

# Planning Policy & Built Heritage Working Party



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Friday, 4 November 2022

A meeting of the **Planning Policy & Built Heritage Working Party** of North Norfolk District Council will be held in the **Council Chamber - Council Offices** on **Monday, 14 November 2022** at **10.00 am**.

At the discretion of the Chairman, a short break will be taken after the meeting has been running for approximately one and a half hours

Members of the public who wish to ask a question or speak on an agenda item are requested to notify the committee clerk 24 hours in advance of the meeting and arrive at least 15 minutes before the start of the meeting. This is to allow time for the Committee Chair to rearrange the order of items on the agenda for the convenience of members of the public. Further information on the procedure for public speaking can be obtained from Democratic Services, Tel: 01263 516108, Email: [Lauren.Gregory@north-norfolk.gov.uk](mailto:Lauren.Gregory@north-norfolk.gov.uk).

Anyone attending this meeting may take photographs, film or audio-record the proceedings and report on the meeting. Anyone wishing to do so must inform the Chairman. If you are a member of the public and you wish to speak on an item on the agenda, please be aware that you may be filmed or photographed.

Please note that Committee members will be given priority to speak during the debate of agenda items

**Emma Denny**  
**Democratic Services Manager**

**To:** Mr A Brown, Mrs P Grove-Jones, Mr N Dixon, Mr P Fisher, Ms V Gay, Mr P Heinrich, Mr R Kershaw, Mr G Mancini-Boyle, Mr N Pearce, Mr J Punchard, Dr C Stockton and Mr J Toye

All other Members of the Council for information.

Members of the Management Team, appropriate Officers, Press and Public



**If you have any special requirements in order to attend this meeting, please let us know in advance**

If you would like any document in large print, audio, Braille, alternative format or in a different language please contact us

**Chief Executive: Steve Blatch**

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## A G E N D A

**1. APOLOGIES FOR ABSENCE**

**2. PUBLIC QUESTIONS**

**3. MINUTES**

1 - 8

To approve as a correct record the Minutes of a meeting of the Working Party held on Monday 17<sup>th</sup> October 2022.

**4. ITEMS OF URGENT BUSINESS**

To determine any other items of business which the Chairman decides should be considered as a matter of urgency pursuant to Section 100B(4)(b) of the Local Government Act 1972.

**5. DECLARATIONS OF INTEREST**

9 - 14

Members are asked at this stage to declare any interests that they may have in any of the following items on the agenda. The Code of Conduct for Members requires that declarations include the nature of the interest and whether it is a disclosable pecuniary interest. Members are requested to refer to the attached guidance and flowchart.

**6. UPDATE ON MATTERS FROM THE PREVIOUS MEETING (IF ANY)**

**7. ANY OTHER BUSINESS AT THE DISCRETION OF THE CHAIRMAN AND AS PREVIOUSLY DETERMINED UNDER ITEM 4 ABOVE**

**8. COASTAL ADAPTATION SUPPLEMENTARY PLANNING DOCUMENT (SPD)**

15 - 100

**Coastal Adaptation Supplementary Planning Document (SPD)**

Summary: To inform the Planning Policy and Built Heritage Working Party of the draft Coastal Adaptation SPD in preparation for its formal public consultation.

Recommendations: **Members of the Planning Policy & Built Heritage Working Party recommend to Cabinet that the draft Coastal Adaptation Supplementary Planning Document be published for formal consultation; and**

**Delegated authority is given to the Planning Policy Manager in consultation with the Portfolio Holder, to make minor modifications and presentational or typographical amendments to the draft Coastal Adaptation Supplementary Planning Document that arise from other relevant Local Planning Authority sign-off**

**committees prior to it being published for formal consultation.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards

Contact Officer, telephone number and email:

Caroline Dodden, Senior Planning Officer – Planning Policy Team.

[Caroline.dodden@north-norfolk.gov.uk](mailto:Caroline.dodden@north-norfolk.gov.uk) 01263 516310

**9. LOCAL PLAN UPDATE (VERBAL)**

**10. EXCLUSION OF PRESS AND PUBLIC**

To pass the following resolution (if necessary):

“That under Section 100A(4) of the Local Government Act 1972 the press and public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A (as amended) to the Act.”

**11. TO CONSIDER ANY EXEMPT MATTERS ARISING FROM CONSIDERATION OF THE PUBLIC BUSINESS OF THE AGENDA**

**12. ANY OTHER URGENT EXEMPT BUSINESS AT THE DISCRETION OF THE CHAIRMAN AND AS PREVIOUSLY DETERMINED UNDER ITEM 4 ABOVE**

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## **PLANNING POLICY & BUILT HERITAGE WORKING PARTY**

**Minutes of the meeting of the Planning Policy & Built Heritage Working Party held on Monday, 17 October 2022 at the Council Chamber - Council Offices at 10.00 am**

**Committee** Cllr P Grove-Jones ( Chairman)  
**Members Present:** Cllr N Dixon Cllr V Gay  
Cllr P Heinrich Cllr N Pearce  
Cllr J Punchard

**Members also attending:** Cllr L Withington (Substitute for Cllr P Fisher)

**Officers in Attendance:** Planning Policy Manager (PPM)  
Planning Monitoring Officer (PMO)  
Senior Planning Officer (SPO)  
Democratic Services Officer (DSO)

### **12 APOLOGIES FOR ABSENCE**

Apologies for absence were received from Cllrs A Brown (Chairman), Cllr G Mancini-Boyle, Cllr P Fisher, Cllr R Kershaw, Cllr C Stockton and Cllr J Toye. The Vice Chairman, Cllr P Grove-Jones served as Chairman for the meeting. Cllr L Withington was present as a substitute for Cllr P Fisher.

### **13 PUBLIC QUESTIONS**

There were no public questions.

### **14 MINUTES**

The minutes of the Planning Policy & Built Heritage Working Party meeting held Monday 15th August 2022 were approved as a correct record.

### **15 ITEMS OF URGENT BUSINESS**

None.

### **16 DECLARATIONS OF INTEREST**

None.

### **17 UPDATE ON MATTERS FROM THE PREVIOUS MEETING (IF ANY)**

- i. The PPM advised that the Glaven Valley Rural Conservation Area consultation was being organised and would be advertised widely including within the Councils 'Outlook' magazine. He advised that a further update would be provided by the end of the year.
- ii. Cllr N Pearce stated that he had received numerous emails from concerned individuals regarding the exclusion of the Grade II listed Valley Farm and of

the nearby chalk bed stream from the Rural Glaven Valley Conservation Area Parishioners were keen to see Sharrington protected and were willing to submit supporting evidence.

- iii. The PPM encouraged members of the public to take part in the consultation once launched, and affirmed that representations would inform decision making after the consultation concluded.
- iv. Cllr N Pearce commented that whilst the Glaven Valley it was not his ward, he had been contacted by the public as a member of the working party. He confirmed he had not met with anyone on this matter, nor did he have the intention to.

## **18 ANNUAL MONITORING REPORT**

- i. The PMO introduced the Annual Monitoring report and highlighted some of the information contained therein including mandatory indicators, house price changes, new build average price comparisons and population figures which were less than expected.
- ii. The PPM added to the introductory remarks and clarified the purpose of the monitoring report, which he considered was a useful tool to assess the success of the previous Local Plan and what could be learnt from it. The principle purpose of monitoring was to establish the effectiveness of policy and to spot trends, this he argued, underpinned good quality decision making. The PPM considered the Council to be in a positive position noting that the Authority had met its housing delivery aims over the prior 20 year period, and delivered an additional 1,500 homes to those previously prescribed. Further, the Council had successfully met its annual delivery target of 400-500 dwellings per annum consistently over the last 4-5 years. With regards to affordable housing the PPM noted that it was a struggle to find the right sites, and the stressed the importance of the rural exceptions programme which, whilst resource intensive, had delivered 100 affordable dwellings in some years. He affirmed that the Council were 5<sup>th</sup> in a National League table for the delivery of rural expectations housing, commenting that this was a credit to the organisation and the flexibility built into the core strategy. He relayed the importance of regular monitoring which would inform the emerging Local Plan.
- iii. The Chairman expressed her surprise that population growth did not reach the 2011 census estimate, given the amount of housing development within the district and perception of the increased number of people relocating to the area.
- iv. The PPM advised that there were 5 key sources of information used to project population figures, including 3 sets of population and household projections from the O&S and 2 Census results. He noted that none of those reports produced the same figure and stressed the importance of examining what sits behind the figures. The PPM stated that there was no linear link between population growth and house building, in part because newly built dwellings formed a small amount of the total stock, and it was important not to disregard the other 95% of housing. The PPM noted subtle changes which were making household sizes smaller including the increase of divorce rates as well as second home ownership; which affected a significant proportion of some areas of the district. He noted that the 1.5% population growth was

very low and that normally a 5% growth per annum was to be expected. The PPM advised that there was some scepticism over the statistics as to whether the population located in the broads, but within the NNDC boundary, had been recorded within North Norfolk and not a neighbouring district. If adjusted this would account for the gap between the projected population figure and the actual figure. He noted that census results were often modified and that the data contained therein became more secure and credible over time.

- v. The Chairman noted the ageing population within the District, which had one of the oldest populations within the Country. She considered that the death rate would also be higher as a consequence.
- vi. Cllr V Gay stated that there was some evidence that longevity was dropping, and that it was clear that people were living more years in ill health.
- vii. The PPM advised that birth and death rates were around the same and effectively cancelled one another out. He noted that the pace of growth was significantly lower than projections and that this supported the Councils housing delivery approach. The PPM noted the alternate argument that constrained housing delivery would result in slower growth.
- viii. Cllr N Dixon commented on the dynamic of demographics including lifestyle, lifestyle changes, and lifestyle expectations. He acknowledged the impact on Health Services as a consequence of an increasingly elderly demographic change, and stressed the importance to provide resources which would deliver population satisfaction with changing expectations. Cllr N Dixon reflected that there were parts of the housing delivery process which the Authority could and could not control. Whilst the Council could set targets, Members did not have much influence over final delivery as this was in the hands market forces who had the greatest influence. He commended the Council in setting realistic evidence based targets, aiding to manage expectations.
- ix. The PPM reflected on the important, instrumental, role the Council had in housing delivery and acknowledged the influence of market forces. He noted the housing incentive scheme which had invigorated the market in 2011-2012 resulting in a large volume of house building, though this had not been universally supported. Outside of the Local Plan there were macro factors affecting housing delivery some years, however the PPM argued that market conditions were cyclical and other years delivered higher housing growth.
- x. Cllr J Punchard supported comments made by Cllr N Dixon, and stated that the historical data demonstrated that the Council was on target. He considered the impact of Covid on future housing needs, and noted several other factors including increased working from home, young people living with parents longer before buying as opposed to renting, changes in flat ownership were important in conjunction to the impact of Covid.
- xi. Cllr L Withington noted with interest the population figures and affirmed the influx of households moving to her ward of Sheringham due to the prevalence of home working following the pandemic. She considered this type of inward migration was a new sector of movement aside from retirees. Cllr L Withington noted that young people were moving away from the district, returning when they were more established and could better afford

housing.

- xii. Cllr N Pearce noted the imbalance between salary and house prices locally leading to local people moving away from the district, something he considered to be an uprooting of local heritage. He supported the provision of more affordable housing to address the growing affordability gulf.
- xiii. The PMO continued to introduce the Annual Monitoring report included within the agenda for the two periods 2020/2021 – 2021/2022. He noted that within the statistics for 2020/2021 housing delivery was exceptionally high due to the Fakenham development and reiterated comments from the PPM that housing delivery fluctuated between years.
- xiv. The PPM advised Members that there were two figures stated with regards to housing delivery for the emerging Local Plan, the first was a minimum number for 9,600 dwellings which would meet the projected population trajectory, the other 12,096 was for the number of dwellings the Local Plan was capable to deliver. The difference between the two figures was considered to be important to the strategy, building in failure contingency, satisfying the Planning Inspectorates expectation for a 10% contingency buffer. He advised that some of the growth would take place outside of the period ending 2036, and noted this included the large development at North Walsham.
- xv. The PMO continued to introduce the Annual Monitoring report and noted the changes in population demographics with a projected 45% of over 65's expected by 2036. He advised that medium property price within the district was 11.44x higher than the medium gross annual income within the district. The PMO commented that the final report would provide further contextual details and would be published by the end of the year.
- xvi. Cllr L Withington thanked Officers for their report and asked if changes in housing stock was being considered. She noted of the large volume of applications within her ward pertained to extensions or garage conversions, as people could not afford to buy a larger property. This had resulted in a reduction in the amount of affordable first time homes. Cllr L Withington noted this matter had been considered by the North Norfolk Town and Parish Forum and polling detailed that some areas of the district, particularly those within National Park, were considered to have lost all first time buyer stock.
- xvii. Cllr V Gay praised the Officers report and the clarity provided. She questioned the garden plot figure provided for 2020/2021 and 2021/2022 noting that it was the same.
- xviii. The PPM advised that this was the correct figure for each year, and it was not an administrative error. In response to question from the Chairman, the PPM stated that 50% of growth was delivered outside of allocated development sites and that small scale development was critical to housing delivery.
- xix. Cllr P Heinrich considered 2 issues arising from the statistics. First, the increasing large number of elderly residents and the need to ensure appropriate type of development was provided to suit need. Second, the need of younger people and families which must be also be considered a priority. He acknowledged the growing numbers of people working from



home but considered that good quality fibre internet was required to support this type of working.

