



# Cabinet

Members are invited to a **Meeting of the Cabinet** to be held in the Conference Room, Riverside, Lowestoft, on **Tuesday, 5 September 2023 at 6.30pm.**

This meeting will be broadcast to the public via the East Suffolk YouTube Channel at <https://youtube.com/live/xa9t4GB3qhc?feature=share>.

## Members:

Councillor Caroline Topping (Leader of the Council), Councillor David Beavan (Deputy Leader and Housing), Councillor Paul Ashton (Corporate Services – Digital, Customer Services, HR and Assets), Councillor Tom Daly (Energy and Climate Change), Councillor Katie Graham (Communities, Leisure and Tourism), Councillor Toby Hammond (Economic Development and Transport), Councillor Vince Langdon-Morris (Resources and Value for Money), Councillor Mike Ninnmey (Community Health), Councillor Rachel Smith-Lyte (The Environment), Councillor Kay Yule (Planning and Coastal Management)

An Agenda is set out below.

## Part One – Open to the Public

Pages

- |          |  |              |
|----------|--|--------------|
| <b>1</b> | <b>Apologies for Absence</b><br>To receive apologies for absence, if any.  |              |
| <b>2</b> | <b>Declarations of Interest</b><br>Members and Officers are invited to make any declarations of interests, and the nature of that interest, that they may have in relation to items on the Agenda and are also reminded to make any declarations at any stage during the Meeting if it becomes apparent that this may be required when a particular item or issue is considered. |              |
| <b>3</b> | <b>Announcements</b><br>To receive any announcements.  |              |
| <b>4</b> | <b>Minutes</b><br>To confirm as a correct record the minutes of the meeting held on 11 July 2023.  | <b>1 - 9</b> |

## KEY DECISIONS

<b>Part One – Open to the Public</b>		<b>Pages</b>
<b>5</b>	<b>Roman Coin Hoard and Pot Disposal ES/1630</b> Report of the Cabinet Member with responsibility for Corporate Services - Digital, Customer Services, HR and Assets.	<b>10 - 18</b>
<b>6</b>	<b>Report of CIL Spending and the Infrastructure Funding Statement 2022-23 ES/1637</b> Report of the Cabinet Member with responsibility for Planning and Coastal Management.	<b>19 - 152</b>
<b>7</b>	<b>Coastal Adaptation Supplementary Planning Document ES/1633</b> Report of the Cabinet Member with responsibility for Planning and Coastal Management.	<b>153 - 580</b>
<b>8</b>	<b>Exempt/Confidential Items</b> It is recommended that under Section 100A(4) of the Local Government Act 1972 (as amended) the 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 Paragraphs 1, 2, 3, 4 and 5 of Part 1 of Schedule 12A of the Act.	

<b>Part Two – Exempt/Confidential</b>		<b>Pages</b>
<b>9</b>	<b>Exempt Minutes</b> <ul style="list-style-type: none"> <li>• Information relating to any individual.</li> <li>• Information relating to the financial or business affairs of any particular person (including the authority holding that information).</li> </ul>	
<b>KEY DECISIONS</b>		
<b>10</b>	<b>Withdrawal of East Suffolk Council from the Building Control Partnership with Ipswich Borough Council</b> <ul style="list-style-type: none"> <li>• Information relating to any individual.</li> <li>• Information that is likely to reveal the identity of an individual.</li> <li>• Information relating to the financial or business affairs of any particular person (including the authority holding that information).</li> <li>• Information relating to any consultations or negotiations, or contemplated consultations or negotiations, in connection with any labour relations matter arising between the authority or a Minister of the Crown and employees of, or office holders under, the authority.</li> </ul>	
<b>11</b>	<b>Kirkley Waterfront</b> <ul style="list-style-type: none"> <li>• Information relating to the financial or business affairs of any particular person (including the authority holding that information).</li> <li>• Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.</li> </ul>	
<b>12</b>	<b>Letting of 5-6 Newcombe Road, Lowestoft</b> <ul style="list-style-type: none"> <li>• Information relating to any individual.</li> <li>• Information relating to the financial or business affairs of any particular person (including the authority holding that information).</li> </ul>	

**NON-KEY DECISION**

**13 Port Health and Implementation of Border Target Operating Model Requirements**

- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

**Close**



Chris Bally, Chief Executive

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**[democraticservices@eastsoffolk.gov.uk](mailto:democraticservices@eastsoffolk.gov.uk)**

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**Unconfirmed**



Minutes of a Meeting of the **Cabinet** held in the Deben Conference Room, East Suffolk House, on **Tuesday, 11 July 2023 at 6.30 pm**

**Members of the Cabinet present:**

Councillor Paul Ashton, Councillor David Beavan, Councillor Tom Daly, Councillor Katie Graham, Councillor Toby Hammond, Councillor Vince Langdon-Morris, Councillor Mike Ninnmey, Councillor Caroline Topping, Councillor Kay Yule

**Other Members present:**

Councillor Mark Jepson, Councillor Craig Rivett, Councillor Rosie Smithson, Councillor Ed Thompson

**Officers present:**

Trazar Astley-Reid (Resilient Coasts Programme Manager (FCRIP)), Chris Bing (Head of Legal and Democratic Services), Kerry Blair (Head of Operations), Kate Blakemore (Strategic Director), Sarah Davis (Democratic Services Officer (Scrutiny and Member Development)), Heather Fisk (Head of Housing), Martin Hone (Deputy Chief Finance Officer), Andy Jarvis (Strategic Director), Nick Khan (Strategic Director), Tom Potter (Press and Publicity Officer), Sarah Shinnie (Corporate Events and Commercial Projects Officer), Tim Snook (Leisure Development Partnership Manager), Nicola Wotton (Deputy Democratic Services Manager)

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**1 Apologies for Absence**

An apology for absence was received from Councillor Rachel Smith-Lyte, Cabinet Member with responsibility for the Environment.

**2 Declarations of Interest**

Councillor Ninnmey, Cabinet Member with responsibility for Community Health, declared an Other Registerable Interest during the discussions of Item 15 - East Suffolk Play Action Plan 2023-27, during the discussions on this item, as he was a member of the Felixstowe and District Sports Council.

**3 Announcements**

There were no announcements made.

**4 Minutes**

On the proposition of the Cabinet Member with responsibility for Planning and Coastal Management, seconded by the Cabinet Member with responsibility for Resources and Value for Money, it was by a unanimous vote

## **RESOLVED**

That the minutes of the meeting held on 6 June 2023 be agreed as a correct record and signed by the Chair.

### **5 RingGo: Contract renewal**

Cabinet received report **ES/1564** by the Cabinet Member with responsibility for Corporate Services - Digital, Customer Services, HR and Assets and the Cabinet Member with responsibility for Economic Development and Transport. The report sought approval for the renewal of the RingGo contract, which would enable visitors choosing to drive to East Suffolk's towns and attractions to continue to use the cashless parking application for navigation, payments and parking sessions extensions, and the telephone (interactive voice recognition (IVR)) service for payments only.

Cabinet was advised that, whilst it would be a popular if all of the Council's car parks were made free to use, it would not be appropriate for the tax-payer to subsidise the motorist. It was important to strike a balance and it was felt that Ringo would help to achieve that. Ringo remained fit for purpose and met the Council's business needs, whilst contributing to decarbonising service delivery and provided a service for approximately 100,000 regular users each month. Cabinet noted that over 50% of transactions were by Ringo, which removed a large number of coins from the parking system, however, users could still use cash at all car parks, if they so wished.

Cabinet was advised that an exemption from the Contract Procedure Rules was not permitted due to the size of the contract, however, a direct award using a procurement framework was permitted and the contract extension would be awarded on that basis.

Councillor Ninmeyer stated that he was interested in continuing with the free 30 minutes parking, as he felt that since Marks and Spencer had closed in Felixstowe, more was needed to attract people to Felixstowe for their shopping. The Cabinet Member for Economic Development and Transport reported that a parking review would take place across the whole of the District in due course and local communities views would be sought on parking matters and a further report would be brought to Cabinet for consideration.

Councillor Langdon-Morris asked about parking charges when visiting the Accident and Emergency departments at hospital and it was noted that the Council did not own any hospital car parks. The Ringo contract under discussion would only affect Council-owned car parks in the district.

The recommendations were then moved by the Cabinet Member with responsibility for Economic Development & Transport and seconded by the Cabinet Member with responsibility for Corporate Services - Digital, Customer Services, HR and Assets. Upon being put to the vote it was unanimously

## **RESOLVED**

1. That Option 3, to renew the contract with RingGo, be approved.
2. That authority be delegated to the Head of Operations, in consultation with the Cabinet Member with responsibility for Economic Development and Transport, to award the contract for the cashless parking service, after undertaking a procurement exercise pursuant to the Council's Contract Procedure Rules and Public Contract Regulations 2015.

## **6 Draft Outturn 2022/23 and 2023/24 Quarter 1 Budget Outlook**

Cabinet received report **ES/1579** by the Cabinet Member with responsibility for Resources and Value For Money. The report provided Cabinet with an overview of the Council's unaudited financial performance for 2022/23 in respect of the General Fund, Reserves, Housing Revenue Account (HRA), the Capital Programme and the Collection Fund.

Cabinet noted that for 2022/23, the Council's General Fund realised a surplus year end position of £0.768m. The report sought approval for the surplus to be transferred to earmarked reserves as outlined in the recommendations. The report also sought approval of the year end movements to and from the Council's other Earmarked Reserves as shown in Appendix F. The report also provided Cabinet with an initial budget outlook for the year ahead, as at Quarter 1 of 2023/24.

Councillor Rivett requested clarification regarding the Indoor Leisure Debt write off of £325k, as referenced on page 34 of the report. The Cabinet Member for Resources and Value for Money invited Mr Blair, Head of Operations to respond to the question. Mr Blair stated that the write off was related to exiting a former leisure contract and was a contingent liability. However, the funding had not been required and the money had been duly returned to the General Fund, in accordance to the financial regulations.

Councillor Rivett queried the minimum energy efficiency standards and the £113,000 highlighted for that purpose. He asked if that money had been used for a member of staff or whether it was for training? The Cabinet Member for Resources and Value for Money invited Mr Hone, Deputy Chief Finance Officer, to respond to that question. Mr Hone reported that the funding had been used for a variety of consultancy and training. Mr Hone stated that he would provide further detailed information in this respect, outside of the meeting, for all Members.

The recommendations were then moved by the Cabinet Member with responsibility for Resources and Value for Money and were seconded by the Cabinet Member with responsibility for Economic Development and Transport. Upon being put to the vote it was unanimously

## **RESOLVED**

1. That the Council's draft outturn position for 2022/23 together with reserves and balances as of 31 March 2023 be noted.

2. That the transfers to and from reserves shown in Appendix F be approved, including the transfer of the General Fund outturn surplus as follows:

- £0.200m to the Transformation Reserve – Environment Theme
- £0.100m to the Transformation Reserve – Digital Theme
- £0.200m to the Revenues & Benefits Admin Reserve
- £0.268m to the In-Year Savings Reserve

3. That the budget carry forward requests above £0.03m set out in paragraph 2.4 be approved.

4. That the key financial considerations for 2023/24 be noted.

## **7 Appointments to the Environment Task Group**

Cabinet received report **ES/1566** by the Cabinet Member with responsibility for the Environment, which was presented by the Leader of the Council. The report sought approval to appoint Members to the Environment Task Group and to make an amendment to the Terms of Reference.

Cabinet noted that, following the elections in May 2023, 9 Members needed to be appointed to the Environment Task Group (ETG), which was politically balanced. Therefore, the GLI Group had 5 places, Conservatives had 2 places and Labour also had 2 places.

The report also proposed a minor amendment to the Terms of Reference of the ETG, to clarify the requirement of the Group to be politically balanced.

There being no questions or debate, the recommendations were moved by the Leader and were seconded by the Cabinet Member with responsibility for Energy and Climate Change. Upon being put to the vote it was unanimously

### **RESOLVED**

1. That the appointment of Councillor Rachel Smith-Lyte, Councillor Katie Graham, Councillor Janet Candy, Councillor Sarah Plummer, Councillor Stephen Molyneux, Councillor Louise Gooch, Councillor Rosie Smithson and Councillor Edward Back to the Environment Task Group be approved.
2. That the amended Terms of Reference for the Environment Task Group be approved.

## **8 Resilient Coasts Project Board Governance Structure**

Cabinet received report **ES/1567** by the Cabinet Member with responsibility for Planning and Coastal Management. The report sought approval to alter the Governance structure of Resilient Coasts to amalgamate the Joint Coastal Project Board (JCPB Suffolk) onto the Resilient Coasts Project Board. It was noted that the New

Resilient Coasts Project Board was yet to be initiated due to the recent elections in May 2023.

Cabinet noted that drawing in the knowledge from the JCPB Suffolk into the Project Board for Resilient Coasts would enable the project to build on the established knowledge of this group and to increase local knowledge and buy-in for the Resilient Coasts Project.

The Cabinet Member for Planning and Coastal Management stated that establishing a full, clear open, honest and transparent governance structure was crucial to decision making. Best practice for other projects, such as the Gorleston to Lowestoft Coastal Strategy, had ensured that decisions made about future coastal management were open to scrutiny, which gave confidence to communities and statutory partners, such as the Environment Agency, Natural England and Defra.

The JCPB Suffolk were already committed to attend four meetings per year. If the Governance Structure was not amended the officers and partners would need to attend 4-8 more meetings per year.

Councillor Rivett took the opportunity to thank, also on behalf of Councillor Byatt, Coastal Partnership East for all of their hard work and interventions in Pakefield, which had experienced a great deal of coastal loss very quickly. He then drew Members' attention to the outline business case, which mentioned procurement and other authorities. He stated that East Suffolk Council's procurement policies and procedures had recently been reviewed and he asked whether other Councils' procurement procedures would maintain the high standards achieved at ESC? The Cabinet Member with responsibility for Planning and Coastal Management stated that the purpose of bringing all of the knowledge and expertise together would be to ensure that best practice was achieved at all times for the best interests of local residents.

The Cabinet Member with responsibility for Planning and Coastal Management moved the recommendation within the report, which was seconded by the Cabinet Member with responsibility for Communities, Leisure and Tourism. Upon being put to the vote it was unanimously

## **RESOLVED**

That the amalgamation of the Joint Coastal Project Board (Suffolk) onto the Resilient Coasts Project Board be approved.

## **9 Appointments to Southwold Harbour Management Committee (SHMC)**

Cabinet received report **ES/1565** by the Leader of the Council, which sought approval to appoint 5 Councillors to the Southwold Harbour Management Committee (HMC), following the elections in May 2023. It was noted that the HMC must have 5 Councillors appointed to it, in accordance with its Terms of Reference. A skills audit had been undertaken of the 5 Councillors it was proposed sit on the HMC. The audit demonstrated that the Councillors collectively had the knowledge, skills and experience required. The skills matrix was attached as Appendix A to this report.

Cabinet noted that the purpose of the HMC was to make recommendations to the Leader of the Council or Cabinet, whose consent to the Committee's recommendations would not be unreasonably withheld or delayed.

Councillor Rivett referred to the skills audit and the section on the Management and Development of Property or Facilities and, in particular, Caravan Site Operation and Tourism, which appeared to be the section where there was the least collective knowledge and experience. He asked how that area of knowledge and expertise would be covered, given the nominated Councillors did not appear to have skills in those areas. The Leader invited Mr Blair, Head of Operations, to respond to this question. Mr Blair stated that there would inevitably be some gaps in the Councillor's knowledge and experience, however, there were 4 Co-opted Members on the HMC, who would have the required knowledge and experienced to fill any gaps. The HMC would also be working closely with the Asset Management Team, to ensure there were strong commercial skills available. It was noted that the Asset Management Team was currently being restructured in order to provide a dedicated Estate Manager to support Southwold Harbour and to provide more strength with regards to the caravan site. Mr Blair stated that, taken as a whole, the skills set should be met.

The Leader moved the recommendation within the report, which was seconded by Deputy Leader and Cabinet Member with responsibility for Housing. Upon being put to the vote it was unanimously

#### **RESOLVED**

That the appointment of Councillor David Beavan, Councillor Paul Ashton, Councillor Jan Candy, Councillor Toby Hammond and Councillor Lee Reeves to the Southwold Harbour Management Committee be approved.

### **10 Quarterly Southwold Harbour Update**

Cabinet received report **ES/1568** by the Deputy Leader and Cabinet Member for Housing, which provided the quarterly update on the activity and work relating to the management of Southwold Harbour. It was reported that Cabinet were the Duty Holder for Southwold Harbour and were required to receive regular updates on the Harbour.

Cabinet noted that priority had been given to matters of marine compliance and the application of a Harbour Revision Order. The report set out the actions that had been taken to ensure that the harbour operation was compliant with the Port Marine Safety Code and other regulations.

There being no questions or debate, the Deputy Leader and Cabinet Member with responsibility for Housing moved the recommendation within the report, which was seconded by the Cabinet Member with responsibility for Resources and Value for Money. Upon being put to the vote it was unanimously

#### **RESOLVED**

That the contents of the report at Appendix A be noted.

## 11 Housing Regulation Quarterly Update

Cabinet received report **ES/1582** by the Deputy Leader and Cabinet Member with responsibility for Housing. The report provided an update to Members on the Housing Regulation Matters, which had led to a Regulatory Notice being issued to East Suffolk Council (ESC) by the Regulator of Social Housing (RSH) for a breach of the Home and Rent Standards.

Cabinet was advised that this report followed paper ES/1432, which was presented to Full Council on 25 January 2023. At that meeting, recommendation 6 stated: “Members note that quarterly updates will be presented to Cabinet, detailing the progress against the Compliance and Rent Improvement Plans.” Due to the pre-election period and Cabinet Meetings not taking place during April, this had been the first report to the Cabinet, following the Annual Full Council meeting in May. Quarterly updates would be provided until the Regulatory Notice was withdrawn.

The Deputy Leader and Cabinet Member with responsibility for Housing stated that the Housing Regulations were very complex and were regularly updated. The report stated that the Council continued to make significant progress on compliance matters and was in a much better position than it was 18 months ago. The forensic rents audit had also been completed, which had been very technical and the refunds project would shortly be initiated.

An external review of housing governance had been requested by Full Council in January 2023 and this had recently been completed and considered by the Audit and Governance Committee on 10 July. The review had provided 10 recommendations, which officers had accepted in full and were now implementing. The review had also found that all of the steps taken to identify and address the housing management issues, as endorsed by Full Council, were considered to be sufficient.

Councillor Rivett and other Members took the opportunity to thank Mrs Fisk, Head of Housing, and her Housing Teams for all of their hard work and progress made in addressing the issues which had been identified.

The Deputy Leader and Cabinet Member with responsibility for Housing then moved the recommendations within the report and this was seconded by the Cabinet Member with responsibility for Energy and Climate Change.

The Cabinet Member with responsibility for Community Health took the opportunity to ask about the costs involved in bringing the Council’s housing stock up to the good homes standard and if there was any government assistance available? Mrs Fisk reported that there was no government funding for this area of work, instead rental income had been used. The last Administration had approved in November 2022, a budget of £2 million to spend on fire safety works on Council properties and that work was currently underway. Mrs Fisk was pleased to report that the Council was now almost 100% compliant with the legislative requirements. The only properties that were not complaint were where the tenants had refused access for the works to be completed. As a result, action was being taken to try to gain access to those properties. In relation to the Decent Homes Standard, the government was currently

consulting on having a new standard that would apply to all tenures of dwelling. When the new Standard was implemented by the government, the Council's housing stock would need to be assessed against the new standard, which may lead to additional works being required. Stock condition surveys were also being undertaken on all ESC flatted blocks and houses by Council officers. It was planned to undertake surveys of 20% of dwellings each year, in order that they would all be assessed on a five yearly cycle.

The Cabinet Member with responsibility for Energy and Climate Change stated that he was pleased to second the recommendations and was very encouraged by the way the Council was taking forward the improvements and helping those local residents who needed it the most. Upon being put to the vote it was unanimously

### **RESOLVED**

1. That Cabinet notes the information contained within this report and endorses the actions set out to ensure the Council is compliant with the Regulator of Social Housing Consumer 'Home Standard'.
2. That Cabinet notes the information contained within this report and endorses the actions set out to ensure the Council is compliant with the Regulator of Social Housing 'Rent Standard'.
3. That Cabinet note that the next quarterly update will be presented to October's Cabinet Meeting.

## **12 Exempt/Confidential Items**

On the proposition of the Cabinet Member with responsibility for Economic Development and Transport, seconded by the Cabinet Member with responsibility for Planning and Coastal Management, it was by a unanimous vote

### **RESOLVED**

That under Section 100A(4) of the Local Government Act 1972 (as amended) the public be excluded from the meeting for the following items of business on the grounds that they involved the likely disclosure of exempt information as defined in Paragraphs 1 and 3 of Part 1 of Schedule 12A of the Act.

## **13 Exempt Minutes**

- Information relating to any individual.
- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

## **14 Improving Access to the Private Rented Sector**

- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

**15 East Suffolk Play Action Plan 2023 - 2027**

- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

The meeting concluded at 7.31 pm

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Chair



**CABINET**  
**Tuesday, 05 September 2023**

<b>Subject</b>	Roman Coin Hoard and Pot Disposal
<b>Cabinet Member</b>	Councillor Paul Ashton Cabinet Member with responsibility for Corporate Services – Digital, Customer Services, HR and Assets
<b>Report Author(s)</b>	Laura Hack Public Realm Contracts Manager <a href="mailto:laura.hack@eastsoffolk.gov.uk">laura.hack@eastsoffolk.gov.uk</a>
<b>Head of Service</b>	Kerry Blair Head of Operations <a href="mailto:kerry.blair@eastsoffolk.gov.uk">kerry.blair@eastsoffolk.gov.uk</a>
<b>Director</b>	Andrew Jarvis Strategic Director <a href="mailto:Andrew.Jarvis@eastsoffolk.gov.uk">Andrew.Jarvis@eastsoffolk.gov.uk</a>

Is the report Open or Exempt?	OPEN
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Category of Exempt Information and reason why it is <b>NOT</b> in the public interest to disclose the exempt information.	Not Applicable
<b>Wards Affected:</b>	Wickham Market

## Purpose and high-level overview

### **Purpose of Report:**

To provide information on the origin of the Border Cot Lane Hoard and options on its future.

### **Options:**

1. Retain hoard on long-term loan with the County Archaeological Service and Council officers arrange for physical valuations to take place every three years.
2. Donate the hoard to the County Archaeological Service.
3. Cease the loan to the County Archaeological Service and arrange for secure storage at East Suffolk House.
4. Offer the hoard and pot to the Wickham Market Archive Centre.

### **Recommendation:**

That the Hoard be donated to the Wickham Market Archive Centre, which will ensure that it is kept in the district, with a caveat that if the organisation ceases, it is then donated to the County Archaeological Service.

## Corporate Impact Assessment

### **Governance:**

The Hoard was found on SCDC land during development of a business unit at Boarder Cot Lane in Wickham Market in 1983. The hoard has a monument record of WKM004 logged with Suffolk County Council's Archaeological Service and the determination that SCDC, now East Suffolk Council, is the owner is confirmed by the letter dated 11 September 1984 from the British Museum, as no inquest was held by the Coroner (Appendix A). The Council can therefore dispose of the artefacts as it sees fit.

### **ESC policies and strategies that directly apply to the proposal:**

5.5.10 of the Constitution, page 133

### **Environmental:**

Not applicable

### **Equalities and Diversity:**

Not applicable

### **Financial:**

Should it be decided to retain the hoard and store it at the Council, there will be capital security costs (as dictated by Zurich) to house it and approximately £300 valuation costs every three years.

### **Human Resources:**

If kept by East Suffolk Council the hoard and pot will require a named officer to take responsibility for the location and periodic valuation.

<b>ICT:</b> Not applicable
<b>Legal:</b> As the hoard and pot is on the Asset Register, 5.5.10 of the Constitution, page 133, refers to following best practice guidelines for asset disposals, issued by the CFO.  The Constitution (pp 133-135) refers the reader to “Local Authority Assets: Disposal Guidance - DCLG March 2016” for the process to follow to dispose of assets. This guidance only relates to the disposal of land and property (rather than artefacts) but is the closest relevant process. Asset disposal is not expressly reserved to Council under The Local Authorities (Functions and Responsibilities) (England) Regulations 2000, so it is by default a Cabinet function.
<b>Risk:</b> Housing the hoard and pot on site within the Council offices may increase the chance of theft.

<b>External Consultees:</b>	County Archaeological Service Wickham Market Parish Council Wickham Market Archive Centre
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## Strategic Plan Priorities

Select the priorities of the <a href="#">Strategic Plan</a> which are supported by this proposal: <i>(Select only one primary and as many secondary as appropriate)</i>		Primary priority	Secondary priorities
<b>T01</b>	<b>Growing our Economy</b>		
P01	Build the right environment for East Suffolk	<input type="checkbox"/>	<input type="checkbox"/>
P02	Attract and stimulate inward investment	<input type="checkbox"/>	<input type="checkbox"/>
P03	Maximise and grow the unique selling points of East Suffolk	<input type="checkbox"/>	<input type="checkbox"/>
P04	Business partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P05	Support and deliver infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
<b>T02</b>	<b>Enabling our Communities</b>		
P06	Community Partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P07	Taking positive action on what matters most	<input type="checkbox"/>	<input type="checkbox"/>
P08	Maximising health, well-being and safety in our District	<input type="checkbox"/>	<input type="checkbox"/>
P09	Community Pride	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>T03</b>	<b>Maintaining Financial Sustainability</b>		
P10	Organisational design and streamlining services	<input type="checkbox"/>	<input type="checkbox"/>
P11	Making best use of and investing in our assets	<input checked="" type="checkbox"/>	<input type="checkbox"/>
P12	Being commercially astute	<input type="checkbox"/>	<input type="checkbox"/>
P13	Optimising our financial investments and grant opportunities	<input type="checkbox"/>	<input type="checkbox"/>
P14	Review service delivery with partners	<input type="checkbox"/>	<input type="checkbox"/>
<b>T04</b>	<b>Delivering Digital Transformation</b>		
P15	Digital by default	<input type="checkbox"/>	<input type="checkbox"/>

P16	Lean and efficient streamlined services	<input type="checkbox"/>	<input type="checkbox"/>
P17	Effective use of data	<input type="checkbox"/>	<input type="checkbox"/>
P18	Skills and training	<input type="checkbox"/>	<input type="checkbox"/>
P19	District-wide digital infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
<b>T05</b>	<b>Caring for our Environment</b>		
P20	Lead by example	<input type="checkbox"/>	<input type="checkbox"/>
P21	Minimise waste, reuse materials, increase recycling	<input type="checkbox"/>	<input type="checkbox"/>
P22	Renewable energy	<input type="checkbox"/>	<input type="checkbox"/>
P23	Protection, education and influence	<input type="checkbox"/>	<input type="checkbox"/>
<b>XXX</b>	<b>Governance</b>		
XXX	How ESC governs itself as an authority	<input type="checkbox"/>	<input type="checkbox"/>
<b>How does this proposal support the priorities selected?</b>			
Allows a council asset to be available for public display and negates the Council of ongoing financial requirements.			

## Background and Justification for Recommendation

<b>1 Background facts</b>	
1.1	The hoard was found on 3rd October 1983 during construction work on industrial units belonging to the then Suffolk Coastal District Council in Border Cot Lane, Wickham Market. The hoard was given to the Council and was then stored in the safe at the Council Offices at Melton Hill, until the Council's move to Riduna Park. With storage at a premium in the new offices, there was no safe big enough to store the hoard in, so it was loaned to the Suffolk County Council Archaeological Service within their Bury Resource Centre.
1.2	The hoard originally consisted of a pot and 1,587 bronze and silver coins, circa 270s AD (Gallienus, Tetricus, etc). However, on a count in 2015, it was discovered that there was a variance of 41 coins missing from the original count in 1983. Anecdotally, this had happened over a number of years as the coins were loaned to local groups, schools and used for staff to give talks, or a second theory is that a number of coins were purchased by the British Museum in 1984 (see letter of intent to purchase Appendix A). To ensure that the hoard and pot were protected for the future, it was determined that a long-term loan to the Archaeological Service and this took place on 18th November 2016.
<b>2 Current position</b>	
2.1	The Roman Coin Collection was valued at £3,400.00 in 2016 and now requires a valuation every 3 years to be covered by insurance. The County Archaeology Service have expressed their agreement to retain the hoard on long term loan but note that they do not insure the finds they hold (however all finds are kept in a secure environmentally controlled finds store with red line response for fire and intruder alarms). Since the hoard and pot have been loaned to the Service it has been on public display for 3 months at Moyse Hall in Bury St Edmunds, at which East Suffolk Council representatives attended the launch and publicised. Coins

	<p>from the hoard have also been used in a project to create a picture based ID guide to Roman coins by the Archaeological Service, producing drawings from photographs of coins. County have indicated that they would welcome the hoard and pot to be donated to them by East Suffolk Council.</p> <p>In consultation with Wickham Market Parish Council and the newly formed Wickham Market Archive Centre, both organisations wish for the Hoard to be donated to the Archive Centre to become one of the key items in their collection.</p>
--	--

### 3 How to address current situation

3.1	<p>The newly built Wickham Market Archive Centre has a large fire and water proof safe in which it could be stored. They have indicated that it will be included within their contents insurance, and they would like to be able to research the emperors and coins and put on exhibitions to the public, in which it would be displayed.</p> <p>The County Archaeological Service has also expressed a desire to have the Hoard donated to them, where it would be used for research and display.</p> <p>Donating to the Archive Centre would keep the Hoard locally within the District and the ward in which it was found. A caveat to the donation should be made that if the Archive Centre ceases, the Hoard is then donated directly to the County Archaeological Service.</p>
-----	---

### 4 Reason/s for recommendation

4.1	The Council has no experience or facilities for displaying the collection to the public.
4.2	Donating to either the Wickham Market Archive Centre or the County Archaeological Service negates the requirement for regular valuation and insurance by the Council and this will allow the items to have more opportunities for public display and use in research projects.
4.3	Wickham Market Parish Council are in agreement that the Hoard should be donated to the Wickham Market Archive Centre.

## Appendices

### Appendices:

<b>Appendix A</b>	Letter from the British Museum 11 September 1984
<b>Appendix B</b>	List of Coins
<b>Appendix C</b>	Photo of selection of coins in 2016

### Background reference papers:

Date	Type	Available From
12/01/23	Monument record WKM 004 initial report	<a href="#">WKM 004 - Border Cot Lane - Suffolk Heritage Explorer</a>

Appendix A – Letter from the British Museum 11 September 1984

WKM 004



# The British Museum

Department of Coins and Medals London WC1R 3BG  
Telephone 01-636 1555 ext 404

B C Y Archer LL.B  
Suffolk Coastal District Council  
Melton Hill  
Woodbridge  
Suffolk IP12 1AU

Your reference

Our reference  
AMB/AP

Date

11th September 1984

For the attention of Mr Howard

Dear Sir,

Wickham Market Coin Hoard

I am glad to say that the work of cleaning and identifying the coins has now been completed. We would now like to photograph a few of the coins, mostly the contemporary forgeries, and hope to arrange this before too long.

I attach a summary of the hoards' contents, which differs only in detail for that prepared previously by Miss Plouriez. I also enclose a copy of the manuscript catalogue of the hoard's contents.

I suggest that the hoard should be published in the occasional series of Coin Hoards for Roman Britain, published by the British Museum. We would happily undertake the strictly numismatic part of the publication, and would hope to collaborate with Miss Plouriez (for the container, circumstances of finding and possible archaeological significance).

I gather, I hope correctly, from your letter of 22nd February (MISC/5/DSH/TAK) to Miss Plouriez that the Coroner does not wish to hold an inquest, and that therefore, by implication, Suffolk County Council is the owner of the hoard. I would support Miss Plouriez's suggestion that the hoard should be placed with a Museum or Archaeological Unit for safe-keeping. Moreover as the coins from this hoard are rather better preserved than usual, and retain much of their original silvering, they could form the basis of an attractive Museum display.

Some of the coins in the hoard are numismatic interest. These are 29 coins (13 Gallienus, 2 Salonina, 1 Valerian II, 8 Claudius II, 1 Quintillus, and 4 Postumus), which are all minor varieties of the coinage of the period, and I wonder if there is any possibility of their acquisition by the British Museum.

I am sending a copy of this letter to Miss Plouriez.

Yours sincerely,

A M Burnett  
Assistant Keeper

Members of the staff of the British Museum cannot accept liability for the opinions they may express on objects submitted for identification or for information; neither can they give valuations

Inland and Overseas Telegrams: Britishmus London WC1

## Appendix B – List of coins

Emperor	D Collier	Financial Svs	Variance
	Original Count	Count 23/02/15	
Trajan Decius	1	2	-1
Volusian	1	0	1
Valerian I	24	20	4
Valerian II	2	5	-3
Gallienus (joint reign)	13	315	45
Gallienus (sole reign)	339		
Gallienus (uncertain)	8		
Salonina (Joint Reign)	6	43	-1
Salonina (Sole Reign)	27		
Salonina (Uncertain)	9		
Postumus	209	196	13
Laelian	1	0	1
Marius	8	8	0
Victorinus	426	506	-80
Tetricus I	78	112	-34
Tetricus II	13	15	-2
Claudius II	200	204	-4
Di?us Claudius	9	1	8
Quintillus	38	39	-1
Aurelian	5	5	0
Unidentified - Unknown	170	50	120
Marked as Imitation		25	-25
<b>Total</b>	<b>1,587</b>	<b>1,546</b>	<b>41</b>

**Appendix C – selection of coins and the pot from count in 2016 and images of historic storage**







**CABINET**  
**Tuesday, 05 September 2023**

<b>Subject</b>	Report of CIL Spending and the Infrastructure Funding Statement 2022-23
<b>Report by</b>	Councillor Kay Yule Cabinet Member with responsibility for Planning and Coastal Management
<b>Report Author(s)</b>	Ben Woolnough Planning Manager (Development Management, Major Sites and Infrastructure) <a href="mailto:ben.woolnough@eastsoffolk.gov.uk">ben.woolnough@eastsoffolk.gov.uk</a> 01394 444593  Nicola Parrish Infrastructure Delivery Manager <a href="mailto:nicola.parrish@eastsoffolk.gov.uk">nicola.parrish@eastsoffolk.gov.uk</a> 01502 523057
<b>Head of Service</b>	Philip Ridley Head of Planning & Coastal Management <a href="mailto:Philip.Ridley@eastsoffolk.gov.uk">Philip.Ridley@eastsoffolk.gov.uk</a>
<b>Director</b>	Nick Khan Strategic Director <a href="mailto:Nick.Khan@eastsoffolk.gov.uk">Nick.Khan@eastsoffolk.gov.uk</a>

Is the report Open or Exempt?	OPEN
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Category of Exempt	Not applicable
<b>Wards Affected:</b>	All Wards

## Purpose and high-level overview

### Purpose of Report:

1. For Cabinet to receive and note the Infrastructure Funding Statement (IFS) 2022-23, which comprises of a report on the benefits of infrastructure delivered through CIL, and includes 3 appendices, Appendix A - The Community Infrastructure Levy (CIL) Report, Appendix B - The S106 Report, and Appendix C - The Infrastructure List and to approve this document for publication, with further minor amendments to be approved by the Cabinet Member for Planning and Coastal Management.

This is a statutory document, the content of which is prescribed under Regulation 121A and Schedule 2 of the CIL Regulations 2010 (as amended). This document is required to be published on the Council CIL webpages by 31 December 2023.

Previous versions of the IFS can be viewed on the [Infrastructure Funding Statement Webpage](#).

The IFS 2022-23 is attached as **Appendix A** to this report and has been reviewed by the CIL spending Working Group and is recommended for publication.

2. For Cabinet to approve and, where appropriate, confirm the deferral or rejection of the District CIL Funding Bids (over the £50K Local CIL Fund threshold) received for the delivery of infrastructure projects to support the Local Plans growth, as recommended by the CIL Spending Working Group.

A detailed summary of the CIL funding bids received in 2023 and the recommendations made to support the planned growth is attached as **Appendix B – District CIL Funding 2022-23** to this Report.

The CIL Spending Working Group have reviewed the proposed bids and make their recommendations within this report.

‘In principle’ approval of CIL bids allows the CIL funds to be ringfenced towards the project and once all necessary documentation and planning permissions have been obtained the project can proceed without the need for further approval of Cabinet.

3. For Cabinet to approve the recommended changes to the CIL Spending Strategy in order to address the following:
  - recommendations made from the recent review of the Strategy by the CIL Spending Working Group to take into account of the local impacts of Zero-rated strategic sites;
  - to update the Strategy in the light of legislative changes;
  - to update the Strategy to ensure it is fit for purpose for 2023/4 onwards, including ongoing review arrangements; and
  - the addition of the new Heads of Terms for the CIL Spending Working Group, updated following the elections;

The CIL Spending Working Group have reviewed the strategy and the revised CIL Spending Strategy is attached as **Appendix C** to this report.

**Options:**

Failure to produce and publish the Infrastructure Funding Statement 2022-23 would place the council in breach of the CIL Regulations. There is no alternative option.

Failure to approve the use of CIL Funds to support the delivery infrastructure projects would make planned development unsupported and unsustainable, increasing journeys for services (education, waste, community facilities, etc) to alternative locations, reducing customer support/service. If planned infrastructure projects are not delivered in a timely manner this could make planned housing growth unsustainable and potentially result in refusal of planning permissions in areas where there is insufficient infrastructure to support growth.

Other unintended impacts such as increased fly tipping, poorly educated children, increased risk to health, etc could also be linked to a failure to deliver infrastructure to support growth.

Failure to review and update the CIL Spending Strategy could negatively impact on the Councils good reputation for best practice in this field.

**Recommendations:**

1. That the Infrastructure Funding Statement 2022-23 at Appendix A to the report be approved, for publication by 31 December 2023, subject to further minor financial, typographical, and presentational amendments confirmed through the Cabinet Member with responsibility for Planning and Coastal Management.
2. That the allocation of District CIL funding towards the infrastructure projects, as outlined in Appendix B to the report, be approved, and those Local CIL Fund projects approved by the CIL Spending Working Group in June 2023 be noted.
3. That the changes to the CIL Spending Strategy, as outlined in Appendix C to the report, be approved.

## Corporate Impact Assessment

**Governance:**

To ensure that best practice and good governance is adopted and applied to the Council's management of developer contributions through implementation and review of the CIL Spending Strategy. The CIL Spending Working Group are responsible for deciding the Local CIL Fund bids and for the review of District CIL Funding bids and for making recommendations to Cabinet for approval of the proposed District CIL Funding allocations. The CIL Spending Working Group also review the content of the Infrastructure

Funding Statement, which is set out through Regulation 121A and Schedule 2 of the CIL Regulations 2010 (as amended) and make the recommendation to publish this year's IFS.

**ESC policies and strategies that directly apply to the proposal:**

CIL Spending Strategy

East Suffolk Council - Waveney Local Plan

East Suffolk Council - Suffolk Coastal Local Plan

East Suffolk Council – Leisure Strategy

East Suffolk Strategic Plan Objectives: –

- Economy - Support and Deliver Infrastructure
- Communities - Maximising health, well-being, and safety in our District
- Sustainable – Optimising our financial investment and grant opportunities
- Transformation – Effective use of data
- Environment – Minimise Waste, reuse materials and increase recycling

**Environmental:**

The CIL Funding bid for improvements to the Foxhall household waste recycling centre directly meets the council's Strategic Environmental objectives to minimise waste, reuse materials and increase recycling. Other projects also allow for the expansion of education and provision to support and make our communities healthier and resilient, for example, through the delivery of modern environmentally and energy efficient early years education buildings, and through leisure, sport, play and open space projects supporting health and wellbeing.

**Equalities and Diversity:**

Environmental Impact Assessment EQIA530872203 has been completed and submitted to the Communities Team for review.

There are no identified negative impacts on those with protected characteristics.

**Financial:**

The unallocated District CIL Fund is currently holding approximately £16m (on 31 March 2023), being sufficient available funds to approve the infrastructure projects that are recommended to be either partially or fully funded through District CIL Funding in the 2023 Bid Round. The CIL Spending Working Group are mindful of the impacts of overallocation of District CIL when large, District CIL Funded infrastructure projects are in the pipeline for upcoming years. The Infrastructure Team who manages CIL collection and spend are currently self-funded from CIL Admin receipts. This is dependent on collection levels of CIL and on timely payment of CIL by developers.

**Human Resources:**

The proposals in this report do not have any material Human Resources impacts.

**ICT:**

The Exacom ‘live time’ developer contributions database is publicly available and continues to be the main back-office management system for developer contributions and the portal through which all stakeholders can understand the potential, due, received, allocated and available CIL Funds, together with details of individual amount received, allocated and spend and details of all District CIL spending. Currently the Infrastructure Team are adding the historic financial data for s106 to the system in order to fully reconcile the entire developer contribution system to the Council’s financial management system. The project will provide an overview of 30+ years of developer contributions history and activities.

**Legal:**

There is a statutory requirement to report on Developer Contributions in line with the CIL Regulations 2010 (as amended) and to spend CIL in accordance with the CIL Regulations.

**Risk:**

Failure to produce and publish the Infrastructure Funding Statement 2022-23 would place the council in breach of the CIL Regulations. There is no alternative option.

Failure to approve the use of CIL Funds to support the delivery infrastructure projects would make planned development unsupported and unsustainable, increasing journeys for services (education, waste, community facilities, etc) to alternative locations, reducing customer support/service and potentially resulting in refusal of planning permissions in areas where there is insufficient infrastructure to support the planned growth.

Other unintended impacts such as increased fly tipping, poorly educated children, increased risk to health, etc could also be linked to a failure to deliver infrastructure to support growth.

Failure to review and improve governance of developer contributions could result in poor practices and management of funding for infrastructure.

<b>External Consultees:</b>	None – However the process of identifying and reviewing infrastructure needs is ongoing beyond local plan and neighbourhood plan making. Please see EqIA for further information.
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## Strategic Plan Priorities

Select the priorities of the <a href="#">Strategic Plan</a> which are supported by this proposal: <i>(Select only one primary and as many secondary as appropriate)</i>		Primary priority	Secondary priorities
<b>T01</b>	<b>Growing our Economy</b>		
P01	Build the right environment for East Suffolk	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P02	Attract and stimulate inward investment	<input type="checkbox"/>	<input type="checkbox"/>
P03	Maximise and grow the unique selling points of East Suffolk	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P04	Business partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P05	Support and deliver infrastructure	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>T02</b>	<b>Enabling our Communities</b>		
P06	Community Partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P07	Taking positive action on what matters most	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P08	Maximising health, well-being and safety in our District	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P09	Community Pride	<input type="checkbox"/>	<input type="checkbox"/>
<b>T03</b>	<b>Maintaining Financial Sustainability</b>		
P10	Organisational design and streamlining services	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P11	Making best use of and investing in our assets	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P12	Being commercially astute	<input type="checkbox"/>	<input type="checkbox"/>
P13	Optimising our financial investments and grant opportunities	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P14	Review service delivery with partners	<input type="checkbox"/>	<input type="checkbox"/>
<b>T04</b>	<b>Delivering Digital Transformation</b>		
P15	Digital by default	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P16	Lean and efficient streamlined services	<input type="checkbox"/>	<input type="checkbox"/>
P17	Effective use of data	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P18	Skills and training	<input type="checkbox"/>	<input type="checkbox"/>
P19	District-wide digital infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
<b>T05</b>	<b>Caring for our Environment</b>		
P20	Lead by example	<input type="checkbox"/>	<input type="checkbox"/>
P21	Minimise waste, reuse materials, increase recycling	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P22	Renewable energy	<input type="checkbox"/>	<input type="checkbox"/>
P23	Protection, education and influence	<input type="checkbox"/>	<input type="checkbox"/>
<b>XXX</b>	<b>Governance</b>		
XXX	How ESC governs itself as an authority	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**How does this proposal support the priorities selected?**

The use of developer contributions for supporting the delivery of the proposed infrastructure projects helps to meet several of the corporate objects. The infrastructure projects to be funded from CIL range from increasing recycling and reuse of domestic waste, provision of early years education and improving community sport facilities. New buildings and facilities are required to meet sustainability and efficiency targets set out within the recently updated Building Regulations, together with access requirements for those with disabilities.

The expansion of education (and early years childcare), sports, and waste recycling facilities supports our communities to live sustainably, to work, to learn and develop, and to be healthy and active. By expanding and providing new facilities locally in areas of growth it also reduces the need for people to travel further for these services.

The continued work on the Exacom Developer Contributions Project will support the transformation, transparency, and electronic reporting, supports the publication of the IFS and demonstrates the golden thread between the Local Plan growth and the delivery of infrastructure. The system is future proofed to enable East Suffolk to transition to the new Infrastructure Levy at a future date.

The publication of the IFS 2022-23 supports the Council's corporate governance requirements by complying with the CIL Regulations 2010 (as amended). It is a statutory

requirement to produce the IFS annually and publish it by the 31 December, following the end of the reported financial year.

The continuous review of our developer contributions governance arrangements ensure East Suffolk Council can continue to demonstrate good practice and continue to improve the way we work and deliver services.

## Background and Justification for Recommendations

1 Background facts	
1.1	There is a statutory requirement to report on Developer Contributions in line with the CIL Regulations 2010 (as amended).
1.2	When the Local Plan is developed, all statutory infrastructure providers are consulted and asked to provide details of the estimated costs and projects required to support the planned growth. This also includes the proposed timing of projects. These projects which form part of the Infrastructure Delivery Framework of both Local Plans are now subject to annual review and are included in the Infrastructure Funding Statement (IFS). This document provides the most current details of proposed projects, costings, and timescales for delivery over the plan period. The IFS also allows for newly identified projects emerging from local plans to be captured and for projects that are no longer required to be marked as such and subsequently removed from the IFS in future years. Some of the projects offer continued delivery of the service/use of the facility well beyond the Local Plan period.
1.3	Inner Circle, the consultants appointed through the Planning Advisory Service, noted in their Improving the Governance of Developer Contributions report, that East Suffolk was <i>“demonstrating best practice across all areas that contribute to the good governance of developer contributions.” Your approach of working alongside Parish Councils to offer CIL support is particularly strong as is you use of a public facing module to share and publish developer contributions data.</i> The recommendations to further improve processes have been actioned.

