distance but will also depend on the asset that is being considered.</p>	<p>Agreed – this will be changed.</p> <p>The distance is relatively short and it is agreed that, on reflection, greater flexibility for commercial operations is more appropriate. A distance of 2km is used by the Chartered Institute of Highways and</p>	<p>Changed reference in para 5.20 to “seaside” from “seashore”.</p> <p>Changed the distance to 2km and also added supplementary text to (now) para 5.24 to emphasise that the scale and type of business may necessitate more flexibility on relocation locations: “It is recognised, however,</p>

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>Para 5.28 - This seems to be overemphasising the importance of golf courses over other coastal assets.</p> <p>Para 5.30 - Incomplete sentence below photograph?</p>	<p>Transport as a reasonable walking distance and so this figure will be applied.</p> <p>By nature of their size and scale, it is much more difficult to relocate (partially or fully) golf courses than smaller sports facilities (such as football pitches), although the considerable difficulties (financial and/or practical) that can occur for football pitches, sports halls etc seeking relocation are fully recognised and the SPD is supportive of such appropriate relocations.</p> <p>It is not though there is any missing text – the next text below the photograph is the heading for the next section.</p>	<p>that the scale and type of particular businesses may necessitate further flexibility on relocation sites, with decisions being made on a case-by-case basis.”</p>
Paragraphs 5.22 - 5.30	North Norfolk DC Coastal Ward (Victoria Holliday)	46	Enabling Development is a worry. We don't want intensification of development in these sensitive landscapes	Enabling development cases have to be made specifically and any proposed intensification of development would be	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
				considered particularly carefully. However, enabling development can sometimes be necessary and so cannot be ruled out – specifically in the case of coastal relocations/rollbacks. All proposals would need to consider the broader policies in the Local Plan.	
Paragraphs 5.22 - 5.30	North Norfolk District Council (Rob Goodliffe)	73	5.26 - unclear as to the basis of this statement 'no more than 100-200m...'	This is a judgement as to what is considered an appropriate distance into the countryside for such developments to be relocated to away from settlements (it cannot be open season, allowing development anywhere with no regard for sustainability). However, this will be relaxed to 2km, recognising that greater flexibility for commercial operations is more appropriate (notwithstanding that each case would need to be considered on its own merits anyway). A distance of 2km is used by the Chartered Institute of Highways and Transport as a reasonable	Changed the distance to 2km and also add supplementary text to (now) para 5.24 to emphasise that the scale and type of business may necessitate more flexibility on relocation locations: “It is recognised, however, that the scale and type of particular businesses may necessitate further flexibility on relocation sites, with decisions being made on a case-by-case basis.”

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
				walking distance and so this figure will be applied.	
Paragraphs 5.31 - 5.33	National Trust (Sandra Green)	122	<p>Para 5.31 - Needs clarification that these are not simply cliff top designations, but also include the beach and nearshore zone.</p> <p>Para 5.33 - This section fundamentally misses the point about release of sediment from erosion being critical to maintaining coastal and marine habitats along the coast. It would be welcomed if the proposals suggested creating a nature rich corridor along the coastal strips, which would also allow space for habitats to move back into.</p>	<p>This is true, but it is not considered necessary to clarify as the designations and species (where relevant) cover the beach and nearshore zone – the examples given are just that.</p> <p>This is also true but not directly relevant – the core purpose of the SPD is about helping facilitating relocation/rollback.</p> <p>Although the creation of nature-rich corridors to allow the ‘rollback’ of habitats is strongly supported – and some words of support will be added – this cannot be compelled through the SPD.</p>	<p>No change</p> <p>No change</p> <p>Words encouraging the development of nature-rich corridors where any opportunities arise have been added (new para 5.35): “However, it is not, of course, possible to protect all nationally/internationally important habitats and species from the effects of coastal erosion and natural ‘rollback’ of habitats is not always possible either (due to the presence of built development, for example) – and there is no</p>

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
					<p>requirement to provide compensatory habitat in this context.</p> <p>Identifying/safeguarding any potential habitat rollback land is not within the scope of the SPD to secure/protect, but any such appropriate proposals would be strongly encouraged.</p> <p>New/expanded saltwater marshes may be one such example; inter-tidal and wetland habitats are particularly rich and important in Norfolk and Suffolk, both for biodiversity and also (to some extent) as erosion protection."</p>
Paragraphs 5.31 - 5.33	Norfolk County Council (Naomi C Chamberlain)	29	<p>It is noted that in section 2.12 (how climate change affects the coast) an increased risk to protected habitats has been identified. However, sections 5.31-33 (habitats affected by coastal erosion) appear to provide a 'light touch' commentary only as to how this significant issue can be addressed. It is recommended that a more detailed analysis and consideration be given in relation to how the threat to Internationally important habitats are addressed at a strategic, regional level.</p> <p>The approach described in section 5.33 does not appear to be adequate to address this issue; for example, the mandatory requirement for individual developments to provide a</p>	Comment noted. The creation of nature-rich corridors to allow the 'rollback' of habitats is strongly supported and some words of support will be added to the SPD, but this cannot be compelled/mandated (as this is not within the power of an SPD, which cannot	Words encouraging the development of nature-rich corridors where any opportunities arise have been added (new para 5.35): "However, it is not, of course, possible to protect all nationally/internationally important habitats and species from the effects of coastal erosion and natural

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>minimum 10% net gain in biodiversity relates to the impact of those specific developments and would not, as appears to be suggested, help deliver a meaningful replacement for those threatened Internationally important coastal habitats.</p> <p>It is advised that consideration be given to ensuring adequate land is effectively safeguarded from development and potentially allocated for the purpose of delivering replacement habitats such as reedbed and heathland, focussing particularly on land adjacent to existing wildlife sites to facilitate the inward transition of those sites.</p>	create new, or alter existing, policy)	<p>‘rollback’ of habitats is not always possible either (due to the presence of built development, for example) – and there is no requirement to provide compensatory habitat in this context.</p> <p>Identifying/safeguarding any potential habitat rollback land is not within the scope of the SPD to secure/protect, but any such appropriate proposals would be strongly encouraged.</p> <p>New/expanded saltwater marshes may be one such example; inter-tidal and wetland habitats are particularly rich and important in Norfolk and Suffolk, both for biodiversity and also (to some extent) as erosion protection.”</p>
Paragraphs 5.31 - 5.33	North Norfolk DC Coastal Ward (Victoria Holliday)	47	This is essential	Comment noted.	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
Paragraphs 5.31 - 5.33	Richard Ives	4	<p>I think this is a very important area of concern and that this part of the document needs strengthening.</p> <p>It is not just about: '...helping to provide greater public benefits to the local community' - this section should focus on wildlife and nature, which is entirely separable from community benefit - the latter is important of course, but the two should not be conflated.</p> <p>The example given, 'opportunities to introduce biodiversity net gain, such as the planting of trees, new heathland etc', should be added to, in particular, mention be made of the potential for the creation of new salt-marsh and freshwater marsh areas.</p>	<p>This is a fair point. Some changes will be made to the text to make the distinction clearer. Text will also be added to support the 'rollback' of habitats/creation of e.g. new wetlands, but this cannot be compelled through the SPD.</p>	<p>Appropriate changes to be made to para 5.35: However, it is not, of course, possible to protect all nationally/internationally important habitats and species from the effects of coastal erosion and natural 'rollback' of habitats is not always possible either (due to the presence of built development, for example) – and there is no requirement to provide compensatory habitat in this context. Identifying/safeguarding any potential habitat rollback land is not within the scope of the SPD to secure/protect, but any such appropriate proposals would be strongly encouraged. New/expanded saltwater marshes may be one such example; inter-tidal and wetland habitats are particularly rich and important in Norfolk and Suffolk, both for biodiversity and also (to</p>

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
					some extent) as erosion protection.”
Paragraphs 5.31 - 5.33	RSPB (Ian Robinson)	99	<p>5.31 - 5.33 It would be helpful to include a statement that proposals to recreate habitats lost to coastal erosion are generally encouraged (subject to other planning considerations)</p> <p>5.33 Is this lowering the standard of replacement habitat? Lost habitats should be compensated for – this would be a legal obligation should the site form part of the National Sites Network. The Environment Agency has invested in several areas to ensure habitat lost during Epoch 1 is created elsewhere to maintain the overall integrity of the National Sites Network.</p> <p>Why are intertidal and wetland habitats not mentioned? Intertidal has both flood defence and carbon storage benefits. There needs to be a more developed section describing habitats affected by coastal erosion.</p> <p>This section needs more consideration and to go beyond planting trees and recreating heathland. Care must be taken to ensure that the less ambitious parts of this plan aren’t the default position e.g., tree planting will seldom be the appropriate recompense for lost habitats with a high nature value.</p> <p>Any habitat needs to, as far as practical be like-for-like in area and type at least in broad terms (i.e., a wetland for a wetland). If freshwater habitats are lost, can the authorities work together to seek suitable replacement habitats further inland? If this isn’t ecologically feasible there needs to be an agreed</p>	<p>Comment supported – an appropriate change will be made.</p> <p>Comment noted and no, this is not intended to lower the standard or replacement (which is not within the power of the SPD to do anyway), as set out in (current) para 5.32.</p> <p>Reference to intertidal and wetland habitats will be added (they were not deliberately excluded) and this whole section will be bolstered anyway.</p>	<p>Appropriate changes have been made to new para 5.35: “However, it is not, of course, possible to protect all nationally/internationally important habitats and species from the effects of coastal erosion and natural ‘rollback’ of habitats is not always possible either (due to the presence of built development, for example) – and there is no requirement to provide compensatory habitat in this context. Identifying/safeguarding any potential habitat rollback land is not within the scope of the SPD to secure/protect, but any such appropriate proposals would be strongly encouraged. New/expanded saltwater marshes may be one such example; inter-tidal and wetland habitats are particularly rich and important in Norfolk and</p>

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>process or metric, perhaps similar in structure to the BNG metric.</p> <p>It needs to be mentioned and noted that natural habitats are important in their own rights and not just because of their ability to provide greater benefits for the local community.</p> <p>The prospect of BNG on rollback development sites is framed as beneficial to the public, rather than crucial for nature.</p>		<p>Suffolk, both for biodiversity and also (to some extent) as erosion protection.”</p>
Paragraphs 5.31 - 5.33	Suffolk County Council (Georgia Teague)	182	<p>The statements made with regard to landscape are considered broadly acceptable. However, paragraph 5.31 should indicate what measures are being put in place to mitigate habitat loss caused by coastal erosion.</p> <p>Paragraph 5.33 should be clear that any site, including rollback or relocations sites, should achieve Biodiversity Net Gain.</p>	<p>Comment noted. Some further words will be added, although for non-urban areas (where most of the designated habitats are found) there may be few/no defences. There is no requirement to compensate for loss of designated habitat land</p>	<p>New para 5.35 says: “However, it is not, of course, possible to protect all nationally/internationally important habitats and species from the effects of coastal erosion and natural ‘rollback’ of habitats is not always possible either (due to the presence of built development, for example) – and there is no requirement to provide compensatory habitat in this context. Identifying/safeguarding any potential habitat rollback land is not within the scope of the SPD to secure/protect, but any such appropriate proposals would be strongly encouraged.</p>

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					New/expanded saltwater marshes may be one such example; inter-tidal and wetland habitats are particularly rich and important in Norfolk and Suffolk, both for biodiversity and also (to some extent) as erosion protection."
Paragraphs 5.31 - 5.33	Suffolk Wildlife Trust and Norfolk Wildlife Trust (Ellen Shailes)	154	<p>This is a joint response between Suffolk Wildlife Trust and Norfolk Wildlife Trust.</p> <p>Thank you for sending us details of this consultation, we have the following comments:</p> <p>We welcome this Supplementary Planning Document (SPD) and its focus on threats to coastal communities from coastal erosion. The document highlights the increasing pressures that climate change and the resulting sea-level rise and extreme weather events will place on coastal communities, as well as protected habitats.</p> <p>We understand that the main focus of this SPD is development rollback along the East Anglian coast, where erosion is threatening housing and communities. In our response, we wish to highlight some of the ways in which this document could more effectively support potential opportunities for habitat rollback and replacement where designated sites and Priority habitats are at risk from erosion along the coast, as well as the potential for managed realignment and natural flood defence schemes in Norfolk and</p>	Support welcomed. Whilst the SPD cannot create new, or alter existing, policy, further text will be added to support habitat rollback and the benefits of it	<p>New para 5.35 says:</p> <p>"However, it is not, of course, possible to protect all nationally/internationally important habitats and species from the effects of coastal erosion and natural 'rollback' of habitats is not always possible either (due to the presence of built development, for example) – and there is no requirement to provide compensatory habitat in this context.</p> <p>Identifying/safeguarding any potential habitat rollback land is not within the scope of the SPD to secure/protect, but any such appropriate proposals would be strongly</p>

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>Suffolk to provide multiple societal, environmental, and economic benefits.</p> <p>There are significant pressures on protected habitats along our coastlines, caused by coastal squeeze, sea-level rise and storm surges resulting in the loss of habitats such as saltmarsh and coastal freshwater ecosystems such as grazing marshes and reedbed. These ongoing pressures will cause significant impacts and potential loss of specialist species, many of which are internationally rare. This Coastal Adaptation SPD could help to mitigate these risks by giving greater support for habitat rollback, managed realignment and natural flood defence schemes designed with these species in mind.</p> <p>Habitats affected by coastal erosion – Section 5.33 of the SPD states that ‘it is not always possible to replace habitat lost as a result of coastal erosion’, however there may be opportunities to create alternative habitats, such as intertidal habitat, to protect coastal defences and provide wildlife benefits. We recommend that this section be expanded to detail some of the benefits of such habitat creation schemes along the coast.</p> <p>Planned intertidal habitat creation along the coast, known as managed realignment, where existing sea defences are moved inland allowing for the creation of intertidal habitat in front of new defences, creates multiple benefits for people and wildlife. Managed realignment schemes are usually designed in order to protect coastal communities and agricultural land from the flood risks of ongoing coastal erosion and storm surges. Other benefits gained from such projects include the reduction in maintenance costs of sea defences, creation of valuable intertidal habitats such as saltmarsh, protection of</p>		<p>encouraged. New/expanded saltwater marshes may be one such example; inter-tidal and wetland habitats are particularly rich and important in Norfolk and Suffolk, both for biodiversity and also (to some extent) as erosion protection.”</p>

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			inland freshwater habitats, improved resilience to climate change, carbon sequestration, and increased ecotourism. Saltmarsh habitat has also been shown to reduce wave height and energy therefore reducing future erosion on coastal defences (The evidence behind Natural Flood Management. Environment Agency. (publishing.service.gov.uk))		
Paragraphs 5.34 - 5.40	Aldringham-cum-Thorpe Parish Council (Eric Atkinson)	145	5.40 - Does the existing site once cleared remain in private ownership and if so how can the beneficial use or appropriate adaption be enabled?	It would depend on the precise ownership situation (sometimes property may be owned leasehold, sometimes freehold). But in certain circumstances the relevant council (or perhaps other public body or quasi-public body) might agree to acquire the site/plot/house and put it to alternative use.	Sentence added to para 5.43: "Sites might be able to be transferred to the relevant local authority or parish council, but this would be dependent on private negotiations (on matters like costs and liabilities)."
Paragraphs 5.34 - 5.40	Anne Jones	65	It is totally unfair that landowners are expected to bear the cost of clearing a site - in what way does this help communities to prosper and adapt?	Requiring clearance of land where there is a potential for e.g. pollution if a house was to be lost to coastal erosion is a reasonable position for authorities to take, although it is of course acknowledged that there can be a cost associated with it.	No change
Paragraphs 5.34 - 5.40	National Trust (Sandra Green)	123	Para 5.34 - Removal of below ground structures needs to be weighed against contamination risk - all services etc. do need to be made safe even if they are not physically removed. Para 5.40 2nd sentence - it is good to see some mention of this in the document.	This is correct and some words of clarity about shutting off services will be added	New paragraph 5.37 amended: "...if structures are not considered practicable, at least they should be made safe/de-connected (or similar)."

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
Paragraphs 5.41 - 5.45	Anne Jones	67	In my 12 year experience of trying to make relocation work I can safely say that local planning authorities have not helped facilitate anything but have been very active in blocking every attempt. This document does not provide any clarity to people who have lost their property trying to relocate - there is so much complexity involved that it is impossible for someone who has lost their property to have any certainty that they can purchase a plot of land to relocate to. The local planning authority retain a long list of ifs, buts and maybes as evidenced by this document - this gives those communities which they are supposed to be helping to prosper and adapt with no way forward. The fact that local authorities have been given more funding to waste on projects does not help with the problem faced by coastal communities in general - you only need to look at the money wasted on the Pathfinder scheme to know that this doesn't help the affected communities just the ever expanding teams of bureaucrats on large salaries who do nothing to engage with or help the people in the frontline for coastal erosion.	<p>It is not true to say that LPAs are keen to block relocation proposals. Relocation proposals are inevitably complicated and it will not always be possible to agree with every suggested proposal (for a variety of reasons). CPE and councils work hard with a variety of landowners, parish councils, developers, the Environment Agency and a variety of other groups and bodies on relocation proposals.</p> <p>The SPD cannot create new, or alter existing, Local Plan policy (and obviously cannot change national policy or legislation).</p> <p>It is not accepted that the money spent on the Pathfinder scheme was "wasted". Whilst not everything turned out perfectly, this was completely as expected for an innovative initiative like this, and there were some very positive gains (such as improving cliff drainage at</p>	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
				Corton). The FCRIP and CTAP projects are very exciting multi-year projects and the findings will be of considerable benefits not just to Norfolk and Suffolk, but the whole country.	
Paragraphs 5.41 - 5.45	RSPB (Ian Robinson)	100	<p>5.41 The preferred approach should be this:</p> <p>To seek to acquire land where future development on that land will have a minimal impact on nature or the environment and which support and enable adaptation resulting from climate change.</p> <p>It would not be difficult or unreasonable to incorporate this as a common thread to the acquisition process.</p>	<p>It is accepted that some supportive words could (and will) be added, and all the Local Plans have existing policies encouraging climate change adaptation and minimising impact on nature and the environment.</p> <p>Local Plans already incorporate climate change adaptation and mitigation aims and objectives, as well as low environmental impacts, so it is not considered necessary to include them in the SPD</p>	No change

Chapter 6 'Enabling' Development

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
Paragraphs 6.2 - 6.4	North Norfolk DC Coastal Ward	48	I'm wary of this. Exception housing is fine but market development not	The use of affordable housing in paragraph 6.3 and reference to exceptions sites is an example; however,	No change

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	(Victoria Holliday)			some 'enabling' development may require some market housing to render it viable, as explained in paragraph 6.5.	
Paragraphs 6.2 - 6.4	North Norfolk DC Coastal Ward (Victoria Holliday)	49	Exception housing is fine, market development not	The use of affordable housing in this para and reference to exceptions sites was an example and is not directly linked to this SPD.	No change
Paragraphs 6.5 - 6.7	National Trust (Sandra Green)	124	Para 6.6 - We welcome reference to natural habitats but we would like to see more to encourage developers to think more widely about how projects can contribute to nature recovery and biodiversity gain.	BNG under the Environment Act is being implemented in November 2023 and April 2024 for smaller sites as a national requirement. Local Plan policies on the natural environment will still apply to this development type despite this SPD. Local Nature Recovery Strategies are also being produced.	No change
Paragraphs 6.5 - 6.7	Potters Resorts (Mr Potter)	150	The approach to enabling development outlined, particularly paragraphs 6.5 – 6.7 and 6.13 – 6.14, is welcomed but additional guidance on the weight to be afforded to enabling development would be useful in ensuring that such proposals are treated appropriately. It is notable that not all authorities have policies that expressly support this approach and so the Coastal Adaptation SPD will serve a key role in ensuring that enabling development carries appropriate weight across all authorities and helps to bridge any policy gaps through its role as a material consideration in the planning process.	Comment noted, but every case will be unique and the public benefits will need to be weighed against the disbenefits. Applicants should provide any evidence with their planning application and it will be particularly important that pre-application advice be sought.	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
Paragraph 6.8	Suffolk Wildlife Trust and Norfolk Wildlife Trust (Ellen Shailes)	155	<p>‘Enabling’ Development – The SPD provides detail on how housing rollback has been achieved along the coast in Norfolk and Suffolk and how funding mechanisms, such as enabling development, could facilitate rollback. We would welcome more detail on how this and other mechanisms could be applied to fund rollback or creation of natural habitats.</p> <p><i>Follow up:</i></p> <p>We are saying that there could be some more detail within the SPD as to how the loss of habitats along the coast due to coastal erosion, in particular priority habitats and designated sites, could be compensated for by the creation of new habitat which could be funded by enabling development. The potential of this is highlighted in Section 6.8: <i>‘The main scenarios that could involve potential enabling development most relevant to this Coastal Adaptation SPD are: Rollback or creation of natural habitats (e.g. creation/expansion of salt marsh), funded by enabling development elsewhere.’</i></p> <p>There could be a scenario where enabling development was designed to fund both housing rollback and habitat rollback, if habitat rollback could be shown to have dual public benefits to people and wildlife. We mean that habitats lost to coastal erosion could be created elsewhere, using enabling development as a funding mechanism, which I believe is what is meant in Section 6.8 of the SPD as highlighted above. We are also recommending that there should be some examples of this in the SPD, if possible, to give more detail and highlight the possibilities as to how enabling development could be used in this way. Whilst the SPD contains case studies of how enabling development has been used to fund housing rollback,</p>	Rollback of natural habitats is included in 5.331-5.36. There is, like residential and business properties, no specific funding available for rollback of natural habitats. However, a case might be able to be made for enabling development to fund the rollback/creation of natural habitats	New para 6.19: “Some coastal habitats are being lost to ‘coastal squeeze’ (where they are eroding but cannot roll back naturally, due to the presence of built development or other factors). There can obviously be public benefits to (re)creating such habitats, including potentially erosion protection (such as salt marshes), tourism (bird-watching, walking etc) and wider biodiversity benefits. If such a proposal was suggested, then the clear public benefits would need to be set out, along with a mechanism for how much enabling development was required and how the enabling funds would be spent on the habitat (re)creation, including (as appropriate) any longer-term maintenance requirements.”

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			there is not any detail of how this has been done or could be done for habitat creation or coastal defences. We understand there is a need for a public good to be demonstrated in order for enabling development to be allowed, but habitat creation could provide a range of public goods. For example, enabling development could fund salt marsh creation in areas where salt marsh has been lost due to erosion. There are a range of potential public goods from salt marsh creation including: natural coastal defences as saltmarshes have been shown to reduce wave energy and protect sea walls and other coastal defences, carbon sequestration, benefits to biodiversity leading to benefits to local people from increased access to nature and local tourism etc... I haven't been able to find an example of this, but I did find an example of how enabling development was used at Bawdsey to fund hard coastal defences and the same mechanism could be used if a community wanted to create natural coastal defences in the form of habitat creation instead of hard defences.		
Paragraph 6.8	Suffolk Wildlife Trust and Norfolk Wildlife Trust (Ellen Shailes)	155	In Section 6.8 there are some scenarios outlined of how enabling development could be used to fund housing relocation, coastal defences, and habitat creation. Whilst we are unaware of any case studies of where enabling development has been used to fund habitat creation, we would welcome the inclusion of case studies where enabling development has been used for other schemes, to provide a better understanding of the potential of this funding mechanism and how it could be applied to support habitat rollback or creation to mitigate loss of coastal habitats. One example is that of coastal defence improvements at East Lane, Bawdsey which were funded by the sale of land for development. This development was contrary to planning policy at the time but allowed due to the public benefits of continued protection of this part of the coast (Case study 5.	Whilst this case study is an interesting one and some parts of the process are pertinent to this SPD, this was some time ago. We feel the case studies we have included are more recent and therefore are more appropriate to include in the SPD.	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			East Lane Bawdsey. Coastal Schemes with Multiple Funders and Objectives. (publishing.service.gov.uk) . It is easy to see how a similar approach could be used to fund nature-based solutions (NBS) as an alternative or complementary measure to hard defences.		
Paragraphs 6.10 - 6.12	Anglian Water Services Ltd (Tessa Saunders)	177	Remediation, demolition and treatment of existing sites and their uses 3.11. Paragraph 6.12: We support the example provided for rollback in providing plots for the relocation of existing properties within residential allocations, as these sites will be assessed for their sustainability and resilience through the respective SEA/SA and Local Plan process.	Support noted.	No change
Paragraphs 6.10 - 6.12	Anne Jones	76	How does the provision of plots on a site in Reydon constitute enabling development? - the people who have benefitted from this are the landowners of that site and the developer who have received planning permission from the local authority for 220 dwellings on farmland in the AONB - this does nothing to enable the community who have lost land and property to adapt to their situation - it just enables those who have lost nothing to coastal erosion to get a bit richer.	Obviously, the scale of the allocation and permission (220 dwellings) goes beyond purely 'enabling' development but the opportunity was taken to secure seven plots as part of the Local Plan allocation process, plots which would not otherwise have been available for rollback/relocation.	No change
Paragraphs 6.10 - 6.12	North Norfolk DC Coastal Ward (Victoria Holliday)	50	See previous comments re access to and capacity of nearby infrastructure (comment ID45)	Relocation and rollback proposals will need to consider infrastructure provision, but as they are essentially people moving (rather than additional housing) there should be little additional impact on local services. Any enabling	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
				development would likely have relatively limited impact too.	
Paragraphs 6.10 - 6.12	Suffolk County Council (Georgia Teague)	181	Paragraph 6.11 highlights well the mental health impact of losing a home to erosion, which is supported. Gov UK3 has highlighted, through research on climate change, that coastal change generates anxiety and emotions around how people respond to adaptation planning.	Support noted.	No change
Paragraphs 6.13 – 6.14	Bourne Leisure (Lichfields)		Paragraphs 6.13 and 6.14 are endorsed as they (i) recognise tourism accommodation and facilities as a “hugely important part of the economy” and a “vital source of employment” and (ii) allow the continued use of such sites through rollback/relocation can retain “considerable public benefit”. The reference to the possible use of enabling development to fund coastal defences to mitigate erosion risks to properties and businesses is also endorsed. Tourism operators should be allowed to protect their properties by investing in maintaining existing flood defences or providing new defences, and such initiatives should be capable of being led and funded (including by enabling development) by the private sector, as required and appropriate.	Support noted.	No change
Paragraphs 6.13 - 6.14	North Norfolk DC Coastal Ward (Victoria Holliday)	51	Beware of being overly dependent on tourism, visitor pressure can be damaging	Noted. Any in scope development (in terms of location and type) would need to mitigate recreation impact through the Recreational Avoidance Mitigation Strategy RAMS payment – this is operation in all of Norfolk and East Suffolk.	No change
Paragraph 6.16	Anne Jones	77	This should include farming businesses - farms who have lost 100s of acres to coastal erosion should be able to seek to roll	Whilst there are sympathies with landowners who lose	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			back and relocate using enabling development to assist in land purchase - there is no logical reason why a farming business should be treated differently to any other which has lost assets to erosion	land to coastal erosion, there is a difference between them and other business owners – new land cannot be created (in other words, they would simply have to purchase existing farmland from someone else). Enabling development purely to facilitate the purchase of other land is therefore very unlikely to be appropriate.	
Paragraphs 6.17 - 6.18	Anne Jones	78	This should be made available to all coastal communities - not just some - it is highly unfair and totally unjustifiable to offer this opportunity to some coastal communities but prevent others	Opportunities will depend on the Shoreline Management Plan policy for that stretch of coast (as well as relevant Local Plan policies). Therefore, a stretch of coast for which the SMP policy is “no active intervention” would be very unlikely to be granted planning permission for a coastal protection scheme (whether requiring enabling development or not).	New para 6.21 explains this: “Any such measures/proposals would need to be in line with the relevant Shoreline Management Plan policy for that particular location, alongside relevant Local Plan policy considerations “
Paragraphs 6.17 - 6.18	RSPB (Ian Robinson)	101	6.17 It should be made clear that measures need to be in line with SMP policies and ensure that: <ul style="list-style-type: none"> a. Adverse impacts on protected sites are avoided 	It is worth reminding that all relevant policies of the relevant development plan for an area will be applied as appropriate. That being said,	New paragraphs 6.21 and 6.23 added to make these points: <p>“Any such measures/proposals would</p>

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			b. Coastal defence measures are considered holistically to ensure that flooding and erosion issues are not simply passed down the coast.	it might be useful to refer to these points.	need to be in line with the relevant Shoreline Management Plan policy for that particular location, alongside relevant Local Plan policy considerations.” And “Any such proposals would need to go through the usual planning process and consider and address such issues as impact on protected sites and any potential to make flooding and erosion worse elsewhere along the coast.”
Paragraphs 6.19 - 6.22	Anglian Water Services Ltd (Tessa Saunders)	178	3.12. Paragraph 6.21: We would contend that any permanent enabling development should reflect the longer-term aspects of embodied carbon in development and associated infrastructure, and therefore be located as far as possible within areas that are relatively unconstrained over the longer time frame (>100 years). Temporary/time-limited enabling development should also consider the embodied carbon associated with the brief period of delivering the development, the risks associated, and the infrastructure required to support it. It is questionable whether such development can be considered sustainable.	Seems that AWS are agreeing with what is written in the SPD – that we say safe for the lifetime of the development.	No change
Paragraphs 6.23 - 6.26	Anne Jones	79	More requirement for expensive reports and professional expertise which makes it further more difficult for communities to adapt - and then to insist that the council can	The LPAs need to fully understand the information behind a scheme.	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			then insist on further professional input at the expense of the victims of coastal erosion adds more barriers		
Paragraphs 6.23 - 6.26	David Beavan (East Suffolk Councillor)	24	The viability arguments must be rigorously assessed. If a landowner makes £100 an acre for agricultural rent, can he use enabling development to justify an alternative use that produces considerably more revenue - is this proportionate?	Viability assessments are always assessed appropriately, by external experts if required. There is a balance to be struck sometimes, though, and it is not always possible to insist on a scale of enabling development that is only marginally viable. It is the outcome which is key and these will typically be classic cases where a planning judgement needs to be made, balancing the 'positives' against the 'negatives'	No change
Paragraph 6.28	Anglian Water Services Ltd (Tessa Saunders)	179	3.13. Paragraph 6.28: We agree with the statement that there may be other planning reasons to refuse a scheme for enabling development and we support locations which can demonstrate their sustainability and resilience to climate change impacts. As previously highlighted, we would support Local Plans allocating sites to enable relocation sites to be tested and scrutinised through the plan-making process.	Support noted	No change
Paragraph 6.28	National Trust (Sandra Green)	125	Para 6.28 - Impacts on the natural and historic environment, as well as landscape, should also be considered.	Noted. This is covered in bullet point 3.	No change
Paragraph 6.28	RSPB (Ian Robinson)	102	6.28 Impacts may also occur to a wider suite of protected sites, and this should be avoided. It would be helpful to have all	The SPD has been amended to include consideration of impacts on national sites	Paragraph 6.33 has been amended to highlight the importance of considering

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			protected sites mentioned, rather than playing landscape designations against National Site Network and SSSIs.	network (SPAs, SACs and Ramsar sites), SSSIs, and other relevant designations.	<p>impacts of enabling development on the natural environment.</p> <p>New paragraph 5.35 clarifies this: “However, it is not possible to protect all nationally/internationally important habitats and species from the effects of coastal erosion and natural ‘rollback’ of habitats is not always possible either (due to the presence of built development, for example) – and there is no requirement to provide compensatory habitat in this context. Identifying/safeguarding any potential habitat rollback land is not within the scope of the SPD to secure/protect, but any such appropriate proposals would be strongly encouraged. New/expanded saltwater marshes may be one such example; inter-tidal and wetland habitats are particularly rich and important in Norfolk and</p>

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
					Suffolk, both for biodiversity and also (to some extent) as erosion protection.”
Paragraph 6.28	Suffolk County Council (Georgia Teague)	183	In regard to paragraph 6.28, SCC suggests that the recommendations of the Suffolk Coastal Sea Defences Potential Landscape and Visual Effects Final Report should be given more weight than just being considered to be ‘of relevance’.	Paragraph 6.33 has been amended to highlight the importance of considering impacts on the natural environment. However, as the Suffolk Coastal Sea Defences Potential Landscape and visual Effects Final Report is not clearly publicly available reference to it has been removed.	Reference to the Suffolk Coastal Sea Defences Potential Landscape and visual Effects Final Report has been removed as it is not clearly publicly available.

Appendix 1 Norfolk and Suffolk Coastal Authorities Statement of Common Ground Coastal Zone Planning (September 2018)

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
Appendix 1	North Norfolk District Council (Rob Goodliffe)	74	Signatories require updating.	The appended Statement of Common Ground is the most up to date signed document committing the signatories to collaborative integrated coastal zone management.	No change

Appendix 2 Organisation Roles and Responsibilities

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
Appendix 2	Suffolk County Council (Georgia Teague)	184	SCC notes that the Appendix 2 table, on page 48, includes Suffolk County Council, however our responsibilities are listed only as the Lead Local Flood Authority. It is requested that the other responsibilities of the County Council are listed, including as the Local Highways Authority, Education Authority, and Minerals and Waste Authority.	Comment noted	Appendix 2 amended to make reference to the responsibilities of Suffolk County Council, as well as Norfolk County Council, beyond their lead local flood authority responsibilities.
Appendix 2	Andy Smith (Cllr, Port Ward Felixstowe Town Council)	140	<p>p.47 -Glossary</p> <p>A Glossary of this type is extremely welcome to assist a wider understanding of all of the jargon around Coastal Management.</p> <p>However, in the context of my concerns around the fundamental basis of the draft SPD, it is again disturbing to see that the entry for the EA does not mention their core responsibility to provide and maintain Flood Risk Defences over large parts of the country, including of course much of the Felixstowe frontage.</p>	While the Environment Agency's strategic overview role in respect of flood and coastal erosion risk management is noted in Appendix 2, the SPD has been amended to further emphasise their functions in relation to the provision and maintenance of flood risk management structures.	Appendix 2 has been amended to further emphasise the Environment Agency's functions in relation to the provision and maintenance of flood risk management structures.
Appendix 2	Andy Smith	169	<p>p.47 -Glossary</p> <p>A Glossary of this type is extremely welcome to assist a wider understanding of all of the jargon around Coastal Management.</p> <p>However, in the context concerns around the fundamental basis of the draft SPD, it is again disturbing to see that the entry for the EA does not mention their core responsibility to provide and maintain Flood Risk Defences over large parts of the country, including of a large number of very significant assets on the Suffolk Coast and Estuaries.</p>	While the Environment Agency's strategic overview role in respect of flood and coastal erosion risk management is noted in Appendix 2, the SPD has been amended to further emphasise their functions in relation to the provision and maintenance of flood risk management structures.	Appendix 2 has been amended to further emphasise the Environment Agency's functions in relation to the provision and maintenance of flood risk management structures.

Appendix 3 Coastal Erosion Vulnerability Assessment (CEVA) Template

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
Level A CEVA	North Norfolk District Council (Rob Goodliffe)	75	Format could be improved of CEVA template.	The CEVA templates have been recreated as interactive documents which can be downloaded from the relevant local planning authority webpage.	Interactive and downloadable versions of the CEVA templates have been created and will be accessible on the relevant local planning authority's website in the event that the SPD is adopted.