- xx. The PPM advised that the emerging Local Plan, unlike the prior Local Plan, prescribed within larger scale housing developments factors including, broadband, house sizes, bedroom numbers, and ensured elderly person accommodation was provided as percentage of the total overall development. He stated it was not just the number of dwellings built which was critical but also the type.
- xxi. Cllr N Dixon affirmed that it was important to have appropriate apportionment to enable people to get onto the housing ladder and so that they could continue to make progressions ensuring that the market was not static. He noted that people wished to migrate to the district for the better quality of life offered and that this was made easier by working from home options. He commented that it was important when considering planning applications and housing development that the character of the area was considered, and that work needed to be done to identify those properties which would be acceptable for garden development, and those which were not. Such work would better inform and ensure robust decision making.
- xxii. The PPM stated that the North Norfolk Design guide was the vehicle for this work, and agreed the need for robust guidance.
- xxiii. Cllr V Gay acknowledged the Council had created an award winning design guide which had been regularly utilised at Development Committee. She was uncertain where the 2019 draft was at with respect of its adoption.

**19 ANY OTHER BUSINESS AT THE DISCRETION OF THE CHAIRMAN AND AS PREVIOUSLY DETERMINED UNDER ITEM 4 ABOVE**

None.

**20 LOCAL PLAN AND NEIGHBOURHOOD PLAN UPDATE ( VERBAL)**

- i. The PPM provided a verbal update on the draft Local Plan, the aim of which was to submit early in the New Year. He advised that the Regulation-19 consultation exercise had taken place earlier in the year and that the team were generating a condensed document detailing responses. Such documentation would be provided as soon as possible, with ample time for Members to fully consider ahead of its inclusion as an Agenda Item. The PPM stated that complications had arisen as a consequence of Nutrient Neutrality (NN) guidance but that he had taken the view that it was in the best interest of the Authority to submit the Local Plan for examination within this administration. He contended that the Council were in a better position with NN than it had been 6 months prior and that there was greater understanding of the boundary and consequences. Importantly, cost implications were better understood which would aid in the creation and implementation of mitigation strategies. The PPM stated that whilst in abeyance with NN the team were continuing to update the viability assessment across the district including the cost assessment, green infrastructure strategies, NN mitigation, elderly person accommodation and others which would have a significant impact on the cost of development. Additional costs for labour and materials had largely been offset by building

value increases.

- ii. The Chairman considered the implication regarding settlement development distribution was reasonably fluid due to NN, she expressed some concern about housing delivery.
- iii. The PPM stated that he felt it was the right strategy to submit the draft Local Plan and affirmed that he felt the plan was sound. He acknowledged that if Members contended that changes were required following receipt of representations that growth in one areas was too much, but that the overall housing delivery figure was correct, modifications could be made to redistribute. Critically, issues would arise if significant changes were requested by Members, which would affect the timetable of delivery and would result in the need for further consultation.
- iv. Cllr J Punchard expressed his support to process with submitting the draft Local Plan within the current administration. He considered that serving Members were more knowledgeable of the process and that new Members would likely require extensive training to become more cognizant. Cllr J Punchard asked if the dates specified in the plan could be pushed back, rather than concluding in 2036.
- v. The PPM stated that the moving of the plan period was theoretically possible but would need to be grounded within a received representation, which it had been. He noted that in pushing back the end date, the data used to inform decisions was less reliable.
- vi. Cllr N Dixon enquired when the examination period would take place, as he was mindful of election period in 2023.
- vii. The PPM stated that should the submission of the plan occur early 2023 that he would reasonably expect an Inspector to be appointed and for preliminary hearings to start by September 2023. He advised that most examinations of sound plans took between 12 and 18 months.
- viii. Cllr N Dixon agreed with submitting the draft Local Plan within the current administration. He contended that costs for labour and materials were still increasing and that the cost implications of NN were still unclear and in need of refining. Further, Cllr N Dixon contended that there was still a significant issue around site viability and delivery.
- ix. The PPM agreed that there would be a residual risk of NN if the draft Local Plan was submitted within the specified timeframe, and that a mitigation strategy and full costings would be a work in progress till around May 2023, at the earliest. He stated that following revisions of the NN affected catchment map, areas of substantial growth were now not affected by NN, and those which were would be revisited through redistribution of development. He stated that he did not see the value in delaying submission.
- x. Cllr N Dixon expressed the need to ensure appropriate checks and balances.
- xi. Cllr V Gay requested that if the Regulation 19 responses document was to be lengthy, that Members were ensured enough time to read properly.
- xii. The PPM agreed that the document would be circulated with plenty of time

and that the team would condense the information to key issues, avoiding duplications. He advised that the submission Local Plan would need to be agreed by Full Council.

- xiii. Cllr J Punchard enquired where NNDC were at in comparison to other Local Councils.
- xiv. The PPM stated that all were at various stages, and noted that Greater Norwich had submitted their plan but were struggling to get it through examination due to issues surrounding NN and travellers. He did not consider that the outcome from the Greater Norwich plan would be received before submission by NNDC, and therefore there was nothing to gain by waiting and obtaining additional information.

## **21 INFRASTRUCTURE DELIVERY PLAN**

- i. The SPO introduced the Infrastructure Delivery Plan (IDP) outlined in the Agenda Pack, and noted that the full extensive document was still at the draft stage. The contents of the IDP were based on the Local Plan and would seek to benefit and promote the aspirations of the Local Plan. Critical, essential and desirable elements were set out on p.16 of the report. Other considerations included electric vehicle charging points, costs and the provision of flood lighting, GI/RAMS, amongst others. He reiterated that this was a live document at the draft stage.
- ii. Cllr P Heinrich was pleased that the North Walsham Link was included within the IDP, something he considered to be critical for the town and area. He enquired if the whole road was to be encompassed.
- iii. The SPO affirmed that the North Walsham Link was considered critical to the plan.
- iv. Cllr N Dixon expressed his disappointment that the full draft document had not been provided to Members prior to meeting nor was it available at the meeting by consequence of unforeseen technical issues. He affirmed that he was very interested to see the IDP, and considered its significant importance to the delivery of the Local Plan. He commented on his frustration that the Working Group had not had sight of its progress for some time, and it was especially critical Members review the document at this late stage of the process so close to submission.
- v. The SPO advised that the was draft document was not at a stage in which Officers felt comfortable to share publicly, noting that discussions were taking place in a public meeting which was being livestreamed.
- vi. Cllr N Dixon stated that it was essential that a tangible document be provided to Members so that they may determine where the IDP sits alongside the Local Plan. He reiterated that this was late in the process and that it was a key weakness in the past that the appropriate infrastructure had not been provided at the appropriate time. Cllr N Dixon reiterated his disappointment and stated that he would draw confidence if he were able to fully consider the document.
- vii. Cllr L Withington noted that a briefing had been held the week prior for the

Coastal Transition Accelerator Programme (CTAP) regarding the issue of coastal erosion and asked if the IDP considered this matter.

- viii. The PPM advised that the IDP related to the infrastructure required to support the Local Plan and not broader concerns. He affirmed that he did not expect Members to agree to recommend the IDP at this stage, advising that this was an introductory item which was for information only. The PPM stated that there was a need for further debate on this matter at future meetings once Members were in possession of the full set of papers.
- ix. The Chairman requested that such information be provided before 2023, noting that the Local Plan had been going on for a number of years.
- x. Cllr N Dixon asked if an early draft may be provided before its inclusion on the agenda.
- xi. The DSO advised that information could be shared on the screen following a few minutes recess. Members considered that they required IDP information in advance of the meeting, and not simply at the meeting, so that they may have time to fully consider.
- xii. Cllr J Punchard noted S.2.2 (telecommunication) within the Officer's report which he considered to be critical to housing delivery, but commented that he could not see further references to it within the document with regards to the delivery schedule.
- xiii. The PPM reiterated the need for this item to be brought back before Members once they had been afforded time to consider the IDP documents.
- xiv. Cllr N Pearce supported comments raised by Cllr N Dixon and expressed the need for infrastructure to support the delivery and viability of housing within the district. He agreed that detailed information was required for Members to make an assessment.
- xv. Cllr P Heinrich acknowledged the importance of broadband connectivity and transportation issues needed to be addressed in the IDP, reflecting on the situation in North Walsham.

**22 EXCLUSION OF PRESS AND PUBLIC**

None.

**23 TO CONSIDER ANY EXEMPT MATTERS ARISING FROM CONSIDERATION OF THE PUBLIC BUSINESS OF THE AGENDA**

None.

**24 ANY OTHER URGENT EXEMPT BUSINESS AT THE DISCRETION OF THE CHAIRMAN AND AS PREVIOUSLY DETERMINED UNDER ITEM 4 ABOVE**

None.

The meeting ended at 12.10pm

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Chairman

## Registering interests

Within 28 days of becoming a member or your re-election or re-appointment to office you must register with the Monitoring Officer the interests which fall within the categories set out in **Table 1 (Disclosable Pecuniary Interests)** which are as described in "The Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012". You should also register details of your other personal interests which fall within the categories set out in **Table 2 (Other Registerable Interests)**.

**"Disclosable Pecuniary Interest"** means an interest of yourself, or of your partner if you are aware of your partner's interest, within the descriptions set out in Table 1 below.

**"Partner"** means a spouse or civil partner, or a person with whom you are living as husband or wife, or a person with whom you are living as if you are civil partners.

1. You must ensure that your register of interests is kept up-to-date and within 28 days of becoming aware of any new interest, or of any change to a registered interest, notify the Monitoring Officer.
2. A 'sensitive interest' is as an interest which, if disclosed, could lead to the councillor, or a person connected with the councillor, being subject to violence or intimidation.
3. Where you have a 'sensitive interest' you must notify the Monitoring Officer with the reasons why you believe it is a sensitive interest. If the Monitoring Officer agrees they will withhold the interest from the public register.

## Non participation in case of disclosable pecuniary interest

4. Where a matter arises at a meeting which directly relates to one of your Disclosable Pecuniary Interests as set out in **Table 1**, you must disclose the interest, not participate in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to disclose the nature of the interest, just that you have an interest. Dispensation may be granted in limited circumstances, to enable you to participate and vote on a matter in which you have a disclosable pecuniary interest.
5. Where you have a disclosable pecuniary interest on a matter to be considered or is being considered by you as a Cabinet member in exercise of your executive function, you must notify the Monitoring Officer of the interest and must not take any steps or further steps in the matter apart from arranging for someone else to deal with it

## Disclosure of Other Registerable Interests

6. Where a matter arises at a meeting which **directly relates** to one of your Other Registerable Interests (as set out in **Table 2**), you must disclose the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting but otherwise must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to disclose the nature of the interest.

## Disclosure of Non-Registerable Interests

7. Where a matter arises at a meeting which **directly relates** to your financial interest or well-being (and is not a Disclosable Pecuniary Interest set out in Table 1) or a financial interest or well-being of a relative or close associate, you must disclose the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting. Otherwise you must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to disclose the nature of the interest.
8. Where a matter arises at a meeting which **affects** –
  - a. your own financial interest or well-being;
  - b. a financial interest or well-being of a relative, close associate; or
  - c. a body included in those you need to disclose under Other Registrable Interests as set out in **Table 2**

you must disclose the interest. In order to determine whether you can remain in the meeting after disclosing your interest the following test should be applied

9. Where a matter **affects** your financial interest or well-being:
  - a. to a greater extent than it affects the financial interests of the majority of inhabitants of the ward affected by the decision and;
  - b. a reasonable member of the public knowing all the facts would believe that it would affect your view of the wider public interest

You may speak on the matter only if members of the public are also allowed to speak at the meeting. Otherwise you must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation.