2 Current position	
2.1	The current IFS reports on the period 2021-22 and is also forwards looking in terms of the Infrastructure List. The requirement for producing and publishing an annual Infrastructure Funding Statement is from the CIL Regulations 2010 (as amended).
2.2	The proposed CIL Funded projects are to be delivered in the short-term and are infrastructure projects which, when delivered, will help to ensure that new housing developments are sustainable. Considerable growth is proposed across East Suffolk and statutory services and local facilities must be able to support this planned growth.
2.3	Whilst East Suffolk is demonstrating best practice in many areas of Developer Contributions Management, there is always a need to review, evolve and improve. The CIL Spending Working Group have therefore considered and made proposed changes to the CIL Spending Strategy to reflect recognition of £0 CIL rated strategic sites impact on local projects and to reflect changes in legislation for example for

	State Subsidy Regulations, and to further improve processes in managing developer contributions. Discussions at Cabinet and full Council when the new East Suffolk CIL rates were adopted, indicated a clear steer from members for this new additional spending area in zero rates zones.
--	---

### 3 How to address current situation

3.1	Approve the IFS 2022-23 for publication prior to 31 December 2023.
3.2	Approve or reject the recommendations made in Appendix B for the allocation of District CIL funding to the listed infrastructure projects.
3.3	Approve the recommended updated CIL Spending Strategy – September 2023 which is presented as Appendix C.

### 4 Reason/s for recommendation

4.1	To meet statutory requirements.
4.2	To deliver sustainable growth.
4.3	To continue to improve and provide good services.

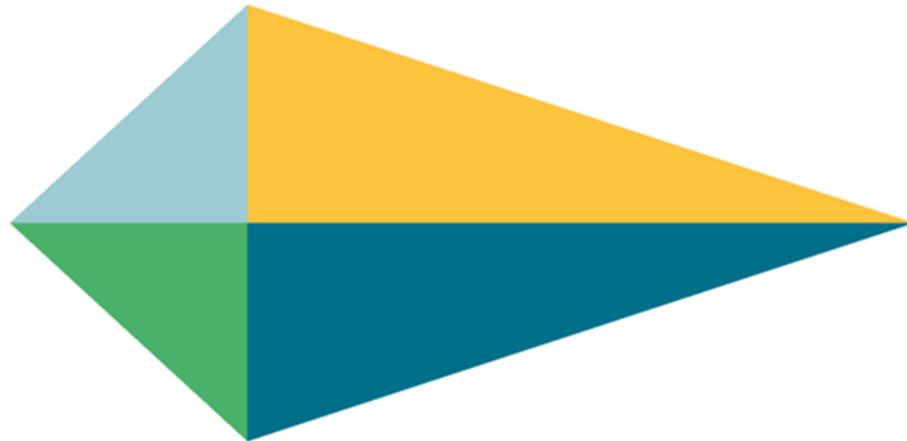
## Appendices

### Appendices:

<b>Appendix A</b>	The Infrastructure Funding Statement 2022-23
<b>Appendix B</b>	District CIL Allocations 2022-23
<b>Appendix C</b>	CIL Spending Strategy, September 2023

### Background reference papers:

Date	Type	Available From
Sept 2022	CIL Spending Strategy	<a href="#">Community-Infrastructure-Levy-Spending-Strategy.pdf (eastssuffolk.gov.uk)</a>
Sept 2019	CIL Regulations 2010 (as amended)	<a href="#">The Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019 (legislation.gov.uk)</a>
	Infrastructure Funding Statements	<a href="#">Infrastructure Funding Statement (IFS) » East Suffolk Council</a>
	Government Guidance - CIL	<a href="#">Community Infrastructure Levy - GOV.UK (www.gov.uk)</a>



**EASTSUFFOLK**  
C O U N C I L

## Infrastructure Funding Statement 2022-23



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# Delivery of infrastructure funded through CIL

## 1. District CIL Allocations and progress status

Each year we have a single bid round to allocate the District CIL funds to projects that support the planned growth in East Suffolk and the wider area. In the Autumn, the Council’s Cabinet approve the bids which will fund the projects that are coming forwards to be delivered.

At the close of the 2022-23 financial year the percentage of District CIL that has been allocated to infrastructure projects was 31.33%.

In September 2022 Cabinet approved the District CIL allocations in table 1.1 to a number of infrastructure projects.

### 1.1 District CIL Allocation 2022-23

Year Approved	Description	Allocated £
2022/23	Dennington – New bespoke Early Years Playschool (2)	£ 268,214.71
2022/23	Holton - Holton St Peter Primary School new Early Years provision (2)	415,000.00
2022/23	Lowestoft - Waste Transfer Station and Recycling Centre Improvements	751,642.00
2022/23	Leiston - 3G Pitch with Lighting	276,018.18
		<b>1,710,874.89</b>

Table 1.2 shows the position of District CIL allocated to infrastructure projects on 31 March 2023 and the status legend table indicates the status of the project through colour coding.

Status Legend	
	Projects that have not started on the work the CIL allocation relates to
	In progress projects
	Projects are completed or substantially complete
	Projects where CIL funding has been fully returned/withdrawn

## 1.2 Position of District CIL funded Infrastructure Projects at 31 March 2023

Year Approved	Description	Allocated £	Expenditure to date £	Underspend £	Balance £
2017/18	Framlingham Medical Centre extension	122,400.00	122,400.00		-
2017/18	Lowestoft - Normanston Pedestrian and Cycle Bridge Feasibility Study	120,000.00	100,008.00	19,992.00	-
2018/19	Beccles Town FC - 3G Pitch	74,500.00	74,500.00		-
2018/19	Ufford Recreation Ground Car Park Resurface	3,000.00	3,000.00		-
2018/19	Trimley St Mary - pedestrian Crossing	45,000.00	45,000.00		-
2018/19	Lowestoft - Royal Green Play Equipment and footpath improvements	123,500.00	123,500.00		-
2018/19	Easton & Letheringham Village Hall Refurbishment	38,000.00	27,084.56	10,915.44	-
2018/19	Beccles - Repair of moorings at Beccles Quay	84,000.00	84,000.00		-
2018/19	Lowestoft - East of England Park	88,000.00	88,000.00		-
2018/19	Rushmere St Andrew - Playford Road Traffic Calming	45,200.00	45,200.00		-
2018/19	Deben Estuary - Renovation of Flood Defence Wall Flood Cell 01	126,200.00	126,200.00		-
2019/20	Beccles - Lido Improvements	75,000.00	75,000.00		-
2020/21	Woodbridge - Little St Johns Street Health Centre extension and improvements	30,000.00	30,000.00		-
2018/19	Bungay Community Centre	366,460.00	366,460.00		-
2018/19	Framlingham - St Michael's Rooms Community Centre	700,000.00	700,000.00		-
2021/22	Halesworth - Edgar Sewter Primary School Expansion	1,364,272.00	1,364,272.00		-
2021/22	Bungay High School Expansion	624,070.00	624,070.00		-
2018/19	Framlingham - Walkway Routes	55,000.00	-		55,000.00
2021/22	Dennington – New bespoke Early Years Playschool (1)	1,178,252.00	1,060,426.80		117,825.20
2022/23	Dennington – New bespoke Early Years Playschool (2)	268,214.71	134,107.35		134,107.35
2018/19	Halesworth - Footpath Hill Farm Road	56,002.50	25,474.00		30,528.50
2018/19	Worlingham Community Facility Feasibility	70,000.00	23,536.70		46,463.30
2019/20	Worlingham Community Facility - Capital Cost	149,478.00	-		149,478.00

Year Approved	Description	Allocated £	Expenditure to date £	Underspend £	Balance £
2018/19	Woodbridge - Jetty Lane Community Centre Feasibility Study	188,800.00	188,800.00		-
2021/22	Foxhall Household Waste and Recycling Centre improvements	794,414.00	794,414.00		-
2021/22	Holton - Holton St Peter Primary School new Early Years provision	615,240.00	-		615,240.00
2022/23	Holton - Holton St Peter Primary School new Early Years provision (2)	415,000.00	-		415,000.00
2022/23	Lowestoft - Waste Transfer Station and Recycling Centre Improvements	751,642.00	-		751,642.00
2021/22	Halesworth - 3G Pitch and Grass Pitch	1,641,997.00	-		1,641,997.00
2022/23	Leiston - 3G Pitch with Lighting	276,018.18	-		276,018.18
2021/22	Leiston – The Leiston Surgery	90,000.00	-	90,000.00	-
		<b>10,579,660.39</b>	<b>6,225,453.41</b>	<b>120,907.44</b>	<b>4,233,299.54</b>

## 2. Completed Projects since 31 March 2022

2.1 Completed projects prior to 31 March 2022 were reported at the start of the 2021-22 Infrastructure Funding Statement (IFS). The projects described in points 2.2 to 2.7 have been completed during the 2022-23 financial year and beyond this, up to the point of writing this IFS.

### 2.2 Framlingham – Castle Community Rooms

This is a good example of a collaboratively funded infrastructure project, with funding for the project coming from several sources, including fundraising activities, as well as both District CIL and Framlingham Neighbourhood CIL. This project was mostly funded through District CIL and Neighbourhood CIL, with the District CIL allocation being £700,000.

Planning permission was granted in February 2021 and construction work commenced in January 2022. The Castle Community Rooms in Framlingham were signed off as completed on 5 January 2023 and opened for public use shortly after this date.



### 2.3 Framlingham - Walkway Routes

The aim of this project was to provide safe alternative ways of “getting around” and encourage the population to leave their cars at home for journeys in and around the town. Framlingham Town Council’s key objectives are: -

- To provide improved pedestrian and wheelchair passage throughout Framlingham to and from all public buildings and services in Framlingham.
- To improve safety and reduce the risk of accidents.
- To improve the environment by encouraging non car modes of transport.
- To phase the introduction in line with housing development and the availability of funding.

The original project consisted of:

- Pigs Meadow footpath from New Rd to College Rd **(completed)**
- New pedestrian crossing on Station Rd **(completed and funded by s106 monies)**
- New pedestrian crossing on College Rd **(no longer feasible)**
- 2 pedestrian refuge islands at Pembroke Rd and Victoria Mill Rd



In January 2021, Framlingham Town Council asked Suffolk County Council Highways to look at alternative options to the new pedestrian crossing on College Road, due to concerns about the loss of some important on-street parking. Suffolk County Council Highways engineers have reviewed the junction of Pembroke Road and Saxstead Road to produce a design that would secure a safe crossing point and to slow traffic in this area. Works were commenced in the spring of 2023 and have now been completed.



## 2.4 Halesworth – Edgar Sewter Primary School Expansion

This is a project that is linked to the planned housing growth in the Halesworth and Holton area. The expansion of Edgar Sewter Primary School will provide a further 105 primary school places (from 315 places to 420) to meet the demand for school places from local children arising from the new housing in the catchment area.

This primary school project will provide:

- 2 new class bases and expansion of an existing classroom;
- a Library;
- unisex WC;
- a Special Education Needs (SEN) resource room and other required smaller rooms;
- additional hard play area; and
- additional cycle/scooter parking

The project was commenced on site in early December 2021. The internal areas were completed first, to allow access in time for September 2022 and the start of the new school year. The project was commenced on site in early December 2021. The internal areas were completed first, to allow access in time for September 2022 and the start of the new school year. The project completed in October 2022.



## 2.5 Bungay High School Expansion

This is a project that is also linked to the planned housing growth in Halesworth, Bungay and the wider rural area; the Bungay High School expansion project will provide a further 150 places for ages 11-16.

The expansion works will include a new standalone block on the school site and the remodelling of existing school spaces. The accommodation to be provided is Information Technology class bases and a dining space with new kitchen. In addition to the new accommodation, the external areas will be developed to support the expansion. This will address the expansion needs for housing growth within the school catchment area and provide places for the number of new secondary school pupils generated from this.

Commencement on site occurred on 4 January 2022 and the project completed in January with an opening event held in February 2023.



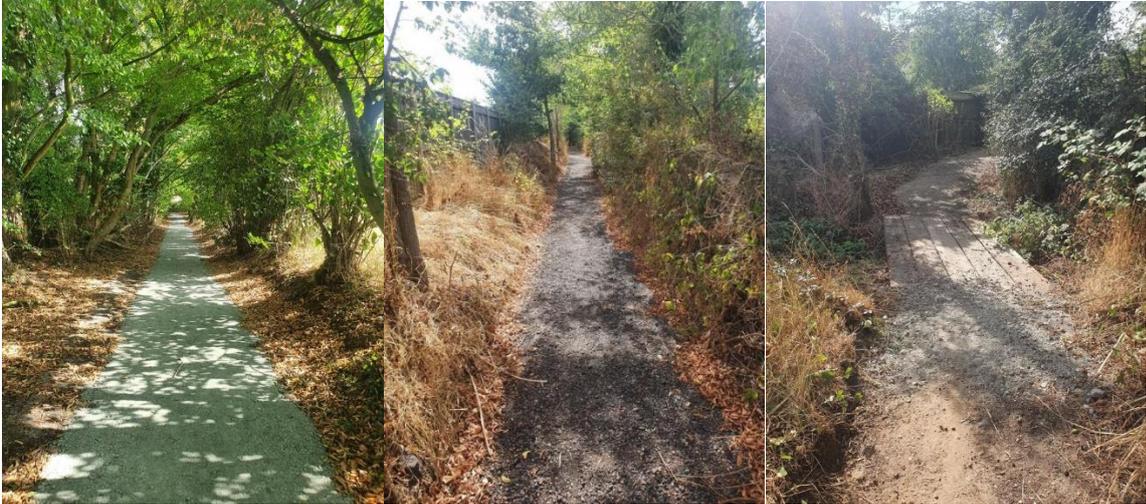
**2.6 Worlingham Community Centre – Feasibility Study**

Pre-construction costs have been funded during this feasibility stage of the project. The aim of the project is to build a village hall on the former site of the Worlingham Primary School. The development of the new Community Centre has recently commenced at the start of June 2023.

**2.7 Halesworth - Footpath Hill Farm Road**

Suffolk County Council Public Rights of Way team have investigated the option to upgrade the path to enable cycling/bridleway use. But due to site constraints at each end of the path this could not be achieved. Therefore, this project provides an improvement to the existing network with better connectivity to the town centre, to Holton St Peter Community Primary School and sports ground and playing field, but it remains a traditional public right of way footpath as opposed to a foot/cycle route.

The footpath works were completed in the summer of 2022.



### 3. Projects in progress

#### 3.1 Worlingham Community Centre – Capital Works

This project commenced at the start of June 2023 with clearance of the existing site. The project is expected to complete in September 2024.



#### 3.2 Dennington – New bespoke Early Years playschool building

The Dennington Early Years project will provide a new, stand alone, bespoke Early Years Playschool building for Dennington and the wider area, including serving the needs of Framlingham, where significant housing growth has taken place in recent years. Some new housing development is also proposed within Dennington itself. The Little Oaks Playschool will also serve a wide rural catchment area. The service will be run by Badingham Playschool, who currently provide their service via the Scout Rooms in Framlingham and periodically at other locations. The playschool currently provides a service to 40 Children, with 40% of them coming from Framlingham itself. The Playschool also employs 11 staff.



The building works commenced in May 2022 with the implementation of services to the site. The project is progressing well and in April a Topping out ceremony was undertaken to celebrate this key stage of the development. The playschool is almost completed, at the time of writing, and will open to children in September 2023.

### 3.3 Foxhall Household Waste and Recycling Centre improvements

This four-stage project commenced on 17 November 2022.

**Phase 1**, which includes a new Reuse Shop area, was completed in April 2023.

**Phase 2** is currently in progress and once it is completed, this will mean that the public will be able to use half of the new site, including half of the new split level recycling area. Phase 2 is due to complete 4 July 2023.

**Phase 3a** will complete in September and will include the highway work (with night works involved) to add the feeder right hand lane to access the site and works to widen the entrance to site.

**Phase 3b** will commence in September through to December 2023, with the whole site to be formally opened in January 2024 (to be agreed).

This is a link to recent drone footage of the construction works on the site:

<https://youtu.be/F8jecFvY6M0>

The completed site should still look like this:



### 3.4 Holton St Peter Primary School – Early Years Provision

This project will provide an additional 30 full time equivalent early years places for children from the age 2 at Holton St Peter Primary School. The additional accommodation will provide:

- Classroom/activity space for up to 30 EYFS pupils at any one time
- Pupil and staff toilets
- Office and ancillary space

The provision will be open for full day care to meet the needs of working families as well as providing funded sessions. Children who attend high quality early years provision are better able to achieve their full potential.

The construction project commenced on 9 May and is currently on track for completion in October 2023, with the building opening in January 2024.



## 4. Timescales for other CIL funded projects

Project	Proposed start date
Lowestoft - Waste Transfer Station and Recycling Centre Improvements	Delayed - technical assessment in progress
Leiston 3G Pitch	July 2023
Halesworth 3G and Grass Pitch	January 2024

# Delivery of Affordable Housing

## 5. About affordable housing in East Suffolk

- 5.1 The National Planning Policy Framework requires Local Planning Authorities to reflect the needs for affordable housing within their planning policies.
- 5.2 Policies in the Local Plans require new developments (with capacity for eleven units or more in the Waveney Local Plan area and ten units or more in Suffolk Coastal Local Plan area) to make provision for affordable dwellings. Across East Suffolk viability testing has identified that affordable housing can be provided on viable sites in the range of 20%-40% as a proportion of homes, dependent on location. The Waveney Local Plan and Suffolk Coastal Local Plan reflect the relevant evidence for the area. The policies expect provision to be made on-site, other than in exceptional circumstances. In such cases it may be agreed that a commuted sum could be paid towards provision of affordable housing off-site.
- 5.3 Planning obligations secured through s106 (legal) agreements are used in relation to secure on-site affordable housing or off-site contributions in lieu of affordable housing provision. Historic legal agreements providing for affordable housing contributions may restrict the location in which the contribution is spent to deliver affordable homes. Focus is given to delivering affordable homes in areas of greatest need.
- 5.4 Where affordable housing units cannot be provided on site, affordable housing commuted sums may be agreed. The latest rates to apply can be found on the developer contributions s106 webpages.

[Section 106 planning obligations \(S106\) » East Suffolk Council](#)

- 5.5 The CIL Regulations do not permit CIL to be spent on delivering affordable housing.

## 6. Reporting on delivery of affordable housing

- 6.1 Affordable Homes that are secured through s106 are not infrastructure and therefore are not reported through the Infrastructure List. Information on the delivery of Affordable Homes is included in the Council's annual Authority Monitoring Report:

[Open data, monitoring and housing supply » East Suffolk Council](#)

In 2022-23, part funding was provided towards 6 new affordable units and further funding from S106 contributions was also used towards the 42 new affordable dwellings at Deben High School, Felixstowe that was a project that had been allocated S106 funding in 2021-22.

# Appendix A - The CIL Report

## 1. CIL Charging Schedules

- 1.1 Two CIL charging schedules were originally approved for East Suffolk, one covering the Waveney area and the other covering the Suffolk Coastal area. They were both in operation during the 2023-24 financial year. East Suffolk Council has recently approved a new East Suffolk CIL Charging Schedule which set CIL Rates across the whole district. These new CIL Rates are effective from 1 August 2023.

[East Suffolk CIL Charging Schedule » East Suffolk Council](#)

- 1.2 The Infrastructure Funding Statement (IFS) reports singularly on developer contributions across the whole of the East Suffolk area.

## 2. Legislative Requirements

- 2.1 The CIL Report is a report about CIL collection allocation and spending, in relation to the 2022-23 financial year, which includes the matters specified in paragraph 1 of Schedule 2 of the CIL Regulations 2010 (as amended).

## 3. Bought Forward CIL Balances and CIL Income

- 3.1 Table 1 shows the amount of Neighbourhood CIL (NCIL) held for Parish Meeting Areas (£9,072.62) that was carried over into the 2022-23 financial year which is not yet allocated to infrastructure projects by East Suffolk in areas where there is no parish council.
- 3.2 The amount of NCIL that is received between 1 October 2021 and 31 March 2022 is allocated or paid to parish councils in April 2022. This amount, £595,508.49, is therefore included below as a bought forward figure. This amount includes any parish meeting NCIL that has yet to be allocated as the April 2022 NCIL.
- 3.3 The amount of CIL admin for 2021-22 was assessed, allocated and spent by the end of 31 March 2022 and so this does not show as a bought forward figure for the reported financial year. Details of the income, allocation and spend of CIL admin for the previous financial year were included in the 2021-22 IFS. For clarity, Tables 2, 3 and 4 provide details of the CIL income, allocation and spend information for 2022-23.

**Table 1 - Bought Forward Balances**

Type of CIL	£
CIL Admin	0.00
NCIL held for Parish Meeting Areas	9,072.62
Unallocated NCIL received during 2022-23 and allocated and/or paid as April 2023 NCIL Payment	595,508.50
District CIL (available to allocate)	12,615,403.13
District CIL (allocated to infrastructure projects and not yet spent)	4,673,813.60
<b>Total CIL brought forward into 2022-23</b>	<b>17,893,797.85</b>

3.4 In the 2022-23 financial year the CIL Demand Notices issued totalled £11,417,329.06.

3.5 Table 2 details the amount of CIL, in the 3 statutory pots, received during the 2022-23 financial year.

**Table 2 – CIL Income**

Type of CIL	£
CIL Admin	339,617.19
Neighbourhood CIL	1,061,923.58
District CIL	5,390,802.04
<b>Subtotal – Total CIL</b>	<b>6,792,342.81</b>
Financial Adjustments (Interest added to District CIL Fund 31 March 2023)	69,409.89
<b>Total CIL income 2022-23</b>	<b>6,861,752.70</b>

#### 4. CIL Allocations and CIL Admin spend

##### 4.1 Allocating CIL collected before 1 April 2022

Table 3 provides details of the District CIL which was collected by the authority before the end of 2021-22 that has been allocated during the 2022-23 financial year. Section 1 of the Infrastructure Funding Statement for 2022-23 provides more details of District CIL expenditure and the remaining balances of the allocations of District CIL made up to the 31 March 2023.

**Table 3**

Project	Approved Allocation £
Dennington – New bespoke Early Years Playschool setting (2 <sup>nd</sup> Bid)	268,214.71
Holton - Holton St Peter Primary School new Early Years provision (2 <sup>nd</sup> Bid)	415,000.00
Lowestoft - Waste Transfer Station (WTS) and Recycling Centre (RC) Improvements	751,642.00
Leiston - 3G Pitch with Lighting	276,018.18
<b>Total</b>	<b>1,710,874.89</b>

##### 4.2 Neighbourhood CIL (NCIL) Payments allocated to parish councils/meetings

Table 4 provides details of the District CIL which was collected by the authority before the end of 2021-22 that has been allocated during the 2022-23 financial year.

**Table 4**

<b>NCIL Allocation Type</b>	<b>£</b>
NCIL passed to town/parish councils by 28 April 2022	591,361.41
NCIL passed to town/parish councils by 28 October 2022	749,746.86
<b>subtotal</b>	<b>1,341,108.27</b>
NCIL allocated to Parish meetings by 28 April 2022	4,147.09
NCIL allocated to Parish meetings by 28 October 2022	0.00
<b>Total NCIL allocations 2022-23</b>	<b>1,345,255.36</b>

A full breakdown of Neighbourhood CIL receipts and allocations can be found on the CIL reporting webpage and can also be seen on the developer contributions database:

[CIL reporting » East Suffolk Council](#)

[East Suffolk PFM - CIL \(exacom.co.uk\)](#)

#### 4.3 CIL Admin Expenditure 2022-23

CIL Admin fees are allocated spent within the year that they are received in order to fund the collection, recovery, spend and management of developer contributions. Table 5 - Infrastructure Team income and expenditure lists the breakdown of the expenses that CIL Admin contributes towards, together with details of the other income streams that also support the delivery of developer contributions service.

**Table 5 – Infrastructure Team income and expenditure**

<b>Income or Expenditure</b>	<b>£</b>
Total Direct Employee Expenses	246,432.56
Total Other Employee Expenses	5,057.79
Total Transport Expenses	329.64
Total Supplies & Services	3,457.65
Total Support Services	62,127.95
CIL Charging Schedule costs	41,153.40
<b>Total Expenses</b>	<b>358,558.99</b>
CIL Admin Income 2022-23	339,617.19
CIL Advice Fees 2022-23	444.00
s106 Monitoring Fees	17,811.80
s106 Advice Fees 2022-23	686.00
<b>Total Income</b>	<b>358,558.99</b>

## 5. Other Matters

- 5.1 To date CIL has not been used to repay borrowing to deliver infrastructure.
- 5.2 CIL has not been spent in areas where there is no parish area (Parish Meetings) as the amount collected for these areas is very small and no relevant projects have yet been identified.
- 5.3 No Land payments in lieu of CIL have been accepted in 2022-23.
- 5.4 As of 31 March 2023, only one clawback notice, in accordance with regulation 59E, had been issued where South Elmham All Saints And St Nicholas Parish Council failed to spend their NCIL within the 5-year statutory period. The £291.76 has been returned and has been re-allocated and spent on providing a new Notice board within that parish area during the 2022-23 financial year.
- 5.5 Where large infrastructure projects that are delivered by statutory providers are in the latter stages of development and applications for CIL funding are presented for validation, the ringfencing of Strategic CIL will be approved by the CIL Spending Working Group, pending finalisation and final approval and allocation of project funding as projects reach delivery stage.
- 5.6 The CIL Spending Strategy, approved in January 2020, and further updated on 5 September 2023, is available to view on the CIL spending webpage. The CIL Spending Working Group have made recommendations to Cabinet in September 2023 for the approval of District CIL funded projects and to also report on the Local CIL Fund Allocations that have been approved through the CIL Spending Working Group. Many of the Local CIL projects will have been identified as part of Neighbourhood Plans or from reviewing local infrastructure needs in areas where a Neighbourhood Plan has not been adopted.
- 5.7 A review of the CIL Spending Strategy has been conducted by the CIL Spending Working Group during the summer of 2023 and recommended changes are presented to Cabinet in September 2023 for approval to adopt.
- 5.8 The allocation and progress of Local CIL Fund projects will be reported in the 2023-24 Infrastructure Funding Statement, alongside those other infrastructure projects approved for District CIL Funding to East Suffolk Cabinet in September 2024.

## 6. 2022-23 closing balances

- 6.1 Table 6 shows the closing balances for unspent CIL at close of 31 March 2023.
- 6.2 The Infrastructure List, which forms part of this Infrastructure Funding Statement, identifies the projects which are a priority to be delivered in the short term, through partial or full District CIL funding. East Suffolk Council works with all the statutory partners, meeting at least on a quarterly basis, to ensure that the infrastructure providers are aware of the developments coming forwards and are preparing the infrastructure projects that need to be delivered through funding from CIL. This also helps to ensure the Infrastructure List is current

and reflects latest estimated costs. The CIL Spending Strategy ensures that priority is given to the critical and essential infrastructure projects so that there are no delays to delivery of this infrastructure and there is sufficient District CIL available to allocate.

**Table 6**

<b>Fund</b>	<b>£</b>	<b>Notes</b>
CIL Admin	0.00	Allocated and spent by 31.03.23 (Table 5)
NCIL (Parish Meetings)	13,219.71	Funds held for Parish Meeting Areas
Unallocated NCIL	309,813.80	This is allocated and transferred to town and parish councils, and allocated to parish meetings, by 28 April 2023
District CIL (available to allocate)*	16,447,266.44	The CIL Spending Working Group will be considering which projects are a priority for receiving District CIL funding and making recommendations to Cabinet in September 2023. This balance includes DCIL interest added 31.03.2023
District CIL (previously allocated to infrastructure projects and not yet spent)	4,233,299.54	See the full list of projects in Section 1 of this document. The CIL Spending Working Group made decisions on Local CIL projects in June 2023 and made recommendations to Cabinet on the larger infrastructure projects on 5 September 2023.
<b>Total</b>	<b>21,003,599.49</b>	

\*includes Local CIL Fund element of the District CIL Fund.

## Appendix B - The s106 Report

### 1. S106 contributions in East Suffolk

- 1.1 The use of planning obligations secured through s106 (legal) agreements is in relation to securing onsite affordable housing, off-site contributions in lieu of affordable housing provision and site-specific mitigation required for new developments.
- 1.2 A s106 Agreement may also be used to secure contributions towards new schools (as these are not delivered through CIL) and may sometimes include s278 Highways mitigation works or contributions to secure highways improvements and green travel plans.
- 1.3 Whilst East Suffolk may be a lead party within a s106 Agreement, it is often the case that contributions are received directly by Suffolk County Council, as the Education Authority or Highways Authority, for example. Suffolk County Council will report on these s106 contributions, together the number of school places secured, within the Suffolk County Council Infrastructure Funding Statement 2022-23.

[Infrastructure Funding Statements | Suffolk County Council](#)

### 2. Brought forward s106 funds

- 2.1 Table 1 shows the total amount of S106 money held by East Suffolk on 1 April 2022 (bought forward balances).

**Table 1**

<b>Contribution Type</b>	<b>Amount</b>
East Suffolk RAMS (Habitat Mitigation) *	£814,200.23*
Affordable Housing	<b>£2,668,972.68</b>
Air Quality (Felixstowe South Reconfiguration)	£7,662.97
Landguard (Felixstowe Port S106)	£79,470.92
Playing Fields	£1,157.97
Former Waveney Open Space	<b>£67,649.71</b>
Woods Meadow Country Park	£154,041.25
Play equipment	£216,161.61
Refuse	£21,394.83
Community facilities	£372,784.08
Former Suffolk Coastal Play space***	<b>£449,093.71</b>
Former Suffolk Coastal Sport***	<b>£887,769.61</b>
Footpaths and Cycleways	£12,894.70
Committed sums for Maintenance**	£465,046.90
<b>Total***</b>	<b>£6,218,301.17</b>

\* RAMS contributions are collected under Habitats Assessment Regulations and required in line with the Recreational Disturbance Avoidance & Mitigation Strategy for Ipswich Borough,

Babergh District, Mid Suffolk District and East Suffolk Councils. RAMS contributions are automatically allocated to the RAMS project and will be spent to deliver strategic mitigation through the RAMS Executive Group. The figure reported above includes upfront payments made towards RAMS on planning applications approved prior to 1 April 2022 and S106 contributions paid prior to 1 April 2022. Further information can be found here:

<http://www.eastsuffolk.gov.uk/planning/developer-contributions/rams/>

\*\* Commuted Maintenance sums are proportionately allocated over a 5 or 10-year period according to the requirements detailed within each legal agreement. The Commuted Sums for Maintenance brought forward figure in Table 1 is technically an allocated figure but has been included here in the interests of transparency.

\*\*\* Brought forward balances have been adjusted from those reported at year end last year as follows:

- i. East Suffolk RAMS has been adjusted from the 2021-22 year end figure following updated reporting. The nature of upfront payments for RAMS results in continuous movement of balances. Once development has commenced, the payment becomes available for spend and is fixed. The spendable balance is reported below table 5
- ii. Former Suffolk Coastal Play space and Sport have been adjusted from the 2021-22 year end figure following further review and correction.

While historic data is loaded into the new developer contributions database, it is possible balances will be further adjusted to reflect any new information that becomes available.

### 3. New agreements entered into during 2022-23

- 3.1 The total amount of money to be provided under any planning obligations which were entered into during the reported year, excluding the Sizewell C Deed of Obligation, is £2,373,579.09. This figure includes the maximum amount (before indexation) expected where the total number of dwellings are not yet known, monies to be paid to other authorities and the minimum amount (before indexation) expected where a minimum amount only is specified. Totals for the Sizewell C Deed of Obligation are reported in Table 2b.
- 3.2 The total number of affordable housing units to be provided under any planning obligation entered into during the reported year is 173. This figure includes the maximum number expected where the total number of dwellings are not yet known.
- 3.3 There were no non-monetary contributions secured in relation to educational facilities, however, a number of planning obligations for financial contributions towards new facilities and school places were entered into, resulting in school places secured as follows:
  - 13 Early Years Places
  - 24 Primary School Places
  - 10 Secondary School Places

The contribution amount secured is set out in Table 2a.

3.4 A list of planning obligations entered into during the report year has been included in Table 2a below. Agreements can be viewed in full on the relevant planning application via the Council's website:

**Table 2a**

<b>Planning Reference</b>	<b>Obligation Type</b>	<b>Number (on site)</b>	<b>Amount</b>
DC/15/1128/OUT (Deed of Variation – additional obligations)	Additional affordable housing (First Homes provided under the Early Delivery Programme)	12	
DC/16/1992/FUL (Deed of Variation – additional obligations)	Additional Affordable Housing (increase from 22 to 47 units)	25	
	RAMS contribution		£15,097.34
DC/21/5492/FUL (Deed of Variation to DC/18/2212/FUL – additional obligations)	Additional Affordable Housing (increase from 10 to 19 units)	9	
	RAMS contribution		£6,103.18
DC/19/3916/OUT	RAMS contribution		*£12,527.58
	Affordable Housing	*13	
	Pre-school Contribution		£41,016.00
	Primary School Contribution		£82,032.00
	Secondary School Contribution		£74,787.00
	Bus Stop Improvements		£17,000.00
	Public Rights of Way Contribution		£15,000.00
DC/20/1831/OUT	RAMS contribution		*£17,667.10
	Affordable Housing	*18	
	Pedestrian Link Contribution		£10,000.00
	Secondary School Contribution		£184,562.00
DC/20/5181/OUT	RAMS contribution		*£32,122.00
	Affordable Housing	*33	
	On site public open space		
	Public Rights of Way Contribution		£32,600.00
	Cycle Improvement Contribution		£30,000.00
	Public Transport Contribution		£25,000.00
DC/21/0027/FUL	Travel Plan Evaluation and Support Contribution		£1,000.00
	RAMS contribution		£32,122.00
	Footpath Contribution		£62,000.00
	Provision of temporary Sports Pitches		
	On site amenity Space		
DC/21/0541/FUL	Restrictive Covenants		
	Early Years New Build Contribution		£130,644.00
DC/21/0757/FUL	Primary New Build Contribution		£195,966.00
	RAMS contribution		£5,139.52

Planning Reference	Obligation Type	Number (on site)	Amount
	Affordable Housing	5	
	Primary School Transport Contribution		£16,870.00
	Secondary School Transport Contribution		£18,075.00
DC/21/1166/FUL	RAMS contribution		£3,212.20
	Affordable Housing	10	
	SUDS provision		
DC/21/2679/FUL	RAMS contribution		£20,879.30
	Affordable Housing	20	
	Primary School Transport Contribution		£126,525.00
	Secondary School Transport Contribution		£66,275.00
	On site public open space		
DC/21/3016/FUL	RAMS contribution		£25,697.60
	Affordable Housing contribution		£639,952.00**
	Permissive Path Provision		
	Restrictive Covenants		
DC/21/3441/FUL	Restrictive Covenants		
DC/21/4652/FUL	Restrictive Covenants		
DC/21/5699/FUL	NHS Contribution		£16,500
DC/22/0479/FUL	Restrictive Covenants		
DC/22/0991/FUL	RAMS contribution		£6,094.50
	Affordable Housing	17	
	Early Years Contribution		£108,870.00
	Primary School Contribution		£ 239,514.00
	Off-site Play Space Contribution		£ 51,607.07
	On site public open space		
DC/22/2519/FUL	Restrictive Covenants		
DC/21/4745/FUL (not permitted during 2022-23)	RAMS contribution		£ 11,242.70
	Affordable Housing	11	
	Permissive Path Provision		
	On site public open space		

\* Denotes a maximum number/amount where number of dwellings is not yet known.

\*\* Denotes a minimum amount.

During 2021-22, the Deed of Obligation relating to Sizewell C was completed, however, the Development Consent Order (and therefore the date the obligations to East Suffolk Council came into effect) was granted during 2022-23. The financial obligations contained within that Deed are listed in Table 2b below:

**Table 2b**

CONTRIBUTION	TOTAL	RECIPIENT(\$)	PHASING	
			Linked to Commencement Date	Other
Schedule 2, paragraph 2: East Suffolk Council Officer Support	£1,796,034	East Suffolk Council	<p>£178,409 on or before Commencement</p> <p>£120,940 annually on each anniversary of the Commencement Date during the Construction Period</p> <p>£57,479 annually on each anniversary of the Commencement Date for the first six years of construction</p>	
Schedule 2, paragraph 3: Suffolk County Council Officer Support	£1,788,000	Suffolk County Council	<p>£204,000 on or before Commencement</p> <p>£144,000 annually on each anniversary of the Commencement Date during the Construction Period</p>	
Schedule 2, paragraph 4: SZC	£3,600,000	East Suffolk Council	£150,000 on or before Commencement	

CONTRIBUTION	TOTAL	RECIPIENT(S)	PHASING	
Support Contributions			£150,000 annually on each anniversary of the Commencement Date during the Construction Period	
		Suffolk County Council	£150,000 on or before Commencement £150,000 annually on each anniversary of the Commencement Date during the Construction Period	
Schedule 2, paragraph 5.1: Noise and Air Quality Monitoring	£93,412	East Suffolk Council	£10,000 on or before Commencement £10,748 on the first three anniversaries of the Commencement Date during the Construction Period £10,233.60 on the fourth to eighth anniversaries of the Commencement Date during the Construction Period	
<i>Schedule 2, paragraph 5.4: Noise and Air Quality Monitoring Contingency</i>	<i>£348,734.40</i>	<i>East Suffolk Council</i>		<i>Up to £348,734.40 as and when approved by the Environment Review Group or the Transport Review Group</i>

CONTRIBUTION	TOTAL	RECIPIENT(S)	PHASING	
Schedule 2, paragraph 6: Public Information Portal	£25,000	East Suffolk Council	£25,000 on or before Commencement	
Schedule 3, paragraph 2: Housing Fund	£11,877,975	East Suffolk Council	<p>£220,000 on or before Commencement</p> <p>£220,000 on or before the first six anniversaries of the Commencement Date</p> <p>£500,000 on or before the first anniversary of the Commencement Date</p>	<p>£2,000,000 no later than one month following the date of the approval of the Private Housing Supply Plan by the Accommodation Working Group</p> <p>£1,139,661 on each anniversary of the date of the approval of the Private Housing Supply Plan prior to and including the sixth anniversary of that date</p> <p>£100,000 no later than one month following the date of the approval of the Tourist Accommodation Plan</p> <p>£81,819 on each anniversary of the date of the approval of the Tourist Accommodation Plan occurring during the Construction Period</p>
<i>Schedule 3, paragraphs 3.1 and 4: Housing Contingency Fund (East Suffolk Council)</i>	<i>£10,140,000</i>	<i>East Suffolk Council</i>	<i>Up to £1,050,000 between the second anniversary of the Commencement Date and the end of the Construction Period as requested by the</i>	<p><i>Up to £4,020,000 determined in accordance with paragraph 4.1.4, in the event of a breach of paragraph 4.1.1(8)</i></p> <p><i>Up to £4,020,000 determined in accordance with paragraph</i></p>

CONTRIBUTION	TOTAL	RECIPIENT(S)	PHASING	
			<i>Accommodation Working Group on an annual basis</i>	<i>4.1.4, in the event of a breach of paragraph 4.1.1(C)  Up to £1,050,000 determined in accordance with paragraph 4.2.3, in the event of a breach of paragraph 4.2.1(8)</i>
<i>Schedule 3, paragraph 3.2: Housing Contingency Fund (Suffolk County Council)</i>	£216,823	<i>Suffolk County Council</i>		<i>Up to £216,823 determined in accordance with paragraph 3.2 in the event that a residential care home closes as a result of the Project</i>
Schedule 4, paragraph 3: Police Contribution	£8,000,000	Suffolk County Council (for onward payment to the Suffolk Constabulary)	<p>£227,142.08 on or before Commencement</p> <p>£326,657.08 on or before the first anniversary of the Commencement Date</p> <p>£923,747.08 on or before the second anniversary of the Commencement Date</p> <p>£923,747.08 on or before the third anniversary of the Commencement Date</p> <p>£923,747.08 on or before the fourth anniversary of the Commencement Date</p> <p>£1,023,262.08 on or before the fifth</p>	

CONTRIBUTION	TOTAL	RECIPIENT(S)	PHASING	
			anniversary of the Commencement Date £1,023,262.08 on or before the sixth anniversary of the Commencement Date £923,747.08 on or before the seventh anniversary of the Commencement Date £923,747.080 on or before the eighth anniversary of the Commencement Date £326,657.08 on or before the ninth anniversary of the Commencement Date £227,142.08 on or before the tenth anniversary of the Commencement Date £227,142.08 on or before the eleventh anniversary of the Commencement Date	
Schedule 4, paragraph 4: Fire and Rescue Service Contribution	£1,441,705.60	Suffolk County Council for the provision of the Suffolk Fire and Rescue Service	£60,914.88 on or before Commencement £35,914.88 on or before the first anniversary of the Commencement Date	

CONTRIBUTION	TOTAL	RECIPIENT(S)	PHASING	
			<p>£47,993.20 on or before each of the second, third, fourth and fifth anniversaries of the Commencement Date</p> <p>£72,993.20 on or before the sixth anniversary of the Commencement Date</p> <p>£47,993.20 on or before the seventh anniversary of the Commencement Date and each subsequent anniversary of the Commencement Date during the Construction Period</p>	
			<p>£5,663.32 on or before Commencement and on each subsequent anniversary of the Commencement Date throughout the Construction Period</p>	
			<p>£64,332 on or before Commencement and on each subsequent anniversary of the Commencement Date throughout the Construction Period</p>	

CONTRIBUTION	TOTAL	RECIPIENT(S)	PHASING	
Schedule 4, paragraph 5: Ambulance Service Contribution	£750,000	Suffolk County Council (for onward payment to the East of England Ambulance Service NHS Trust)	<p>£23,158 on or before Commencement and on or before the first anniversary of the Commencement Date</p> <p>£33,926 on or before the second anniversary of the Commencement Date and on or before each subsequent anniversary of the Commencement Date during the Construction Period</p> <p>£20,202 on or before Commencement and or before each anniversary of the Commencement Date during the Construction Period</p> <p>£122,000 on or before the second anniversary of the Commencement Date</p>	
Schedule 4, paragraph 6: Resilience Contributions	£100,000	Suffolk County Council (for onward payment to the Royal National Lifeboat Institution and East Anglian Air Ambulance)	<p>£50,000 on or before Commencement</p> <p>£50,000 on or before Commencement</p>	

CONTRIBUTION	TOTAL	RECIPIENT(S)	PHASING	
Schedule 4, paragraph 7: Police Reserve Fund	£1,500,000	Suffolk County Council (for onward payment to the Suffolk Constabulary)		<p>£80,000 if the number of Estimated NHB Investigations is equal to or greater than the Budgeted NHB Investigations plus 32 (the Investigation Trigger); and</p> <p>£80,000 for every subsequent increment of 65 Estimated NHB Investigations above the Investigation Trigger unless otherwise advised by Suffolk Constabulary that this payment is deferred to subsequent Construction Years.</p>
Schedule 4, paragraph 8: Emergency Services Contingency Contribution	£446,548	<p>East Suffolk Council</p> <p>Suffolk County Council</p> <p>Suffolk County Council (for onward payment to Suffolk Constabulary, Suffolk Fire and Rescue and East of England Ambulance Service NHS Trust)</p>		Up to £446,548 upon approval by SZC Co of a request from East Suffolk Council or Suffolk County Council as appropriate with maximum liability set in relation to different scenarios.
Schedule 4, paragraph 9: Suffolk Constabulary Facilities Contribution	£450,000	Suffolk County Council (for onward payment to the Suffolk Constabulary)	<p>On or before Commencement the sum of £185,000</p> <p>On or before Commencement and on or before each anniversary of the Commencement Date occurring during the</p>	

CONTRIBUTION	TOTAL	RECIPIENT(\$)	PHASING	
			Construction Period, the sum of £22,083	
Schedule 5, paragraph 2.1: Public Services Resilience Fund (Community Safety Resilience Measures)	£1,908,392	Suffolk County Council	<p>£128,032 within 3 months of the Commencement Date</p> <p>£88,133 on or before the first anniversary date of the Commencement Date</p> <p>£127,526 on or before the 1 May following the second anniversary of the Commencement Date</p> <p>£160,524 on or before the 1 May following the third anniversary of the Commencement Date</p> <p>£222,419 on or before the 1 May following the fourth anniversary of the Commencement Date</p> <p>£247,158 on or before the 1 May following the fifth anniversary of the Commencement Date</p> <p>£276,521 on or before the 1 May following the sixth anniversary of the Commencement Date</p> <p>£235,557 on or before the 1 May following the</p>	

CONTRIBUTION	TOTAL	RECIPIENT(\$)	PHASING	
			seventh anniversary of the Commencement Date £170,090 on or before the 1 May following the eighth anniversary of the Commencement Date £94,244 on or before the 1 May following the ninth anniversary of the Commencement Date £83,907 on or before the 1 May following the tenth anniversary of the Commencement Date £74,281 on or before the 1 May following the eleventh anniversary of the Commencement Date	
Schedule 5, paragraph 2.2: Public Services Resilience Fund (Local Community Safety Measures)	£1,601,960	East Suffolk Council	£395,324 within 3 months of the Commencement Date or on or before the 1 May following Commencement (if earlier) £128,331 annually from the first anniversary of the Commencement Date until the sixth anniversary of the Commencement date on or before each 1 <b>May</b>	