Appendix 4 Case Studies

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
Appendix 4 Case Studies	Suffolk Wildlife Trust and Norfolk Wildlife Trust (Ellen Shailes)	160	<p>Appendix 4 – Case Studies –</p> <p>We would also welcome the inclusion of some managed realignment and natural flood management case studies in order to highlight the potential for multiple benefits arising from such schemes. Much of the discussion and most of the case studies used within this document relate to examples of risks to communities and housing from cliff erosion and instability, with limited consideration of communities across the region at risk from coastal flooding due to storm surges. There are many communities at risk from overtopping of flood banks and changes to coastal habitat, such as shingle banks and dune systems, which provide natural flood protection.</p> <p>There are several examples throughout Suffolk and Norfolk, although many of these have been implemented on estuarine</p>	The case studies are useful to know about but are more flood risk-related and so are not considered necessary to add.	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>systems and not on the shoreline, however many of these schemes may provide relevant learning and guidance for this SPD. Two examples of managed realignment and natural flood defences schemes are outlined below, with links to additional relevant case studies.</p> <p><u>Kessingland Levels, Suffolk – project ongoing</u> Significant coastal erosion along the Suffolk coast south of Kessingland is threatening the Benacre Pumping Station where the Hundred River meets the coast. This has resulted in a managed realignment scheme being developed, led by the water management alliance, which will result in the creation of an area of intertidal habitat and the loss of an area of freshwater grazing marsh, which is designated as the Kessingland Levels County Wildlife Site. The scheme will result in the creation of two new flood embankments, which will protect Kessingland and the Kessingland Beach Holiday Park to the north and the remaining grazing marshes, farmland and the Hundred river west to the A12. The existing coastal pumping station will be removed and two new pumping stations installed along the new flood embankments. As part of this scheme enhancement will be delivered to inland grazing marshes in order to mitigation for the loss of freshwater habitats.</p> <p>In this example, managed realignment is more favourable to the inevitable unmanaged breach in the existing sea defences and pumping station, which would have the potential to threaten south Kessingland as well as freshwater grazing marshes west to the A12. The freshwater grazing marsh is also used for local farm businesses which graze sheep and cattle, therefore this scheme addresses many</p>		

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>of the risks highlighted in Section 2.12 of the SPD, including risks protected habitats, reduction in economic activity, loss of farmland, repair and maintenance of coastal risk management measures and saline intrusion in agricultural land.</p> <p>This scheme is an example of proactive coastal adaption to protect communities, wildlife habitats and farmland and could be used as a case study highlighting the multiple benefits of managed realignment.</p> <p>There is scope for this Coastal Adaptation SPD to emphasise the potential for managed realignment and funding mechanisms to support this, particularly where coastal communities, farmland and protected habitats are at risk, such as along the Suffolk coast at Walberswick, Southwold, Aldeburgh and Bawdsey.</p> <p><u>River Glaven, Norfolk – project completed 2007</u> (Case study 2. River Glaven. Coastal Schemes with Multiple Funders and Objectives. (publishing.service.gov.uk))</p> <p>The river Glaven, along the North Norfolk coast at Cley, was at risk from being blocked by the shingle bank at Blakeney Point, which would impede the drainage of flood waters from inland marshes. This increased the risk of flooding to agricultural land, protected freshwater habitats, the A149 coast road and the villages of Cley and Wiveton. Therefore, a scheme was designed to move the river inland to allow the natural functioning of the shingle bank without risking the river Glaven becoming blocked, reducing the flood risk along the coast. The scheme also created an area of tidal saltmarsh seaward of the new river channel providing wildlife benefits and increased carbon sequestration. Other features of the</p>		

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>scheme included the improvement of sluices and the creation of a spillway to allow floodwater to quickly exit the marshes into the river Glaven. Match funding from the scheme was also used to build the Norfolk Wildlife Trust visitor centre at Cley Marshes, which provided additional societal and economic benefits from increased recreation and ecotourism to the area. Annual maintenance costs for the Environment Agency of repairing the shingle bank were also reduced by this scheme.</p> <p>This case study presents an example of a natural coastal flood defence scheme with multiple benefits for local communities, wildlife, farming businesses and local tourism. It is important to highlight the potential opportunities which can arise when schemes are designed to make use of natural flood defence mechanisms.</p> <p><u>Additional examples</u></p> <ul style="list-style-type: none"> • Levington Saltmarsh, Suffolk (Case study 56. Levington. Working with natural processes to reduce flood risk.pdf) • Waldringfield, Suffolk (Case study 58. Waldringfield. Working with natural processes to reduce flood risk.pdf) • East Lane, Bawdsey, Suffolk (Case study 5. East Lane Bawdsey. Coastal Schemes with Multiple Funders and Objectives. (publishing.service.gov.uk)) - whilst not an example of a natural flood defence scheme, this demonstrates an interesting example of how the sale of land for development was used to generate funding for a coastal defence scheme, with landowners gifting housing plots to a charitable trust. Similar mechanisms could be used to fund habitat rollback/managed realignment/natural flood defence schemes. • Fingringhoe, Essex (Case study 52. Fingringhoe. Working 		

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>with natural processes to reduce flood risk.pdf) - an example outside of Suffolk of managed realignment to reduce sea defence maintenance costs and provide wildlife benefits. Highlighted as one of the most cost-effective managed realignment schemes in the UK.</p> <p>Further case studies from across the United Kingdom can be found at: Case studies and guidance about coastal defence schemes involving local funding - GOV.UK (www.gov.uk) and Working with natural processes to reduce flood risk - GOV.UK (www.gov.uk).</p>		
Broadland Sands Holiday Park	North Norfolk DC Coastal Ward (Victoria Holliday)	52	We should use this opportunity to redesign holiday accommodation, caravan parks are not sustainable	Comment noted, but at least some caravan parks are sustainable – the vans and plots can often be moved away from the cliff edge if needed. Caravan parks also play a major role in the Norfolk and Suffolk tourism industry (see para 6.14).	No change
Beach Road Car Park & Ramp Replacement	North Norfolk DC Coastal Ward (Victoria Holliday)	53	Replacing car parks is not sustainable and should not happen. We should be discouraging car use along the coast by providing alternative methods of transport eg trains, electric buses, bicycles. The Dutch have good examples.	Comment noted. Whilst alternative methods of transport are of course encouraged, it is not considered sensible to rule out the continued use of car-parks (as much of Norfolk and Suffolk is rural and cannot be serviced by trains or buses. In any case, such a decision would be well beyond the scope of the SPD	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
Land West of Little Marl	North Norfolk DC Coastal Ward (Victoria Holliday)	54	Wouldn't a wooden lodge be better in the landscape?	This case study reports what happened with the site and the caravan was considered appropriate.	No change
Easton Lane Easton Bavents	Anne Jones	80	<p>The photograph whilst of Easton Bavents does not show the area where the 2 (and now 3 further) properties have been lost - it does however illustrate very clearly how the defences to protect others make erosion worse for those who are not deemed worthy of defence.</p> <p>There is no mention of the disastrous Pathfinder scheme which spent public funds trying to find a relocation site for 7 houses at Easton Bavents and failed - there are important learnings from this in the difficulties of finding plots for relocation and the costs of doing so. Many plots were suggested within Reydon and plans were drawn up for relocation to Risemere Lane East but local opposition prevented this. The owners were then told to get on and find their own plots - in the intervening 10 years at least 8 further plots have been suggested by owners and these have all been turned down by ESC planning.</p> <p>There was no consultation with those who lost property on the Copperwheat Avenue proposal as to whether it was a suitable, attractive or viable proposal for them.</p>	<p>It is accepted that it is not easy to find relocation sites and plots, but some sites and areas will be inappropriate for various reasons and this cannot always 'trump' the benefits of relocation/rollback.</p> <p>The Copperwheat Avenue proposal was considered (and then allocated, and subsequently permitted) through the Waveney Local Plan 2019. It is accepted that plots on that site may not necessarily be considered suitable, attractive or viable for those who have lost property to erosion, but at least it is an option for them to relocate.</p>	No change
Land West of Copperwheat Avenue	Anne Jones	81	No consultation with the community which has lost property was conducted on this proposal - surely this should be undertaken before proposing it as a solution. Not sure therefore how it can be claimed that these 7 plots are key to assisting with tackling the effects of coastal erosion in the	The Copperwheat Avenue site was consulted on publicly several times during the production of the Waveney Local Plan and was	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>local area - in what way is this the case - it allows ESC to say they have done something but if it is not done in consultation with the affected community and does not offer a viable solution then it is no more than a box ticking exercise to allow the local authority to say they've dealt with something when they have not.</p> <p>The Reydon principal residence clause should not apply to properties which are replacements - the properties they are replacing did not have that restriction - this is agreed already</p> <p>There is no mention here of the clawback clause which has been included in these plots and makes them even more unfeasible to the community which has lost property</p>	<p>independently examiner by a planning inspector, so there were plenty of opportunities for local residents to have their say on this site.</p> <p>The planning permission (Condition 37) makes clear that the Principal Residence clause <u>does</u> apply to all dwellings on the site, including the 'replacement' properties.</p>	
Land West of Copperwheat Avenue	North Norfolk DC Coastal Ward (Victoria Holliday)	55	This seems eminently sensible	Comment noted	No change
Seamarge Hotel	North Norfolk DC Coastal Ward (Victoria Holliday)	56	This seems eminently sensible	Comment noted	No change
Wood Hill Holiday Park	North Norfolk DC Coastal Ward (Victoria Holliday)	57	The relocation was to another settlement raising issues of infrastructure capacity	Comment noted, but this was considered as part of the planning application.	No change

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
Manor Caravan Park	North Norfolk DC Coastal Ward (Victoria Holliday)	58	Might have been an opportunity to replace a caravan park with alternative forms of tourism accommodation	Councils can only determine the planning applications they receive, not different schemes, and this application was linked to the Pathfinder project.	No change
Corton Pathfinder Scheme	North Norfolk DC Coastal Ward (Victoria Holliday)	59	Sounds eminently sensible	Comment noted	No change

Appendix 5 Example Conditions

No responses received

Appendix 6 Neighbourhood Plan Guidance

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
Appendix 6	National Trust (Sandra Green)	126	Add mention of identification and support for habitat creation- to final bullet point.	It is not unreasonable to mention identification and support for habitat creation.	The final bullet point of the guidance has been amended to highlight the potential for neighbourhood plans to develop a vision that identifies and supports opportunities for habitat creation, rollback and relocation.

Appendix 6	Suffolk Wildlife Trust and Norfolk Wildlife Trust (Ellen Shailes)	161	Neighbourhood Plan Guidance – Appendix 6 – Neighbourhood Plan Guidance could include the potential for Neighbourhood Plans to identify opportunities for habitat rollback and replacement, natural flood defence schemes and managed realignment including potential for these to be funded through enabling development. Another statement could be added stating that plans could ‘Allocate land for (re)development in less vulnerable locations to help fund the design and implementation of habitat rollback, natural flood defence schemes and managed realignment schemes.’	Whilst this is a laudable aspiration it could be a huge and complex task and would need a multi-agency approach. It may therefore not be practical for neighbourhood planning groups to tackle such an issue. However, provided with appropriate resources and expertise this could be addressed within neighbourhood plans.	The final bullet point of the guidance has been amended to highlight the potential for neighbourhood plans to develop a vision that identifies and supports opportunities for habitat creation, rollback and relocation.
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Appendix 7 Glossary

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
Appendix 7	Norfolk Geodiversity Partnership (Timothy Holt-Wilson)	84	The term geodiversity (used in 2.5) may be unfamiliar to readers. We suggest addition of a definition here, as follows: Geodiversity is the variety of rocks, fossils, minerals, natural processes, landforms, soils and waters which underlie and determine the character of our landscape and environment.	Geodiversity has been added to the glossary.	Geodiversity has been added to glossary.

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Strategic Environmental Assessment Screening Opinion

Coastal Adaptation Supplementary Planning Document

October 2022



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1. Introduction

In some circumstances a Supplementary Planning Document (SPD) could have significant environmental effects and may fall within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 and so require Strategic Environmental Assessment.

This screening report is designed to test whether or not the contents of the Coastal Adaptation Supplementary Planning Document requires a full Strategic Environmental Assessment (SEA). The legislative background below outlines the regulations that require the use of this screening exercise. Section 4 provides a screening assessment of the likely significant effects of the SPD and the need for a full SEA.

The Coastal Adaptation Supplementary Planning Document (SPD) is being prepared by a partnership of East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority, and the shared Coastal Partnership East team. The purpose of the SPD is to provide guidance on aligned policy approaches along the coast. The SPD follows on from the Statement of Common Ground on Coastal Zone Planning agreed between the partnership authorities in September 2018. The SPD will ensure planning guidance is up to date, aid the interpretation and delivery of planning policy, and provide case study examples of coastal adaptation best practice.

2. Legislative Background

The basis for Strategic Environmental Assessment legislation is European Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the Environment'. This document is also known as the Strategic Environmental Assessment (or SEA) Directive. European Directive 2001/42/EC was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended, including through EU Exit legislation).

The SEA Regulations include a definition of 'plans and programmes' to which the regulations apply. SEA requirements relate to plans or programmes which are subject to preparation or adoption by an authority at national, regional or local level, which includes those prepared for town and country planning and

land use. SEA is required where the plan or programme is likely to have significant environmental effects. It is therefore necessary to screen the SPD to identify whether significant environmental effects are likely. Where screening identifies significant environmental effects, a full Strategic Environmental Assessment is required.

3. Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC

The preparation of the SPD triggers a requirement to determine whether it is likely to have a significant environmental effect. This requirement is discharged by the 'responsible authority' being the authority by which or on whose behalf the plan is prepared¹. Before making a determination, the responsible authority shall: -

- a) Take into account the criteria specified in Schedule 1 to the Regulations;
and
- b) Consult the consultation bodies.

The consultation bodies are defined in section 4 of the SEA Regulations. The opinions from the statutory consultation bodies: Historic England, the Environment Agency and Natural England, are therefore to be taken into account.

Schedule 1 of the SEA Regulations sets out the criteria for determining likely significant effects as follows:

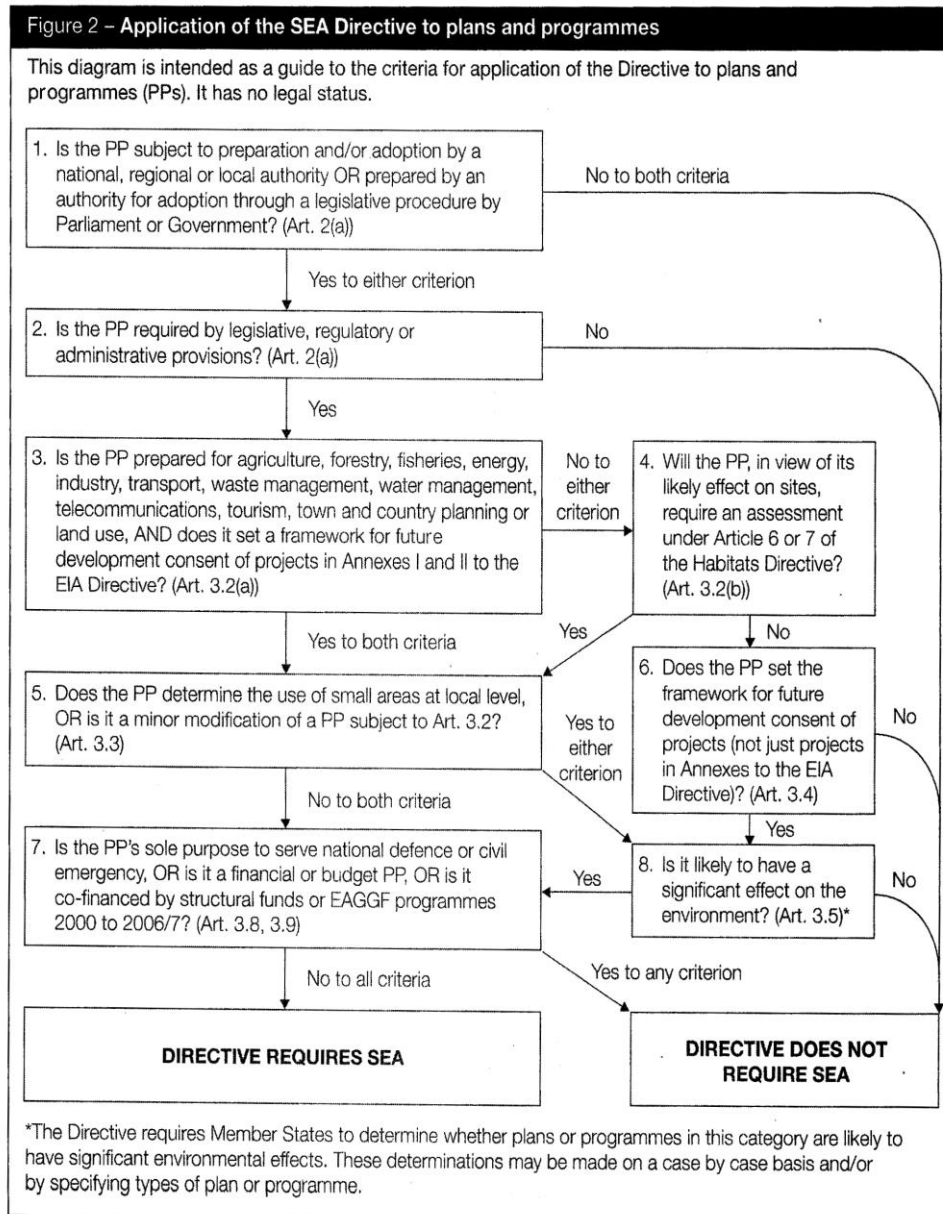
- 1. The characteristics of plans and programmes, having regards, in particular to:
 - a. The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.
 - b. The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.

¹ The responsible authorities in this case are: East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, and The Broads Authority.

- c. The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.
 - d. Environmental problems relevant to the plan or programme.
 - e. The relevance of the plan or programme for the implementation of community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:
- a. The probability, duration, frequency and reversibility of the effects.
 - b. The cumulative nature of the effects.
 - c. The trans boundary nature of the effects.
 - d. The risks to human health or the environment (e.g. due to accidents).
 - e. The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
 - f. the value and vulnerability of the area likely to be affected due to:
 - i. special natural characteristics or cultural heritage;
 - ii. exceeded environmental quality standards or limit values;
 - iii. intensive land-use; and
 - g. the effects on areas or landscapes which have a recognised national, community or international protection status.

4. Assessment

The diagram below illustrates the process for screening a planning document to ascertain whether a full SEA is required.



Source: *A Practical Guide to the Strategic Environmental Assessment Directive* (2005)

The following assessment applies the questions from the preceding diagram. The answers determine whether the SPD will require a full Strategic Environmental Assessment.

- 1. Is the PP subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))**

Yes. The preparation and adoption of the SPD is being carried out by a partnership of East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority, and the shared Coastal Partnership East team. The SPD is being produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))

Yes. Although producing the SPD is optional, the production of the SPD forms part of the delivery of the statutory Development Plan and the process for preparing SPDs is set out in the Town and Country Planning (Local Development) (England) Regulations 2012 and relates to the administration of the Council's planning service.

3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))

The SPD is prepared in support of the delivery town and country planning and land use policies.

The SPD will not set a framework for the future consent of projects listed in Annexes I and II of the EIA Directive.

4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))

A separate screening exercise has been carried out under the Habitats Directive (92/43/EEC) and Conservation of Habitats and Species Regulations (2017) (as amended). This has determined that a full Appropriate Assessment is not required.

5. Does the PP determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)

Not applicable (based on the responses to questions 3 and 4 above).

6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3(4))

Yes. The SPD will be a material consideration in the determination of planning applications and will be applied alongside the policy framework provided by the Local Plans.

7. Is the PP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)

No. Not applicable.

8. Is it likely to have a significant effect on the environment? (Art. 3(5))

No. The Coastal Adaptation Supplementary Planning Document (SPD) is being prepared by a partnership of East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority, and the shared Coastal Partnership East team. The purpose of the SPD is to provide guidance on aligned policy approaches along the coast. The SPD follows on from the Statement of Common Ground on Coastal Zone Planning agreed between the partnership authorities in September 2018. The SPD will ensure planning guidance is up to date, aid the interpretation and delivery of planning policy, and provide case study examples of coastal adaptation best practice. It is unlikely that the SPD will have a significant impact upon the environment. All policies within the relevant Local Plans have been subject to a full Sustainability Appraisal, incorporating the requirements for Strategic Environmental Assessment.

5. Conclusion

The Coastal Adaptation Supplementary Planning Document seeks to reflect and implement policies in Local Plans across the SPD partnership area (East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority) which have both been subject to Sustainability Appraisal including Strategic Environmental Assessment.

It is considered by the SPD partners (East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority, and the shared Coastal Partnership East team) that it is not necessary for a Strategic Environmental

Assessment to be undertaken of the SPD to ensure compliance with SEA legislation. This view has been supported by the statutory consultation bodies (see Appendix 1 for responses).

Signed:

Dated: 26 October 2022



Iain Withington
Planning Policy Team Leader
North Norfolk District Council

Signed:

Dated: 21 October 2022



Andrea McMillan
Planning Manager - Policy, Delivery and Specialist Services
East Suffolk Council

Signed:

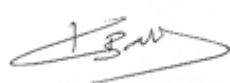
Dated: 31 October 2022



Marie-Pierre Tighe
Director of Strategic Services
The Broads Authority

Signed:

Dated: 31 October 2022



Kim Balls
Principal Strategic Planner
Great Yarmouth Borough Council

Appendix 1: Responses from Statutory Consultees

Environment Agency Response

From: Ipswich, Planning <[REDACTED]>
Sent on: Friday, September 9, 2022 1:24:08 PM
To: Laura Mundy <[REDACTED]>
Subject: FW: SEA Screening Coastal Adaptation Supplementary Planning Document

Good afternoon,

Thank you for the below consultation. As the SPD does not look to create new policy we do not disagree with the conclusion reached that further SEA reports are not required.

Kind regards,

Natalie Kermath

Historic England Response

From: Marsh, Andrew [REDACTED]
Sent on: Thursday, September 29, 2022 9:04:54 AM
To: Laura Mundy [REDACTED]
CC: EastPlanningPolicy [REDACTED] Marsh,
Andrew [REDACTED]
Subject: RE: SEA Screening Coastal Adaptation Supplementary Planning
Document

Dear Laura,

RE: SEA Screening Coastal Adaptation Supplementary Planning Document

Thank you for consulting Historic England on the draft SEA screening determination for the Coastal Adaptation Supplementary Planning Document (SPD). Having reviewed both the SPD and the draft Screening Statement I can confirm that we support the conclusion that an SEA is not required for the SPD. I would be grateful if you could confirm receipt of this email.

Best wishes,

Andrew Marsh BSc MA MRTPI
Historic Environment Planning Adviser
Development Advice | East of England
Historic England
Mobile: [REDACTED]

Direct line: [REDACTED]

Historic England

Brooklands | 24 Brooklands Avenue | Cambridge | CB2 8BU

www.historicengland.org.uk

Natural England Response

Date: 14 October 2022
Our ref: 405837



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

BY EMAIL ONLY

Dear Laura Mundy

Natural England's response to the consultation on the draft strategic environmental assessment for the coastal adaptation supplementary planning document

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Thank you for the opportunity to comment on the draft strategic environmental assessment and Habitat Regulations Assessment that relate to the coastal adaptation supplementary planning document.

Summary of response:

- Natural England looked for consistency of language between coastal adaptation supplementary planning document (SPD), the Shoreline Management Plan (SMP) and the Local Plans so that policies can be interpreted clearly and implemented correctly by planners and relevant stakeholders
- We recognise that there is generally a consistency of language between the SPD and the relevant planning policies they relate to (i.e. Local and Neighbourhood Plans)
- The SPD does a good job of explaining the hierarchy of embedded policy details clearly (e.g. Coastal Management Areas are identified in Local Plans which are derived from SMPs)
- We concur with the conclusions of the documents presented to us that the coastal adaptation SPD does not require an EIA
- We also concur with the conclusions of the Habitat Regulations Assessment (HRA) on the coastal adaptation SPD that it will not lead to likely significant effects on protected European sites

Natural England is pleased with the approach and cooperation between the planning authorities across the Norfolk and Suffolk coastline to establish this joined up strategic approach and welcome the delivery of this work, which seeks to establish a consistent interpretation of policies related to coastal change and adaptation along the Norfolk and Suffolk coastline.

We understand that the aim of the SPD is to provide guidance on the correct interpretation of planning policy and aid the implementation of relevant policies and it cannot create new or amend existing planning policies nor can it prescribe that particular areas of land be developed for particular uses. On this basis Natural England does not wish to offer substantive comments on the SPD as this is the role of Development Plans of each Local Authority. However, please see below some very brief comments on the SPD.

Comments

Section 4.29 SPD: *"Open Land Uses Open land uses are likely to be appropriate within the CCMA and indeed may be encouraged as part of the implementation of 'roll-back' proposals and could include Biodiversity Net Gain".* What leavers and/or mechanisms will be used to encourage the implementation of roll-back in this context? A reference to local plan policies would be useful here if available.

Section 4.45 (Table 2): It would be easier to interpret the table if the explanations of Level A and B CEVA" (section 4.47) came before the table.

Section 5.7 and 5.8 SPD: In the "Identifying alternative sites or land" and "Identifying appropriate site sizes" sections of the SPD, there is no reference to European Designated sites in the guidance around identification of alternative and appropriate sites. Natural England would like to point out that any alternative sites should seek to avoid likely significant effects if on or near European Designated sites and not undermine the sites conservation objectives.

General comments - Coastal SPD HRA: Document refers to both Supplementary Planning document and SPD interchangeably. Once the SPD acronym has been introduced, it is more concise to use the abbreviated SPD.

Draft Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment screening opinions

Natural England are satisfied with the conclusions of the SEA and HRA Screening Documents; it is not necessary for a SEA to be undertaken in relation to the SPD and we agree with the conclusion of the HRA Screening Statement. Implementation of the SPD will not lead to likely significant effects on protected European sites and therefore no further assessment is necessary

Should the proposal change, please consult us again.

If you have any queries relating to the advice in this letter please contact me [REDACTED]
[REDACTED]

Yours sincerely

Daniel Turner
Norfolk and Suffolk Team

Habitats Regulations Assessment Screening Statement

Coastal Adaptation Supplementary Planning Document

October 2022



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1. Introduction

1.1 The Conservation of Habitats and Species Regulations (2017) (as amended) provide protection for sites that are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species. The network consists of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both types can also be referred to as European Sites. The National Planning Policy Framework (NPPF) states that Ramsar sites should be afforded the same level of protection and refers to SACs, SPAs and Ramsar sites as 'Habitat Sites'.

1.2 The requirement to undertake Habitats Regulation Assessment (HRA) of plans and projects is set out in the Conservation of Habitats and Species Regulations (2017) (as amended).

1.3 Regulation 105 of the Conservation of Habitats and Species Regulations (2017) states:

'Where a land use plan:

(a) Is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and

(b) Is not directly connected with or necessary to the management of the site,
The plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.'

1.4 The HRA is therefore undertaken in stages and should conclude whether or not a proposal or policy would adversely affect the integrity of any sites.

Stage 1: Determining whether a plan is likely to have a significant effect on a European site. This needs to take account of the likely impacts in combination with other relevant plans and projects. This assessment should be made using the precautionary

principle. The screening assessment must reflect the outcomes of the 2018 judgement of the Court of Justice of the European Union¹, which has ruled that where mitigation is necessary this must be identified through an Appropriate Assessment.

Stage 2: Carrying out Appropriate Assessment and ascertaining the effect on site integrity. The effects of the plan on the conservation objectives of sites should be assessed, to ascertain whether the plan has an adverse effect on the integrity of a European site.

Stage 3: Identifying mitigation measures and alternative solutions. The aim of this stage is to find ways of avoiding or significantly reducing adverse impacts, so that site integrity is no longer at risk. If there are still likely to be negative impacts, the option should be dropped, unless exceptionally it can be justified by imperative reasons of overriding public interest.

- 1.5 The Coastal Adaptation Supplementary Planning Document (SPD) is being prepared by a partnership of East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority, and the shared Coastal Partnership East team. The purpose of the SPD is to provide guidance on aligned policy approaches along the coast. The SPD follows on from the Statement of Common Ground on Coastal Zone Planning agreed between the partnership authorities in September 2018. The SPD will ensure planning guidance is up to date, aid the interpretation and delivery of planning policy, and provide case study examples of coastal adaptation best practice. This report considers whether there are likely to be significant effects on protected Habitat sites as the result of the guidance in the SPD. The geographical extent of the SPD partnership area is illustrated by figure 1 below:

¹ C-323/17 – People over Wind, Peter Sweetman v Coillte Teoranta

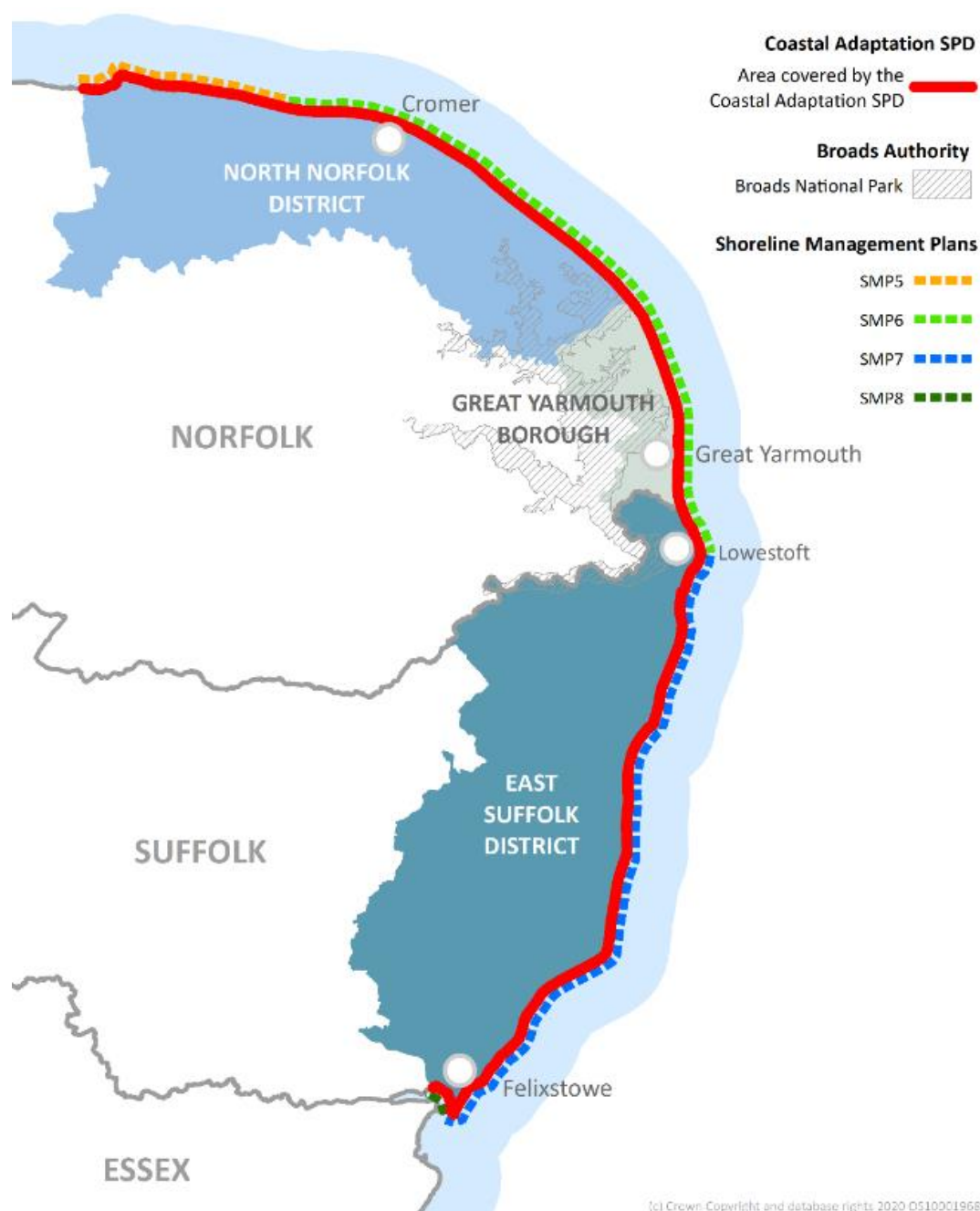


Figure 1: Extent of Coastal Adaptation Partnership Area

1.6 Within the partnership area there are a number of Local Plans, which are summarised below:

- East Suffolk (outside of the Broads) is covered by two Local Plans, the East Suffolk Council - Suffolk Coastal Local Plan adopted September 2020 and the Waveney Local Plan adopted March 2019.
- The Local Plan for Great Yarmouth (outside of the Broads) is made up of two parts, the Core Strategy (Local Plan Part 1) adopted December 2015, and the

Local Plan Part 2 adopted December 2021. The Borough Council is currently progressing a review of the Local Plan. The new Local Plan will eventually replace the Core Strategy and the Local Plan Part 2. It is intended the new Local Plan will be a single document, rather than being separate Local Plans covering strategy, allocation and detailed policies. The first stage in the review process was a 'call for sites' and consultation on a new Sustainability Appraisal Scoping Report which was held between 27 May 2022 and 08 July 2022.

- The Local Plan for North Norfolk (outside of the Broads) comprises the Core Strategy and Development Management Policies adopted September 2008, and the Site Allocations Development Plan Document adopted February 2011. The District Council is currently at an advanced stage in the production of a new Local Plan and consultation on a Proposed Submission Version (Regulation 19 Publication Stage) was held during January and February 2022.
- The Broads Authority adopted the Local Plan for the Broads on 17 May 2019. The Broads Authority have recently commenced a review the Local Plan for the Broads. The first stage in the review process was a consultation on a new Sustainability Appraisal Scoping Report which was published for technical consultation in June 2021. Issues and Options consultation commenced in October 2022.

2. Protected sites covered by this report

- 2.1 Sites included in this assessment are listed in Table 1. This includes all sites that are within 20km of the SPD Partnership Area. The locations of the sites are shown on maps in Appendix 2 and the Qualifying Features and Conservation Objectives of the sites are contained in Appendix 3.

Table 1: Relevant Habitat sites

Name
Alde-Ore and Butley Estuaries SAC,
Alde-Ore Estuary SPA, Ramsar
Benacre to Easton Bavents SPA
Benacre to Easton Bavents Lagoons SAC
Breckland SAC, SPA
Breydon Water SPA, Ramsar
Broadland SPA, Ramsar
Deben Estuary SPA, Ramsar
Dew's Ponds SAC
Great Yarmouth North Denes SPA
Greater Wash SPA
Haisborough, Hammond and Winterton SAC
Inner Dowsing, Race Bank and North Ridge SAC
Minsmere to Walberswick Heaths & Marshes SAC
Minsmere – Walberswick SPA, Ramsar
Norfolk Valley Fens SAC
North Norfolk Coast SAC, SPA, Ramsar
Outer Thames Estuary SPA
Orfordness – Shingle Street SAC
Overstrand Cliffs SAC
River Wensum SAC
Roydon Common and Dersingham Bog SAC, Ramsar
Sandlings SPA
Southern North Sea SAC
Staverton Park and The Thicks, Wantisden SAC

Stour and Orwell Estuaries SPA, Ramsar
The Broads SAC
The Paston Great Barn SAC
The Wash and North Norfolk Coast SAC
The Wash SPA, Ramsar
Winterton-Horsey Dunes SAC

3. Coastal Adaptation Supplementary Planning Document

- 3.1 This HRA report reviewed an early draft of the Coastal Adaptation SPD, dated August 2022 which was produced prior to the finalisation of the consultation draft.
- 3.2 The overall purpose of the SPD is to provide guidance on how to interpret and implement planning policy in relation to coastal matters. The guidance contained in the SPD will assist in the implementation of Local Plan and Neighbourhood Plan policies for the authorities that make up the SPD partnership area (East Suffolk, Great Yarmouth, North Norfolk and The Broads Authority Area). The SPD, when adopted, will be a material consideration in determination of applications for planning permission.
- 3.3 Chapter 1, 2 and 3 of the SPD set out the introduction, the purpose of the SPD, the policy context and an explanation the roles and remits of different organisations involved in coastal matters throughout the SPD partnership area. These chapters are descriptive statements of fact and have therefore not been included in the screening table in section 5 of this report.
- 3.4 The other chapters provide guidance on specific coastal matters to support the interpretation and implementation of planning policies. They cover:
- Development in the Coastal Change Management Area;
 - Rollback and Relocation, and
 - Delivery and Enabling Development.
- These chapters have all been included in the screening table in section 5 along with a brief summary of each chapter.
- 3.5 The SPD also includes 3 appendices. These provide additional detail to support the main body of the SPD but do not in themselves introduce any new requirements and have therefore not been included in the screening table in section 5 of this report.

4. Other Plans and Projects

- 4.1 Regulation 105 of the Habitats Regulations requires consideration to be given to whether a Plan will have an effect either alone or in combination with other plans or projects.
- 4.2 As noted in the introduction, the other key plans are the Local Plans. The Local Plans set out the broad scale and distribution of development across the four authorities which make up the SPD Partnership Area.
- 4.3 Specifically, the SPD adds detail to the following policies contained within the Local Plans:
- East Suffolk Council- policies SCLP9.3 (Coastal Change Management Area) and SCLP9.4 (Coastal Change Rollback or Relocation) of the Suffolk Coastal Local Plan and policies WLP8.25 (Coastal Change Management Area), WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion) of the Waveney Local Plan.
 - Great Yarmouth Borough Council- Local Plan Part 1 policy CS13 (Protecting Areas at Risk of Flooding or Coastal Change), Local Plan Part 2 policy GSP4 (New Development in Coastal Change Management Areas), Local Plan Part 2 policy E2 (Relocation from Coastal Change Management Areas).
 - North Norfolk District Council- Core Strategy policy EN11 (Coastal Erosion), policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk), emerging Local Plan policy CC5 (Coastal Change Management), and emerging Local Plan policy CC6 (Coastal Change Adaptation).
 - The Broads Authority- Broads Local Plan policy SSCOAST (The Coast).
- 4.4 Screening has been carried out on all the relevant local plans across the partnership area and concluded whether significant effects were likely and if Appropriate Assessment was therefore needed. Where screening identified a likely significant effect, Appropriate Assessment was undertaken and the mitigation measures identified were incorporated within the Plans, resulting in conclusions that the plans will not lead to any adverse effects on Habitat sites.

4.5 Recreational Disturbance from new residential development has been identified as a significant effect across the SPD partnership area. As a result of which, two strategic mitigation schemes have been developed and implemented, and the relevant Councils require payment towards mitigation within the relevant Zone of Influence:

- Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils (May 2019) (this also applies to part of the Broads Authority area)
- Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy (March 2021).