If it is a 'sensitive interest', you do not have to disclose the nature of the interest.

10. Where you have a personal interest in any business of your authority and you have made an executive decision in relation to that business, you must make sure that any written statement of that decision records the existence and nature of your interest.

**Table 1: Disclosable Pecuniary Interests**

This table sets out the explanation of Disclosable Pecuniary Interests as set out in the [Relevant Authorities \(Disclosable Pecuniary Interests\) Regulations 2012](#).

<b>Subject</b>	<b>Description</b>
<b>Employment, office, trade, profession or vocation</b>	Any employment, office, trade, profession or vocation carried on for profit or gain. [Any unpaid directorship.]
<b>Sponsorship</b>	Any payment or provision of any other financial benefit (other than from the council) made to the councillor during the previous 12-month period for expenses incurred by him/her in carrying out his/her duties as a councillor, or towards his/her election expenses. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
<b>Contracts</b>	Any contract made between the councillor or his/her spouse or civil partner or the person with whom the

	<p>councillor is living as if they were spouses/civil partners (or a firm in which such person is a partner, or an incorporated body of which such person is a director* or a body that such person has a beneficial interest in the securities of*) and the council —</p> <p>(a) under which goods or services are to be provided or works are to be executed; and</p> <p>(b) which has not been fully discharged.</p>
<b>Land and Property</b>	<p>Any beneficial interest in land which is within the area of the council.</p> <p>'Land' excludes an easement, servitude, interest or right in or over land which does not give the councillor or his/her spouse or civil partner or the person with whom the councillor is living as if they were spouses/civil partners (alone or jointly with another) a right to occupy or to receive income.</p>
<b>Licenses</b>	<p>Any licence (alone or jointly with others) to occupy land in the area of the council for a month or longer</p>
<b>Corporate tenancies</b>	<p>Any tenancy where (to the councillor's knowledge)—</p> <p>(a) the landlord is the council; and</p> <p>(b) the tenant is a body that the councillor, or his/her spouse or civil partner or the person with whom the councillor is living as if they were spouses/civil partners is a partner of or a director* of or has a beneficial interest in the securities* of.</p>
<b>Securities</b>	<p>Any beneficial interest in securities* of a body where—</p> <p>(a) that body (to the councillor's knowledge) has a place of business or land in the area of the council; and</p> <p>(b) either—</p> <p>(i) the total nominal value of the securities* exceeds £25,000 or one hundredth of the total issued share capital of that body; or</p> <p>(ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the councillor, or his/her spouse or civil partner or the person with whom the councillor is living as if they were</p>



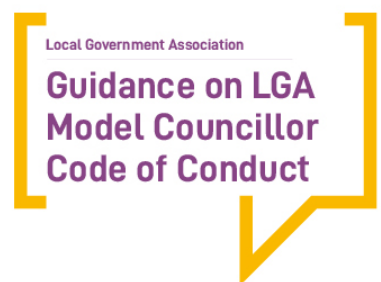
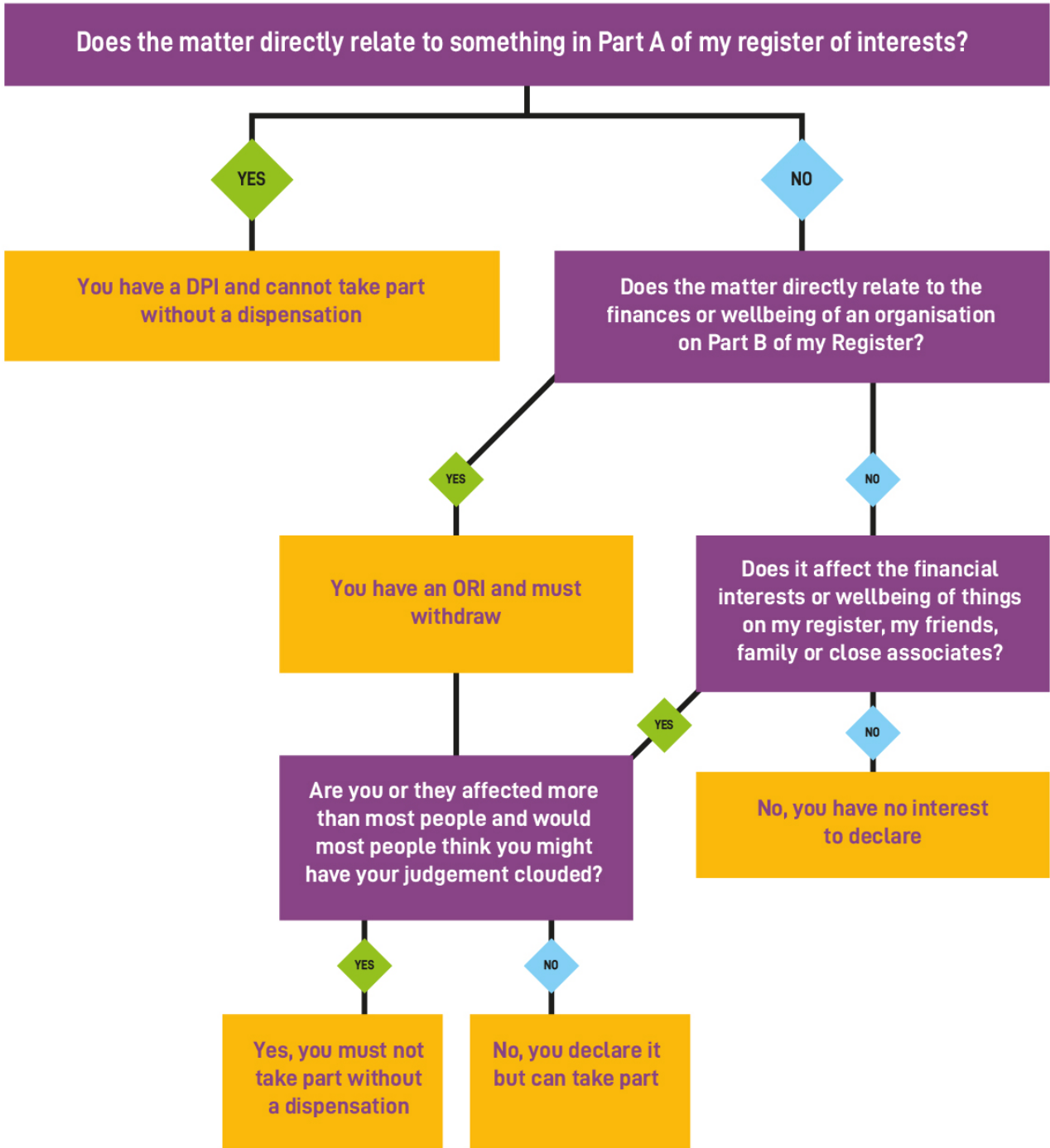
	spouses/civil partners has a beneficial interest exceeds one hundredth of the total issued share capital of that class.
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\* 'director' includes a member of the committee of management of an industrial and provident society.

\* 'securities' means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000 and other securities of any description, other than money deposited with a building society.

**Table 2: Other Registrable Interests**

<p>You have a personal interest in any business of your authority where it relates to or is likely to affect:</p> <ul style="list-style-type: none"> <li>a) any body of which you are in general control or management and to which you are nominated or appointed by your authority</li> <li>b) any body <ul style="list-style-type: none"> <li>(i) exercising functions of a public nature</li> <li>(ii) any body directed to charitable purposes or</li> <li>(iii) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union)</li> </ul> </li> </ul>
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## Coastal Adaptation Supplementary Planning Document (SPD)

**Summary:** To inform the Planning Policy and Built Heritage Working Party of the draft Coastal Adaptation SPD in preparation for its formal public consultation.

**Recommendations:**

**Members of the Planning Policy & Built Heritage Working Party recommend to Cabinet that the draft Coastal Adaptation Supplementary Planning Document be published for formal consultation; and**

**Delegated authority is given to the Planning Policy Manager in consultation with the Portfolio Holder, to make minor modifications and presentational or typographical amendments to the draft Coastal Adaptation Supplementary Planning Document that arise from other relevant Local Planning Authority sign-off committees prior to it being published for formal consultation.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer, telephone number and email:	
Caroline Dodden, Senior Planning Officer – Planning Policy Team. <a href="mailto:Caroline.dodden@north-norfolk.gov.uk">Caroline.dodden@north-norfolk.gov.uk</a> 01263 516310	

### 1. Background

- 1.1 North Norfolk District Council (NNDC) in partnership with East Suffolk Council (ESC), Great Yarmouth Borough Council (GYBC), the Broads Authority, and the shared Coastal Partnership East team (CPE) has prepared a draft Coastal Adaptation SPD.
- 1.2 The purpose of the draft SPD is to provide guidance on the implementation of the aligned policy approaches along the coast and to take a holistic (whole coast) approach, which follows from the Statement of Common Ground on Coastal Zone Planning agreed between the partnership authorities in September 2018. In doing so, the SPD will ensure planning guidance is up to date, aid the interpretation and delivery of planning policies, and provide case study examples of coastal adaptation best practice.
- 1.3 Throughout the preparation of the draft SPD a steering group comprised of officers from the partnership authorities and the shared Coastal Partnership

East team has met regularly to consider the consultation responses and draft the SPD. An initial consultation regarding the proposed subjects and structure was undertaken in the Autumn of 2020. This work has now progressed and culminates in the draft SPD, ahead of final consultation.

- 1.4 The purpose of this report is to seek the Council's authority to consult on the draft SPD. At this stage, it is not anticipated that any further substantive changes will be necessary prior to consultation. However, delegated authority is sought should any minor amendments and clarifications be required; noting that such amendments will also have to be agreed through the steering group.

## **2. Draft Coastal Adaptation Supplementary Planning Document (SPD)**

- 2.1 The draft SPD, attached at Appendix 1, supports the implementation of planning policies relating to coastal adaptation in the following local planning authorities:

- ESC (Suffolk Coastal Local Plan [2020] and Waveney Local Plan [2019])
- GYBC (Local Plan Part 1 [2015] and Local Plan Part 2 [2021])
- NNDC (Core Strategy [2008]) and emerging Local Plan
- Broads Authority (The Broads Local Plan [2019])

- 2.2 Guidance provided in the draft SPD focusses on the potential opportunities for coastal adaptation as set out in the relevant policies of the above adopted and emerging Local Plans, including development in the Coastal Change Management Area (CCMA), rollback and relocation of buildings and infrastructure at risk to coastal change now and in the future, and enabling development to support coastal adaptation projects.

- 2.3 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, and as signatories to the Coastal Concordat for England. The draft SPD is a further example of the partnership authorities taking a proactive approach to ICZM to ensure individuals and organisations at risk from coastal change are aware of the risks and can take action to adapt to the risks.

- 2.4 An SPD cannot create new or amend existing or emerging planning policies, nor can it prescribe that particular areas of land be developed for particular uses; this is the role of the wider development plans of each local planning authority (LPA). The purpose of the SPD, therefore, is to provide guidance on the accurate interpretation of planning policy and aid the implementation of relevant policies. When adopted, the SPD will be a material consideration in determining planning applications.

- 2.5 The draft SPD aims to provide useful guidance for a range of scenarios, but it will not be possible to address the complexity of issues for every possible

scenario. As with all coastal related development projects, early engagement with the LPA and CPE will always be beneficial to manage risks to life and property in a timely manner.

2.6 The scale of the draft SPD, in covering the coast from Holkham in North Norfolk to Felixstowe in East Suffolk, requires consideration of the draft SPD by a number of members and through a number of committees, as follows:

- ESC: Local Plan Working Group
- Broads Authority: Planning Committee and Broads Authority
- GYBC: Local Plan Working Party, Executive Leadership Team and Policy & Resources Committee
- NNDC Planning Policy & Built Heritage Working Party and NNDC Cabinet

The aim is for the consultation to commence in January 2023 following this sign-off procedure.

### **3. Supporting Documents to the draft Coastal Adaptation SPD**

3.1 The draft SPD is supported by a Consultation Statement, which sets out the representations submitted to the initial consultation (4 September 2020 - 16 October 2020), the main issues raised, the partnership response to each representation, and identifies changes made to the initial draft SPD as a result of representations. This initial consultation, to which 288 comments were received, has been invaluable in shaping the draft SPD.