CONTRIBUTION	TOTAL	RECIPIENT(S)	PHASING	
			£87,330 annually from the seventh anniversary of the Commencement Date until the end of the Construction Period on or before each 1 May	
Schedule 5, paragraph 2.3: Public Services Resilience Fund (Social Care Resilience Measures - Adult Community Services)	£2,077,188	Suffolk County Council	<p>£17,593 on or before the first anniversary of the Commencement Date</p> <p>£17,593 on or before the 1 May following the second anniversary of the Commencement Date</p> <p>£342,544 on or before the 1 May following the third, fourth and fifth anniversaries of the Commencement Date</p> <p>£342,544 on or before the 1 May following the sixth anniversary of the Commencement Date</p> <p>£342,544 on or before the 1 May following the seventh anniversary of the Commencement Date</p> <p>£299,609 on or before the 1 May following the eighth anniversary of the Commencement Date</p> <p>£15,592 on or before the 1 May following the ninth</p>	

CONTRIBUTION	TOTAL	RECIPIENT(S)	PHASING	
			anniversary of the Commencement Date £9,658 on or before the 1 May following the tenth anniversary of the Commencement Date <b>£4,422</b> on or before the 1 May following the eleventh anniversary of the Commencement Date	
<i>Schedule 5, paragraph 2.4: Public Services Resilience Fund (Social Care Resilience Measures - Adult Community Services Contingency)</i>	£1,000,000	<i>Suffolk County Council</i>		<i>Up to £1,000,000 as and when notified by the Community Safety Working Group that there has been a material increase in the cost of commissioning home care services in parishes within 10 miles from the Main Development Site</i>
Schedule 5, paragraph 2.5: Public Services Resilience Fund (Social Care Resilience Measures- Children and Young People's Services)	£1,920,814	Suffolk County Council	£1,226 on or within 3 months of the Commencement Date £61,628 on or before the first anniversary of the Commencement Date £64,135 on or before the 1 May following the second anniversary of the Commencement Date	

CONTRIBUTION	TOTAL	RECIPIENT(S)	PHASING	
			<p>£302,781 on or before the 1 May following the third anniversary of the Commencement Date</p> <p>£305,886 on or before the 1 May following the fourth anniversary of the Commencement Date</p> <p>£307,469 on or before the 1 May following the fifth anniversary of the Commencement Date</p> <p>£309,236 on or before the 1 May following the sixth anniversary of the Commencement Date</p> <p>£306,772 on or before the 1 May following the seventh anniversary of the Commencement Date</p> <p>£157,743 on or before the 1 May following the eighth anniversary of the Commencement Date</p> <p>£54,567 on or before the 1 May following the ninth anniversary of the Commencement Date</p> <p>£33,845 on or before the 1 May following the tenth anniversary of the Commencement Date</p>	

CONTRIBUTION	TOTAL	RECIPIENT(S)	PHASING	
			£15,526 on or before the 1 May following the eleventh anniversary of the Commencement Date	
Schedule 5, paragraph 2.6: Public Services Resilience Fund (Social Care Workforce Resilience Planning Measures)	£100,000	Suffolk County Council	£100,000 within 3 months of the Commencement Date	
Schedule 5, paragraph 2.7: Public Services Resilience Fund (School and Early Years Resilience Measures)	£1,059,660	Suffolk County Council	<p>£61,305 within 3 months of the Commencement Date or on or before the 1 May following Commencement (if earlier)</p> <p>£61,305 annually on or before each 1 May following the first anniversary of the Commencement Date until the end of the Construction Period</p>	Up to a maximum of £29,454.55 per year and up to £324,000 overall as and when notified by the Community Safety Working Group that there is an additional demand for resources caused directly by the Project.
Schedule 5, paragraph 4: School and Early Years Capacity Contribution	£1,920,252	Suffolk County Council		Up to a maximum of £1,920,252 as approved by the Social Review Group in accordance with paragraph 4

CONTRIBUTION	TOTAL	RECIPIENT(S)	PHASING	
<i>Schedule 5, paragraph 5: School and Early Years Capacity Contingency Contribution</i>	£2,169,102	<i>Suffolk County Council</i>		<i>Up to £2,169,102 as and when approved by the Social Review Group</i>
Schedule 6, paragraph 3: Residual Healthcare Contribution	£1,112,618	Suffolk County Council	£200,000 on or before Commencement £200,000 on or before the second anniversary of the Commencement Date £270,000 on or before the fifth anniversary of the Commencement Date £310,000 on or before the seventh anniversary of the Commencement Date £132,618 on or before the ninth anniversary of the Commencement Date	
Schedule 6, paragraph 4: Health and Wellbeing Officer Contribution	£447,697	Suffolk County Council (for onward payment to the Ipswich and East Suffolk Clinical Commissioning Group (or successor body))	£113,461 on or before Commencement £170,191 on or before the second anniversary of the Commencement Date £113,461 on or before the fifth anniversary of the Commencement Date	

CONTRIBUTION	TOTAL	RECIPIENT(S)	PHASING	
			£50,584 on or before the seventh anniversary of the Commencement Date	
Schedule 6, paragraph 5: GP Contribution	£16,900	Suffolk County Council (for onward payment to the Ipswich and East Suffolk Clinical Commissioning Group (or successor body))	<p>£2,600 on or before Commencement</p> <p>£3,900 on or before the second anniversary of the Commencement Date</p> <p>£2,600 on or before the fifth anniversary of the Commencement Date</p> <p>£2,600 on or before the seventh anniversary of the Commencement Date</p> <p>£5,200 on or before the ninth anniversary of the Commencement Date</p>	
Schedule 7, paragraph 2.7: Asset Skills Enhancement and Capability Fund	£7,800,000	Suffolk County Council		In four instalments, each relating to a particular Construction Phase and each to be paid within 30 days of the date that the Employment, Skills and Education Working Group approves the first Annual Skills Implementation Plan relating to that Construction Phase
Schedule 7, paragraph 2.3: Regional Skills Co-ordination Function	£1,300,000	Suffolk County Council		In equal instalments or annual instalments proposed by Suffolk

CONTRIBUTION	TOTAL	RECIPIENT(\$)	PHASING	
				County Council and approved by the ESEWG
Schedule 7, paragraph 2.6: Sizewell C Bursary Scheme	£750,000	<i>n/a</i>		Annually in accordance with the relevant Annual Skills Implementation Plan
Schedule 7, paragraph 2.4: Sizewell C Employment Outreach Fund	£1,600,000	Suffolk County Council		During the Construction Period in equal annual instalments or such alternative annual instalments as are approved in the Annual Skills Implementation Plan
<i>Schedule 7, paragraph 2.5: Sizewell C Employment Outreach Contingency Fund</i>	<i>£400,000</i>	<i>Suffolk County Council</i>		<i>In the event that the ESEWG determines that the Number of Additional Sizewell C Employment Outreach Placements is greater than or equal to one</i>
Schedule 7. paragraphs 2.8 and 3.1.7: Asset Skills Enhancement and Capability Investments	£5,000.000	Suffolk County Council		In accordance with the Annual Skills Implementation Plans
Schedule 7, paragraph 5.1:	£1,820,000	East Suffolk Council	£140,000 on or before Commencement and annually thereafter on the	

<b>CONTRIBUTION</b>	<b>TOTAL</b>	<b>RECIPIENT(S)</b>	<b>PHASING</b>	
Economic Development			anniversary of the Commencement Date until the end of the Construction Period	
Schedule 7, paragraph 5.2: Economic Development Business Support Service	£2,340,000	East Suffolk Council	£180,000 on or before Commencement and annually thereafter on the anniversary of the Commencement Date until the end of the Construction Period	
Schedule 7, paragraph 5.3: Business Support Fund	£1,000,000	East Suffolk Council		Up to £1,000,000 as and when requested for onward payment to successful applicants
Schedule 8, paragraph 3.1: Leiston Abbey Site (First Site)	£100,000	East Suffolk Council (for onward payment to RSPB)	£80,000 on or before Commencement  £20,000 on or before the eighth anniversary of the Commencement Date	
Schedule 8, paragraph 3.2: Leiston Abbey Site (Second Site)	£1,240,224	East Suffolk Council (for onward payment to the Historic Buildings and Monuments Commission for England)	£654,134 on or before Commencement  £436,090 on or before the first anniversary of the Commencement Date  £90,000 on or before Commencement	

CONTRIBUTION	TOTAL	RECIPIENT(S)	PHASING	
			£60,000 on or before the first anniversary of the Commencement Date	
Schedule 8, paragraph 4: SEC Archaeological Monitoring Contribution	£288,750	Suffolk County Council		Within 30 days of the presentation of invoices
Schedule 10, paragraph 2: Leiston Sports Facilities	Up to £1,092,000	East Suffolk Council	£75,000 on or before Commencement	Up to £1,017,000 within 30 days of presentation of invoice confirming amount of remainder in accordance with paragraph 2.2.2
Schedule 10, paragraph 2.4: Annual Maintenance Payment	Up to £660,000	East Suffolk Council		Annually £55,000 from first use of Leiston Sports Facilities until the end of Construction Period
Schedule 11, paragraph 2.2: Natural Environment improvement Fund	£9,703,300	Suffolk County Council (for onward payment to the successful bidders)		As and when requested and approved by the Natural Environment Awards Panel
Schedule 11, paragraph 3.1: Land Management and Skills Scheme	£425,000	East Suffolk Council	£25,000 on or before Commencement and £25,000 annually thereafter for the duration of the Construction Period and the following five years	

CONTRIBUTION	TOTAL	RECIPIENT(S)	PHASING	
Schedule 11, paragraphs 4: Project Officers	£1,871,700	Suffolk County Council (for onward payment to SCHAONB)	£57,000 on or before Commencement and annually thereafter until the end of the Construction Period and the following three years  £67,780 on or before Commencement and annually on the anniversary of the Commencement Date until the end of the Construction Period and the following three years	
<i>Schedule 11, paragraph 6: European Sites Access Contingency Fund</i>	<i>£2,000,000</i>	<i>East Suffolk Council (for onward payment to RSPB, National Trust, Natural England, Forestry England or Suffolk Wildlife Trust)</i>		<i>Up to £2,000,000 subject to approval by the Environment Review Group</i>
Schedule 11, paragraph 7: Recreational Disturbance Avoidance Mitigation Contribution	£150,000	East Suffolk Council		On or before first occupation of the Accommodation Campus or the LEEIE Caravan Park, whichever occurs earlier
<i>Schedule 11, paragraph 8: Fen Meadow Contingency Fund</i>	<i>£3,000,000</i>	<i>East Suffolk Council</i>		<i>On the eleventh anniversary of Commencement of Work No. 1A in Schedule 1 to the Development Consent Order, unless the Ecology Working Group determines that the Fen</i>

<b>CONTRIBUTION</b>	<b>TOTAL</b>	<b>RECIPIENT(S)</b>	<b>PHASING</b>	
				<i>Meadow Target Quantum has been met</i>
Schedule 11, paragraph 9: Eel and Fish Monitoring and Migration	£500,000	Environment Agency		On or before Commencement of Work No. 2A-2F (cooling water infrastructure)
<i>Schedule 11, paragraph 9: Fish Contingency Fund</i>	<i>£750,000</i>	<i>Environment Agency</i>		<i>Subject to approval by the Marine Technical Forum</i>
Schedule 11, paragraph 12 Farmland Bird Mitigation Fund	£300,000	East Suffolk Council for onward payment to landowners	£100,000 on or before Commencement, and annually on or before the first two anniversaries of the Commencement Date	
Schedule 13, paragraph 2.1: National Trust Dunwich Heath and Coastguard Cottages Resilience Fund	£851,365	East Suffolk Council (for onward payment to the National Trust)	£595,955.50 on or before Commencement £255,409.50 on or before the sixth anniversary of the Commencement Date	
Schedule 13, paragraph 2.2: Pro Corda Resilience Fund	£500,000	East Suffolk Council (for onward payment to the Pro Corda)	£364,000 on or before Commencement £136,000 on or before the third anniversary of the Commencement Date	
Schedule 13, paragraph 2.3: RSPB Resilience Fund	£2,520,000	East Suffolk Council (for onward payment to RSPB)	£2,142,000 on or before Commencement	

CONTRIBUTION	TOTAL	RECIPIENT(\$)	PHASING	
			£378,000 on or before the sixth anniversary of the Commencement Date	
Schedule 14, paragraph 2: Sizewell C Community Fund	£23,000,000	Paid to and applied by the Suffolk Community Foundation (or an alternative trust)	£2,000,000 on or before Commencement £1,900,000 annually on each anniversary of the Commencement Date occurring during the Construction Period	
Schedule 15, paragraph 2: Tourism Support Resources	£3,000,000	East Suffolk Council	£200,000 on or before Commencement and thereafter annually on or before the first to fourteenth anniversaries of the Commencement Date	
Schedule 15, paragraph 3: Tourism Fund	£9,000,006	East Suffolk Council	£1,000,000 on or before Commencement £571,429 annually on each anniversary of the Commencement Date on or before the first to fourteenth anniversaries of the Commencement Date	
<i>Schedule 16, paragraphs 4.6 and 4.7:</i>	<i>£1,645,000</i>	<i>Suffolk County Council</i>		<i>Up to £1,645,000 as and when requested by the Transport</i>

<b>CONTRIBUTION</b>	<b>TOTAL</b>	<b>RECIPIENT(S)</b>	<b>PHASING</b>	
<i>Contingent Effects Fund</i>				<i>Review Group in accordance with paragraphs 4.6 and 4.7</i>
Schedule 16, paragraph 5.1.3: PROW Fund	£2,500,000	Suffolk County Council	£2,500,000 on or before Commencement	
<i>Schedule 16, paragraph 7.2: Highway Structural Maintenance Contribution</i>	<i>£585,133</i>	<i>Suffolk County Council</i>		<i>In the event that the results of any deflectograph condition survey demonstrate that the Maintenance Area requires maintenance works to mitigate the impact of Sizewell C construction traffic.</i>
Schedule 16, paragraph 8.1: A12 Contribution	£2,336,820	Suffolk County Council	£2,336,820 on or before Commencement	
Schedule 16, paragraph 9.1: Leiston Cycling and Walking Contribution	£728,185	Suffolk County Council	£468,185, on or before Commencement	£260,000, within 30 days of receipt from Suffolk County Council during the Construction Period of evidence to the satisfaction of SZC Co (acting reasonably) that the Leiston Route 3 Scheme is deliverable
Schedule 16, paragraph 13: ALL Contributions	£10,000,000	Suffolk County Council for onward payment to Suffolk Constabulary	£1,643,226 on or before Commencement  £1,643,226 on or before each anniversary of the Commencement Date until such time as both the Sizewell Link Road and the Two Villages Bypass are open to the public.	

CONTRIBUTION	TOTAL	RECIPIENT(S)	PHASING
Schedule 16, paragraph 14: Highway Technical Approval and Inspection fees	% of the Bond Value	Suffolk County Council	In accordance with the instalments set out in paragraph 14

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**TOTALS (EXCLUDING HIGHWAY TECHNICAL APPROVAL AND INSPECTION FEES)**

Including contingency            £158,666,238

Excluding contingency            £146,271,721

#### 4. S106 Contributions received in 2022-23

4.1 Table 3 shows the total amount of money under any planning obligation which was received by East Suffolk Council during 2022-23;

**Table 3**

<b>Contribution Type</b>	<b>Amount</b>
East Suffolk RAMS (Habitat Mitigation)	£235,513.88
Landguard (Felixstowe Port S106)	£25,000.00
Play equipment	£29,691.77
Community facilities	£28,525.08
Footpaths and Cycleways	£21,672.57
Rail Improvement Works	£39,223.99
Health	£16,500.00
<b>Total</b>	<b>£396,127.29</b>

#### 5. S106 allocations and expenditure

5.1 The total amount of money under any planning obligations which was received prior to 2022-23 that has not been allocated by the end of the reported year is **£3,733,090.90**.

5.2 The total amount of money under any planning obligations which was allocated but not spent during 2022-23 is £565,887.66.

5.3 The total amount of money under any planning obligations which was spent during 2022-23 (including transferring it to another person, such as a Town or Parish Council to spend) is £1,011,749.24.

5.4 Table 4a shows s106 spend broken down and cross referenced to the planning reference source of funds. Where multiple small amounts have historically been pooled under the Open Space and Sport Policies, the planning application references have not been provided.

**Table 4a**

<b>Spend Type</b>	<b>Project</b>	<b>Amount</b>	<b>Reference</b>
Affordable Housing	Deben Fields (former Deben High School) – part funding towards 42 affordable rent and shared ownership homes	£402,908.42	DC/15/0151 C13/1012
	Orwell Parham Scheme - delivery of 6 affordable rented homes, plots 10-15 DC/18/2212/FUL	£60,000.00	DC/15/1949
Former Suffolk	Purdis Farm - Murrills Park play area, trim trail, nature trail, outdoor gym	£69,589.25	Multiple

<b>Spend Type</b>	<b>Project</b>	<b>Amount</b>	<b>Reference</b>
Coastal Play and Sport	Melton - sports ground enhancements at Hall Farm Road	£6,395.00	Multiple
	Felixstowe - floodlight improvements at Coronation Sports Ground	£30,000.00	Multiple
	Tuddenham St Martin - Play area improvements Keightley Way	£4,283.71	Multiple
	Grundisburgh - new play equipment at playing field	£4,817.57	Multiple
	Nacton - trim trail and outdoor gym	£10,407.14	Multiple
	Waldringfield - play area improvements, playing field	£6,500.00	Multiple
	Felixstowe - purchase defib for Cricket Club at Deben School	£1,170.00	Multiple
	Martlesham - Jubilee play area upgrade and MUGA	£47,810.30	Multiple
	Purdis Farm - accessible roundabout	£16,127.11	Multiple
	Bawdsey - Tennis Court refurb	£6,030.00	Multiple
	Bawdsey - seating at recreation ground	£1,329.09	Multiple
	Hollesley - play equipment and refurb	£36,149.16	Multiple
	Kirton - Safety Surfacing at Recreation Ground	£4,864.00	Multiple
	Yoxford - Basketball Posts at Yoxford Village Hall	£2,950.00	Multiple
	Leiston - Prep works for skatepark extension	£1,375.00	Multiple
Woods Meadow Country Park	Country park enhancements	£15,700.48	DC/01/0977/OUT
RAMS	Project and staffing costs	£106,781.00	Multiple
Other spend	Landguard (Felixstowe Port) – Staffing Costs	£ 91,788.44	C03/2000
Commuted Sums – Open Space maintenance	Maintenance of multiple open space sites adopted by the Council	£84,773.57	Multiple
<b>Total</b>			<b>£1,011,749.24</b>

- 5.5 S106 monitoring fees of £17,811.80 have been received in respect of monitoring in relation to the delivery of planning obligations during 2022-23. These are used towards service costs within the same year of receipt.
- 5.6 The Infrastructure Team have reviews s106 monitoring fees for East Suffolk annually to ensure the income is sufficient to support delivery of timely and effective monitoring arrangements for s106, together with the provision of online, real time and transparent data to assist stakeholders to view collection and spend of developer contributions.

5.7 Table 4b shows 106 allocations broken down and cross referenced to the planning reference source of funds.

**Table 4b**

<b>Proposed Spend Type</b>	<b>Project</b>	<b>Amount £</b>	<b>Reference</b>
<b>Allocated but not spent during 2022-23</b>			
Affordable Housing	Deben Fields (former Deben High School) – part funding towards 42 affordable rent and shared ownership homes	£138,038.28	C/12/2072
	Milton Road – part funding towards 6 affordable rent homes	£152,911.73	Multiple
	Meadow Gardens – part funding towards a M4(3) compliant bungalow	£167,963.25	Multiple
Community Facilities	Provision of Community Facilities at Woods Meadow (awaiting further funds before project progressed)	£28,525.08	DC/01/0977/OUT
Play Equipment	Provision of play areas x 2 at Woods Meadow	£29,691.77	DC/01/0977/OUT
Former Suffolk Coastal Play and Sport	Blythburgh - New play equipment	£12,140.59	Multiple
	Felixstowe - Remedial works on Felixstowe School for Felixstowe Cricket Club	£12,500.00	Multiple
	Dallinghoo - Football Pitch	£705.20	Multiple
	Tuddenham St Martin - Play area improvements	£8,567.42	Multiple
	Kettleburgh - installation of slide	£2,161.86	Multiple
Other	Landguard (Felixstowe Port) - management costs	£12,682.48	DC/03/2000
<b>Total</b>		<b>£565,887.66</b>	
<b>Allocated prior to 2022-23 but not spent by the end of the reported year</b>			
Affordable Housing	Deben Fields (former Deben High School) – part funding towards 42 affordable rent and shared ownership homes	£15,000.00	C/07/1427
Former Waveney Open Space	Lowestoft Active Seafront Project	£9,374.62	Multiple
Playing Fields	Playing Field due to be provided at Brooke Peninsula site (dependent upon development of site)	£1,157.97	DC/16/0892/FUL

Proposed Spend Type	Project	Amount £	Reference
Country Park	Laying out of Woods Meadow Country Park	£138,340.77	DC/01/0977/OUT
Play Equipment	Provision of play areas x 2 at Woods Meadow	£216,161.61	DC/01/0977/OUT
Community Facilities	Provision of Community Facilities at Woods Meadow (awaiting further funds before project progressed)	£197,536.73	DC/01/0977/OUT
Former Suffolk Coastal Play and Sport	Woodbridge Improvements to Woodbridge Skatepark	£15,000.00	Multiple
	Reinstatement of recreation ground, Heveningham	£4,754.81	
	Pocket Park Play Area, Badingham	£691.67	
	Multi Use Games Area, Benhall	£4,835.74	
Other	Air Quality	£7,662.97	Felixstowe South Reconfiguration
Commuted Sums – Open Space maintenance	Maintenance of multiple open space sites adopted by the Council	£380,273.33	Multiple
<b>Total</b>		<b>£ 990,790.22</b>	

## 6. 2022-23 closing S106 balances

6.1 Table 5 shows the total amount of money (received under any planning obligations) that have been retained at the end of the 2022-23 financial year. In total this is **£5,631,806.92**.

**Table 5**

Contribution Type	Amount
East Suffolk RAMS (Habitat Mitigation)	£942,933.11*
Affordable Housing	<b>£2,206,064.26</b>
Air Quality (Felixstowe South Reconfiguration)	£7,662.97
Landguard (Felixstowe Port S106)	£12,682.48
Playing Fields	£1,157.97
Former Waveney Open Space	<b>£67,649.71</b>
Woods Meadow Country Park	£138,340.77
Play equipment	£245,853.38
Refuse	£21,394.83
Community facilities	£401,309.16
Former Suffolk Coastal Play space	<b>£404,269.94**</b>
Former Suffolk Coastal Sport	<b>£711,923.75**</b>
Footpaths and Cycleways	£34,567.27

Rail Improvements	£39,223.99
Health	£16,500.00
Commuted sums for Maintenance	£380,273.33
<b>Total</b>	<b>£5,631,806.92</b>

\* East Suffolk RAMS includes upfront payments, which are not available to spend until the development has commenced. The total available for spend at this stage is £553,642.49.

\*\* Interest is applied annually to these figures, with accrued interest during 2022-23 totalling £29,127.70.

# Appendix C - The Infrastructure List

## 1. Review of infrastructure needs

- 1.1 The Infrastructure List has been developed through the ongoing review of infrastructure needs originally identified through the development of the Waveney and Suffolk Coastal Local Plans. Each Local Plan includes an Infrastructure Delivery Framework, reflecting assessed infrastructure requirements at the time of the development of the Local Plans.
- 1.2 The Infrastructure List is subject to annual review to ensure that costings of projects are accurately reflected, funding streams are updated, priorities and timings for delivery are accurate and to add or remove projects that arise through consultations and the planning process. Discussions have taken place with the statutory bodies providing services such as Police, Health, Educations, and Highways in order to review their infrastructure requirements and to add or remove projects, for example, as population trends change, and service delivery methods change. This ensures that the Infrastructure List contains the most up to date information for all stakeholders.
- 1.3 The East Suffolk Cycling and Walking Strategy, adopted in October 2022, identifies several potential cycling and walking infrastructure recommendations throughout the council area. In addition, the Strategy attempts to provide a cost estimate for many of these recommendations. These costs can be used as an evidence base for future cycling and walking infrastructure projects that are included in the Infrastructure List.
- 1.4 A list of further details of the infrastructure projects that have been either partially or fully funded with District CIL is included at the beginning of the Infrastructure Funding Statement.

## 2. The generic infrastructure list

- 2.1 Where major **unplanned sites** (those over 10 dwellings) are considered, the following generic infrastructure list is used as the basic approach to considering how required infrastructure should be funded. The list does not prevent s106 being used where there are very specific on or off-site infrastructure requirements or preclude East Suffolk from using CIL to enable delivery of infrastructure partly funded through s106.
- 2.2 Table 1 is to be used as a guide to the approach to collecting contributions from unplanned sites.
- 2.3 For planned sites (i.e., sites allocated in one of the two Local Plans), the infrastructure funding will typically follow that set out in Table 1 below, but the particular policy and supporting text wording should be referred to, as there are some cases where particular pieces of infrastructure are envisaged to be funded differently. The approach taken with “Strategic” sites is covered in paragraphs 2.4 and 2.5 below.

**Table 1: Funding of infrastructure on unplanned sites**

Infrastructure Required	S106/s278	CIL
Highway improvements including strategic cycling and pedestrian infrastructure	X	
Strategic highway improvements including strategic cycling and pedestrian infrastructure		X
Library Facilities		X
Education – additional pre-school places at existing establishments		X
Education – additional primary school places at existing establishments		X
Education – additional secondary school and sixth form places at existing establishments		X
Education – NEW Schools or early years settings	X	
Off-site Health Infrastructure		X
Care Facilities	X	
Off-site Police Infrastructure		X
Off-site Leisure and Community Facilities		X
Open Space	X	
Maintenance of Open Space where transferred to East Suffolk	X	
Strategic Green Infrastructure		X
Strategic Flooding and coastal defence works		X
Strategic Waste Infrastructure		X
School Transport Contributions	X	

- 2.4 The East Suffolk CIL Charging Schedule was adopted in June 2023. Eight sites identified in either the Waveney Local Plan (2019) or Suffolk Coastal Local Plan (2020) are identified as being “strategic” by virtue of their scale. These sites have bespoke residential CIL rates and the balance of residential S106/S278, and CIL infrastructure funding is set out below in Table 2 (other infrastructure types, such as retail or employment, will be charged as per the East Suffolk CIL Charging Schedule).
- 2.5 Table 2 shows how developer contributions will be sought in relation to the identified strategic sites.

**Table 2: Funding of infrastructure on “strategic” sites**

Site	Residential CIL rate	CIL-funded infrastructure	S106/S278-funded infrastructure	Notes
Brightwell Lakes (Adastral Park) (SCLP12.19)	£0	None	Everything required	This site was granted outline planning permission in 2018 at a zero rate of CIL (as per the Suffolk Coastal Charging Schedule)
Kirkley Waterfront and Sustainable Urban Neighbourhood (WLP2.4)	£0	None	Everything required	
South Saxmundham Garden Neighbourhood (SCLP12.29)	£100	<ul style="list-style-type: none"> <li>Libraries contributions</li> </ul>	Everything else required	
North Felixstowe Garden Neighbourhood (SCLP12.3)	£65	<ul style="list-style-type: none"> <li>Libraries contributions</li> <li>HWRC (Household Waste Recycling Centres) improvements</li> <li>Secondary school places</li> </ul>	Everything else required	
Land off Howlett Way Trimley St Martin (SCLP12.64)	£160	<ul style="list-style-type: none"> <li>Libraries contributions</li> <li>HWRC improvements</li> <li>Secondary school places</li> <li>Health contributions</li> </ul>	Everything else required	
Land south of The Street, Carlton Colville/Gisleham (WLP2.16)	£90	<ul style="list-style-type: none"> <li>Libraries contributions</li> <li>HWRC improvements</li> <li>Secondary school places</li> <li>Health contributions</li> </ul>	Everything else required	
Beccles & Worlingham Garden Neighbourhood (WLP3.1)	£0	<ul style="list-style-type: none"> <li>Libraries contributions</li> <li>Secondary school places</li> <li>Health contributions</li> </ul>	Everything required	
North of Lowestoft Garden Village (WLP2.13)	£60	<ul style="list-style-type: none"> <li>Libraries contributions</li> <li>HWRC improvements</li> <li>Secondary school places</li> <li>Health contributions</li> </ul>	Everything else required	

### 3. The Infrastructure List 2022-23

- 3.1 The Infrastructure List is broken down into type, for example it starts with listing all Highways projects and ends with Coastal Protection and Flooding, followed by the keys to colour coding within the Infrastructure List. The keys are located at the end of the Infrastructure List.
- 3.2 The Infrastructure List is subject to annual review to ensure it accurately reflects delivery of the infrastructure projects. As Neighbourhood Plans are 'made' the infrastructure needs identified from this growth are also added to this list.
- 3.3 A simple 'traffic light' colour coding is applied within the status column, so that it's easy to identify which projects are completed, underway or are awaiting delivery. For ease of viewing, all projects within each section are ordered by the red, amber, green status. Red means that the project has not yet started, amber means the project is in progress and green means the project has completed.
- 3.4 A blue status colour indicates a project which was allocated CIL Funding which is no longer proceeding or a previously planned project that is no longer required to be delivered.

## Highways

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Potential Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/ Progress	Status	Comments
Trimley St Mary - pedestrian crossing		Trimley St Mary	Desirable	Trimley St Mary Parish Council	£65,000	Trimley St Mary Parish Council	£20,000.00	£45,000.00	CIL	£0.00	None	Short term		DCIL funding 2018/19
Rushmere St Andrew, Playford Road Traffic Calming		Rushmere St Andrew	Desirable	Rushmere St Andrew Parish Council, Suffolk County Council	£61,050	Rushmere St Andrew Parish Council	£15,850.00	£45,200.00	CIL	£0.00	None	Short term		DCIL funding 2018/19
Traffic calming measures		Easton	Essential	Parish Council, Suffolk County Council	Unknown	Unknown	Unknown	Unknown	Neighbourhood CIL	Unknown	Unknown	Short – Medium term		A Neighbourhood CIL project which SCC is working on with Easton Parish Council to deliver traffic calming measures. Project completed
Halesworth - Footpath Hill Farm Road		Halesworth	Desirable	Suffolk County Council	£25,474	None	£0.00	£25,474.00	CIL	£0.00	None	Short term		DCIL Funding 2018/19. The total cost of the PRoW footpath was revised to £25,474 in March 2022 (the original scheme was estimated at £56,002.50, with DCIL bid approved in Oct 2018). SCC considering any other improvements that could be delivered with remaining CIL. The project provides an improvement to the existing network with better connectivity to the town centre, to Holton Saint Peter Community Primary School, and to the sports ground and the playing field. Completed September 2022
Footway improvements at Land to the East of Aldeburgh Road, Aldringham	SCLP12.42	Aldringham Cum Thorpe	Essential	Developer	£10,000	None	Unknown	£10,000.00	Section 278	£0.00	N/A	Short – Medium term (with development of site)		
Dedicated access for cyclists and pedestrians at Woods Lane and Wilford Bridge Road, Melton	MEL2	Melton	Essential	Parish Council, Suffolk County Council	£1,700,000.00	None	Unknown	Unknown	Neighbourhood CIL	None	None	Short Term		Part of Melton Neighbourhood Plan. Crossing improvements at the T junction of Bredfield Road and Woods Lane
Framlingham - Walkway Routes and Pembroke Road junction improvements		Framlingham	Desirable	Framlingham Town Council	£107,000	Framlingham Town Council, S106	£52,000.00	£55,000.00	CIL	£0.00	None	Short term		DCIL funding 2018/19. Road Safety Audit was carried out during spring 2022 for Pembroke Road junction, design includes better safety measures with narrowing of the road for vehicular access. The zebra crossing on Station Road, adjacent to the Hopkins Homes site (known as Prospect Place) was delivered in November 2018. Work on Pembroke Road completed February 2023
Normanston Park Pedestrian and Cycle Bridge, Lowestoft		Lowestoft	Essential	East Suffolk Council	£1,200,000	None	£0.00	£1,200,000.00	CIL	£0.00	Suffolk County Council, East Suffolk Council, grant funding from organisations such as Sustrans (awarded quarterly)	Short term		At Feasibility Stage. £120,000 DCIL allocated 2017/18 and completed, £19,992 unspent. Pedestrian and cycle bridge over railway, planning application (submitted by East Suffolk Council) permitted in November 2019, Ref: DC/19/2796/RG3. The Normanston Park Railway bridge is part of the overall strategy for Lake Lothing. ESC is leading on this project and would need to commission a preliminary design to update the construction costs.

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Potential Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/ Progress	Status	Comments
The Gull Wing Bridge over Lake Lothing, Lowestoft		Lowestoft	Essential	Suffolk County Council, East Suffolk Council	£150,000,000.00	Central Government has confirmed funding for £73 million. Suffolk County Council is required to underwrite the remainder in advance of other local sources being identified.	£150,000,000.00	£0.00	None	£0.00	New Anglia LEP, Highways England	Short term		Construction began April 2021 and progressing. Opening anticipated for 2023
Brooke Peninsula Pedestrian and Cycle Bridge, Lowestoft	WLP2.4	Lowestoft	Essential	Suffolk County Council, East Suffolk Council	£40,000,000.00	Section 106 from permitted development on Kirkley Waterfront and Sustainable Urban Neighbourhood site	Unknown	£1,897,432.00	Section 106	£38,102,568.00	N/A	Short term		The Gull Wing bridge (referred above) will provide pedestrian and cycle access over Lake Lothing. Further work, including commissioning, would be needed to update the cost estimate of providing a Pedestrian and Cycle Bridge at the Brooke Peninsula and whether it is necessary
Access, cycle and footway improvements for North Felixstowe Garden Neighbourhood	SCLP12.3	Various	Critical	Developer	Unknown	None	Unknown	Unknown	Section 278/Section 106	£0.00	N/A	Short – Medium term (with development of site)		Bus, Public Rights of Way and TRO improvements secured through Section 106
Dedicated footpaths and cycle paths between Former Ashley Nurseries Site and Land at Laurel Farm East, West and South	SA1, SA2, SA3	Kessingland	Essential	Developer	Unknown	Unknown	Unknown	Unknown	Section 106, Neighbourhood CIL	Unknown	Unknown	Over Entire Plan Period		Part of Kessingland Neighbourhood Plan. Public Rights of Way and Mova Traffic System secured through Section 106
Footway improvements at Land north of Mill Close, Orford	SCLP12.57	Orford	Essential	Developer	£5,000 - £10,000	None	Unknown	£5,000 - £10,000	Section 278	£0.00	N/A	Short – Medium term (with development of site)		
Pedestrian crossings at Melton Road, Melton		Melton	Essential	Parish Council, Suffolk County Council	£60,000.00	None	Unknown	£60,000.00	CIL, Neighbourhood CIL	Unknown	Unknown	Short Term		Included in Melton Neighbourhood Plan. Currently being built with anticipated delivery in Summer 2022
Improved Access to Leiston household Waste Recycling Centre	TM5	Leiston	Desirable	Parish Council, Suffolk County Council	Unknown	None	Unknown	Unknown	Neighbourhood CIL	Unknown	Unknown	Short Term		Part of Leiston Neighbourhood Plan
Extending Speed Limits in Leiston		Leiston	Desirable	Parish Council, Suffolk County Council	Unknown	None	Unknown	Unknown	Neighbourhood CIL, Section 106	Unknown	Unknown	Short Term		Included in Leiston Neighbourhood Plan
Provision of cycling, walking and disability access routes	MAR13	Martlesham	Desirable	Parish Council, Suffolk County Council	Unknown	None	Unknown	Unknown	Neighbourhood CIL	Unknown	Unknown	Short Term		Part of Martlesham Neighbourhood Plan
Improvements to Bus Shelters and information in Melton	MEL4	Melton	Desirable	Parish Council, Suffolk County Council	Unknown	None	Unknown	Unknown	Neighbourhood CIL	Unknown	Unknown	Short Term		Part of Melton Neighbourhood Plan
Bicycle racks at Melton Railway Station	MEL5	Melton	Desirable	Parish Council, Suffolk County Council	Unknown	None	Unknown	Unknown	Neighbourhood CIL	Unknown	Unknown	Short Term		Part of Melton Neighbourhood Plan

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Potential Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/ Progress	Status	Comments
Car Park and landscaping at Land Opposite McColls Convenience Store, The Street, Melton	MEL7	Melton	Desirable	Parish Council, Suffolk County Council	Unknown	None	Unknown	Unknown	Neighbourhood CIL	Unknown	Unknown	Short Term		Part of Melton Neighbourhood Plan
Access from Boulge Road	BDP.9	Bredfield	Essential	Developer, Suffolk County Council	Unknown	None	Unknown	Unknown	Section 106, Neighbourhood CIL	Unknown	Unknown	Short Term		Part of Bredfield Neighbourhood Plan
Footpath link from site 534 to village centre	BDP.14	Bredfield	Essential	Developer, Suffolk County Council	Unknown	None	Unknown	Unknown	Section 106, Neighbourhood CIL	Unknown	Unknown	Short Term		Part of Bredfield Neighbourhood Plan.
Provision of new or extended Public Rights of Way		Reydon	Desirable	Parish Council, Suffolk County Council	Unknown	None	Unknown	Unknown	Neighbourhood CIL	Unknown	Unknown	Short Term		Included of Reydon Neighbourhood Plan
Provision of safe walking and cycling routes		Reydon	Desirable	Parish Council, Suffolk County Council	Unknown	None	Unknown	Unknown	Neighbourhood CIL	Unknown	Unknown	Short Term		Included of Reydon Neighbourhood Plan
Improvements to Hungate Car Park, including resurfacing, upgrading toilets and soft landscaping		Beccles	Desirable	Parish Council, Suffolk County Council	Unknown	None	Unknown	Unknown	Neighbourhood CIL	Unknown	Unknown	Short Term		Included of Reydon Neighbourhood Plan
Vehicular access from St John Road to Land to the east of St Margaret's Road, linked to access from WLP5.2	H4	Bungay	Essential	Parish Council, Suffolk County Council	Unknown	None	Unknown	Unknown	Neighbourhood CIL	Unknown	Unknown	Short Term		Included in Bungay Neighbourhood Plan
Pedestrian and Cycle Route through Land to the east of St Margaret's Road	H4	Bungay	Essential	Parish Council, Suffolk County Council	Unknown	None	Unknown	Unknown	Neighbourhood CIL	Unknown	Unknown	Short Term		Included in Bungay Neighbourhood Plan
Betts Avenue Public Right of Way improvements	SCLP12.19	Martlesham	Essential	Suffolk County Council	£15,200	None	£0.00	£15,200.00	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Felixstowe Road public right of way improvements	SCLP12.19	Martlesham	Essential	Suffolk County Council	£16,942	None	£0.00	£16,942.00	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Public Rights of Way stopping up contributions	SCLP12.19	Martlesham	Essential	Suffolk County Council	£8,000	None	£0.00	£8,000.00	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Public Rights of Way Order Making	SCLP12.19	Martlesham	Essential	Suffolk County Council	£19,500	None	£0.00	£19,500.00	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Brightwell Bridleway Scheme	SCLP12.19	Martlesham	Essential	Suffolk County Council	£19,000	None	£0.00	£19,000.00	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Public Rights of Way Signage	SCLP12.19	Martlesham	Essential	Suffolk County Council	£15,000	None	£0.00	£15,000.00	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Bridleway BR6 Improvement Scheme (Condition 69)	SCLP12.19	Martlesham	Essential	Suffolk County Council	Unknown	None	£0.00	Unknown	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Potential Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/ Progress	Status	Comments
General Public Rights of Way Improvements (Condition 10)	SCLP12.19	Martlesham	Essential	Suffolk County Council	Unknown	None	£0.00	Unknown	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Anson Road Improvements	SCLP12.19	Martlesham	Essential	Suffolk County Council	£60,000	None	£0.00	£60,000.00	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Arundel Way Improvements	SCLP12.19	Rushmere St Andrew	Essential	Suffolk County Council	£100,000	None	£0.00	£100,000.00	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Bell Lane Improvements	SCLP12.19	Kesgrave	Essential	Suffolk County Council	£100,000	None	£0.00	£100,000.00	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Dobbs Lane Improvements	SCLP12.19	Kesgrave	Essential	Suffolk County Council	£100,000	None	£0.00	£100,000.00	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Bus Infrastructure Improvements	SCLP12.19	Various	Essential	Suffolk County Council	£34,000	None	£0.00	£34,000.00	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Offsite Highways Mitigation Measures	SCLP12.19	Various	Essential	Suffolk County Council	£200,000	None	£0.00	£200,000.00	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes. Including £20,000 for survey work.
Speed Management Contributions	SCLP12.19	Various	Essential	Suffolk County Council	£200,247	None	£0.00	£200,247.00	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes. Including £32,040 for operating costs.
Highways Contributions	SCLP12.19	Various	Essential	Suffolk County Council	£399,998	None	£0.00	£399,998.00	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Speed Limit Signs (Condition 32)	SCLP12.19	Various	Essential	Suffolk County Council	Unknown	None	£0.00	Unknown	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Improvements to A14 Junction 58 (Condition 33)	SCLP12.19	Nacton	Essential	Suffolk County Council	Unknown	None	£0.00	Unknown	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Cycle and Footway Connection at Barrack Square (Condition 34)	SCLP12.19	Martlesham	Essential	Suffolk County Council	Unknown	None	£0.00	Unknown	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Improvements to A12 Barrack Square/Eagle Way Junction and Barrack Square/Gloster Road Junction (Condition 37)	SCLP12.19	Martlesham	Essential	Suffolk County Council	Unknown	None	£0.00	Unknown	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Improvements to Foxhall Road/Newbourne Road Junction (Condition 38)	SCLP12.19	Brightwell	Essential	Suffolk County Council	Unknown	None	£0.00	Unknown	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Potential Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/ Progress	Status	Comments
Improvements to Martlesham Roundabout (Condition 39)	SCLP12.19	Martlesham	Essential	Suffolk County Council	Unknown	None	£0.00	Unknown	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Improvements to Goster Road/Felixstowe Road Junction (Condition 40)	SCLP12.19	Nacton	Essential	Suffolk County Council	Unknown	None	£0.00	Unknown	Section 106	£0.00	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Cycle link along Ellough Road, Beccles	WLP3.1	Worlingham	Essential	Suffolk County Council	£112,100	None	£0.00	£112,100.00	Section 278	£0.00	N/A	Medium Term		Linked to Waveney Cycle Strategy projects BE20 and BE21
Cycle link between Lowestoft and Hopton	WLP2.13	Various	Essential	Suffolk County Council	£380,000	None	£0.00	£380,000.00	Section 278	£0.00	N/A	Medium Term		CIL used as 'top up' if needed, Linked to Waveney Cycle Strategy projects R3, R4, R5 and R6
Improvements to Bloodmoor Roundabout, Carlton Colville, Lowestoft	WLP2.16	Carlton Colville	Essential	Suffolk County Council	£700,000 - £1,000,000	None	Unknown	£700,000 - £1,000,000	Section 106 – principally from WLP2.16 but also other sites in vicinity of Lowestoft	£0.00	N/A	Medium term		
Potential safety Improvements to A47 to accommodate the North Lowestoft Garden Village	WLP2.12	Corton	Potentially Critical	Highways England, Suffolk County Council	Unknown	Unknown	Unknown	Unknown	Section 278	Unknown	N/A	Long term		
Continuation of Shared Space Scheme at Felixstowe Town Centre		Felixstowe	Desirable	Felixstowe Town Council, East Suffolk Council, Suffolk County Council	Unknown	Felixstowe Town Council, East Suffolk Council, Suffolk County Council	Unknown	Unknown	Section 106/Section 278	£0.00	N/A	Over entire plan period		CIL used as 'top up' if needed
Measures to improve capacity at Garrison Lane / High Road junction, Felixstowe		Felixstowe	Essential	Suffolk County Council	£250,000 - £300,000	None	Unknown	£250,000 - £300,000	Section 106/Section 278	£0.00	N/A	Over entire plan period		The route is identified as a priority in Suffolk's LCWIP and East Suffolk's Active Travel Strategy
Measures to improve capacity at Garrison Lane / Mill Lane junction, Felixstowe		Felixstowe	Essential	Suffolk County Council	£250,000 - £300,000	None	Unknown	£250,000 - £300,000	Section 106/Section 278	£0.00	N/A	Over entire plan period		The route is identified as a priority in Suffolk's LCWIP and East Suffolk's Active Travel Strategy
Improvements to A14, junction 55 (Copdock Interchange, Ipswich)		Ipswich	Essential	Suffolk County Council, Highways England	£65,000,000 - £100,000,000	Highways England, Central Government	£9,750,000 - £15,000,000	Unknown	CIL	Unknown	Highways England, Central Government, other ISPA authorities	Over entire plan period. Local (Suffolk Coastal) contribution derived from traffic modelling of proportion of trips derived from Suffolk Coastal Local Plan growth.		