5. Assessment of likely significant effects of the Draft Coastal Adaptation Supplementary Planning Document (SPD) on Habitat sites

- 5.1 Table 3 below considers each relevant section of the SPD in relation to whether there is potential for a likely significant effect on protected Habitat sites. This constitutes Stage 1 as set out under paragraph 1.4 above. Consideration is given to the characteristics and location of the protected sites. The relevant sections are considered within the context of the Local Plan policies from which they hang and which have themselves been subject to Habitats Regulations Assessment, as set out in section 4 above.

Table 3: Likely significant effects of the Draft Coastal Adaptation Supplementary Planning Document

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
Chapter 4: Development in the Coastal Change Management Area	<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: East Suffolk Council: SCLP9.3 Coastal Change Management Area and WLP8.25 Coastal Change Management Areas. Great Yarmouth Borough Council: GSP4 New Development in Coastal Change Management Areas. North Norfolk District Council: EN11 Coastal Erosion. The Broads Authority: SSCOAST The Coast</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 CCMA's and that new non-residential development that is not associated with an existing building or use, is unlikely to be appropriate within the CCMA, whatever its proposed use.</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 CCMA's; it does not, in itself promote additional development. This chapter will therefore not lead to likely significant effects on Habitat Sites alone or in combination with other plans or projects.</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 CCMA's and links to the relevant guidance in the NPPF and NPPG. This chapter also provides an explanation on what is meant by 'rollback' and 'relocation' and explains that compensation is not included as part of this and	None	None	No

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	<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

A handwritten signature in black ink, appearing to read 'I. Withington', with a long horizontal stroke extending to the right.

Iain Withington
Planning Policy Team Leader
North Norfolk District Council

Signed:



Dated: 21 October 2022

Andrea McMillan
Planning Manager - Policy, Delivery and Specialist Services
East Suffolk Council

Signed:

Dated: 31 October 2022



Marie-Pierre Tighe
Director of Strategic Services
The Broads Authority

Signed:

Dated: 31 October 2022



Kim Balls
Principal Strategic Planner
Great Yarmouth Borough Council

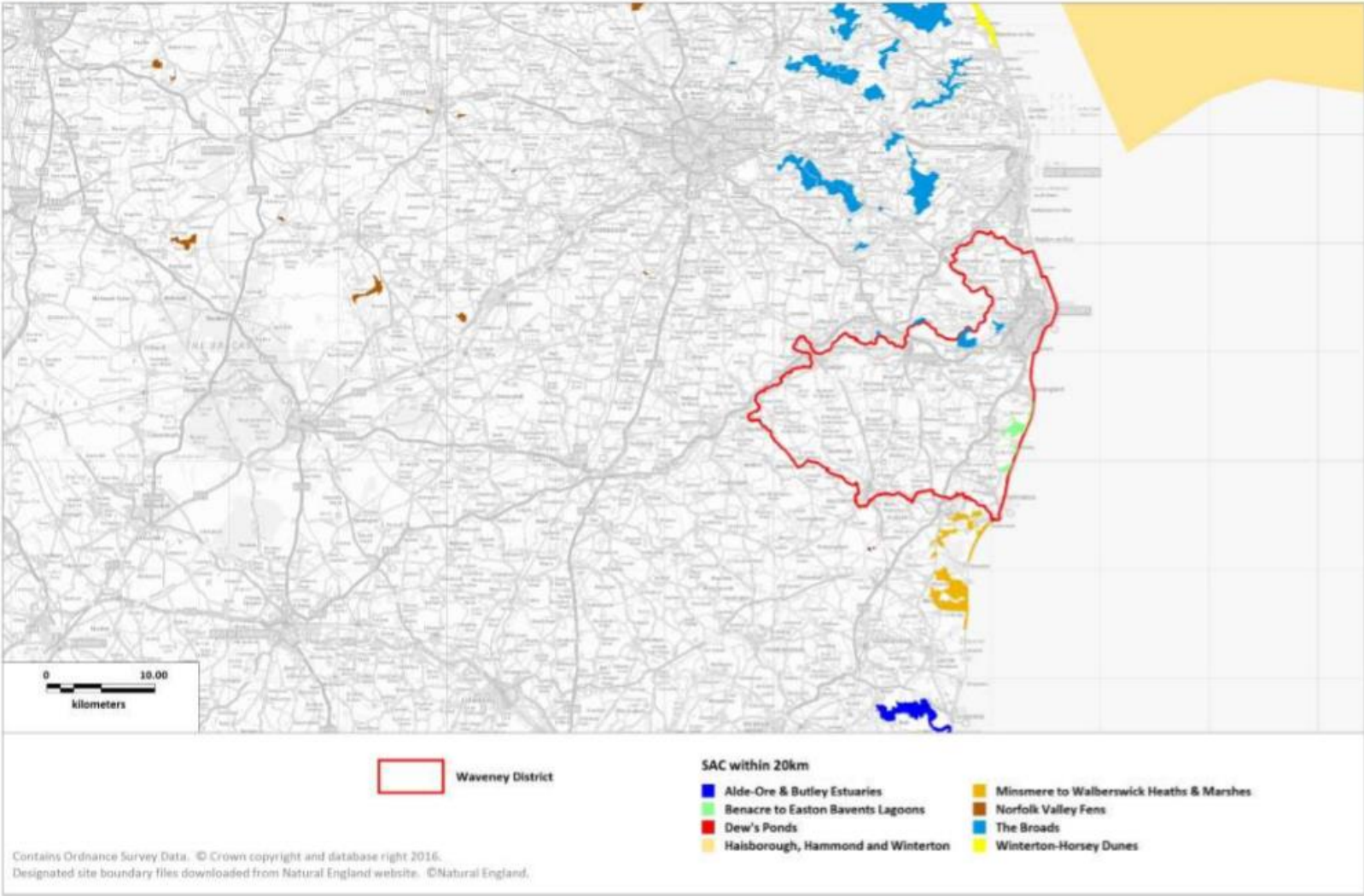
Appendix 1: Sources of background information

- East Suffolk Council – Suffolk Coastal Local Plan (September 2020)
- East Suffolk Council – Waveney Local Plan (March 2019)
- Habitats Regulations Assessment for the Suffolk Coastal Local Plan at Final Draft Plan stage (incorporating Main Modifications) (May 2020)
- The Habitats Regulations Assessment of the Waveney Local Plan (December 2018)
- Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils (May 2019)
- Great Yarmouth Core Strategy (Local Plan Part 1) (December 2015)
- Great Yarmouth Local Plan Part 2 (December 2021)
- Habitats Regulation Assessment of the Great Yarmouth Local Plan Core Strategy (February 2015)
- Habitats Regulations Assessment of the Great Yarmouth Local Plan Part 2 (December 2019)
- Habitats Regulations Assessment of the Great Yarmouth Local Plan Part 2: Addendum at Main Modifications (June 2021)
- North Norfolk Core Strategy Appropriate Assessment (June 2007)
- North Norfolk Local Plan HRA Submission Version (December 2021)
- Local Plan for the Broads Plan 2015 - 2036 (May 2019)
- Habitats Regulations Assessment of the Local Plan for the Broads (January 2019)
- Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy (March 2021)

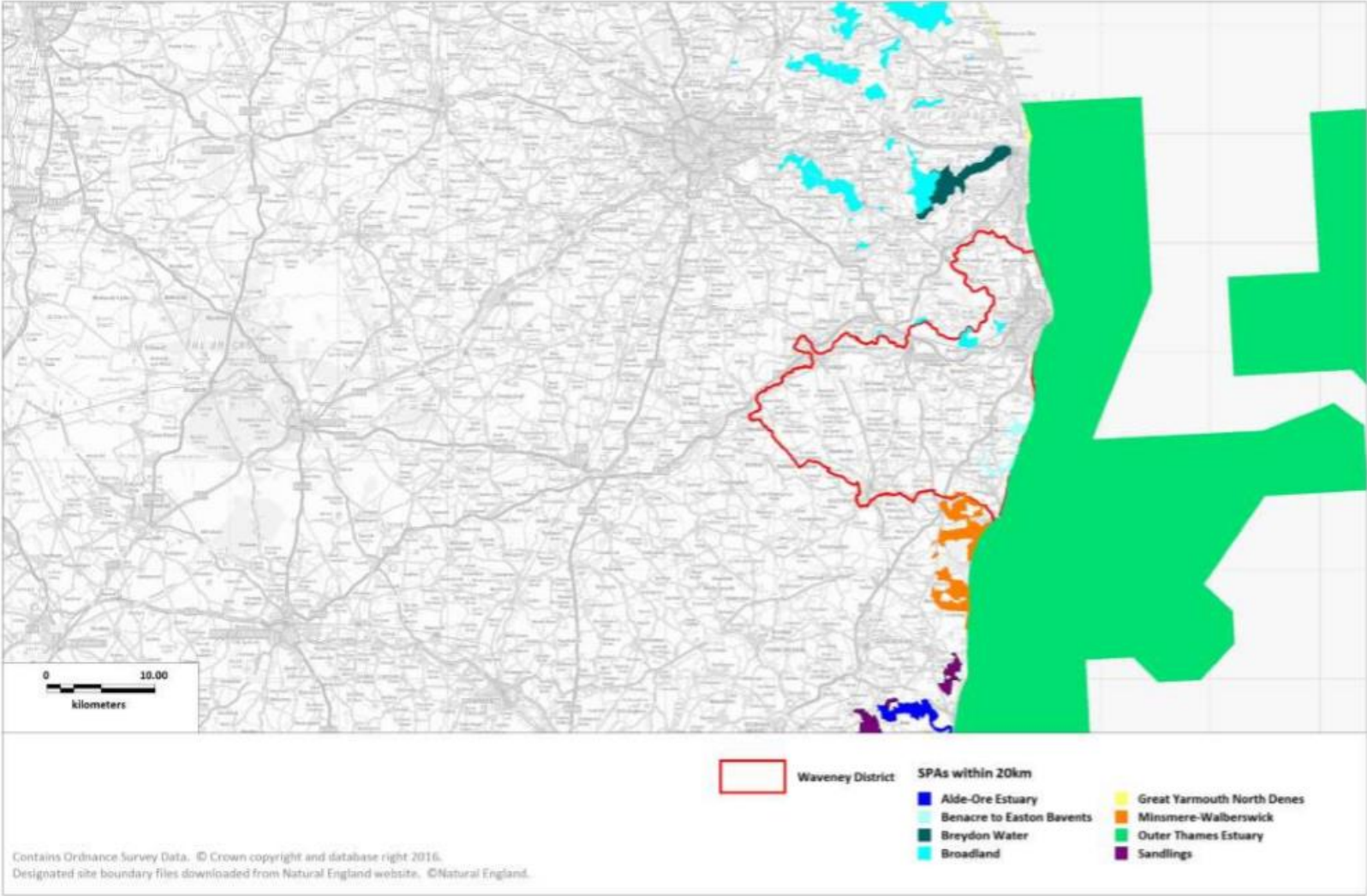
Appendix 2: Locations of Habitat sites

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

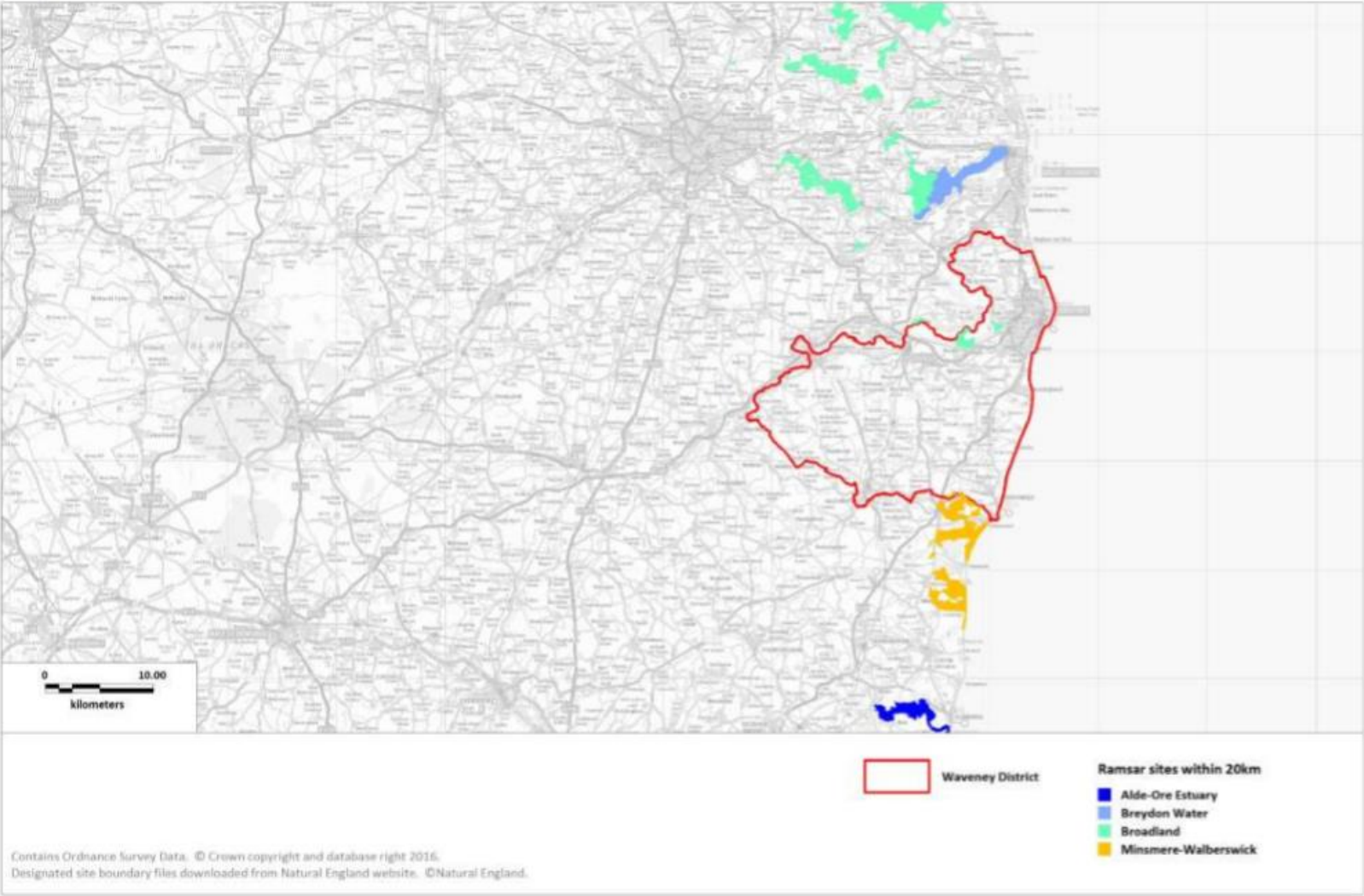
Map 1: SACs



Map 2: SPAs

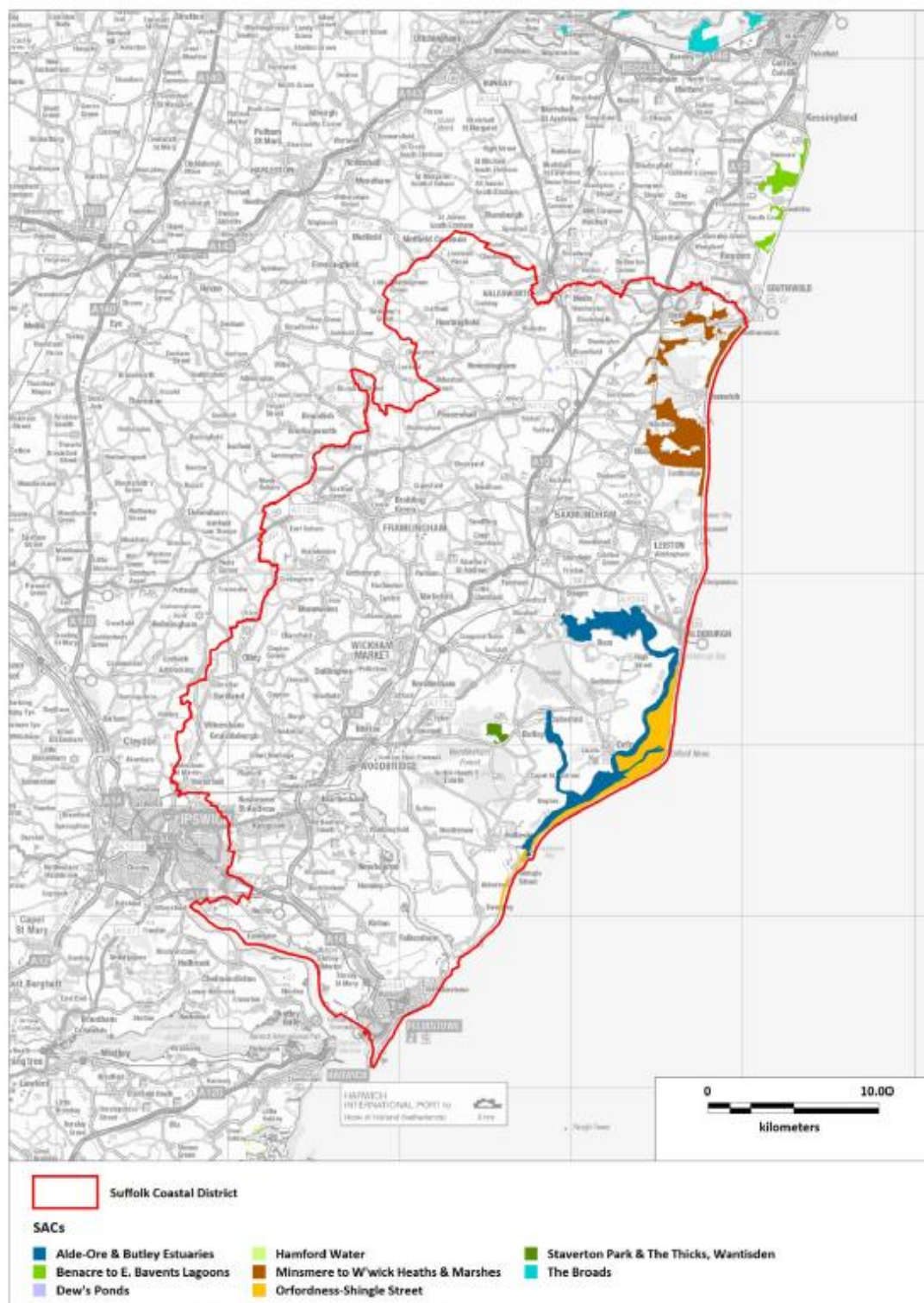


Map 3: Ramsar Sites



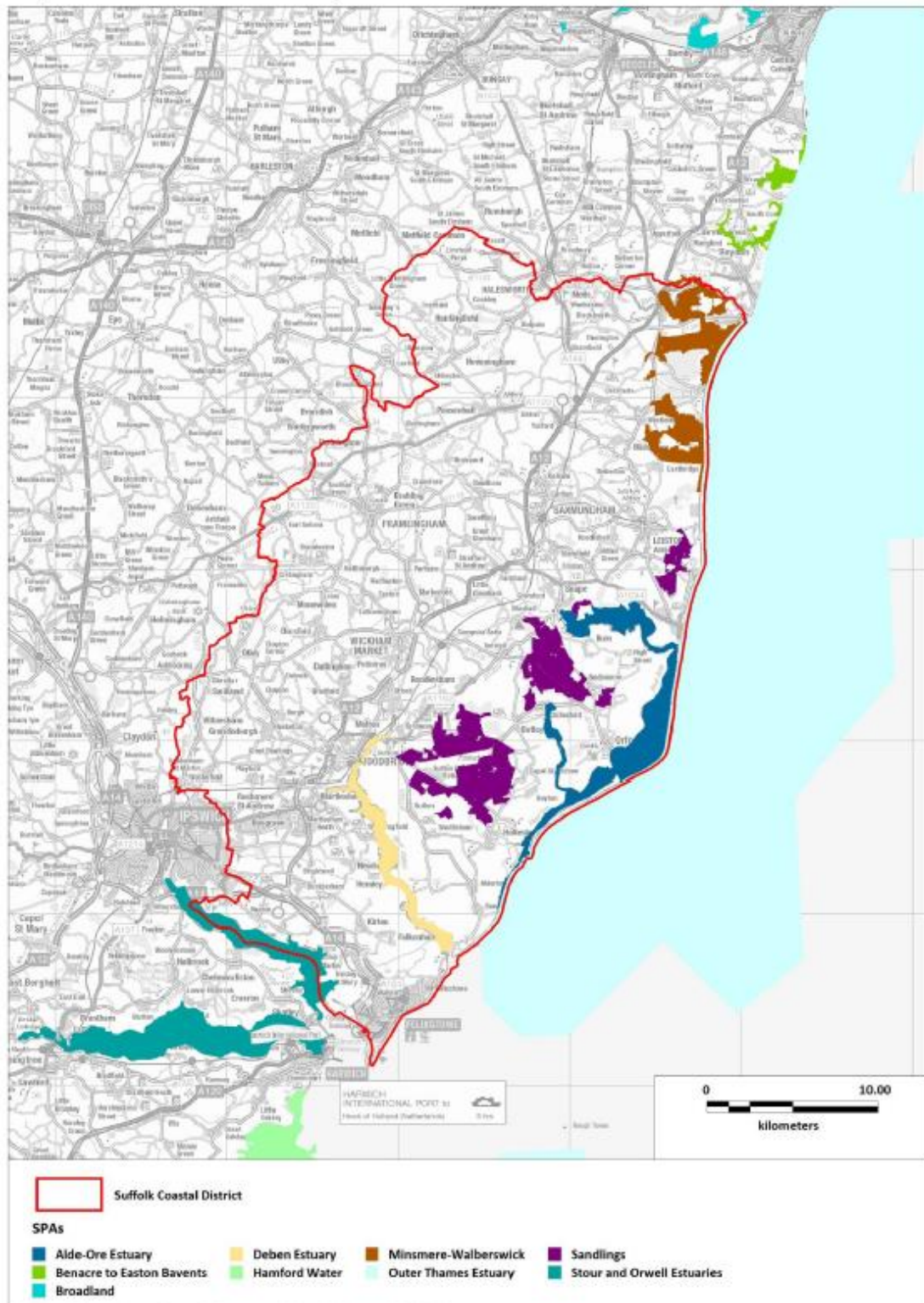
Habitat sites within 20km of the East Suffolk Council- Suffolk Coastal Local Plan Area

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

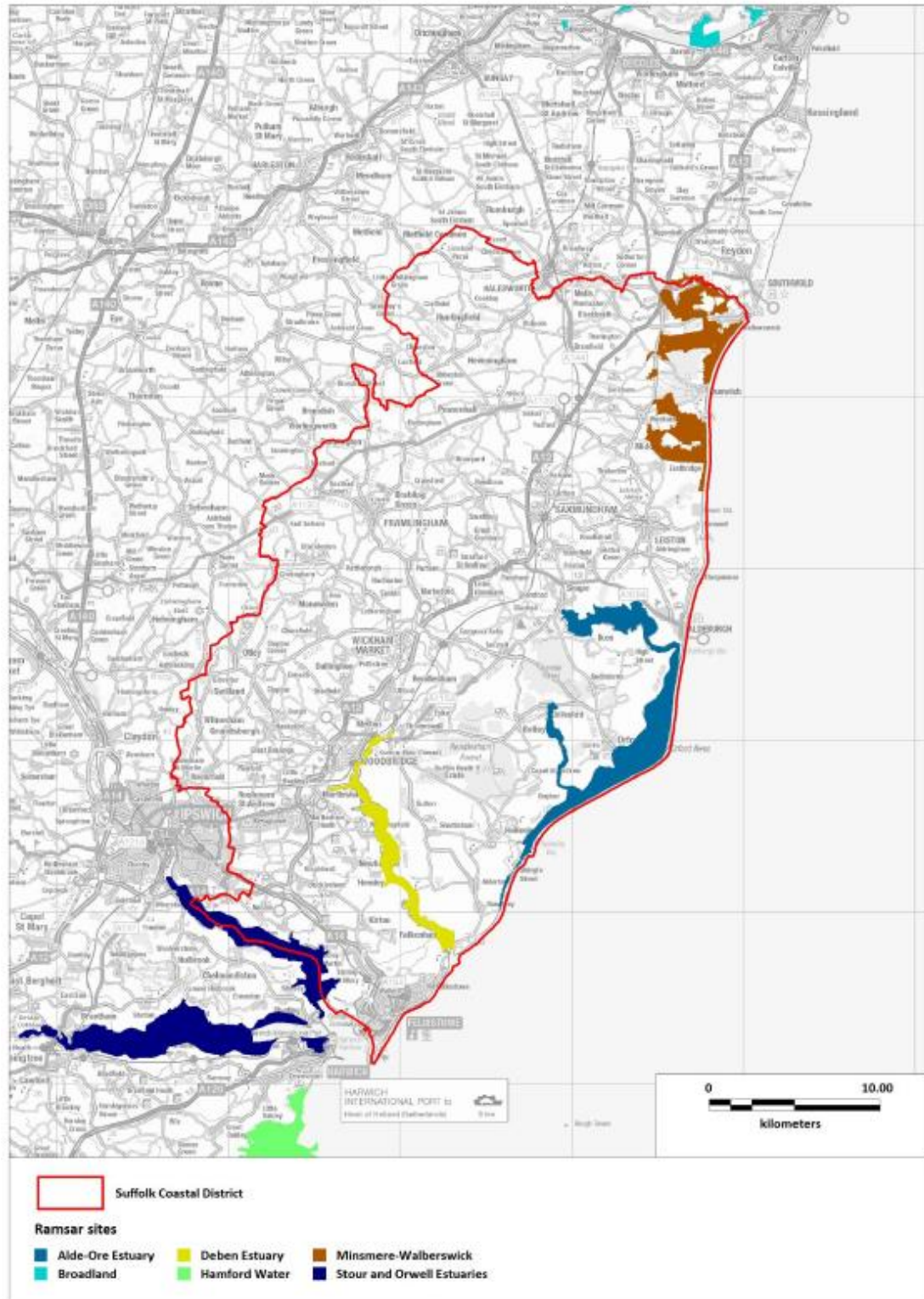


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Map 2: SPA sites where boundary within 20km of Suffolk Coastal District