3.2 A Strategic Environmental Assessment Screening Opinion has been undertaken and concluded that a full Strategic Environmental Assessment is not necessary. A Habitats Regulations Assessment Screening Opinion has also been undertaken and concluded that the draft SPD will not lead to likely significant effects on protected Habitat sites. These conclusions have been considered and agreed with the statutory bodies (Environment Agency, Historic England, and Natural England).

3.3 An Equality Impact Assessment Screening Opinion has been undertaken and concluded that the draft SPD would have no differential negative impacts on those with protected characteristics.

3.4 The draft SPD has been produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

3.5 The consultation on the draft SPD will be carried out in accordance with the Statements of Community Involvement of the respective local authorities.

3.6 The formal consultation will include all of the above supporting documents.

### **4. Recommendations**

- 4.1 Members of the Planning Policy & Built Heritage Working Party recommend to Cabinet that the draft Coastal Adaptation Supplementary Planning Document be published for formal consultation; and

Delegated authority is given to the Planning Policy Manager in consultation with the Portfolio Holder, to make minor modifications and presentational or typographical amendments to the draft Coastal Adaptation Supplementary Planning Document that arise from other relevant Local Planning Authority sign-off committees prior to it being published for formal consultation.

## **5. Legal Implications and Risks**

- 5.1 The Council must produce planning documents, which comply with various regulatory and legal requirements and in determining its policy approaches, must be justified and underpinned by up to date and proportionate evidence,. This includes the application of a consistent methodology which takes account of public feedback and national policy and guidance.
- 5.2 The Coastal SPD, has been prepared under the terms of the Planning and Compulsory Purchase Act 2004 and regulation 11-16 of the Town and Country Planning ((Local Planning) (England) Regulations 2012. The statutory process requires records of consultation feedback and a demonstration of how this has informed plan making.

## **6. Financial Implications and Risks**

- 6.1 Failure to undertake plan preparation in accordance with the regulations is likely to render challenge and result in less weight being given to the evidence documents and would result in further officer resources and associated costs.

## **Appendices**

Appendix 1 - Draft Coastal Adaptation Supplementary Planning Document

# Draft Coastal Adaptation Supplementary Planning Document



October 2022

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# 1 INTRODUCTION

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

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

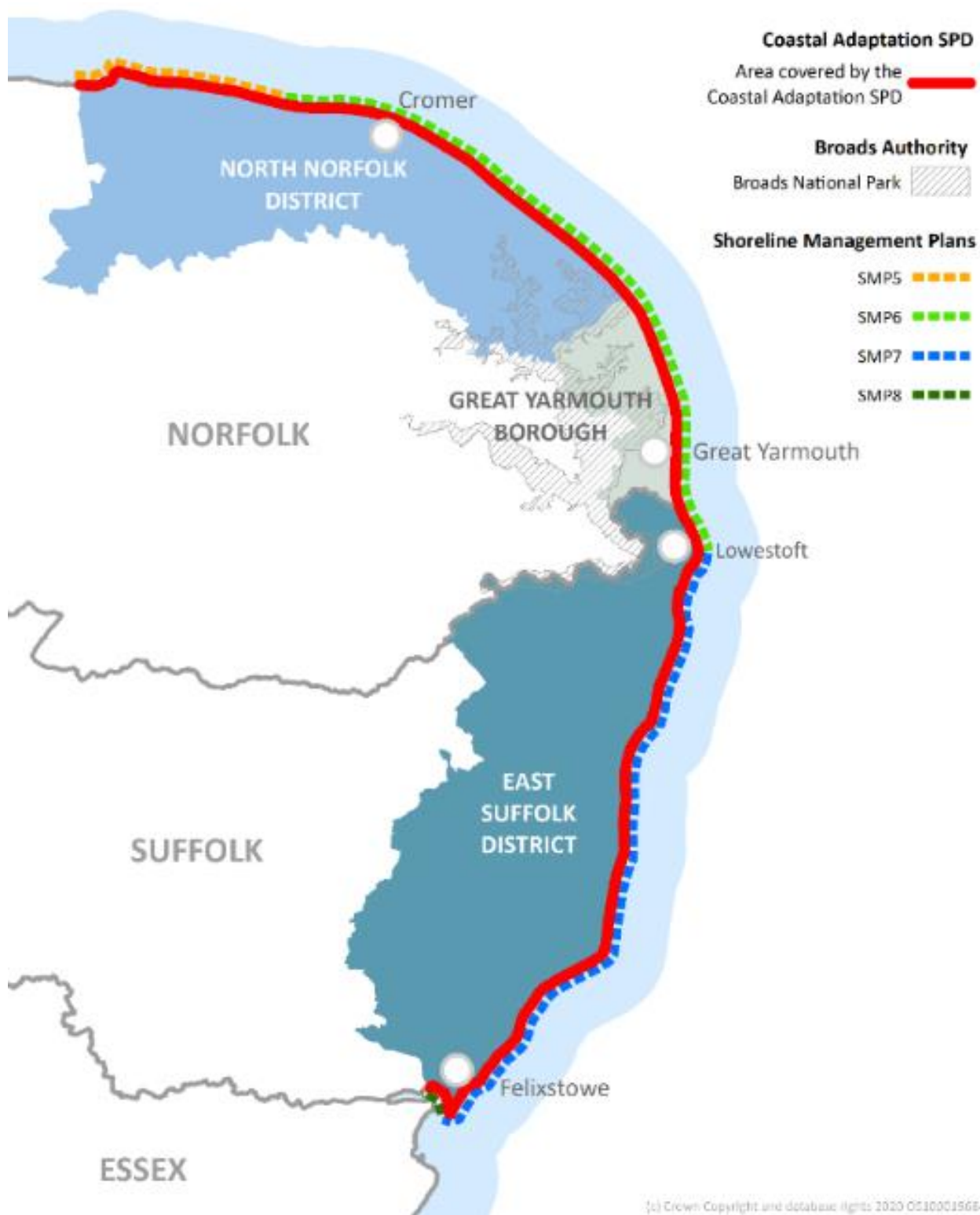


Figure 1 - The area to which the SPD applies

## 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 is and will 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 bedrock is today covered by glacial sands, silts, clays and gravels deposited and shaped through the action of ice and meltwater over the past 2 million years. Over the last 10,000 years following the last ice age, the sea level has risen and the East Anglian coast, as is recognisable today, was formed.

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 (growth of land at the coast) of the coast occurs, which can present a variety of challenges and opportunities for coastal communities, and the environment. Coastal processes affect the coast in a variety of ways and detailed geomorphology and coastal processes for specific sections of the coast are set out in our Shoreline Management Plans<sup>2</sup> (SMP).

### 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.

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

- 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, shops 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 coast protection. Sediment generally moves from north to south along the shoreline and near shore, although this can vary locally. Beaches are an important aspect of coastal protection and a beach with high levels of materials is essential for many of the coastal management structures whilst also providing natural protection to cliffs. Slowing the movement of sediment through the use of coastal structures or other interventions (e.g. beach replenishment) can help keep or restore beaches. However, coastal protection can also deprive downdrift sections of the coast of sediment, which leads to increased wave impact on coastal structures and cliff erosion. Not only do the coastal processes affect the benefits we take from the coast, but the ways in which we manage the coast also have a fundamental impact on coastal processes.
- 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 is and will climate change affect the coast?

- 2.9 The risks from climate change enhanced coastal erosion are recognised in the UK Climate Change Risk Assessment (2022)<sup>3</sup>, the Government’s National Flood and Coastal Erosion Risk Management Policy Statement (2020)<sup>4</sup>, the Environment Agency’s National Flood and Coastal Erosion Risk Management Strategy (2020)<sup>5</sup>, and the Committee on Climate Change’s ‘Managing the Coast in a Changing Climate’ report (2018)<sup>6</sup>. 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, to for example degradation through storm surge damage, is also a key impact.
- 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.



Stormy sea at Gorleston Harbour looking towards Great Yarmouth

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

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

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

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

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.
- 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.

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. 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 England<sup>7</sup>.
- 3.2 This chapter seeks to provide an overview of coastal management and planning policy at the national, local and neighbourhood scales, whilst recognising that the complexity and scale of involvement from a number of organisations and individuals cannot be neatly captured in one chapter. For this reason, Appendix 2 (Organisation Roles & Responsibilities) seeks to support this chapter and sets out the various roles, permissive powers and responsibilities of the key organisations that engage in coastal management and planning.

## National Policy and Guidance

- 3.3 The Government's Flood and Coastal Erosion Risk Management Policy Statement<sup>8</sup> sets out the government's long-term ambition to create a nation more resilient to future flood and coastal erosion risk, reducing the risk of harm to people, the environment and the economy. The Environment Agency's Flood and Coastal Erosion Risk Management Strategy<sup>9</sup> provides a framework for guiding the operational activities and decision making of practitioners supporting the direction set by government policy. The key objectives of both the Government's Policy Statement and the Environment Agency's Strategy are to ensure existing and future places and infrastructure are resilient to coastal change and that everyone understands the risks of coastal change, their responsibilities and how to take action. Clearly set out within both documents is the importance of collaborative working to ensure the key policy objectives are met.
- 3.4 The Environment Agency (the Agency) is a non-departmental public body with a wide range of responsibilities, which includes taking a strategic overview of the management of coastal erosion. This strategic overview role allows the Agency to provide leadership for the management of coastal change including where other risk management authorities have operational responsibilities, thereby helping

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

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

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



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)<sup>10</sup>, which sets the Government's planning policies at the national level. Local Plans, which set the planning policies for LPA areas, must be consistent with the policies set out in the NPPF to be deemed 'sound' and therefore capable of being adopted and used to determine planning applications across LPA areas. Thus, Local Plan policies must be consistent with the Government's ICZM approach.

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 identified in plans as likely to be affected by physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion.

3.7 The Planning Practice Guidance for Flood Risk and Coastal Change<sup>11</sup> 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 planning<sup>12</sup> is governed by the Government's UK Marine Policy Statement (MPS)<sup>13</sup> and the Marine Management Organisation's (MMO) Marine Plans. The MPS provides the national framework for the preparation of Marine Plans and decision making affecting the marine environment, while Marine Plans provide detailed policy and spatial guidance for an area and help ensure that decisions within a plan area contribute to delivery of UK, national and any area specific policy objectives. The MPS and Marine Plans are managed in an integrated and holistic way, in line with the principles of ICZM. The Marine Plans relevant to the SPD area are:

- East Inshore and Offshore Marine Plans (2014)<sup>14</sup>
- South East Inshore Marine Plan (2021)<sup>15</sup>

3.9 A marine licence may be required for any relevant developments<sup>16</sup> which may impact the marine environment, such as coastal risk management structures.

3.10 The coast is also home to a large number of natural and historic environment designations, from large scale Special Areas of Conservation to small listed buildings, and across the terrestrial and marine planning realms. These designations are often susceptible to coastal change which can result in loss of

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<sup>10</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/100575/9/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/100575/9/NPPF_July_2021.pdf)

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

<sup>12</sup> More information about UK marine planning is available here: [Explore marine plans - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/explore-marine-plans)

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

<sup>14</sup>[East Marine Plans - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/east-marine-plans)

<sup>15</sup>[The South East Marine Plan Documents - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/south-east-marine-plan-documents)

<sup>16</sup> 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/guidance/explore-marine-plans)

part of all of these assets, or conversely, can be an integral part of their designation as is the case with geologically important cliff features. Natural England and Historic England have important statutory roles in supporting the continued conservation of environmental designations and heritage assets, respectively.

## Local Policy

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 SMP policies include:

- To avoid the loss of life,
- To increase resilience to coastal change, helping to protect households and the local economy,
- To contribute to a sustainable and integrated approach to land use planning,
- To support adaptation by the local coastal communities,
- To avoid damage to and enhance the natural and historic environments,
- To maintain and improve landscape designations and features, and
- To reduce reliance on coastal risk management structures.

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,
- 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<sup>17</sup> 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.