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Potential Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/ Progress	Status	Comments
Improvements to A14, junction 56 (Wherstead)		Ipswich	Essential	Suffolk County Council, Highways England	TBC	Highways England, Central Government	Unknown	Contribution unknown – potential contribution from development proposal in Babergh District to be funded via s278	Section 278/CIL	Unknown	Developer contributions from ISPA authorities, Highways England (Road Investment Strategy or Minor Works Fund), Central Government	Over entire plan period		
Improvements to A14, junction 57 (Nacton)		Nacton	Essential	Suffolk County Council, Highways England	£5,000,000 - £10,000,000	Highways England, Central Government, DfT Minor Works Fund	£1,075,000 - £2,150,000	Unknown	CIL	Unknown	Highways England, Central Government	Over entire plan period. Local (Suffolk Coastal) contribution derived from traffic modelling of proportion of trips derived from Suffolk Coastal Local Plan.		
Improvements to A14, junction 58 (Seven Hills)		Various	Essential	Suffolk County Council, Highways England	£5,000,000	Highways England, Central Government	Unknown (if under s278)	£5,000,000.00	Section 106,/Section 278/CIL	Unknown	Highways England, Central Government, other ISPA authorities	Over entire plan period - Contributions expected from sites SCLP12.19 and SCLP12.20.		
Sustainable transport measures in Ipswich, including Behaviour Change Measures and projects within the Enhanced Partnership and Suffolk Bus Service Improvement Plan, and other measures		Various	Essential	Suffolk County Council	£7,300,000 - £8,400,000	Suffolk County Council, Developers, ISPA Authorities	Unknown	£2,100,000 - £2,400,000	S106/CIL	£5,200,000-£6,000,000	Developer contributions from ISPA authorities	Over entire plan period (figures to 2026)		
Infrastructure improvements to support sustainable transport measures and junction improvements		Various	Essential	Suffolk County Council	£16,000,000 - £20,000,000 (up to 2026)	Developers, Suffolk County Council, ISPA authorities	Unknown	£4,500,000 - £5,600,000	S106/CIL	£11,500,000 - £14,400,000	Developer contributions from ISPA authorities	Over entire plan period (figures to 2026)		
Measures to increase capacity on Foxhall Road (from A12 to Heath Road)		Various	Essential	Suffolk County Council	£200,000 - £250,000	None	£0.00	£200,000 - £250,000	Section 106	Unknown	Unknown	Over entire plan period. <u>Note: there is a requirement for permitted site SCLP12.19 to deliver these improvements.</u>		
Measures to increase capacity on A1214		Various	Essential	Suffolk County Council	£4,000,000	None	Unknown. Proportion from East Suffolk TBC	Unknown	Section 106/ Section 278	Unknown	Developer contributions from ISPA Authorities	Over entire plan period		Partly included as a priority route within Suffolk's LCWIP and is a priority bus route within Suffolk's BSIP. The section in East Suffolk is a priority for the East Suffolk Active Travel Strategy
Measures to improve capacity at Melton crossroads		Melton	Essential	Suffolk County Council	£250,000 - £300,000	None	Unknown	£250,000 - £300,000	Section 106/Section 278	£0.00	N/A	Over entire plan period		Included as a priority in the East Suffolk Active Travel Strategy
Measures to improve capacity at A12/B1079 junction		Woodbridge	Essential	Suffolk County Council	£300,000 - £350,000	None	Unknown	£300,000 - £350,000	Section 106/ Section 278	£0.00	Central Government Funding, NSIPs	Over entire plan period		Included as a priority in the East Suffolk Active Travel Strategy

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Potential Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/ Progress	Status	Comments
Measures to improve capacity at B1121/Chantry Road junction, Saxmundham		Saxmundham	Essential	Developer	Unknown	None	Unknown	Unknown	Section 106/ Section 278	£0.00	N/A	Over entire plan period		
Provision of dedicated cycle paths and footpaths	TM1	Leiston	Essential	Parish Council, Developer	Unknown	Unknown	Unknown	Unknown	Neighbourhood CIL	Unknown	Unknown	Over Entire Plan Period		Part of Leiston Neighbourhood Plan
Local Cycling and Walking Infrastructure Plan Schemes		Various	Essential	Suffolk County Council	Unknown	None	Unknown	Unknown	Section 106/ Section 278	Unknown	Unknown	Over entire plan period		
<b>Total</b>					£ 100,471,001.70 - 100,861,469.30		£94,912,950.00	£ 5,558,051.74 – 5,926,520.37		£0.00				
<b>Total</b>					£107,876,937 - 153,811,937		£10,912,850 - 17,237,850	Unknown		Unknown				
<b>Total</b>					Unknown		Unknown	Unknown		Unknown				
<b>Overall Totals</b>					£208,311,938.70 - 254,637,406.30		£105,825,800 - 112,150,800	Unknown		Unknown				

## Early Years Education

Note: The cost of mainstream Early Years places is currently based on average costs published annually in the DfE School Place Scorecard. However, as these costs are based on historic projects, local evidence of higher costs is expected to be published later in the (updated) SCC Developers Guide to infrastructure contributions in Suffolk.

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Required Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/Progress	Status	Comments
Additional 30 pre-school places at Holton St Peter Primary School		Holton	Essential	Suffolk County Council	£615,240	None	£0	£615,240.00	CIL	£0.00	None	Short term		To be delivered in addition to the new setting at Dairy Farm, Halesworth (WLP4.5). CIL bid for £615,240 approved in 2021. Second CIL bid submitted in 2022 to cover shortfall due to material costs and site-specific conditions
Additional Early Education Capacity in Framlingham Ward	SCLP12.1, SCLP12.49, SCLP12.53	Framlingham	Essential	Suffolk County Council	£414,322.92	Unknown	£0	£414,322.92	CIL	£0.00	None	Unknown		SCLP12.49 If required, 0.1ha of land on the site should be reserved for a new pre-school setting or a contribution made towards a new pre-school setting off-site. Need towards end of development. Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Masterplanning stage and Reserved Matters stage
Provision of a pre-school Centre on land at Playing Fields off Francis Road, Kessingland	CI3	Kessingland	Essential	Developer, Suffolk County Council	£1,304,640.00	None	Unknown	Unknown	S106, Neighbourhood CIL	Unknown	Unknown	Short Term		Part of Kessingland Neighbourhood Plan
New pre-school setting at Melton Primary School to provide additional Early Education Capacity in Woodbridge Ward	SCLP12.32, SCLP12.33	Melton and Woodbridge	Essential	Suffolk County Council	£1,350,000.00	Unknown	£0	£509,488.00	CIL	£840,512.00	None	Short - Medium term		Some expansion possible. A project to provide additional Early Years places is currently being developed to deliver additional Early Education Capacity in Melton
Pre-school provision at Brightwell Lakes	SCLP12.19	Martlesham	Essential	Suffolk County Council	£935,601.00	None	£0	£935,601.00	Section 106	£0.00	None	Short - medium term		Including built provision (344m2 indoor space, 285m2 outdoor space). A contribution of approximately £18,000,000 will be required for education provision at Brightwell Lakes. This will cover pre-school, primary, secondary and further education. £935,601 secured from the s106 towards the pre-school
1 new pre-school setting at new primary school on North Lowestoft Garden Village	WLP2.13	Corton	Essential	Suffolk County Council	£1,306,440.00	None	£0	£1,306,440.00	Section 106	£0.00	None	Short-medium term		60 place pre-school setting to delivered alongside the new primary school on North of Lowestoft Garden Village. Delivery dependent on housing growth build out. Land secured for £1. Fully serviced - minimum 2.2ha 420 place primary and for 60 FTE place setting. Location to be determined in consultation with SCC at Masterplanning stage and Reserved Matters stage
1 new pre-school setting in Gunton and Corton area (North Lowestoft Garden Village)	WLP2.13	Various	Essential	Suffolk County Council	£1,306,440.00	None	£0	£1,306,440.00	Section 106	£0.00	None	Short-medium term		60 place pre-school part of a local shopping centre on North of Lowestoft Garden Village. Delivery dependent on housing growth build out. Setting would not be needed until after setting at new primary school is delivered. Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Masterplanning stage and Reserved Matters stage
1 new pre-school setting at new primary school in Kirkley Waterfront and Sustainable Urban Neighbourhood	WLP2.4	Lowestoft	Essential	Suffolk County Council	£1,306,440.00	None	£0	£1,306,440.00	Section 106	£0.00	None	Short-medium term		Kirkley Waterfront and Sustainable Urban Neighbourhood partially secured extant permission should this permission lapse the need is for a 60 place pre-school setting to delivered alongside the new primary school. Land secured for £1. Fully serviced - minimum 2.2ha 420 place primary and for 60 FTE place setting. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Reserved Matters stage
1 new pre-school setting in Kirkley and Whitton Area.	WLP2.4, WLP2.6	Various	Essential	Suffolk County Council	£1,306,440.00	None	£0	£1,306,440.00	Section 106	£0.00	None	Short-medium term		60 place pre-school setting in response to growth from Kirkley Waterfront and Sustainable Urban Neighbourhood. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Reserved Matters stage
1 new pre-school at new primary school on Beccles and Worlingham Garden Neighbourhood	WLP3.1	Various	Essential	Suffolk County Council	£1,306,440.00	None	£0	£1,306,440.00	Section 106	£0.00	None	Short-medium term		Pre-school setting to delivered alongside the new primary school. Land setting secured for £1. Fully serviced - minimum 2.2ha 420 place primary and for 60 FTE place setting. Location to be determined in consultation with SCC at Reserved Matters stage

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Required Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/Progress	Status	Comments
1 new pre-school setting at Community Hub in Beccles and Worlingham Garden Neighbourhood	WLP3.1	Various	Essential	Suffolk County Council	£1,306,440.00	None	£0	£1,306,440.00	Section 106	£0.00	None	Short-medium term		Stand alone Pre-school setting. Setting at primary school as part of WLP3.1 to be delivered first. Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Reserved Matters stage
1 new pre-school setting in Beccles and Worlingham area to serve development on Land West of London Road, Beccles	WLP3.2	Beccles	Essential	Suffolk County Council	£1,306,440.00	None	£0	£1,306,440.00	Section 106	£0.00	None	Short-medium term		Stand alone Pre-school setting. Setting at primary school as part of WLP3.1 to be delivered first. Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Reserved Matters stage
1 new pre-school setting at Land West of St Johns Road, Bungay	WLP5.2	Bungay	Essential	Suffolk County Council	£1,306,440.00	None	£0	£1,306,440.00	Section 106	£0.00	None	Short-medium term		0.09 hectares of land on the site should be made available for a new pre-school setting. Site needed by 300th dwelling occupation. Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Masterplanning stage and Reserved Matters stage
1 new pre-school setting in Oulton	WLP2.15	Oulton	Essential	Suffolk County Council	£1,306,440.00	None	£0	£1,306,440.00	Section 106	£0.00	None	Short-medium term		0.09 hectares of land on the site should be made available for a new pre-school setting. Site needed by 300th dwelling occupation. Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Reserved Matters stag.
1 new pre-school setting at new primary school on Land South of The Street	WLP2.16	Carlton Colville	Essential	Suffolk County Council	£1,306,440.00	None	£0	£1,306,440.00	Section 106	£0.00	None	Short-medium term		Pre-school setting to delivered alongside the new primary school. Site needed by 300th dwelling occupation. Land secured for £1. Fully serviced - minimum 2.2ha 420 place primary and for 60 FTE place setting. Location to be determined in consultation with SCC at Reserved Matters stage
Pre-school setting/s at South Saxmundham Garden Neighbourhood	SCLP12.29, SCLP12.30, SCLP12.43, SCLP12.52, SCLP12.59 SCLP12.1	Saxmundham	Essential	Suffolk County Council	£1,959,660.00	Unknown	£0	£1,894,338.00	Section 106	£65,322.00	Unknown	Short - Medium term		One form of entry primary school on a 2.2ha site to enable further expansion and pre-school provision. Second setting on 0.13ha of land reserved for a further new pre-school setting should suitable and accessible alternative provision not be available elsewhere in the town. Pre-school setting with primary school delivered first - Land setting secured for £1. Fully serviced - minimum 2.2ha 420 place primary and for 60 FTE place setting. Location to be determined in consultation with SCC at Reserved Matters stage
Pre-school settings at North Felixstowe Garden Neighbourhood	SCLP12.3, SCLP12.4	Felixstowe	Essential	Suffolk County Council	£4,572,540.00	Unknown	£0	£3,113,682.00	Section 106	£1,458,858.00	Extant Section 106/CIL	Short - Medium term		Provision of 630 primary school spaces and 90 place pre-school provision; Should be a further two 60 place settings elsewhere within the garden neighbourhood. Land secured for £1. Fully serviced - minimum 3ha 630 place primary and for 90 FTE place setting. Location to be determined in consultation with SCC at Reserved Matters stage. Two additional 60 place settings. Land secured for £1. Fully serviced - minimum 915.2sqm 60 FTE place settings. Location to be determined in consultation with SCC at Reserved Matters stage
Pre-school settings in Felixstowe – including at Walton High Street North, existing school sites and/or at Land at Brackenbury Sports Centre or Land at Sea Road	SCLP125, SCLP12.6	Felixstowe	Essential	Suffolk County Council	£1,959,660.00	Unknown	£0	£259,110.60	Section 106	£1,700,549.40	Extant Section 106/CIL	Short - Medium term		30 place at Caustone or Colneis primary or 12.5 reserve site at Brackenbury (0.1 ha if needed pre-school). 60 place Walton Green North
Pre-school setting with new primary school at Land Adjacent to Reeve Lodge and pre-school setting at Land off Howlett Way	SCLP12.64, SCLP12.65	Trimley St Martin	Essential	Suffolk County Council	£1,306,440.00	Unknown	£0	£1,001,604.00	Section 106	£304,836.00	Extant Section 106/CIL	Short - Medium term		SCLP12.65 Provision of 2.2ha of land for a primary school including and 0.1ha of land for pre-school. Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Masterplanning stage and Reserved Matters stage. provision; Reservation of a site on SCLP12.64 for a new pre-school setting on 0.1ha of land; Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Masterplanning stage and Reserved Matters stage
Pre-school setting/expansion of existing settings in Leiston and Aldeburgh	SCLP12.1, SCLP12.27, SCLP12.42, SCLP12.55	Various	Essential	Suffolk County Council	£1,306,440.00	Unknown	£0	£195,966.00	Section 106	£1,110,474.00	Unknown	Short - Medium term		Needs mainly from existing permissions - new development will only cover part of the cost. Expansion of existing setting. Mid local plan period

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Required Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/Progress	Status	Comments
Additional Early Education Capacity in Rendlesham Ward	SCLP1261, SCLP12.62	Rendlesham	Essential	Suffolk County Council	£163,764.00	Unknown	£0	£163,764.00	CIL	£0.00	CIL	Short – Medium term		No capacity to expand. May need to find places in adjacent wards if places are not available. SCC investigating possibilities
Additional Early Education Capacity in Fynn Valley Ward	SCLP12.66, SCLP12.67, SCLP12.70, SCLP12.71	Westerfield	Essential	Suffolk County Council	£163,764.00	Unknown	£0	£163,764.00	CIL	£0.00	None	Medium term		Improvements to be investigated
Additional Early Education Capacity in Kirton Ward	SCLP12.44, SCLP12.54, SCLP12.56	Kirton	Essential	Suffolk County Council	£109,176.00	Unknown	£0	£109,176.00	CIL	£0.00	None	Medium term		Improvements to be investigated
Additional Early Education Capacity in Wenhasston and Westleton Ward	SCLP12.1, SCLP12.47, SCLP12.48, SCLP12.69, SCLP12.68	Various	Essential	Suffolk County Council	£327,528.00	Unknown	£0	£327,528.00	CIL	£0.00	None	Medium term		No capacity to expand. May need to find places in adjacent wards if places are not available
Pre-school setting in Wickham Market Ward	SCLP12.1, SCLP12.46, SCLP12.51, SCLP12.60	Wickham Market	Essential	Suffolk County Council	£653,220.00	Unknown	£0	£479,028.00	Section 106	£174,192.00	Unknown	Medium term		SCLP12.60 Provision of 0.1ha of land for a new pre-school setting if needed. Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Masterplanning stage and Reserved Matters stage
1 new pre-school setting at Dairy Farm, Halesworth. Linked with other sites in Halesworth	WLP4.1, WLP4.2, WLP4.3, WLP4.4	Halesworth	Essential	Suffolk County Council	£1,306,440.00	None	£0	£1,306,440.00	Section 106	£0.00	None	Medium-long term		Standalone 60 place setting. Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Masterplanning stage and Reserved Matters stage
Pre-school setting at Land at Humber Doucy Lane, Rushmere St Andrew	SCLP12.24	Rushmere St Andrew	Essential	Suffolk County Council	£1,306,440.00	Unknown	£0	£304,836.00	Section 106	£1,001,604.00	Section 106 from other development	Long term		Cross border needs - Section 106 from other developments may need to fill gap. Provision of 0.1ha of land for an pre-school setting if needed within East Suffolk. Expected delivery after settings at Ipswich Garden Suburb are delivered. Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Masterplanning stage and Reserved Matters stage
Additional Early Education Capacity in Kesgrave Ward	SCLP12.1	Kesgrave	Essential	Suffolk County Council	£32,752.80	Unknown	£0	£32,752.80	CIL	£0.00	None	Unknown		Some expansion possible. Projects being investigated
Additional Early Education Capacity in Orford and Eyke Ward	SCLP12.57, SCLP12.45, SCLP12.50	Various	Essential	Suffolk County Council	£142,474.68	Unknown	£0	£142,474.68	CIL	£0.00	None	Unknown		SCLP12.50 - Eyke - site includes provision of land to accommodate expansion of primary school and pre-school setting if needed. Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Reserved Matters stage

<b>Total</b>					<b>£13,064,400.00</b>		<b>0</b>	<b>£13,679,640.00</b>		<b>£0.00</b>				
<b>Total</b>					<b>£16,660,223.40</b>		<b>0</b>	<b>£10,844,388.00</b>		<b>£5,815,835.40</b>				
<b>Total</b>					<b>Unknown</b>		<b>Unknown</b>	<b>Unknown</b>		<b>Unknown</b>				
<b>Overall Totals</b>					<b>£29,724,623.40</b>		<b>0</b>	<b>£24,524,028.00</b>		<b>£5,815,835.40</b>				

## Primary Education

*Note: The cost of mainstream school places is currently based on average costs published annually in the DfE School Place Scorecard. However, as these costs are based on historic projects, local evidence of higher costs is expected to be published later in the (updated) SCC Developers Guide to infrastructure contributions in Suffolk.*

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Required Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/ Progress	Status	Comments
Provision for 106 additional pupils for schools in Halesworth and Holton	WLP4.1, WLP4.2, WLP4.3, WLP4.4, WLP4.5, WLP7.15	Halesworth	Essential	Suffolk County Council	£1,830,408.00	None	£0	£1,364,272.00	CIL	£0.00	None	Short term	Green	The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is via expansion of Edgar Sewter CP School by 105 places from 315 to 420 places. CIL Bid for £1,364,272 approved in 2021. Project completed
New primary school at Trimley St Martin	SCLP12.54, SCLP12.64, SCLP12.65	Trimley St Martin	Essential	Suffolk County Council	£9,145,080.00	Unknown	£0	£2,841,507.00	Section 106	£6,303,573.00	Suffolk County Council (via prudential borrowing)	Short term	Red	The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity.  The proposed strategy for mitigating this growth is via the relocation and expansion of Trimley St Martin Primary School to a 2.2ha site within Land adjacent to Reeve Lodge, High Road, Trimley St Martin (SCLP12.65)
New school providing Early Years, Primary and Secondary education at Brightwell Lakes	SCLP12.19	Martlesham	Essential	Suffolk County Council	£18,000,000.00	None	£0	£18,000,000.00	Section 106	£0.00	Suffolk County Council (via prudential borrowing)	Short - medium term	Red	A contribution of approximately £18,000,000 will be required for education provision at Brightwell Lakes. This will cover pre-school, primary, secondary and further education. Final contributions will be determined once the mix of housing on the site has been fully established
Provision for additional 85 pupils at The Limes Primary School on Woods Meadow	WLP2.14, WLP2.15	Oulton	Essential	Suffolk County Council	£1,546,660.00	None	£0	£1,546,660.00	CIL	£0.00	None	Short – medium term	Red	The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is via The Limes Primary Academy, however this school is at capacity
Provision for 23 additional pupils at Blundeston CofE Primary School/ The Limes Primary School	WLP7.3, WLP7.4, WLP7.12	Blundeston	Essential	Suffolk County Council	£418,508.00	None	£0	£418,508.00	CIL	£0.00	None	Short-medium term	Red	The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity, The proposed strategy for mitigating this growth is via The Limes Primary Academy , however this school is at capacity.
Provision for 34 additional pupils in the vicinity of Southwold and Reydon	WLP6.1	Various	Essential	Suffolk County Council	£618,664.00	None	£0	£618,664.00	CIL	£0.00	None	Short-medium term	Red	The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is via expansion of the school by 105 places from 210 to 315 places which can only be achieved if adjacent land were secured. The County Council is investigating the acquisition of land to enable the expansion of Reydon Primary School. However, if it cannot be secured, the result would be that pupils are displaced into neighbouring catchments - Brampton, Wenhaston and Bramfield. This would represent a less sustainable pattern of development. Policy RNP2 of Southwold Neighbourhood Plan ensures the site will not be landlocked
Provision for 8 additional pupils at Ringsfield Primary School	WLP7.14	Ringsfield	Essential	Suffolk County Council	£145,568.00	None	£0	£145,568.00	CIL	£0.00	None	Short-medium term	Red	Growth may necessitate the expansion of the catchment school using developer contributions
New primary school at Felixstowe	SCLP12.3, SCLP12.5, SCLP12.6, SCLP12.4	Felixstowe	Essential	Suffolk County Council	£10,887,000.00	Unknown	£0	£9,411,811.50	Section 106	£1,475,188.50	Suffolk County Council (via prudential borrowing)	Short - Medium term	Red	The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is via the provision of a new primary school located on a 3ha site within the North Felixstowe Garden Neighbourhood (SCLP12.3). This may be phased, with smaller sites coming forward first before a larger site coming forward when available

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Required Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/ Progress	Status	Comments
Provision for additional places at Sir Robert Hitcham Primary School	SCLP12.1	Framlingham	Essential	Suffolk County Council	£454,900.00	Unknown	£0	£454,900.00	CIL	£0.00	Suffolk County Council (via prudential borrowing)	Short-medium term		Growth may necessitate the expansion of primary schools serving the area using developer contributions
New Primary School (including pre-school) on Kirkley Waterfront and Sustainable Urban Neighbourhood Site	WLP2.4	Lowestoft	Essential	Suffolk County Council	£9,145,080.00	Section 106 already signed for Brooke Peninsula which will provide approximately £4,730,434 depending on the exact mix of properties.	£4,730,434	£2,949,566.00	Section 106	£1,465,080.00	None	Medium term		Accommodate new students from WLP2.6. The proposed strategy for mitigating this growth is via the provision of a new primary school located on a 2.2ha site within the Kirkley Waterfront and Sustainable Urban Neighbourhood (WLP2.4). Costs may be amended due to flood mitigation measures
New Primary School (including pre-school) on Land South of The Street, Carlton Colville	WLP2.16	Carlton Colville	Essential	Suffolk County Council	£9,145,080.00	None	£0	£4,899,150.00	Section 106	£4,245,930.00	Suffolk County Council, CIL from future development	Medium term		The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is via the provision of a new primary school located on a 2.2ha site within Land South of The Street, Carlton Colville/Gisleham (WLP2.16)
New Primary School (including pre-school) on Beccles and Worlingham Garden Neighbourhood	WLP3.1	Beccles	Essential	Suffolk County Council	£9,145,080.00	None	£0	£6,804,375.00	Section 106	£2,340,705.00	Suffolk County Council, CIL from future development	Medium term		Will accommodate students from WLP3.2 and WLP7.13. The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is by the provision of a new primary school. A 2.2ha site should be reserved within WLP3.1 to allow for a primary school and early years setting to be provided on the site
New primary school at Saxmundham	SCLP12.29, SCLP12.30	Saxmundham	Essential	Suffolk County Council	£9,145,080.00	Unknown	£0	£4,708,627.50	Section 106	£4,436,452.50	Section 106 from other relevant development, Suffolk County Council (via prudential borrowing)	Medium term		The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is by the provision of a new primary school. A 2.2ha site should be reserved within the Saxmundham Garden Village to allow for a primary school and early years setting to be provided on the site
Provision for additional pupils at Bucklesham Primary School/Brightwell Lakes School	SCLP12.44	Various	Essential	Suffolk County Council	£145,568.00	Unknown	£0	£145,568.00	CIL	£0.00	Suffolk County Council (via prudential borrowing)	Medium term		Revised Strategy - pupils would need places as Brightwell Lakes New Primary School. Strategy has been agreed through application process
Provision for additional pupils at Woodbridge Primary School, (or St Mary's Primary)	SCLP12.1, SCLP12.32, SCLP12.33	Woodbridge	Essential	Suffolk County Council	£1,346,504.00	Unknown	£0	£1,346,504.00	CIL	£0.00	Suffolk County Council (via prudential borrowing)	Medium term		The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity.  The proposed strategy for mitigating this growth is via utilising available places at alternative schools in Woodbridge.  Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school, in the longer term
Provision for additional places at Martlesham Primary School	SCLP12.1, SCLP12.25	Martlesham	Essential	Suffolk County Council	£1,455,680.00	Unknown	£0	£1,455,680.00	CIL	£0.00	Suffolk County Council (via prudential borrowing)	Medium term		The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity.  The proposed strategy for mitigating this growth is via expansion of the school
New Primary School (including pre-school) on North Lowestoft Garden Village	WLP2.13	Corton	Essential	Suffolk County Council	£9,145,080.00	None	£0	£7,076,550.00	Section 106	£2,068,530.00	Suffolk County Council, CIL from future development	Medium – long term		The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity.  The proposed strategy for mitigating this growth is via the provision of a new primary school located on a 2.2ha site within the Lowestoft Garden Village (WLP2.13)

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Required Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/ Progress	Status	Comments
Provision for additional pupils at new Ipswich Garden Suburb Primary	SCLP12.24, SCLP12.66, SCLP12.67	Ipswich	Essential	Suffolk County Council	£1,091,760.00	Unknown	£0	£1,091,760.00	Section 106	£0.00	Section 106 from other relevant development, Suffolk County Council (via prudential borrowing)	Medium – Long term		The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity.  The proposed strategy for mitigating this growth is by the provision of a new primary school within the Ipswich Garden Suburb development
Provision for additional pupils at Hollesley Primary School	SCLP12.63	Hollesley	Essential	Suffolk County Council	£54,588.00	Unknown	£0	£54,588.00	CIL	£0.00	Suffolk County Council (via prudential borrowing)	Medium - Long term		The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity. However, the quantum of growth proposed for the catchment area does not automatically warrant permanent expansion of the catchment school. It is expected that the additional pupils arising from this development would take priority over some of the children coming from out of the catchment area (as at January 2020 c.33% of the school roll) over time through the admissions process. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school, in the longer term
Provision for additional pupils at Rendlesham Primary School	SCLP12.61, SCLP12.62	Rendlesham	Essential	Suffolk County Council	£473,096.00	Unknown	£0	£473,096.00	CIL	£0.00	Suffolk County Council (via prudential borrowing)	Medium - Long term		The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. However, the quantum of growth proposed for the catchment area does not automatically warrant permanent expansion of the catchment school. It is expected that the additional pupils arising from this development would take priority over some of the children coming from out of the catchment area (as at January 2020 c.10% of the school roll) over time through the admissions process. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school, in the longer term. Applications on both allocated sites have been approved
Provision for additional pupils at Easton Primary School	SCLP12.1, SCLP12.53	Easton	Essential	Suffolk County Council	£127,372.00	Unknown	£0	£127,372.00	CIL	£0.00	Suffolk County Council (via prudential borrowing)	Medium - Long term		The quantum of growth proposed for the catchment area does not automatically warrant permanent expansion of the catchment school. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school
Provision for additional pupils at Eyke Church of England Primary School	SCLP12.45, SCLP12.50	Eyke	Essential	Suffolk County Council	£363,920.00	Unknown	£0	£363,920.00	CIL	£0.00	Suffolk County Council (via prudential borrowing)	Medium - Long term		The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity. However, the quantum of growth proposed for the catchment area does not automatically warrant permanent expansion of the catchment school.  It is expected that the additional pupils arising from this development would take priority over some of the children coming from out of the catchment area (as at January 2020 c.59% of the school roll) over time through the admissions process.  Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school, in the longer term.  To preserve the ability of the school to expand should this be

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Required Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/ Progress	Status	Comments
														required in the future 0.4ha of land from SCLP12.50 will be reserved
Provision for additional pupils at St Marys CEVCP School, Benhall	SCLP12.43	Benhall	Essential	Suffolk County Council	£224,484 - 276,288	Unknown	£0	£224,484 - 276,288	Section 106/CIL	£0.00	Suffolk County Council (via prudential borrowing)	Medium - Long term		<p>The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity. However, the quantum of growth proposed for the catchment area does not automatically warrant permanent expansion of the catchment school.</p> <p>It is expected that the additional pupils arising from this development would take priority over some of the children coming from out of the catchment area (as at January 2020 c.70% of the school roll) over time through the admissions process.</p> <p>Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school, in the longer term</p>
Provision for additional places at Wenhaston Primary School	SCLP12.1	Wenhaston	Essential	Suffolk County Council	£109,176.00	Unknown	£0	£109,176.00	CIL	£0.00	Suffolk County Council (via prudential borrowing)	Medium - Long term		The quantum of growth proposed for the catchment area does not automatically warrant permanent expansion of the catchment school. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school
Provision for additional pupils at Leiston Primary School	SCLP12.1, SCLP12.27, SCLP12.42, SCLP12.55	Leiston	Essential	Suffolk County Council	£727,840.00	Unknown	£0	£727,840.00	CIL	£0.00	Suffolk County Council (via prudential borrowing)	Medium - Long term		SCLP12.42 and SCLP12.55 both have approved applications. SCLP12.27 is in Aldeburgh Primary's catchment and based on current forecasts the school has sufficient surplus capacity to accommodate the additional pupils arising from this development. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school
Provision for additional pupils at Kelsale Primary School	SCLP12.1, SCLP12.52	Kelsale Cum Carlton	Essential	Suffolk County Council	£224,484 - 276,288	Unknown	£0	£224,484 - 276,288	Section 106/CIL	£0.00	Suffolk County Council (via prudential borrowing)	Long term		Based on current forecasts the school has sufficient surplus capacity to accommodate the additional pupils arising from the development. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school
Provision for 15 additional pupils at Barnby North Cove Primary School	WLP7.2	Barnby	Essential	Suffolk County Council	£272,940.00	None	£0	£272,940.00	CIL	£0.00	None	Long term		<p>Based on current forecasts the school has sufficient surplus capacity to accommodate the additional pupils arising from this development.</p> <p>Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school</p>
Provision for 12 additional pupils at Brampton Community Primary School	WLP7.9, WLP7.10, WLP7.16	Brampton with Stoven	Essential	Suffolk County Council	£218,352.00	None	£0	£218,352.00	CIL	£0.00	None	Long term		<p>Based on current forecasts the school has sufficient surplus capacity to accommodate the additional pupils arising from this development.</p> <p>Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school</p>

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Required Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/ Progress	Status	Comments
Provision for 11 additional pupils at Ilketshall St Lawrence School	WLP7.11, WLP7.17	Ilketshall St Lawrence	Essential	Suffolk County Council	£200,156.00	None	£0	£200,156.00	CIL	£0.00	None	Long term		Based on current forecasts the school has sufficient surplus capacity to accommodate the additional pupils arising from this development. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school
Potential relocation of Bungay Primary School	WLP5.1, WLP5.2	Bungay	Essential	Suffolk County Council	Unknown	None	£0	Unknown	CIL	Unknown	None	Long term		Based on current forecasts the school has sufficient surplus capacity to accommodate the additional pupils arising from this development. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school
Provision for additional pupils at Dennington CEVCP School	SCLP12.49	Dennington	Essential	Suffolk County Council	£181,960.00	Unknown	£0	£181,960.00	CIL	£0.00	Suffolk County Council (via prudential borrowing)	Long term		Based on current forecasts the school has sufficient surplus capacity to accommodate the additional pupils arising from this development.  Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school
Provision for additional pupils at Witnesham Primary School	SCLP12.58, SCLP12.70, SCLP12.71	Witnesham	Essential	Suffolk County Council	£509,488.00	Unknown	£0	£509,488.00	CIL	£0.00	Suffolk County Council (via prudential borrowing)	Long term		Based on current forecasts the school has sufficient surplus capacity to accommodate the additional pupils arising from this development. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school. SCLP12.70 and SCLP12.71 both have pending applications on them (DC/21/4111/FUL and DC/22/0998/FUL). SCLP12.58 is in Otley Primary's catchment area
Provision for additional places at primary schools in Kesgrave	SCLP12.1	Kesgrave	Essential	Suffolk County Council	£90,980.00	Unknown	£0	£90,980.00	CIL	£0.00	Suffolk County Council (via prudential borrowing)	Unknown		Revision of strategy - The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity.  The proposed strategy for mitigating this growth is via utilising available places at alternative schools in Woodbridge.  Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school, in the longer term
<b>Total</b>					<b>£41,831,576.00</b>		<b>£0.00</b>	<b>£26,514,761.00</b>		<b>£10,120,245.00</b>				
<b>Total</b>					<b>£54,309,992.00</b>		<b>£0.00</b>	<b>£42,094,778.00</b>		<b>£12,215,214.00</b>				
<b>Total</b>					<b>None</b>		<b>None</b>	<b>None</b>		<b>None</b>				
<b>Overall Totals</b>					<b>£96,141,568.00</b>		<b>£0.00</b>	<b>£68,609,539.00</b>		<b>£22,335,459.00</b>				

## Secondary and Post 16 Education

Note: The cost of mainstream school places is currently based on average costs published annually in the DfE School Place Scorecard. However, as these costs are based on historic projects, local evidence of higher costs is expected to be published later in the (updated) SCC Developers Guide to infrastructure contributions in Suffolk.

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Required Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/Progress	Status	Comments
Expansion of Bungay High School		Bungay	Essential	Suffolk County Council	£3,787,950.00	Unknown	£0	£624,070.00	CIL	£3,163,880.00	Suffolk County Council (via prudential borrowing)	Short term		The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is via expansion of the 11-16 provision at the school by 150 places from 900 to 1050 places with a further possible expansion to 1200 to be required in the future. To future proof the school site 0.75ha has been reserved within policy WLP5.2 for the school site extension. CIL bid of £624,070 approved in 2021
New school providing Early Years, Primary and Secondary education at Brightwell Lakes	SCLP12.19	Martlesham	Essential	Suffolk County Council	£18,000,000.00	None	£0	£18,000,000.00	Section 106	£0.00	Suffolk County Council (via prudential borrowing)	Short - medium term		A contribution of approximately £18,000,000 will be required for education provision at Brightwell Lakes. This will cover pre-school, primary, secondary and further education. Final contributions will be determined once the mix of housing on the site has been fully established
Provision for additional pupils at East Point Secondary School		Lowestoft	Essential	Suffolk County Council	Unknown	Unknown	Unknown	Unknown	CIL	Unknown	Suffolk County Council (via prudential borrowing)	Medium term		A project to provide additional secondary and 6th form provision is currently being developed. CIL and S106 will be used
Provision for additional pupils at Northgate Secondary School		North Ipswich	Essential	Suffolk County Council	Unknown	Unknown	Unknown	Unknown	CIL	Unknown	Suffolk County Council (via prudential borrowing)	Medium term		As set out in a letter sent by SCC in response to the submission draft of the Waveney Local Plan (Reg 19) on 24/05/2018, it is understood that Pakefield School is unable to be expanded. Based on current forecasts, any additional demand for places generated from development will likely need to be met at East Point Academy which would require expansion to accommodate growth in the area
Expansion of Thomas Mills High School, Framlingham		Framlingham	Essential	Suffolk County Council	£2,348,529.00	Unknown	£0	£2,348,529.00	CIL	£0.00	Suffolk County Council (via prudential borrowing)	Over entire plan period		The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity.  The proposed strategy for mitigating this growth is via expansion of the school
Expansion of Felixstowe Academy		Felixstowe	Essential	Suffolk County Council	£1,363,662.00	Unknown	£0	£1,363,662.00	CIL	£0.00	Suffolk County Council (via prudential borrowing)	Over entire plan period		The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity.  The proposed strategy for mitigating this growth is via expansion of Felixstowe Academy
Provision for additional pupils at Brightwell Lakes Secondary School		Martlesham	Essential	Suffolk County Council	£16,106,350.00	Unknown	£0	£16,106,350.00	CIL	£0.00	Suffolk County Council (via prudential borrowing)	Over entire plan period		The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity.  The proposed strategy for mitigating this growth is via the new Brightwell Lakes Secondary School
Provision for additional pupils at Ipswich Garden Suburb Secondary School		Ipswich	Essential	Suffolk County Council	£1,085,879.00	Unknown	£0	£1,085,879.00	CIL	£0.00	Suffolk County Council (via prudential borrowing)	Over entire plan period		The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity.  The proposed strategy for mitigating this growth is by the provision of a new secondary school within the Ipswich Garden Suburb development
Provision for additional pupils at Claydon High School		Claydon	Essential	Suffolk County Council	£277,783.00	Unknown	£0	£277,783.00	CIL	£0.00	Suffolk County Council (via prudential borrowing)	Over entire plan period		The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity. Contributions are expected to be sought to enable expansion.  The maximum level of expansion achievable on the existing site is a small increase 82 places. However, it is expected that demand from development and background population will mean that this expansion is not sufficient to mitigate this growth. The remainder of the additional demand will be met through out-of-catchment pupils from Ipswich being diverted back to Ipswich secondary schools in the longer term. Significant available capacity exists at Westbourne High School and the new Ipswich Garden Suburb secondary is planned to provide for the north and west of Ipswich.

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Required Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/ Progress	Status	Comments
														If needed, temporary places could be provided at schools in Ipswich, to manage short-term excess demand

<b>Total</b>					Unknown		Unknown	Unknown		Unknown				
<b>Total</b>					£42,970,153.00		£0.00	£39,806,273.00		£3,163,880.00				
<b>Total</b>					None		None	None		None				
<b>Overall Totals</b>					£42,970,153.00		£0.00	£39,806,273.00		£3,163,880.00				

## Health

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Required Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/Progress	Status	Comments
Additional floorspace and enhancements at Framlingham Surgery		Framlingham	Essential	Suffolk and North East Essex ICB	£300,000.00	Unknown	£177,600.00	£122,400.00	CIL	£0.00	NHS England	Short term		2017/18 DCIL £122,400. £122,400 from Fram GP Practice and £55,200 from Estates Technology and Transformation Funding (ETTF) scheme
Enhancements at Little St John Street Surgery, Woodbridge		Woodbridge	Essential	Suffolk and North East Essex ICB	£60,000.00	NHS England	£30,000.00	£30,000.00	CIL	Unknown	None	Short term		2017/18 DCIL £30,000 allocated to Little St John Street Surgery. Possible extension still needed in the area to deal with extra population proposed in the Local Plan
Additional floorspace and enhancements at Wickham Market Practice and its branch Rendlesham Surgery		Various	Essential	Suffolk and North East Essex ICB	£194,000.00	Unknown	£194,000.00	None	None	Unknown	NHS England	During plan period		Work has been completed to increase capacity at Rendlesham branch Surgery. No developer contribution was requested
Additional floorspace needed at Saxmundham Health Centre		Saxmundham	Essential	Suffolk and North East Essex ICB	Unknown	3PD	Unknown	£600,000.00	CIL	Unknown	NHS England/another	Short term		The ICB is working with the practice on options for creating the needed capacity and this could involve reconfiguration, extension or a new location for the surgery
Martlesham/Birches increase in floorspace		Martlesham	Essential	Suffolk and North East Essex ICB	Unknown	3PD	Unknown	£320,000.00	CIL	#VALUE!	NHS England/another	Short term		The ICB are working with both Martlesham Heath Surgery and the Birches Medical Centre at increasing capacity in the locality and options are currently being assessed
Increasing capacity at Little St John Street Surgery, Woodbridge		Woodbridge	Essential	Suffolk and North East Essex ICB	Unknown	Unknown	Unknown	£150,000.00	CIL	Unknown	NHS England	Short term		The ICB is looking at increasing capacity of health services in Woodbridge as a result of the increase in population. A number of proposals are being looked at as part of a collaborative approach with health providers within the ICS
Additional primary care floorspace in the Felixstowe, Kirton and Trimleys areas		Various	Essential	Suffolk and North East Essex ICB	Unknown	Unknown	Unknown	£820,000.00	Section 106/CIL	Unknown	NHS England/another	Short term		Work is being done with the local Primary Care Network to assess the impact of proposed developments in the area and how best to mitigate the impact on health services. Required developer contribution reflects allocations in the Local Plan
Health contribution relating to Brightwell Lakes development	SCLP12.19	Martlesham	Essential	Suffolk and North East Essex ICB	Unknown	3PD	Unknown	£750,000.00	Section 106	Unknown	NHS England/another	Medium term		Possible longer term plan to mitigate the increase capacity associated with the Brightwell Lakes development

Bridge Road new build  Expansion of space in Lowestoft in response to Kirkley waterfront & Garden village developments (TBC)		Lowestoft	Essential	Norfolk and Waveney ICB	Unknown	Unknown	Unknown	Land through S106 to support Bridge Road new build  £6,652,896 estimated through HUDU in response to Kirkley & Garden Village	CIL	Unknown	NHS England	During plan period		Bridge Road Surgery project: S106 land available on Woods Meadow development Potentially other estate projects to be brought forward Lowestoft PCN have highest space utilisation in the ICS. The following split highlights additional space requirements in response to the 2 projects listed.  Kirkley Waterfront = C. Acute 188m <sup>2</sup> Mental Health 21m <sup>2</sup> Intermediate care 34m <sup>2</sup> GP & Community 203m <sup>2</sup>  Garden Village= C. Acute 228m <sup>2</sup> Mental Health 29m <sup>2</sup> Intermediate care 41m <sup>2</sup> GP & Community 264m <sup>2</sup>
Expansion of total floorspace in Beccles		Beccles	Essential	Norfolk and Waveney ICB	Unknown	Unknown	Unknown	TBC	CIL	Unknown	NHS England	During plan period		Beccles Medical Centre - extension to existing premises completing May 2021. Current registration constraint c. 9000  Developments due to build within the area in the next 5 years, further expansion required to manage constraint?
Expansion of clinical floorspace in Halesworth		Halesworth	Essential	Norfolk and Waveney ICB	£424,882.00	Unknown	Unknown	£424,882.00	CIL	Unknown	NHS England	During plan period		Current registration constraint c.2439 Potential new registrations for Halesworth area from housing: 1724  Developments due to build within the area in the next 5 - 10 years, further expansion required to manage constraint
Expansion of clinical floorspace in Southwold		Southwold	Essential	Norfolk and Waveney ICB	Unknown	Unknown	Unknown	TBC	CIL	Unknown	NHS England	During plan period		Sole Bay Health Centre Current registration constraint c. 2199 Potential new registrations for Southwold area from housing: 670  Developments due to build within the area in the next 5 - 10 years, further expansion required to manage constraint
Expansion of clinical floorspace in Bungay		Bungay	Essential	Norfolk and Waveney ICB	£1,524,000	£241,000	VAT reclaim	£1,283,000	CIL	None		During plan period		Bungay Medical Practice Current registration constraint c. 11,500. 15% of current patients live in South Norfolk  Developments being built and due to be built within the area in the next 5 - 10 years, further expansion required to manage constraint
Additional enhancements at Grundisburgh Surgery and Otley Surgery (both are branches of the Debenham Practice)		Various	Essential	Suffolk and North East Essex ICB	Unknown	Unknown	Unknown	£57,500.00	CIL	Unknown	NHS England/another	During plan period		Required developer contribution reflects allocations in the Local Plan
Additional enhancements at The Peninsula Practice and its branches Chapman House and Church Farm Surgery		Various	Essential	Suffolk and North East Essex ICB	Unknown	Unknown	Unknown	£18,900.00	CIL	Unknown	NHS England/another	During plan period		Aldeburgh Church Farm is now a branch of The Peninsula Practice. Currently options are being looked at in this area but PCN capacity will determine the strategy going forward. Required developer contribution reflects allocations in the Local Plan

Additional floorspace at Leiston Surgery and its branch Yoxford Surgery		Various	Essential	Suffolk and North East Essex ICB	£90,000.00	Unknown	Unknown	£90,000.00	CIL	None	NHS England/another	Short term		This project has been withdrawn
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<b>Total</b>					£424,882.00		£0.00	£424,882.00		£0.00				
<b>Total</b>					£554,000.00		Unknown	£2,868,800.00		Unknown				
<b>Total</b>					None		None	None		None				
<b>Overall Totals</b>					£978,882.00		Unknown	£3,293,682.00		£0.00				


## Libraries

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Required Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/Progress	Status	Comments
Improvements at Framlingham library	SCLP12.46, SCLP12.49, SCLP12.53	Framlingham	Desirable	Suffolk County Council	£57,888.00	None	£0	£57,888.00	CIL	£0.00	Suffolk County Council	Short-medium term		Linked with Neighbourhood Plan requirements (SCLP12.1). Approximate costs may change during review of Developers Contributions Guide. Project being developed
Enhanced library provision at Kesgrave	SCLP12.24	Kesgrave	Desirable	Suffolk County Council	£36,720.00	None	£0	£36,720.00	CIL	£0.00	Suffolk County Council	Medium term		Approximate costs may change during review of Developers Contributions Guide. CIL and S106 to be used. Project now being developed
Improvements to capacity of Lowestoft Library	WLP2.8, WLP2.13 and WLP2.20	Lowestoft	Desirable	Suffolk County Council	£304,560.00	None	£0	£304,560.00	CIL	£0.00	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide
Improvements to capacity of Oulton Broad Library	WLP2.4, WLP2.6, WLP2.14, WLP2.15, WLP2.16	Oulton Broad	Desirable	Suffolk County Council	£578,232.00	None	£0	£578,232.00	CIL	£0.00	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide
Improvements to capacity of Beccles Library	WLP3.1, WLP3.2, WLP7.2, WLP7.13, WLP7.14, WLP7.16	Beccles	Desirable	Suffolk County Council	£351,216.00	None	£0	£351,216.00	Section 106	£0.00	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide. Also supported by Beccles Neighbourhood Plan Policy BECC2
Improvements to capacity of Bungay Library	WLP5.1, WLP5.2	Bungay	Desirable	Suffolk County Council	£104,760.00	None	£0	£104,760.00	CIL	£0.00	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide. CIL Bid submitted - Project for extended and updated entrance lobby to provide storage and provide a fully accessible entrance. Total project cost £154,000 with a CIL bid for £32,400
Improvements to capacity of Halesworth Library	WLP4.1 - 4.5, WLP7.9, WLP7.10, WLP7.11, WLP7.15, WLP7.17	Halesworth	Desirable	Suffolk County Council	£127,656.00	None	£0	£127,656.00	CIL	£0.00	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide
Improvements to capacity of Kessingland Library	WLP7.8	Kessingland	Desirable	Suffolk County Council	£12,960.00	None	£0	£12,960.00	CIL	£0.00	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide
Improvements to capacity of Southwold Library	WLP6.1, WLP7.7	Southwold	Desirable	Suffolk County Council	£50,976.00	None	£0	£50,976.00	CIL	£0.00	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide
Library contribution relating to Brightwell Lakes development	SCLP12.19	Martlesham/Various	Desirable	Suffolk County Council	£27,000.00	None	£0	£27,000.00	Section 106	£0.00	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide
Enhanced library provision for Felixstowe and the Trimleys	SCLP12.3 - 12.6, SCLP12.54, SCLP12.64, SCLP12.65	Various	Desirable	Suffolk County Council	£486,216.00	None	£0	£486,216.00	CIL	£0.00	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide
Improvements at Wickham Market library		Wickham Market	Desirable	Suffolk County Council	£47,520.00	None	£0	£47,520.00	CIL	£0.00	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide
Improvements at Aldeburgh library	SCLP12.27, SCLP12.42	Aldeburgh	Desirable	Suffolk County Council	£10,800.00	None	£0	£10,800.00	CIL	£0.00	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide
Improvements at Halesworth library	SCLP12.59	Halesworth	Desirable	Suffolk County Council	£3,024.00	None	£0	£3,024.00	CIL	£0.00	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide
Enhanced library provision for areas surrounding Ipswich	Policies SCLP12.19, SCLP12.44, SCLP12.56, SCLP12.66, SCLP12.70	Various	Desirable	Suffolk County Council	£31,320.00	None	£0	£31,320.00	CIL	£0.00	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide
Enhanced library provision at Leiston	SCLP12.55	Leiston	Desirable	Suffolk County Council	£25,056.00	None	£0	£25,056.00	CIL	£0.00	Suffolk County Council	Over plan period		Linked with Neighbourhood Plan requirements (SCLP12.1). Approximate costs may change during review of Developers Contributions Guide