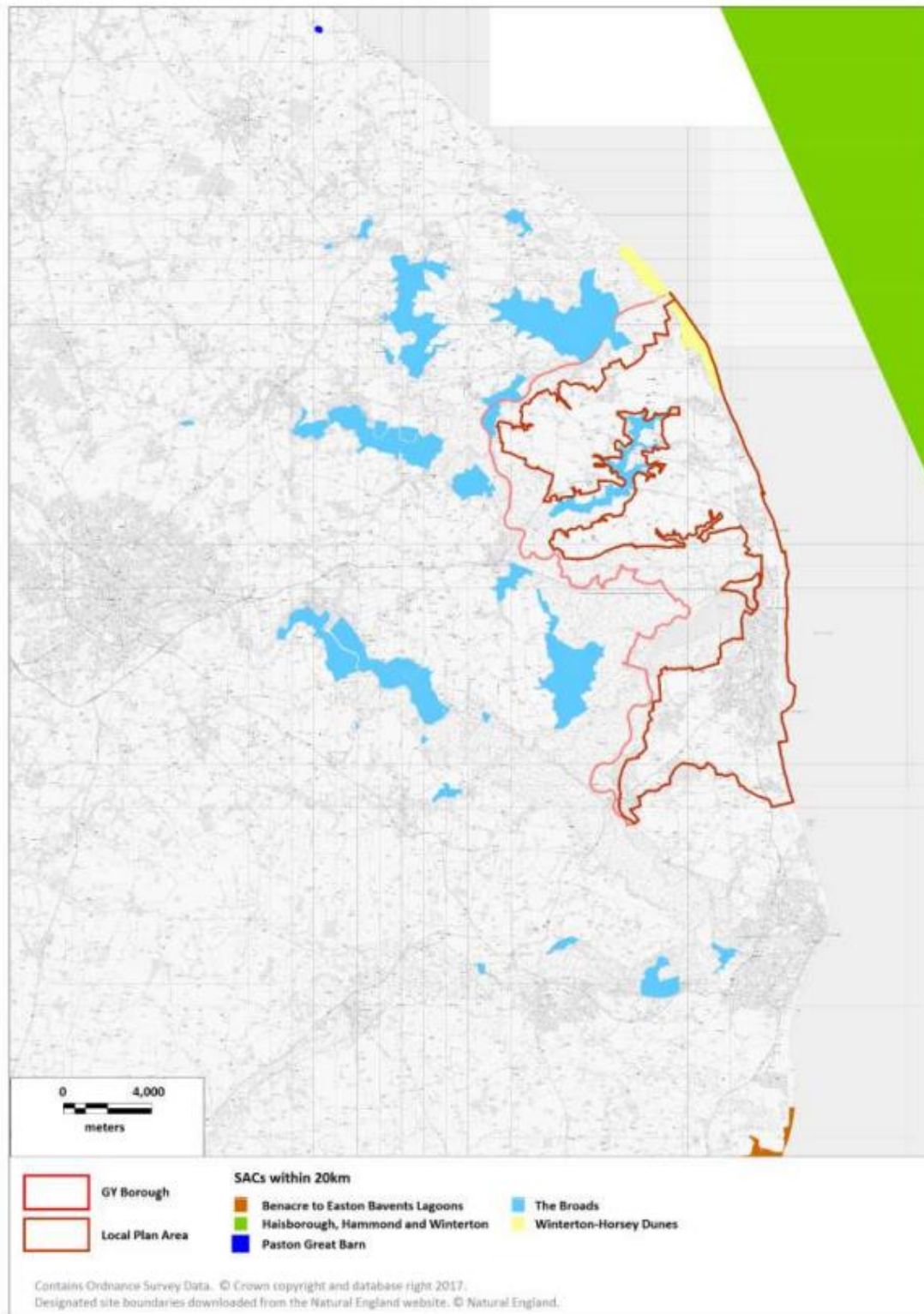


Map 3: Ramsar sites where boundary within 20km of Suffolk Coastal District

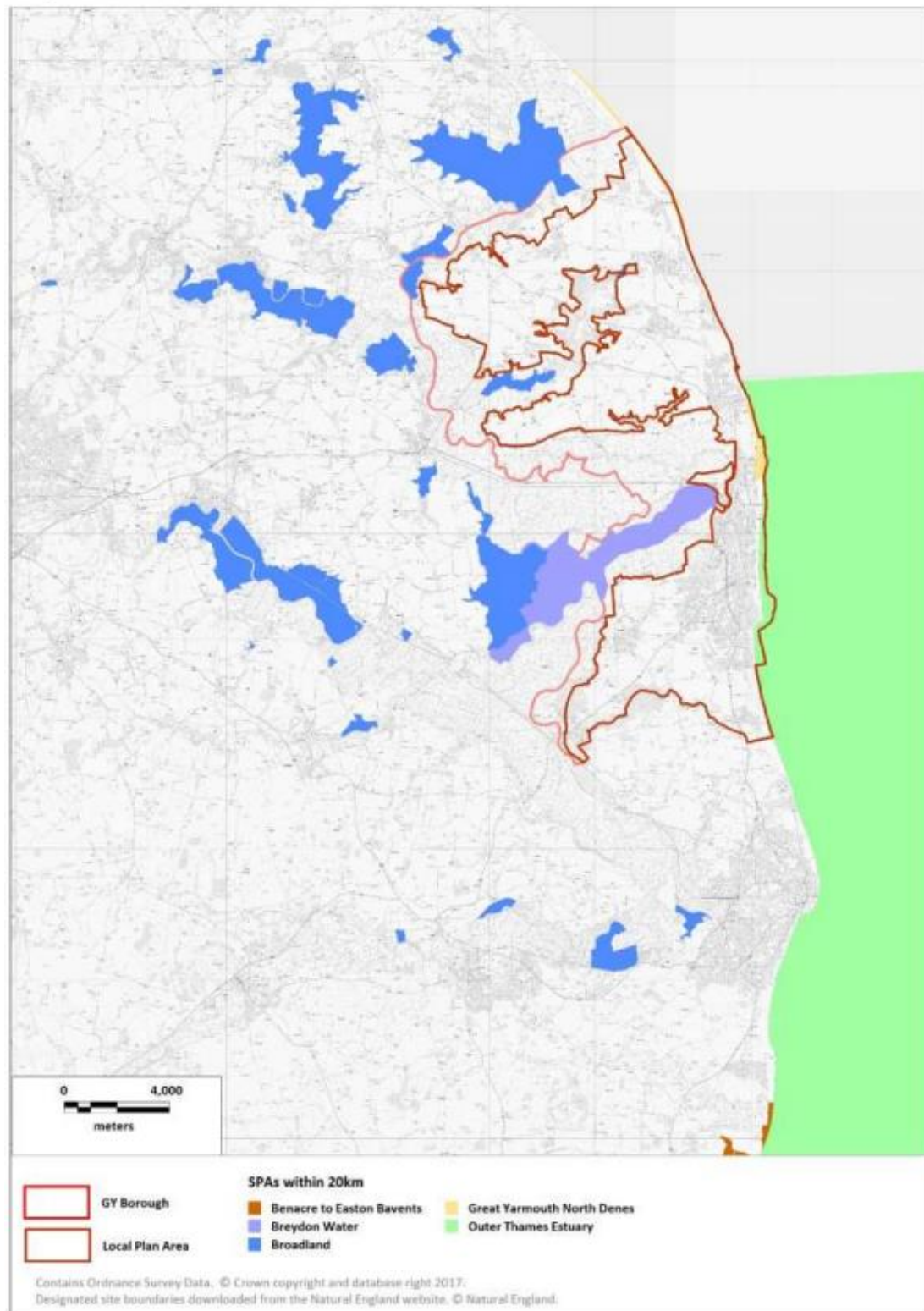


Habitat sites within 20km of the Great Yarmouth Local
Plan Area

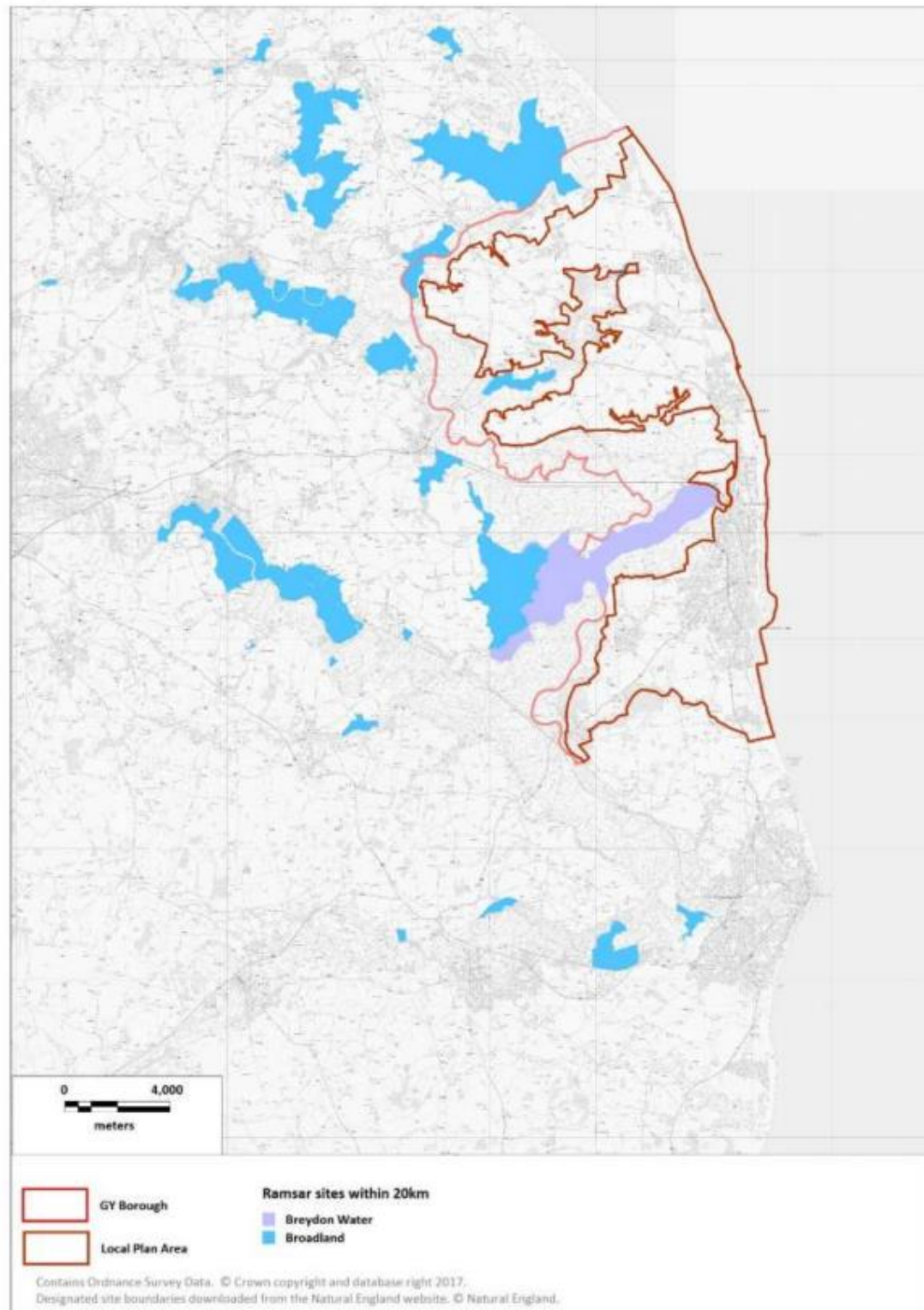
Map 1: SACs and Local Plan Area



Map 2: SPAs and Local Plan Area

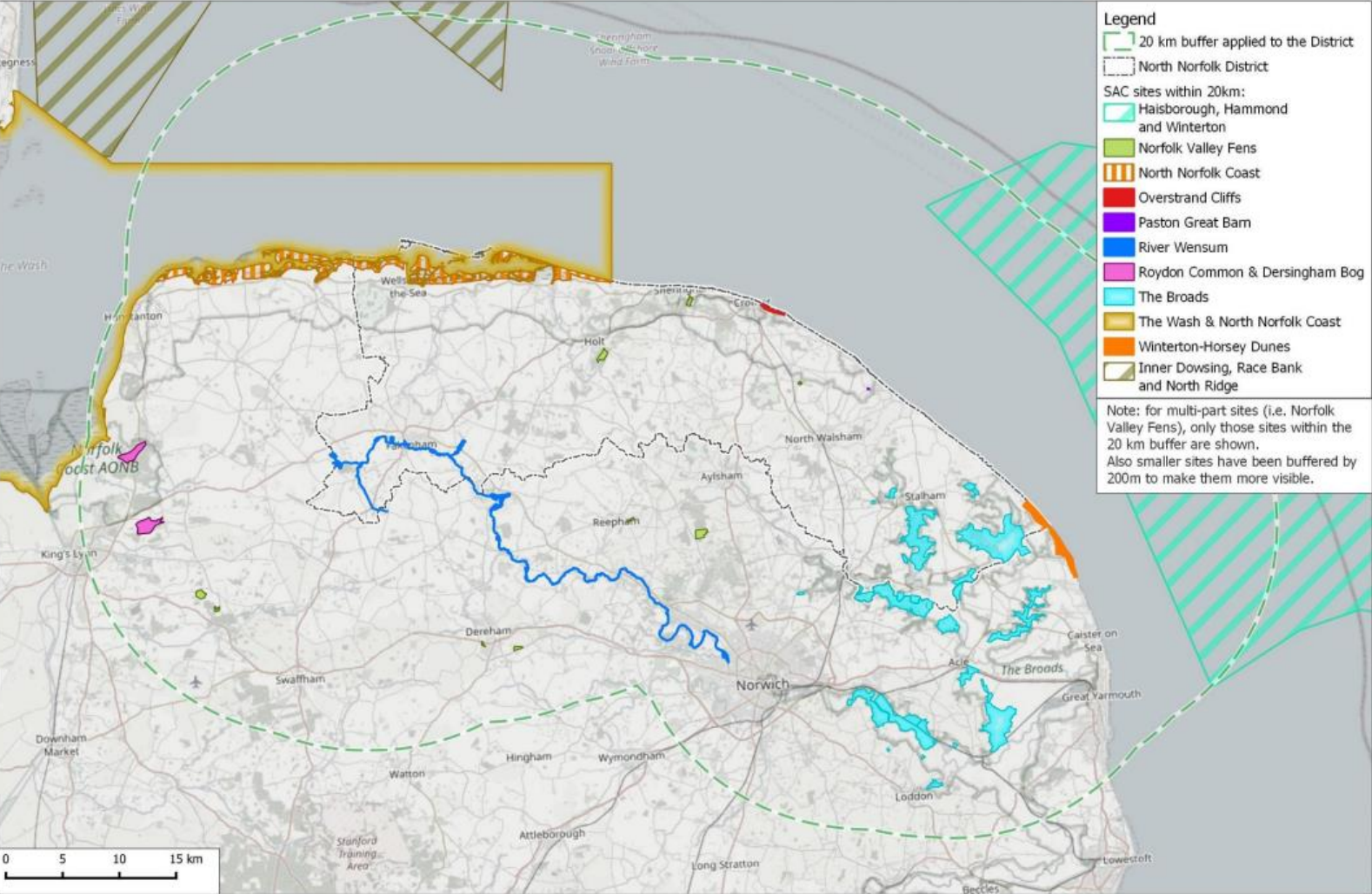


Map 3: Ramsar sites and Local Plan Area



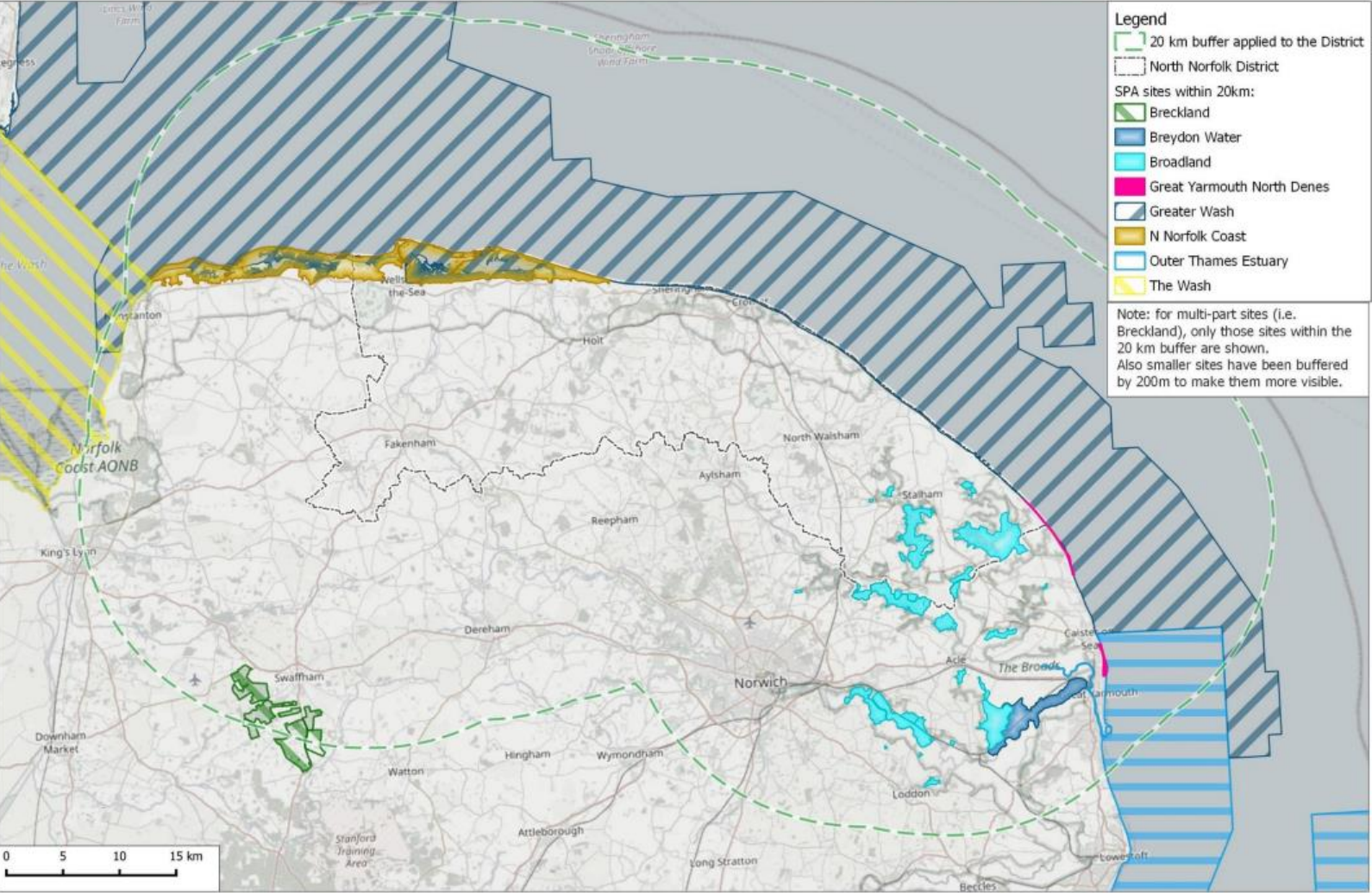
Habitat sites within 20km of the North Norfolk Local
Plan Area

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



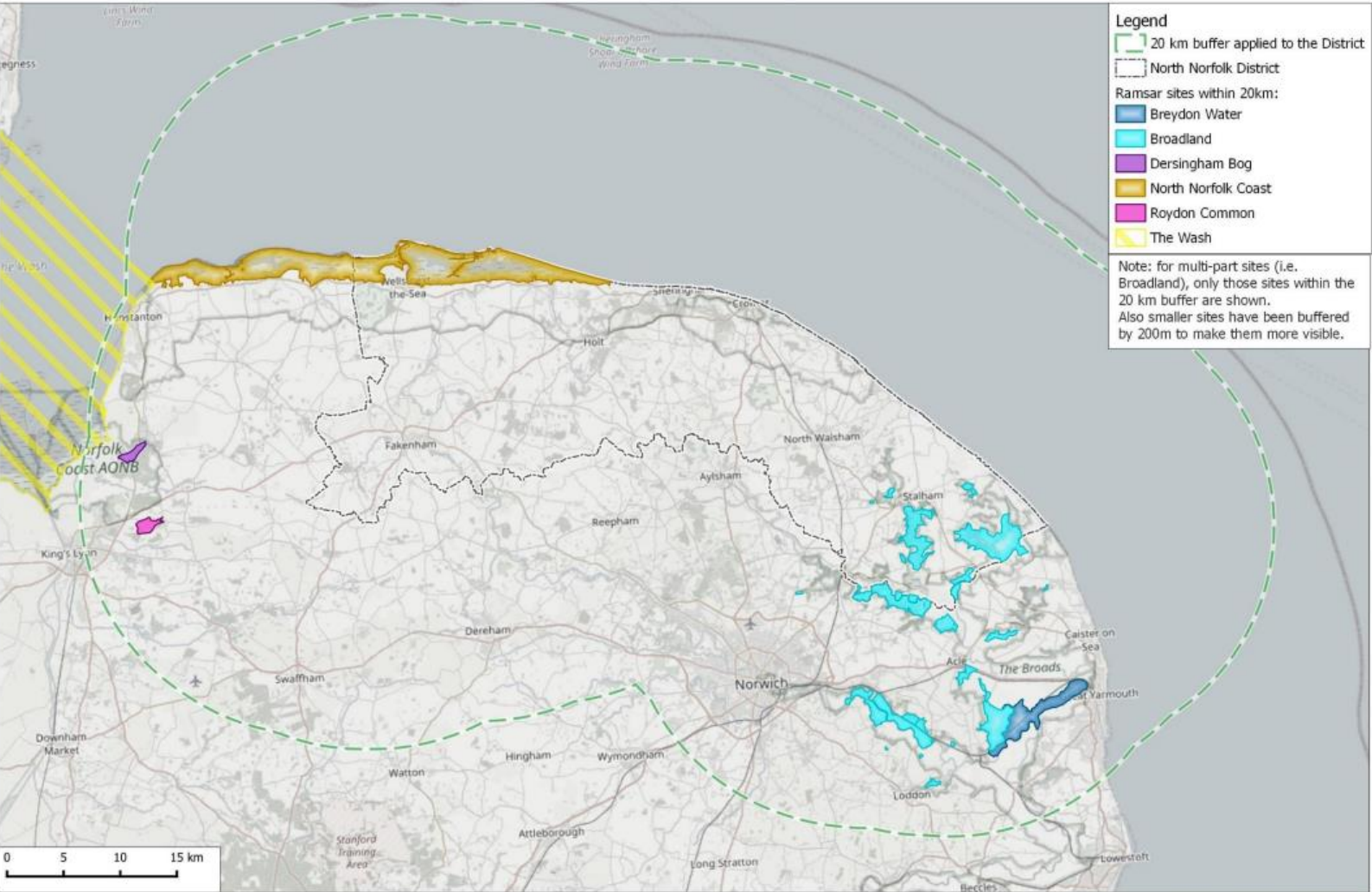
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Map 3: SPA sites located entirely or partially within a 20 km buffer of the North Norfolk District.



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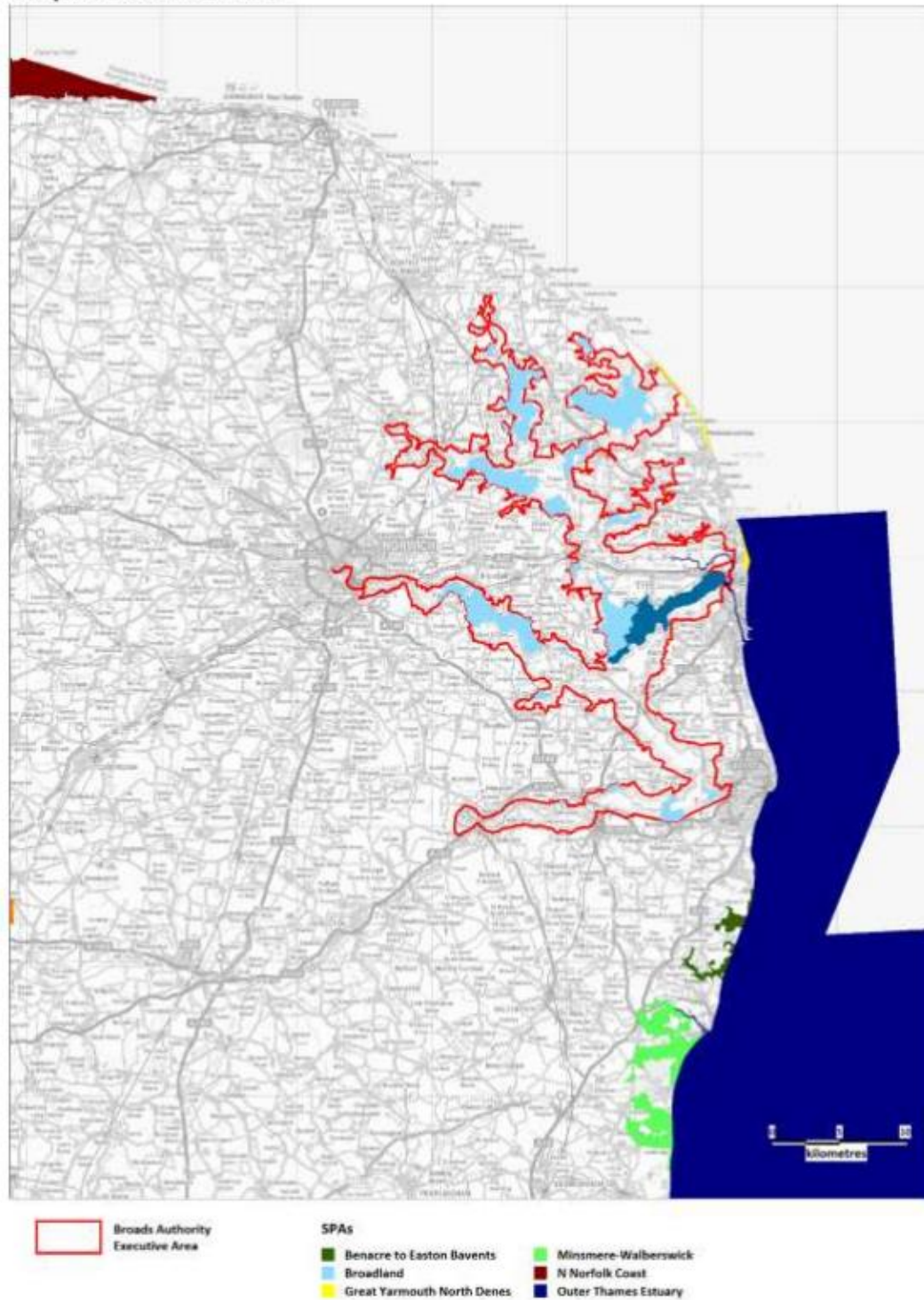
Map 4: Ramsar sites located entirely or partially within a 20 km buffer of the North Norfolk District.



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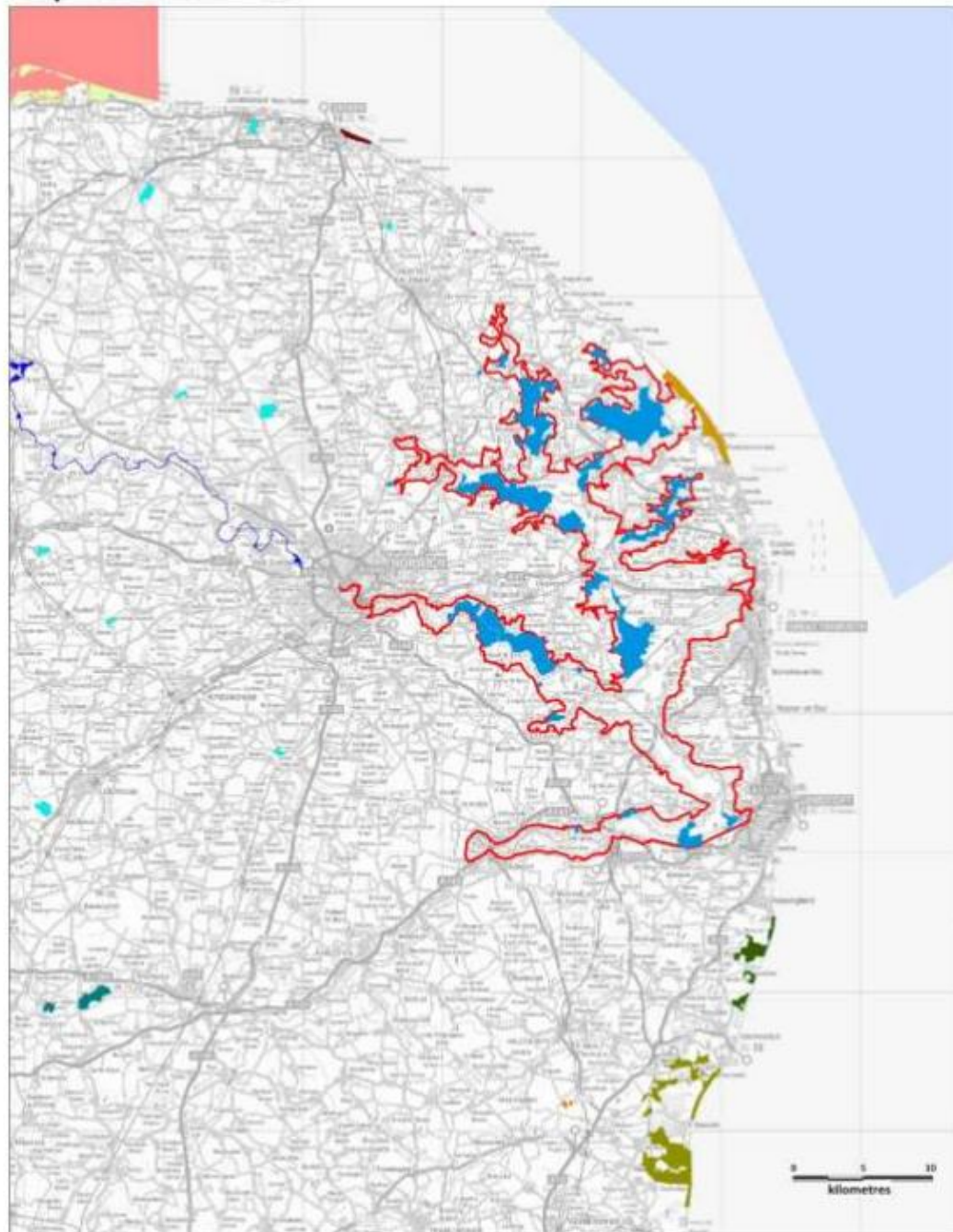
Habitat sites within 20km of The Broads Authority Local
Plan Area

Map 2: Selected SPAs



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Map 3: Selected SACs

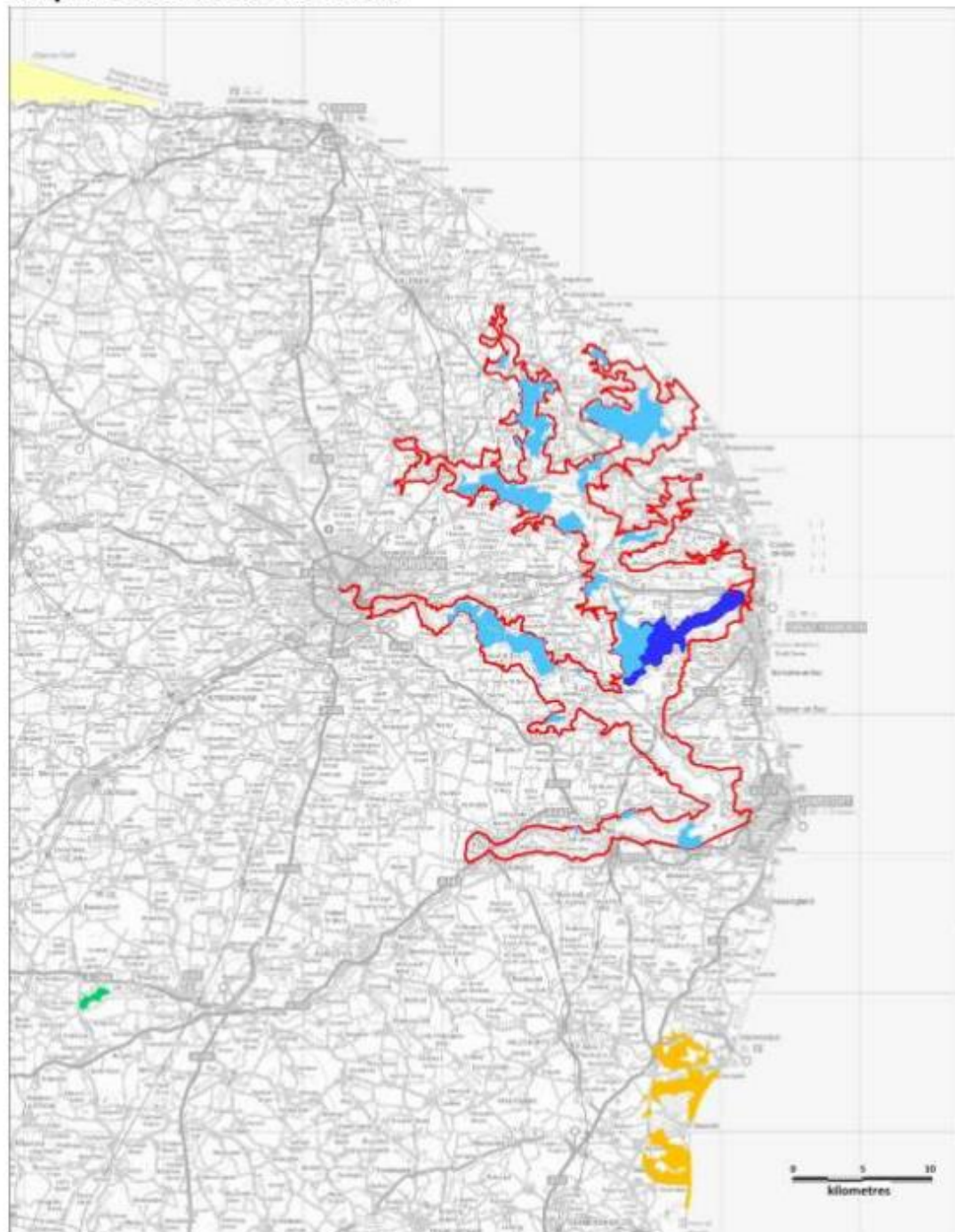


SACs

- | | | |
|--|---------------------|-----------------------------------|
| Benacre to Easton Bavents Lagoons | North Norfolk Coast | The Wash & North Norfolk Coast |
| Dew's Ponds | Overstrand Cliffs | Waveney & Little Ouse Valley Fens |
| Halsborough, Hammond and Winterton | Paston Great Barn | Winterton-Horsey Dunes |
| Minisere to Walberswick Heaths & Marshes | River Wensum | |
| Norfolk Valley Fens | The Broads | |
| | | Broads Authority Executive Area |

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Map 4: Selected Ramsar Sites



Ramsar Sites

- Breydon Water
- Broadland
- Minsmere-Walberton
- North Norfolk Coast
- Redgrave & South Lopham Fens



Broads Authority Executive Area

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Appendix 3: Relevant Habitat sites

Name	Qualifying features	Conservation Objectives
Special Areas of Conservation		
Alde-Ore and Butley Estuaries	H1130:Estuaries H1140: Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats H1330: Atlantic salt meadows	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; The supporting processes on which qualifying natural habitats rely.
Benacre to Easton Bavents Lagoons	H1150# Coastal lagoons, A195(B) <i>Sterna albifrons</i> : Little tern A021(B) <i>Botaurus stellaris</i> : Great bittern A081(B) <i>Circus aeruginosus</i> : Eurasian marsh harrier	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats, The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.
Breckland	H2330 Inland dunes with open <i>Corynephorus</i> and <i>Agrostis</i> grasslands H3150 Natural eutrophic lakes with <i>Magnopotamion</i> or <i>Hydrocharition</i> H4030 European dry heaths H6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-</i>	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of the habitats of qualifying species, The structure and function of the habitats of qualifying species,

	Brometalia), (note that this includes the priority feature "important orchid rich sites") H91E0# Alluvial woods with A. glutinosa, F. excelsior S1166 Great crested newt, Triturus cristatus	The supporting processes on which the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.
Dew's Ponds	S1166 Triturus cristatus: Great crested newt	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of the habitats of qualifying species, The structure and function of the habitats of qualifying species, The supporting processes on which the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.
Haisborough, Hammond and Winterton	H1110 Sandbanks which are slightly covered by sea water all the time H1170 Reefs	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of the habitats of qualifying species, The structure and function of the habitats of qualifying species, The supporting processes on which the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.

Inner Dowsing, Race Bank and North Ridge	H1110 Sandbanks which are slightly covered by sea water all the time H1170 Reefs	The Conservation Objective for the Inner Dowsing, Race Bank and North Ridge SAC is to maintain or restore the habitat Annex 1 Sandbanks which are slightly covered by seawater all the time in Favourable Condition, and the habitat Annex I reef in Favourable Condition.
Minsmere to Walberswick Heaths and Marshes	H4030 European dry heaths H1210 Annual vegetation of drift lines H1220 Perennial vegetation of stony banks A052(B) Anas crecca: Eurasian teal A021(B) Botaurus stellaris: Great bittern A081(B) Circus aeruginosus: Eurasian marsh harrier A082(NB) Circus cyaneus: Hen harrier A224(B) Caprimulgus europaeus: European nightjar A056(B) Anas clypeata: Northern shoveler A056(NB) Anas clypeata: Northern shoveler A051(B) Anas strepera: Gadwall A051(NB) Anas strepera: Gadwall A132(B) Recurvirostra avosetta: Pied avocet A195(B) Sterna albifrons: Little tern A394(NB) Anser albifrons albifrons: Greater white-fronted goose	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats, The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.
Norfolk Valley Fens	H4010 Northern Atlantic wet heaths with Erica tetralix H4030 European dry heaths H6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco-Brometalia), (note that this includes the priority feature "important orchid rich	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats,

	sites") H6410 Molinia meadows on calcareous, peat or clay-silt soil H7210# Calcareous fens with <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>	The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.
North Norfolk Coast	H1150# Coastal lagoons H1220 Perennial vegetation of stony banks H1420 Mediterranean and thermo-Atlantic halophilous scrubs (<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>	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats, The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.
Orfordness – Shingle Street	H1150: Coastal Lagoons H1210: Annual vegetation of drift lines H1220: Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.

Overstrand Cliffs	H1230 Vegetated sea cliffs of the Atlantic and Baltic coasts	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.
River Wensum	H3260 Water courses of plain to montane levels with <i>R. fluitantis</i> S1016 Desmoulin's Whorl Snail, <i>Vertigo moulinsiana</i> S1092 Freshwater Crayfish, <i>Austropotamobius pallipes</i> S1096 Brook Lamprey, <i>Lampetra planeri</i> S1163 Bullhead, <i>Cottus gobio</i>	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats of qualifying species The structure and function (including typical species) of qualifying natural habitats The structure and function of the habitats of qualifying species The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely The populations of qualifying species, and, The distribution of qualifying species within the site.
Roydon Common and Dersingham Bog (also Ramsar)	H4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> H4030 European dry heaths	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site

	H7150 Depressions on peat substrates of the Rhynchosporion Mixed lowland valley mire Wetland invertebrate assemblage	contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.
Staverton Park and The Thicks, Wantisden	H9190: Old acidophilous oak woods with <i>Quercus robur</i> on sandy plains; Dry oak-dominated woodland.	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.
The Broads	H7210# Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> S1016 <i>Vertigo moulinsiana</i> : Desmoulin's whorl snail H7230 Alkaline fens H6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) H91E0# Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, <i>Salicion albae</i>) H7140 Transition mires and quaking bogs	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats of qualifying species, The structure and function (including typical species) of qualifying natural habitats, The structure and function of the habitats of qualifying species,

	<p>H3140 Hard oligo-mesotrophic waters with benthic vegetation of Chara spp</p> <p>H3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation</p> <p>S1355 Lutra lutra: Otter</p> <p>S1903 Liparis loeselii: Fen orchid</p> <p>S4056 Anisus vorticulus: Little ramshorn whirlpool snail</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>
The Paston Great Barn	S1308: Barbastelle bat Barbastella barbastellus	<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,</p> <p>The structure and function of the habitats of qualifying species,</p> <p>The supporting processes on which 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>
The Wash and North Norfolk Coast	<p>H1110 Sandbanks which are slightly covered by sea water all the time</p> <p>H1140 Mudflats and sandflats not covered by seawater at low tide</p> <p>H1150# Coastal lagoons</p> <p>H1160 Large shallow inlets and bays</p> <p>H1170 Reefs</p> <p>H1310 Salicornia and other annuals colonising mud and sand</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>

	H1330 Atlantic salt meadows (<i>Glaucopuccinellietalia maritima</i>) H1420 Mediterranean and thermo-Atlantic halophilous scrubs (<i>Sarcocornetea fruticosi</i>) S1355 Otter, <i>Lutra lutra</i> S1365 Harbour (Common) Seal, <i>Phoca vitulina</i>	<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>
Winterton-Horsey Dunes	H2150# Atlantic decalcified fixed dunes (<i>Calluno-Ulicetea</i>) H2190 Humid dune slacks H2110 Embryonic shifting dunes H2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes")	<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 qualifying natural habitats</p> <p>The structure and function (including typical species) of the qualifying natural habitats, and,</p> <p>The supporting processes on which the qualifying natural habitats rely</p>
Special Protection Areas		
Alde-Ore Estuary (also Ramsar site)	<p>A081: Eurasian marsh harrier (breeding)</p> <p>A132: Pied avocet (non-breeding)</p> <p>A132: Pied avocet (breeding)</p> <p>A151: Ruff (non-breeding)</p> <p>A162: Common redshank (non-breeding)</p> <p>A183: Lesser black-backed gull (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>

	A191: Sandwich tern (breeding) A195: Little tern (breeding)	The structure and function of the habitats of the qualifying features; The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.
Benacre to Easton Bavents	H1150# Coastal lagoons, A195(B) <i>Sterna albifrons</i> : Little tern A021(B) <i>Botaurus stellaris</i> : Great bittern A081(B) <i>Circus aeruginosus</i> : Eurasian marsh harrier	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features rely, The population of each of the qualifying features, and, The distribution of the qualifying features within the site.
Breckland	Nightjar, <i>Caprimulgus europaeus</i> - A224, b Stone-curlew, <i>Burhinus oedicephalus</i> - A133, b Woodlark, <i>Lullula arborea</i> - A246, b	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features rely, The population of each of the qualifying features, and,

		The distribution of the qualifying features within the site.
Broadlands (also Ramsar site)	<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> (Alno-Padion, Alnion incanae, <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 <i>Hydrocharition</i>-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 condition5 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	<p>Common Scoter, <i>Melanitta nigra</i> - A065, nb</p> <p>Common Tern, <i>Sterna hirundo</i> - A193, b</p> <p>Little Gull, <i>Hydrocoloeus (Larus) minutus</i> - A177, nb</p> <p>Little Tern, <i>Sternula albifrons</i> - A195, b</p> <p>Red-throated Diver, <i>Gavia stellata</i> - A001-A, nb</p> <p>Sandwich Tern, <i>Thalasseus sandvicensis</i> - A191, 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>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: Red-throated Diver (Non-breeding)</p> <p>A195: Common Tern (Breeding)</p> <p>A193: Little Tern (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>
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 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)	<p>A046a: Dark bellied brent goose (non-breeding)</p> <p>A054: Northern pintail (non-breeding)</p> <p>A132: Pied avocet (non-breeding)</p> <p>A141: Grey plover (non-breeding)</p> <p>A143: Red knot (non-breeding)</p> <p>A149: Dunlin (non-breeding)</p> <p>A156: Black-tailed godwit (non-breeding)</p> <p>A162: Common redshank (non-breeding)</p> <p>Waterbird assemblage</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>
The Wash (also Ramsar)	<p>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>	<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



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

BY EMAIL ONLY

Dear Laura Mundy

Natural England's response to the consultation on the draft strategic environmental assessment for the coastal adaptation supplementary planning document

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Thank you for the opportunity to comment on the draft strategic environmental assessment and Habitat Regulations Assessment that relate to the coastal adaptation supplementary planning document.

Summary of response:

- Natural England looked for consistency of language between coastal adaptation supplementary planning document (SPD), the Shoreline Management Plan (SMP) and the Local Plans so that policies can be interpreted clearly and implemented correctly by planners and relevant stakeholders
- We recognise that there is generally a consistency of language between the SPD and the relevant planning policies they relate to (i.e. Local and Neighbourhood Plans)
- The SPD does a good job of explaining the hierarchy of embedded policy details clearly (e.g. Coastal Management Areas are identified in Local Plans which are derived from SMPs)
- We concur with the conclusions of the documents presented to us that the coastal adaptation SPD does not require an EIA
- We also concur with the conclusions of the Habitat Regulations Assessment (HRA) on the coastal adaptation SPD that it will not lead to likely significant effects on protected European sites

Natural England is pleased with the approach and cooperation between the planning authorities across the Norfolk and Suffolk coastline to establish this joined up strategic approach and welcome the delivery of this work, which seeks to establish a consistent interpretation of policies related to coastal change and adaptation along the Norfolk and Suffolk coastline.

We understand that the aim of the SPD is to provide guidance on the correct interpretation of planning policy and aid the implementation of relevant policies and it cannot create new or amend existing planning policies nor can it prescribe that particular areas of land be developed for particular uses. On this basis Natural England does not wish to offer substantive comments on the SPD as this is the role of Development Plans of each Local Authority. However, please see below some very brief comments on the SPD.

Comments

Section 4.29 SPD: *"Open Land Uses Open land uses are likely to be appropriate within the CCMA and indeed may be encouraged as part of the implementation of 'roll-back' proposals and could include Biodiversity Net Gain".* What leavers and/or mechanisms will be used to encourage the implementation of roll-back in this context? A reference to local plan policies would be useful here if available.

Section 4.45 (Table 2): It would be easier to interpret the table if the explanations of Level A and B CEVA" (section 4.47) came before the table.

Section 5.7 and 5.8 SPD: In the "Identifying alternative sites or land" and "Identifying appropriate site sizes" sections of the SPD, there is no reference to European Designated sites in the guidance around identification of alternative and appropriate sites. Natural England would like to point out that any alternative sites should seek to avoid likely significant effects if on or near European Designated sites and not undermine the sites conservation objectives.

General comments - Coastal SPD HRA: Document refers to both Supplementary Planning document and SPD interchangeably. Once the SPD acronym has been introduced, it is more concise to use the abbreviated SPD.

Draft Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment screening opinions

Natural England are satisfied with the conclusions of the SEA and HRA Screening Documents; it is not necessary for a SEA to be undertaken in relation to the SPD and we agree with the conclusion of the HRA Screening Statement. Implementation of the SPD will not lead to likely significant effects on protected European sites and therefore no further assessment is necessary

Should the proposal change, please consult us again.