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



Sea defences/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 and long-term implications for managing the coast. The eastern half of SMP5 (Hunstanton to Kelling Hard)<sup>18</sup>, SMP6 (Kelling Hard to Lowestoft Ness)<sup>19</sup>, SMP7 (Lowestoft Ness to Felixstowe Landguard Point)<sup>20</sup>, and the northern most point of SMP8 (Landguard Point to Two Tree Island)<sup>21</sup> cover the coastal area to which this SPD relates. As key sources of evidence SMPs are integral to the formulation of Local Plan policy in respect of the coast, in particular the identification of the CCMA.
- 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.

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<sup>18</sup> [EACG \(East Anglian Coastal Group\) - SMP 5](#)

<sup>19</sup> [EACG \(East Anglian Coastal Group\) - SMP 6](#)

<sup>20</sup> [Shoreline Management Plan 7 \(suffolksmp2.org.uk\)](#)

<sup>21</sup> [EACG \(East Anglian Coastal Group\) - SMP 8](#)



Eroded cliffs at East Runton

- 3.16 The partnership authorities each have their own Local Plans with their own coastal planning policies. The partnership authorities' adopted Local Plans are:
- East Suffolk Council<sup>22</sup> Suffolk Coastal Local Plan (adopted 2020)<sup>23</sup>
  - East Suffolk Council Waveney Local Plan (adopted 2019)<sup>24</sup>
  - Great Yarmouth Local Plan Part 1 (adopted 2015)<sup>25</sup>
  - Great Yarmouth Local Plan Part 2 (adopted 2021)<sup>26</sup>
  - North Norfolk Core Strategy (adopted 2008)<sup>27</sup>
  - The Broads Local Plan (adopted 2019)<sup>28</sup>
- 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 draft SPD is intended to also provide guidance in relation to the emerging North Norfolk District Council Local Plan<sup>29</sup>, 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, most frequently undertaken by parish councils and applying to their designated areas. Neighbourhood Plans must be in general conformity with the strategic policies set out in the relevant Local Plan/s and must have regard

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

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

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

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

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

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

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

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

to the NPPF. The coastal management policies within our Local Plans are strategic policies, and therefore the preparation of Neighbourhood Plans, where they seek to address coastal planning matters, should not be in isolation but act to further support our ICZM approach.

## Local Plan policies

- 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:
- ESC Suffolk Coastal Local Plan policy SCLP9.3 (Coastal Change Management Area)
  - ESC Waveney Local Plan policy WLP8.25 (Coastal Change Management Area)
  - GYBC Local Plan Part 2 policy GSP4 (New Development in Coastal Change Management Areas)
  - NNDC Core Strategy policy EN11 (Coastal Erosion), the CCMA is referred to as the Coastal Erosion Constraint Area. Emerging NNDC Local Plan policy CC5 (Coastal Change Management) is also relevant as the emerging plan has reached an advanced stage.
- 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. NNDC Core Strategy policy EN11 (Coastal Erosion) does not refer to CEVA by name but does require evidence of the vulnerability of proposed development to coastal change to support planning applications.
- 3.23 The following policies support rollback and relocation of development at risk from coastal change:
- ESC Suffolk Coastal Local Plan policy SCLP9.4 (Coastal Change Rollback or Relocation)
  - ESC Waveney Local Plan policy WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion)
  - GYBC Local Plan Part 1 policy CS13 (Protecting Areas at Risk of Flooding or Coastal Change)
  - GYBC Local Plan Part 2 policy E2 (Relocation from Coastal Change Management Areas)
  - NNDC Core Strategy policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk). Emerging NNDC Local Plan policy CC6 (Coastal Change Adaptation) is also relevant as the emerging plan has reached an advanced stage.
- 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.

## 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 authorities. All coastal development proposals should take account of the timeframe of erosion risk across the CCMA. The primary purpose of the CCMA is to identify land that is likely to be vulnerable to coastal change now and in the future (across a 100 year timeframe). Incorporating the CCMA into Local Plans supports this purpose with the objective of avoiding inappropriate and guiding appropriate development within the CCMA.
- 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 2025), medium (up to 2055) and long (up to 2105) term erosion risk areas. This policy framework addresses risks to people and the built and natural environment with the intention of informing policy and planning decisions in a sustainable manner. As such, the emerging and adopted Local Plans of the Local Authorities have used the relevant SMPs as the evidence base to form the CCMA within their Local Plans and mapped these areas on their respective Policies Maps<sup>30</sup>. For information, North Norfolk District Council's existing Core Strategy Policies Map refers to a Coastal Erosion Constraint Area, which is also informed by the relevant SMPs.
- 4.3 The three erosion risk areas that make up the CCMA, the geographical extent of each risk area and the description of the nature of the risk in each area are detailed in each SMP. This information will provide a valuable insight for those seeking to understand the development options for a given area of land.
- 4.4 While the SMP evidence supporting the erosion risk areas, and therefore the CCMA, is robust, it is also important to note the following:
- The rate of coastal erosion (cliff recession rate) will rarely be steady or predictable. The SMP erosion risk areas show the likely overall extent of erosion for each epoch, but for example, it would be wrong to infer that half way through a particular epoch the erosion will extend to half of the risk area.

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

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

## What types of development can be appropriate in a CCMA

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

### 4.6 What the National Planning Practice Guidance (PPG) says:

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

### 4.7 The types of development this can include are:

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

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



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

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



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

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

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

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

### New permanent residential development

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

### New non-residential development

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

## Temporary and time-limited development/ uses

- 4.19 Temporary and time-limited development within a CCMA relates to development proposals that requires a coastal location and can be granted planning permission for a specific period of time in order to;
- reduce the risk to people and the development by taking account of the assessment of vulnerability; and
  - manage the removal of the development to minimise the impact on the community and on the natural and historic environment.
- 4.20 Development that is temporary (whether by its nature or by limiting its planning consent) is unlikely to constitute an increase in property or life at risk, provided it can be controlled in order to ensure its removal or relocation prior to the erosion risk becoming imminent. Temporary or time-limited development will often be considered as an appropriate response to coastal change and can help facilitate ‘adaptation’ to change. Also, as stated in the PPG<sup>31</sup>, ‘The use of modular forms of construction can mean buildings can be disassembled and reassembled in a new location as a way of minimising the cost of relocation.’ Such temporary and time-limited uses include, but are not limited to, use of land for caravans, mobile homes, temporary structures and land for open storage. In addition, some types of non-permanent residential development could be acceptable.
- 4.21 The result of such temporary development could, however, (individually or cumulatively) give rise to positive or negative impacts with regards to the character or viability of a settlement in the longer-term and this would need to be balanced in relation to the longer-term sustainability of that community.
- 4.22 It is difficult to define the lifetime of specific developments here, as each will have different characteristics, be located in a different part of a CCMA and potentially where a site spans across more than one risk area. Applicants would be expected to justify why they have adopted a given lifetime for the development when they are formulating their Coastal Erosion Vulnerability Assessment (CEVA) (see CEVA section). Developers, the Local Planning Authority and the Environment Agency should aim to agree what lifetime is acceptable, having regard to the anticipated impacts of coastal change taking into account climate change. Where the lifetime of the development is prescribed by the time in which coastal change is anticipated to impact on it, the lifetime of the development will be controlled by a specific time limited planning condition. Such a condition would require the review of the permission in relation to rates of coastal change and ensure the removal of the development prior to the anticipated impact of the coastal change. The condition would also be re-applied to a renewed planning consent, where erosion has progressed at a lower rate than predicted.
- 4.23 The lifetime of a non-residential development depends on the characteristics of that development. Applicants would be expected to justify why they have adopted a given lifetime for the development, for example, when they are preparing a Coastal Erosion Vulnerability Assessment

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<sup>31</sup> <https://www.gov.uk/guidance/flood-risk-and-coastal-change> - Paragraph: 074 Reference ID: 7-074-20220825 (Revision date: 25 08 2022)

## Open Land Uses

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

## Changes of Use

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

## Extensions (including householder development)

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

## Intensification of Use (non-residential)

- 4.29 Intensification of the use of a building can increase the extent of risk to life, particularly where it is occupied on a permanent basis, but it is unlikely to increase the magnitude of property at risk. Intensification of use could be a means of improving the viability of a use, by securing greater investment in the maintenance of a property, which will be important in helping to counterbalance the degenerative effect of blight associated with coastal change. Proposals for intensification will frequently

not need planning permission, but where they do, they will need to be considered in light of the existing risk.

- 4.30 For intensification of the use of properties within the risk zone associated with the first epoch to be appropriate, an applicant should demonstrate that any increase in risk to life can be mitigated, for example through conditions or legal agreements. Beyond the first epoch, the principle of the intensification of a non-residential use is likely to be acceptable in the context of the existing risk to life, as the increase is likely to be minimal. The degree of control over the occupancy or use of the property may be pertinent, for example, if the proposal involves increasing the occupancy (either through the total number or extending the period of occupancy) of a building that is run or managed as part of a wider business this could pose less of a risk than an independently occupied building.

### **Redevelopment or reconfiguration of existing sites (non-residential)**

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

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

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

### **Essential Infrastructure and Community Uses**

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

impact on coastal change. In addition, development proposals should demonstrate that they would provide wider sustainability benefits that outweigh the predicted coastal change impact.

## Coastal Erosion Vulnerability Assessment (CEVA)

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

4.40 For practical reasons it is difficult to define the lifetime of development as each development will have different characteristics. For guidance, new permanent residential development should be considered for a minimum of 100 years, and non-residential development should be considered to have a lifetime of at least 75 years<sup>32</sup>. 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.

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

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

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

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

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

*Table 2: CEVA matrix for development types*

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

<sup>32</sup> As evidenced at paragraph 006 of the Flood Risk and Coastal Change PPG: <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

(Suffolk Coastal Local Plan)	30m risk zone <sup>33</sup>	Level B	Level A	Level A	Level A	Level A
	30m – 60m risk zone landward of coastal risk management structures in areas of soft cliffs <sup>34</sup>	Level B	Level A	Level A	Level A	Level A
East Suffolk Council (Waveney Local Plan)	Within CCMA	Not permitted	Level B	Level B	Level B	Level A
	30m risk zone	Level B	Level A	Level A	Level A	Level A
Great Yarmouth Borough Council (Great Yarmouth Local Plan Core Strategy)	Within CCMA	Not permitted	Level B	Level B	Level B	Level A
	30m risk zone	Level B	Level A	Level A	Level A	Level A
North Norfolk District Council (North Norfolk Core Strategy)	Within Coastal Erosion Constraint Area (CECA) <sup>35</sup>	Level B	Level B	Level B	Level B	Level A
North Norfolk District Council (emerging Local Plan)	Within CCMA	Not permitted	Level B	Level B	Level B	Level A
	30m risk zone	Level B	Level A	Level A	Level A	Level A

4.45 The different types of development identified in the above CEVA matrix are defined in the above section, from paragraph 4.15.

<sup>33</sup> The 30m risk zone should be measured from the CCMA, or in Hold the Line areas from the landward edge of coastal defences.

<sup>34</sup> Policy SCLP9.3 (Coastal Change Management Area) of the Suffolk Coastal Local Plan requires consideration be given to the preparation of a CEVA in areas of soft cliff located up to 60 metres landward of coastal defences where known geological information indicates that the capacity of coastal defences area likely to be adversely affected by development.

<sup>35</sup> The North Norfolk Core Strategy identifies a Coastal Erosion Constraints Area (CECA) in policy EN11 (Coastal Erosion) and on its policies map. The CECA functions in the same way a CCMA would.



## Level A CEVA

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

## Level B CEVA

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

- 4.48 It would need to consider the following:

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

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

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

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

## 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. This can have a direct effect upon the long-term sustainability of affected coastal communities, for example through the erosion of land, to the potential effects emanating from ‘blight’ and a reduced desire to invest in those properties and the wider area.
- 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 authority<sup>1</sup> 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 Plan<sup>36</sup> are set out below:
- Policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk) - North Norfolk Core Strategy, Policy CC6 Coastal Change Adaptation – emerging Local Plan
  - Policy E2 (Relocation from Coastal Change Management Areas) - Great Yarmouth Local Plan Part 2
  - Policy WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion) - Waveney Local Plan
  - Policy SCLP9.4 (Coastal Change Rollback or Relocation) - Suffolk Coastal Local Plan
- 5.5 The purpose of this chapter of the SPD therefore is to provide further detail and guidance on the interpretation of the above policies, particularly upon common issues such as how land or sites may be identified for rollback or relocation purposes; how such land may be acquired or identified; and how land, which has been vacated, should be managed or utilised in the future to the point at which it eventually eroded. The exploration of these issues has framed the sub-headings of this chapter below.
- 5.6 It is important to note that at the present time the Government does not offer ‘compensation’ for properties lost as a result of coastal change. Compensation is not a matter which can be considered under planning policy. Some government funding can be accessed to assist with demolition of residential properties under a Coastal Assistance Grant if they were purchased before 15 June 2009.