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Required Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/Progress	Status	Comments
Improvements at Saxmundham library	SCLP12.29, SCLP12.30, SCLP12.48, SCLP12.52, SCLP12.68, SCLP12.69	Saxmundham	Desirable	Suffolk County Council	£247,320.00	None	£0	£247,320.00	CIL	£0.00	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide
Enhanced library provision at Southwold		Southwold	Desirable	Suffolk County Council	£5,400.00	None	£0	£5,400.00	CIL	£0.00	Suffolk County Council	Over plan period		Linked with Neighbourhood Plan requirements (SCLP12.1). Approximate costs may change during review of Developers Contributions Guide
Improvements at Woodbridge library	SCLP12.32, SCLP12.33, SCLP12.45, SCLP12.50, SCLP12.51, SCLP12.25, SCLP12.57, SCLP12.58, SCLP12.60, SCLP12.61, SCLP12.62, SCLP12.63	Woodbridge	Desirable	Suffolk County Council	£176,472.00	None	£0	£176,472.00	CIL	£0.00	Suffolk County Council	Over plan period		Linked with Neighbourhood Plan requirements (SCLP12.1). Approximate costs may change during review of Developers Contributions Guide

<b>Total</b>					<b>£1,530,360.00</b>		<b>£0.00</b>	<b>£1,530,360.00</b>		<b>£0.00</b>				
<b>Total</b>					<b>£1,154,736.00</b>		<b>£0.00</b>	<b>£1,154,736.00</b>		<b>£0.00</b>				
<b>Total</b>					<b>None</b>		<b>None</b>	<b>None</b>		<b>None</b>				
<b>Overall Totals</b>					<b>£2,685,096.00</b>		<b>£0.00</b>	<b>£2,685,096.00</b>		<b>£0.00</b>				

## Waste

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Required Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/Progress	Status	Comments
Expansion of Foxhall household waste recycling centre		Foxhall	Essential	Suffolk County Council	£7,800,000.00	Suffolk County Council	£5,000,000.00	£794,414.00	CIL	Unknown	Unknown	Short term		Current project is currently being delivered on site. This design will almost double the size of the current site by expanding into adjacent land and will address highway access and queuing issues and provide a split level infrastructure to avoid the public having to use steps to access containers. The new site should future proof the service in this area for approximately 25 years. CIL Bid approved in 2021. Completion expected in Winter 2023
Lowestoft Waste Transfer Station and Recycling Centre Infrastructure Upgrade		Lowestoft	Essential	Suffolk County Council	£3,100,000.00	Suffolk County Council	Unknown	£751,642.00	CIL	Unknown	None	Medium-long term		This project has been under review in order to address capacity and queuing issues and to provide services such as food waste disposal. Improvements will future proof the site for 25 years. Expected completion during 2024. Some improvements have already been carried out
Relocation of Stowmarket waste recycling centre		Stowmarket	Essential	Suffolk County Council	£4,000,000.00	Unknown	Unknown	£6,780.00	CIL	Unknown	Unknown	Over entire plan period		This site is too small for the catchment area it serves, particularly taking into account the amount of past and future planned developments in this area. There are also highway access issues. This recycling centre replacement has been identified as a high priority and a project has commenced to identify an alternative site. £1m has been earmarked for locating to a new site only. Total cost of constructing a new site is approximately £4m. Related to development at SCLP12.58. Project being investigated with Babergh and Mid-Suffolk District Councils
Improvements to Leiston household waste recycling centre		Leiston	Essential	Suffolk County Council	£500,000 - £1,750,000	Unknown	Unknown	Unknown	CIL	Unknown	Unknown	Over entire plan period		Project established to consider future RC provision in this area and to identify necessary improvements to site access. Site is also part of Waste Infrastructure Strategy Review
Improvements to Felixstowe household waste recycling centre		Felixstowe	Essential	Suffolk County Council	£2,500,000.00	Unknown	Unknown	Unknown	CIL	Unknown	Unknown	Over entire plan period		This project is kept under review as developments in the immediate Felixstowe vicinity are increasing the demand at this recycling centre. Site is also part of Waste Infrastructure Strategy Review

<b>Total</b>					<b>£3,100,000.00</b>		<b>Unknown</b>	<b>£751,642.00</b>		<b>Unknown</b>				
<b>Total</b>					<b>£14,300,000.00</b>		<b>Unknown</b>	<b>£801,194.00</b>		<b>Unknown</b>				
<b>Total</b>					<b>None</b>		<b>None</b>	<b>None</b>		<b>None</b>				
<b>Overall Totals</b>					<b>£17,400,000.00</b>		<b>Unknown</b>	<b>£1,552,836.00</b>		<b>Unknown</b>				

## Utilities

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Required Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/Progress	Status	Comments
Potential upgrades to electricity network in Beccles		Beccles	Critical	UK Power Networks.	Unknown	None	Unknown	Unknown	Section 106	Unknown	UK Power Networks, New Anglia, Enterprise Zone Pot B	Medium/Long term		
Potential improvements to the 11kv network between Saxmundham and Benhall primary substation		Various	Critical	UK Power Networks	Unknown	Unknown	Unknown	Unknown	Section 106	Unknown	Unknown	During plan period		
Potential improvements to Peasenhall primary substation		Peasenhall	Critical	UK Power Networks	Unknown	Unknown	Unknown	Unknown	Section 106	Unknown	Unknown	During plan period		
Potential need for new primary substation at Sevenhills Roundabout		Nacton	Critical	UK Power Networks	Unknown	Unknown	Unknown	Unknown	Section 106	Unknown	OFGEM	During plan period		
<b>Total</b>					Unknown		Unknown	Unknown		Unknown				
<b>Total</b>					Unknown		Unknown	Unknown		Unknown				
<b>Total</b>					None		None	None		None				
<b>Overall Totals</b>					Unknown		Unknown	Unknown		Unknown				

## Police

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Required Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/ Progress	Status	Comments
Contribution to police provision, including recruitment and equipment of Community Support Officer, at Brightwell Lakes	SCLP12.19	Martlesham	Essential	Suffolk Constabulary	£156,898.00	Unknown	£0	£156,898.00	Section 106	£0.00	Suffolk Constabulary	Short - medium term		
Potential new police facility / extensions to existing estate		Various	Essential	Suffolk Constabulary	£8,000,000.00	Unknown	£0	£337,500.00	CIL	£7,662,500.00	Suffolk Constabulary	Over entire plan period		Developer contribution responds to growth in the Local Plan. Additional funding will be needed if a new facility is required
Increase in police staffing levels across the District		Various	Essential	Suffolk Constabulary	£145,012.00	Unknown	£0	£145,012.00	CIL	£0.00	Suffolk Constabulary	Over entire plan period		
6 new police vehicles		Various	Essential	Suffolk Constabulary	£124,500.00	Unknown	£0	£124,500.00	CIL	£0.00	Suffolk Constabulary	Over entire plan period		
135 square metres of new office floorspace		Various	Essential	Suffolk Constabulary	£337,500.00	Unknown	£0	£337,500.00	CIL	£0.00	Suffolk Constabulary	Over entire plan period		Not needed if new facility is delivered
4 new Automatic Number Plate Recognition points		Various	Essential	Suffolk Constabulary	£240,292.00	Unknown	£0	£240,292.00	CIL	£0.00	Suffolk Constabulary	Over entire plan period		
South Saxmundham Garden Neighbourhood (Policy SCLP 12.29): 35m <sup>2</sup> of additional police floorspace, recruitment/training/equipping police officers/police community support officers/back office staff, 2 x police vehicles, automatic number plate recognition technology.	SCLP12.29	Saxmundham	Essential	Suffolk Constabulary	£633,753.00	Unknown	£0	£633,753.00	Section 106	£0.00	Suffolk Constabulary	During plan period		
North Felixstowe Garden Neighbourhood (Policy SCLP 12.3): 95m <sup>2</sup> of additional police floorspace, recruitment/training/equipping police officers/police community support officers/back office staff, 3 x police vehicles, automatic number plate recognition technology.	SCLP12.3	Felixstowe	Essential	Suffolk Constabulary	£1,081,357.00	Unknown	£0	£1,081,357.00	Section 106	£0.00	Suffolk Constabulary	During plan period		
<b>Total</b>					<b>£8,847,304.00</b>		<b>£0.00</b>	<b>£1,184,804.00</b>		<b>£7,662,500.00</b>				
<b>Total</b>					<b>£1,872,008.00</b>		<b>£0.00</b>	<b>£1,872,008.00</b>		<b>£0.00</b>				
<b>Total</b>					<b>None</b>		<b>None</b>	<b>None</b>		<b>None</b>				
<b>Overall Totals</b>					<b>£10,719,312.00</b>		<b>£0.00</b>	<b>£3,056,812.00</b>		<b>£7,662,500.00</b>				

## Community Centres

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Required Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/Progress	Status	Comments
New community centre in Bungay		Bungay	Essential	Bungay Honeypot Trust	£746,460.00	Sale of existing community centre for housing.	£380,000.00	£366,460.00	CIL	£0.00	None	Short term		£366,460 DCIL Allocated 2018/19 - £350,000 from sale of the land £30,000 from Bungay Honeypot Trust
Easton & Letheringham Village Hall Refurbishment		Easton and Letheringham	Desirable	Easton and Letheringham Village Hall Committee	£48,000.00	Easton and Letheringham Village Hall Committee	£10,000.00	£38,000.00	CIL	£0.00	None	Short term		DCIL Funding 2018/19. £10,915.44 underspent
Woodbridge - Jetty Lane Community Centre Feasibility Study		Woodbridge	Desirable	Jetty Lane Community Interest Company (CIC)	£3,140,000.00	Fundraising	£2,951,200.00	£188,800.00	CIL	£0.00	None	Short term		DCIL Funding 2018/19
Framlingham - St Michael's Rooms Community Centre		Framlingham	Desirable	Parochial Church Council, Framlingham Town Council	£840,000.00	Framlingham Town Council and donations	£140,000.00	£700,000.00	CIL	£0.00	None	Short term		DCIL Funding 2018/19. Construction began January 2022 and was completed in January 2023
Worlingham Community Centre		Worlingham	Essential	Worlingham Parish Council	£1,219,478.00	Parish Council	£1,000,000.00	£219,478.00	CIL	£0.00	None	Short term		£219,478 DCIL allocated, £70,000 for feasibility (2018/19, £4,824.30 underspent) and £149,478 for capital costs (2019/20)
New community centre in Halesworth on Dairy Farm site (Policy WLP4.5)	WLP4.5	Halesworth	Essential	East Suffolk Council, Developers	£715,540.00	Sale of existing community facilities.	Unknown	Unknown	CIL	Unknown	None	Short term.		Update once funds from sale of existing facilities has been confirmed. Approximate cost based on BCIS data
Improvements to Community Facilities at Recreation Ground, Victory Road, Leiston.		Leiston	Desirable	Parish Council	Unknown	Heritage Lottery Fund	Unknown	Unknown	Neighbourhood CIL	Unknown	Unknown	Short Term		Included in Leiston Neighbourhood Plan
Provision of community facilities at Playing Fields, Melton Road (MEL9)	MEL9	Melton	Desirable	Parish Council	Unknown	Heritage Lottery Fund	Unknown	Unknown	Neighbourhood CIL	Unknown	Unknown	Short Term		Included in Melton Neighbourhood Plan
New community facility totalling 450-500sqm internal area including changing facilities and separate office for police at Brightwell Lakes	SCLP12.19	Martlesham	Essential	Developer	Unknown	None	£0.00	Unknown	Section 106	Unknown	None	Short - medium term		
New community centre at North Felixstowe Garden Neighbourhood	SCLP12.3	Felixstowe	Essential	Developer	Unknown	Unknown	Unknown	Unknown	Section 106	Unknown	Unknown	Short term		
New community centre in Somerleyton		Somerleyton	Essential	East Suffolk Council, Developers	£301,280.00	None	£0.00	£301,280.00	CIL	£0.00	None	Short-medium term		A contribution from the local community/neighbourhood CIL will be required. Approximate cost based on BCIS data. Supported by the Lound, Ashby, Herringfleet and Somerleyton Neighbourhood Plan Policy LAHS 7
New community centre in Brampton	WLP7.9	Brampton with Stoven	Essential	East Suffolk Council, Developers	£301,280.00	None	£0.00	£301,280.00	Section 106/CIL	£0.00	None	Short-medium term		Unknown if this can be delivered with site. Approximate cost based on BCIS data
Refurbishment of community centre in Ringsfield		Ringsfield	Essential	East Suffolk Council, Developers	Unknown	None	£0.00	Unknown	CIL	Unknown	None	Short-medium term		A contribution from the local community/neighbourhood CIL will be required

New community centre in Carlton Colville		Carlton Colville	Essential	East Suffolk Council, Developers	£715,540.00	None	£214,000.00	£501,540.00	CIL	£0.00	None	Medium term		A contribution from the local community/neighbourhood CIL will be required. Approximate cost based on BCIS data
New community centre in Beccles	WLP3.1, BECC1	Beccles	Essential	East Suffolk Council, Developers	£715,540.00	None	£0.00	£715,540.00	Section 106	£0.00	None	Medium term		Approximate cost based on BCIS data. Additional requirements set out in Beccles Neighbourhood Plan Policy BECC1)
New community centre on North of Lowestoft Garden Village	WLP2.13	Corton	Essential	East Suffolk Council, Developers	£715,540.00	None	£0.00	£715,540.00	Section 106	£0.00	None	Long term		Delivered with site. Approximate cost based on BCIS data
New community centre in Framlingham	FRAM22	Framlingham	Desirable	Parish Council, Developer	Unknown	Unknown	Unknown	Unknown	Neighbourhood CIL	Unknown	Unknown	Over Plan Period		Part of the Framlingham Neighbourhood Plan
Provision of a new community centre and facilities at Waterloo Avenue	IN2	Leiston	Desirable	Parish Council, Developer	Unknown	Unknown	Unknown	Unknown	Neighbourhood CIL	Unknown	Unknown	Over Plan Period		Part of Leiston Neighbourhood Plan
Development of a new community centre and changing rooms on Somerleyton Playing Field	LAHS 7	Somerleyton	Desirable	Developer	£715,540.00	None	Unknown	£715,540.00	Neighbourhood CIL	Unknown	Unknown	Over Plan Period		Included in Lound, Ashby, Herringfleet and Somerleyton Neighbourhood Plan
<b>Total</b>					<b>£6,270,658.00</b>		<b>£1,734,000.00</b>	<b>£3,821,118.00</b>		<b>Unknown</b>				Gap potentially more if sale of existing community facilities at Halesworth do not cover cost of new provision
<b>Total</b>					<b>£3,188,000.00</b>		<b>£2,961,200.00</b>	<b>£226,800.00</b>		<b>Unknown</b>				
<b>Total</b>					<b>Unknown</b>		<b>Unknown</b>	<b>Unknown</b>		<b>Unknown</b>				
<b>Overall Totals</b>					<b>£9,458,658.00</b>		<b>£4,695,200.00</b>	<b>£4,047,918.00</b>		<b>Unknown</b>				

## Green Infrastructure

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Required Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/ Progress	Status	Comments
East of England Park	WLP2.5	Lowestoft	Essential	East Suffolk Council	£1,086,078.00	Coastal Communities Fund	£997,901.00	£88,000.00	CIL	£0.00	None	Short term		DCIL funding 2018/19 - £88,000
Beccles Quay		Beccles	Desirable	East Suffolk Council, Beccles Town Council and Broads Authority	£90,339.00	Beccles Fenland Trust	£6,339.00	£84,000.00	CIL	£0.00	None	Short term		£90,339 quay improvement project - funded by DCIL (2018/19) £84,000 and £6,339 Beccles Fenland Charity Trust
Open space provision at North Felixstowe Garden Neighbourhood	SCLP12.3	Felixstowe	Essential	Developer	Unknown	Unknown	Unknown	Unknown	Section 106	Unknown	Unknown	Short – medium term		Delivered with site. First phase approved by appeal.
Cemetery expansion with public toilets and parking	SA1	Leiston	Desirable	Developer	Unknown	Unknown	Unknown	Unknown	Section 106, Neighbourhood CIL	Unknown	Unknown	Over Plan Period		Part of Leiston Neighbourhood Plan
1ha of open space for informal recreation on Land to the east of St Margaret's Road	H4	Bungay	Desirable	Developer	Unknown	Unknown	Unknown	Unknown	Section 106, Neighbourhood CIL	Unknown	Unknown	Short term		Part of Bungay Neighbourhood Plan
Allotments and community orchard at Brightwell Lakes	SCLP12.19	Martlesham	Desirable	Developer	Unknown	Unknown	Unknown	Unknown	Section 106	Unknown	Unknown	Short - medium term		
Country park on Land South of The Street, Carlton Colville	WLP2.16	Carlton Colville	Desirable	East Suffolk Council	£120,000.00	Unknown	Unknown	£120,000.00	Section 106	£0.00	None	Short-medium term		Delivered with site
Country park on Beccles and Worlingham Garden Neighbourhood	WLP3.1	Worlingham	Desirable	East Suffolk Council	£152,000.00	Unknown	Unknown	£152,000.00	Section 106	£0.00	None	Short-medium term		Delivered with site
Open space provision at South Saxmundham Garden Neighbourhood	SCLP12.29	Saxmundham	Essential	Developer	Unknown	Unknown	Unknown	Unknown	Section 106	Unknown	Unknown	Short – medium term		Delivered with site
Additional burial space at Framlingham Cemetery	FRAM24	Framlingham	Desirable	Developer	Unknown	Unknown	Unknown	Unknown	Neighbourhood CIL	Unknown	Unknown	Over Plan Period		Part of the Framlingham Neighbourhood Plan
Provision of allotments/community garden	SA3	Leiston	Desirable	Developer	Unknown	Unknown	Unknown	Unknown	Section 106, Neighbourhood CIL	Unknown	Unknown	Over Plan Period		Part of Leiston Neighbourhood Plan
Provision of a Multi-Use Games Area on Beccles and Worlingham Garden Neighbourhood) including changing facilities	BECC2	Beccles	Desirable	Developer	Unknown	Unknown	Unknown	Unknown	Section 106, Neighbourhood CIL	Unknown	Unknown	Over Plan Period		Part of Beccles Neighbourhood Plan
Provision of youth space, indoor play, 'green gym, and indoor swimming pool	BECC2	Beccles	Desirable	Developer	Unknown	Unknown	Unknown	Unknown	Section 106, Neighbourhood CIL	Unknown	Unknown	Over Plan Period		Part of Beccles Neighbourhood Plan
Provision of allotments, community orchard and community farm/education facility	MEL10, MEL20	Melton	Desirable	Developer	Unknown	Unknown	Unknown	Unknown	Neighbourhood CIL	Unknown	Unknown	Over Plan Period		Part of Melton Neighbourhood Plan

<b>Total</b>					<b>£1,448,417.00</b>		<b>£1,004,240.00</b>	<b>£444,000.00</b>		<b>£0.00</b>				
<b>Total</b>					<b>Unknown</b>		<b>Unknown</b>	<b>Unknown</b>		<b>Unknown</b>				
<b>Total</b>					<b>Unknown</b>		<b>Unknown</b>	<b>Unknown</b>		<b>Unknown</b>				
<b>Overall Totals</b>					<b>£1,448,417.00</b>		<b>£1,004,240.00</b>	<b>£444,000.00</b>		<b>Unknown</b>				

## Sports and Leisure

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Required Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/ Progress	Status	Comments
Provision of full-sized sand filled football/hockey pitch in Beccles		Beccles	Desirable	East Suffolk Council	£770,154.00	Football Foundation	£695,654.00	£74,500.00	CIL	Unknown	None	Short term		3G football Pitch at Beccles TFC in 18/19 - DCIL funded
Beccles Lido Improvements		Beccles	Desirable	East Suffolk Council	£517,828.00	Various	£442,828.00	£75,000.00	CIL	£0.00	None	Short term		DCIL funding 2019/20
Ufford Recreation Ground Car Park Resurface		Ufford	Desirable	Ufford Parish Council	£28,000.00	Ufford Parish Council	£25,000.00	£3,000.00	CIL	£0.00	None	Short term		DCIL Funding 2018/19
Lowestoft - Royal Green - play equipment and footpath improvements		Lowestoft	Desirable	East Suffolk Council in partnership with Sentinel Leisure Trust and Waveney Norse	£125,000.00	S106 from planning permissions DC/12/1014/FUL, DC/13/0131/FUL, DC/0457/COU.	£1,500.00	£123,500.00	CIL	£0.00	None	Short term		DCIL Funding 2018/19
Halesworth Campus Phase 1		Halesworth	Essential	East Suffolk Council, Suffolk County Council	£3,800,000.00	Sale of land	£2,300,000.00	£1,500,000.00	CIL	£0.00	Sport England, Football Association, National Lottery and other sports associations	Short term		
Relocation, Improvements and an extra pitch at Gunton Park Rugby Club		Corton	Desirable	East Suffolk Council	Unknown	Sale of land	Unknown	Sale of land is expected to cover entire cost	None	Unknown	None	Short term		
Provision of small 3G pitch at Bungay and District Sports Association		Bungay	Desirable	East Suffolk Council	Unknown	None	£0.00	Unknown	CIL	£0.00	None	Short term		
Expand cricket pitches on Southwold Common by 2 wickets		Southwold	Desirable	East Suffolk Council	Unknown	None	£0.00	Unknown	CIL	Unknown	None	Short term		
Improved tennis courts in Lowestoft, Beccles, Ringsfield, Blundeston and Wrentham		Various	Desirable	East Suffolk Council	Unknown	None	£0.00	Unknown	CIL	Unknown	None	Short term		
Improved playing pitches in Halesworth, Reydon, Shadingfield, Ringsfield, Blundeston and Wrentham		Various	Desirable	East Suffolk Council	Unknown	None	£0.00	Unknown	CIL	Unknown	None	Short term		
Playing pitch on Kirkley Waterfront Sustainable Urban Neighbourhood (Policy WLP2.4)	WLP2.4	Lowestoft	Desirable	East Suffolk Council	£250,000.00	Unknown	£250,000.00	£0.00	None	£0.00	None	Short term		
Playing pitches on Land South of Southwold Road, Brampton (Policy WLP7.9)	WLP7.9	Brampton with Stoven	Desirable	East Suffolk Council	£28,750.00	Unknown	£0.00	£28,750.00	Section 106	£0.00	None	Short term		
New Sports provision and associated open space, (totalling 7.9 ha), including changing facilities and toilets, at Brightwell Lakes (SCLP12.19)	SCLP12.19	Martlesham	Desirable	Developer	Unknown	Unknown	Unknown	Unknown	Section 106	Unknown	None	Short term		
Provision of a children's play area (SA1)	SA1	Kessingland	Desirable	Developer	Unknown	None	Unknown	Unknown	S106, Neighbourhood CIL	Unknown	Unknown	Short Term		Part of Kessingland Neighbourhood Plan
Extended Play Field Space at Laurel Farm	SA2	Kessingland	Desirable	Developer	Unknown	None	Unknown	Unknown	S106	Unknown	Unknown	Short Term		Part of Kessingland Neighbourhood Plan
Provision of Neighbourhood Equipped Area for Play	SA3	Kessingland	Desirable	Developer	Unknown	None	Unknown	Unknown	S106, Neighbourhood CIL	Unknown	Unknown	Short Term		Part of Kessingland Neighbourhood Plan
Brightwell Lakes Public Art Scheme	SCLP12.19	Martlesham	Desirable	Developer	£100,000.00	Unknown	Unknown	£100,000.00	Section 106	£0.00	None	Short - medium term		
Halesworth Campus Phase 2		Halesworth	Desirable	East Suffolk Council, Suffolk County Council	£1,750,000 – 2,250,000	None	£0.00	£1,750,000 – 2,250,000	CIL	£0.00	Sport England, Football Association, National Lottery and other sports associations	Short – medium term		

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Required Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/Progress	Status	Comments
Playing pitches on Beccles and Worlingham Garden Neighbourhood	WLP3.1	Beccles	Desirable	East Suffolk Council	£460,000.00	Unknown	£0.00	£460,000.00	Section 106	£0.00	None	Short - medium term		
New leisure centre development at North Felixstowe Garden Neighbourhood	SCLP12.3	Felixstowe	Essential	East Suffolk Council, Developer	Unknown	East Suffolk Council	Unknown	Unknown	Section 106	Unknown	Sport England, Football Association, National Lottery and other sports associations	Short – Medium term		
Enhancement of sports and community facilities at Suffolk Police HQ, Martlesham	SCLP12.25	Martlesham	Essential	Developer	Unknown	Unknown	Unknown	Unknown	Section 106/CIL	Unknown	Sport England, Football Association, National Lottery and other sports associations	Short – Medium term		
Playing pitches on North of Lowestoft Garden Neighbourhood	WLP2.13	Corton	Desirable	East Suffolk Council	Unknown	Unknown	Unknown	Unknown	Section 106	Unknown	None	Medium-long term		
Oakes Farm Development	WLP2.19	Carlton Colville	Essential	East Suffolk Council	£6,273,178.00	Unknown	Unknown	£250,000.00	Section 106	£6,023,178.00	CIL	Unknown		
New changing rooms and improved tennis courts at Normanston park		Lowestoft	Desirable	East Suffolk Council	£200,000.00	Football Foundation	£50,000.00	£150,000.00	CIL	£0.00	None	Unknown		
Provision of 2 Neighbourhood Equipped Areas for Play in Framlingham	FRAM9, FRAM25	Framlingham	Desirable	Developer	Unknown	Unknown	Unknown	Unknown	S106, Neighbourhood CIL	Unknown	Unknown	Over Entire Plan Period		Part of the Framlingham Neighbourhood Plan

<b>Total</b>					<b>£14,174,910-14,674,910</b>		<b>£3,739,982.00</b>	<b>£4,411,750-4,911,750</b>		<b>£6,023,178.00</b>				
<b>Total</b>					<b>£128,000.00</b>		<b>Unknown</b>	<b>Unknown</b>		<b>Unknown</b>				
<b>Total</b>					<b>Unknown</b>		<b>Unknown</b>	<b>Unknown</b>		<b>Unknown</b>				
<b>Overall Totals</b>					<b>£14,302,910-14,802,910</b>		<b>£3,739,982.00</b>	<b>Unknown</b>		<b>Unknown</b>				

## Coastal Protection and Flooding

Project	Local / Neighbourhood Plan Policy	Parish	Priority	Lead Provider	Estimated Cost	Non-Developer Funding Sources	Potential Non-Developer Funding Amount	Required Developer Contribution	Type of Developer Contribution	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/Progress	Status	Comments
Deben Estuary - Renovation of Flood Defence Wall Flood Cell 01 - Preliminary Work		Bawsey	Desirable	The Deben Estuary Partnership	£1,200,000.00	The Deben Estuary Partnership and enabling development	£1,073,800.00	£126,200.00	CIL	£0.00	None	Short term		DCIL Funding 2018/19
Projects listed under the Lowestoft Flood Risk Management Strategy		Lowestoft	Essential	East Suffolk Council	Unknown	Local Enterprise Partnership, Suffolk County Council, DEFRA, Regional Flood and Coastal Committee, National Grant	Unknown	£0.00	CIL	Unknown	None	Short term		Tidal walls construction began in April 2021 to complete in 2023
Flood mitigation at Land South of Carlton Colville (WLP2.16)	WLP2.16	Carlton Colville	Critical	Suffolk County Council	£379,000.00	Unknown	£0.00	£379,000.00	Section 106	£0.00	None	Medium term		To be delivered with site
Increasing flood mitigation measures along the River Orwell and the Port of Felixstowe		Various	Critical	Suffolk County Council, Anglian Water, Environment Agency, Developer	Unknown	Local Enterprise Partnership, Suffolk County Council, DEFRA, Anglian Water, Environment Agency	Unknown	Unknown	CIL	Unknown	Unknown	Over entire plan period		
<b>Total</b>					<b>Unknown</b>		<b>Unknown</b>	<b>£379,000.00</b>		<b>Unknown</b>				
<b>Total</b>					<b>£1,200,000.00</b>		<b>£1,073,800.00</b>	<b>£126,200.00</b>		<b>£0.00</b>				
<b>Total</b>					<b>None</b>		<b>None</b>	<b>None</b>		<b>None</b>				
<b>Overall Totals</b>					<b>£1,200,000.00</b>		<b>£1,073,800.00</b>	<b>£505,200.00</b>		<b>£0.00</b>				

## Keys

### Status

	Completed
	In Progress
	Not Started
	No Longer to be Delivered

### Associated Plan

	Waveney Local Plan
	Suffolk Coastal Local Plan
	Neighbourhood Plan

### Priorities

Critical	Infrastructure needed to unlock development sites (i.e. development cannot take place until this project is delivered)
Essential	Infrastructure necessary to support development and mitigate impacts. Without this the developments' sustainability would be undermined
Desirable	Infrastructure that could support development and make it more sustainable, but development would be sustainable without it

### Timescale/Progress

Short Term	0-5 Years
Medium Term	5-10 Years
Long Term	Over 10 Years
Plan Period	Present Day - 2036



## District CIL Funding 2023-24

### 1. Bids received in 2023

- 1.1 The April/May 2023 bid window saw a total of 17 bids submitted for consideration by the CIL Spending Working Group (CSWG). 4 of the bids had been twin tracked and submitted as both a District CIL (DCIL) bid and Local CIL (LCIL) bid. These were reviewed and processed under the most appropriate approach, through the CSWG.
- 1.2 The Local CIL Fund is the 3% (of DCIL received in the 22/23 financial year) fund retained for smaller, local projects. Applications are for a maximum of £50,000 which must be match funded with Neighbourhood CIL Funding or other funding sources.

### 2. Approved Local CIL(LCIL) Bids

- 2.1 The CSWG may approve Local CIL Fund projects, where they meet the required criteria and are classed as valid bids.
- 2.2 Table 1 below shows the Local CIL Fund bids which have been approved by the CSWG on 27 June 2023:

**Table 1**

Bid Ref	Infrastructure Project	Amount
LCIL 2023-2	Southwold - Klondyke Skate Park	£ 50,000.00
LCIL 2023-3	Beccles - Waveney Meadow Project	£ 22,000.00
LCIL 2023-4	Blundeston - Play Park Refurbishment	£ 25,000.00
LCIL 2023-5	Rendlesham - Skatepark and Nature Walk	£ 50,000.00
<b>Total</b>		<b>£ 147,000.00</b>

### 3. Consideration of the District CIL(DCIL) bids by the CSWG

- 3.1 For the 2023 DCIL bid round, a total of 9 bids were received for District CIL funding which were over the £50,000 LCIL bid threshold.
- 3.2 CSWG make recommendations to Cabinet in relation to the District CIL Bids. Table 2 identifies the total value of District CIL recommended by the CSWG for Cabinet to approve. A summary of each bid considered is included in Table 3 on pages 3-13.

**Table 2**

Summary of Recommended Allocations	
Estimated total cost of delivering all of the projects	£ 19,400,037.77
Total DCIL requested	£ 4,773,761.00
<b>Total DCIL recommended to Cabinet to award as DCIL Fund allocations</b>	<b>£ 3,479,203.00</b>

- 3.3 Detailed information on each of the District CIL bids received, the benefits of the project and how they relate to corporate objectives and the two Local Plans, together with the recommendations put to Cabinet by CSWG, is provided within pages 3-13 of this document.
- 3.4 A project providing community meeting facilities has a recommendation to refuse on the grounds of prematurity.
- 3.5 One of the projects submitted paperwork outside of the correct bid application process. This was in relation to a project which was not in the Infrastructure Funding Statement (Infrastructure List) but was located within an education setting and affected the use of education buildings and land. The bid was rejected as not valid by the CSWG as it did not meet the basic submission criteria and was not directly related to planned growth. Whilst benefits of providing the project meet with the wider strategic aims for football club provision, the increase in community benefits and links to planned growth, required for District CIL to fund were not clearly defined. Should the project be supported by Suffolk County Council, and therefore it was confirmed as not negatively affecting education land and education provision and be shown to be appropriately deliverable, with planning permission and other funding secured, then the project could reapply for the Local CIL Fund in April 2024.
- 3.6 It is understood that guidance for applying for funding for education establishments (all schools, including foundation schools and academies) will be issued by Suffolk County Council in the near future.

## Summary of District CIL Bids Received 2023 and Recommendations Made

**Table 3**

<b>Lowestoft – Barnards Soccer Centre Improvements</b>					
Ref	Lead Party	Project Cost	DCIL Requested	Other Funding	Recommendation
DCIL 1-2023	Suffolk Football Association	£374,400	£101,500 (27.1% DCIL of project costs)	£272,900 (£60k secured)	<b>CSWG recommended to approve subject to conditions.</b>
<p><b>Benefits of the Project:</b></p> <p>Barnards Soccer Centre is an existing sporting facility serving Lowestoft and the surrounding communities. The site is owned by Suffolk County Council and leased to the Suffolk Football Association (a registered charity). The facility includes a classroom used to train local football officials, such as referees and linesmen.</p> <p>The proposal seeks to ensure the long-term provision of the 11v11 Floodlit 3G Pitch, with replacement of the current 3G AGP surface, and replacement of current non sustainable Floodlight provision for modern energy efficient lighting.</p> <p>Without significant investment into both the inefficient floodlights and the 3G surface, which has reached the end of its useful life, the centre will close. This would be a substantial loss to 2 local grassroots clubs compromising from Under 6's to first teams, as well as students at the further education sports college. By regenerating the facility, the Football Association want to provide additional sessions. Some of these examples are Walking Football for older ages, refugee support sessions, disability inclusion Pan Disability, girls football sessions such as 'Wildcats' and Squad' for varying age ranges. Potential opportunities are also being explored regarding day release alternative education provision in and around the Special Educational Needs and Pupil Referral Unit departments where this site could facilitate some educational provision.</p> <p>This project will ensure the local community benefits from the facility and not just the traditional footballing offer. Securing the future of this facility would provide additionality in the offer available to diverse groups within the community.</p>					
<p><b>Notes/Key Points:</b></p> <p><b>VALID BID – subject to finalised costs and planning permission (if required)</b></p> <ul style="list-style-type: none"> <li>The project is not listed in the Infrastructure Funding Statement 21-22 (IFS) but is detailed in the emerging Lowestoft Local Plan Policy LOW15: identified as a facility to be protected with improvement of facilities being supported. The project is also listed within the ESC Sports and Leisure Strategy as a priority to secure the future of the site against the risks of losing the community provision. The Barnards site is listed within the Football Foundations East Suffolk Local Football Facility Plan for future expansion. The project is in the IFS for 2022-23 which is due to be published by 31 December 2023.</li> </ul>					

- The project directly relates to two Strategic Plan objectives; the **Communities objective of *Maximising health and well-being*** and also the **Economy objective to *support and deliver infrastructure***.
- This is a collaboratively funded Project with the amount of DCIL requested being 27.1% of project costs.
- The proposal meets the requirements of ‘Beneficial Infrastructure’ in line with the CIL Spending Strategy.
- Maintaining and enhancing this site is a key delivery target for ESC Leisure and the project has been allocated other ESC funding some time ago.

### Foxhall Household Waste and Recycling Centre Improvements

Ref	Lead Party	Project Cost	DCIL Requested	Other Funding	Recommendation
DCIL 3-2023	Suffolk County Council Waste Services	£7,848,355	£164,500 (12.22 % of project costs)	£7,683,855 (secured - including 2021 DCIL award of £794,414 )	<b>Approve</b>

#### Benefits of the Project:

The current Foxhall Recycling Centre serves a large area of the East Suffolk population and is already in need of re-development in order to stay in place as it is operating at capacity. This project aims to expand and improve the Recycling Centre providing a faster throughput, more efficient service, increased safety for the public users and enhancing the recycling and reuse service provision. The project has commenced and will soon reach the final Phase 3 Stage as an approved SCC Capital project.

This is a second DCIL bid to assist with addressing the funding gap as a result of significant cost increases.

#### Notes/Key Points:

##### VALID BID

- This project is detailed in the Local Plan and in the IFS as a planned short term ‘Essential’ project to support housing growth. The amount of developer contributions expected as funding towards the project is £1,000,000.
- The project is detailed within the Suffolk Coastal Local Plan (page 476) and is in the Infrastructure List of the IFS as an essential short-term project (page 103).
- The original estimated contribution from CIL within the 2020 Suffolk Coastal Local Plan is £1,000,000. The cumulative amount of the 2021 award and this second bid would be £958,914.

- The project directly relates to the Strategic Plan **Environment objective** of *minimising waste, reusing materials, and increasing recycling*; reduced refuse volumes and increased recycling rates and also the **Economy objective** to *support and deliver infrastructure*.
- SCC confirm in their application that the project will deliver household waste recycling service to the catchment until 2043.

### Bungay Medical Practice extension, reconfiguration, and enhancement

Ref	Lead Parties	Project Cost	DCIL Requested	Other Funding	Recommendation
DCIL 4-2023	Integrated Care Board (ICB) / Bungay Medical Practice	£1,524,000	£1,283,000 (84% of project costs)	£241,000 VAT reclaim (20%, as appropriate and excluding fees)	<b>Approve subject to conditions</b>

#### Benefits of the Project:

The practice plans to reconfigure the ground floor (together with an extension to the front elevation) to improve reception functionality and privacy by reducing congestion within the waiting area and to provide more accessible clinical space on the ground floor.

These changes will ensure there is sufficient clinical capacity to deliver services for the local population, including the clinical expansion planned by South Waveney Primary Care Network (PCN). The ICB has modelled future demand/capacity for a period of 11-15 years.

The project aims to deliver the following benefits:

- Improved patient access – including capacity to resolve existing constraints and meet new registration demand.
- Improved recruitment and retention of healthcare staff through ensuring appropriate facilities are available to support them in delivering care and increase training opportunities for medical and clinical placements. Specifically, extending the practice’s teaching capacity for medical students, foundation doctors and specialty trainees.
- Provide a range of extended primary care services for the local population.
- Support to the South Waveney PCN in providing new models of care through ensuring the practice has capacity and appropriate facilities.
- Support to the South Waveney healthcare system and integrated care approaches through sustaining and strengthening the practice’s ability to work with and host providers of other services.

The project will provide approximately 115m<sup>2</sup> of new Gross Internal Area (GIA) including 3x16m<sup>2</sup> (net) clinical rooms, additional waiting space and changing facility, plus additional circulation, and is due to be commenced in 2024.

**Notes/Key Points:**

**VALID BID – subject to conditions (finalised costs, NHS Governance approval and planning permission)**

**84% DCIL contribution requested (with the remaining 16% relating to the VAT reclaim (on related costs only))**

- The project directly relates to the Strategic Plan **Enabling Our Communities objective** of *Maximising health, well-being, and safety in our District* and also the **Economy objective** to *support and deliver infrastructure*.
- This is a planned essential infrastructure project within the Waveney Local Plan which is expected to be funded from CIL contributions (page 123). It is recorded 2022-23 Infrastructure Funding Statement, due to be published by 31 December 2023.
- The Integrated Care Board support the Bid and confirm the improvement project will deliver health and care services from the practice to cover planned growth for the next 11-15 years.

### Bungay Town Football Club new 3G pitch

Ref	Lead Parties	Project Cost	DCIL Requested	Other Funding	Recommendation
DCIL 6-2023	The Bungay & District Sports Association Ltd	£1,317,127	£547,803 (41.59% of project cost)	£769,324 (£20,000 secured)	<b>Approve subject to conditions.</b>

**Benefits of the Project:**

The proposal seeks to provide a new 3G surface for Bungay Town Football Club based at the Bungay & District Sports Association. The existing facilities are shared by the football, cricket, and tennis clubs, along with a community clubhouse facility and small women only gym on site.

The new 3G playing area is to be suitably sized for U16s and younger, to facilitate all weather play, including through spells of drought and wet weather, as well as greater hours of use during darker months. The proposal would serve for the current 23 football teams for both girls and boys from age 6 upwards, alongside other users of the facilities including Bungay High School, community summer soccer school coaching sessions, and to work with and facilitate sports provision for disabled users.

**Notes/Key Points:**

**VALID BID – subject to conditions (finalised costs, Community User Agreement and planning permission)**

- This project is detailed in the IFS as a planned short term ‘Desirable’ project to support housing growth (page 116). Bungay Neighbourhood Plan also supports the proposal in policy CM3 in relation to enhancement of existing sporting facilities (page 33).
- The proposal is supported by the Suffolk FA and the need for the youth sized surface identified in the Local Football Facility Plan and ESC Playing pitch and outdoor sports strategy.
- The project directly relates to two Strategic Plan objectives; the **Communities objective of Maximising health and well-being** and also the **Economy objective to support and deliver infrastructure**.
- This would provide an enhancement to the overall facilities of the established Bungay and District Sports Association and increase the availability of outdoor active recreation for children in the area.

### Melton Early Years Provision

Ref	Lead Parties	Project Cost	DCIL Requested	Other Funding	Recommendation
DCIL 7-2023	Suffolk County Council Education	£1,350,000	£1,350,000 (100% DCIL requested)	No other sources of funding	<b>Approve subject to conditions</b>

#### Benefits of the Project:

The Primary School currently operates a small Early Years provision within the existing school building. The proposal seeks to provide a bespoke purpose built EYs facility within the primary school grounds, to provide 30 FTE EYS spaces for wrap around and school time care.

The proposal is at early development stage but would provide a class room/activity space for up to 30 children at one time, pupil WCs and staff office space. The design is based on the new EYs facility currently being delivered at Holton St Peters Primary School.

The provision of EYs places will benefit the community as children who attend high quality early years provision are better able to achieve their full potential. The care provided also enables local families to remain and enter the workplace, and national Government intends to increase funded childcare for families, so there must be consideration of provision to accommodate this.

#### Notes/Key Points:

**Valid Bid - subject to conditions (planning approval, evidence of ongoing verification of costs (RIBA Stages), schools commissioner approval to expand, payment release in two stages)**

- Additional early education capacity within Woodbridge Ward is detailed as an ‘Essential’ short-medium term project within the IFS (page 64). Suffolk County Council have confirmed that this proposal in Melton would meet this need.

- The East Suffolk Coastal Local Plan references the need for Primary provision in the Woodbridge, Melton and Bredfield area (page 486). By providing a new bespoke space for the existing Early Years provision, this would return existing space for primary children in Melton/Woodbridge.
- The project directly relates to the Strategic Plan **Economy objective** to **Support and deliver infrastructure**, enabling children to access early years education and to improve their outcomes and to support working parents.
- Demand for EY places from development is considered to be 28 required places. This project will deliver an additional 30 full time equivalent early years places for children from the age of 3 at Melton Primary School.
- Given the early stages of costing for the project, it is recommended to pay £1,000,000 upon compliance with conditions of an award and make a further payment to the value of £350,000 on submission of final costs evidence.

### Halesworth Campus Phase 1 Project

Ref	Lead Parties	Project Cost	DCIL Requested	Other Funding	Recommendation
DCIL 8-2023	Halesworth Campus Trust	£4,413,066	£914,558	Costs and Funding require further clarity	<p><b>Refuse bid as invalid and premature</b></p> <p><b>*£1,641,997 DCIL awarded in 2021. Both combined would represent 57.93% DCIL contribution to Phase 1 project</b></p>

#### Benefits of the Project:

The Campus sports and recreation facilities sit in a broader area known as 'Halesworth and Holton Healthy Neighbourhood', which is an allocated development site in the Waveney District Council Local Plan (2019). Policy WLP4.1 the proposal to redevelop the former Halesworth Middle School site.

The Phase 1 Halesworth Campus proposal seeks to deliver 3G and grass pitches along with associated infrastructure. The project benefitted from a DCIL award in 2021 and appears to have commenced, although not all conditions for draw down of the existing award have been met to date.

This is a second bid submitted due to increased costs and non-allocation of full proceeds of the land sale to this project.