If you have any queries relating to the advice in this letter please contact me [REDACTED]
[REDACTED]

Yours sincerely

Daniel Turner
Norfolk and Suffolk Team

Equality Impact Assessment Screening Opinion

Draft Coastal Adaptation Supplementary Planning Document

October 2022



Introduction

1. It is a Council's/Broads Authority's duty under the Equality Act 2010 to undertake an Equality Impact Assessment at the time of formulating a decision, drafting a report, designing or amending a policy. This will ensure that the Council is considering and taking positive action where possible to promote access to services for all their communities, including their wider communities. The Equality Impact Assessment Screening Assessment will assess whether there is any impact upon any of the groups with protected characteristics under the Equalities Act, which are listed in the table below. If an adverse impact upon any of these groups is identified, then a full Equalities Impact Assessment will be required.
2. The Coastal Adaptation SPD is being produced jointly by East Suffolk Council (the lead authority), North Norfolk District Council, Great Yarmouth Borough Council and the Broads Authority. Coastal Partnership East – a single team of coastal officers who work across and for North Norfolk, Great Yarmouth and East Suffolk – are also a partner. This Equality Impact Assessment Screening Assessment has been prepared by East Suffolk Council on behalf of all four authorities.
3. North Norfolk District Council Core Strategy policy EN10 (Development and Flood Risk) provides policy guidance about how development should be planned and managed in relation to flood risk. Policy EN11 (Coastal Erosion) provides policy guidance about development in areas at risk from coastal erosion/change. Policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion risk) provides policy guidance about the relocation and replacement of development damaged or destroyed by coastal erosion.
4. Great Yarmouth Borough Council Local Plan Part 2 includes two policies about flood risk and coastal change. Policy EN1 (Flood Risk) provides policy guidance about development and flood risk. Policy EN2 (Relocation from Coastal Change Management Areas) provides guidance about the relocation of development away from areas that are experiencing coastal change.
5. East Suffolk District Council was formed by the merger of Suffolk Coastal District Council and Waveney District Council in 2019. Both of the former Districts have adopted local plans, which contain policy guidance about coastal change and adaptation. Suffolk Coastal Local Plan policy SCLP9.3 (Coastal Change Management Area) sets out the policy position regarding development in areas that area at risk from coastal erosion/change. SCLP9.4

(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:

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	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 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	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 racial backgrounds.</p>
G	Religion or Belief	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</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>

			The draft SPD consultation will therefore not discriminate in terms of sexual identity.
I	Sexual orientation	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 consultation will therefore not discriminate in terms of sexual orientation.</p>
J	Socio-economic deprivation	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,</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.

CABINET



URN: 23-144

Report Title : Supplementary Planning Documents – Initial Consultation Delegation

Report to: Cabinet

Date of meeting : 9 October 2023

Responsible Cabinet Member: Cllr Daniel Candon

Responsible Director / Officer : Sam Hubbard – Strategic Planning Manager

Is this a Key decision ? No

EXECUTIVE SUMMARY / INTRODUCTION FROM CABINET MEMBER

This report requests delegated authority to the Head of Planning to approve the first stages of consultation on Supplementary Planning Documents.

RECOMMENDATION

That Cabinet: delegate authority to the Head of Planning, in consultation with the Cabinet Member with responsibility for Strategic Planning, to approve the first stages of public consultation on future emerging Supplementary Planning Documents as and when they are prepared.

1. Introduction

- 1.1. Supplementary Planning Documents (SPD) build upon and provide more detailed advice or guidance on policies in an adopted local plan. They do not form part of the 'development plan' but are a material consideration in the determination of planning applications. The Council currently have four adopted Supplementary Planning Documents (SPD) for Hall Quay, North Quay, Open Space provision and a design guide for Shopfronts.
- 1.2. The Town and Country Planning (Local Planning) Regulations 2012 require at least two stages of consultation during the preparation of an SPD. Firstly, consultation is required during the initial preparation of the document to inform a draft SPD. This consultation is typically more informal and could be in a questionnaire format (such as the initial consultation on the North Quay SPD) or in the form of a first draft of the SPD. More than one consultation could be undertaken if necessary and some consultations could be more tailored to be focussed on certain interest groups. The point of consultation at this stage is to give people an early say on the content of the SPDs before the Council has formalised a final position on the matter.
- 1.3. Once a final draft of the Supplementary Planning Document has been prepared it must then be subject to a more formal public consultation prior to adoption.

- 1.4. In order to support the timely production of these documents, the Policy and Resources Committee in September 2021 gave delegated authority to the then Director of Planning and Growth, in consultation with the Local Plan Working Party and the Chairman of Policy and Resources Committee, to approve public consultation at the initial stages of preparation as detailed above. Given the new constitution and new executive structure of the Council it is considered necessary to renew this delegation. As such this report now requests this delegation is given to the Head of Planning in consultation with the Cabinet Member with responsibility for Strategic Planning.
- 1.5. The formal stage of consultation on the final draft of the SPD will still be subject to approval by Cabinet. Cabinet also has the responsibility for adoption of SPDs on behalf of the Council.

2. Financial Implications

- 2.1. No direct implications. Some staff resource will be saved during the preparation of SPDs.

3. Legal and Risk Implications

- 3.1. The risks are considered minimal. Delegation is only being requested for the informal consultation stages during the preparation of the SPD. Approval for consultation on a final draft SPD will still be overseen by Cabinet. The powers to prepare an SPD are outlined within the Planning and Compulsory Purchase Act 2004 and the Town and County 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.

4. Conclusion

- 4.1. Supplementary Planning Documents require at least two stages of consultation. To ensure the timely production of future Supplementary Planning Documents as and when they are prepared it is requested that delegated authority is given to approve the first, informal, stages of consultation. This delegated authority is proposed to be given to the Head of Planning in consultation with the Cabinet Member with responsibility for Strategic Planning.

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:	Yes
Section 151 Officer Consultation:	Through ELT
Existing Council Policies:	n/a
Financial Implications (including VAT and tax):	n/a – covered by usual staff operating costs.
Legal Implications (including human rights):	n/a
Risk Implications:	n/a
Equality Issues/EQIA assessment:	n/a

Crime & Disorder:	n/a
Every Child Matters:	n/a

CABINET

URN : 23-247

Report Title : Rural England Prosperity Fund (REPF) Grant Scheme

Report to: Cabinet

Date of meeting : 9 October 2023

Responsible Cabinet Member: Cllr Daniel Candon

Responsible Director / Officer : Executive Director of Place, Natasha Hayes

Is this a Key decision ? Yes

Date added to Forward Plan of Key Decisions if a Key Decision: 5 September 2023



EXECUTIVE SUMMARY / INTRODUCTION FROM CABINET MEMBER

The Rural England Prosperity Fund (REPF) forms part of the UK Shared Prosperity Fund (UKSPF) Investment Plan and covers similar themes to the old EU rural programmes. REPF is additional UKSPF funding which has been allocated to rural areas in recognition of their specific needs, including connectivity, access to key services and lower economic development rates.

GYBC was allocated £400,000 REPF funding over the period 2023/24 and 2024/25. The REPF prospectus sets out an expectation that the funds are distributed to external beneficiaries. This report provides an overview of the delegated, discretionary grant scheme that has been designed for the Borough and the proposed approach to implementation, delivery and reporting.

RECOMMENDATIONS :

That Cabinet :

- notes and considers the proposed grant scheme and process
- delegates delivery of the scheme outlined herein to officers, with regular ongoing reporting to be aligned with the UKSPF programme

1. Introduction

- 1.1. Following consultation with ELT, the Leader and the Town Board, a £400,000 Rural England Prosperity Fund (REPF) addendum to the Borough's main UKSPF Investment Plan was submitted for Government inspection on 30 November 2022. This was approved, unmodified, and an MoU was signed on 2 June 2023.
- 1.2. REPF can be viewed as a replacement for the EU-backed RDPE/LEADER grant funding that was targeted at rural businesses in support of the EU Common Agriculture Policy. It was designed to support activities that address the particular challenges rural areas face, including business diversification and development, farm business diversification and community infrastructure with the aim of improving productivity and strengthening the rural economy and rural communities.
- 1.3. There is no new capacity funding to administer/deliver REPF and there was a clear presumption in the prospectus that the funds would be distributed to external beneficiaries.

2. Work to Date / Proposal

- 2.1. There are two REPF Investment Priorities, with several subsidiary interventions:

Investment Priority 1: Supporting Rural Business (£340,000 across the period 2023/24 and 2024/25)

- Capital grants for small scale investment in micro and small enterprises in rural areas
- Capital grants for growing the local social economy and supporting innovation
- Capital grants for the development and promotion (both trade and consumer) of the visitor economy

Investment Priority 2: Supporting Rural Communities (£60,000 across the period 2023/24 and 2024/25)

- Capital grants for impactful volunteering and social action projects to develop social and human capital in local places

- 2.2. The financial breakdown by intervention presented in *Annex 1* is indicative but the respective budget allocations correspond to the associated outputs and outcomes. Examples of the types of eligible projects and expenditure eligible for grant support are presented in *Annex 2*, alongside the approved outputs and outcomes, split by intervention.

- 2.3. There are strict geographical eligibility criteria, with potential beneficiaries limited to an area effectively comprising the Borough minus Great Yarmouth, Gorleston and Bradwell. For reference, the REPF-eligible area can be found at:

<https://magic.defra.gov.uk/MagicMap.aspx> – then select ‘Administrative Geographies’ > ‘Other Administrative Boundaries’ > ‘Rural England Prosperity Fund’

3. Impact / Next Steps

- 3.1. It is recommended that capital grant support for projects provides a maximum of 50% of eligible project costs. The average award is estimated to be £20,000, corresponding to the ‘tipping point’ required to incentivise these kinds of capital investments and extend access to the scheme to as many beneficiaries as possible.
- 3.2. As per other UKSPF-funded delegated grants, it is recommended that this scheme should be administrated by the Inward Investment Team, using the same processes.
- 3.3. A delegated grant scheme process has been developed by the Inward Investment service in partnership with the designated Finance officer. This draws directly on officers’ previous development and delivery of successful schemes.
- 3.4. The core two-stage system, processes and controlled documentation have been provisionally ‘re-skinned’ for each UKSPF scheme – and REPF – in order to streamline back-office administration. This integrates UKSPF-specific guidance and conditions, including the eligibility of expenditure and beneficiaries.
- 3.5. Updates will be provided to local members and the portfolio holder for economic development on the projects funded after each grant funding round.

3.6. The proposed grant administration process is as follows:

(a) Design, scheduling and promotion of calls for expressions of interest

It is proposed that officers design, schedule, publish and promote periodic 'calls' for expressions of interest (EOIs) – a simple web-based form – aligned to the funding profile (*Annex 1*) and the contracted outputs/outcomes (*Annex 2*) with a two- or three-week application window. These will package up capital grant funding and associated outputs/outcomes.

This would be undertaken by the Business Advisor, with the promotion of calls for expressions of interest for capital grant support for projects via Council-controlled channels, press releases, ward members, links to officers' industry contacts and third-party organisations (such as Barclays' rural banking business and the NFU) and the Norfolk Investment Framework Facilitator at Norfolk County Council, who was previously involved in the delivery of RDPE/LEADER funding and has been invited to join the Town Board in order to satisfy REPF 'Local Partnership Group' specifications.

(b) Pre-qualification screening

At the close of the EOI submission window, the Business Advisor would undertake gateway checks, quickly sifting EOIs for potentially eligible projects and inviting these to complete a more-detailed full application form.

(c) Full application

Approved expressions of interest would be offered advice/assistance in the preparation of more-detailed full application forms by the Business Advisor on the basis that they would not be involved, in any way, with subsequent due diligence or decision-making.

Previous grant schemes have demonstrated a significant increase in the quality/eligibility of applications that have been facilitated/supported by project officers. It is proposed that applicants would be given three weeks to complete a full application and assemble the supporting documents (e.g. quotes).

(d) Full application due diligence

This would include a number of due diligence checks (e.g. procurement, beneficiary eligibility, financial standing, eligibility of proposed costs, deliverability etc.) corresponding to obligations around the handling of public funds and the specific requirements of UKSPF/REPF. Due diligence would be undertaken by the Economic Growth Manager, ensuring clear separation and independence from any pre-application support/facilitation provided by other officers.

(e) Financial scrutiny

This would be undertaken by the designated officer within the Finance team, encompassing the verification of capital costs on the basis of the due diligence supplied at the previous stage.

(f) **Consideration by grants panel**

A grants panel would be convened with formal terms of reference, comprising the Executive Director of Place, Head of Inward Investment, Head of Health Integration and Communities and designated Finance Officer.

The panel would consider all full applications received in response to a specific call and distribute the allocated funding and any additional conditions on a best-value basis to one or more (or no) applicants from the information presented in the application documentation, the due diligence summary report and any additional commentary from Finance.

(g) **Grant offer issue**

The grant offer letter template has also been drafted and is being reviewed by nplaw. The minuted decisions of the grants panel would be transposed into that document, alongside standard terms and conditions (e.g. the expiration date of the offer). Grants could not be awarded retrospectively, with eligible expenditure by beneficiaries taking place only after the issue of an offer to ensure clear 'additionality'.

(g) **Grant claim by beneficiary**

The Business Advisor would offer further assistance with grant claims, bringing together evidence of outputs/outcomes and defrayal in line with the terms of the original offer.

(h) **Grant claim screening**

This would be undertaken by the Economic Growth Manager to ensure the provision of originals or certified copies of the supporting evidence. The designated Finance Officer will then review and counter-sign any authorisations to settle claims.

4. Financial Implications

- 4.1. REPF capital funding of £400,000 over 2023/24 (£160,000) and 2024/25 (£240,000) has been secured from Government, fully capitalising the delegated grant scheme in *Section 3*. Internal resources to administer these schemes are already in place within the Inward Investment service; there is no new capacity funding to administer/deliver REPF. Government has indicated that unspent monies would be de-allocated by the Treasury.

5. Risk Implications

- 5.1. The distribution of delegated discretionary grants must be carried out in a manner that assures a) a competitive and transparent allocation process, and b) adherence to subsidy assessment and control requirements. The associated officers are experienced in every aspect the design and delivery of grant schemes, including COVID grants and other major publicly-funded business grants.

6. Legal Implications

- 6.1. Delivery of the approved REPF addendum is the subject of an MoU signed by the Secretary of State for Levelling Up, Housing and Communities and the Council on 2 June 2023.

7. Conclusion

- 7.1. This report provides members with an overview of the approved Rural England Prosperity Fund (REPF) addendum to the UK Shared Prosperity Fund (UKSPF) Investment Plan. The REPF prospectus set out a clear presumption that the funds would be distributed to external beneficiaries in the form of delegated, discretionary grant. Recommendations for the arrangements to deliver grant aid under REPF are set out and delegated authority for officers to proceed on that basis.

8. Background Papers

Annex 1: REPF approved budget breakdown by intervention

Annex 1: REPF approved outputs and outcomes by intervention and indicative eligible projects

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

Consultations	Comment
Monitoring Officer Consultation:	As part of ELT review
Section 151 Officer Consultation:	As part of ELT review
Existing Council Policies:	Not applicable
Equality Issues/EQIA assessment:	Not applicable; grant applicants and awardees will be determined on a competitive, transparent basis by factors other than protected characteristics – e.g. eligibility conferred by Government-defined geographies.

Rural England Prosperity Fund (REPF) interventions, outputs and outcomes

Total REPF award value		£400,000		
	% split by intervention	£ split by intervention	Allocation 2023/24	Allocation 2024/25
Investment Priority: Supporting rural business				
Capital grants for small scale investment in micro and small enterprises in rural areas	30%	£120,000	£48,000	£72,000
Capital grants for growing the local social economy and supporting innovation	15%	£60,000	£24,000	£36,000
Capital grants for the development and promotion (both trade and consumer) of the visitor economy	40%	£160,000	£64,000	£96,000
Investment Priority: Supporting rural communities				
Capital grants for impactful volunteering and social action projects to develop social and human capital in local places	15%	£60,000	£24,000	£36,000
% REPF award by Financial Year (i.e. approved split by FY)			40%	60%
£ REPF award by Financial Year (i.e. approved spend profile)			£160,000	£240,000
Grand total				£400,000

Rural England Prosperity Fund (REPF) interventions, outputs and outcomes

Rural England Prosperity Fund (REPF) interventions, outputs and outcomes

		Number of businesses supported	Number of farm businesses supported	Number of farm diversification projects supported	Number of micro businesses supported	Number of visitor experiences supported	Number of organisations receiving grants	Number of local events or activities supported	Number of projects supported	Jobs created	Jobs safeguarded	Number of new businesses created	Number of businesses adopting new to the firm technologies or processes	Number of businesses with improved productivity	Number of businesses experiencing growth	Number of businesses increasing their export capability	Number of businesses increasing their turnover	Volunteering numbers as a result of support	
Approved outputs/outcomes		Approved REPF outputs									Approved REPF outcomes								
		10	4	6	5	6	4	5	4	12	5	2	3	3	5	2	5	30	
Investment Priority	Supporting rural business																		
Intervention	Capital grants for small scale investment in micro and small enterprises in rural areas	→	→	→	→					→	→	→	→	→	→				
Footnote	Including capital funding for net zero infrastructure for rural businesses, and diversification of farm businesses outside of agriculture to encourage start up, expansion or scale up of these businesses where this involves converting farm buildings into other commercial or business uses.																		
UKSPF alignment	N/A: outputs and outcomes to be recorded under REPF "Funding (capital grants) for small scale investment in micro and small enterprises in rural areas"																		
Eligible projects	<ul style="list-style-type: none">Diversification projects that demonstrate wide economic multiplier effects like converting redundant buildings to business start-up units or new rural businessesProjects that add value to specialist food production models that create jobs and reflect a need to align local capability with emerging consumer preferences and new market segmentsProjects that create and develop new markets that shorten supply chains and increase business resilience, particularly when businesses work together to reduce costs and create efficienciesProjects that look to create higher-skilled, higher-value jobs	Can be used to deliver this output →	Can be used to deliver this output →	Can be used to deliver this output →	Can be used to deliver this output →					Can be used to deliver this outcome →	Can be used to deliver this outcome →	Can be used to deliver this outcome →	Can be used to deliver this outcome →	Can be used to deliver this outcome →	Can be used to deliver this outcome →				
Example expenditure	Creating event venues or farm tourism facilities such as accommodation, wedding venues and leisure facilities; provision of facilities for pet and equines such as kennels, livery and pet health venues; purchasing new process and packaging machinery such as brewing equipment and onsite vending machines; equipping development kitchens, or modernising existing kitchen equipment for increased energy efficiency or increased productivity through automation																		
Intervention	Capital grants for growing the local social economy and supporting innovation	→	→	→	→					→	→	→	→	→					
Footnote	Including community businesses, cooperatives and social enterprises																		
UKSPF alignment	E26: Growing the local social economy																		
Eligible projects	<ul style="list-style-type: none">Projects that support the uptake of technologies that improving efficiency, quality, resilience and productivity and embrace environmental efficiencies and green growthProjects that access advancements in the New Anglia agri-tech cluster to take pilot initiatives to marketProjects that bring artisan producers together to share facilities or touring services to help them move between markets	Can be used to deliver this output →	Can be used to deliver this output →	Can be used to deliver this output →	Can be used to deliver this output →					Can be used to deliver this outcome →	Can be used to deliver this outcome →	Can be used to deliver this outcome →	Can be used to deliver this outcome →	Can be used to deliver this outcome →	Can be used to deliver this outcome →				
Example expenditure	Creation of multifunctional rural business hubs providing shared workspace and networking opportunities for rural businesses (e.g. flexible access to commercial kitchens, co-working spaces, business infrastructure like broadband and EV charging points); community-owned shops (e.g. provision of premises); equipment to support the showcasing of local food and drink products such as regional information display boards																		
Intervention	Capital grants for the development and promotion (both trade and consumer) of the visitor economy	→		→	→	→				→	→	→	→	→					
Footnote	Including local attractions, trails, tourism products more generally																		
UKSPF alignment	E17: Development and promotion of the visitor economy																		
Eligible projects	<ul style="list-style-type: none">Projects that look to link and utilise multiple assets and attractionsProjects that link outdoor activity to the landscape, conferring economic benefit to the area as a whole, as well as making a contribution to health and wellbeingProjects that extend the shoulder season and support experiential tourismProjects that reflect the importance of quality local food and drink and the part it can play in creating employment, tourism and evolving the area's identity	Can be used to deliver this output →				Can be used to deliver this output →	Can be used to deliver this output →			Can be used to deliver this outcome →	Can be used to deliver this outcome →	Can be used to deliver this outcome →					Can be used to deliver this outcome →		
Example expenditure	Development of local visitor trails and infrastructure (e.g. information boards and visitor centres); development of local tourist attractions and visitor experiences																		
Investment Priority	Supporting rural communities																		
Intervention	Capital grants for impactful volunteering and social action projects to develop social and human capital in local places							→	→	→								→	
Footnote	N/A																		
UKSPF alignment	E9: Impactful volunteering and/or social action projects																		
Eligible projects	<ul style="list-style-type: none">Projects that strengthen and improve the resilience and viability of community assets and infrastructureProjects that address community and business costs through innovative approachesProjects that support 'ageing population' issues where specified activity is backed by research, need and a sustainable business/delivery model							Can be used to deliver this output →	Can be used to deliver this output →	Can be used to deliver this output →								Can be used to deliver this outcome →	
Example expenditure	Purchase of equipment; improvements to premises to enable local volunteering groups such as youth charities, carers groups or refugee support groups																		

CABINET

URN: 23-063

Report Title: STAR Survey Action Plan

Report to: ELT / Cabinet

Date of meeting 13 September 2023 / 9 October 2023

Responsible Cabinet Member: Cllr Graham Plant

Responsible Director/Officer: Nicola Turner, Head of Housing Assets

Is this a Key decision? No

Date added to Forward Plan of Key Decisions if a Key Decision: N/A



EXECUTIVE SUMMARY / INTRODUCTION FROM CABINET MEMBER

This report details the outcome of the Survey of Tenants and Residents (STAR Survey) undertaken by the Council in December 2022 and January 2023. Reflecting the introduction of new Tenant Satisfaction Measures by the Regulator of Social Housing which the Council must collect this year, the survey provides a useful benchmark of tenant and leaseholders perception of the Housing Assets Service. An action plan has been developed to address those areas where improvement is required.

RECOMMENDATIONS:

That Cabinet:

- 1) Note the report and action plan.

1 Introduction

- 1.1 The Council last carried out a perception Survey of Tenants and Residents also known as a STAR survey in 2019. The survey was used to support service improvements. A new survey was commissioned in 2022 and survey work was undertaken in December 2022 and January 2023, the formal report was received in March 2023. As the Regulator of Social Housing has introduced Tenant Satisfaction Measures (TSM) for 2023/24 which include 12 qualitative questions, the STAR survey was used as an opportunity to benchmark the Council's performance as a landlord in relation to the TSMs. Whilst this is the first year that landlords are required to collect TSM information, it will not be required to report the TSM until the summer of 2024

reflecting performance in 2023/24. Tenants will be able to review the TSM scores for their landlord as well as other Registered Provider landlords as the Regulator of Social Housing will publish all TSM information. The regulator will use the TSMs to understand landlord's performance as part of the new pro-active regulatory regime starting in April 2024 which will see landlords being inspected by the regulator.

- 1.2 The survey was a paper survey which was sent to all Council tenants and leaseholders, with separate reports received for tenants and leaseholders.

2. STAR Survey Results - Tenants

- 1.3 The tenant survey had 30 questions including the 12 TSM questions. Overall, 1,681 tenants responded to the survey with a 24% response rate from general need tenants and 52% response rate from sheltered housing tenants. The survey is able to be broken down by property type, ward and tenant age and disability status which allows us to identify the different levels of satisfaction across the tenant population. An open question in the survey asked what the Council could do better, this question provided a wide range of answers and feedback in relation to the Council's landlord service.

- 2.1 The table below provides a summary of the results of the survey for tenants against each of the twelve TSM qualitative questions.

TSM Question	Tenant Satisfaction Scores
TP01: Overall satisfaction	80%
TP02: Satisfaction with repairs	79%
TP03: Satisfaction with time taken to complete most recent repair	77%
TP04: Satisfaction that the home is well maintained	77%
TP05: Satisfaction that the home is safe	80%
TP06: Satisfaction that the landlord listens to tenant views and acts upon them	59%
TP07: Satisfaction that the landlord keeps tenants informed about things that matter to them	66%
TP08: Agreement that the landlord treats tenants fairly and with respect	77%
TP09: Satisfaction with the landlord's approach to handling of complaints	42%
TP10: Satisfaction that the landlord keeps communal areas clean, safe and well maintained	78%
TP11: Satisfaction that the landlord makes a positive contribution to neighbourhoods	68%
TP12: Satisfaction with the landlord's approach to handling of anti-social behaviour	67%

- 2.2 Due to the use of the TSM questions in the recent survey, it is not possible to provide a direct comparison against all scores between the 2019 and most recent STAR surveys, however, the table below captures the key result areas from the 2019 survey and compares them to the current TSM questions and scores. It is noted that there is a reduction in satisfaction across all areas when taken as a whole other than in relation to repairs and maintenance.




2019 Measure	2019 Score	Current Score	2023 Measure
Overall Satisfaction	83%	80%	Overall Satisfaction
Quality of the home	84%	77%	Home is well maintained
Neighbourhood as a place to live	85%	68%	Landlord makes a positive contribution to neighbourhoods
		78%	Communal areas are clean, safe and well maintained
Repairs and Maintenance	77%	79%	Satisfaction with repairs
		80%	Satisfaction that the home is safe
Listens to views and acts upon them	65%	59%	Landlord listens to tenant views and acts upon them


- 2.3 Appendix A provides a comparison of the Council's scores against other landlords in terms of the median and upper quartile scores utilising House Mark benchmarking data. This shows that in some areas, despite the reduction in scores from 2019 to 2023, the Council is still achieving scores which are above median and in relation to satisfaction that communal areas are clean and well maintained the score is in the upper quartile. The score on satisfaction that the landlord keeps tenants informed about things which matter to them was in the lower quartile.
- 2.4 An analysis has been undertaken of the comments made by respondents to the survey which identified that the Council's landlord service is not meeting tenant expectations in relation to the following areas:
- Communication and informing tenants about what we are doing (in general and applied to any process)
 - How we maintain communal areas on a regular basis including cyclical maintenance (poor upkeep)
 - How we show that we are keeping tenants safe in their homes and managing safety in communal areas
 - Being better at treating tenants fairly and with respect

- How we engage and work alongside tenants to improve services and have more say in tailoring services to what tenants aspire to
- The process around addressing dissatisfaction and managing complaints
- The perception/fear of anti-social behaviour and how we manage it
- The experience when tenants report damp and mould
- The day-to-day repairs process and overall tenant experience
- The process and communication from inspection to delivery of repairs
- How we communicate better between service areas
- The service standards for the service need to be clear
- The quality of fixtures and fittings used.

3 STAR Survey Leaseholders

- 3.1 The leasehold survey had 22 questions including an open question which asked what the Council could do better, this question provided a wide range of answers and feedback in relation to the Council's landlord service. It is noted that the TSM do not apply to leaseholders, however the STAR survey included the relevant TSM qualitative questions to allow comparison of leaseholder and tenant perceptions of the service.
- 3.2 84 leaseholder survey forms were completed representing a 24% response rate. The table below summaries the results from leaseholders and it is noted that overall, their level of satisfaction is lower than for tenants. The arrows next to the score show the direction of travel from the 2019 survey where comparison is possible.

TSM Question	Tenant Satisfaction Scores
TP01: Overall satisfaction	55% 
TP02: Satisfaction with repairs	Not Applicable
TP03: Satisfaction with time taken to complete most recent repair	Not Applicable
TP04: Satisfaction that the home is well maintained	Not Applicable
TP05: Satisfaction that the home is safe	59%
TP06: Satisfaction that the landlord listens to tenant views and acts upon them	33% 
TP07: Satisfaction that the landlord keeps tenants informed about things that matter to them	49%
TP08: Agreement that the landlord treats tenants fairly and with respect	53% 

TP09: Satisfaction with the landlord's approach to handling of complaints	32% 
TP10: Satisfaction that the landlord keeps communal areas clean, safe and well maintained	57%
TP11: Satisfaction that the landlord makes a positive contribution to neighbourhoods	50%
TP12: Satisfaction with the landlord's approach to handling of anti-social behaviour	37%

3.2 An analysis of the comments made by respondents to the survey identified the following key themes:

- Need to provide more information on how service charges are calculated – increasing transparency of charging
- External area cleaning and maintenance
- Communication in response to repairs and other queries.
- Listening to views and acting on them.

4.0 STAR Survey Action Plan

4.1 An action plan has been developed to reflect the themes identified from the STAR Survey report and using an analysis of the comments made by respondents to improve the Council's performance in those areas where the scores show tenant and leaseholder scores for satisfaction with the service are weakest. The aim of the action plan is for the TSM scores for 2023/4 to show improvement with all scores below the median to achieve the median and for all scores below the upper quartile to increase to the upper quartile. Over the next few years the focus will be for all 12 TSM scores to be in the upper quartile.

4.2 The action plan is a joint action plan with Great Yarmouth Norse (GYN) reflecting the fact that for many tenants, GYN will be their primary interaction with the Council's landlord services. The action plan will be monitored six monthly with progress reported to ELT. A copy of the Action Plan is attached at Appendix B.

5.0 Financial Implications

5.1 There are no financial implications associated with this report. Any financial implications related to individual actions will be managed through existing budget monitoring and approval processes. The main cost is officer time.

6.0 Risk Implications

6.1 There are no risk implications associated with this report. The results of the STAR survey, however, show a number of areas where the Council must make

improvements to the way it delivers the landlord services to increase satisfaction with the service and in particular how the Council listens to and acts on the views of tenants and in relation to complaint handling. The action plan sets out to strengthen the service in these areas. There are risks associated with not implementing the actions within the STAR action plan in relation to the TSM showing declining levels of tenant and leaseholder satisfaction with the Council's service which could trigger an earlier inspection of the Council's landlord service by the Regulator of Social Housing.

7.0 Legal Implications

7.1 There are no legal implications associated with the report.

Background papers

STAR 2019: General Needs and Sheltered Tenants

Tenant Satisfaction Survey 2023: General Needs and Sheltered Tenants

Tenant Satisfaction Survey 2023: Leaseholders

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

Consultations	Comment
Monitoring Officer Consultation:	Pre-circulated for comment
Section 151 Officer Consultation:	Pre-circulated for comment
Existing Council Policies:	N/A
Equality Issues/EQIA assessment:	None associated with the report. However, in delivering landlord services the Council reflects the needs of individuals with protected characteristics.

Figure 1: Satisfaction with TSMs (Your score) compared to January 2023 HouseMark data (Quartiles 1-4)



STAR ACTION PLAN 2023

STAR/TSM Measure	Area for improvement	Action	Required Outcome	Lead Officer	Timescale for Completion
TP01: Overall Satisfaction	Tenants and leaseholders do not always know that their emails and written communications have been received.	Introduce a standard automated response for all emails sent to shared emails to confirm receipt and timescale for a response (reflecting Council Customer Charter). Ensure all letters have a holding response to confirm receipt and timescale for full response if an immediate response cannot be provided.	Tenants and leaseholders have confidence that correspondence has been received and is being actioned.	Head of Housing Assets	01-Nov-23
	There are differing levels of satisfaction with services and it is not fully understood how these differences relate to demographics, tenure and property location.	Review the STAR survey to understand the differences in satisfaction levels and refine the action plan once complete to ensure that actions can be undertaken to address lower areas of satisfaction.	There are less variances in satisfaction across tenants and leaseholders reflecting a clearer understanding of the needs of tenants and leaseholders and all groups are aware of the Council's service standards.	Head of Housing Assets	04-Dec-23
	Tenants and leaseholders do not always consider that they are kept informed of progress in resolving queries or enquiries.	Introduce a regular feedback approach when resolution of queries/answering of queries cannot be achieved within 5 working days, with a Single Point of Contact being responsible for keeping the tenant up to date on actions and timescales.	Tenants and leaseholders have confidence that issues, queries and enquiries are being actioned and are aware of timescales for resolution.	Head of Housing Assets	04-Dec-23
TP02: Satisfaction with repairs	Tenants are not always satisfied with the quality of repairs	Develop and adopt a new Housing Repairs Policy, so tenants are clear on what repairs the Council will undertake and the timescale for repairs.	Clearer understanding by tenants of what repairs the Council will and will not do. More consistency in approach to repairs delivery.	M Burns	Cabinet consideration of policy on 9 October 2023
		Introduce a new post inspection regime to inspect a sample of repair works when complete to ensure quality and value for money of the repairs service.	The Council is randomly checking the quality of and resolution of repair issues in the tenant's homes and across estates.	Housing Asset Manager	08-Jan-24
		Carry out a regular review of properties where more than 10 repairs per annum are requested to identify and remedy root cause of high repair demand.	To ensure that repairs can be completed first time to the required standard, to reduce the impact on tenants and ensure better value for money of the repairs service.	Housing Asset Manager and GYN Operations Director	01-Nov-23
TP03: Satisfaction with time taken to complete most recent repair	In some cases, repairs take too long to complete, or when follow up works are required, tenants are not aware repairs will be completed.	Introduction of "first available appointment" for routine repairs, ensuring that tenants are offered more choice on appointment times.	Where further works are required, a new appointment is made for completion of the works.	GYN Operations Director	01-Nov-23
		Ensure that where an inspection of the home is required, tenants are advised of the timescale for inspection. All works required are discussed with tenant and timescales for works communicated.	Tenants are clear on what works will be carried out to their home and the timescale for completion.	Housing Asset Manager and GYN Operations Director	04-Dec-23
TP04: Satisfaction that the home is well maintained	Cyclical maintenance has not been undertaken for a number of years and many homes appear in poor condition due to peeling/poor paintwork.	Develop and publish a three year cyclical decorations programme. Target 2023/4 cyclical decoration works on the worst properties.	The visual appearance and quality of the Council's estates improves, ensuring tenants can see that properties are well maintained.	Housing Asset Manager	01-Apr-24
	Tenants and leaseholders do not know what capital works are planned for their homes until notified of imminent works.	Develop a three year capital programme, publish details of the programme and the areas of homes to be included in the programme.	Tenants and leaseholders are aware what works the Council is undertaking to the housing stock and when they will happen. There is clear understanding of the level of investment in Council homes.	Housing Asset Manager	01-Apr-24
		Ensure tenants and leaseholders are notified at the start of each year if their home is to receive capital improvement works.	Tenants and leaseholders have early notification of capital works to be undertaken in their home.	Housing Asset Manager	01-Apr-24
	Tenants and leaseholders are not always satisfied that works required to their homes/their estates are completed.	Carry out a review of all outstanding repairs as part of the monthly GYN/GYBC Operational Meetings to identify timescales for completion of works/works where no further action is required and trends.	The number of repairs (including compliance works) not completed within target time is reduced, trends in why some repairs are not completed are identified and appropriate action is taken. Overall, more repairs are completed on time.	Housing Asset Manager, GYN Operations Director and Corporate Health and Safety Manager	01-Nov-23
TP05: Satisfaction that the home is safe	Not all tenants are satisfied that the Council's homes are safe.	Update tenants on the progress which has been made in ensuring Council homes are safe following the Regulatory Notice issued in October 2022.	Tenants have confidence that prior issues with compliance checks on Council homes are being remedied and homes are safe.	Corporate Health and Safety Manager	30-Nov-23
		Ensure there is a full suite of policies which set out the Council's approach to compliance and protecting the health and safety of tenants.	There are clear policies underpinned by processes which ensure that Council homes are safe. Staff are aware of requirements to address issues which impact safety in flatted homes.	Corporate Health and Safety Manager	01-Apr-24
		Update tenants on the outcome of the stock condition survey and what it shows re the standard and safety of homes, along with details of how the survey is informing the capital programme.	Tenants are aware of the stock condition survey has been used to focus the future capital programme and ensure homes are safe and well maintained.	Housing Asset Manager	01-Apr-24

TP06: Satisfaction that the landlord listens to views and acts upon them	Not all tenants are satisfied that as a landlord, the Council listens to their views and uses their feedback to improve services.	At least annually, the outcome of tenant and leaseholder satisfaction surveys (including the Tenant Satisfaction Measures) are shared with tenants and leaseholders. Feedback clearly states how the views shared with tenants have been acted on and any service changes which have been made as a consequence of tenant feedback.	Tenants understand how their feedback has shaped service delivery and made a difference.	Head of Housing Assets/Resident Engagement Officer	01-Apr-24
		Review the Resident Engagement Strategy and approach to engagement following the publication of the revised Regulator of Social Housing Consumer Standards and new Code of Practice. To include consideration of introduction of a new Tenant Engagement Panel and how tenant representation can inform delivery and working groups across the Housing Assets Service.	The Resident Engagement Strategy maximises opportunity to ensure that the views of tenants and leaseholders is strongly influencing strategy and policy development as well as service delivery. The Council is able to evidence how the voice of tenants is heard and used.	Head of Housing Assets/Resident Engagement Officer	01-May-24
		Review the Sheltered Housing Service contact options for tenants to ensure they reflect the needs of sheltered housing tenants.	The delivery of the Sheltered Housing Service reflects the needs of the tenants that use it, providing a flexible and adaptive approach to maintaining contact and support plan delivery.	Tenancy Services Manager	01-Nov-23
		Ensure all staff understand their role in feeding back tenant views on the services the Council provides.	All options for capturing feedback from tenants are used to enhance understanding of tenants experience of the Housing Assets Service and to ensure those views can inform service delivery.	Head of Housing Assets	04-Dec-23
TP07: Satisfaction that the landlord keeps tenants informed of things that matter to them	Tenants do not always feel that they know what is happening to their home/area or changes which affect their tenancy or the Council housing stock more widely.	Increase proactive information sharing with tenants and leaseholders to include: 1. Reviewing how we keep tenants informed about repairs and other service requests 2. Increasing awareness of campaigns the council is running - such as estate walks, ASB week, Damp and Mould 3. Capital programme and cyclical decorations programme (see actions above) Sharing of the Resident Engagement Calendar with tenants and residents	Tenants and leaseholders have more awareness of what is happening across the Housing Assets Service, their local area and what is proposed for their home.	Head of Housing Assets	01-Apr-24
		Develop a new Housing Customer Charter setting out the council's approach to service delivery and resident engagement. To include resident engagement in development of Charter. Charter to support and compliment the Resident Engagement Strategy.	Tenants actively support the development of a Customer Charter setting out the Council's service standards as well as the approach to and support (including financial) for resident engagement and ensuring they are informed in a timely way about things which matter to them.	Head of Housing Assets	08-Jan-24
		Review the approach to Service Charge billing for leaseholders to ensure that the basis of costs are clearer reflecting feedback from the STAR survey.	Leaseholders are clearer on the basis of service charges and how they are calculated with effect from the 2023/4 billing cycle in September 2024.	HRA Income Service Manager	30-Sep-24
TP08: Agreement that the landlord treats tenants fairly and with respect	Not all tenants consider that they are treated fairly or with respect	Ensure all staff, including GYN and sub contractors delivering repair and maintenance works are aware of the Council's Customer Charter.	All staff (directly or indirectly employed by the Council) understand the need for courtesy and respect when dealing with tenants and leaseholders. The Council's expectation of what good customer service looks like is clearly understood and met by all staff.	Head of Housing Assets	01-Nov-23
		Ensure that when a negative decision is communicated with a tenant or leaseholder, then the policy/legislative basis of that decision is clearly articulated to the tenant. Where there is a formal appeal process, this is explained.	Tenants and leaseholders understand the basis for decisions and that decision making is fair and consistent, especially when the decision is not the outcome wanted by the tenant/leaseholder	Head of Housing Assets	01-Nov-23
TP09: Satisfaction with the landlord's approach to handling of complaints	Complaint handling - complaints are not responded to or resolve the issue being complained about	Refresh training for all staff on complaints policy and what a complaint is.	Staff respond quickly to acknowledge and action complaints, tenants feel that complaints are dealt with positively.	Assets/Information Governance Lead	08-Jan-24
		Train managers on how to investigate and respond to complaints	More complaints are resolved at Stage 1, better outcomes for complainants and learning from complaints is captured and implemented.	Head of Housing Assets/Information Governance Lead	08-Jan-24
		Introduce satisfaction survey on complaint handling.	More tenants and leaseholders are satisfied with complaint handling. Issues raised with complaint handling are fed back to managers to support improvements in complaint handling.	Head of Housing Assets/Information Governance Lead	31-Dec-23
TP10: Satisfaction that the landlord keeps communal areas clean and well maintained	Not all tenants and leaseholders consider that communal areas are clean and well maintained.	Consider and consult tenants and leaseholders on introduction of grass cutting collection and indicative service cost charges to inform final decision. Outcome of decision communicated to tenants and leaseholders.	To involve tenants and leaseholders in a decision on whether to change the specification for grass cutting, reflecting negative feedback on grass cuttings being left on grassed areas.	Tenancy Services Manager	01-Apr-24
		Review communal bin provision to identify how can improve accessibility of communal bins for residents with vulnerabilities, trial approach in sheltered housing and assess outcome.	Address options and costs of ensuring all communal bins can be used by all residents irrespective of vulnerabilities or disabilities.	Tenancy Services Manager	01-Mar-24
TP11: Satisfaction that the landlord makes a positive contribution to neighbourhoods	Not all tenants consider that the Council makes a positive contribution to neighbourhoods.	Promote the work undertaken by the Council on ensuring neighbourhoods are well managed, maintained and to ensure residents are aware of local services.	Tenants and leaseholders are aware of the Council's commitment to ensuring that neighbourhoods are well maintained and well managed areas.	Head of Housing Assets	01-Feb-24

TP12: Satisfaction with the landlord's approach to handling Anti-Social Behaviour	Not all tenants and leaseholders are satisfied with the Council's approach to handling and resolving Anti-Social Behaviour (ASB)	Use feedback from the ASB survey to understand those areas where complainants are less satisfied with the response to ASB and to develop a specific action plan to support continuous improvement in this area.	More complainants are satisfied with the handling of their ASB complaint.	Tenancy Services Manager	01-Nov-23
		Develop a leaflet to define ASB and the actions the Council will take to address ASB working collaboratively with complainants and partners to be shared with complainants when a complaint is made. The leaflet to articulate when the Council can/cannot take formal actions. Tenants and leaseholds are engaged in the development of the leaflet.	Complainants are clearer on what constitutes ASB, what actions the Council can undertake to address ASB and the role of complainants in evidencing ASB to allow effective resolution of issues.	Tenancy Services Manager	04-Dec-23
		Improve evidence gathering evaluating the use of deployable CCTV (overt) to capture evidence to support effective action in relation to ASB including environmental crime.	More effective resolution of ASB and environment crime through increasing the ability to secure high quality evidence which allows effective ASB resolution and actions.	Tenancy Services Manager	03-Jun-24



URN: 23-140

Report Title: Adoption of Repairs Policy

Report to: ELT/Cabinet

Date of meeting: 6 September 2023 / 9 October 2023

**Responsible Director / Officer: Chris Furlong, Executive Director – Property & Housing Assets,
Mark Burns, Consultant**

Responsible Cabinet Member: Cllr Graham Plant

Is this a Key decision? Yes

Date added to Forward Plan of Key Decisions if a Key Decision: 23 August 2023

EXECUTIVE SUMMARY / INTRODUCTION

The Council has a duty to repair and maintain its 5776 council homes and as a social landlord meet the Regulator's Consumer Standards.