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<sup>36</sup> The Broads Local Plan does not include any policies relating to rollback and relocation

## 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 roll-back or relocate residential properties to, the Local Plans require those alternative areas to be compliant with a number of policy criteria. Whilst some of these criteria are shared by each Local Plan there are some differences, which reflects the nature and purpose of individual plans, and therefore greater interpretation on these matters are explored further below:
- 5.9 **General locational principles**
- 5.10 The North Norfolk (EN11) and Great Yarmouth (E2) Local Plan policies are broadly similar in their approach when guiding alternative areas or land to enable sites to roll-back or relocate residential properties to. These require sites to be within or adjacent to identified settlements, whilst outside either the Coastal Change Management Area (Great Yarmouth Local Plan) or Coastal Erosion Constraint Area (North Norfolk Local Plan).
- 5.11 Whilst the terms ‘identified settlement’, ‘Coastal Change Management Area’ and ‘Coastal Erosion Constraint Area’ are clearly defined within both Local Plans, the term adjacent is not. In most circumstances the preference will be for development to share a land boundary with an existing settlement (for example adjacent to a settlement’s development limits/boundaries) as this helps to maintain a more sustainable form of development and helps to reduce the potential for isolated dwellings in the countryside.
- 5.12 Notwithstanding this preference, the term may also be more flexibly applied in order to take into account the prevailing character or function of each settlement, and in circumstances where it is not possible to share a land boundary e.g., where settlements do not have development limits/boundaries.
- 5.13 Similarly to the Great Yarmouth and North Norfolk Local Plans, the Waveney (WLP8.26) and Suffolk Coastal (SCLP9.4) Local Plan policies also require relocated sites to be located outside of their respective Coastal Change Management Area. Whilst there is no requirement for site’s to be ‘adjacent’ to development limits/boundaries, the policies do permit relocation or rollback outside of settlement boundaries<sup>37</sup>, 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.
- 5.14 In simple terms this means that in interpreting the policy, the applicant will need to clearly demonstrate that the occupiers of the roll-back or relocated dwelling will not be disadvantaged with respect to accessing facilities (e.g. primary school, food shop, bus services, employment opportunities etc) than the location the original dwellings was in; and where possible, demonstrate an improved level of access to such facilities.

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<sup>37</sup> Equivalent term to development limits or development boundary

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

### **Size of replacement/relocated properties**

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

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

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

### Identifying alternative areas or land

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

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

- 5.24 The phasing or timing of relocation can be critical to the success of any rollback scheme. For practical and operational reasons a relocation may have to be spread over an extended period of time (a caravan site, for example). This can have implications for local communities as it could lead to a longer period of construction. At the same time it is recognised that an extended period of time may be needed to help absorb the costs and potential loss of business before the new site is fully established
- 5.25 Opportunities to relocate and redevelop within existing site boundaries may also be appropriate. This could include moving buildings away from the cliff edge to vacant land; reconfiguration of the layout of buildings within the site; reusing more vulnerable parts of the site for open land uses or other temporary uses. Therefore, in the short-term risk area, proposals for temporary uses, open land uses, some changes of use and small extensions may be acceptable. In both the medium and long-term areas within the CCMA, where the CEVA demonstrates there will be no increased risk to property or people as a result of the development, larger extensions, new buildings and some intensification of use may be permitted. A balance will need to be made between the risk associated with retaining a coastal location and the wider economic benefits for the operator and wider community. Proposals for development that demonstrates that this is the case and that the longer term coastal risk planning is incorporated, will be supported.
- 5.26 Where relocation to a new site is necessary, this should normally be located where it is accessible (or well-related<sup>38</sup>) to the community from which it was displaced. Though this will depend on the specific type of use being relocated, this will normally mean no more than 100-200m away from the existing community and with appropriate highway links for vehicular and non-vehicular traffic.
- 5.27 There are some sports grounds and courses which are located on the coast, such as football pitches. Whilst some sports facilities are only for the benefit of their membership, almost all allow visitors and some are available to the public (to hire, for example). Some coastal golf courses are at high risk, as

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<sup>38</sup> As per North Norfolk Local Plan Policy EN11

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

- 5.28 Golf courses often have a dual role, firstly as a local sporting, leisure and cultural facility (they often have a restaurant, bar and function rooms, for example) and secondly as an important tourist location for golfing societies and golfing holidays. Therefore, it is important to retain golf courses where at all practicable. It may sometimes be possible to create new holes inland to replace those under threat, depending on land availability (and other considerations); this would be supported in principle. Some enabling development might be considered necessary to support the creation of new holes and this is discussed in Chapter 6
- 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).

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



## Habitats affected by coastal erosion

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

## Remediation, demolition and treatment of existing sites and their uses

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

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

## Acquisition of land for relocation and rollback

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



## 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, 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 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 five Local Plans and their policies on rollback/relocation, only the Great Yarmouth Local Plan (Policy E2) makes specific reference to enabling development and how any such cases would be assessed. Therefore, if a particular proposal makes an appropriate case for enabling development it would be in conformity with Policy E2. The other four Local Plans do not mention enabling development specifically in their rollback/relocation policies (although some may in supporting text). However, it is recognised that enabling development is an important element to facilitating the longer-term

sustainability of coastal communities. Any proposal utilising such an approach should use this guidance and seek further clarification from the relevant LPA so any proposal should be discussed with those planning teams.

## Example scenarios for enabling development

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

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

## Public benefit(s)

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

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

### Relocating residential dwellings

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

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

6.12 A good example of rollback is the provision of seven plots in an allocated site in Reydon, East Suffolk (Land west of Copperwheat Avenue, WLP6.1). This allocation – which now has planning permission – is

for approximately 220 dwellings, and seven plots must be made available for the relocation of properties at risk of (or already lost to) coastal erosion. This is discussed in more detail as a case study in Appendix 4.

### **Relocating tourism accommodation**

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

### **Relocating tourism facilities**

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

### **Relocating business premises**

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

### **Relocating other types of use/development**

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

## Enabling development to implement coastal risk management structures

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

## Lifespan of the proposed development

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

## Viability and enabling development

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

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

## Enabling development and legal agreements

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

## Key considerations

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

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

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

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

This statement of common ground is between:

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

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

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

## Background

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

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

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

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

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

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

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

## Shared Aims

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



## Agreed Approach

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

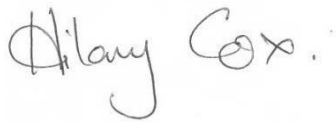
- a) Implement the principles of Integrated Coastal Zone Management;
- b) Develop shared understanding of coastal processes and the development planning implications of these;
- c) Share experience, best practice (including planning policies) and ideas for innovation;
- d) Use the adopted Shoreline Management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

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



Cllr. Ian Devereux  
Cabinet member for Environment

Borough Council of Kings Lynn and West Norfolk



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



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



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



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



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



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



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



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



Melanie Vigo di Gallidoro Chairman, Planning Committee Broads Authority



Haydn Thirtle  
Chair, Broads Authority



Endorsed by the Environment Agency Mark Johnson, Regional Coastal Manager

## APPENDIX 2 – ORGANISATION ROLES & RESPONSIBILITIES

Organisation	Scale	Role	Responsibilities
Anglian Eastern Regional Flood and Coastal Committee	Regional	Regional Flood and Coastal Committee	Established by the EA, the AERDCC has the purposes of: <ul style="list-style-type: none"> <li>- ensuring there are coherent plans for identifying, communicating and managing flood and coastal erosion risks across the catchment area and shoreline,</li> <li>- 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</li> <li>- 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.</li> </ul>
Broads Authority	Local	LPA	Prepare Local Plans and Supplementary Planning Documents, support the preparation of Neighbourhood Plans, and determine planning applications.
Coastal Partnership East (CPE is not an organisation but a shared team across ESC, GYBC and NNDC)	Regional	Coastal Partnership	CPE is a coastal management team comprised of the partner local authorities of ESC, GYBC and NNDC, whose role it is to carry out the permissive powers, not duties, of the local authorities as Risk Management Authorities/Coast Protection Authorities. CPE therefore as coastal LAs has permissive powers to manage the coast through constructing and consenting new coastal/erosion risk management measures, monitoring changes or repairing and maintaining existing structures. The team also work with the EA, other statutory bodies, RFCC and EACG to monitor and oversee Shoreline Management Plan policies.
Department for Environment, Food and Rural Affairs	National	Government Department	DEFRA provides the lead policy role for coastal erosion risk management.
Department for Levelling Up, Housing and Communities	National	Government Department	DLUHC provides the lead policy role in coastal erosion planning
East Anglian Coastal Group	Regional	Coastal Partnership	Coastal Groups are comprised principally of coastal management officers from district councils, statutory bodies and the EA, with the role of overseeing the preparation and implementation of SMPs, guiding government policy via consultation responses and sharing information and coastal management best practice at the regional and national levels.

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

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

# APPENDIX 3 – COASTAL EROSION VULNERABILITY ASSESSMENT (CEVA) TEMPLATE

## Level A CEVA

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

Statement:

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

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

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

9. Signed by the applicant:  
.....

10. Printed Name: .....

11. Date: .....

**Level B CEVA**

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

1. Name:  
.....

2. Agents Name (if applicable):  
.....

3. Development Location/Address:  
.....

4. Development Proposal:  
.....

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

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

6. SMP Policy Unit covering the development frontage: .....

7. Risk Band, please tick as applicable:

- 20 years
- 50 years



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

Statement

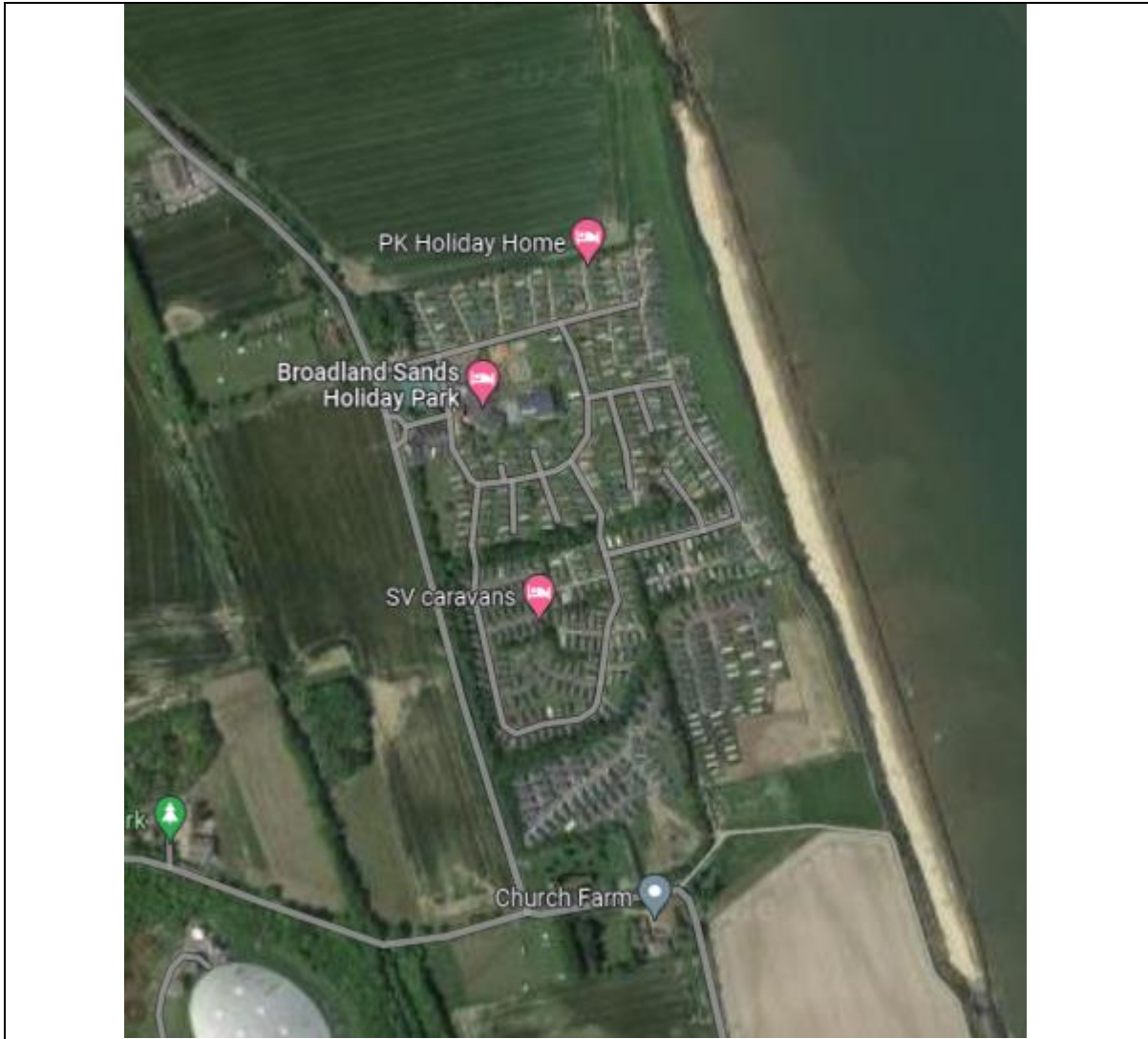
Please provide detailed answers to the following:

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

21. Date: .....

## APPENDIX 4 – CASE STUDIES

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



<p><b>Key Details:</b></p>	<ul style="list-style-type: none"> <li>• Tourism use but with community benefits including parking for church and public cycle/footpath</li> <li>• Designed to be rolled back as cliff erodes</li> <li>• Potential impact to landscape and setting of Grade I listed church</li> <li>• Creation of cycle and walkways</li> <li>• Creation of parking for the church</li> <li>• Reduction in holiday caravans due to earlier refusal</li> </ul>
<p><b>Details:</b></p>	<p>The existing holiday caravans are very close to the cliff edge due to erosion. Earlier consent was given for smaller rollback scheme within the existing holiday park but a larger area is needed to accommodate future rollback and growth. To accommodate this the site needs to (partially) relocate to a site to southwest on the western side of the Coast Road and adjoining Stirrups Lane.</p> <p>The scheme includes public walking and cycle ways and provision of parking for the church and green spaces with landscaping.</p> <p>Consent by SCC Highways to reduce the speed limit from 60mph to 30mph to allow for safe crossing to the main site and for the safety of pedestrians and cyclist and users of the car park.</p>



<b>Lessons Learned:</b>	<p>A balance needed to be found in relation to the impact on the setting of the grade I listed church and the economic benefits of the loss of a significant part of the site to coastal erosion.</p> <ul style="list-style-type: none"><li>• 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.</li><li>• 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.</li><li>• The church car park remained in the same location</li><li>• 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)</li><li>• 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</li></ul>
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# Beach Road Car Park and Ramp, replacement Happisburgh, Norfolk

<b>Planning Number:</b>	PF/11/0169	<b>Link to application:</b>	<a href="https://idoxpa.north-norfolk.gov.uk/online-applications/applicationDetails.do?activeTab=summary&amp;keyVal=ZZT68LNMS935">https://idoxpa.north-norfolk.gov.uk/online-applications/applicationDetails.do?activeTab=summary&amp;keyVal=ZZT68LNMS935</a>
<b>Authority:</b>	North Norfolk District Council	<b>Applicant:</b>	North Norfolk District Council
<b>Date of Application:</b> <b>Date of Permission:</b>	2011 2011	<b>Keywords:</b>	Rollback, Adaptation, Community Use

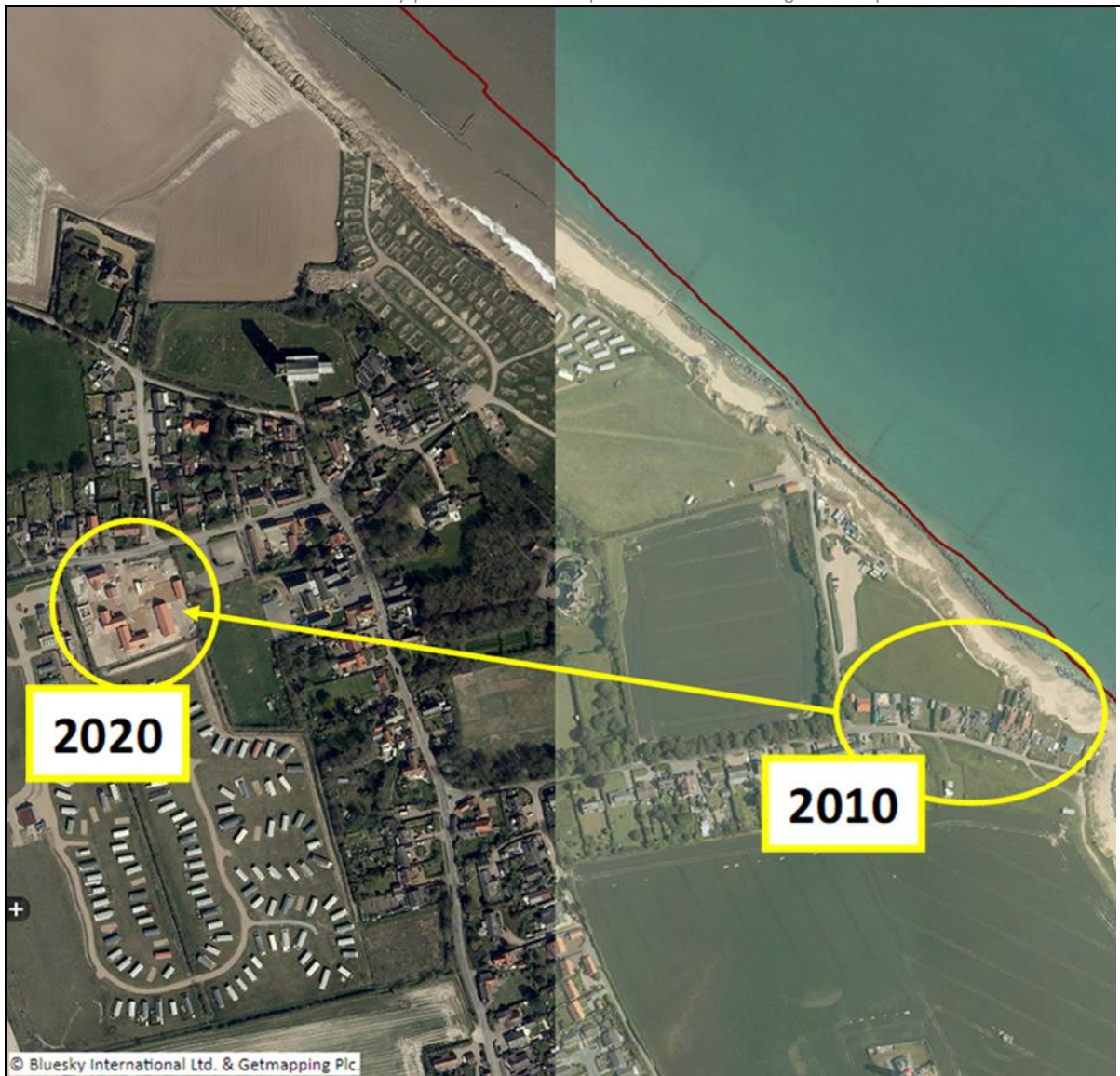


<p><b>Key Details:</b></p>	<ul style="list-style-type: none"> <li>• Community car park and Beach Access Ramp</li> <li>• Designed to be rolled back as cliff erodes</li> <li>• Ramp cut into cliff, no permanent materials used</li> <li>• Car park materials can be moved/retreated when necessary</li> </ul>
<p><b>Details:</b></p>	<p>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.</p>
<p><b>Lessons Learned:</b></p>	<p>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.</p>



# Beach Road residential property replacement, Happisburgh, Norfolk

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

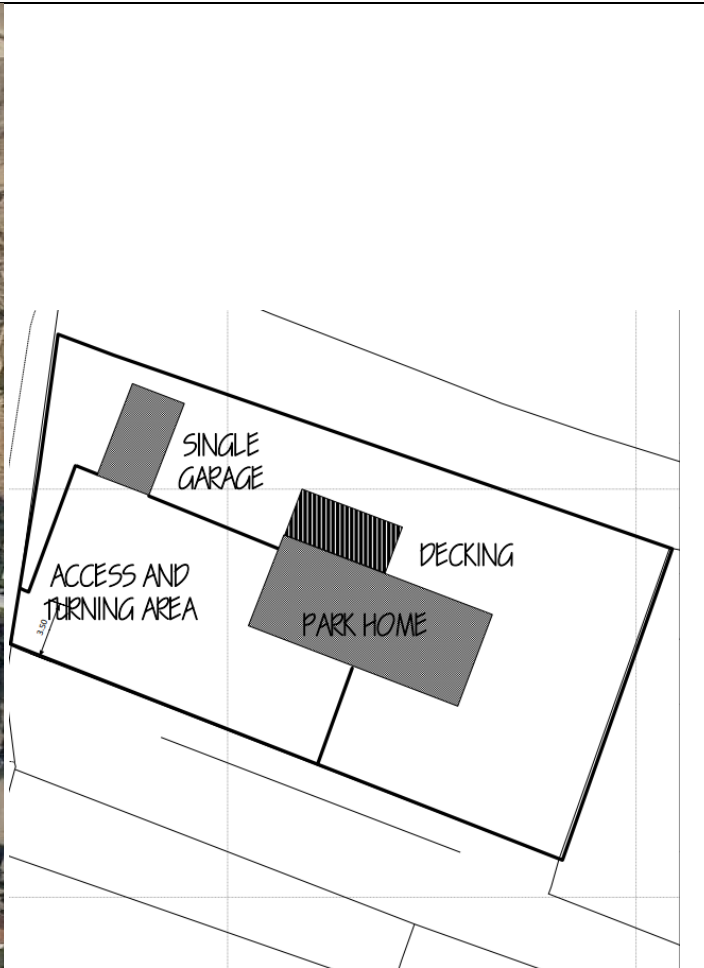
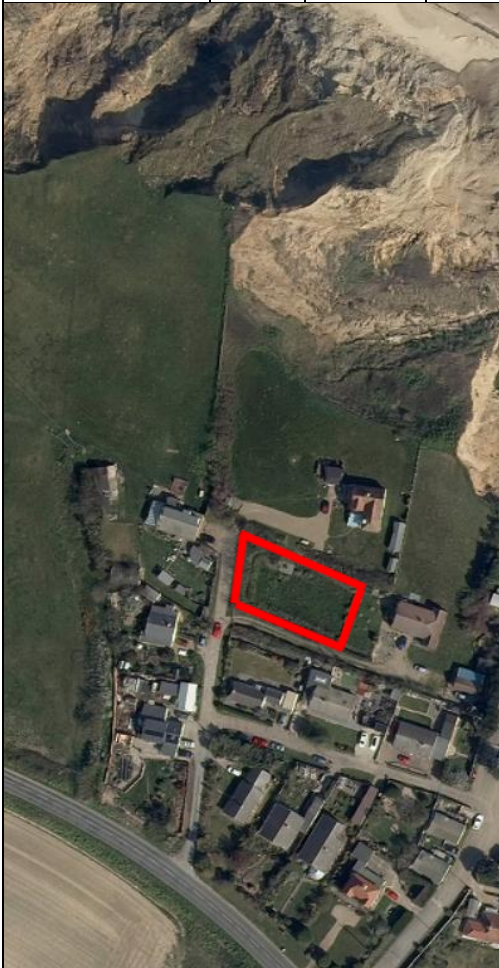


<p><b>Key Details:</b></p>	<ul style="list-style-type: none"> <li>• Using government funding, nine properties at short-term (20 years) risk of erosion were purchased by North Norfolk District Council and demolished</li> <li>• Nine properties of equivalent size gained consent on land within the parish but outside the coastal risk zone.</li> <li>• The land remained in the ownership of a third party and a legal agreement was arranged between the applicant (NNDC) and the landowner.</li> <li>• The land with consent was then sold and developed independently.</li> <li>• NNDC recouped a third of their costs.</li> </ul>
<p><b>Details:</b></p>	<p>Nine residential properties located within the twenty-year risk zone were purchased by North Norfolk District Council in 2011 under voluntary agreement. The rollback opportunity under local planning policy was secured by letter of agreement before the properties were demolished and the sites cleared and incorporated into wider clifftop open space. Sub-surface foundations and services were left in situ to minimise disturbance to the cliff. An assessment was completed as to where the relocated residential properties could be located. Although the policy allowed for properties to be located at other settlements within the district, it was agreed to seek to retain them within the parish from which they originated, to continue to maintain the viability of the village. Options were explored for a number of sites using viability assessments similar to one used to allocate development sites for local plans. The site was selected as preferred</p>