#### Notes/Key Points:

**It has not been possible to justify the amount requested or the timing of the bid.**

## Current bid seeks 20.72% DCIL contribution to costs

## Cumulative contribution of DCIL would be 57.93% of project costs

- The project is detailed as a planned short term 'Essential' project to support housing growth in the Waveney Local Plan and IFS (page 151). The amount of developer contributions expected as funding towards the project is £1,500,000. A previous DCIL award in excess of this was granted in 2021.
- The project directly relates to the two Strategic Plan **Economy objective** to *Support and deliver infrastructure* and the **Communities objective** of *Maximising health, well-being and safety in our District*.
- The project has already benefited from a 2021 DCIL award of £1,641,997, awarded in September 2021.
- This bid application relates to the first phase of a development for new sports and recreation facilities to Halesworth and surrounding parishes. The first phase of construction is now identified to cost £4,413,066 (increased from the 2021 projection of £3,530,397). The project is currently part funded from the sale of land to Castle Meadow Care to the value of £1,121,000 (from the first instalment).
- Of the conditions of this 2021 DCIL award, planning permission has now been approved for the Phase 1 development, but evidence of ongoing cost already incurred, and a Community Use Agreement have not yet been fully met.
- It is unclear why the second instalment from the enabling land sale is not being allocated to this phase of the project as was identified to be the funding approach within the IFS. This would provide a further £700,000. These proceeds are due to be received in July 2024, 12 months after the first instalment, which has already been received in June 2023.
- A successful second bid award would take the proportion of CIL funding for the Phase 1 Campus project to 57.93%, with no other funding application to sporting bodies made, however it is unclear what other grant funding has already been achieved as although reference has been made to this type of funding in correspondence, no details have yet been provided.
- A number of facts and figures in relation to the latest CIL bid application are needing to be clarified at this point in time and the amount requested is unable to be justified from examination of available data.

## Bungay Library Extension

Ref	Lead Parties	Project Cost	DCIL Requested	Other Funding	Recommendation
DCIL 9-2023	Suffolk County Council Library Services	£154,800	£32,400 (20.93% of project cost)	£122,400 (£106,400 secured including VAT reclaim)	<b>Approve subject to conditions</b>

### Benefits of the Project:

The Proposal seeks to alter and extend the lobby area of Bungay Library, providing a buggy park externally and new storage area to release existing library space. The alterations would increase accessibility for users, make the facility DDA compliant, and facilitate the use of the library as a community hub.

### Notes/Key Points:

**VALID BID – subject to conditions (confirmation of funding details, no further CIL bids for project)**

- The project directly relates to the two Strategic Plan **Economy objective** to *Support and deliver infrastructure*, and the **Communities objective** of *Maximising health and well-being*.
- The project is detailed within the Waveney Local Plan (page 298), as well as within the IFS as a desirable short to medium term project (page 100). The recently 'made' Bungay Neighbourhood Plan also highlights improvements to the library as a priority and the use as a community hub (pages 30 and 35).
- Planning permission for the project has been granted and collaborative funding secured.
- The IFS identifies an anticipated contribution of £104,760 for the project, and SCC Libraries have confirmed that there would be no further projects at the library requiring CIL funding, within the current Local Plan period.

## Oulton Broad - Benjamin Britten Academy 3G Pitch

Ref	Lead Parties	Project Cost	DCIL Requested	Other Funding	Recommendation
DCIL 10-2023	Benjamin Britten Academy	£918,289.77	£100,000 (10.89% of project costs)	£805,000 (£205,000 secured)	<b>CSWG rejected as an invalid bid.</b>

### Benefits of the Project:

The proposal is to provide a full size 3G pitch with floodlighting, an all-weather sports pitch which would be suitable to be used for training, activity programmes and match play. The anticipated majority users would be the school pupils and Waveney Football Club, with the remainder of the available time being open for other community groups.

### Notes/Key Points:

**INVALID BID – The application was not submitted via Suffolk County Council Education and is not a planned project to support Local Plan growth, as required within the CIL Spending Strategy and has been rejected as invalid by the CSWG.**

- The bid had not been submitted following correct process as set out within the CIL Spending Strategy. As the project delivers just short of 60% of total usage for the school for education use the bid must be supported by and should be submitted via Suffolk County Council as the landowner and lead statutory Body for Education in Suffolk, despite the schools Academy status.
- The project is not a planned Education or Sports and Leisure project within the East Suffolk Infrastructure Funding Statement (Infrastructure list), and the project has not demonstrated that it offers increased community benefit and links to planned growth.
- For education projects, Community Infrastructure Levy (CIL) is used to deliver school expansions to mitigate increases in pupil numbers, as a result of (commenced) new developments in the catchment area.
- For Leisure and Sports facilities the project has not specifically been identified as being required to support planned growth.
- The project features in the Football Foundations East Suffolk football facility plan as one of 3 options being considered to service Waveney FC, which is the largest club in the County with 56 teams.

[East Suffolk Local Football Facility Plan \(footballfoundation.org.uk\)](http://footballfoundation.org.uk)

## Framlingham Scout and Guide HQ and Community Hall

Ref	Lead Parties	Project Cost	DCIL Requested	Other Funding	Recommendation
DCIL 12-2023	Framlingham Scout and Guide Group	£1,500,000	£280,000 (18.67% of project cost)	£1,220,000 (£0 secured)	<b>Refuse bid on grounds of prematurity</b>

### Benefits of the Project:

The proposal seeks to provide a new site and relocate to a new facility for the Framlingham Scout and Guide HQ. As part of the funding package to deliver the project the intention is to sell the current headquarters in Badingham Rd, Framlingham for residential development which will provide a small development of additional new homes adjoining the recent Mills Trust New Alms Houses located behind the existing headquarters.

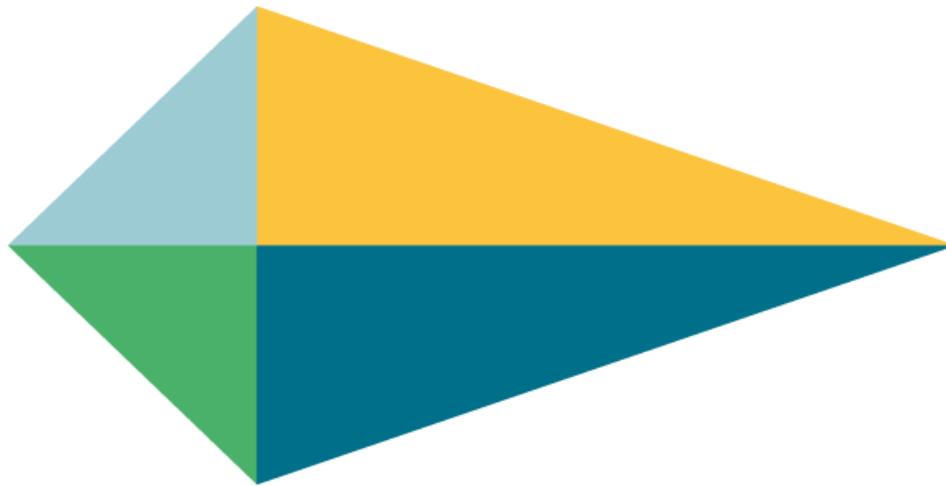
The relocation and provision would include the purchase of new land, one large hall with capacity for over 200 people theatre style, and a secondary hall, allowing two units to meet at the same time, and a smaller quiet room. Facilities would also include a modern and spacious kitchen, improved toilets and showers, ample storage and improved outdoor parking and amenity space.

### Notes/Key Points:

#### **Bid rejected by CSWG on grounds of prematurity.**

- The project directly relates to the two Strategic Plan **Economy objective to *Support and deliver infrastructure***, and the **Communities objective of *Maximising health and well-being***
- The project is not detailed within the Suffolk Local Plan or Infrastructure Funding Statement (Infrastructure list) but would meet the criteria of 'beneficial' as detailed within the Spending Strategy.
- It is supported by the Town Council as delivering on Neighbourhood Plan objective of a new community useable space for up to 200 people although no Neighbourhood CIL (NCIL) funding commitment has yet been made. The recently delivered Castle Community Rooms project in Framlingham, which was jointly CIL funded with Framlingham Town Council, has provided a useable community space for up to 120 people.
- The grant of planning permission in relation to both sites is vital to deliver the scheme, along with substantial additional funding sources.
- The CSWG have recommended to reject bid on basis of prematurity and noted that they would reconsider a newly submitted bid when planning permission has been granted for both sites, confirmation has been received that this completes the Neighbourhood Plan priority for Community Facilities for the Framlingham Neighbourhood Plan area and a suitable contribution of NCIL is secured towards the project.

# Community Infrastructure (CIL) Spending Strategy <sup>ES/1637</sup>



**EASTSUFFOLK**  
C O U N C I L

***“the right infrastructure, in the right place, at the right time”***

V8 – 5.09.2023

Major Sites and Infrastructure Team

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## 1. Background

- 1.1 The Community Infrastructure Levy (CIL) was adopted in the former Waveney District area on 1st August 2013 and in the former Suffolk Coastal District area on 13 July 2015.
- 1.2 East Suffolk have reviewed their CIL Rates and a new East Suffolk CIL Charging Schedule has been through Examination, adopted by the Council and was implemented with effect from 1 August 2023.
- 1.3 It important to note that whilst the District CIL fund can be collecting £millions, it can take just a couple of large infrastructure projects, such as expansion of Health or Education provision to empty the funding pot. Spending of District CIL needs to be planned for a number of reasons, namely that the right infrastructure is delivered in the right place at the right time.
- 1.4 CIL is paid on commencement of planning permissions that are CIL liable development, where exemptions or relief from CIL has not been granted. Payments are usually made in instalments and can take up to 2 years to be received in full. Once received the CIL payments are automatically split down into their statutory “pots” or funds: 5% Admin; 15%\* or 25% to parish councils and the remainder to the District CIL Fund. \*Where town or parish councils do not have a made Neighbourhood Plan the 15% is capped at £100 (indexed) per council tax dwelling.
- 1.5 Under the CIL Regulations, the Neighbourhood CIL is passed to the town and parish councils every 6 months; 28 April and 28 October. Only Neighbourhood CIL amounts received in the previous 6 months can be passed on, so areas where there is no new development commencing and thus paying CIL will not receive any Neighbourhood CIL. Parish councils have 5 years from the date of receipt to spend the Neighbourhood CIL. Where there is not a parish council then the funds are held and spent in consultation with the community and under the same terms as the town and parish councils spend.
- 1.6 Currently 21 Neighbourhood Plans have been made which allows these parish councils to receive 25% Neighbourhood CIL from planning permissions that are granted on or after the “made” date. There are a further 22 Neighbourhood Plans in progress with one of currently at referendum stage. This will mean that the amount of CIL passed to parish councils for local infrastructure projects will increase considerably over the plan period. This is excellent news in terms of there being funds passed direct to parish councils for them to deliver their priority projects in their areas, however it does have an impact on the level of District CIL available to deliver larger critical and essential infrastructure projects such as school extensions and extensions to GP services.
- 1.7 Since CIL has been adopted in East Suffolk, approximately £5.6m has been passed to parish and town councils through Neighbourhood CIL Payments. There is greater flexibility for parish councils spending in the CIL Regulations, although any unspent Neighbourhood CIL still held after 5 years from the allocation date must be returned to East Suffolk. Under the CIL Regulations East Suffolk would then spend this CIL to support

the new development in the area of the local council(s).

- 1.8 Parish councils can choose to fund projects collaboratively where local infrastructure priorities are shared with East Suffolk, other parish councils or other infrastructure providers, such as Health, Police, Highways or Education. The CIL Regulations state that parish councils can spend their Neighbourhood CIL on:-
- (a) the provision, improvement, replacement, operation or maintenance of infrastructure; or
  - (b) anything else that is concerned with addressing the demands that development places on an area.
- 1.9 Discussions have commenced to explore how the Council may enable a collaborative funding approach within the Community Partnerships. This would enable more to be achieved with Neighbourhood CIL, together with other grants and funding mechanisms and could address local infrastructure needs which are not confined to parish boundaries.
- 1.10 Where town and parish councils have a Neighbourhood Plan made in their area, the expectation is that Neighbourhood CIL is prioritised and spent to deliver the projects identified in the Neighbourhood Plan. This may mean that in some areas where the Neighbourhood Plan has identified health or education, or other strategic infrastructure as a priority infrastructure requirement, there will be the opportunity to collaboratively fund projects of this nature.
- 1.11 For those town and parish councils receiving 15% Neighbourhood CIL, they should consider the infrastructure needs of their area using a Parish Infrastructure Investment Plan (PIIP) to help understand, evidence and prioritise their infrastructure needs and to focus Neighbourhood CIL spend.
- 1.12 CIL expenditure processes have been under regular review since changes in the CIL Regulations that affect CIL collection, spending and reporting came into effect from 1 September 2019. The Planning Practice Guidance on the GOV.UK website have also been updated to further explain how CIL should be managed under the new CIL Regulations.
- 1.13 The CIL Spending Strategy aims to put in place processes and controls to ensure the effective management and transparency around reporting on CIL, and all developer contributions. The previous CIL spending process related to the formative years for CIL and was an open opportunity to fund local projects, especially during a period where not much Neighbourhood CIL had yet been paid out to town and parish councils. The recent establishment of the Local CIL Fund is a new approach to funding smaller infrastructure projects collaboratively, without putting at risk the delivery of essential infrastructure.

- 1.14 To date East Suffolk has formally allocated over £10.6m of District CIL to a variety of local infrastructure projects across the two former district areas. The list of projects that have been allocated District CIL is reported at the start of the Infrastructure Funding Statement, together with information on their progress.

## **2. The CIL Expenditure Review (background to developing this strategy in 2019)**

- 2.1 CIL should be viewed as a method to mitigate and support growth and therefore its collection and spending is linked to a plan-led approach.
- 2.2 The CIL expenditure review began by looking at the revised CIL legislation and the emphasis placed within the National Planning Policy Framework (NPPF) and the updated Planning Practice Guidance. There is a golden thread linking the requirements for how CIL can and should be spent with the critical and essential infrastructure identified within the local plan infrastructure delivery frameworks.
- 2.3 The review summarises the requirements within **Appendix A** and details the actions linked to these requirements. Below are the points learned from the existing approach and from the review of the latest legislative requirements:
- a) District CIL is different to Neighbourhood CIL: Firstly, it must be focussed on those critical and essential projects identified in the Infrastructure Delivery Frameworks attached to the Local Plans. If we do not do this the risk is that the development coming forward will not be sustainable in planning terms. Secondly, there is no spending deadline for District CIL and it may take a number of years to collect enough funds for projects as they come forward if they come forward ahead of the growth. The key element to support delivery of timely infrastructure is monitoring commencements and sharing data with infrastructure providers. This is the start of the conversation, once infrastructure needs are identified as part of the local plan, neighbourhood plan and through the planning permission process.
  - b) The recent changes in the CIL Regulations, supported by the NPPF and Planning Practice Guidance emphasise the need to spend developer contributions (CIL and s106) to ensure that development is **sustainable in planning terms**. There is now a legislative requirement for the Council to produce and publish an Annual Infrastructure Funding Statement which details those projects which the Council is collecting District CIL towards and planning to deliver in the short term, together with details of the expenditure for the financial year in relation to both s106 and CIL. The first Annual Infrastructure Statement must be published by 31 December 2020.
  - c) Previously CIL was collected and spent in line with Regulation 123 Lists; a list of generic infrastructure types. Some CIL charging authorities took this list a step further through the identification of specific projects to be funded by CIL. The new CIL Regulations remove Regulation 123 and the infrastructure lists which detailed the types of infrastructure which CIL would support and requires all

councils in receipt of any kind of developer contribution to record and report on these in a particular way. The Infrastructure Funding Statement places a greater emphasis towards the projects identified from the growth detailed in the Local Plan, which then feed into the Infrastructure Funding Statement. This ultimately means a greater focus on working with statutory infrastructure providers to work up the projects needed to deliver the critical, essential, and desirable infrastructure indicated through the Local Plan, Neighbourhood Plans and also identified through planning applications. Meetings are held at least quarterly with those responsible for providing the statutory infrastructure, such as with the Integrated Care Board for Health and Suffolk County Council for Education, Highways, Transport and Waste, and Suffolk Police.

- d) At the time of review the Council had formally allocated approximately 35% of the District CIL Pot to local projects, many of which are not identified in the infrastructure Delivery Frameworks of the Waveney Local Plan and the emerging Suffolk Coastal Local Plan and to continue to spend District CIL in this manner would put at risk the delivery of critical and essential infrastructure identified in the Local plan as essential to support new development.
- e) The emerging East Suffolk draft business/strategic plan refers to “evidence led spending of CIL to support growth”. Local plan and Neighbourhood Plan projects are evidence led, but those projects that sit outside of this must be able to demonstrate their link to supporting the sustainability of the Local Plan development.
- f) Where projects have been offered District CIL Funding, many of these have not been “oven ready” schemes and therefore this can tie up District CIL that otherwise could be allocated to critical or essential infrastructure projects that may be delivered in a quicker timeframe and have more urgent and evidenced need.
- g) In the past, District CIL has been allocated to fund feasibility costs of proposed infrastructure. A feasibility study may not always identify a desirable and affordable solution and thus deliver infrastructure. These costs should therefore only form part of a project cost where the project is oven ready and deliverable. The criteria for validating and prioritising District CIL Spending should consider this.
- h) The new CIL Spending Strategy must prioritise and safeguard District CIL for recognised infrastructure to support growth. There is a risk that the past practice of funding local projects diminishes the projected funds and would leave developments without necessary infrastructure.
- i) Some of the historic projects we have allocated District CIL Funds to are not progressing and have not yet been delivered. This means funding is tied up that could otherwise be allocated to a project that is deliverable, is included in the

infrastructure delivery framework and will directly support the new housing developments in the area.

- j) The allocation of CIL to infrastructure projects is not about ‘even geographical share’ but must be proportionate in the way that infrastructure projects are funded where new housing and retail growth has commenced in areas and infrastructure needs have been identified in the Local Plan, Neighbourhood plan and through the planning process.
- k) The new CIL Spending Strategy must prioritise the allocation of District CIL funds to infrastructure projects that will make development within the local plan sustainable in planning terms and be deliverable in the short term. Prioritisation will ensure projects are deliverable in the short term (i.e., “oven ready” or “demonstrably deliverable”) and are ready to be included on the annual Infrastructure Funding Statement (a new requirement of the CIL Regulations). This would mean projects are worked up, fully costed, and have the necessary planning permissions in place before they reach the point of approval for District CIL funding.
- l) At the time of review, East Suffolk had allocated just short of £4m NCIL funds to town and parish councils since April 2016. By ensuring the District CIL is spent as intended, to make development sustainable where developments have commenced in an area, this encourages town and parish councils to look at their local infrastructure needs and to plan delivery of local projects using their Neighbourhood CIL to maximise/benefit from other funding streams such as grants, local funding, and crowd funding. It should be noted that the CIL Regulations give town and parish councils 5 years from the date of receipt in which to spend Neighbourhood CIL.
- m) The new CIL Regulations place new demands in relation to recording developer contributions and reporting on both s106 and CIL. As a result of this, and to meet the Councils business aims of providing information and services more digitally, we need to procure, implement, and deliver a digital solution in order to be an efficient and effective service and to meet the new statutory requirements.
- n) The digital solution for managing developer contributions will enable the council to safeguard District CIL Funds towards projects identified in the Infrastructure Funding Statement as priority projects for the short term. The allocation of funds in this way will require periodic review and annual reporting on the “approved projects” that will be the focus of the Infrastructure Funding Statement. In this way the public, developers, infrastructure providers, local councils and other key stakeholders will be able to understand the infrastructure that is being delivered through developer contributions. The system publicly presents the amount of unspent or uncommitted CIL that the Council holds. It is important to recognise that large infrastructure projects will require CIL to be built up over a period of time and the Council is not unnecessarily “holding onto CIL”.

### 3. The new CIL spending process

- 3.1 District CIL spend will need to initially focus on the critical and essential infrastructure already identified through the local plan and communicated within the planning process. The spending process ensures that District CIL Funding is secured or ringfenced to deliver these projects in a timely manner. **Diagram 1** indicates the cyclical nature of this review process through to when a project is detailed as ‘funded’ in the Infrastructure Funding Statement and then delivered.
- 3.2 The CIL Spending process will ensure that the priority projects for District CIL funding are identified and communicated within the Infrastructure Funding Statement, which is now a new requirement under the updated CIL Regulations 2010 (as amended).
- 3.3 The first Infrastructure Funding Statement was produced and published by 31 December 2020. Towards the end of each year a new Infrastructure Funding Statement is published.
- 3.4 **Diagram 1** shows the cyclical nature of funding and delivering infrastructure that is required through the Local Plan only. **Diagram 2** depicts the process we would expect all projects seeking District CIL to follow.

**Diagram 1**

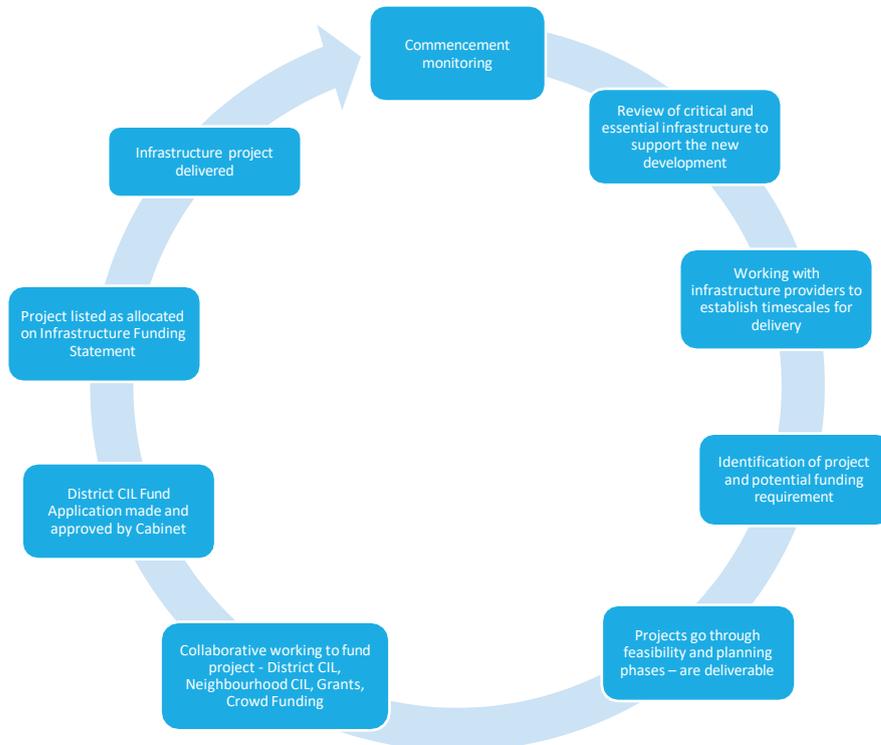
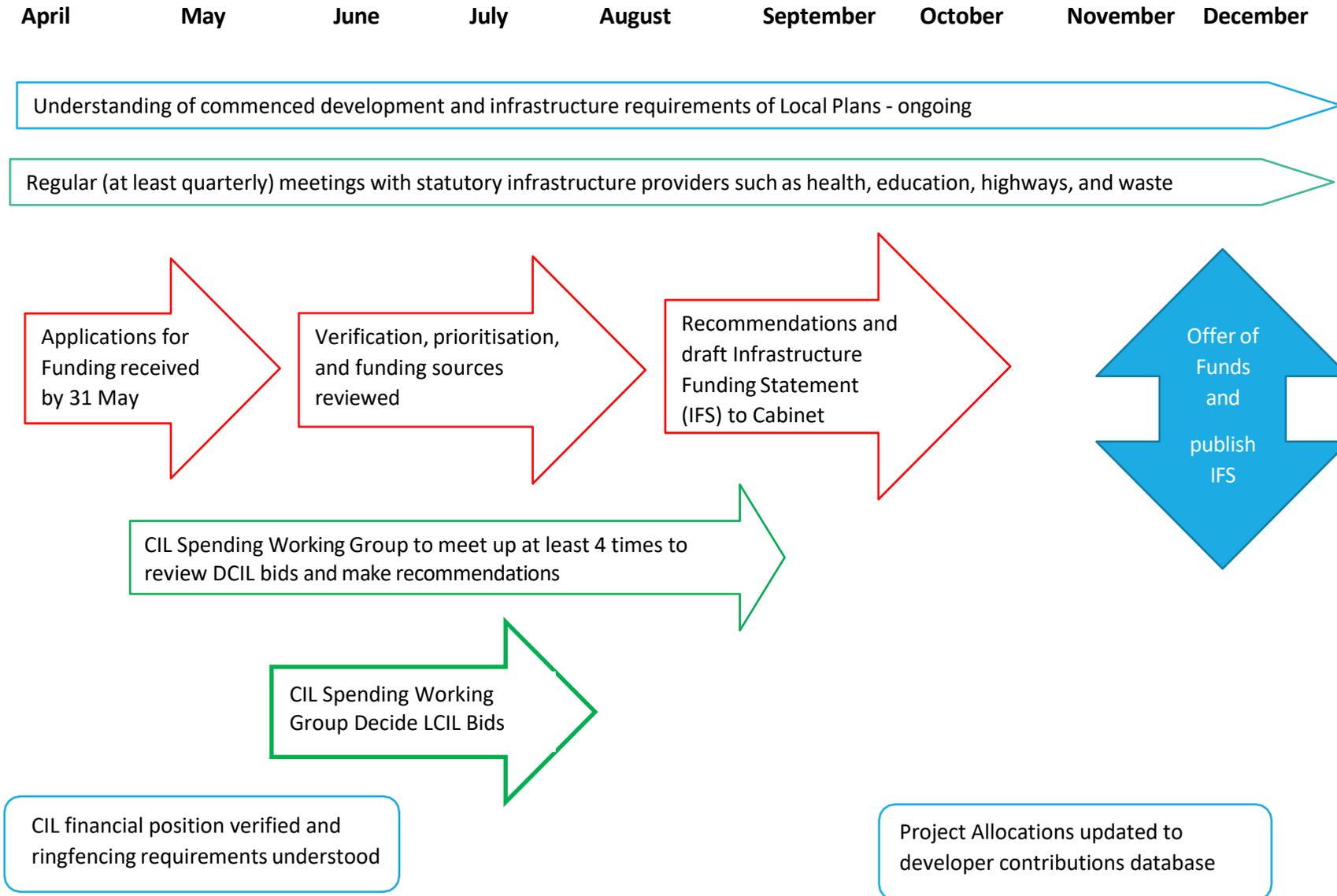


Diagram 2



## 4. Principles of District CIL Allocations

4.1 There are a few key principles to bear in mind when considering applying for funding from District CIL. **In all cases to be considered favorably:**

- a) The infrastructure supports new housing and/or employment growth;
- b) Timeliness (has the new housing the infrastructure is required to make sustainable commenced?);
- c) The benefits of the infrastructure are clear;
- d) The infrastructure is capable of being used by the wider community;
- e) The infrastructure proposed represents value for money;
- f) The infrastructure should be new or if being enhanced there must be some additionality in what facilities and/or services are being provided;
- g) Deliverability can be demonstrated (e.g. feasibility has been completed and planning permission granted);
- h) For local projects, the project has community support demonstrated through evidence of meaningful engagement;
- i) Feasibility studies will only be funded when they form part of a fully costed project that has planning permission in place and is ready to be immediately delivered – feasibility studies alone do not produce infrastructure;
- j) Where the infrastructure is provided by a statutory partner, they agree the project is required and have the project tabled into their delivery plans;
- k) District CIL Funds are applied for by the infrastructure provider where this is delivered by or through a statutory partner such as Highways, Education, Health or Police;
- l) A business case\* is provided where funding over £50k is sought;
- m) A suitable package of measures has been identified which allow for funding of ongoing maintenance of the infrastructure in order to secure continued use;
- n) The timing of delivery of the project is clear and payment stages are defined;
- o) Costings must be clearly defined, and evidence based (3 quotes or quantity surveyors costings provided as applicable);
- p) Where VAT can be claimed back this should be clear and discounted from costings;
- q) All avenues for collaborative spend have been explored – e.g. grants, other government funding (locality monies, LEP, County Council, District, Parish), Neighbourhood CIL, community fundraising, retail shop match funding and crowd funding;
- r) There is certainty around other funding sources;
- s) By releasing District CIL funding we can achieve infrastructure provision through collaborative spend (i.e. other grant funding, Community Partnership and locality funding, LEP/Government funding, Neighbourhood CIL, Crowd Funding/Donations);

- t) State Subsidy considerations do not inhibit the funding (projects where public funding is in excess of £315k or the relevant threshold) where applicable;
- u) Affordability from District CIL funds (all essential and critical infrastructure needs are currently met by the CIL received from commenced developments);

\*In the case of statutory providers, such as Health, SCC Highways, SCC Education, etc – the Project Information Document should be provided

### **Support for £0 CIL Rated Strategic Sites**

- 4.2 In areas where there is significant growth from strategic sites and these sites are Zero Rated for CIL, East Suffolk will work with the affected town and parish councils to understand infrastructure needs and priorities and help them to access District CIL for relevant priority projects.
- 4.3 As is the case already, where local priorities have been identified and Neighbourhood CIL has been received in the area, Neighbourhood CIL should be directed to these projects with District CIL becoming part of this funding equation. Where infrastructure projects accord with the CIL Regulations, the Council is aware this could mean that a project may not be 'match funded' with existing Neighborhood CIL or other funds.
- 4.4 Where several parishes are affected by £0 rated strategic sites all councils should work together to support and fund the delivery of local infrastructure projects.
- 4.5 Additional support will be provided by officers in the production of Parish Infrastructure Investment Plans (PIIPs), where no Neighbourhood plan is being prepared, and where required.
- 4.6 We will meet each Parish annually to review delivery of homes in their area and discuss the infrastructure demands and to assist with making District CIL bids.
- 4.7 Where bids accord with a PIIP or a Neighbourhood Plan, and direct links between the infrastructure in the bid and the strategic growth can be demonstrated, and the project accords with CIL Regulations, there will be a presumption in favor of supporting the bid. This will need to be tracked alongside housing delivery and the cumulative spend in each area will be reviewed and form a key consideration in the bid. It will be essential to demonstrate links with the demands of a growing population and the need for the infrastructure project.

## **5. Priorities for Funding Infrastructure Projects**

- 5.1 In order to understand which infrastructure should be prioritised for funding from District CIL it is necessary to develop a prioritisation framework. In this way the council will be able to consider those projects that have not been captured in the Local Plans or Neighbourhood Plans. Where town or parish councils have a 'made' Neighbourhood Plan and they receive 25% of the CIL collected from commenced development, this funding should be prioritised towards the infrastructure highlighted within the Neighbourhood

Plan and should also support the infrastructure in the Local Plan where this is a shared priority, for example for Health and Education infrastructure.

- 5.2 **Local infrastructure projects**, meeting the Local Infrastructure criteria will only be able to apply for District CIL within the Bid Window period. It should be noted that the 3% District CIL amount is allocated as a ceiling level of funding to put into the Local CIL Fund and project allocations outwards will reduce the available Local CIL Fund quickly. Allocations will therefore be made on a first come, first served basis. The 3% ceiling value of Local Infrastructure funding will be kept under annual review and the Local CIL Fund could be withdrawn or reduced where demands for CIL funding of statutory, critical, and essential infrastructure are high for that period.
- 5.3 Where the Local CIL Fund has not all been allocated in that funding period, any remaining funds will be ringfenced and added to the 3% available for the next bid round.
- 5.4 Where levels of District CIL are diminished, and where with large, planned for Essential Infrastructure projects coming in the pipeline, the CIL Spending Strategy allows for the Ringfencing of District CIL Funds to ensure adequate District CIL is available at the point a formal allocation decision is required to be made.
- 5.5 The following infrastructure types will be assessed accordingly together with the 'in all cases criteria' in the Principles of District CIL Spending section:

**Essential Infrastructure – will be planned for in CIL forecasting and will be considered first in bids**

- It is infrastructure necessary to support an approved development (proposed developments with planning permission granted) in order that development carried out is sustainable
- Is identified in the Infrastructure Delivery Framework of the Local Plans or is identified in the Neighbourhood Plan as a priority
- It represents key infrastructure (i.e. it is classified as critical or essential within the Infrastructure Delivery Framework of the Local Plan or the Neighbourhood Plan)
- The bid/identification of need must demonstrate that the time of delivery for funding is correct.

**It represents infrastructure detailed in the Infrastructure Funding Statement. Desirable Infrastructure – Will continue to be recognised in CIL spend forecasting and will be considered for bids on a case-by-case basis:**

- The provision of this infrastructure addresses a current inadequacy in infrastructure terms and the benefits of the infrastructure are clear
- The infrastructure is identified as 'desirable' or a 'priority' in the Local Plan or

Neighbourhood Plan or recent Parish Infrastructure Investment Plan (PIIP)

- Neighbourhood CIL funding has been formally allocated to fund the project
- It would allow infrastructure to be delivered through collaborative funding with District CIL being 'the last piece of the jigsaw'
- The parish council could request forward funding of the NCIL element of a project where it is clear that development is approved and due to commence in the area and it would be beneficial to deliver the infrastructure in advance of receiving the full amount of CIL.

**Beneficial Infrastructure – considered on a case-by-case basis and must meet one of the following:**

- By provision of infrastructure it would unlock ***further opportunities*** within the district for housing and employment growth – e.g. the relocation of a Community Centre or similar infrastructure to a new building which would be mostly funded through the sale/re-use of the land as residential or business use and there are adequate facilities in the area to serve the development.
- It is infrastructure which has not previously been identified as critical, essential, or desirable in the Infrastructure Delivery Frameworks (of the Local Plans) or within a Neighbourhood Plan, but a clear link can be identified in supporting the sustainability of the Local Plan.
- It is infrastructure which addresses a recently unexpected shortfall in infrastructure or community provision accounted for as having an influence on the sustainability of a community in the Local Plan. - e.g. *closure of a pre-school facility and the need for a replacement, or the more rapid adoption of the use of electric vehicles or other beneficial environmental infrastructure or technologies.*

**Local Infrastructure – considered on a case-by-case basis and must meet all of the following:**

- Be located in or close to areas where new developments are coming forwards (granted permissions have commenced or are about to commence)
- Increase provision/capacity or provide additionality of function
- Be deliverable in the short term (within 2/3 years)

- Projects should be partly funded through Neighbourhood CIL or have a minimum of 50% match funding guaranteed
- Be identified through a Parish Infrastructure Investment Plan or Neighbourhood Plan
- Have written support of the Ward Member(s)
- Be seeking a maximum of £50,000 Local CIL Fund or District CIL Fund

## **6. District CIL does not fund**

6.1 As well as being clear about what CIL could be used for, it is equally as important to be clear about the project costs that District CIL cannot fund. The following should no longer be considered appropriate spend from District CIL:

- Up front funding for feasibility studies and professional fees where there is no guarantee that the infrastructure would be delivered;
- Infrastructure replacement or improvements in areas where there are no major developments commencing and there is limited growth;
- Infrastructure that is not supported by lead statutory bodies, for example, traffic calming or pedestrian crossings if these are not considered as required infrastructure by the Highways Authority, projects within education settings (including Academy and other school or early years settings) that are not supported by Suffolk County Council;
- Ongoing operational or maintenance costs; and
- VAT where this can be reclaimed.

## **7. Governance Arrangements**

7.1 A representative group from across the council will work with Major Sites and Infrastructure Officers to review applications for District CIL and to ensure that the CIL Spending Strategy operates in line with the processes further detailed. The following key points relate to this group.

- Meetings will be held at least 4 times per year and District CIL funded projects will be recommended to Cabinet for approval in September each year;
- Additional attendance at meetings of this group will be at the sole invite of the Chair;
- The CIL Spending Working Group is not a forum for presentations from potential funding applicants, promotion of local projects by either members of the group or substitute or other invited member attendance;
- The CIL Spending Working Group is not a forum for appeals against District CIL funding decisions.
- All District CIL funding decisions are final.

A copy of the updated Terms of Reference for the CIL Spending Working Group are held as **Appendix B**.

## **8. Operation and review of the CIL Spending Strategy:**

### **Period 1 of CIL Spending Strategy (April 2020 to March 2022):**

1. In order to understand the scale of developments commencing in this period and the likely CIL receipts from this income, and to focus spend on immediately deliverable essential infrastructure, the first year of the CIL Spending Strategy should not fund “Desirable” and “Beneficial” Infrastructure.
2. Period 1 will also allow time to understand the likely timescales for delivery of essential infrastructure and the impact on current District CIL funds, through close working with infrastructure providers.
3. CIL Spending Group to monitor Neighbourhood CIL Spending and be aware of non-compliance and clawback position and to assist in promotion of spend and reporting compliance and timeliness of spend.
4. CIL Spending Group to monitor completion of the first Infrastructure Funding Statement, setting the template for delivery of this moving forwards.
5. Agreeing the ring-fencing and spend on infrastructure projects put forward for approval that will go into the Infrastructure Funding Statement.

### **Period 2 of CIL Spending Strategy (April 2022 to March 2023):**

1. CIL Spending Group to review types and nature of both Desirable and Beneficial Infrastructure and level of windfall development to understand if amounts in this category are going to put delivery of Essential Infrastructure at risk.
2. CIL Spending Group to consider if a ceiling level of funding or % restriction should apply to amounts allocated to Desirable and Beneficial Infrastructure.
3. Review of progress of projects that have been allocated District CIL.
4. Establish a local projects pot or maximum annual % allocation for Community Projects that would support growth.
5. Recommendation of changes to Cabinet.

### **Period 3 of CIL Spending Strategy (April 2023 to March 2024):**

1. Opening of Local Infrastructure fund from **1 April 2023**.
2. Review of progress of projects that have been allocated District CIL.
3. Review of ringfencing, validation and prioritisation process.
4. Review of affordability and the appropriateness of the CIL Spending approach. \*
5. Recommendation of changes to Cabinet.

#### **Period 4 of CIL Spending Strategy (April 2024 to March 2025):**

1. Review of progress of projects that have been allocated District CIL and Local CIL.
2. Review of the operation of the changes to the CIL Spending Strategy.
3. Review the Local CIL Fund % allocation.
4. Review of affordability and the appropriateness of the CIL Spending approach. \*
5. Recommendation of changes to Cabinet.

\* Where there are changes to legislation and guidance that require an earlier review this will be moved into the relevant period.

#### **Period 5 of CIL Spending Strategy (April 2025 to March 2026):**

1. Review of progress of projects that have been allocated District CIL and Local CIL.
2. Review of the operation of the changes to the CIL Spending Strategy (£0 CIL Areas)
3. Review the Local CIL Fund % allocation.
4. Review of affordability and the appropriateness of the CIL Spending approach. \*
5. Recommendation of changes to Cabinet.

### **9. Documentation, Validation and Bid Review**

#### **For Essential, Desirable and Beneficial Infrastructure projects:**

- 9.1 Where applications are made by statutory infrastructure providers, such as Police, Health, Highways and Education these should not require further evidence of value for money since procurement frameworks are reviewed ensuring best value is achieved. The expectation is that the projects form part of the relevant organisation's Capital Programme. Furthermore, these bodies are also required to report on the use of developer contributions for transparency.
- 9.2 Where applications are made by local councils and other community or charitable bodies, these will have slightly greater information requirements in order to ensure best value is obtained, to be clear on funding sources and to further understand State Subsidy implications.
- 9.3 Downloadable District CIL Fund application forms will be held on the CIL Spending webpages, together with a template for a business plan.
- 9.4 It is important that applications (or bids) for District CIL Funds are robust and relate to projects that are "oven ready" and all avenues for collaborative funding have been explored (this is particularly in the case of desirable and beneficial infrastructure). If further information is required, a failure to provide this in a timely manner may delay the bid from validation and prioritisation. Where information is not provided by deadlines set within this process the likelihood that a bid is rejected will be increased. Occasionally bids may be held over for the next funding year, if the application is likely to meet the prioritisation criteria but lacks a small amount of information. The

decision by the CIL Spending Group to reject or hold over a bid will be final.

- 9.5 Where bids are unsuccessful an explanation will be provided in writing to the applicants.
- 9.6 Application supporting documents relating to invalid applications that have been rejected will only be retained for a 2-year period, with the exception of the application form, validation checklist and decision notes which will be retained for a 7-year period.
- 9.7 The CIL Spending Working Group may recommend that bids submitted by statutory partners be given an approval “in principle” decision to allow CIL funding to be allocated to the project until such times as the project can then progress. This would only apply to bids where planning permission or other minor barrier prevents the bid from being valid and where the project will commence within 6 months of the “in Principle” decision.

**For Local Infrastructure Projects only:**

- 9.8 A separate application form is available to download for local infrastructure projects.
- 9.9 All proposed projects should be match funded and should not be seeking in excess of £50,000 in Local CIL funding.
- 9.10 The application should be supported by a relevant ward member and evidence to confirm the types of match funding.
- 9.11 Neighbourhood CIL should form part of the funding for the project.
- 9.12 Once your application has been confirmed as being a valid application by the Infrastructure Team, the CIL Spending Working Group will review the application.
- 9.13 Confirmation of the decision will be provided in writing. All decisions are final.
- 9.14 Once the 3% local fund has been fully allocated the Fund will close and this will be updated on the CIL Spending Webpage.

**Applications for Forward Funding of Neighbourhood CIL only:**

- 9.15 A separate application form is available to download for requests for forward funding of Neighbourhood CIL for a priority local infrastructure project.
- 9.16 The project must be identified as required in the Neighbourhood Plan or Parish Infrastructure Investment Plan and be deliverable in the short term.
- 9.17 Confirmation of the decision will be provided in writing.
- 9.18 All decisions are final.

## 10. Promotion and Communication of the Strategy

10.1 The CIL Spending Strategy will be available via the councils Spending CIL webpages.  
The Strategy will be promoted to key stakeholder groups and internal teams.