This report sets out a new council Housing Repairs Policy for adoption.

RECOMMENDATION:

That Cabinet approve the adoption of the Housing Repairs Policy

1. Introduction

- 1.1 This report seeks Cabinet's agreement for the adoption of a new council Housing Repairs Policy. The report outlines the purpose of the Policy, how it was developed, its objectives and the key problems it is addressing, and the Policy's main features. The Policy is the first of a group of overarching Housing Asset Service related policies coming to Cabinet.

2. Housing Repairs Policy Purpose

- 2.2 The purpose of the Policy is to provide an excellent, cost-effective repairs and maintenance service for council tenants that is responsive to tenants needs, meets regulatory requirements, and supports the Council's Housing Investment Plan.

3. Policy Development

- 3.1 The Policy has been developed by an internal working group of relevant managers and officers, who agreed a draft Policy which was then considered by a tenant focus

group, and their feedback and suggestions were incorporated into the Policy, including:

Tenant Focus Group Feedback	Included in Policy
Visits being aborted, due to not having the right part.	Introduction of a diagnostic tool called 'Repair Finder', which will enable call centre staff to more accurately diagnose the repair and trade required to complete it.
Aborting visits where the job order does not match what the operative finds.	As above and where additional repairs work is discovered that cannot be fixed first time, trades staff will also call from site and request appointment availability for the customer.
Not keeping communication going sufficiently when there are delays to repairs.	When an appointment is booked, we will ensure the tenant receives a message confirming the repair. A further reminder will be sent the day before the repair is due to be completed and a further message will also be sent when the tradesman is enroute to the property on the day of the repair.
Ensure staff can appropriately identify vulnerable tenants.	We encourage tenants to let us know about any support needs and vulnerability they have when a repair is reported, so that we can prioritise it correctly and we will hold this information on our repairs management system accordance with the Council's GDPR and Data Protection policy.
Be clear on what tenants' responsibilities are and what they should not attempt	We have developed a detailed Tenant and Landlord Repairs and Maintenance responsibilities list.

4. Objectives

4.1 There has been a reduction in tenant's satisfaction with the quality of the Council's homes over the last few years with the STAR Survey scores for satisfaction with the Quality of the Home reducing from 84% to 74% between 2019 and 2022, satisfaction for speed of completion of a repair (repair completed in last 12 months) dropping from 80% to 77% between 2019 and 2022. The most recent STAR Survey however suggests there has been a small increase in satisfaction with repairs from 77% in 2019 to 79% in 2022. Compliance problems led to a breach of the Regulator for Social Housing's

Home Standard and a compliance improvement plan was put in place to address the issues identified.

- 4.2 The Housing Repairs Policy forms part of the Council's plans to improve performance and tenant satisfaction with the Repairs Service, as well as further strengthen the Council's housing compliance response, by ensuring repairs policy and practice is up-to-date, fit for purpose and clearly articulated to tenants, staff, and contractors.
- 4.3 In addition, the Council faces a challenging financial environment and has ambitious plans to improve its council housing over the next five to 30 years and is developing a Housing Investment Plan (HIP) to do this. Therefore, the Policy also contains measures to ensure it maximises Value for Money for its tenants and minimises unnecessary revenue expenditure thereby supporting the HIP.
- 4.4 To underpin these key objectives, the Policy mirrors Key Performance Indicators for the service which reflect the Regulator for Social Housing new repairs and maintenance related Tenant Satisfaction Measures.

5. Key Features

- 5.1 To ensure clarity for tenants, staff and contractors, the Housing Repairs Policy contains repairs definitions and target timescales as follows.
- Emergency Repairs - Any defect that puts the health, safety, or security of the tenant, or a third party, at immediate risk; or that adversely affects the structure of the building. Target timescale: Attend in 4 hours, completed within 24 hours.
 - Routine Repairs – A repair that can be deferred without serious discomfort, inconvenience, or nuisance to the tenant or a third party, or long-term deterioration of the building, and can await the next convenient maintenance visit. Target timescales: Completed within 28 days.
 - Planned Non-Urgent Repairs - A defect which requires the replacement rather than a repair of a component; these can be internal or external. Target timescales: Completed within 3 months.
- 5.2 The Policy also provides further clarity for tenants and staff, by comprehensively listing repairs that fall within each category in an appendix.
- 5.3 This has simplified the number of repairs categories reducing it from four to three and will simultaneously ensure emergency repairs are dealt with more effectively, but also that routine repairs overall can be managed more efficiently. To compliment this change, we recognise the best way to maximise tenant satisfaction with repairs, as well as get more work completed on the first visit, is to strive to offer tenants the first available appointment of their choice.

5.2 The recent STAR survey and tenant focus group also highlighted concerns about communication, so the Policy sets out a commitment to keep tenants informed utilising new repairs reporting systems.

5.3 The Council's practice around rechargeable repairs has also been unclear, leaving a vacuum that caused practice to drift into a default of not recharging for disrepair caused by tenants. Instead, the Council has tended to carry out most repairs, regardless of whether the tenant is liable, and bear the cost, rather than work with the tenant to prevent disrepair.

5.4 In addition, we are regularly experiencing voids where the cost of the remedial work is unusually high and often caused by the cost of house clearance, cleaning, and tenant damage. It is believed that this contributes to high average void costs which are currently approximately £4200 per void 30% above national averages of £3200.

5.5 The Policy clarifies that when a repair is not caused by fair wear and tear, then it should only be repaired if full payment is made by the tenant in advance. In exceptional circumstances, the repair can be completed first and then a recharge raised, for example if a genuine hardship exists, or the disrepair could cause or is causing damage to other parts of the property or to other properties. The Policy also confirms that in accordance with the Housing Allocation Scheme, in some instances transfers may also be suspended or disqualified if a tenant has caused significant damage and/or disrepair by their actions or neglect.

5.6 It should also be noted that the Policy supports a wider review of recharges currently being carried out, where the introduction of a new IT system allows the opportunity to review our wider recharge policy and processes, so tenants are clear on what the requirements are.

5.7 There are also several actions arising from this Policy that will ensure it is fully implemented.

6. Next Steps

6.1 If agreed by Cabinet, the Policy will be recommended to Full Council for approval.

7. Financial Implications

7.1 There are no additional costs to this policy, but it is estimated average Voids costs could be reduced from an average of £4200 to approximately between £3200 and £3500, by the effective introduction of this policy. Further significant savings could be made from reducing ongoing repairs work that should be the tenant's responsibility.

8. Risk Implications

8.1 This Policy will support compliance improvement plans and help ensure no further Regulatory Breaches occur.

9. Legal Implications

The Policy confirms Secure Tenants Right to Repair and Right to Compensation for Improvements.

10. Conclusion

10.3 This report has set out a request for Cabinet to agree the adoption of a new council house Repairs Policy, outlined the purpose of the Policy, how it was developed, its objectives and the key problems it is addressing, and the Policy's main features.

11. Background Papers

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

Consultations	Comment
Monitoring Officer Consultation:	
Section 151 Officer Consultation:	
Existing Council Policies:	
Equality Issues/EQIA assessment:	



Housing Repairs Policy

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Introduction

The purpose of this Policy is to outline our approach to the repair and maintenance of our housing stock, enabling us to deliver the highest possible standards of housing for our tenants, maximising tenant satisfaction and fulfilling our legal and regulatory obligations as a social landlord.

Service vision

Our overall Housing Assets service vision is to deliver;

‘Council housing that exceeds ‘Decent Homes Standards’ requirements, meets housing need, is attractive and in demand, is affordable and sustainable’

Policy Statement and Objectives

We recognise that providing an excellent repairs and maintenance service that is responsive to tenants needs and offers a good standard of repair, is a key tenant priority. However, the service also needs to be cost effective, eliminating unnecessary spend and waste, to maximise funding for the capital works programme as set out in our Housing Investment Plan (HIP), for example, to support funding to ensure homes achieve the ‘Decent Homes Standard’ and to support the decarbonisation of housing stock.

Delivering a comprehensive, timely capital works programme, will also achieve more cost-effective component replacement, such as replacing windows, or kitchen units and reduce component failure. This in turn will minimise unnecessary and uneconomic repair work, freeing up more funding for the capital programme, thus creating a virtuous circle of capital investment and cost-effective repairs and maintenance.

To do this we will provide a 24-hour, 365 day per year responsive repairs service, as well as cyclical and planned maintenance programmes and our objectives will be to;

- Achieve top quartile performance for tenant satisfaction with the repairs service
- Become an exemplar in meeting our statutory and regulatory obligations for repairing and maintaining customers’ homes, including our Damp and Mould Policy
- Build the skills, capacity and resources to deliver a sustainable high level of service so that the service develops, attains and attracts a high-quality workforce
- Minimise unnecessary cost and waste in responsive repairs, achieving top quartile performance on repairs carried out first time
- Provide an accessible and accountable repairs and maintenance service that reflects GYBC’s commitment to equality and diversity
- Take any proportional extra steps required to support the needs of our most vulnerable customers

KPI's and Tenant Satisfaction

To ensure this policy encourages high standards of performance and raises tenant satisfaction with repairs, we monitor key performance indicators (KPIs), including repairs related key Tenant Satisfaction Measures required by the Regulator of Social Housing. We will also regularly review performance and targets, using the data to learn and improve the service. The repair service KPIs are set out below.

Tenant Satisfaction Measures	Current Performance	Target 2023/4	Target 2024/5	Target 2025/6
RP02: Repairs completed within target timescale	93% (GYN outturn 2022/3)	95%	96%	97%
TP02: Overall Satisfaction with the Repairs service	79% (STAR, 2022)	85%	86%	87%
TP03: Satisfaction with time taken to complete most recent repair	77% (STAR, 2022)	80%	83%	86%
TP04: Satisfaction that the home is well maintained	77% (STAR, 2022)	80%	83%	86%
TP05: Satisfaction that the home is safe	80% (STAR, 2022)	83%	85%	87%
BS01: Gas safety checks - percentage of homes that have had all the necessary gas safety checks.	100%	100%	100%	100%
BS02: Fire safety checks - percentage of homes in buildings that have had all the necessary fire risk assessments	100%	100%	100%	100%
BS03: Asbestos safety checks - % of homes in buildings that have had all the necessary asbestos management surveys or re-inspections	100%	100%	100%	100%
BS04: Water safety checks –	100%	100%	100%	100%

(Legionella) % of homes that have had all the necessary legionella risk assessments				
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Local Measures	Current Performance	Target 2023/24	Target 2024/5	Targe 20225/26
% of Repair Appointments Made and Kept	93% (GYN outturn 2022/3)	93%	94%	95%
% of Emergency Repairs Completed in Timescale	93% (GYN outturn 2022/3)	100%	100%	100%
% of Responsive Repairs Completed First Time	90% (GYN outturn 2022/3)	85%	90%	90%

Access to Homes

Under the terms of the tenancy agreement, we require reasonable access to homes to carry out works where necessary and we will work with tenants to agree a suitable time. Occasionally, where repairs or safety checks are required which could have a significant health and safety impact, when we have tried to arrange access but been unable to get entry to do checks or repairs, as a last resort, we may seek legal authorisation to gain entry.

Making An Appointment

We will always aim to offer the next available appointment that suits each individual tenant, and we endeavour to:

- provide a range of appointments at times to suit tenants
- confirm all appointments where possible
- keep all appointments, but where that's not possible we will keep tenants informed about any likely delay, or change
- advise if an appointment is not required, or if somebody needs to be at home when we visit.

Maintenance Inspectors

Some repairs require a surveyor to visit the property, for example, if the repair is difficult to diagnose remotely, or if there are multiple repairs, and in these instances the Council will send out a maintenance inspector to view the repair at the tenant's home. Again, we will offer this by appointment.

We will also carry out some post repair reviews, including inspections to ensure their quality is maintained at a high standard.

Changing, or Missing Appointments

If an appointment is missed, or needs to be re-scheduled, tenants should contact us to arrange another appointment for the repair to be completed. We will leave a calling card if no-one is in when we arrive and will normally make three attempts to gain entry to carry out the repair, or survey. Where we need to change an appointment for any reason, we will advise of any changes to an appointment and offer a suitable alternative time, if required, and if in the rare circumstances we miss the appointment, we will keep you informed and always try to reschedule it at your convenience.

Repairs Responsibilities

The repair and maintenance of GYBC's housing stock is a joint responsibility between landlord and tenant. As landlord, we are responsible for most repairs and tenants are responsible for reporting them, as well as undertaking repairs that are their responsibility. For a breakdown of the repairs that the Council and tenants are responsible for, please see the Tenant's Handbook, or Appendix A.

The Council will carry out some repairs which are the responsibility of the tenant and recharge the tenant for the cost of the works. For further information please see the Rechargeable Repairs section of this document.

Responsive Repairs Definitions and Timescales

Responsive repairs are defined as those repairs which are carried out on a responsive basis, as the need arises. Some repairs are more urgent than others, such as a burst water pipe needing urgent attention, compared to a dripping tap which is not an emergency repair. To enable us to prioritise repairs and carry them out in a timely manner, we have divided responsive repairs into three categories.

1. **Emergency Repairs** - Any defect that puts the health, safety or security of the tenant, or a third party, at immediate risk; or that adversely affects the structure of the building.

Target timescale: **Attend in 4 hours, completed within 24 hours**

2. **Routine Repairs** – A repair that can be deferred without serious discomfort, inconvenience or nuisance to the tenant or a third party, or long-term deterioration of the building, and can await the next convenient maintenance visit.

Target timescales: **Completed within 28 days**

3. **Planned Non-Urgent Repairs:** A defect which requires the replacement rather than a repair of a component; these can be internal or external.

Target timescales: **Completed within 3 months**

(For a list of common repairs under each category please see Appendix B)

First Available Appointment

Regardless of the target timescale, we recognise the best way to maximise tenant satisfaction with repairs, as well as get more work completed on the first visit, is to strive to offer tenants an appointment of their choice.

Fix First Time

To maximise tenant satisfaction and minimise unnecessary waste and cost, we will aim to successfully complete repairs on the first attempt as often as possible.

In addition, to ensure we can fix repairs on the first visit as often as possible, we will introduce the use of a diagnostic tool called Repair Finder, which will enable call centre staff to more accurately diagnose the repair and trade required to complete it. Where additional repairs work is discovered that cannot be fixed first time, trades staff will also call from site and request appointment availability for the customer.

Some routine repairs may be prioritised for earlier completion where there is a Right to Repair, such as leaking roof, door entry phone not working, or mechanical extractor fan.

Communication

When an appointment is booked, we will ensure the tenant receives a message confirming the repair. A further reminder will be sent the day before the repair is due to be completed and a further message will also be sent when the tradesman is enroute to the property on the day of the repair.

Our repairs reporting system will alert repairs staff to any delays, or issues during the working day so that they can communicate with tenants to keep them informed via their chosen communication method.

If a repair appointment is moved for any reason, a message will be sent confirming this and the communication process will remain as stated above.

Vulnerable Tenants

We recognise that some of our tenants are vulnerable and experience difficulties with everyday living and/or may require additional support to ensure they can safely occupy their homes. In relation to repairs, this could include giving extra priority and we will assess a tenant's vulnerability in line with our Vulnerability Policy.

We encourage tenants to let us know about any support needs and vulnerability they have when a repair is reported, so that we can prioritise it correctly and we will hold this information on our repairs management system in accordance with the Council's GDPR and Data Protection policy.

We will ensure our call centre staff are suitably trained and can make decisions to ensure risks are evaluated appropriately.

Staff and contractors may be able to assist in moving heavy or awkward items prior to work commencing, however, no liability will be accepted for any accidental damage caused and arrangements will need to be agreed in advance, where possible.

The nature of support we provide will depend on the level of vulnerability and the household's circumstance.

Handy Person Service

We would like to offer a handyperson service to vulnerable tenants for small jobs which may be difficult for them to complete themselves, e.g. hanging curtain rails, building flat packed furniture, or putting up a shelf and we will be exploring the viability of this initiative during 2023.

Planned Maintenance

Planned Maintenance is defined as works carried out when the building components have reached the end of their expected lifespan. This includes kitchen, bathroom, windows, roofs, and boiler replacements. These works are determined by the age and condition of the component and are normally planned in advance and are carried out as part of contracts covering a number of homes.

Our planned investment is developed from our stock condition database, including information on construction dates, component life cycles, actual condition (based on individual inspections rather than lifecycle) and customer feedback. We will regularly assess the condition of our housing stock and have developed Property Asset and Data Standards to ensure decisions are reached on up-to-date, accurate data.

A detailed five-year maintenance programme will be produced and published via the Council's website.

Repair/Replace Policy

The Council will normally carry out a responsive repair by fixing the existing component and only replace components as part of its planned programme. However, it may sometimes replace rather than repair a component outside of a planned contract, where it has failed and is beyond economical repair. Our decision-making in these circumstances will take into account:

- The cost of repairing the component
- How long that repair is expected to last
- The cost of replacing the component
- The timescale for replacement of the component under the planned programme

If a component is replaced, whilst we will try to meet a similar specification to the one being replaced, where we cannot, it will be a council approved component.

Cyclical Maintenance, Servicing and Compliance checks

Cyclical Maintenance is defined as work which is undertaken on an arranged cycle to help maintain the property in good order. In addition, the Council undertakes annual gas boiler servicing as well as regular electrical testing, asbestos and water hygiene checks and lift servicing (compliance checks).

We will undertake the cyclical maintenance of components, servicing and compliance checks in accordance with current legislation, Health & Safety guidelines and other appropriate industry legislative standards.

We will service all gas appliances for which we are responsible within statutory regulations and requirements. The service will include safety checks and will be in accordance with all current gas regulations. We will, if necessary, take appropriate enforcement action against tenants who do not co-operate in providing access for compliance checks to be undertaken. Enforcement action to gain access to a home will only be used as a last resort and we will work with tenants to arrange suitable access to their home for such checks. Compliance checks support the safety of the tenant, their household and neighbours.

We will also maintain and service specialist installations such as lifts, fire alarm systems, council provided smoke and carbon monoxide detectors, fire extinguishers, warden call systems, door entry systems or any other items considered necessary, on a regular basis as demanded by statutory responsibility or manufacturer's recommendations. All services will include health and safety checks. Where possible we will try to coordinate our activities to minimise inconvenience to tenants, such as carrying out boiler, smoke alarm and CO detector planned maintenance in one visit.

Cyclical maintenance works includes works like external painting and cleaning guttering. We will redecorate our properties externally on a regular basis. Prior to redecoration, all previously painted components will be surveyed, and any found to be defective will be repaired or renewed. We will also decorate the communal areas on a regular basis. Where tenants wish to decorate parts, or the whole of their home externally, permission must be sought in advance. Where possible we will also incorporate improvements identified by tenants and leaseholders.

Quality Standard Principles

We want any repair to be fit for purpose, value for money and good quality, so that it lasts for the remaining lifetime of the component it relates to and avoids unnecessary repeat work or inconvenience for tenants. In every case we will ensure the repair is of a high standard, meeting the requirements of this policy.

Standardisation and Choice

To offer the high standards of quality set out in this policy, but also ensure our future planned and responsive maintenance work is cost effective, where possible, we want to only use standard components approved by the Council. This will enable contractors to plan and ensure they have an adequate supply of any components needed, avoiding unnecessary delays and successfully completing repairs on the first attempt. We will also endeavour to offer some choice in future programmed work. This will take time however, to implement.

Respecting Each Other

Our employees, and contractors, will be respectful, polite, and helpful at all times. They will also show visible photo identification before entering a tenant's home and will explain what work will be carried out and discuss this with the tenant.

We will try to take care of all tenant's belongings whilst working in their home, protecting them from damage and dust. To assist this, customers are expected to clear the area of any belongings or valuable items prior to work commencing.

Employees and our contractors will work safely in and around the customer's home, ensuring materials and tools do not cause any hazards to occupants. Rubbish and mess will be kept to a minimum and removed at the end of each day.

Where services such as electricity, water and gas will be disrupted, the tenant will be informed how long they will be affected, and every effort will be made to reinstate services before the end of the day. We will advise tenants where this is not possible and reasonable alternative arrangements will be made.

We will not tolerate any abuse, or inappropriate behaviour towards our staff or contractors, by tenants, their household, or their visitors. All tenants are expected to treat staff with respect and dignity. This means that tenants, their household and/or their visitors must refrain from behaving in a way that is aggressive, threatening, abusive or insulting. Nor must they engage in any behaviour, intentional or otherwise, that constitutes harassment or discrimination. We will take reasonable action to protect staff from such behaviour where appropriate.

Voids/New Lets

The approach to the management of the void process, including disrepair, recharges and letting standards is dealt with in accordance with the Council's Void Policy.

Right to Repair

The Secure Tenants of Local Housing Authorities (Right to Repair) Regulations 1994 sets out a secure tenants' right to carry out some qualifying repairs if the Council does not complete them within timescales set out in the legislation.

If a qualifying repair cannot be completed within prescribed timescales, the tenant has the right to request the Council to instruct a second contractor to complete the work. Where the second attempt, or second contractor also fails to complete the work within the agreed time, we will pay compensation to the tenant as set out in the legislation.

For more details on the Right to Repair legislation please see Appendix C

Tenant Alterations

Tenants at times will naturally want to improve, or alter, their Council dwelling and indeed they have the right to make certain improvements. In accordance with our Tenant Improvement Policy some improvements cannot be carried out without our written consent and tenants must request permission in writing, by completing a Tenant Alteration and Property Improvement Application Form (Appendix D) and receive permission before commencing any work. Although we cannot unreasonably withhold permission, tenants may be asked to remove any unauthorised alterations to a property at their own cost and put it back to the Council's standard. The tenant making the alteration will be responsible for the repairs and maintenance of these items whilst they remain the tenant, or if they moved into the dwelling where the alteration has been carried out, by mutual exchange.

A secure tenant of a local authority may have the right to be compensated for the improvements that they carry out to their property. The compensation is only paid for certain types of improvement and can only be claimed at the end of the tenancy. For further details please see Appendix E.

Rechargeable Repairs

During The Tenancy

In accordance with the Council's Rechargeable Repairs Policy, if a repair is caused by the natural use of a dwelling house by tenants and constitutes fair wear and tear and is the council's responsibility (see Appendix A) we will carry out any required repairs in line with our timescales without charge to the tenant.

However, the Council will charge residents for repair works carried out on their behalf where this expenditure has been caused by accidental, intentional, reckless, or careless damage, or neglect and thus is not the result of fair wear and tear.

Payment will normally be required in full before any re-chargeable repairs work is carried out, with the following exceptions where:

- an emergency response is required
- the property must be made secure at the direction of the Police where they have forced entry (costs will be recharged as appropriate to either the resident or the Police)
- the disrepair is prejudicial to the health and safety of the household (for example a blocked WC)
- the disrepair could cause or is causing damage to other parts of the property or to other properties
- the Council considers that the disrepair could lead to deterioration in the appearance of the area
- the Council is satisfied that genuine hardship exists

Where a repair is needed resulting from criminal activity that has not been caused by the tenant, a member of their household, or a visitor to their home, the resident will not be charged for the cost of any works providing written confirmation with a crime reference number is obtained from the Police.

At the End of the Tenancy

On receipt of a valid notice to end a tenancy, arrangements will be made with the tenant for the property to be inspected by a maintenance inspector, prior to the tenancy ending, to ensure it meets the expected standard set out in the tenancy conditions. The tenant will be advised at this stage of any repairs that they are likely to be recharged for unless rectified before the tenancy ends. However, some repairs for which the tenant is responsible may occur after the end of tenancy inspection has taken place or are not detectable until the dwelling is empty because of the nature of the repair, or for example, because of the presence of the tenant's furniture.

Any rechargeable works not carried out by the tenant before they vacate the property will be undertaken by the Council and the cost of the works will be recharged to the former tenant. A breakdown of the recharge work will be provided.

A situation may arise where an end of tenancy inspection is not able to be carried out in the presence of the tenant, for instance where the property has been abandoned. In these circumstances an empty property inspection will take place and a photographic record will be taken of any damage caused or work required to the property which is deemed to be the former resident's responsibility.

We will pursue any rechargeable repairs in accordance with the Council's Rent and other income collection policy, as well as our Rechargeable Repairs Policy.

Transfers To Other Social Housing

We know that tenants naturally sometimes require a move to another property, and we will process any transfer application in accordance with our Housing Allocation Scheme.

However, it is the tenant's responsibility to ensure there are no rechargeable repairs left at the time they vacate their home. Where a tenant has applied for a transfer, a maintenance inspector will visit the home to inspect the condition of the property. Tenants will be notified of any rechargeable repairs they are required to rectify, as well as the timescale to do so. Where a tenant has caused significant damage and/or disrepair by their actions or neglect, then this may lead to tenancy enforcement action being commenced and in accordance with the Housing Allocation Scheme, in some instances, an application for a move could be suspended, or disqualified.

Value for Money

Value for money is a key component of any Repairs and Maintenance Policy. The national context of rising costs means that there is a need to make the best use of all capital and revenue funding to ensure that we deliver the best quality service. There is also a clear link between a high-quality service and one that is efficient through removing or reducing service failures, inefficiencies, duplication, and waste. Our Housing Investment Plan also sets out several objectives to drive efficiency and value for money and allow those savings to be re-invested into the service.

Appendix A

Tenant and Landlord Responsibilities

You are responsible for some repairs in your home.

Great Yarmouth Borough Council is responsible for repairing key parts of your home and looking after the structure of any communal buildings and communal areas, however you are also responsible for some repairs in your home and we have set out the most common examples as guidance below.

For further queries please contact us on 0808 264 444, or e-mail gynrepairs@ncsgrp.co.uk. If possible, please ring to report a repair, so a convenient appointment can be made for the repair or inspection.

Ensure you're insured: Whilst we take out buildings insurance to cover the buildings we own and manage, please be aware that you are responsible for your belongings and making sure you have sufficient home contents insurance. The Council offers contents insurance, please see [for more information](#), or contact the Rent Income Team on 01493 846726, or email rentincome@great-yarmouth.gov.uk

Overall

You are responsible for:

- ✓ Keeping your home clean and in good condition
- ✓ reporting repairs the council is responsible for as soon as you become aware of them
- ✓ keeping your garden tidy
- ✓ insuring your home possessions
- ✓ giving us access to your home to carry out repairs, or any other essential work
- ✓ all repairs to your own belongings
- ✓ redecorating e.g., painting and wallpaper
- ✓ repairing hairline cracks or fractures in plastering
- ✓ taking reasonable steps to prevent condensation and mould, such as ensuring properties are adequately heated and ventilated, and treating and cleaning mould as appropriate (if you are in any doubt please contact us to arrange a repairs inspection where our surveyor can assess the problem and take further action if necessary)
- ✓ reporting a crime reference when reporting repairs caused by vandalism e.g., smashed windows
- ✓ providing access for safety checks to include:
 - annual gas servicing (if gas heating system)
 - five year electric checks
 - Carbon Monoxide and Smoke Detector checks and servicing (carried out at same time as gas or other heating system service)
 - Air Source Heat Pump/Electric heating system check

Kitchen

What you are responsible for:

- ✓ keeping the kitchen in good condition
- ✓ replacing sink plugs
- ✓ connecting and repairing your own appliances, e.g., washing machines, cookers and other white goods (please ensure these are carried out by a competent person and for cookers an electrician/gas engineer is used)
- ✓ clearing blocked sinks (unless caused by a plumbing failure the Council is responsible for)
- ✓ rehanging a kitchen cupboard door where the damage is caused by you
- ✓ changing fluorescent light tubes and starters

We will:

- ✓ replace tap washers
- ✓ repair trip hazards or other damage to the kitchen flooring we have provided
- ✓ repair or replace detached or snapped unit hinges, drawer fronts, runners and backs where this is not caused by tenant damage/neglect
- ✓ repair or replace kitchen units, worktops and seals
- ✓ repair or replace sealant around your kitchen sink
- ✓ fix or replace extractor fans, pull cords and cooker ventilation hoods if installed by us
- ✓ repair electrical sockets and isolator switches
- ✓ fix and replace cupboard and drawer handles where these are not damaged by you/a member of your household or visitor
- ✓ tighten loose hinges, drawer fronts, runners and backs.

Bathroom and Toilet

What you are responsible for:

- ✓ keeping the bathroom and toilet in good and clean condition
- ✓ containing leaks and preventing water damage, reporting leaks promptly for repair
- ✓ clearing a blocked toilet, sink, bath and hand basin (unless caused by a plumbing failure the Council is responsible for)
- ✓ replacing the toilet seat lid and hinges
- ✓ replacing bath and sink plugs, chains
- ✓ descaling or replacing shower heads and hoses
- ✓ replacing accessories such as mirrors, rails/curtains, riser rods, toilet roll holders, towel rails and cabinets
- ✓ repairing or replacing the internal tidy dryer, located over bath
- ✓ repairing or replacing WC and bathroom door locks/bolts
- ✓ replacing light bulbs (non-sealed light fitting).

We will:

- ✓ attend to and repair leaks
- ✓ repair or replace basin and bath taps
- ✓ repair or replace showers that we have installed
- ✓ repair or replace toilet flushing mechanisms
- ✓ repair or replace shaver points
- ✓ repair or replace extractor fans and pull cords
- ✓ repair or replace leaking or dripping taps (including mixers) to wash hand basin, bath and sinks
- ✓ repair or replace sealant around bath, shower unit and wash basin
- ✓ repairing or replacing the bath panel, including side and end framing

- ✓ replacing light bulbs in sealed bathroom and toilet light fittings.

Heating and Water

You are responsible for:

- ✓ reporting a gas leak call the Gas Emergency Service on 0800 111 999. If you're a British Sign Language (BSL) user, you can use SignLive <https://signlive.co.uk/login/> to contact the National Gas Emergency Service free of charge
- ✓ contacting Anglian Water if you have problems with your water supply
- ✓ clearing drain and waste pipe blockages
- ✓ reporting problems with lateral drains and private and shared sewers to your water or sewage company.

We will:

- ✓ repair your heating system if it breaks down
- ✓ repair or replace radiators and storage heaters
- ✓ fix water leaks from your heating system and tanks
- ✓ fix leaking pipework
- ✓ repair or replace storage tanks and water cylinders
- ✓ clear soil and vent pipes in flats if needed
- ✓ repair or replace cracked or collapsed drains that are not the water or sewage company's responsibility.

Electrics

You are responsible for:

- ✓ replacing light bulbs and tubes in your own home
- ✓ resetting the electric fuse box (consumer unit) if tripped
- ✓ replacing TV aerials and satellite dish (unless you live in a flat and have a communal TV aerial)
- ✓ changing batteries in smoke alarms and carbon monoxide detectors where units are not sealed
- ✓ testing smoke and carbon monoxide alarms regularly
- ✓ your own appliances and testing that they're not causing other electrical problems
- ✓ reporting faults with utility meters to utility suppliers
- ✓ arranging for a qualified person to connect and repair your appliances.

We will:

- ✓ repair or replace mains, fuses and power plug sockets in your home
- ✓ repair or replace faulty light fittings and switches
- ✓ repair or replace extractor fans and pull cords
- ✓ repair or replace hard-wired door bells
- ✓ repair or replace hard-wired and battery smoke and carbon monoxide detectors
- ✓ repair electrical hazards such as exposed or sparking wires and system shortages
- ✓ repair communal TV aerials.

Doors and Windows

You are responsible for:

- ✓ keeping the doors and windows in good condition, and wiping away moisture
- ✓ heating and ventilating your home to prevent condensation

- ✓ arranging access to your home, if you are locked out or have lost your keys
- ✓ repairing or replacing door chains, door numbers and secondary locks
- ✓ keeping internal doors, handles and latches in good condition
- ✓ oiling catches and hinges
- ✓ replacing broken glass, where you caused the damage
- ✓ window cleaning
- ✓ weather strips to external doors and draught excluders
- ✓ maintaining doors, e.g., not installing spy holes, cat flaps or letter boxes without prior written consent.

We will:

- ✓ repair or replace unsecure external doors, frames and panels
- ✓ repair or replace fire doors due to wear and tear
- ✓ repair or replace windows.