	<p>based on these criteria and a willing landowner. A legal agreement was established between the developer (NNDC) and the landowner to secure the rollback opportunity and commercial relationship between the two parties. A planning application was prepared and submitted. As with many local developments, there was a mixed response from the local community. These included calls for properties to be affordable homes, rather than open-market dwellings. Planning policy allows for like for like replacement and part of this trial was to understand how cost-viable such an approach would be. The land with planning consent was sold on the open market to a property developer and was subsequently constructed. This was one of the first examples of residential property relocation/rollback, with the purchase of the original properties, associated costs, documents for planning applications, legal agreement, and final profit share on the sale of the development site, approximately one third of NNDC's outlay was recouped.</p>
<p><b>Lessons Learned:</b></p>	<ul style="list-style-type: none"> <li>• May be more effective to facilitate owners using their own EN12 opportunity.</li> <li>• 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.</li> <li>• 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.</li> <li>• Using the purchase criteria and redevelopment methodology, in this case study, is not cost neutral to the developer (NNDC).</li> <li>• 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.</li> </ul>

# Land West of Little Marl, Trimingham, Norfolk

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



<b>Key Details:</b>	<ul style="list-style-type: none"> <li>• Site expected to be lost to erosion in 2025-2055 epoch (epoch 2)</li> <li>• Applicant had historic permission to build an additional bricks-and-mortar house</li> <li>• Instead, applied to place a caravan and garage on the site</li> <li>• This was a preferable type of home, given the risk of erosion</li> </ul>
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<b>Details:</b>	Applicant had historic permission to build two bungalows on land within Epoch 2 (indicative erosion up to 2055). One bungalow had been built in 1991, so the permission for the whole scheme remained extant. As an alternative to the second bungalow, the landowner sought permission to instead station a caravan on the land and erect a garage, due to the potential loss of land by the impact of coastal erosion. This was seen as a pragmatic approach to the threat of erosion, in line with the preference for adaptation on the coast, given that the caravan would be movable at a future date when it became at risk. After liaising with CPE colleagues, garage was reduced from double to a single non-permanent wooden garage.
<b>Lessons learned</b>	It is advantageous to be open to seek more appropriate solutions for historic live consents.

# Easton Lane Easton Bavents, Reydon, Southwold, Suffolk

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



<b>Key Details:</b>	<ul style="list-style-type: none"> <li>• Loss of two semi-detached houses</li> <li>• Rollback opportunities available on 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.</li> </ul>
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<p><b>Details:</b></p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Relocation sites were addressed within the Reydon Neighbourhood Plan, but no specific sites were allocated</li> </ul>
<p><b>Lessons Learned</b></p>	<ul style="list-style-type: none"> <li>• Residential needs to be considered where there are coastal problems – can be addressed within Neighbourhood Plans</li> <li>• Reydon Neighbourhood Plan has addressed this via paragraph 7.4 RPC <i>Action 5: Support and Protection For Property at Risk From Flooding or Erosion: In support of this Neighbourhood Plan, the Parish Council will support appropriate planning proposals as may be developed in the future for the relocation of properties at risk from erosion at Easton Bavents and any proposals made in the context of the Shoreline Management Plan to protect housing in areas vulnerable to future flooding</i></li> </ul>

# Land west of Copperwheat Avenue, Reydon, Suffolk

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



<b>Key Details:</b>	<ul style="list-style-type: none"> <li>• Some properties at Easton Bavents had been lost to erosion, and others were/are under threat</li> <li>• A 220-dwelling allocation (Policy WLP6.1) was made in the Waveney Local Plan for a site in Reydon</li> <li>• Seven plots are made available for the relocation of properties under threat (or already lost) from coastal erosion</li> </ul>
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<p><b>Details:</b></p>	<ul style="list-style-type: none"> <li>• 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</li> <li>• The plots have been included to assist particularly with the loss of (and threatened loss of) dwellings at nearby Easton Bavents</li> <li>• 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</li> <li>• 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)</li> <li>• 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</li> <li>• 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)</li> <li>• The application was resolved to be granted, and the outline planning permission was issued, on 16<sup>th</sup> September 2021</li> </ul>
<p><b>Lessons Learned</b></p>	<ul style="list-style-type: none"> <li>• The location of the site adjacent to the Suffolk Coast and Heaths AONB required some sensitive landscaping proposals</li> <li>• 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</li> <li>• 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</li> <li>• The principle having been achieved, it is conceivable that future Local Plans could repeat this process on other sites</li> </ul>

# Seamarge Hotel, Overstrand, Norfolk

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



<b>Key Details:</b>	<ul style="list-style-type: none"> <li>• Historic permission for two storey bricks-and-mortar extension to rear of hotel</li> <li>• Hotel is in Epoch 2 area (indicative erosion up to 2055)</li> <li>• Applied for permission to site seven movable lodges in grounds instead of historic permission</li> <li>• This was seen as a pragmatic approach to the risk of coastal erosion and in line with an adaptation approach</li> </ul>
<b>Details:</b>	<p>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</p>

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

# Wood Hill Holiday Park, East Runton, Norfolk

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



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

	<p>being in the indicative erosion epochs (up to 2105) by the end of phase 3. This application showed considerable forward planning, considering impacts such as water run-off, landscape</p> <p>The applicant’s consultants approached CPE beforehand to discuss the wider proposal, including how to remove redundant infrastructure. Several well-researched supporting documents were provided as part of the application, including, but not limited to, a Coastal Erosion Vulnerability Assessment and a Flood Risk and Drainage Assessment. The CEVA identifies coastal erosion risks and how the proposed scheme will seek to mitigate these.</p> <p>Total number of caravans increased from 64 on the site at Wood Hill to 40 on the Wood Hill site and 40 at Kelling Heath in order to ensure development was financially viable. The only question that arose in this application was whether the Kelling Heath part of the rollback conformed to Policy EN12, which requires the new development to be in a location which is well related to the community from which it was displaced.</p>
<p><b>Lessons learned</b></p>	<ul style="list-style-type: none"> <li>• Good use of assessment of coastal risk developed and utilised</li> <li>• Some enabling development</li> <li>• Long term considered planning with early engagement with the coastal and planning teams developed a high quality and well considered proposal.</li> <li>• Monitoring and future removal of below ground infrastructure included.</li> </ul>

# Manor Caravan Park, Happisburgh, Norfolk

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



<b>Key Details:</b>	<ul style="list-style-type: none"><li>- Caravan Park in short term risk zone.</li><li>- As part of Pathfinder, North Norfolk District Council liaised with the caravan park to help them find a suitable site for the caravan to move to.</li><li>- After caravans and infrastructure was removed, site was used as cliff-top grassland, providing buffer between village and sea.</li></ul>
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<p><b>Details:</b></p>	<p>Manor Caravan Park was primarily within the 2025 indicative coastal risk zone (epoch 1) of the shoreline management plan (SMP). Over a number of years, a significant number of static holiday home plots and land had been lost. A temporary consent had been granted to move the most at risk holiday homes onto an adjacent touring area. The holiday park had been identified by the local community as a key asset for the economic vibrancy of the village, with visitors supporting the local public house, shop, post office, etc. As such, NNDC’s liaison with the village confirmed there was a desire to ensure the holiday park remained well-connected with the existing village and facilities. North Norfolk District Council provided a business grant to Manor Farm Holiday Park to investigate options to relocate away from the coastal erosion risk zone. These funds were used to complete a site viability assessment including if they may be available. This included landscape visibility assessment as the core part of the village is a conservation area and has a number of listed buildings. Park owner used this information to identify preferred site by which a private agreement was agreed with the landowner, prior to the submission and application. Although the wider community had expressed a desire for the holiday park to remain in a close association with the village, there were a number of objections to the proposed position of the new site. The planning committee refused the application based on the landscape impacts. On appeal by the applicant the application was approved. The new site was prepared and all assets associated with the holiday park were moved. The original cliff-top site was cleared and remains open cliff-top grassland, providing a buffer between the village and the sea. The site is no longer traditional cliff-top park, with regular rows of holiday homes, it has more landscaped layout including hedges, planting to improve biodiversity and visual appearance.</p>
<p><b>Key Learning:</b></p>	<ul style="list-style-type: none"> <li>- Even with significant pre-application work, it does not guarantee a smooth ride with the decision making process.</li> <li>- There are challenges across competing constraints and needs when it comes to relocation and reprovision of assets at risk of coastal erosion.</li> <li>- 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.</li> <li>- 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.</li> </ul>



## APPENDIX 5 – EXAMPLE MODEL CONDITIONS

### Temporary Planning Permission

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

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

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

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

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

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

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

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

### Surface Water Drainage

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

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

### Relocated Dwellings

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

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

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

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

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

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

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

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

### Change of Use

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

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

# APPENDIX 6 – NEIGHBOURHOOD PLAN GUIDANCE

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

- National Planning Practice Guidance for Neighbourhood Planning<sup>39</sup>
- Locality guidance for neighbourhood planning<sup>40</sup>
- Local Planning Authority guidance (East Suffolk Council<sup>41</sup>, Great Yarmouth Borough Council<sup>42</sup>, North Norfolk District Council<sup>43</sup>, and The Broads<sup>44</sup>)

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:

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<sup>39</sup> <https://www.gov.uk/guidance/neighbourhood-planning--2>

<sup>40</sup> <https://neighbourhoodplanning.org/>

<sup>41</sup> <https://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/>

<sup>42</sup> <https://www.great-yarmouth.gov.uk/neighbourhood-planning>

<sup>43</sup> <https://www.north-norfolk.gov.uk/tasks/planning-policy/neighbourhood-planning/>

<sup>44</sup> <https://www.broads-authority.gov.uk/planning/planning-policies/neighbourhood-planning>

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

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

## APPENDIX 7 – GLOSSARY

### A

#### **Area of Outstanding Natural Beauty**

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

#### **Article 4 direction**

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

### C

#### **Coastal adaptation**

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

#### **Coastal Change Management Area**

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

#### **Coastal erosion**

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

#### **Coastal processes**

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

#### **Conservation area**

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

#### **Climate change**

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

### D

#### **Development plan**

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

### E

#### **Enabling development**

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

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

### **Erosion risk areas**

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

### **Exception site**

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

## **H**

### **Heritage asset**

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

### **Highway authority**

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

## **I**

### **Integrated Coastal Zone Management**

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

## **L**

### **Local development order**

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

### **Local plan**

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

### **Local planning authority**

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

### **Listed building**

A building identified for its special architectural or historic interest.

## M

### **Marine plan**

A plan prepared by a marine plan authority that sets policies for and in connection with the sustainable development of the relevant marine plan area.

## N

### **Neighbourhood development order**

A land use plan prepared by a local community group that grants planning permission to development specified in the neighbourhood development order.

### **Neighbourhood plan**

A land use plan prepared by a local community group containing planning policies against which planning applications are determined.

## P

### **Planning history**

The collection of historic planning permissions and/or enforcement action on an area of land.

## R

### **Relocation**

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

### **Risk management structure**

Structures designed to reduce the impact of coastal processes on an area along the coast.

### **Rollback**

The movement of development from a site at risk from coastal change to a site of much lesser risk, usually in relatively close proximity to the previous site. Similar to 'relocation'.

## S

### **Section 106 agreement**

A legal agreement requiring specified planning obligations to mitigate the impacts of development, entered into under section 106 of the Town and Country Planning Act 1990.

### **Shoreline Management Plan (SMP)**

A strategy for managing flood and erosion risk for a particular stretch of coast, over short, medium and long-term periods.

### **Sound**

The test set out in the National Planning Policy Framework (NPPF) against which local plans are assessed by Government appointed planning inspectors.

### **Special Area of Conservation**

An area of land designated under the Conservation of Habitat and Species Regulations 2017 (as amended) for its contribution to conserving habitats and species.

### **Special Protection Area**

An area of land designated under the Conservation of Habitats and Species Regulations 2017 (as amended) for its contribution to conserving birds.

### **Supplementary planning document (SPD)**

A document that adds further detail to the policies in the development plan and operates as a material consideration in the determination of planning applications.

## **T**

### **The Partnership**

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