<b>Type</b>	<b>Interest</b>	<b>Influence</b>	<b>Action</b>
Cabinet	High	High	Annual update for Infrastructure Funding Statement and periodic update via CIL Spending Group feedback
Ward Councillors	High	High	Promote through member training on CIL
Parish Councillors	High	High	Promote through Parish Liaison Workshops in January 2020 and ongoing CIL Training
Finance Team	High	Low	Promote through internal comms and CIL CPD Training
Planning Teams	High	High	Promote through internal comms and CIL CPD Training
Land Charges	High	Low	Promote through internal comms and CIL CPD Training
Managers	High	High	Promote through internal comms and CIL CPD Training
CEO/Directors	High	High	Promote through internal comms and CIL CPD Training
Solicitors	Medium	Low	Available via Spending CIL webpages
House Purchasers	Medium	Low	Available via Spending CIL webpages
Agents	High	Low	Use Developer Forum to promote
Developers	High	Low	Use Developer Forum to promote
Community Groups, Public	Medium	Low	Available via Spending CIL webpages
Press	Medium	High	Available via Spending CIL webpages – Separate promotion of Projects on delivery

## **11. Key Contacts**

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Major Sites and Infrastructure Manager  
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Nicola Parrish | Infrastructure Delivery Manager  
Major Sites and Infrastructure Team  
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01502 523057

Jen Mills  
CIL & s106 Officer  
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01502 523057

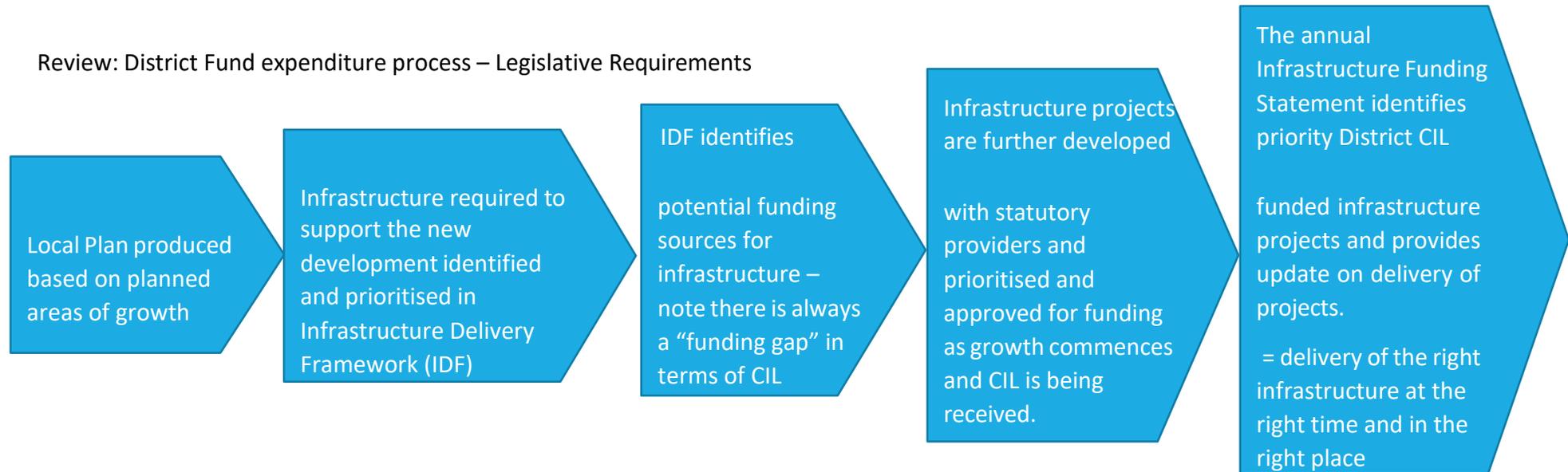
## **12. Appendices**

**Appendix A:** Legislation and Guidance Review: Requirements and actions

**Appendix B:** Terms of Reference: CIL Spending Group

## Appendix A: Legislation and Guidance Review: Requirements and actions

Review: District Fund expenditure process – Legislative Requirements



<p><b>NPPF - 19 February 2019</b></p>	<p><b>2. Achieving sustainable development</b></p> <p>7. ‘The purpose of the planning system is to contribute to the achievement of sustainable development.’</p> <p>8 Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):</p> <p>a) <b>an economic objective</b> – to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;</p>	<p><b>Actions:</b></p> <p><b>Planning Services</b></p> <p>Infrastructure needs (including cumulative impact) are identified through the Local Plan and planning consultation process in relation to major development (10 dwellings and over).</p> <p>Systems established to monitor commencement of major developments and to ringfence District CIL to ensure delivery of Key Infrastructure that is critical or essential to support the increase in demand.</p>
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	<p>b) <b>a social objective</b> – to support strong, vibrant, and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and</p> <p>c) <b>an environmental objective</b> – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</p>	<p>Infrastructure provided in a timely manner, to support growth and, for example, enable local access to services and open space and cycle routes.</p> <p>Where it is possible to improve existing infrastructure to increase capacity, this must be more energy efficient and sustainable.</p>
<p><b>CIL Regulations 2010 (as amended)</b></p>	<p><b>PART 7. Application to infrastructure</b></p> <p><b>59</b> (1) A charging authority must apply CIL to funding the provision, improvement, replacement, operation or maintenance of infrastructure to support the development of its area.</p> <p>(3) A charging authority may apply CIL to funding the provision, improvement, replacement, operation, or maintenance of infrastructure outside its area where to do so would support the development of its area.</p> <p><b>Annual infrastructure funding statements 121A.—</b>  (1) Subject to paragraph (2), no later than 31st December in each calendar year a contribution receiving authority must publish a document (“the annual infrastructure funding statement”)</p>	<p><b>The Infrastructure Team</b></p> <p>It should be noted that CIL Spending priorities will depend on commencements, cumulative impacts, and the delivery timescales of infrastructure partners. Where possible opportunities to maximise the application of CIL will be sought to ensure Neighbourhood CIL and other funding sources help to deliver local infrastructure with a collaborative spend approach. In this way we will be able to deliver more and the benefit from CIL will be wider.</p> <p><b>The Infrastructure Team</b> will produce the annual Infrastructure Funding Statement which will include detail of those infrastructure projects that are considered critical and essential to be delivered in the short term as housing development related to the area commences.</p>

	<p>which comprises the following—</p> <p>(a) a statement of the infrastructure projects or types of infrastructure which the charging authority intends will be, or may be, wholly or partly funded by CIL (other than CIL to which regulation 59E or 59F applies) (“the infrastructure list”);</p> <p>(b) a report about CIL, in relation to the previous financial year (“the reported year”), which includes the matters specified in paragraph 1 of Schedule 2 (“CIL report”);</p> <p>(c) a report about planning obligations, in relation to the reported year, which includes the matters specified in paragraph 3 of Schedule 2 and may include the matters specified in paragraph 4 of that Schedule (“section 106 report”).</p> <p>(2) The first annual infrastructure funding statement must be published by 31st December 2020.</p>	<p>As new technology is introduced, some of this information will be provided via a dedicated interactive Developer Contributions Database in order to provide transparency of Infrastructure Funding financial information on a “real time” basis.</p>
<p><b>National Planning Practice Guidance</b></p>	<p>Local authorities must spend the levy on infrastructure needed to support the development of their area, and they will decide what infrastructure is needed.</p> <p>The levy can be used to increase the capacity of existing infrastructure or to repair failing existing infrastructure if that is necessary to support development.</p> <p>Charging authorities may not use the levy to fund affordable housing.</p> <p>The Neighbourhood portion of the levy can be spent on a wider range of things than the rest of the levy, provided that it meets the requirement to ‘support the development of the area’. The wider definition means that</p>	<p><b>The Major Sites and Infrastructure Team and the CIL Spending Working Group</b> will ensure that applications for District CIL will be prioritised for funding from District CIL where they can provide timely, deliverable projects that support the growth detailed in the Local Plan. Funding should be focused towards critical and essential projects already identified as required in the Local Plan Infrastructure Frameworks.</p> <p>With the implementation of a Developer Contributions Management System, all stakeholders will be able to see how funding is being allocated and spent to deliver infrastructure to support the area.</p>

	<p>the Neighbourhood portion can be spent on things other than infrastructure (as defined in the Community Infrastructure Levy regulations) provided it is concerned with addressing the demands that development places on the parish’s area. For example, the pot could be used to fund affordable housing.</p>	
<b>Local Plan</b>	<p>As part of each Local Plan there is an Infrastructure Delivery Framework. The tables within this section detail the importance of the infrastructure in terms of local plan delivery and prioritise the infrastructure in terms of being critical, essential, and desirable.</p>	<p><b>Major Sites and Infrastructure Team</b> Have regard to the critical, essential and desirable infrastructure projects required to support delivery of the Local Plan. Discuss delivery timescales and funding arrangements with key infrastructure providers such as Highways, Education, Police, Health, etc. – adopting the principles of the right infrastructure, in the right place and at the right time.</p>
<b>Monitoring CIL and the Infrastructure Funding Statement</b>	<p><b>Comprehensive monitoring arrangements</b> established to ensure commencements of CIL liable development (over 10 dwellings) are identified and the infrastructure requirements, put forward and agreed in the planning process) are prioritised for District CIL allocation to ensure timely delivery.</p>	<p><b>Planning Policy &amp; Delivery Team including the Major Sites and Infrastructure Team</b> - Tracking of development delivery to ensure CIL Funded projects are identified and discussed with key infrastructure stakeholders and added to Infrastructure Funding Statement to ensure funds are “safeguarded” to secure imminent delivery. Meeting regularly (minimum quarterly) with Health, Education, Highways and Waste to understand timing of proposed projects and current costings. Utilising Exacom system for CIL income forecasting to ensure funds are available where there are a large number of high-cost infrastructure projects planned in any given year.</p>

## Appendix B: Terms of Reference: CIL Spending Working Group

### Community Infrastructure Levy (CIL) Spending Working Group

#### Terms of Reference:

- To act in an advisory/consultative capacity to the Cabinet Member for Planning and Coastal Management and through him/her to Cabinet/Full Council, as appropriate.
- To work with officers to review and prioritise applications for infrastructure funding through District Community Infrastructure Levy (DCIL), and to consider the relevance of applications in terms of the objectives of CIL through making development sustainable in planning terms.
- To work with officers to review and approve applications for infrastructure funding through District Community Infrastructure Levy Local CIL Fund (LCIL), and to consider the relevance of applications in terms of the objectives of CIL through making development sustainable in planning terms. Approvals are at a maximum LCIL funding of £50,000 per project.
- Take into account the wider strategic planning issues and collaboration with other local authorities, particularly those within the same housing market area and functional economic area and those infrastructure providers priorities.
- Consider the findings of evidence base documents to inform the preparation of documents.
- To work with officers to agree and publish issues and options papers and recommendations for infrastructure projects to be funded through DCIL for approval by Cabinet.
- To work with officers to review and support the issue of clawback notices where local town and parish councils have not spent Neighbourhood CIL (NCIL) in compliance with the CIL Regulations and the 5-year spending deadline.
- To agree on NCIL spend in areas not covered by a Parish Council.
- Act as a focal point for knowledge and information about the application of DCIL and Neighbourhood CIL (NCIL) to infrastructure projects.
- Receive progress updates on the delivery of DCIL funded infrastructure projects, as relevant.
- To scrutinise and input to the review of CIL Spending Strategy to ensure compliance with regulatory requirements and the continued delivery of infrastructure to support growth in the area and where necessary outside of the area where strategic infrastructure supports growth in the East Suffolk area.
- To review and agree the annual Infrastructure Funding Statement.

The Working Group will meet at least 4 times a year, subject to business.

Vice Chairman to be elected at the first meeting of the municipal year.

No substitutes. Other Ward Members can only be invited at the discretion of the Chairman of the CIL Spending Working Group to observe and/or answer questions.

The Working Group maintains a standing invite to relevant officers responsible for the delivery of infrastructure and other local authority or Health representatives and organisations will also

be invited as and when appropriate.

**Membership - 8 (Quorum 4)**

Either the Cabinet Member with the responsibility for Planning and Coastal Management, or his/her Assistant Cabinet Member (Chair) (1)

Relevant Cabinet Members (2)

Relevant Planning Committee Chairman/Vice-Chairman from Planning Committee North and Planning Committee South (2)

Conservative Group Member (1)

Labour Group Member (1)

GLI Group Member (1)







## CABINET

Tuesday, 05 September 2023

<b>Subject</b>	Coastal Adaptation Supplementary Planning Document
<b>Report by</b>	Councillor Kay Yule Cabinet Member with responsibility for Planning and Coastal Management
<b>Report Author(s)</b>	Andrea McMillan Planning Manager (Policy, Delivery and Specialist Services) <a href="mailto:andrea.mcmillan@eastsoffolk.gov.uk">andrea.mcmillan@eastsoffolk.gov.uk</a>  Adam Nicholls Principal Planner (Policy and Delivery) <a href="mailto:adam.nicholls@eastsoffolk.gov.uk">adam.nicholls@eastsoffolk.gov.uk</a>  Anthony Taylor Senior Planner (Policy and Delivery) <a href="mailto:anthony.taylor@eastsoffolk.gov.uk">anthony.taylor@eastsoffolk.gov.uk</a>
<b>Head of Service</b>	Philip Ridley Head of Planning and Coastal Management <a href="mailto:philip.ridley@eastsoffolk.gov.uk">philip.ridley@eastsoffolk.gov.uk</a>
<b>Director</b>	Nick Khan Strategic Director <a href="mailto:nick.khan@eastsoffolk.gov.uk">nick.khan@eastsoffolk.gov.uk</a>

Is the report Open or Exempt?	OPEN
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Category of Exempt Information and reason why it is <b>NOT</b> in the public interest to disclose the exempt information.	Not applicable
<b>Wards Affected:</b>	All Wards

## Purpose and high-level overview

### **Purpose of Report:**

The purpose of this report is to recommend the adoption of the Coastal Adaptation Supplementary Planning Document (the Coastal Adaptation SPD).

The Coastal Adaptation SPD supports the implementation of policies relating to development within the Coastal Change Management Area, and rollback and relocation away from the coast in Suffolk Coastal Local Plan and Waveney Local Plan. The policies are principally:

SCLP9.3 Coastal Change Management Area (Suffolk Coastal Local Plan)

SCLP9.4 Coastal Change Rollback and Relocation (Suffolk Coastal Local Plan)

WLP8.25 Coastal Change Management Area (Waveney Local Plan)

WLP8.26 Relocation and Replacement of Development Affected by Coastal Erosion (Waveney Local Plan)

The Coastal Adaptation SPD provides guidance including the economic, social and environmental impacts of coastal change; the national, and local policy framework; development within the Coastal Change Management Area; rollback and relocation; enabling development; and case study examples of coastal adaptation.

The Coastal Adaptation SPD is appended at Appendix A of this report.

### **Options:**

Adopt the Coastal Adaptation SPD. This will mean the Council has an SPD in place to guide the implementation of the coastal change planning policies.

An alternative option would be to not adopt the Coastal Adaptation SPD and continue to implement the planning policies without the additional guidance. However, this would be a missed opportunity to provide further clarification on the requirements of the policies and to ultimately support effective implementation of the relevant Local Plan policies. As a jointly-prepared SPD with some other Norfolk councils and the Broads Authority, it would also be a missed opportunity to share the benefits of that joint working.

### **Recommendation/s:**

1. That the Coastal Adaptation Supplementary Planning Document be adopted.
2. That the Head of Planning and Coastal Management, in consultation with the Cabinet Member with responsibility for Planning and Coastal Management, be authorised to make any presentational or typographical amendments to the Coastal Adaptation Supplementary Planning Document prior to it being published.

## Corporate Impact Assessment

**Governance:**

No impacts.

**ESC policies and strategies that directly apply to the proposal:**

The Coastal Adaptation SPD primarily supports the implementation of policies SCLP9.3 Coastal Change Management Area and SCLP9.4 Coastal Change Rollback and Relocation of the Suffolk Coastal Local Plan (2020), as well as policies WLP8.25 Coastal Change Management Area and WLP8.26 Relocation and Replacement of Development Affected by Coastal Erosion of the Waveney Local Plan (2019).

The Coastal Adaptation SPD is a joint document prepared with Great Yarmouth Borough Council, North Norfolk District Council, the Broads Authority, with the assistance of the shared Coastal Partnership East Team. As such, in addition to the policies contained in the Suffolk Coastal Local Plan and Waveney Local Plan, the Coastal Adaptation SPD will also assist the implementation of coastal adaptation policies of the Local Plans of the aforementioned bodies.

**Environmental:**

The Coastal Adaptation SPD contains guidance relating to the consideration of development on the coast and relocating development away from the coast with the aim of avoiding inappropriate development on areas of the coast at risk of coastal change and the environmental impacts of such development. A Strategic Environmental Assessment Screening Opinion (Appendix C) was undertaken and concluded that a full Strategic Environmental Assessment would not be necessary. A Habitats Regulations Assessment Screening Statement (Appendix D) was also undertaken and concluded that the Coastal Adaptation SPD will not lead to likely significant effects on protected Habitat sites.

**Equalities and Diversity:**

An Equality Impact Assessment Screening Opinion (Appendix E) was produced in October 2022 to accompany consultation on the draft Coastal Adaptation SPD. The Coastal Adaptation SPD has also been subject to separate Equality Impact Analysis as part of the production of this report (ref: EQIA534213028) in July 2023. Both assessments concluded no differential negative impacts on those with protected characteristics.

**Financial:**

The production and adoption of the Coastal Adaptation SPD is covered by the existing budget of the Planning Policy and Delivery Team.

**Human Resources:**

No impacts.

**ICT:**

No impacts.

**Legal:**

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

The Coastal Adaptation SPD has been subject to a Strategic Environmental Assessment Screening Opinion (Appendix C) in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended). It has also been subject to a Habitats Regulation Assessment Screening Statement (Appendix D) in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended). An Equality Impact Assessment Screening opinion (Appendix E) was produced to meet the requirements of the Equality Act 2010.

**Risk:**

There are no risks envisaged in relation to the implementation of the recommendations.

**External Consultees:**

The Coastal Adaptation SPD has been subject to consultation during its preparation in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the Council's Statement of Community Involvement (April 2021). The list of consultees, respondents, summaries of their comments and how these have been responded to can be found in the Consultation Statement which is appended to this report (Appendix B).

## Strategic Plan Priorities

Select the priorities of the <a href="#">Strategic Plan</a> which are supported by this proposal: <i>(Select only one primary and as many secondary as appropriate)</i>		Primary priority	Secondary priorities
<b>T01</b>	<b>Growing our Economy</b>		
P01	Build the right environment for East Suffolk	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P02	Attract and stimulate inward investment	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P03	Maximise and grow the unique selling points of East Suffolk	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P04	Business partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P05	Support and deliver infrastructure	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>T02</b>	<b>Enabling our Communities</b>		
P06	Community Partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P07	Taking positive action on what matters most	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P08	Maximising health, well-being and safety in our District	<input checked="" type="checkbox"/>	<input type="checkbox"/>
P09	Community Pride	<input type="checkbox"/>	<input type="checkbox"/>
<b>T03</b>	<b>Maintaining Financial Sustainability</b>		
P10	Organisational design and streamlining services	<input type="checkbox"/>	<input type="checkbox"/>
P11	Making best use of and investing in our assets	<input type="checkbox"/>	<input type="checkbox"/>
P12	Being commercially astute	<input type="checkbox"/>	<input type="checkbox"/>
P13	Optimising our financial investments and grant opportunities	<input type="checkbox"/>	<input type="checkbox"/>
P14	Review service delivery with partners	<input type="checkbox"/>	<input type="checkbox"/>

<b>T04</b>	<b>Delivering Digital Transformation</b>		
P15	Digital by default	<input type="checkbox"/>	<input type="checkbox"/>
P16	Lean and efficient streamlined services	<input type="checkbox"/>	<input type="checkbox"/>
P17	Effective use of data	<input type="checkbox"/>	<input type="checkbox"/>
P18	Skills and training	<input type="checkbox"/>	<input type="checkbox"/>
P19	District-wide digital infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
<b>T05</b>	<b>Caring for our Environment</b>		
P20	Lead by example	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P21	Minimise waste, reuse materials, increase recycling	<input type="checkbox"/>	<input type="checkbox"/>
P22	Renewable energy	<input type="checkbox"/>	<input type="checkbox"/>
P23	Protection, education and influence	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>XXX</b>	<b>Governance</b>		
XXX	How ESC governs itself as an authority	<input type="checkbox"/>	<input type="checkbox"/>
<b>How does this proposal support the priorities selected?</b>			
The Coastal Adaptation SPD supports the delivery of Strategic Plan priority P08 by providing guidance to support the implementation of policies contained in the Local Plans which support appropriate development in the right places.			

## Background and Justification for Recommendation

<b>1</b>	<b>Background facts</b>		
1.1	The Coastal Adaptation SPD has been prepared by a partnership of East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority, with the support of the shared Coastal Partnership East team. These authorities and Coastal Partnership East are signatories to the Norfolk and Suffolk Coastal Authorities Statement of Common Ground Coastal Zone Planning (September 2018) (Appended to the Coastal Adaptation SPD). This Statement of Common Ground, amongst other things, recognises the importance of cross boundary working in relation to coastal management. The Coastal Adaptation SPD is an example of cross boundary working to support the common goal of coastal adaptation.		
1.2	The purpose of the Coastal Adaptation SPD is to provide guidance on the implementation of Local Plan policies along the coast from Holkham (Norfolk) to Landguard Point, Felixstowe (Suffolk).		
1.3	The Council has two adopted Local Plans: the Waveney Local Plan (adopted in March 2019) and the Suffolk Coastal Local Plan (adopted in September 2020). These Local Plans both contain policies that support coastal adaptation, namely policies SCLP9.3 Coastal Change Management Area and SCLP9.4 Coastal Change Rollback and Relocation (Suffolk Coastal Local Plan) and policies WLP8.25 Coastal Change Management Area and WLP8.26 Relocation and Replacement of Development Affected by Coastal Erosion (Waveney Local Plan).		
1.4	There is currently an adopted Development and Coastal Change Supplementary Planning Document (September 2013), which covers the former Waveney area of East Suffolk. Once adopted the Coastal Adaptation SPD will supersede the Development and Coastal Change SPD, cover the whole of East Suffolk, and		

	provide updated and consistent planning guidance across East Suffolk (as well as Great Yarmouth, North Norfolk, and the Broads Authority). There is currently no adopted coastal adaptation planning guidance in the former Suffolk Coastal area of East Suffolk.
1.5	The Coastal Adaptation SPD (Appendix A) provides guidance on a range of topics including appropriate development within the Coastal Change Management Area, the requirements in relation to rollback and relocation of development away from the coast, consideration of enabling development proposals, and coastal adaptation case studies.
1.6	The Coastal Adaptation SPD cannot: <ul style="list-style-type: none"> <li>• conflict with planning policies nor can it prescribe that particular areas of land be developed for particular uses; this is the role of the wider development plan (e.g. local plan and neighbourhood plan) for each local planning authority;</li> <li>• Create new, amend or revoke coastal management policies concerning the management of each stretch of coast relevant to the Coastal Adaptation SPD contained in Shoreline Management Plans;</li> <li>• Address Nationally Significant Infrastructure Projects (NSIPs) – large scale infrastructure development that is not determined by local planning authorities but by the relevant Secretary of State;</li> <li>• Address nationally permitted development rights – development that does not require planning permission by virtue of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended; or</li> <li>• Address wider support for or calls for compensation arising from properties and/or land at risk of coastal change – with the exception of houses owned before 2009, where a Government grant for surveys/demolition may be available.</li> </ul>
1.7	The Coastal Adaptation SPD has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (the 2012 Regulations).
1.8	The preparation of the Coastal Adaptation SPD has involved officers from the Council’s Planning Policy and Delivery, Development Management, and the shared Coastal Partnership East teams. The preparation of the document has been overseen by the Local Plan Working Group. There has been a combined officer Steering Group, comprising officers from Great Yarmouth Borough Council, North Norfolk District Council, and the Broads Authority, as well as Coastal Partnership East
1.9	The 2012 Regulations (as amended) require the Council to undertake consultation to inform the production of the Coastal Adaptation SPD and, as a minimum, require that the draft document is published for four weeks and that during that time it is available on the Council’s website and that physical copies are available for inspection in the Council offices. The Council’s adopted Statement of Community Involvement (April 2021) also sets out further measures and actions that the Council will undertake when consulting on a draft SPD including publicising via social media sites and making copies of documents available in libraries.
1.10	The Coastal Adaptation SPD was subject to two rounds of consultation during its preparation, the details of which are contained in the Consultation Statement

	<p>(Appendix B). The first was an initial consultation to inform the scope and content of the Coastal Adaptation SPD (<a href="https://eastsoffolk.inconsult.uk/coastaladaptationspd2020/consultationHome">https://eastsoffolk.inconsult.uk/coastaladaptationspd2020/consultationHome</a>). The initial consultation was carried out for six weeks between 4 September and 16 October 2020. This initial consultation took the form of a questionnaire, to which 63 respondents made 288 comments. Summaries of the consultation responses, and how they were addressed in drafting the Coastal Adaptation SPD, are contained in the Consultation Statement (Appendix B).</p>
1.11	<p>The main issues raised through the initial consultation on the broad scope and content of the Coastal Adaptation SPD were:</p> <ul style="list-style-type: none"> <li>• The Coastal Adaptation SPD should change planning policies contained in the Local Plans</li> <li>• The Coastal Adaptation SPD should recognise the importance of the natural and historic environment along the coast and the benefits these environments provide communities and businesses</li> <li>• The Coastal Adaptation SPD should explain the differences between land based and marine planning, and local and national policy</li> <li>• Technical planning jargon/language should be avoided wherever possible</li> <li>• The Coastal Adaptation SPD should provide guidance on the different types of development acceptable at different parts of the coast</li> <li>• The Coastal Adaptation SPD should provide guidance relating to the various risk zones added to the CCMA through local plan policies</li> <li>• A range of coastal adaptation best practice case studies were suggested</li> </ul>
1.12	<p>The preparation of the draft Coastal Adaptation SPD addressed many of the comments received (where appropriate) including:</p> <ul style="list-style-type: none"> <li>• The Coastal Adaptation SPD includes important references to the statutory and non-statutory natural and historic environment designations</li> <li>• The Coastal Adaptation SPD includes a chapter on national and local policy frameworks across the land and marine based planning realms</li> <li>• The Coastal Adaptation SPD was drafted in a manner that sought to reduce the use of technical planning jargon/language so far as possible. However, where there is a need to use technical language, such words and phrases were added to the glossary</li> <li>• The Coastal Adaptation SPD sets out which types of development will be acceptable within different parts of the CCMA along the coast</li> <li>• The Coastal Adaptation SPD includes guidance on the risk zones added to the CCMA through local plan policies</li> <li>• Case studies of coastal adaptation are included in the Coastal Adaptation SPD</li> </ul>
1.13	<p>Under the Environmental Assessment of Plans and Programmes Regulations 2004, screening was carried out on the draft Coastal Adaptation SPD to determine whether a full Strategic Environmental Assessment would be required. The screening concluded that this was not necessary. The final Strategic Environmental Assessment Screening Opinion is appended to this report (Appendix C).</p>
1.14	<p>Habitat Regulations Assessment screening was also undertaken which concluded that implementation of the Coastal Adaptation SPD would not lead to likely significant effects on protected Habitat Sites and that it is therefore not considered necessary to undertake an Appropriate Assessment. The final Habitat Regulations Assessment Screening Statement is appended to this report (Appendix D).</p>

<b>2 Current position</b>	
2.1	<p>Consultation on the draft Coastal Adaptation SPD ran for six weeks between 25 January and 8 March 2023 (<a href="https://eastsuffolk.inconsult.uk/draftcoastaladaptationspd2023/consultationHome">https://eastsuffolk.inconsult.uk/draftcoastaladaptationspd2023/consultationHome</a>). The consultation was advertised on the Council’s website, as well as on social media. Emails and letters were sent out at the start of the consultation to the consultees on the Planning Policy mailing list which includes town and parish councils, individuals and organisations, including those who were previously contacted or responded to the informal stage of the consultation. In total, 52 respondents made 185 comments.</p>
2.2	<p>The main themes of the comments received are summarised below; however, some of the comments covered very specific matters and it is not possible to summarise all of them here in a succinct manner. The full consultation responses are presented in the Consultation Statement (Appendix B).</p>
2.3	<p>The main issues raised through the consultation on the draft Coastal Adaptation SPD were:</p> <ul style="list-style-type: none"> <li>• The Coastal Adaptation SPD should address flood risk as well as erosion risk</li> <li>• The Coastal Adaptation SPD should alter the planning policies contained in the Local Plans</li> <li>• The Coastal Adaptation SPD should alter the coastal management approach for each stretch of the coast</li> <li>• The Coastal Adaptation SPD is difficult to understand due to the use of jargon and technical language</li> <li>• Greater emphasis should be placed on the sensitive natural and historic environment along the coast</li> <li>• The Coastal Adaptation SPD should address Nationally Significant Infrastructure Projects</li> <li>• Development at or near the coast should not hinder opportunities to realign the England Coast Path</li> <li>• The approximate appropriate distance that development may be relocated away from a settlement should be increased</li> </ul>
2.4	<p>Changes have been made to address many of the comments received (where appropriate) including:</p> <ul style="list-style-type: none"> <li>• Clarification that the Coastal Adaptation SPD does not explicitly address flood risk, which is assessed through other planning policies and site-specific flood risk assessments</li> <li>• Clarification that the Coastal Adaptation SPD cannot alter planning policies contained in a Local Plan</li> <li>• Clarification that the Coastal Adaptation SPD cannot alter the coastal management approach for any stretch of coast set out in Shoreline Management Plans</li> <li>• Avoiding jargon and technical language where possible, acknowledging that technical language may be necessary in some circumstances</li> <li>• Greater emphasis has been placed on the sensitive landscape and wildlife environment along large parts of the coast</li> </ul>

	<ul style="list-style-type: none"> <li>• Clarification that the Coastal Adaptation SPD cannot address Nationally Significant Infrastructure Projects, which are determined by the relevant Secretary of State</li> <li>• Development at or near the coast should not hinder opportunities to realign the England Coast Path</li> <li>• The approximate appropriate distance that development may be relocated away from a settlement has been increased.</li> </ul> <p>In addition, further changes have been made to address typographical and grammatical errors and to provide clarity on certain elements of guidance.</p>
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### 3 How to address current situation

3.1	It is recommended that Cabinet adopts the Coastal Adaptation SPD (Appendix A), allowing for any necessary typographical and presentational amendments to be made prior to the Coastal Adaptation SPD being published. Once adopted, the Coastal Adaptation SPD will be a material consideration in the determination of relevant planning applications.
3.2	The partnership authorities (Great Yarmouth Borough Council, North Norfolk District Council, and The Broads Authority) involved in the preparation of the Coastal Adaptation SPD are also proposing to adopt the Coastal Adaptation SPD in September/October 2023.

### 4 Reason/s for recommendation

4.1	Adoption of the Coastal Adaptation SPD will provide up to date guidance to assist with the implementation of the Council's Local Plan policies SCLP9.3 Coastal Change Management Area and SCLP9.4 Coastal Change Rollback and Relocation of the Suffolk Coastal Local Plan; and policies WLP8.25 Coastal Change Management Area and WLP8.26 Relocation and Replacement of Development Affected by Coastal Erosion of the Waveney Local Plan.
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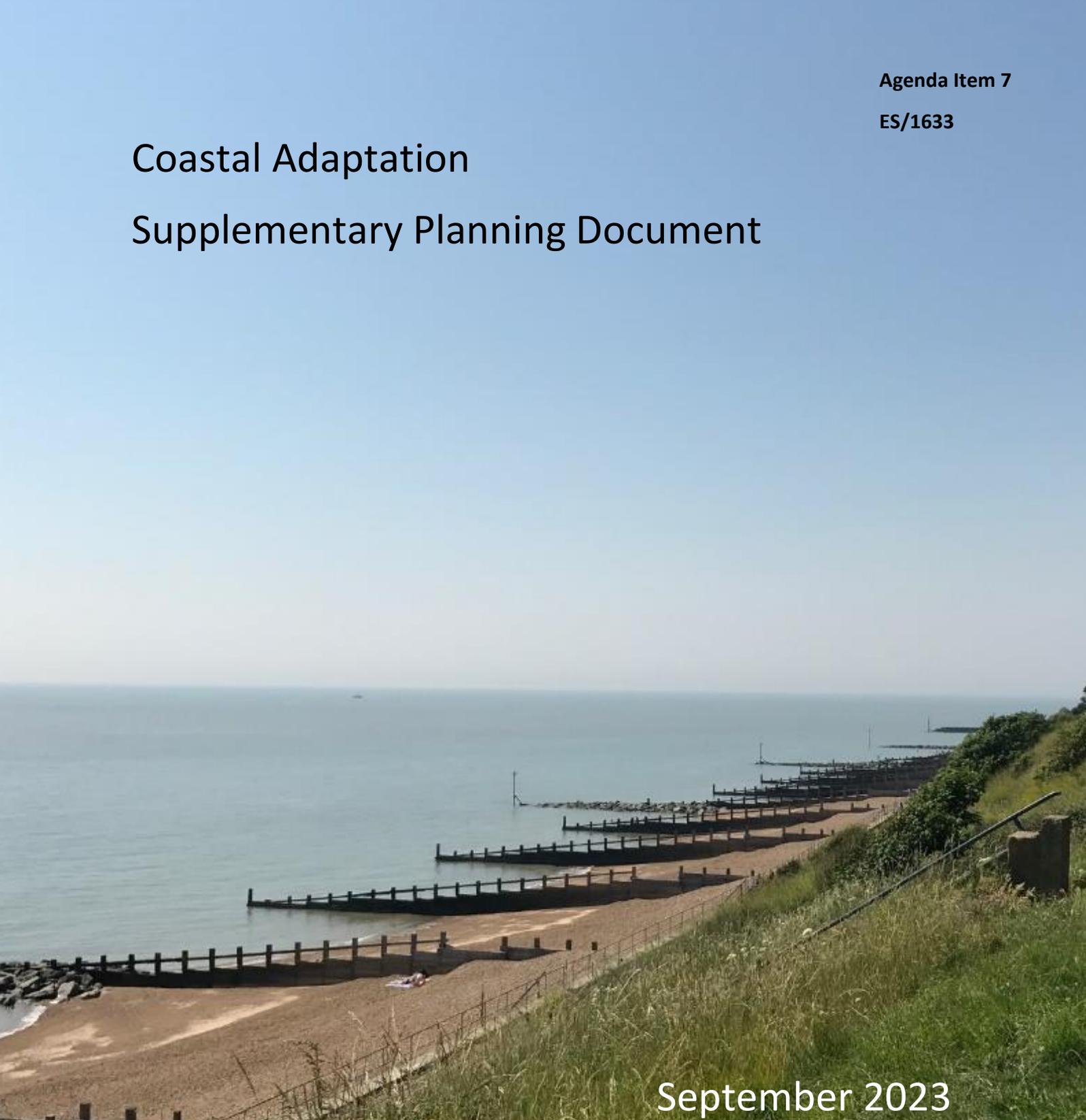
## Appendices

Appendices:	
<b>Appendix A</b>	Final Coastal Adaptation Supplementary Planning Document (the Coastal Adaptation SPD)
<b>Appendix B</b>	Consultation Statement (August 2023)
<b>Appendix C</b>	Strategic Environmental Assessment Screening Opinion (October 2022) (produced to accompany consultation on draft Coastal Adaptation SPD)
<b>Appendix D</b>	Habitat Regulations Assessment Screening Statement (October 2022) (produced to accompany consultation on draft Coastal Adaptation SPD)
<b>Appendix E</b>	Equality Impact Assessment Screening Opinion (October 2022) (produced to accompany consultation on draft Coastal Adaptation SPD)

**Background reference papers:**

<b>Date</b>	<b>Type</b>	<b>Available From</b>
March 2019	East Suffolk Council- Waveney Local Plan	<a href="https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/">https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/</a>
September 2020	East Suffolk Council- Suffolk Coastal Local Plan	<a href="https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/">https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/</a>

# Coastal Adaptation Supplementary Planning Document



September 2023



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# 1 Introduction

1.1 The Coastal Adaptation Supplementary Planning Document (SPD) has been prepared by a partnership of East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority (The Broads), and the shared Coastal Partnership East team<sup>1</sup>. The purpose of the SPD is to provide guidance on the implementation of local plan policies along the coast from Holkham in Norfolk to Landguard Point, Felixstowe in Suffolk. The SPD achieves this by providing guidance on:

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

1.2 The SPD cannot:

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

1.3 The SPD does not:

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

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

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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

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

- 1.5 While this document provides useful guidance for a range of scenarios it will not be possible to address the complexity of issues in every scenario. As with all coastal related development projects, early engagement with the local planning authority and Coastal Partnership East will always be encouraged to maximise opportunities and manage risks to life and property in a timely manner.

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

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

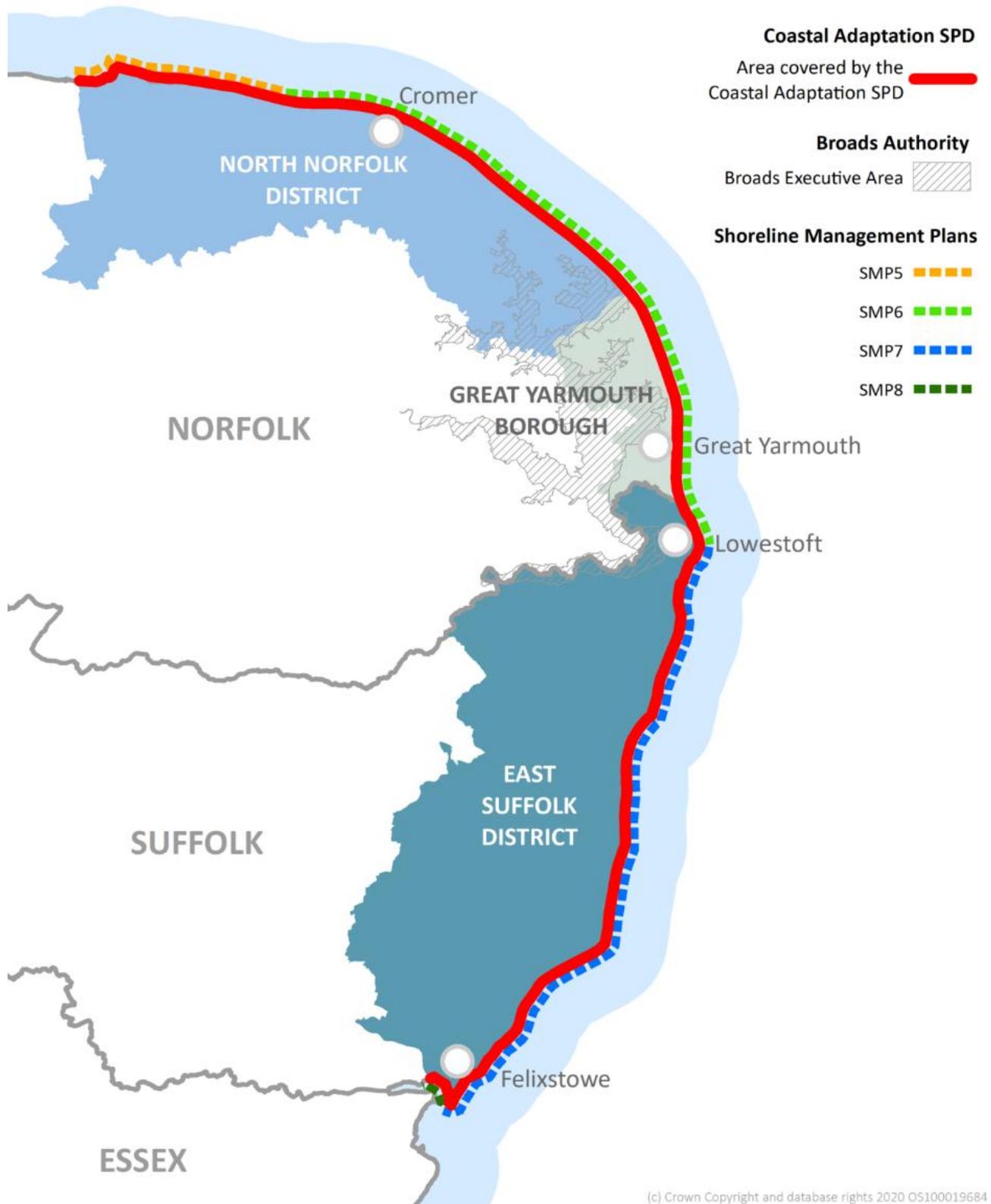


Figure 1 - The area to which the SPD applies

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

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

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

### What are the coastal processes and geology affecting the coast?

2.2 The geology of this stretch of the Norfolk and Suffolk coast can be traced back to the Cretaceous Period, with the oldest chalk dating to approximately 140 million years old. The underlying geology is today covered by glacial sands, silts, clays and gravels deposited and shaped through the action of ice and meltwater over the past 2 million years. Over the last 10,000 years following the last ice age, the sea level has risen and the East Anglian coast, as is recognisable today, was formed.

2.3 The coast is prone to erosion through natural processes such as storms, surges and high levels of ground water, resulting over thousands of years in continued changes to the coast. While these changes predominantly lead to erosion of the coast, there are areas where accretion (gain of land through the deposition of sediment) occurs, which can present a variety of challenges and opportunities for coastal communities, and the environment. Coastal processes are natural processes driven by geology, tides, weather and climate change that affect the coast in a variety of ways.

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

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

2.5 Large areas of the coast and inland coastal zone are covered by natural and historic environment designations. These designations seek to maintain areas, buildings and structures for the significant contribution they make in respect of natural beauty, heritage, geodiversity, special habitats, and biodiversity, some of which are of national and international importance.

2.6 The historic, cultural, and natural qualities of the coast attract many visitors every year and are an essential part of the successful local and regional economy. Other essential elements of the economy

include agriculture, major ports and smaller harbours that sustain our maritime activities (from local fishing to global trade) and the diverse and growing energy sector, as well as the infrastructure that knits everything together. These benefits taken together make for an attractive place for leisure and recreation, to do business, as well as to live.



Cromer Pier with theatre, refreshments and lifeboat station in rough seas.

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

## How does climate change affect the coast?

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



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

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

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

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

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

- 2.11 Coastal change is complex and there are many additional drivers and uncertainties in the system. These include diverse geology and the interaction of risk management infrastructure with coastal processes (i.e. interruptions in the natural process of sediment supply and movement along the coast). Alongside uncertainties regarding the rates of climate change, predicting coastal change will become more challenging.
- 2.12 Taken together these effects will continue to increase the pressure on coastal communities, natural and historic environments, businesses and infrastructure in the following ways:
- Increased risk to life.
  - Increased risk to property.
  - Increased pressures on coastal risk management measures.
  - Increased risks to protected habitats and species.
  - Increased risk of loss of land for recreational activities.
  - Increased risk of loss of infrastructure.
  - Increased risk of a reduction in economic activity.
  - Increased risk of loss of heritage assets.
  - Increased risk of loss of farmland.
  - Increased costs of emergency response.
  - Increased repair and maintenance of coastal risk management measures.
  - Increased risk of saline intrusion, particularly in agricultural land, and sensitive habitats.
- 2.13 Understanding these complex coastal processes, the socio-economic and environmental benefits that are provided by the coast, and the likely impacts of climate change are integral to devising the most appropriate strategies for the continued long-term management of our coast. An outline of available coastal management measures and policies is set out in the next chapter.

## 3 Coastal Management Measures and Policies

### Introduction

- 3.1 The fundamental principle of risk management and planning policy in coastal areas is that of Integrated Coastal Zone Management (ICZM), which is a process that requires the adoption of a joined-up and participative approach towards the planning and management of the many different elements in coastal areas (land and marine). The partnership authorities have and continue to implement an ICZM approach, as evidenced by the Norfolk and Suffolk Coastal Authorities Statement of Common Ground for Coastal Zone Planning (Appendix 1). As coastal erosion risk management authorities, East Suffolk Council, Great Yarmouth Borough Council, and North Norfolk District Council, are signatories to the Coastal Concordat for England<sup>8</sup>.
- 3.2 This chapter provides an overview of coastal management and planning policy at the national, local and neighbourhood scales. Appendix 2 (Organisation Roles & Responsibilities) seeks to support this chapter and sets out the various roles, permissive powers and responsibilities of the key organisations that engage in coastal management and planning.

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

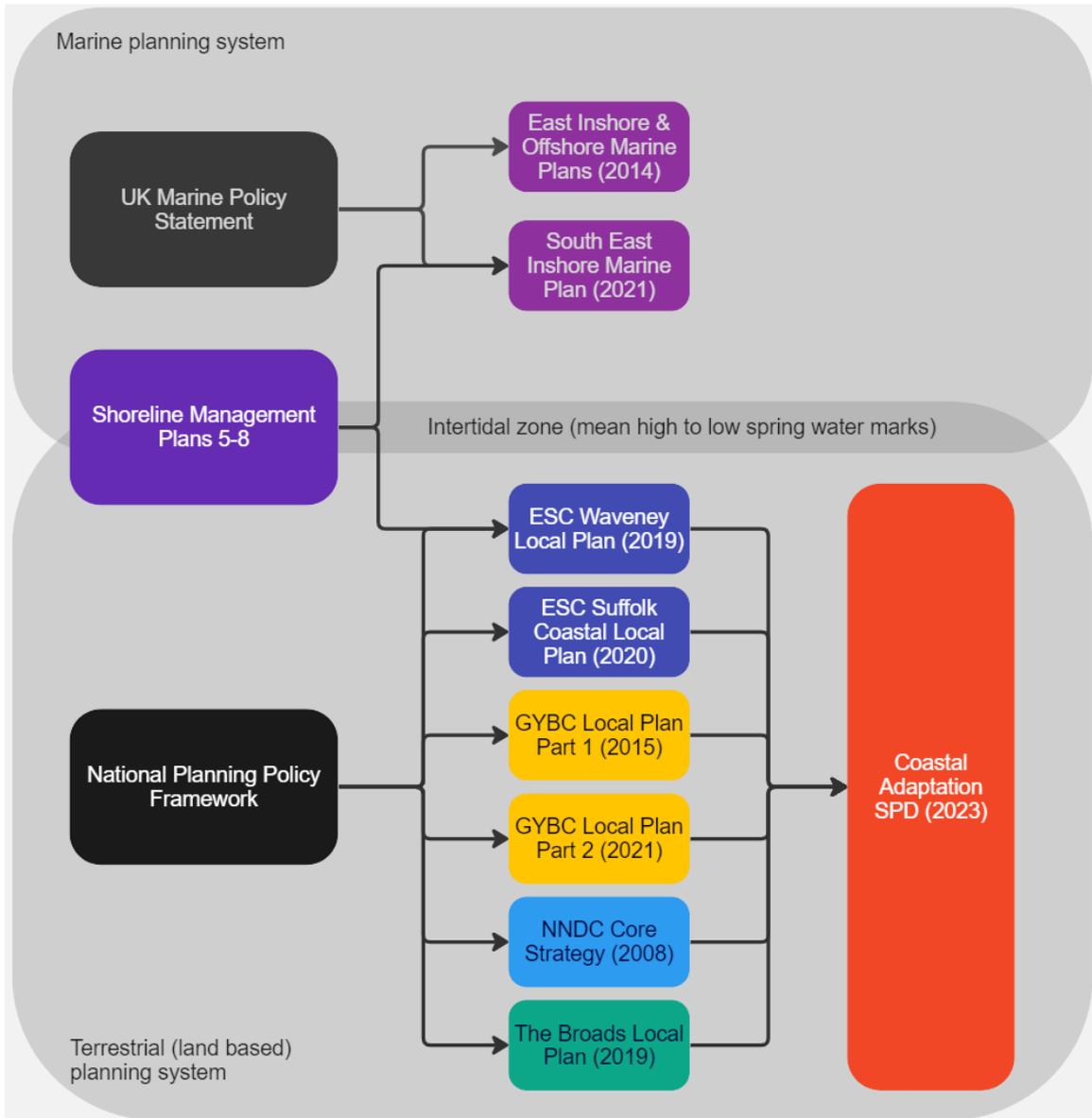


Figure 2: Flowchart showing the relationship between national and local coastal planning and planning related documents<sup>9</sup>

## National Policy and Guidance

- 3.3 The Government’s Flood and Coastal Erosion Risk Management Policy Statement<sup>10</sup> sets out the long-term ambition to create a nation more resilient to future flood and coastal erosion risk, reducing the risk of harm to people, the environment and the economy. The Environment Agency’s Flood and Coastal Erosion Risk Management Strategy<sup>11</sup> provides a framework for guiding the operational activities and decision making of practitioners supporting the direction set by government policy. The key objectives

<sup>9</sup> Once adopted, the emerging NNDC Local Plan will supersede the NNDC Core Strategy 2008

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

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

of both the Government's Policy Statement and the Environment Agency's Strategy are to ensure existing and future places and infrastructure are resilient to coastal change and that everyone understands the risks of coastal change, their responsibilities and how to take action. Clearly set out within both documents is the importance of collaborative working to ensure the key policy objectives are met.

- 3.4 The Environment Agency is a non-departmental public body with a wide range of responsibilities, which includes taking a strategic overview of the management of coastal erosion. This strategic overview role allows the Environment Agency to provide leadership for the management of coastal change including where other risk management authorities have operational responsibilities, thereby helping to facilitate a joined-up approach to tackling coastal erosion risk in a manner consistent with the principles of ICZM.
- 3.5 The ICZM approach is carried into the National Planning Policy Framework (NPPF)<sup>12</sup>, which sets the Government's planning policies at the national level. Local Plans, which set the planning policies for local planning authority areas, must be consistent with the policies set out in the NPPF. Thus, Local Plan policies must be consistent with the Government's ICZM approach.
- 3.6 The NPPF also sets out that Local Plans should manage the risks from development in areas at risk of coastal change. To do this Coastal Change Management Areas (CCMA) should be identified within Local Plans and inappropriate development within CCMA should be avoided. A CCMA is defined as an area likely to be affected by physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion. This SPD covers areas at risk of erosion and coastal landslip.
- 3.7 The Planning Practice Guidance (PPG) for Flood Risk and Coastal Change<sup>13</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>14</sup> is governed by the Government's UK Marine Policy Statement<sup>15</sup> and the Marine Management Organisation's (MMO) Marine Plans. The Marine Policy Statement provides the national framework for the preparation of Marine Plans and decision making affecting the marine environment. Marine Plans provide detailed policy and spatial guidance for an area and help ensure that decisions within a plan area contribute to delivery of UK, national and any area specific policy objectives. The Marine Policy Statement and Marine Plans are managed in an integrated and holistic way, in line with the principles of ICZM. The Marine Plans relevant to the SPD area are:
- East Inshore and Offshore Marine Plans (2014)<sup>16</sup> – covering Flamborough Head to Felixstowe
  - South East Inshore Marine Plan (2021)<sup>17</sup> – covering Felixstowe to West of Dover

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

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

<sup>14</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>15</sup> <https://www.gov.uk/government/publications/uk-marine-policy-statement>

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

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

- 3.9 A marine licence<sup>18</sup> may be required for any relevant developments which may impact the marine environment, such as coastal risk management structures. Section 58 of the Marine and Coastal Access Act 2009 requires local planning authorities to, in carrying out their authorisation and enforcement functions, do so in accordance with the relevant Marine Plan/s unless material considerations indicate otherwise.
- 3.10 The coast is home to a large number of natural and historic environment statutory and non-statutory designations, from large scale Special Areas of Conservation to small listed buildings. These statutory and non-statutory designations are often susceptible to coastal change which can result in loss of part of or all of these assets, or conversely, can be an integral part of their designation as is the case with geologically important cliff features. Natural England and Historic England have important statutory roles in supporting the continued conservation of environmental designations and heritage assets, respectively.