Fabric of the building (including internal)

We will:

- ✓ repair large cracks and severely crumbling surfaces
- ✓ repair penetrative and rising damp
- ✓ Identify causes of mould and remedial actions
- ✓ complete major structural repairs
- ✓ repair or replace internal doors (where these are not damaged by you/a member of your household or visitor)
- ✓ repair handrails and banisters for stairs.
- ✓ repair or replace roofs, chimneys, guttering and downpipes
- ✓ Decorate external parts of your home, such as the soffits and fascias on a regular basis.

Gardens

You are responsible for:

- ✓ keeping your garden tidy and carrying out any tree works in your garden
- ✓ weeding paths, paving and driveways
- ✓ maintaining, repairing and replacing garden fences you have erected wherever they are on the boundary between your home and neighbouring properties/roads or footpaths etc
- ✓ repairing any defective ironmongery, catches and bolts on gates which you have installed.

We will:

- ✓ repair any boundary fence that marks the boundary between properties or a road/path etc (please note the Council does not provide six foot fences to all boundaries)
- ✓ repair trip hazards in paths, paving and driveways
- ✓ repair or replace unsafe garden walls and brick sheds
- ✓ remove Japanese knotweed
- ✓ carry out work to trees where they are dead, diseased or dangerous – please note there may be a charge for trees in gardens.

Pests

You are responsible for:

- ✓ keeping the inside of your home clean and disposing of rubbish appropriately to avoid attracting pests

- ✓ treating mice and other pests within your home (e.g., rats, ants, cockroaches and silverfish)
- ✓ reporting any bees or wasps' nests.

We will:

- ✓ treat pests that are a communal problem and carry out pest proofing.

Building Safety

If you have any concerns about resident, or building safety, however great or small, please contact us on 0808 264 444, or e-mail gynrepairs@ncsgrp.co.uk for advice and support, including to arrange a repairs inspection where our surveyor can assess the problem further and take action if necessary.

Appendix B

Repair Category Definitions and Timescales

Emergency Repairs completed within timescale – **Attend in 4 hours, complete in 24 Hours**

Definition

Any defect that puts the health, safety or security of the tenant, or a third party, at immediate risk; or that affects the structure of the building adversely, including:

- Total loss of water
- Burst water main
- Flooding
- Severe storm damage
- Total loss of electricity supply
- Major fault with electricity supply
- Unsafe electricity fittings
- Breaches of security to outside doors and windows
- Total loss of gas supply
- Gas leak (please also report to Gas Emergency Service on 0800 111 999)
- Blocked flue to boiler
- Blocked main drains, soil pipe or sole toilet
- Heating loss during period 31 October – 1 April
- Hot water loss
- Failure of lift
- Failure of warden alarm or call system
- Fire damage
- Offensive or racist graffiti
- Roof leaks - Major

Routine Repairs completed within timescale – **28 Days**

Definition

A defect that can be deferred without serious discomfort, inconvenience or nuisance to the tenant or a third party, or cause long term deterioration of the building, and can await the next convenient maintenance visit, including;

- Breaches of security to internal doors and windows
- Graffiti
- Repairs to doors, windows and floors
- Repairs to external walls, fences and paths
- Repairs to walls, brickwork and slates or tiles
- Repairs or clearing of gutters and downpipes
- Repairs to kitchen fittings

- Repairs to plaster work
- Dripping or leaking taps or shower units
- Other minor plumbing repairs
- Repairs to tiling
- Easing doors and windows
- Other minor day-to-day repairs or replacements
- Faulty extractor fan
- Faulty communal TV aerial
- Entry phone failure
- Defective flooring
- Damage to stair treads, handrails or banisters
- Kitchen/Bathroom - Blocked drains, sinks, basins, baths, toilets (that are not the main drain soil pipe or sole toilet)
- Minor electrical faults – Key Lights
- Minor plumbing leaks or defects
- Defective cistern or overflow – Running or overflow
- Blocked gutters
- Severe dampness (Inspection only)
- Kitchen/Bathroom - Blocked drains, second sinks, basins, baths, toilets caused by a plumbing failure the Council is responsible for (that are not the main drain soil pipe or sole toilet)
- Roof leaks - Minor
- Minor electrical faults – Sockets

Planned Non-Urgent Repairs completed within timescale – 3 Months

Definition

Planned Non Urgent Repairs are landlord responsible repairs which require a replacement rather than a repair of a component; these can be internal or external.

These can include:

- Replacement doors
- Replacement kitchen units
- Replacement baths & basins
- Renewal of fencing & gates
- Major plastering

Appendix C

Secure Tenant Right-to-Repair

THE RIGHT TO REPAIR

In accordance with the 'Secure Tenants of Local Housing Authorities (Right to Repair) Regulations 1994', if a qualifying repair set out below cannot be completed within an agreed timescale, the tenant has the right to request Great Yarmouth Borough Council (GYBC) to instruct a second contractor to complete the work. Where the second attempt, or second contractor also fails to complete the work within the agreed time GYBC will pay compensation to the tenant in accordance with the legislation.

The Right to Repair does not apply in the following circumstances:

- the tenant has told GYBC that they no longer want the qualifying repair carried out
- where the tenant fails to provide details for the contractor to gain access to their home
- access for an inspection or for the repair to be carried out has not been provided by the tenant
- where the contractor needs to order special parts to complete the repair
- where severe weather conditions prevent the contractor from completing the repair
- In leaseholder properties

Qualifying Repairs

Qualifying repairs are those to a tenant's home which do not cost more than £250 and are set out below:

Defect	prescribed period (in working days)
Total loss of electric power	1
Partial loss of electric power	3
Unsafe power or lighting socket or electrical fitting	1
Total loss of water supply	1
Partial loss of water supply	3
Total or partial loss of gas supply	1
Blocked flue to open fire or boiler	1
Total or partial loss of space or water heating between 31 October and 1 May	1
Total or partial loss of space or water heating between 30 April and 1 November	3
Blocked or leaking foul drain, soil stack or toilet pan (where only one in dwelling)	1
Toilet not flushing (where there is no other working toilet in the dwelling house)	1
Blocked sink, bath or basin	3
Tap which cannot be turned	3
Leaking from water or heating pipe, tank or cistern	1
Leaking roof	7
Insecure external window, door or lock	1
Loose or detached banister or hand rail	3
Rotten timber flooring or stair treads	3
Door entry-phone not working	7
Mechanical extractor fan in internal kitchen or bathroom not working	7

What happens when a qualifying repair is reported?

When a qualifying repair is reported, GYBC must issue a repair notice to a contractor and send the tenant a copy with information on how the Right to Repair Scheme works. There will be a time limit for the contractor to do the work by, which will depend on the repair needed as set out in the table above.

What happens if the work isn't done in time?

If the repair work isn't done within the specified time limit, the tenant will need to tell us and ask for another contractor to do the work. If another contractor is available, we will issue a repair notice to them and send the tenant a copy.

What happens if the tenant is not in when the contractor calls?

If the tenant is not at home to let the contractor in as arranged, the scheme no longer applies.

Claiming compensation

If the second contractor doesn't do the repair work within the time limit, the tenant is entitled to £10 in compensation. For every extra day the tenant waits, they will receive another £2. The most compensation for any one job is £50.

If the tenant has any rent arrears, GYBC can use the compensation to reduce the arrears rather than paying the tenant.

Appendix D

APPLICATION TO UNDERTAKE AN ALTERATION OR IMPROVEMENT TO YOUR HOME

Name

..... Tel.....

Address

.....

Description of proposed work (Including working drawings/specification/area plan/sizes):

.....

.....

.....

.....

.....

.....

ADDITIONAL REQUIREMENTS FOR APPLICATION

Citizens Band Radio Aerial

- Details of the type, size and location of the aerial must be submitted to GYBC Housing Assets, Property Services and Asset Management (hereon referred to as GYBC Housing Assets) before approval can be given to applications for the erection of antennae.

Conservatories/Porch

- A detailed sketch showing: relative position, 3 dimensional size, any services including drainage within a minimum of 1m of any part of the structure. Materials and methods of construction shall be submitted and approved prior to the commencement of any work.

Internal fittings

- Details of bathroom and kitchen fittings manufacturer, type, size and location to be submitted

Satellite Dishes

- Details of type, size and location are to be submitted to GYBC Housing Assets before approval can be granted.

- Planning consent must be applied for and granted where the dish exceeds 90cms in any direction, projects above the roofline, or if there is to be more than one aerial on a building.

- If communal aerial facility exists permission will not be granted.

- **No work to be commenced until written approval has been received from GYBC Housing Assets.**

- Permission will be valid for 12 months from the approval date.

- **All improvements are to be undertaken in accordance to GYBC Housing Assets conditions schedule – Failure to comply with these conditions may put your tenancy at risk.**

Tenants(s) Signature:

.....Date:.....

Please return this form to: Great Yarmouth Borough Council, Property & Asset Management Town Hall, Hall Plain, Great Yarmouth, NR30 2QF

Privacy Notice - We will use your personal information for the provision and management of Social Housing. To find more details on how the Council uses your information please visit our website: <https://www.great-yarmouth.gov.uk/privacy/tenancy-services>

Appendix E

Compensation for Improvements

The right to compensation for improvements is subject to certain qualifying criteria and regulations contained in The Secure Tenants of Local Authorities (Compensation for Improvements) Regulations 1994 Statutory Instrument 1994 No. 613. For full details of the Regulations see:

<https://www.legislation.gov.uk/ukSI/1994/613/made>

Entitlement

Entitlement to compensation for a qualifying improvement will depend on whether the following eligibility criteria is satisfied:

- The tenancy must be secure
- Sole tenants or one of both joint tenants are eligible
- Written consent for the alteration must have been given by the Council before the improvement work was carried out
- The alteration must qualify in accordance with the regulations (see qualifying alteration set out below)

Compensation will not be paid in the following circumstances:

- The compensation payable is less than £50
- The tenancy has ended as the result of an eviction
- The tenancy has ended due to the occupant(s) exercising the Right to Buy
- The dwelling house has been disposed of to the tenant or one of the joint tenants under section 32(4) or 43(5); or
- A new tenancy of the same or substantially the same dwelling house has been granted to the qualifying person (or, in the case of a joint tenancy to all joint tenants) whether or not with anyone else
- The notional life of the improvement has expired

Qualifying Improvements

A 'qualifying improvement' means an improvement consisting of the installation, or replacement of an item detailed in table 1 below, together with the notional life of the improvement, which is the life expectancy of the repair in years.

Table 1

Qualifying Improvement	Notional Life
Bath or shower	12
Wash-hand basin	12
Toilet	12
Kitchen sink	10
Storage cupboards in bathroom or kitchen	10
Work surfaces for food preparation	10

Space or water heating	12
Thermostatic radiator valves	7
Insulation of pipes, water tank or cylinder	10
Loft insulation	20
Cavity wall insulation	20
Draught proofing of external doors or windows	8
Double glazing or other external window replacement of secondary glazing	20
Rewiring or the provision of power and lighting or other electrical fittings (including smoke detectors)	15
Any object which improves the security of the dwellinghouse, but excluding burglar alarms	10

Calculating Compensation

In accordance with the Regulations the amount of compensation payable is calculated according to the following formula, which takes into account wear and tear and depreciation.

$$C \times [1 - Y/N]$$

C = original cost of the improvement. (Any financial assistance (such as a grant) that was paid towards the cost of the improvement may be deducted from the cost)

Y = the number of complete years the improvement has been in place (with part of a year being rounded up to a complete year) starting on the date the improvement was completed and ending on the date the compensation is claimed

N = the notional life of the improvement

Deductions or additions to the compensation payable will be made if:

- The cost of the improvement was excessive
- The improvement is of a higher quality than it would have been if the Council had done the work
- The improvement has deteriorated at a greater rate than is specified as the notional life in the Table 1 above
- Any money is owed to the Council by the tenant (e.g. rent arrears, service charge arrears, rechargeable repairs or court costs).

An increase to the compensation payable may be made if the improvement has deteriorated at a lesser rate than is specified as the notional life in Table 1 above.

Compensation can be claimed for the cost of materials (but not appliances such as cookers and fridges) and labour costs, but not the tenants own labour. No compensation can be claimed for professional fees (such as architects), or the costs of any relevant planning permission or consent under Building Regulations.

Compensation will be payable to a maximum of £3000 for any one improvement. No payment will be made if the level of compensation is less than £50.

Making Claims

Claims must be made in writing not more than 28 days before, or 14 days after the date on which a tenancy ends and must contain sufficient information for the claim to be determined, including;

- Name and the address of the Council property where the improvement was made
- The new address
- Daytime telephone number
- What improvement has been made, including any relevant breakdown of specification required to evaluate whether it qualifies and how much of the cost claimed is attributable to the improvement
- How much the improvement cost
- The date the improvement began and finished
- A copy of the invoice to show how much the improvement cost
- A copy of the letter from the Council giving consent to the improvement

CABINET



URN: 23-133

Report Title : Long term lease arrangement and construction update for “The Place”

Report to: Cabinet

Date of meeting : 27/09/2023 ELT and 09/10/2023 Cabinet

Responsible Cabinet Member: Graham Plant

Responsible Director / Officer : Natasha Hayes; Executive Director of Place

Is this a Key decision ? Yes

Date added to Forward Plan of Key Decisions if a Key Decision: 04/08/2023

EXECUTIVE SUMMARY / INTRODUCTION FROM CABINET MEMBER

As part of the of Future High Streets and Town Deal programmes the Borough Council, in partnership with East Coast College (ECC)(working with University of Suffolk (UoS)) and Norfolk County Council (NCC) are developing a Library and University Learning Centre “The Place” in the town centre.

The project is at the stage where the development is progressing to construction stage and part of this includes the disposal of the building through granting 125-year leases to the project partners noted above, to operate their library and learning services and support the Council to realise the outcomes of this aspirational project for the Borough.

This report also provides an update on the progress of the development and the approach to contract award, in line with the approved budget.

RECOMMENDATIONS :

- 1) That Cabinet notes and approves the project progress to date.
- 2) That Cabinet approves the disposal of 37-39 Market Place, Great Yarmouth, subject to agreed heads of terms, by way of granting 125-year leases to East Coast College and Norfolk County Council, in line with the acquisitions and disposals policy.

1. Introduction

As part of the suite of interventions for Future High Streets and Town Deal Funding, the Borough Council has partnered with ECC, UoS and NCC to create a Library and Learning Centre, now named “The Place”. Extensive work has been carried out over the previous two years to purchase the previous Palmers Department store and commence a programme of design, surveying and demolition works to ready the building for its final phase of development.

The Place is due to open in the Autumn of 2024 and represents a £18 million investment in the Town Centre. The project will create a central point where residents can enjoy an expanded, modern Library offer, engage with grass roots education programmes from Adult Learning and progress to formal programmes of learning including Degrees provided by East Coast College and the University of Suffolk. Alongside this a Nursing degree training programme will also be offered from the building by the University of Suffolk in partnership with the James Paget Hospital. The project will create a trusted, welcoming and inclusive environment, where local people will be able to improve their skills. Defined skills pathways will exist for upskilling, improve educational attainment and capitalise on career opportunities in local growth economies.

Great Yarmouth Borough Council is contributing £7.46m from the government's Town Deal programme and £3.4m from the Future High Streets Fund respectively. Both these funds are integral to the town's vision to improve and regenerate the town centre and address economic growth constraints. In addition, Norfolk County Council is providing £2 million to support the relocation of the Library, and £3.5 million was committed by East Coast College and the University of Suffolk partnership for the development of the University Centre. Formal approval from central government, provides a further £1m of Town Deal funding bringing the budget to £18m. This budget increase was necessitated by the very high inflationary costs seen recently in the construction industry.

The asset will be fully owned by Great Yarmouth Borough Council, who have obtained the freehold title on 26th November 2021. Great Yarmouth Borough Council will lease the building to the tenants on a long-term (125 year) lease term, the tenants will initially pay a peppercorn rent. The first break clause and rent review will occur after 40 years.

These arrangements have been agreed by all partners and formulated in a Heads of Terms document (annex 1), which sets out the high-level arrangements, as summarised below:

- 125 year lease with break clauses in years 40, 60, 80, 100 and 120. The landlord has the right to break the remaining lease if one of the tenants invokes its break clause;
- Initial peppercorn rent with reviews in years 40, 60, 80, 100 and 120;
- Subletting is allowed if within permitted use of the building (as a public library, for the provision of education or community use);
- The landlord is responsible for the upkeep of the building fabric, including the refurbishment and replacement of the building's fabric and mechanical and electrical services;
- The tenants are responsible for their own utility charges, rates, contents insurance, cleaning, security and decoration and reactive maintenance in their own demise;
- The landlord will charge the tenants an annual service charge, which is a recharge of a proportion of actual costs incurred and commensurate with the size of the tenant's demise. The service charge will include costs relating to the utilities in shared areas, the service and maintenance of mechanical and electrical plant, security and access control systems, annual statutory compliance testing, fire safety systems and buildings insurance;
- An Operational Management Board constituted of landlord and tenants will meet quarterly to address issues and oversee the smooth management of the building. A Partnership Agreement will set out operational arrangements. Disputes between tenants will in the first instance be resolved by Great Yarmouth Borough Council as the landlord. In the event of a dispute, parties will have recourse to the Royal Institute of Chartered Surveyors' (RICS) Dispute Resolution Service (or similar).

The Heads of Terms have been further developed into an Agreement for Lease, which sets out the legal and delivery arrangements during the development and construction stage of the project. A Lease agreement sets out the legal, operational and maintenance arrangement which will come into force once the construction has been completed.

The two main tenants of the building – East Coast College and Norfolk County Council – will each have a demise area of roughly 50%. Each partner will pay a service charge commensurate with the size of their demise, based on the actual costs of providing the hard facilities management services which the landlord will incur as part of its normal duties. There will also be a contribution towards the long-term maintenance of the building (payment on account) to ensure that the building can be maintained and kept in good condition.

There will be no separate legal entity responsible for running the building. Instead, each tenant will be responsible for their own delivery and employ their own staff to deliver from their demise.

In other words, the arrangements will be that of the traditional landlord-with-multiple-tenants. Great Yarmouth Borough Council will be the landlord. East Coast College and Norfolk County Council will be the tenants. The tenants will take possession and the lease will kick in when the building works are completed in Autumn 2024.

Norfolk County Council have approved to enter into the lease at their Cabinet of the 3rd July 2023.

Construction approach and procurement

Enabling works were successfully completed on budget in December 2022. The benefit of carrying out the asbestos and strip-out works early was to de-risk the project: it was possible to unearth all the issues surrounding hazardous materials, structural integrity and the condition of the existing masonry and timber.

The next stage is to replace the roof, which is in a very poor state of repair, and needs to be replaced in its entirety. The reason for bringing this package forward is to make the building water-tight and ensure a smooth and speedy internal fit-out and is another way of de-risking the main project. These works have been contracted to Morgan Sindall following a procurement process using the SCAPE framework. Morgan Sindall started on site on 11th September, and the building is expected to be water-tight by 11th November.

The final stage of construction has been procured based on a Stage 2 fixed price from the SCAPE contractor, Morgan Sindall. Having a fixed price contract provides cost certainty to both Great Yarmouth Borough Council and the tenants, as the team will be able to define exactly what is being delivered for the end tenants/users. The project has a fixed budget, and there is no scope for the costs to increase beyond the funding already available. After some negotiation, a fixed price has been agreed with Morgan Sindall for the main contract in August 2023 which is within the agreed budget. The contract will be awarded to Morgan Sindall on this basis, with the agreement of partners.

Partnership Agreement

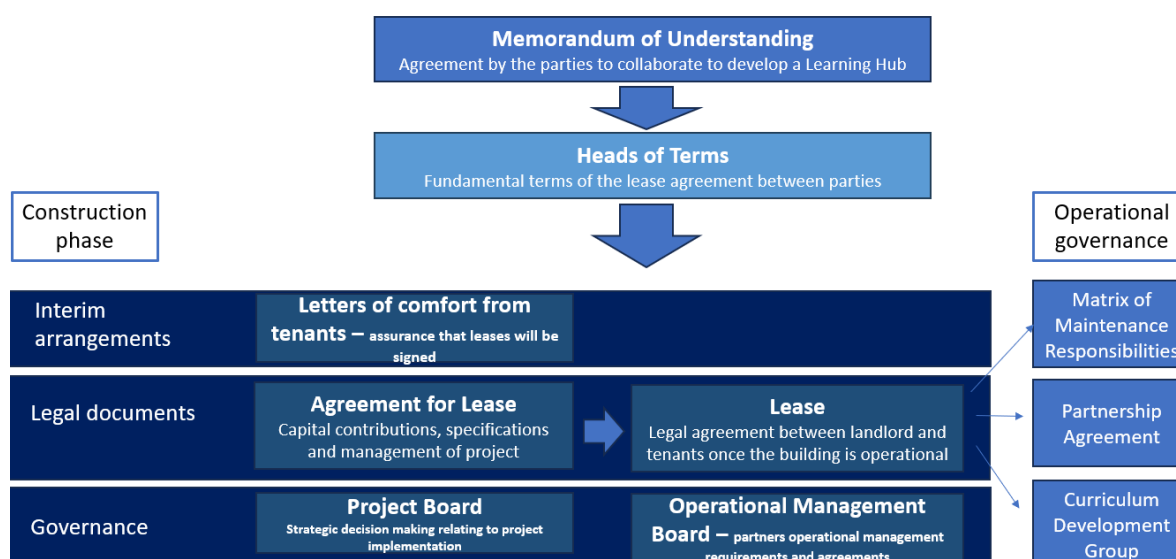
A Partnership Agreement will be put in place outlining the arrangements between tenants in terms of roles and responsibilities, and an agreement for the delivery of various elements of the skills offer to ensure an excellent customer experience. It will ensure good co-operation, reduce duplication, fill gaps in provision and enable a coherent and integrated skills offer for the residents of Great

Yarmouth, this partnership agreement will be signed by partners and will run concurrent to the lease.

As a complex site with a number of organisations operating from it, there is a national precedent of challenges and relationship breakdown, associated with managing assorted strategic priorities. Learning from other multi-partner sites such as the Forum in Norwich we have developed the partnership agreement to provide clear processes and procedures to facilitate strong working relationships and resolve disputes.

Disputes between tenants will in the first instance be resolved by the Operational Management Board. Great Yarmouth Borough Council as landlord will be the arbiter of disputes between tenants. If no resolution is possible or if the dispute is of a lease-related or legal nature, or if the dispute is between the landlord and one or both tenants, the matter will be referred to the Royal Institute of Chartered Surveyors' (RICS) Dispute Resolution Service (or similar).

In addition to the partnership agreement, we will implement the following governance model that covers every aspect of the building management and operations:



The governance approach will need to transition from construction and project delivery to the operational phase post construction as detailed in the above diagram. Similarly, the legal documentation surrounding the building has developed from the early Memorandum of Understanding, through to Heads of Terms, agreement for lease and to the final lease documents. All partners have provided letter of comfort confirming their intentions to sign these leases with the aim that these will be agreed by the end of October 2023.

The heads of terms also detail that the tenants are responsible for their day-to-day soft facilities management and the partners are working together to develop a shared FM approach. There is no responsibility for the Council to provide or fund these services.

2. Work to Date / Proposal

Heads of terms for the leases have already been approved with Norfolk County Council having agreed to sign this lease at their cabinet of the 3rd July 2023. East Coast College's Corporation (Board of Governors) signed off the Heads of Terms in December 2022 once University of Suffolk's

executive committee approved the grant funding. It is expected that both partners will sign their lease upon the agreement of GYBC to grant the lease.

The proposal is as noted in this paper – to grant leases of 125 years to ECC and NCC for their demise, with a breaks and rent reviews after 40, 60, 80, 100 and 120 years.

The future use of this property in terms of the provision of Library and Learning Services provides exceptional opportunities to improve the economic and social well-being of the area as detailed in this paper and the previous business case submitted to DLUHC. Furthermore, it improves the environmental wellbeing of the area by refurbishing a disused building in considerable disrepair. This regeneration could not be achieved without the financial contribution of the partners.

3. Impact / Next Steps

Next steps will be for leases to be signed by ECC and NCC and to progress to the build stage of the project as detailed in this paper.

4. Financial Implications

The tenants are to contribute a total of £5.5m towards refurbishment costs (Norfolk County Council £2m, East Coast College £3.5m).

In consideration of the works to be funded by each tenant, leases will be granted for 125 years with an initial peppercorn rent period of 40 years has been agreed.

This is traditionally known as a long lease arrangement where by the tenants capital investment is being recognised as supporting the development of the site. If the capital contribution was not required for the scheme then the tenants would be paying a market rent from the outset of the lease.

In granting a long lease, officers must have regard to the Councils Acquisition and Disposal Policy. Any lease in excess of 7 years duration is considered a disposal.

Under Section 123 of the Local Government Act 1972 principal councils have a duty not to sell land (including long leases) for a consideration less than the best consideration reasonably obtainable.

To demonstrate best consideration has been reasonably obtained, a valuation has been undertaken by the Councils Asset Surveyor. The valuation analysis (appendix 2) assessed the capital each occupier is investing in comparison to a hypothetical capital value of their lease interest for a term of 125 years. In summary;

- The occupiers of the building are to contribute a total of £5.5m capital for refurbishment costs (Norfolk County Council £2m & East Coast College £3.5m).
- The hypothetical capital value of Norfolk County Councils lease is in the region of £1.5 million and therefore less than the capital investment made (£2 million).
- On the same basis the hypothetical capital value of East Coast Colleges lease is in the region of £860k and therefore less than the capital investment made (£3.5 Million).
- The valuation has therefore established that the capital investment by each occupier sufficiently fulfils the requirement for best consideration under the long lease arrangements proposed.

Business Rates

It should be noted that on completion of the scheme liability for business rates to the demised areas will rest with the occupiers

5. Risk Implications

None identified.

6. Legal Implications

Formal signing and sealing of leases.

7. Conclusion

This project is a core element of both Town Deal and Future High Streets suite of interventions, providing a wonderful opportunity for residents to learn new skills, engage with community events and benefit from a modern Library in the heart of the Town. We will address key barriers to employment and skills in the Borough, create a circular economy by providing residents with the skills they need to unlock well paid local jobs and raise aspiration and prosperity. The formalisation of the lease arrangements and the progression to the build phase, marks a milestone in this ambitious project.

8. Background Papers

1.0 Heads of terms

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

Consultations	Comment
Monitoring Officer Consultation:	
Section 151 Officer Consultation:	
Existing Council Policies:	
Equality Issues/EQIA assessment:	

Great Yarmouth Learning Hub

University Centre and Public Library

Outline agreement for Heads of Terms / Development Agreement

No	Area	Terms
1	Freehold owner & Landlord	Great Yarmouth Borough Council
2	Leaseholders	(1) Norfolk County Council; and (2) East Coast College
3	Lease period	Long lease 125 years
4	Tenant Break clauses	Break clauses in years 40, 60, 80, 100 and 120.
5	Landlord Break Clauses	Landlord to have the right to break remaining lease if a tenant invokes its break clause.
6	Demise	Schedule 1 drawings to show the demised area for the exclusive use and responsibility of each tenant, as well as areas for shared use, for which the landlord retains responsibility.
7	Permitted use	Town & Country Planning Act Part B F.1: the provision of education, the display of works of art, a public library or public reading room, a public hall or exhibition hall for community use and ancillary activities.
8	Rent	Peppercorn
9	Utilities	Each demise to be sub metered and tenants to pay their own charges. Utilities for shared areas will be included in the service charge.
10	Service charge and on-account maintenance and upkeep payment	<p>The tenant is responsible for the payment of a service charge to the landlord, which will be a recharge of a proportion of actual costs incurred and commensurate with the size of the tenant's demise. The service charge will include costs relating to the utilities in shared areas, the service and maintenance of mechanical and electrical plant, security and access control systems, annual statutory compliance testing, fire safety systems and buildings insurance. The apportionment of the shared costs will be proportionate to the tenants' share of the demise, and will be reviewed at Strategic Management Board meetings annually if required.</p> <p>A charge will also be made to the tenants by the landlord to provide for the costs of internal and external planned maintenance and upkeep of the building, including the refurbishment and replacement of the building's fabric and mechanical and electrical services, for which the landlord retains responsibility.</p> <p>This will be charged as an annual on-account payment by the landlord to the tenants, and the initial payment schedule will be</p>

		<p>based on an estimate of costs over a 25-year period, evenly spread out over 25 years to remain roughly equal year-on-year with an inflationary uplift.</p> <p>The annual payment will be reassessed annually, this assessment will include analysis of actual expenditure during the previous periods and any likely variation in projected expenditure over the remainder of the 25-year period.</p> <p>If required, the services of a Quantity Surveyor will be engaged to estimate costs of works for which there is no precedent.</p> <p>The landlord will provide the tenants with actual costs incurred in the previous period against the on-account payments.</p> <p>The annual review will also include an agreement regarding the standard and quality of any works which are included in the planned maintenance which form the calculation of the payment to be made.</p> <p>In the event of a dispute, parties will have recourse to the Royal Institute of Chartered Surveyors' (RICS) Dispute Resolution Service (or similar).</p>
11	Payment of service charge	The tenant is responsible for paying the annual service charge set out in section 10 above in quarterly instalments on the standard quarter days based on an estimate, which will then be adjusted retrospectively annually, to reflect actual costs.
12	Subletting	Room rental (hourly, daily or weekly) is permitted. Subletting of areas to partners who comply with the permitted use of the building is permitted with the prior permission of the landlord. Permission will not be unreasonably withheld by the landlord.
13	Assignment	Permitted to allow for a change in the legal status of any of the parties, provided that it is acceptable to the remaining tenant and landlord. Likely standard provisions re assignment of whole only subject to the consent of landlord. Permission will not be unreasonably withheld by the landlord.
14	Facilities Management and Maintenance	<p>The tenant is responsible for the redecoration and reactive maintenance in their own demise. Planned maintenance and the upkeep of the mechanical and electrical plant are excluded. Schedules to clarify the standard of decorative order expected of the building will be set out in Schedule 2.</p> <p>The landlord is responsible for the upkeep and maintenance of all shared areas as well as the fabric of the building, shared plant and all external areas.</p>
15	Parking	Car parking is currently available on an hourly basis in the pay & display adjacent car park (Howard Road South), which is free to use after 4pm. Monthly passes could be requested and issued for a fixed charge by GYBC, who owns part of the car park

		jointly with Panther. Parking provision is not included in the lease or service charge.
16	Loading	The tenants will have access to a loading bay for loading and offloading goods.
17	Cleaning	Tenants are responsible for cleaning in their own demise. The landlord is responsible for cleaning in shared demise areas.
18	Security	CCTV cameras (not actively monitored) and access control cards will be installed. The landlord will not provide in-person security. Each tenant will be responsible of the security of their own area. Tenants will be responsible for establishing procedures for the locking and unlocking of the building.
19	Personnel	The landlord will not provide any dedicated personnel on site to manage the facility; it will be the tenants' responsibility.
20	Operational Management	An Operational Management Board constituted of tenants will meet quarterly to address issues and oversee the smooth management of the building. The frequency of meetings will be reviewed. A strategic management board consisting of senior management of the tenants and landlord will also meet quarterly.
21	Dispute resolution	Disputes between tenants will in the first instance be resolved through the Operational Management Board. If no resolution is possible, disputes will be escalated to the Strategic Management Board. If no resolution is possible or if the dispute is of a lease-related or legal nature, or if the dispute is between the landlord and one or both tenants, the matter will be referred to the Royal Institute of Chartered Surveyors' (RICS) Dispute Resolution Service (or similar).
22	Hours of operation	Opening hours are to be agreed and managed by tenants, independent of the landlord.
23	VAT	The service charge will be subject to VAT. Tenants will be responsible for paying VAT in line with their own HMRC status.
24	Rates	Each party to pay their own rates directly.
25	Insurance	Landlord to fund buildings insurance and recharge via service charge proportionately. Tenants to insure contents in their demise.
26	Legal costs	Each party to bear their own legal costs.
27	Agreement for Lease	Prior to the lease coming into force upon practical completion, an Agreement for Lease (Schedule 4), which will set out the parties' intention to enter into a lease, will be in force during the refurbishment stage. The document will record the parties' obligations and how risks are to be distributed. It will set out how the construction works will be managed, what the parties' financial contributions are and how variations and cost escalations will be dealt with. In principle (1) the parties provide funding to GYBC; (2) GYBC carry out refurbishment works to an agreed design and specification; (3) leases are granted when works completed.

Schedules to the Lease

Schedule 1: Demise Drawings

Schedule 2: Standard of decorative order expected of the building in shared and tenant-only areas.

Schedule 3: Fittings, fixtures and services for which the landlord and the tenant are respectively responsible for the maintenance and replacement.

Schedule 4: Development agreement (agreement for lease) and tenants works approval document

Other schedules



GREAT YARMOUTH
BOROUGH COUNCIL

PROPERTY ADDRESS

Former Palmers Department Store, 37-39 Market Place, Great Yarmouth, Norfolk

INSTRUCTIONS

Instructions were received to provide an opinion of the current market value of the proposed leasehold interests in the above property on the open market.

It is understood that a hypothetical valuation is required in order to demonstrate that the investment being made by the prospective tenants warrants the rent free period being offered. This is for internal purposes use only to assist with the proposed letting of the building and as such is not a “red book” valuation. The valuation should not be relied upon by any third parties.

I confirm that so far as I am aware no conflict of interest exists in our undertaking this work on your behalf.

I confirm that the valuer has sufficient current local market knowledge, skills and understanding to undertake the valuation competently.

The basis of the valuation is market value. This is defined as follows: -

The estimated amount for which an asset or liability should exchange on the valuation date between a willing buyer and a willing seller in an arm's length transaction after proper marketing and where the parties had each acted knowledgeably, prudently and without compulsion.

INSPECTION

The property has not been inspected. The instructions being to undertake a desk top exercise only.

The property was previously inspected externally only in November 2021.

APPENDICES

The following appendices are attached:

Appendix 1 - Schedule of comparable evidence

Appendix 2 - Ordnance Survey extract showing the site.

Appendix 3 - Stipulations under which this report is issued.

Appendix 4 - Supplied Floor Plans

LOCATION

The subject property forms part of a prime retail area within the town centre and benefits from having frontage to the Market Place. Nearby occupiers include Halifax, HSBC, Lloyds, Barclays, WH Smith and Nationwide.

Great Yarmouth town centre has been in decline as a trading location for many years and many major retailers have now withdrawn altogether or relocated to the nearby retail park. Many units in prime retail areas within the town have been long term void including the subject property.

DESCRIPTION

The property comprises a 4 storey terraced retail premises with a basement, formerly used as a department store. It is understood that the main building fronting the Market Place was constructed during the latter years of the 19th century following destruction of the original building by fire in 1892. There are a number of additions to the rear of varying ages.

It is understood that the building is not listed however it does form part of a conservation area.

An Ordnance Survey extract showing the site is appended to this report.

CONSTRUCTION

From our previous inspection, the buildings appear to be primarily of solid masonry construction. The main front building has a slate covered mansard roof with a tower to the north east corner. The rear additions primarily have pitched slate covered, and flat felt roofs. The roofs of the later 2 storey additions to the north/west of the site have pitched fibre cement sheet covered roofs. External joinery is formed in timber, pvc & steel. Rainwater goods are formed in cast iron, fibre cement and pvc.

ACCOMMODATION

The property is in the process of being converted to form a library over the ground floor and basement, and a further education facility on the upper floors. We have been provided with plans and floor areas and understand that the proposed accommodation is to comprise as follows:

Library

Basement

NIA 5,576ft²/518.11m²

Ground Floor

NIA 16,531ft²/1,535.79m²

College

First Floor

NIA 16,737ft²/ 1,554.93m²

Second Floor

NIA 2,025ft²/ 188.17m²

Third Floor

NIA 1905ft²/ 176.96m²

CONDITION

Whilst we have had regard to the current state of repair and condition of the property, we have not carried out a structural survey nor have we inspected woodwork or other parts of the property which were covered, concealed or inaccessible. The services have not been tested.

It is understood that comprehensive renovation/repair works are to be undertaken as part of the proposed conversion and we have valued on the basis that these works have been fully completed to a satisfactory standard.

STATUTORY ENQUIRIES

It is assumed that planning consent will be obtained for the intended works/use.

SERVICES (not tested)

Mains water, electricity, gas and drainage are assumed to be connected to the property. It is assumed that the completed units will be fitted with air conditioning and central heating systems.

ENVIRONMENTAL ISSUES

We are not aware of any adverse environmental issues affecting the site. Please refer to the stipulations appended to this report.

TENURE

The tenure of the proposed interests is understood to be leasehold, the proposed terms are detailed below.

OCCUPATIONAL LEASES AND OTHER AGREEMENTS

It is understood that leases are to be granted to 2 tenants. The salient points of these leases are as follows:

Ground Floor/Basement (Library)

Tenant: Norfolk County Council

Demise: edged purple on plan

Term: 125 years

Initial Rent: nil

Review: Year 40 to MR thereafter every 20 years (for permitted use)

Mutual Breaks: Break clauses in years 40, 60, 80, 100 and 120. The landlord has the right to break the remaining lease if one of the tenants invokes its break clause;

Service Charge: cleaning, maintenance etc of retained areas, common parts, shared services (with lettable areas) inc heating, air con, data/telecommunications, h&c water,

Insurance: Landlord & recharge to tenant

User: education

Alienation: assignment & subletting of whole with consent

Repair:

Tenant – internal. Landlord

Alteration: non structural only with consent

Security of Tenure: Contracted Out

Upper Floors

Tenant: East Coast College

Demise: edged blue on plan

Term: 125 years

Initial Rent: nil

Review: Year 40 to MR (for permitted use) thereafter every 20 years

Mutual Breaks: Break clauses in years 40, 60, 80, 100 and 120. The landlord has the right to break the remaining lease if one of the tenants invokes its break clause;

Service Charge: cleaning, maintenance etc of retained areas, common parts, shared services (with lettable areas) inc lighting, heating, h&c water, air con, data/telecommunications, h&c water,

Insurance: Landlord & recharge to tenant

User: education

Alienation: assignment & subletting of whole with consent

Repair:

Tenant – internal. Landlord

Alteration: non structural only with consent

Security of Tenure: Contracted Out

It is understood that the rent review and break provisions in both leases are still being negotiated and as a result valuations are required with and without these clauses.

MARKET TRENDS AND GENERAL COMMENTS

There is no direct evidence available for the use proposed, the rental values adopted are therefore primarily based on office rental values being the nearest alternative use. It is stressed however that occupational demand in the town for offices is extremely limited as is recent transactional evidence.

VALUATION

Having considered matters we have formed the following opinions:

Market Rent

1. The current Market Rent of the Library unit on the open market as described above as at 22nd February 2023 is in the region of £164,000 (One Hundred and Sixty Four Thousand Pounds) per annum.
2. The current Market Rent of the Further Education unit on the open market as described above as at 22nd February 2023 is in the region of £103,000 (One Hundred and Three Thousand Pounds) per annum.

Capital Value

3. The Market Value of the leasehold interest in the Library unit as described above on the open market, as at 22nd February 2023 is in the region of £1,000,000 (One Million Pounds)
4. The Market Value on the same basis as above but on the special assumption that there is no provision in the lease to review the annual rent and no option to break is in the region of £1,563,000 (One Million Five Hundred and Sixty Three thousand pounds)
5. The Market Value of the leasehold interest in the Further Education unit as described above on the open market, as at 22nd February 2023 is in the region of £593,000 (Five Hundred and Ninety Three Thousand pounds).
6. The Market Value on the same basis as above but on the special assumption that there is no provision in the lease to review the annual rent and no option to break is in the region of £858,000 (Eight Hundred and Fifty Eight thousand pounds)

In arriving at the Market Value, the valuer has adopted the investment approach applying a yield of 10.5% to the Market Rent in respect of the ground floor, and 12% to the upper floors. This is adjusted in the valuation of the lease including the Market Rent reviews to reflect the disadvantages in investment terms associated with the receipt of a profit rent for a period of only 40 years.

The Capital Value of the tenants interest increases according to the length of the rent free period offered as is demonstrated in the differences in the values quoted in 3 & 4 and 5 & 6 above.

The valuer's opinion of Market Rent was primarily derived from analysis of comparable recent market transactions on arm's length terms however please note the comments above in this regard. A rate of £8 per ft² has been adopted in respect of the ground floor, £36 per ft² for the café, and £5 per ft² for the upper floors. The yield adopted has been derived from analysis of available recent market evidence.

Appendix 1 - Schedule of Comparable Evidence

Rental Transactions

Office

Town Centre Offices Available to let

25-26 Hall Quay - East

Ground floor office 2268ft², Asking £14,750 pa/£6.50ft, 4 parking spaces, town centre location.

21-22 Hall Quay

1st floor suite, refurbished, 3 parking spaces, 984ft² marketed for several years at £12,000 pa £12.19 p/ft - let to East Commercial under a licence agreement at £5 p/ft

83 North Quay - East

Ground floor office, refurbished, 404 ft² asking £5,196 pa/£12.86 ft²

Suite 1, Ground floor, 21 Hall Quay (former HSBC) Term: 10-20 Years from 2014, initial rent: £30,000 pa + service charge, Review 5 yearly, IR ext repairs recharged via service charge – Virtual FRI, user: Solicitors offices, newly refurbished offices, comfort cooling, parking. 3525 ft²/£8.51 p/ft

Copperfield House, The Conge, term 75 yrs from 1987, Rent £5,568 reviews 5 years to 8% MR, 2012, 17 & 22 reviews not implemented, FRI, User Offices, Modern (1987) 2 storey office with lift, parking, MR £69,600/ NIA 9910ft² (disregarding T's Imp) = £7.02 p/ft

Excalibur Road, Beacon Park

Unit 1 – Ground floor office suite approx. 1,000ft², 6 parking spaces, 3 years from Jan 22, £12,500pa Virtual FRI - £12.50ft²

Unit 3 – 2 storey office building approx. 2,500ft², terms agreed for new 3 years lease Virtual FRI at £30,000pa, tenancy at will granted from April 22 pending completion of lease - £12ft²

Unit 4 – Ground floor office suite approx. 1,000ft², 6 parking spaces, 3 years from Oct 21, virtual FRI, 5 parking spaces, £7,939 yr 1 then 12,500pa, ave £10,979pa - £11ft²

Commercial Freehold Sales

Address	Type	Accommodation	Price	Date
100 High Street Lowestoft	Office/Retail Investment	Shop let sole trader 9 year lease 2021 @ £11,000 pa Rear Office let 5 years from 2018 £5,000pa	£150,000 Initial Rent £16,000pa 10.67%	26-10-22
179 180 181 King Street Great Yarmouth Norfolk NR30 1LS	Freehold Retail Investment	3 x 3 storey retail units (1 vacant), let to HSBC 10 years from 2012 & River Island 5 years from 2017, rent passing £122,300, potential fully let £184,800	£750,000 Initial yield 16.3%, potential 24.5%	Dec 19
34 Market Place Gt Yarmouth	Freehold retail investment	Grade II listed 3 storey retail premises close to subject let to Yours retail ltd 10 years from 2019 at £22,500pa, 598.71 sq m	£230,000 Yield 9.8%	July 2019
36 North Quay Great Yarmouth Norfolk	Leasehold Office Investment	1980s 3 storey office block with parking let 5 years at £100,000pa, ground lease exp 2079 rent £600pa	£700,000 Yield 14.2%	March 2018

Source: Rightmove/Auction House

Appendix 2 – Location Plan





URN:

Report Title: 2022/23 TREASURY MANAGEMENT OUTTURN REPORT

Report to: Cabinet

Date of meeting: 9th October 2023

Responsible Cabinet Member:

Responsible Director / Officer : Financial Services Manager

Is this a Key decision? No

Date added to Forward Plan of Key Decisions if a Key Decision:

EXECUTIVE SUMMARY / INTRODUCTION FROM CABINET MEMBER

This report presents the treasury management activity for the 2022/23 financial year and includes:

1. The overall treasury position for 2022/23
2. The borrowing requirement and debt for 2022/23
3. The borrowing outturn for 2022/23
4. Reporting on the quarter 1 2023/24 treasury and capital prudential indicators

RECOMMENDATIONS :

That Cabinet : It is recommended approve the Treasury Management outturn report and indicators for 2022/23.

1. INTRODUCTION

- 1.1 The Council adopted the Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice (the CIPFA Code) which requires the Council to approve treasury management semi-annual and annual reports. This report fulfils that requirement.
- 1.2 The Council's treasury management strategy for 2022/23 was approved at a meeting of the Council in February 2022. The Council has borrowed and invested substantial sums of money and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of risk remains central to the Council's treasury management strategy.
- 1.3 The 2021 Prudential Code includes a requirement for local authorities to provide a Capital Strategy, a summary document approved by full Council covering capital expenditure and

financing, treasury management and non-treasury investments. The Council's Capital Strategy, complying with CIPFA's requirement, was approved by full Council in February 2022.

2. LOCAL CONTEXT

- 2.1 The national context and economic commentary is provided as background to the report within Appendix A. On 31 March 2023, the Council had net borrowing of £117.176m arising from its revenue and capital income and expenditure. The underlying need to borrow for capital purposes is measured by the Capital Financing Requirement (CFR), while usable reserves and working capital are the underlying resources available for investment. These factors are summarised in Table 1 below.

Table 1: Balance Sheet Summary	31.3.23 Actual £m
General Fund CFR	£76.424
HRA CFR	£91.306
Total CFR	£167.730
Less: Other debt liabilities*	(£0.564)
Borrowing CFR	£167.166
Less: Usable reserves	(£48.661)
Less: Working capital	(£1.329)
Net borrowing	£117.176

* Finance leases and transferred debt that form part of the Council's total debt

- 2.2 The council pursued its strategy of keeping borrowing and investments below their underlying levels, sometimes known as internal borrowing, to reduce risk and keep interest costs low.
- 2.3 The treasury management position as at 31 March 2023 and the change during the year is shown in Table 2 below.

Table 2: Treasury Management Summary	31.3.22 Balance £m	2022/23 Movement £m	31.3.23 Balance £m	31.3.23 Rate %
Long-term borrowing	£82.487	£5.998	£88.485	4.22% - 4.95%
Short-term borrowing	£53.003	(£20.002)	£33.001	3.90% - 4.65%
Total borrowing	£135.490	(£14.004)	£121.486	
Long-term investments	£1.000	£0.000	£1.000	0.41%
Cash and cash equivalents	£42.887	(£39.577)	£3.310	3.93% - 3.87%
Total investments	£43.887	(£39.577)	£4.310	
Net borrowing	£91.603	£25.573	£117.176	

Note: the figures in the table are from the balance sheet in the Council's statement of accounts, but adjusted to exclude operational cash, accrued interest and other accounting adjustments. Long-term investments consist of CCLA Property Fund a mid-long-term strategic investment.

BORROWING UPDATE

- 2.4 CIPFA's 2021 Prudential Code is clear that local authorities must not borrow to invest

primarily for financial return and that it is not prudent for local authorities to make any investment or spending decision that will increase the capital financing requirement, and so may lead to new borrowing, unless directly and primarily related to the functions of the Authority. PWLB loans are no longer available to local authorities planning to buy investment assets primarily for yield unless these loans are for refinancing purposes. The council has reviewed its capital programme and is not undertaking any such capital projects that are primarily for commercial return.

BORROWING ACTIVITY

- 2.5 At 31 March 2023 the Council held £121m of loans, a decrease of £14.1m from 31 March 2022, as part of its strategy for funding previous and current years' capital programmes. Outstanding loans on 31 March are summarised in Table 3 below.

Table 3: Borrowing Position	31.3.22 Balance £m	2022/23 Movement £m	31.3.23 Balance £m	31.3.23 Rate %	31.3.23 Maturity years
Public Works Loan Board	£71.386	£0.000	£71.386	3.15%-4.40%	10-40 years
Banks (LOBO)	£3.000	£0.000	£3.000	4.95%	1-2 years
Banks (fixed term)	£7.000	£0.000	£7.000	3.35%-3.98%	<1-60 years
Local authorities (long-term)	£1.196	£5.904	£7.100	4.44%	>1 year
Local authorities (short-term)	£53.001	(£20.001)	£33.000	0.09%-0.28%	<1 year
Total borrowing	£135.583	(£14.097)	£121.486		

- 2.6 The Council's chief objective when borrowing has been to strike an appropriately low risk balance between securing low interest costs and achieving cost certainty over the period for which funds are required, with flexibility to renegotiate loans should the Council's long-term plans change being a secondary objective. The Council's borrowing strategy continues to address the key issue of affordability without compromising the longer-term stability of the debt portfolio and, where practicable, to maintain borrowing and investments below their underlying levels, sometimes known as internal borrowing.
- 2.7 The cost of both long and short-term borrowing rose dramatically over the year, with rates at the end of March around 2% - 4% higher than those at the beginning of April. Rate rises have been driven primarily by inflation and the need for central banks to control this by raising interest rates. Rates have now fallen from September peaks but remain volatile and well above recent historical norms. The PWLB 10 year maturity certainty rate stood at 4.33% at 31st March 2023, 20 years at 4.70% and 30 years at 4.66%.
- 2.8 A new HRA PWLB rate of gilt yield plus 0.4% (0.4% below the currently available certainty rate) was announced on 15th March 2023. This discounted rate is to support local authorities borrowing for Housing Revenue Accounts and the delivery of social housing and is expected to be available from June 2023, initially for a period of one year.
- 2.9 In furtherance of these objectives, new loans totalling £39m were borrowed in 2022/23 to repay £53m existing short-term borrowing and create liquidity. This strategy enabled the Council to reduce net borrowing costs by utilising the Local authority lending market.
- 2.10 New borrowing of £39m from Local Authorities in the year was for less than 1 year and at interest rates between 3.90% and 4.65%. Loans repaid to Local Authorities in the year of

£53m were from between less than a month and 1 year at interest rates of between 0.09% and 0.28*%.

- 2.11 The Council's borrowing decisions are not predicated on any one outcome for interest rates and a balanced portfolio of short and long-term borrowing was maintained.
- 2.12 LOBO loans: The Council continues to hold £3m of LOBO (Lender's Option Borrower's Option) loans where the lender has the option to propose an increase in the interest rate as set dates, following which the Council has the option to either accept the new rate or to repay the loan at no additional cost. The bank did not exercise its option to increase the rate during the year.

TREASURY INVESTMENT ACTIVITY

- 2.13 CIPFA published a revised Treasury Management in the Public Services Code of Practice and Cross-Sectoral Guidance Notes on 20th December 2021. These define treasury management investments as investments that arise from the organisation's cash flows or treasury risk management activity that ultimately represents balances that need to be invested until the cash is required for use in the course of business.
- 2.14 The Council holds a significant level of invested funds, representing income received in advance of expenditure plus balances and reserves held and money borrowed in advance of need. During 2022/23, the council's investment balances ranged between £12m and £61m, averaging £29m due to timing differences between income and expenditure. The investment position is shown in table 4 below.

Table 4: Treasury Investment Position	31.3.22 Balance £m	2022/23 Movement £	31.3.23 Balance £m	31.3.23 Income Return %	31.3.23 Rate %
Banks & building societies (unsecured)	£1.155	£0.283	(£0.872)		0.35%
Government (Inc. local authorities)	£27.730	(£27.730)	£0.000		0%
Money Market Funds	£20.000	(£15.820)	£4.180		4.08% - 4.12%
Pooled Property Funds	£1.000	£0.000	£1.000	3.62%	4.26%
Total investments	£49.885	(£43.267)	£4.308		

- 2.15 The main reason the balance held in investments has reduced from the prior year is due to the final settlement and repayment of £23m Government funds during 2022/23 that were received in advance of spend in relation to COVID business grants.
- 2.16 Both the CIPFA Code and government guidance require the Council to invest its funds prudently, and to have regard to the security and liquidity of its treasury investments before seeking the optimum rate of return, or yield. The Council's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income.
- 2.17 Bank Rate has increased from 0.75% at the beginning of the year to 4.25% at the end of March 2023. Short-dated cash rates, which had ranged between 0.7% - 1.5% at the

beginning of April, rose by around 3.5% for overnight/7-day maturities and 3.3% for 6-12 month maturities.

- 2.18 By end March 2023, the rates on DMADF deposits ranged between 4.05% and 4.15%. The return on the Council's sterling Low Volatility Net Asset Value (LVNAV) Money Market Funds ranged between [0.9% - 1.1% p.a.] in early April and between [3.8% and 3.9%] at the end of March.
- 2.19 The progression of credit risk and return metrics for the Council's investments managed in-house are shown in the extracts from Arlingclose quarterly investment benchmarking in table 5 below.

Table 5: Investment Benchmarking – Treasury investments managed in-house	Credit Score	Credit Rating	Bail-in Exposure	Weighted Average Maturity (days)	Total Return %
31.03.2022	4.25	AA-	43%	68	0.46%
31.03.2023	5.10	A+	32%	290	1.50%
Similar Las	4.52	A+	63%	56	3.57%
All Las	4.56	A+	59%	12	3.67%

- 2.20 Externally Managed Pooled Funds: In accordance with the strategy, £1m of the Council's investments are held in CCLA Local Authority Property Fund an externally managed strategic pooled property fund where short-term security and liquidity are lesser considerations, and the objectives instead are regular revenue income and long-term price stability.
- 2.21 Because these funds have no defined maturity date, but are available for withdrawal after a notice period, their performance and continued suitability in meeting the Council's medium- to long-term investment objectives are regularly reviewed. Strategic fund investments are made in the knowledge that capital values will move both up and down on months, quarters and even years; but with the confidence that over a three- to five-year period total returns will exceed cash interest rates.
- 2.22 The Council had budgeted £57k income from these investments in 2022/23. Income received was £283k, whilst a further £58k has been declared and is due to be paid by April/May.
- 2.23 The DLUHC published a consultation on the IFRS 9 pooled investment fund statutory override for English authorities for fair value gains and losses on pooled investment funds which was due to expire with effect from 2023/24. The options under evaluation were to allow the override to lapse, to extend it, or to make it permanent. The override will be extended for two years and therefore remain in place for the 2023/24 and 2024/25 financial years. Under the Regulations, gains and losses resulting from unrealised fair value movements relating to treasury pooled investment funds, that otherwise must be recognised in profit or loss under IFRS 9, are not charges to the revenue account, and must be taken into an unusable reserve account.

3. FINANCIAL IMPLICATIONS

- 3.1 Other Non-Treasury Holdings and Activity - Although not classed as treasury management

activities the definition of investments in CIPFA's revised Treasury Management Code now covers all the financial assets of the Council as well as other non-financial assets which the Council holds primarily for financial return. Investments that do not meet the definition of treasury management investments (i.e. management of surplus cash) are categorised as either for service purposes (made explicitly to further service objectives) and or for commercial purposes (made primarily for financial return).

- 3.2 Investment Guidance issued by the Department for Levelling Up Housing and Communities (DLUHC) and Welsh Government also broadens the definition of investments to include all such assets held partially or wholly for financial return.
- 3.3 At the balance sheet date of 31st March 2023, the Council also held £49m of investments in directly owned property, loans to homeowners and local bodies and investments in a trading subsidiary (subject to Audit).
- 3.4 These non-treasury investments generated £2m of investment income for the Council after taking account of direct costs, representing a rate of return of 4.0%. This has typically been higher than the return earned on treasury investments to reflect the additional risks to the Council of holding such investments. However, due to higher interest rates the rate for 2022/23 is in line with treasury investments.
- 3.5 Performance Report - The Council measures the financial performance of its treasury management activities in terms of its impact on the revenue budget. The table below sets out the comparison of the impact on borrowing between budget and actuals.

Table 6: Revenue Implications of Treasury Management Activity	Budget 2022-23 £m	Actual 2022/23 £m	Variance £m
General Fund Interest Paid	£0.903	£0.665	(£0.238)
HRA Interest Paid	£2.846	£2.708	(£0.138)
General Fund Interest Received	£0.082	£0.437	(£0.355)
HRA Interest Received	£0.016	£0.06	(£0.044)
MRP	£1.730	£1.558	(£0.172)

- 3.6 The amount of the Authority's revenue budget required to be set aside for the future repayment of external borrowing is known as the Minimum Revenue Provision (MRP). This amount is calculated by reference to the Council's balance sheet as at the end of the previous financial year. The underspend on MRP relates to slippage in the capital programme in the 2021/22 financial year and less borrowing required to fund the capital spend.
- 3.7 Higher interest receivable figures reflect the higher than forecast cash balances held throughout the year and the higher interest environment. Recognising the risk posed by anticipated high interest rates we were prudent in the budget set for interest payable. However, interest rates were lower than anticipated and therefore actuals resulted in a favourable variance.
- 3.8 Compliance Report – The Finance Director reported that all treasury management activities undertaken during 2022/23 complied fully with the CIPFA Code of Practice and the Council's approved Treasury Management Strategy 2022/23.

3.9 Compliance with the authorised limit and operational boundary for external debt is demonstrated in table 7 below, and compliance with the specific investment limits is demonstrated in table 8 below.

Table 7: Debt Limits	2022/23 Maximum £m	31.3.23 Actual £m	2022/23 Operational Boundary £m	2022/23 Authorised Limit £m	Complied? Yes/No
Borrowing	£125.559	£121.486	£192.000	£197.000	Yes
Long term liabilities, PFI & Finance Leases	£0.564	£0.564	£2.000	£2.000	Yes
Total debt	£126.123	£122.050	£194.000	£199.000	Yes

3.10 Since the operational boundary is a management tool for in-year monitoring it is not significant if the operational boundary is breached on occasions due to variations in cash flow, and this is not counted as a compliance failure. Total debt did not exceed the operational boundary during 2022/23.

Table 8: Investment Limits	2022/23 Maximum	31.3.23 Actual	2022/23 Limit	Complied? Yes/No
Any single organisation, except the UK Government	£1.010m	-£0.872m	£1.6m	Yes
UK Central Government	Unlimited	Nil	Unlimited	Yes
UK Central Government Local Authorities	£9m	£9m	£3m (2years)	Yes
Secured Investments	Nil	Nil	£3m (5 years)	Yes
Banks (unsecured)	£1.010m	-£0.872m	£1.6m (unlimited)	
Any group pooled funds under the same Management (incorporates Money Market Funds and Strategic Pooled Funds)	£5m	£3.985m	£8m	Yes
Negotiable instruments held in a broker's nominee account	Nil	Nil	£5m per broker	Yes
Limit per non-UK country	Nil	Nil	£1.5m per country	Yes
Registered providers and registered social landlords (unsecured)	Nil	Nil	£3m in total	Yes
Unsecured investments with building societies	Nil	Nil	£1.5m in total (1 year)	Yes
Strategic Pooled Funds	£1m	£1m	£3m	Yes

Money Market Funds	£25m	£4.180m	£5m per fund Unlimited	Yes
Other Investments	Nil	Nil	£1m (2 years)	Yes

3.11 Treasury Management Indicators - The Council measures and manages its exposures to treasury management risks using the following indicators.

3.12 Security - The Council has adopted a voluntary measure of its exposure to credit risk by monitoring the value-weighted average credit rating of its investment portfolio. This is calculated by applying a score to each investment (AAA=1, AA+=2, etc) and taking the arithmetic average, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk.

Credit risk indicator	31.3.23 Actual	2022/23 Target	Complied?
Portfolio average credit rating	A+	A	Yes

3.13 Liquidity: The Council has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount cash available to meet unexpected payments within a rolling three-month period, and the amount it can borrow each quarter without giving prior notice.

Liquidity	31.3.23 Actual	2022/23 Target	Complied?
Liquid short-term deposits	£4.180m	£12m	No
Bank overdraft	£0.250m	£0.250m	Yes

* Liquid short-term deposit did not comply as total investments £14.180 of which £10m were long term investments with local authorities and CCLA PF. The target was set at a time when balances were previously much higher. The impact of this was not deemed significant.

3.14 Interest Rate Exposures: This indicator is set to control the Councils exposure to interest rate risk. The upper limits on the one-year revenue impact of a 1% rise or fall in interests was:

Interest rate risk indicator	31.3.23 Actual £000	22/23 Limit £000	Complied
Upper limit on one-year revenue impact of a 1% rise in interest rates	£133	£148	Yes
Upper limit on one-year revenue impact of a 1% fall in interest rates	£135	£264	Yes

3.15 The impact of a change in interest rates is calculated on the assumption that maturing loans and investment will be replaced at current rates.

3.16 Maturity Structure of Borrowing: This indicator is set to control the Councils exposure to refinancing risk. The upper and lower limits on the maturity structure of all borrowing were:

Maturity Structure of Borrowing	31.3.23 Actual	Upper Limit	Lower Limit	Complied?
Under 12 months	27%	50%	0%	Yes
12 months and within 24 months	7%	50%	0%	Yes
24 months and within 5 years	0%	60%	0%	Yes
5 years and within 10 years	7%	80%	0%	Yes
10 years and above	58%	100%	0%	Yes

3.17 Time periods start on the first day of each financial year. The maturity date of borrowing is the earliest date on which the lender can demand repayment.

3.18 Principal Sums Invested for Periods Longer than a year: The purpose of this indicator is to control the Council's exposure to the risk of incurring losses by seeking early repayment of its investments. The limits on the long-term principal sum invested to final maturities beyond the period end were:

Principal Sums Invested for Periods Longer than 365 days	2022/23 £m	2023/24 £m	2024/25 £m
Actual principal invested beyond year end	£10m	£10m	Nil
Limit on principal invested beyond year end	£12m	£12m	£12m
Complied	Yes	Yes	Yes

4. Risk Implications

4.1 As detailed within this document and the Treasury Management Strategy.

5. Legal Implications

5.1 As detailed within this document and the Treasury Management Strategy.

6. Conclusion

6.1 Overall the Council remains in line with the Treasury Management Strategy as approved in February 2023. The treasury activities continue to be monitored on a daily basis.

7. Background Papers

- Treasury Management Strategy 2023/24
- 2022/23 Outturn Reports for the General Fund and the Housing Revenue Account.
- Arlingclose updates and reports
- Current and future cashflows and loan registers
- Capital Financing Reports for GF/HRA

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

Consultations	Comment
Monitoring Officer Consultation:	
Section 151 Officer Consultation:	
Existing Council Policies:	
Equality Issues/EQIA assessment:	

Appendix A Treasury Management Prudential Indicators Q1 2023/24

1. NATIONAL CONTEXT AND ECONOMIC COMMENTARY

- 1.1 Economic background: The war in Ukraine continued to keep global inflation above central bank targets and the UK economic outlook remained relatively weak with the chance of a mild recession. The economic backdrop during the January to March period continued to be characterised by high energy and commodity prices, high inflation, and the associated impact on household budgets and spending. Central Bank rhetoric and actions remained consistent with combatting inflation. The Bank of England, US Federal Reserve, and European Central Bank all increased interest rates over the period, even in the face of potential economic slowdowns in those regions.
- 1.2 Starting the financial year at 5.5%, the annual CPI measure of UK inflation rose strongly to hit 10.1% in July and then 11.1% in October. Inflation remained high in subsequent months but appeared to be past the peak, before rising again in February. Annual headline CPI registered 10.4% in February, up from 10.1% in January, with the largest upward contributions coming from food and housing. RPI followed a similar pattern during the year, hitting 14.2% in October. In February RPI measured 13.8%, up from 13.4% in the previous month.
- 1.3 The labour market remained tight albeit with some ongoing evidence of potential loosening at the end of the period. The unemployment rate 3month/year eased from 3.8% April-June to 3.6% in the following quarter, before picking up again to 3.7% between October-December. The most recent information for the period December-February showed an unemployment rate of 3.7%.
- 1.4 Nominal earnings were robust throughout the year, with earnings growth in December-February at as 5.7% for both total pay (including bonuses) and 6.5% for regular pay. Once adjusted for inflation, however, both measures were negative for that period and have been so throughout most of the year.
- 1.5 Quarterly GDP was soft through the year, registering a 0.1% gain in the April-June period, before contracting by (an upwardly revised) -0.1% in the subsequent quarter. For the October-December period was revised upwards to 0.1% (from 0.0%), illustrating a resilient but weak economic picture. The annual growth rate in Q4 was 0.6%.
- 1.6 The Bank of England increased the official Bank Rate to 4.25% during the financial year. From 0.75% in March 2022, the Monetary Policy Committee (MPC) pushed through rises at every subsequent meeting over the period, with recent hikes of 50bps in December and February and then 25bps in March, taking Bank Rate to 4.25%. March's rise was voted by a majority of 7-2, with two MPC members preferring to maintain Bank Rate at 4.0%. The Committee noted that inflationary pressures remain elevated with growth stronger than was expected in the February Monetary Policy Report. The February vote was also 7-2 in favour of a hike, and again with two members preferring to keep Bank Rate on hold.
- 1.7 After reaching 9.1% in June, annual US inflation slowed for eight consecutive months to 6% in February. The Federal Reserve continued raising interest rates over the period with consecutive increases at each Federal Open Market Committee meetings, taking policy rates

to a range of 4.75%- 5.00% at the March meeting. From the record-high of 10.6% in October, Eurozone CPI inflation fell steadily to 6.9% in March 2023. Energy prices fell, but upward pressure came from food, alcohol, and tobacco. The European Central Bank continued increasing interest rates over the period, pushing rates up by 0.50% in March, taking the deposit facility rate to 3.0% and the main refinancing rate to 3.5%.

- 1.8 As market volatility is expected to remain a feature, at least in the near term and, as ever, the institutions and durations on the Authority's counterparty list recommended by Arlingclose remains under constant review. Local authorities remain under financial pressure, but Arlingclose continues to take a positive view of the sector, considering its credit strength to be high. Section 114 notices have been issued by only a handful of authorities with specific issues. While Arlingclose's advice for local authorities on its counterparty list remains unchanged, a degree caution is merited with certain authorities.

Appendix B

As required by the 2021 CIPFA Treasury Management Code, the Authority monitors and measures the following treasury management prudential indicators.

Liability Benchmark: This new indicator compares the Council's actual existing borrowing against a liability benchmark that has been calculated to show the lowest risk level of borrowing. The liability benchmark is an important tool to help establish whether the Council is likely to be a long-term borrower or long-term investor in the future, and so shape its strategic focus and decision making. It represents an estimate of the cumulative amount of external borrowing the Council must hold to fund its current capital and revenue plans while keeping treasury investments at the minimum level of £7m required to manage day-to-day cash flow.

Liability Benchmark	31.3.23 Actual	31.3.24 Forecast	31.3.25 Forecast	31.3.26 Forecast
Loans CFR	167.7	195.5	197.5	198.5
External Borrowing	(121.0)	(82.4)	(82.3)	(82.2)
Less: Balance sheet resources (including working capital)	(50.00)	(66.1)	(58.9)	(63.1)
Investments / (new Borrowing)	(3.3)	47.0	56.3	53.2
Plus: Liquidity allowance	7.0	7.0	7.0	7.0
Liability benchmark	124.7	136.4	145.5	142.5
<i>Existing borrowing</i>	<i>121.0</i>	<i>82.3</i>	<i>82.2</i>	<i>82.1</i>

Following on from the medium-term forecast above, the long-term liability benchmark assumes capital expenditure funded by borrowing in line with the current forecast capital programme, minimum revenue provision and income, expenditure and reserves all in line with the 2023/24 budget and forecasts.

Maturity Structure of Borrowing: This indicator is set to control the Authority's exposure to refinancing risk. The upper and lower limits on the maturity structure of all borrowing were:

Maturity Structure of Borrowing	Upper Limit	Lower Limit	30.6.23 Actual	Complied?
Under 12 months	50%	0%	28%	Yes
12 months and within 24 months	50%	0%	7%	Yes
24 months and within 5 years	60%	0%	0%	Yes
5 years and within 10 years	80%	0%	7%	Yes

10 years and above	100%	0%	57%	Yes
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Time periods start on the first day of each financial year. The maturity date of borrowing is the earliest date on which the lender can demand repayment.

Long-term Treasury Management Investments: The purpose of this indicator is to control the Authority's exposure to the risk of incurring losses by seeking early repayment of its investments. The prudential limits on the long-term treasury management limits are:

Long-term Treasury Management Investments	2023/24	2024/25	2025/26	No fixed date
Limit on principal invested beyond year end	£10m	£10m	£10m	£1m
Actual principal invested beyond year end	£6m	Nil	Nil	£1m
Complied?	Yes	Yes	Yes	Yes

Long-term investments with no fixed maturity date include strategic pooled funds, real estate investment trusts and directly held equity but exclude money market funds and bank accounts with no fixed maturity date as these are considered short-term.

Additional indicators

Security: The Authority has adopted a voluntary measure of its exposure to credit risk by monitoring the value-weighted average credit rating of its investment portfolio. This is calculated by applying a score to each investment (AAA=1, AA+=2, etc.) and taking the arithmetic average, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk.

Security	2023/24 Target	30.6.23 Actual	Complied?
Portfolio average credit rating	A	A+	Yes

Liquidity: The Authority has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount of cash available to meet unexpected payments within a rolling three-month period, it can borrow each period without giving prior notice.

Liquidity	30.6.23 Actual	2023/24 Target	Complied?
Total cash available within 3 months	£10.1m	£7m	Yes
Total sum borrowed in past 3 months without prior notice	£4m	No Target Set	N/A

Interest Rate Exposures: This indicator is set to control the Authority's exposure to interest rate risk. Bank Rate rose by 0.75% during the quarter, from the prevailing rate of 4.25% on 1st April to 5% by 30th June.

Interest rate risk indicator	2023/24 Target £000	30.6.23 Actual £000	Complied
Upper limit on one-year revenue impact of a 1% <u>rise</u> in interest rates	£50	£119	No
Upper limit on one-year revenue impact of a 1% <u>fall</u> in interest rates	(£50)	(£122)	No

The above limits were breached because they were based on lower investment and lower loan balances which reflected the Councils portfolio as at 31/12/2022 when the Treasury Management Strategy was written. The Councils investment balances have increased by 58% and loan balances have increased by 70% due to large capital projects and for cashflow purposes.

For context, the changes in interest rates during the quarter were:

	<u>31/3/23</u>	<u>30/6/23</u>
Bank Rate	4.25%	5.00%
1-year PWLB certainty rate, maturity loans	4.78%	6.22%
5-year PWLB certainty rate, maturity loans	4.31%	5.71%
10-year PWLB certainty rate, maturity loans	4.33%	5.25%
20-year PWLB certainty rate, maturity loans	4.70%	5.36%
50-year PWLB certainty rate, maturity loans	4.41%	4.95%

The impact of a change in interest rates is calculated on the assumption that maturing loans and investment will be replaced at new market rates.

Appendix C Capital Prudential Indicators Q1 2023/24

The Authority measures and manages its capital expenditure, borrowing and capital investments with references to the following indicators.

It is now a requirement of the CIPFA Prudential Code that these are reported on a quarterly basis.

The figures below have been updated in line with the 2022/23 accounts, which are still subject to audit

Capital Expenditure: The Authority has undertaken and is planning capital expenditure as summarised below.

	2022/23 actual £m	2023/24 forecast £m	2024/25 budget £m	2025/26 budget £m
General Fund services	18.0	52.2	23.4	12.3
Council housing (HRA)	11.5	10.6	9.5	9.3
Capital investments	0.2	12.8	1.0	0

The main General Fund capital projects include:

- North Quay Redevelopment
- 6 Day Market & Market Realm Redevelopment
- Wintergardens Restoration
- Conversion of former Palmers Department store to Learning Hub

HRA capital expenditure is recorded separately and includes the building and acquisition of new homes over the forecast period to replace sales under Right to Buy in line with government guidance. Programmed capital expenditure is also driven to maintaining and improve the overall stock currently held by the HRA, this is prepared over the medium term and reviewed and updated annually.

Capital investments include loans and shares made for service purposes and property to be held primarily for financial return in line with the definition in the CIPFA Treasury Management Code.

Capital Financing Requirement: The Authority's cumulative outstanding amount of debt finance is measured by the capital financing requirement (CFR). This increases with new debt-financed capital expenditure and reduces with MRP and capital receipts used to replace debt.

The actual CFR is calculated on an annual basis, but an updated CFR forecast at 30th June 2023 is

shown below.

	31.3.2023 actual	31.3.2024 forecast	31.3.2025 budget	31.3.2026 budget
General Fund services	74.3	89.4	89.6	89.7
Council housing (HRA)	91.3	93.1	94.0	94.8
Capital investments	2.1	14.3	15.1	15.0
TOTAL CFR	167.7	196.8	198.7	199.5

Gross Debt and the Capital Financing Requirement: Statutory guidance is that debt should remain below the capital financing requirement, except in the short term. The Authority has complied and expects to continue to comply with this requirement in the medium term as is shown below.

	31.3.2023 actual	31.3.2024 forecast	31.3.2025 budget	31.3.2026 budget	Debt at 30.6.2023
Debt (incl. PFI & leases)	122.0	82.8	82.6	82.4	123.0
Capital Financing Requirement	167.7	196.8	198.7	199.5	

Debt and the Authorised Limit and Operational Boundary: The Authority is legally obliged to set an affordable borrowing limit (also termed the Authorised Limit for external debt) each year and to keep it under review. In line with statutory guidance, a lower “operational boundary” is also set as a warning level should debt approach the limit.

	Maximum debt Q1 2023/24 £m	Debt at 30.6.23 £m	2023/24 Authorised Limit £m	2023/24 Operational Boundary £m	Complied? Yes/No
Borrowing	125.5	122.5	205.0	200.0	Yes
PFI and Finance Leases	0.5	0.5	2.0	2.0	Yes
Total debt	126.0	123.0	207.0	202.0	Yes

Since the operational boundary is a management tool for in-year monitoring it is not significant if the boundary is breached on occasions due to variations in cash flow, and this is not counted as a compliance failure.

Proportion of Financing Costs to Net Revenue Stream: Although capital expenditure is not charged directly to the revenue budget, interest payable on loans and MRP are charged to revenue.

The net annual charge is known as financing costs; this is compared to the net revenue stream i.e.

the amount funded from Council Tax, business rates and general government grants.

	2022/23 actual	2023/24 forecast	2024/25 budget	2025/26 budget
Financing costs (£m)	2.2	3.9	4.6	4.8
Proportion of net revenue stream	14.6%	25.3%	29.4%	35.8%