## Local Policy

- 3.11 At the local level there are a range of documents that provide coastal planning and risk management policy and guidance. Local Plans, Shoreline Management Plans, and Neighbourhood Plans are foremost among these. Each of these documents are prepared in order to meet specific, often competing, objectives. Objectives of Shoreline Management Plan policies are<sup>19</sup>:
- Identify opportunities to maintain and improve the environment by managing the risks from floods and coastal erosion;
  - Identify the preferred policies for managing risks from floods and erosion over the next century;
  - Identify the consequences of putting the preferred policies into practice;
  - Set out procedures for monitoring how effective these policies are;
  - Inform stakeholders so that future land use, planning and development of the shoreline takes account of the risks and the preferred policies;
  - Discourage inappropriate development in areas where the flood and erosion risks are high; and
  - Meet international and national nature conservation legislation and aim to achieve the biodiversity objectives.
- 3.12 Objectives of Local Plan and Neighbourhood Plan policies cover the following:
- To increase our resilience to coastal change, helping to protect households and the local economy;
  - To support healthy, safe, cohesive and active communities through improving health, wellbeing and education opportunities for all;

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<sup>18</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/government/collections/marine-plans)

<sup>19</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69206/pb11726-smpg-vol1-060308.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69206/pb11726-smpg-vol1-060308.pdf)

- To achieve diverse and prosperous economic growth;
- To enhance the vitality and viability of town centres and villages;
- To protect and enhance tourism and cultural facilities;
- To enhance and protect the natural, built and historic environment and provide accessible green infrastructure and public open spaces;
- To achieve high quality design;
- To mitigate human impact on the environment and reduce contributions to climate change;
- To deliver new homes; and
- To improve the quality and provision of all types of infrastructure.

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



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

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

<sup>20</sup> [Shoreline Management Plan 5 \(Hunstanton to Kelling Hard\)](#)

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

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

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

this SPD relates. These SMPs form the evidence base for the identification of the CCMA within each of the Partnership Authorities' Local Plans, except the Broads, and are mapped on their respective Local Plan Policies Maps<sup>24</sup>. The three erosion risk areas (short, medium, and long term time periods) that make up the CCMA, the geographical extent of each risk area and the description of the nature of the risk in each area are detailed in the relevant SMP. This information will provide a valuable insight for those seeking to understand the development options for a given area of land.

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



Eroded cliffs at East Runton showing old sea defences.

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

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<sup>24</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>

- East Suffolk Council Suffolk Coastal Local Plan (adopted 2020)<sup>25</sup>
- East Suffolk Council Waveney Local Plan (adopted 2019)<sup>26</sup>
- Great Yarmouth Local Plan Part 1 (adopted 2015)<sup>27</sup>
- Great Yarmouth Local Plan Part 2 (adopted 2021)<sup>28</sup>
- North Norfolk Core Strategy (adopted 2008)<sup>29</sup>
- The Broads Local Plan (adopted 2019)<sup>30</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 SPD is intended to also provide guidance in relation to the emerging North Norfolk District Council Local Plan<sup>31</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, usually undertaken by parish councils and applying to their designated areas. Neighbourhood Plans must be in general conformity with the strategic policies set out in the relevant Local Plan/s and must have regard to the NPPF. The coastal management policies within our Local Plans are strategic policies, and therefore the preparation of Neighbourhood Plans, where they seek to address coastal planning matters, should not be in isolation but act to further support our ICZM approach. More information about neighbourhood planning is available in Appendix 6 (Neighbourhood Plan Guidance) and on the relevant local planning authority website<sup>32</sup>.

## Local Plan policies

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- North Norfolk Core Strategy policy EN11 (Coastal Erosion), the CCMA is referred to as the Coastal Erosion Constraint Area.
- 3.21 While the Broads Local Plan does not identify a CCMA, policy SSCOAST (The Coast) provides a framework whereby operational development in the coastal zone, as identified on the Broads Local Plan policies map, will generally not be permitted unless in exceptional circumstances.
- 3.22 The above policies, except Broads Local Plan policy SSCOAST (The Coast), also require Coastal Erosion Vulnerability Assessments (CEVA) to support relevant planning applications. North Norfolk Core Strategy policy EN11 (Coastal Erosion) does not refer to CEVA by name but does require evidence of the vulnerability of proposed development to coastal change to support planning applications.
- 3.23 The following policies support rollback and relocation of development at risk from coastal change:
- East Suffolk Council Suffolk Coastal Local Plan policy SCLP9.4 (Coastal Change Rollback or Relocation)
  - East Suffolk Council Waveney Local Plan policy WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion)
  - Great Yarmouth Local Plan Part 2 policy E2 (Relocation from Coastal Change Management Areas)
  - North Norfolk Core Strategy policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk).
- 3.24 The Broads Local Plan does not contain a policy regarding rollback and relocation of development at risk from coastal change as there is no development at risk from coastal change along The Broads coast. However, the effects of coastal change on the estuary in the form of permanent inundation is acknowledged and consideration must be given to this risk irrespective of the Local Plan policy context.

## Flood risk

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

## 4 Development in the Coastal Change Management Area

### Introduction

- 4.1 This chapter provides guidance regarding the circumstances in which development may be appropriate within the Coastal Change Management Area (CCMA) across the relevant local authorities<sup>33</sup>. All coastal development proposals should take account of the timeframe of erosion risk across the CCMA. The primary purpose of the CCMA is to identify land that is likely to be vulnerable to coastal change now and in the future across a 100 year timeframe. Incorporating the CCMA into Local Plans supports this purpose with the objective of avoiding inappropriate development and guiding appropriate development within the CCMA.
- 4.2 The collective Shoreline Management Plans (SMPs) for the coast covered by this SPD provide large-scale assessment of the risks associated with coastal erosion and flooding. The SMPs set out the coastal management policy for the short (up to 20 years), medium (20-50 years) and long (50-100 years) term erosion risk areas. This policy framework addresses risks to people and the built and natural environment with the intention of informing policy and planning decisions in a sustainable manner. As such, the emerging and adopted Local Plans of the Local Authorities have used the relevant SMPs as the evidence base to form the CCMA. While the SMP evidence supporting the erosion risk areas, and therefore the CCMA, is robust, it is also important to note the following:
- The rate of coastal erosion (cliff recession rate) will rarely be steady or predictable. The SMP erosion risk areas show the indicative overall extent of erosion for each epoch, but for example, it would be wrong to infer that halfway through a particular epoch the erosion will extend to half of the risk area.
  - In order to effectively manage the inherent unpredictability of coastal change, the following buffer areas (risk zones) have been added to the evidenced erosion risk areas. Within these risk zones a Coastal Erosion Vulnerability Assessment will often be required to support a relevant planning application (as set out in Table 2) and demonstrate that the development will not result in an increased risk to life or property.
    - East Suffolk Council and Great Yarmouth Borough Council apply a 30 metre risk zone landward of areas identified as a CCMA or Hold The Line (HTL) areas in order to ensure that developments take account of the coastal erosion risk in the general vicinity. Within HTL areas the 30 metre risk zone should be measured from the landward edge of the risk management structure.
    - North Norfolk District Council do not apply buffer areas to the CCMA within their adopted Core Strategy. However, their emerging Local Plan applies a 30 metre risk zone

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<sup>33</sup> North Norfolk District Council's existing Core Strategy Policies Map refers to a Coastal Erosion Constraint Area, which is also informed by the relevant SMPs

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

- Through the Suffolk Coastal Local Plan, East Suffolk Council applies a 60m risk zone to the landward edge of risk management structures in areas of soft cliffs where geological information indicates that risk management structures would likely be adversely affected by development. Within the 60m buffer area/risk zone, Coastal Partnership East should be consulted to consider whether a Coastal Erosion Vulnerability Assessment should be undertaken.
- The risk of coastal erosion, relates not only to the action of the sea on the cliff toe, but also to the composition of the cliffs, where a high water content can also contribute to instability, leaving them susceptible to slumping and landslides, irrespective of the nature of risk management structures.
- Erosion risk can also occur outside the CCMA, for example, from wave overtopping, which can result in cliff erosion and risk to life and property, where risk management structures are present.
- The erosion risk areas are likely to be updated during the lifetime of this document and consequently, the CCMA will shift to take account of updated, revised and adopted erosion risk mapping, which takes into account likely climate change scenarios. Any updating of the CCMA will need to be flexible enough to account for instances where new data reflects a greater or lesser risk than previously documented.

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

- 4.3 Each development proposal will have a different level of investment and a different intensity and degree of use, meaning the potential increase of risk to property or life will vary. When referring to the development matrix (Table 1) other considerations, such as the scale of development, its extent, and permanence amongst other matters will be of particular relevance when considering the degree of significance in terms of risk and consequently its appropriateness.
- 4.4 Essential infrastructure requiring a coastal location can be appropriate permanent development within a CCMA provided there are clear plans to manage the impacts of coastal change on it and where it will not have an adverse impact on rates of coastal change elsewhere.
- 4.5 The types of development this can include are:
  - essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk;
  - Essential existing or proposed utility infrastructure which is or has to be located in a risk area for operational reasons, including electricity generating power stations, grid and primary substations and water treatment works that need to remain operational in times of flood;
  - Coastal erosion risk management structures;
  - Wind turbine infrastructure.

4.6 For other development the following criteria can be used as a basis for planning decisions on what may be appropriate:

- **Within Short-term risk areas (up to 20 years time horizon) of the CCMA:** only a limited range of types of development directly linked to the coastal strip, such as beach huts, cafes/tea rooms, car parks and sites used for holiday or short-let caravans and camping may be appropriate. All would require time-limited planning permissions.
- **Within the medium (20 to 50-years) and long-term (50 to 100-years) risk areas of the CCMA:** a wider range of time-limited development, such as hotels, shops, office or leisure activities requiring a coastal location and providing economic and social to the community benefits (the PPG expects these benefits to be substantial)<sup>34</sup>, may be appropriate.
- Existing buildings, infrastructure and land-use subject to the relevant planning permission could adapt and diversify to changing circumstances, where it reduces vulnerability, increases resilience and raises funds to facilitate subsequent relocation.
- Permanent new residential development (including through change of use) will not be appropriate within a CCMA.

4.7 East Suffolk Council, Great Yarmouth Borough Council and North Norfolk District Council have identified CCMA's in their adopted and emerging Local Plans and mapped these on associated Policies Maps, where the respective coastal planning policies set out the principle of development within the CCMA's. An applicant should refer to the relevant:

- Policies Map in order to ascertain in which, if any, of the CCMA risk areas the proposed development site is located;
- SMP to understand the erosion risk on the relevant stretch of coast; and
- Local Plan coastal policies to understand how a planning application would be assessed.

4.8 There are likely to be proposals that do not meet the national policy and guidance or local planning policies, but that could provide new and innovative opportunities to manage the transition in the coastal zone and deliver coastal, environmental and/or social benefits. This is discussed in more detail in the following chapters, but it is imperative that any such proposals be discussed at the earliest opportunity with the relevant Local Planning Authority and Coastal Partnership East.

4.9 Based on the relevant policies in the respective Local Plans, NPPF and PPG, Table 1 provides a high level summary of the suitability of each development type listed in relation to the three SMP risk areas (short, medium and long-term) that make up the CCMA.

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

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



Cliffs at Corton ©Environment Agency, 2011

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

Yes	Development will be acceptable subject to other local plan policies and any material considerations. A planning consent is likely to be subject to appropriate conditions/legal agreement
No	Development will not be acceptable under any circumstances
Possibly	Development may be acceptable subject to the findings of a CEVA. A planning consent is likely to be subject to appropriate conditions/legal agreement

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

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

## **Permanent residential development**

- 4.11 Each of the participating Local Planning Authorities, other than the Broads Authority, have adopted and emerging local plan coastal policies that preclude planning permission for permanent new residential development within the identified CCMA. This also includes any proposals for replacement dwellings and changes of use of other buildings to permanent residential accommodation. For further clarity, this relates to all types of residential use, such as individual dwellings, sheltered housing, student accommodation, hostels, shared housing for disabled people, nursing homes and care homes, residential education and training centres.
- 4.12 If non-permanent residential development/use is being proposed, an applicant should refer to the temporary and time-limited development/uses section.

## **Permanent non-residential development**

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

## **Intensification of use (non-residential)**

- 4.15 Intensification of the use of a building can increase the extent of risk to life, particularly where it is occupied on a permanent basis, but it is unlikely to increase the magnitude of property at risk. Intensification of use could be a means of improving the viability of a use, by securing greater investment in the maintenance of a property, which will be important in helping to counterbalance the degenerative effect of blight associated with coastal change. Proposals for intensification will frequently not need planning permission, but where they do, they will need to be considered in light of the existing risk.
- 4.16 For intensification of the use of properties within the risk zone associated with the first epoch (up to 20 years) to be appropriate, an applicant will need to demonstrate that any increase in risk to life can be mitigated, for example through conditions or legal agreements. Beyond the first epoch, the principle of the intensification of a non-residential use is likely to be acceptable in the context of the existing risk to life, as the increase is likely to be minimal. The degree of control over the occupancy or use of the property may be pertinent, for example, if the proposal involves increasing the occupancy (either through the total number or extending the period of occupancy) of a building that is run or managed as part of a wider business this could pose less of a risk than an independently occupied building.

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

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

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

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

### Temporary development

- 4.20 Temporary development within a CCMA relates to development proposals that require a coastal location and can be granted planning permission for a specific period of time in order to:
- reduce the risk to people and the development by taking account of the assessment of vulnerability; and
  - manage the removal of the development to minimise the impact on the community and on the natural and historic environment.
- 4.21 Development that is temporary (whether by its nature or by limiting its planning consent) is unlikely to constitute an increase in property or life at risk, provided it can be controlled in order to ensure its removal or relocation prior to the erosion risk becoming imminent. Temporary development will often be considered as an appropriate response to coastal change and can help facilitate 'adaptation' to change. Also, as stated in the PPG<sup>36</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 uses include, but are not limited to, use of land for caravans, mobile homes, temporary

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

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

- 4.22 The result of such temporary development could, however, (individually or cumulatively) give rise to positive or negative impacts with regards to the character or viability of a settlement in the longer-term and this would need to be balanced in relation to the longer-term sustainability of that community.
- 4.23 It is difficult to define the lifetime of specific developments here, as each will have different characteristics, be located in a different part of a CCMA and potentially where a site spans across more than one risk area. Applicants would be expected to justify why they have adopted a given lifetime for the development when they are formulating their Coastal Erosion Vulnerability Assessment (CEVA) (see CEVA section). Developers, the Local Planning Authority and the Environment Agency should aim to agree what lifetime is acceptable, having regard to the anticipated impacts of coastal change taking into account climate change. Where the lifetime of the development is prescribed by the time in which coastal change is anticipated to impact on it, the lifetime of the development will be controlled by a specific time-limited planning condition. Such a condition would require the review of the permission in relation to rates of coastal change and ensure the removal of the development prior to the anticipated impact of the coastal change. The condition would also be re-applied to a renewed planning consent, where erosion has progressed at a lower rate than predicted.
- 4.24 The lifetime of a non-residential development depends on the characteristics of that development. Applicants would be expected to justify why they have adopted a given lifetime for the development when they are preparing a CEVA.

### **Open land uses**

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

### **Changes of use**

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

### **Extensions (including householder development)**

- 4.28 Extensions are frequently proposed within a CCMA in order for property owners to be able to meet their changing needs. In areas exposed to coastal erosion risk, a property owner's choices are likely to be restricted by the limited life-expectancy of their building (or its suppressed value as a result of that) making it more difficult to sell or raise funds. The benefit arising from a proposed extension will need to be weighed against any increase in the size of the property or life put at risk and possibly the expected life of the property.
- 4.29 For extensions to properties within the risk zone associated with the first epoch (up to 20 years risk area), an applicant will need to provide information within a CEVA to demonstrate any likely increase in vulnerability, with regards to risk to life and property. Beyond the first epoch it would seem unreasonable to restrict extensions where, in the context of the existing risk to life and property, the increase is minimal. The appropriate test is likely to be whether the proposed extension is clearly subordinate to the existing property or building.

### **Essential infrastructure and community uses**

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

## **Coastal Erosion Vulnerability Assessment (CEVA)**

- 4.32 The purpose of this section is to provide further detail and guidance on the need for and content of a Coastal Erosion Vulnerability Assessment (CEVA). It is important to take a risk based approach to new development in all areas at risk of coastal change. However, this needs to be balanced against the need to help maintain the integrity of coastal communities and businesses. Therefore, it is recognised that some forms of development or land use within the CCMA may be appropriate, providing the long-term aims of supporting adaptation to coastal change can be achieved and it does not add to existing risks.
- 4.33 A Coastal Erosion Vulnerability Assessment (CEVA) will establish whether proposed new development will be appropriate in a given location. The matrix below (Table 2) indicates which development proposals would be expected to prepare a CEVA, the level of detail required in relation to different types of development and in different locations. It is advised that applicants check with the relevant local planning authority to ensure that a CEVA is required for the location of the proposed development and if required, agree the scope of the CEVA with the shared Coastal Partnership East Team.

4.34 As part of the planning process, the CEVA will be checked by the shared Coastal Partnership East Team to ensure that it has been prepared to an appropriate level of detail and is objective in its findings. If this is not the case, the applicant will be advised of where the CEVA needs improvement. On receipt of a compliant CEVA, the shared Coastal Partnership East team will provide a formal response on the application to the relevant planning team. To ensure the preparation of a complaint CEVA with the submission of a planning application, applicants are advised to consider pre-application advice from the relevant local planning authority.

4.35 The purpose of the CEVA is to ensure the applicant:

- is aware of and understands the relevant policies associated with coastal change;
- has demonstrated that the development (including any new and/or altered servicing infrastructure) will be safe through its planned lifetime, without increasing risk to life or property, or requiring new or improved coastal risk management measures;
- has demonstrated that the proposed development (including any new and/or altered servicing infrastructure) will not increase the risk of coastal erosion elsewhere, for example from increased groundwater and surface water run-off, resulting in cliff destabilisation. Infiltration may therefore not be possible or desirable in all circumstances. Early engagement with the Lead Local Flood Authority (Suffolk County Council<sup>37</sup> or Norfolk County Council<sup>38</sup>) and/or relevant surface water drainage expert will be necessary to ensure surface water can be managed without increasing risk to life or property;
- has demonstrated that the development (including any new and/or altered servicing infrastructure) will not impair the ability of communities and the natural environment to adapt sustainably to the impacts of a changing climate;
- has considered the measures for managing the development (including any new and/or altered servicing infrastructure) at the end of its planned lifetime, including any proposals for the removal or relocation of the development before the site is immediately threatened by coastal change; and
- that decisions taken on investment are made with a full understanding of the risks and uncertainties.

4.36 For practical reasons it is difficult to define the lifetime of development as each development will have different characteristics. For guidance, new permanent residential development should be considered for a minimum of 100 years, and non-residential development should be considered to have a lifetime of at least 75 years<sup>39</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.

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

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

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

- 4.37 As a starting point, in attempting to justify a different design lifetime for a non-residential development proposal than that of 75 years, the following non-exhaustive list should be considered:
- the proposed land use/s,
  - whether the development would be permanent or temporary,
  - the vulnerability to coastal erosion of the proposed development, and
  - the ease and speed with which the proposed development could be moved, adapted or demolished.
- 4.38 If the development proposal comprises a mix of uses or different characteristics that would warrant the identification of multiple design lifetimes for elements of the overall development, the CEVA should adopt the longest development lifetime. For example, if a development proposal comprised a mix of permanent residential, retail and office uses, it may be considered that the development lifetime of the retail and office elements would be less than that of the 100 year residential element, perhaps 75 years. In this situation the CEVA should adopt the 100 year lifetime as the lifetime for the whole development proposal. Alternatively, the CEVA could comprise a number of assessments, each evidencing a different design lifetime for a specific element of the overall development.
- 4.39 The detail contained in the CEVA should be proportionate to the degree of risk and the scale, nature and location of the proposed development. Reflecting the requirements of the relevant Local Plan policies, the matrix below (Table 2) indicates which development proposals would be expected to be supported by a CEVA, the level of detail that would be required in relation to different types of development and in different locations.
- 4.40 The Broads has not identified a CCMA within its Local Plan due to their small stretch of coast and its undeveloped nature. The Broads therefore does not feature in Table 2 CEVA matrix for development types.

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

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

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

<sup>41</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 risk management structures are likely to be adversely affected by development.

<sup>42</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.

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

### Level A CEVA

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

### Level B CEVA

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

4.44 It would need to consider the following:

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

4.45 Development proposals within the CCMA will also need to:

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

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

## 5 Rollback and Relocation

### Introduction

- 5.1 Across the SPD area there are a number of residential and commercial properties, as well as businesses, and key infrastructure including roads and pathways, situated within the Coastal Change Management Areas, and at risk from erosion. Coastal change can have a direct effect upon the health and wellbeing and long-term sustainability of affected coastal communities, for example through the erosion and loss of land, to the potential effects emanating from 'blight' and a reduced desire to invest in those properties and the wider area.
- 5.2 In light of these effects upon coastal communities, national policy requires Local Plans to make provision for development and infrastructure that needs to be relocated from Coastal Change Management Areas. Planning Practice Guidance advises that either formally allocating land in a Local Plan, or allowing for relocation where planning permission would normally be refused, are two ways in which this could be achieved.
- 5.3 In response, each planning authority<sup>43</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>44</sup> are set out below:
- East Suffolk Council Suffolk Coastal Local Plan policy SCLP9.4 (Coastal Change Rollback or Relocation)
  - East Suffolk Council Waveney Local Plan policy WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion)
  - Great Yarmouth Local Plan Part 2 policy E2 (Relocation from Coastal Change Management Areas)
  - North Norfolk Core Strategy policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk) and policy CC6 (Coastal Change Adaptation) of the emerging Local Plan.
- 5.5 This chapter provides further detail and guidance on the interpretation of the above policies, such as how land or sites may be identified for rollback or relocation purposes; how such land may be acquired or identified; and how land, which has been vacated, should be managed or utilised in the future to the point at which it is eventually eroded.
- 5.6 It is important to note that the Government does not offer compensation for properties lost as a result of coastal change. Compensation is therefore not a matter which can be considered under planning

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<sup>43</sup> The Broads Local Plan does not include any policies relating to rollback and relocation

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

## Residential land-uses affected by coastal erosion

- 5.7 The timely relocation or rollback of residential dwellings (in other words, well before they are at imminent risk of falling into the sea) is a key aim of the Local Plans, and is also in line with national planning and Defra policy. For this reason, differing weight may be given to some planning policies to help facilitate relocation.
- 5.8 When identifying alternative areas or land to enable sites to rollback or relocate residential properties to, the Local Plans require those alternative areas to be compliant with a number of policy criteria. Whilst some of these criteria are shared by each Local Plan there are some differences, which reflects the nature and purpose of individual plans, and therefore greater interpretation on these matters are explored further below.

### General locational principles

- 5.9 The North Norfolk (EN12) and Great Yarmouth (E2) Local Plan policies are broadly similar in their approach when guiding alternative areas or land to enable sites to rollback or relocate residential properties to. These require sites to be within or adjacent to identified settlements, whilst outside either the Coastal Change Management Area (Great Yarmouth Local Plan) or Coastal Erosion Constraint Area (North Norfolk Local Plan). Whilst the terms ‘identified settlement’, ‘Coastal Change Management Area’ and ‘Coastal Erosion Constraint Area’ are clearly defined within both Local Plans, the term ‘adjacent’ is not. In most circumstances the preference will be for development to share a land boundary with an existing settlement – for example, adjacent to a settlement’s development limits/boundaries – as this helps to maintain a more sustainable form of development and helps to reduce the potential for isolated dwellings in the countryside.
- 5.10 Notwithstanding this preference, the term may also be more flexibly applied in order to take into account the prevailing character or function of each settlement, and in circumstances where it is not possible to share a land boundary e.g., where settlements do not have development limits/boundaries.
- 5.11 Similarly to the Great Yarmouth and North Norfolk Local Plans, the Waveney (WLP8.26) and Suffolk Coastal (SCLP9.4) Local Plan policies also require relocated sites to be located outside of their respective Coastal Change Management Area. Whilst there is no requirement for site’s to be ‘adjacent’ to development limits/boundaries, the policies do permit relocation or rollback outside of settlement boundaries<sup>45</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.
- 5.12 In simple terms this means that in interpreting the policy, the applicant will need to clearly demonstrate that the occupiers of the rollback or relocated dwelling will not be disadvantaged with respect to accessing facilities (e.g. primary school, food shop, bus services, employment opportunities etc) than

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<sup>45</sup> Equivalent term to development limits or development boundary

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

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

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

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

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

### Identifying alternative areas or land

- 5.20 The relevant Local Plan policies are intended to aid coastal business owners and commercial operators to make longer-term decisions about investment and growth. The value of retaining or protecting existing businesses and their employees (and supply chain, as relevant) to local communities can be considerable, in both economic and social terms. For obvious operational and business reasons, however, it will not always be practicable to relocate some businesses to sites outside the Coastal Change Management Area (for example, a tourism business that relies on its seaside location).
- 5.21 For this reason, some types of development will be permitted inside the CCMA (see Table 1 – Development Matrix). Careful consideration of the precise risk in the particular area will need to be undertaken through a Coastal Erosion Vulnerability Assessment (CEVA).
- 5.22 The phasing or timing of relocation can be critical to the success of any rollback scheme. For practical and operational reasons, a relocation may have to be spread over an extended period of time (a caravan site, for example). This can have implications for local communities as it could lead to a longer period of construction (albeit perhaps at a lower level of intensity). At the same time it is recognised that an extended period of time may be needed to help absorb the costs and potential loss of business income before the new site is fully established.
- 5.23 Opportunities to relocate and redevelop within existing site boundaries may also be appropriate. This could include moving buildings away from the cliff edge to vacant land; reconfiguration of the layout of buildings within the site; reusing more vulnerable parts of the site for open land uses or other temporary uses. Therefore, in the short-term risk area, proposals for temporary uses, open land uses, some changes of use and small extensions may be acceptable. In both the medium and long-term risk areas within the CCMA, where the CEVA demonstrates there will be no increased risk to property or people as a result of the development, larger extensions, new buildings and some intensification of use may be permitted. A balance will need to be made between the risk associated with retaining a coastal location and the wider economic benefits for the operator and wider community. Proposals for development that demonstrates that this is the case and that the longer-term coastal risk planning is incorporated, will be supported.
- 5.24 Where relocation to a new site is necessary, this should normally be located where it is accessible (or well-related<sup>46</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 2km away from the existing community and with appropriate highway links for vehicular and non-vehicular traffic. It is recognised, however, that the scale and type of particular businesses may necessitate further flexibility on relocation sites, with decisions being made on a case-by-case basis.
- 5.25 As with residential developments, many potential relocation sites are likely to be within one of the AONBs. Proposed relocation sites will therefore need to consider their potential landscape impacts, in

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<sup>46</sup> As per North Norfolk Local Plan Policy EN11

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

- 5.26 There are some sports grounds and courses which are located on the coast, such as football pitches. Whilst some sports facilities are only for the benefit of their membership, almost all allow visitors and some are available to the public (to hire, for example). Some coastal golf courses are at high risk, as often they are on undefended stretches of the coast.
- 5.27 Golf courses often have a dual role, firstly as a local sporting, leisure and cultural facility – they often have a restaurant, bar and function rooms – and secondly as an important tourist location for golfing societies and golfing holidays. Therefore, it is important to retain golf courses where at all practicable. It may sometimes be possible to create new holes inland to replace those under threat, depending on land availability (and other considerations); this would be supported in principle. Some enabling development might be considered necessary to support the creation of new holes and this is discussed in Chapter 6.
- 5.28 New development should not hinder future realignment of the England Coast Path and should seek to proactively provide future options for realignment of this path and other public access. Other public access (e.g. rights-of-way) should also be considered, including safeguarding/improving existing and relocating/creating new ones, as appropriate.
- 5.29 Where a business or commercial use does not rely on a coastal location as part of its overall business plan, timely relocation to a site outside the CCMA would be supported. Short-term re-use of buildings/land that become vacant may be suitable for alternative uses but will be subject to time-limited planning conditions to manage risk.
- 5.30 To help businesses and commercial uses relocate to alternative sites outside the CCMA, there may be support for the development of mixed-use schemes to assist the viability of new proposals. This could take the form of new residential or retail developments but will be subject to applicants demonstrating that the scheme will not be viable without the inclusion of other forms of development. Additionally, ‘enabling’ development if proven to be necessary will only be permitted on appropriate sites in sustainable locations. This will depend on the specific purpose of the enabling development and considered in the planning balance of other policies in the respective local plans. It would also be expected that any enabling development would only be a small proportion of the new development (see Chapter 6 – public benefits).
- 5.31 The loss of agricultural land to erosion is not compensated financially by the Government. However, some permitted development rights for agricultural buildings and operations exist and these can be used, as appropriate. Where (for example) a barn used to store machinery is at high risk of being lost and it needs to be relocated/replaced elsewhere, in a location at lower risk, this would be given favourable consideration.
- 5.32 Where infrastructure is proposed to be relocated, appropriate consideration should be given to potential relocation alternatives. In some cases, there may be only one main option (perhaps for operational reasons) but in most cases costs and environmental considerations will also be significant. All opportunities to ‘climate-proof’ such relocations as much as possible (i.e. make them resilient to

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



## Habitats affected by coastal erosion

- 5.33 Large areas of the coast which are most severely affected by coastal erosion are also of exceptional importance with respect to rare, endangered or vulnerable natural habitats and species. In particular the coast of North Norfolk, and smaller stretches around Winterton-on-Sea and between Kessingland and Southwold include Special Protection Areas and Special Areas of Conservation. These are defined as sites of highest international importance for birds, flora and fauna.
- 5.34 All of the respective local planning authorities across the SPD area have a statutory duty under the Countryside and Rights of Way Act 2000 to protect these along with other nationally and internationally designated sites.
- 5.35 However, it is not possible to protect all nationally/internationally important habitats and species from the effects of coastal erosion. Natural 'rollback' of habitats is not always possible either (due to the presence of built development, for example) – and there is no requirement to provide compensatory habitat in this context. Identifying/safeguarding any potential habitat rollback land is not within the scope of the SPD to secure/protect, but any such appropriate proposals would be strongly encouraged. New/expanded saltwater marshes may be one such example; inter-tidal and wetland habitats are

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

- 5.36 Development on residential rollback sites may provide opportunities to introduce biodiversity net gain, such as the planting of trees, new heathland etc, which are important in their own right, but they also help to provide greater public benefits to the local community and therefore will be encouraged through proposals.

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

- 5.37 The Local Plans generally expect that any dwellings or buildings that have been vacated on the existing site, due to the imminent risk of coastal erosion, are demolished in their entirety, including all physical remains and materials that form the foundations and services, if there is no agreed temporary use. This is to ensure that no material is left on the site that could result in harm to anyone as a result of cliff fall or environmental degradation. It also ensures that the appearance of the site is left clear and tidy as much of the coast across the SPD area is exposed and set against a backdrop of visually sensitive landscapes including AONBs. However, in many circumstances the removal of below ground structures and services could hasten erosion and may not be safe to complete. Advice should be sought from the Coastal Partnership East team and the local planning authority as to the level of removals required; if removal of structures is not considered practicable, at least they should be made safe/de-connected (or similar). Where materials or below ground structure remain, a monitoring and removal plan (from the beach) may be needed.
- 5.38 Landowners will also be responsible for removing any other structures or vehicles from their land, whether above or below ground, that are subsequently affected by coastal erosion.
- 5.39 The demolition of a building may require planning permission or 'prior approval' from the local planning authority beforehand, therefore advice should be sought from the relevant local planning authority before any demolition work is carried out.
- 5.40 As discussed in the previous chapter, the re-use of existing dwellings for either temporary residential or alternative lower-risk uses (until coastal erosion forces permanent abandonment) may be appropriate and may help to provide households or businesses with some financial assistance to fund the costs of bringing forward alternative rollback sites or help meet the cost of remediating existing sites.
- 5.41 Other grants or financial assistance measures become occasionally available which can also help fund the cost of demolition or remediation, therefore applicants are advised to contact Coastal Partnership East for more information.
- 5.42 Irrespective of the grant or funding model used, planning permissions granted for time-limited uses must include conditions tied to a Section 106 Agreement setting out the future site management and demolition requirements at an agreed date.

- 5.43 There is a requirement through the Local Plans that once cleared, existing sites should be put into a use that is either beneficial for the local community or which can be appropriately adapted to the anticipated change, for example open space or agricultural uses. Whilst each future use will be determined on their individual merits, proposals which help to restore or create habitat will be particularly welcomed. Sites might be able to be transferred to the relevant local authority or parish council, but this would be dependent on private negotiations (on matters like costs and liabilities).

## Acquisition of land for relocation and rollback

- 5.44 There is no single preferred approach when seeking to acquire sites for relocation or rollback purposes as this will ultimately be dependent upon the individual circumstances of the development and/or the business use in question.
- 5.45 In some circumstances local planning authorities may be able to help facilitate developments through a joint venture with the local community, as was the case in the relocation of 9 properties at Happisburgh (see the case study in Appendix 4 for more details). However, such a model remains a developing area and therefore the Local Planning Authorities encourage engagement from and with applicants at an early stage.
- 5.46 Applicants may also wish to consider other ‘longer-term’ routes to establish areas for potential rollback. This could include promoting land for rollback use by working with the local planning authority or parish council during the preparation of their respective Local Plans and Neighbourhood Plans.
- 5.47 Coastal Partnerships East (CPE) secured significant funding from Defra as part of the Flood and Coastal Resilience Innovation Programme<sup>47</sup> (FCRIP), which is running from 2022-2027. CPE will be working with four communities in Norfolk and Suffolk, plus four additional ‘twin’ locations, to deliver adaptation and resilience options which will be applicable more widely. This will include planning, engagement, technical financial and policy tools to support coastal transition.
- 5.48 North Norfolk District Council has been selected to deliver the Coastal Transition Accelerator Programme<sup>48</sup> (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.

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

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

## 6 ‘Enabling’ Development

### Introduction

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

### What is ‘enabling’ development?

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

### Enabling development and coastal adaptation/rollback

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

recognised that enabling development can sometimes be an important element to facilitating the longer-term sustainability of coastal communities. Any proposal considering utilising such an approach should use this SPD guidance and seek further clarification from the relevant local planning authority.

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

## Example scenarios for enabling development

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

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

## Public benefit(s)

- 6.10 Explicit in the consideration of enabling development is that there must be a public benefit or benefits flowing from the whole proposal to provide such a justification. In any planning application this/these will need to be set out, and for that reason, it is considered vital that pre-application advice be sought on particular proposals so that early advice can be received from the relevant local planning authority because every case will, inevitably, be different. The kind of public benefits that may be able to be considered (on a case-by-case basis) are one or more of the following:

### Relocating residential dwellings

- 6.11 It is obviously important that people live in appropriate accommodation, and when a dwelling is lost or can no longer safely exist in its current location due to coastal erosion, the occupants may need to be re-housed on a temporary basis in emergency accommodation (potentially at a cost to the public purse) and/or on a permanent basis (if eligible for affordable housing). Whilst those in market housing would normally be expected to find their own alternative accommodation if not eligible for affordable housing, it is, unfortunately, the norm for home insurance to not cover coastal erosion events.
- 6.12 Therefore, the timely relocation/rollback of dwellings can help avoid or reduce these kind of financial losses (as well as the enormous stress and uncertainties associated with losing a house to erosion). This example is considered a public benefit as there are benefits to maintaining communities and housing stock through the wider effect to the local area and local economy as well as saving costly demolition of the property at a later stage, when it is an emergency situation.

- 6.13 A good example of rollback is the provision of seven plots in an allocated site in Reydon, East Suffolk (Land west of Copperwheat Avenue, WLP6.1). This allocation – which received planning permission in 2022/3 – is for approximately 220 dwellings, and seven plots must be made available for the relocation of properties at risk of (or already lost to) coastal erosion. This is discussed in more detail as a case study in Appendix 4.

### **Relocating tourism accommodation and facilities**

- 6.14 Coastal tourism is a hugely important part of the economy of North Norfolk, Great Yarmouth and East Suffolk, including the Broads. There are many caravan and camping sites and thousands of holiday homes available to rent, contributing hundreds of millions of pounds to the local economy through direct and indirect spending, on meals out, visiting tourism sites etc. Whilst such businesses tend to be privately-owned, they are also a vital source of employment, again both directly (caravan site staff, cleaners etc) and indirectly (from spending in local restaurants and tourism sites, and suppliers of good and services to the sites etc). Allowing the continued use of such sites through rollback/relocation can therefore potentially retain considerable public benefits.
- 6.15 In a similar way to tourist accommodation, coastal facilities specifically geared towards tourism, like amusement arcades and crazy golf courses, or catering to a mixed tourism and local market, like amusement parks and golf courses, generate considerable economic benefits, both directly (from employment) and indirectly (from wider spending). Such facilities can also constitute part of the wider tourism “offer” (of facilities and attractions) of an area. Whilst the direct public benefits may seem less immediately obvious than for, say, caravan parks, they often still exist. Several examples of where caravan and camping parks have been ‘rolled back’ are included in the case studies (see Appendix 4).

### **Relocating business premises**

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

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

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

### **Relocating infrastructure**

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

### **Rollback or creation of natural habitats**

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

## **Enabling development to implement coastal risk management structures**

- 6.20 Communities or businesses may seek to support the implementation of coastal risk management measures along a stretch of coast in order to increase the resilience of properties or assets that are facing or are going to face the impacts of coastal change. In some circumstances to assist with funding these coastal risk management structures, it may be possible to generate funding through enabling development. For example, a residential development outside of the erosion risk zone may be able to generate funds to contribute towards temporary defences in that community. Each circumstance and location will be different and as such early engagement with the planning team and Coastal Partnership East would be required.
- 6.21 Any such measures/proposals would need to be in line with the relevant Shoreline Management Plan policy for that particular location, alongside relevant Local Plan policy considerations.
- 6.22 The public benefit of using enabling risk management measures, including structures to increase resilience of properties will be similar to those set out above.
- 6.23 Any such proposals would need to go through the usual planning process and consider and address such issues as impact on protected sites and any potential to make flooding and erosion worse elsewhere along the coast.

## Lifespan of the proposed development

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

## Viability and enabling development

- 6.28 Any proposal for enabling development must be accompanied by an open-book Viability Appraisal, which must detail the following, as well as be in line with the relevant local planning authority's approach to viability:
- The total estimated cost of demolishing/removing existing development, if appropriate (and returning the site to an acceptable condition, if appropriate)
  - The estimated value of the current site afterwards (which may include continued temporary use)
  - The cost of constructing a replacement dwelling/building/complex/facility, which must include (as appropriate):
    - The total estimated cost of acquiring the land/plot (including any loan interest/mortgage payments)
    - The total estimated cost of constructing the development (building and servicing costs)
  - The estimated value of the new/relocated development after completion
  - An overall assessment of the viability of the relocation/rollback (values minus costs)
  - If there is an asserted shortfall in finances to deliver a viable relocation/rollback, a clear statement of how much the estimated shortfall is and the assumptions behind this
  - In the event of a shortfall, the net value of the enabling development proposed to help finance the relocation. Allowing for an appropriate margin for flexibilities and uncertainties with costs and values, the enabling development sought should not (in scale, size and value) be substantially greater than is required to fund the relocation/rollback.
- 6.29 The proceeds of any enabling development will be required, through a S106 legal agreement (or other legal arrangement) to contribute any necessary 'gap' funding to enable the development to go ahead.
- 6.30 Any Local Plan policies and guidance relating to viability assessments must be followed.

- 6.31 Applicants should be aware that the Local Planning Authorities may use appropriate external expertise when necessary to assess viability appraisals. The independent review shall be carried out entirely at the applicant's expense.

## Enabling development and legal agreements

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

## Key considerations

- 6.33 As well as the potential public benefits, it will be important to consider other impacts, both positive and negative, of the proposal:
- The enabling development is usually expected to be on the same site of the scheme which it is funding. However, this may not always be possible or there may be wider benefits in locating the enabling development elsewhere. The suitability and appropriateness of locating the enabling development elsewhere will be judged on a case-by-case basis. In all cases however, the enabling development will be linked through a legal agreement(s) and/or planning conditions to the scheme it is cross-funding.
  - Where enabling development is proposed to fund new coastal risk management measures the design of any risk management measures should consider all impacts on the natural beauty of the AONBs and on the Broads, SPA, SAC, Ramsar, SSSIs, and other relevant designations.
  - Other local plan policies and adopted SPDs/guides and shoreline management plans will also be of relevance. It is important to note that just because the proposal is for enabling development and the aspects addressed in this section of the SPD may be met, there may be other planning reasons to refuse a scheme. Any departures from policy will be weighed up against the benefits that the enabling development bring.
  - The planning history of the site and any previous use of enabling development will be a consideration.
  - It would also be expected that the viability appraisal produced to accompany applications for enabling development will show that the amount of enabling development proposed is justified.
  - In order to sustain coastal communities, the relocated development and any enabling development should be well-related to the community it was displaced from, where practicable.

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

This statement of common ground is between:

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

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

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

## Background

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

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

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

- A long term view
- A broad holistic approach

- Adaptive management
- Working with natural processes
- Supporting and involving all relevant administrative bodies
- Using a combination of instruments
- Participatory planning
- Reflecting local characteristics

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

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

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

### Shared Aims

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

### Agreed Approach

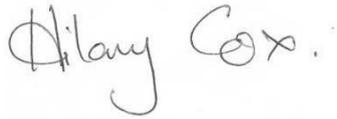
The signatory authorities agree to work together on coastal planning issues to:

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

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



Cllr. Ian Devereux  
Cabinet member for Environment  
Borough Council of Kings Lynn and West Norfolk



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



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



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



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



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



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



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



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



Melanie Vigo di Gallidoro Chairman, Planning Committee 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 (AERFCC)	Regional	Regional Flood and Coastal Committee	Established by the Environment Agency (EA), the AERFCC 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	Local Planning Authority	Prepare Local Plans and Supplementary Planning Documents, support the preparation of Neighbourhood Plans, and determine planning applications.
Coastal Partnership East (CPE) CPE is not an organisation but a shared team across East Suffolk Council (ESC), Great Yarmouth Borough Council (GYBC) and North Norfolk District Council (NNDC)	Regional	Coastal Partnership	CPE is a coastal management team comprised of the partner local authorities of ESC, GYBC and NNDC, whose role it is to carry out the permissive powers, not duties, of the local authorities as Risk Management Authorities/Coast Protection Authorities. CPE therefore as coastal LAs has permissive powers to manage the coast through constructing and consenting new coastal/erosion risk management measures, monitoring changes or repairing and maintaining existing structures. The team also work with the EA, other statutory bodies, AERFCC and EACG to monitor and oversee Shoreline Management Plan policies.
Department for Environment, Food and Rural Affairs (DEFRA)	National	Government Department	DEFRA provides the lead policy role for coastal erosion risk management.
Department for Levelling Up, Housing and Communities (DLUHC)	National	Government Department	DLUHC provides the lead policy role in coastal erosion planning.
East Anglian Coastal Group (EACG)	Regional	Coastal Partnership	Coastal Groups are comprised principally of coastal management officers from district councils, statutory bodies and the EA, with the role of overseeing the preparation and implementation of SMPs, guiding government policy via consultation responses and sharing information and coastal management best practice at the regional and national levels.
East Suffolk Council (ESC)	Local	Coastal Erosion Risk Management Authority / Coast Protection Authority	As a coastal erosion Risk Management Authority and lead authority for SMP7, ESC has responsibilities to prepare, implement and monitor SMPs in conjunction with other organisations, deliver coastal erosion risk management activities, work alongside the EA to develop and maintain coastal erosion risk information. CPE, as the coastal management team for ESC, GYBC, and NNDC, undertake these coastal management responsibilities and permissive powers.

Organisation	Scale	Role	Responsibilities
		Local Planning Authority	Prepare Local Plans and Supplementary Planning Documents, support the preparation of Neighbourhood Plans, and determine planning applications.
Environment Agency (EA)	National	Executive non-departmental public body	The EA is responsible to the Secretary of State for Food, Environment, and Rural Affairs (DEFRA) in England, and as the responsible body for the strategic overview of flood and coastal erosion risk management plays a central role in delivering the environmental priorities of central government. The EA provides a leading and/or supervisory role in the preparation of Shoreline Management Plans. The EA has a strategic overview role for coastal change and provides and maintains flood and coastal risk management structures across large parts of the country.
		Risk Management Authority	
		Statutory Consultee on plan and decision making	The EA is a statutory consultee on the preparation of Local Plans, Neighbourhood Plans, Supplementary Planning Documents and planning applications.
Great Yarmouth Borough Council (GYBC)	Local	Coastal Erosion Risk Management Authority / Coast Protection Authority	As a coastal erosion Risk Management Authority, GYBC has responsibilities to prepare, implement and monitor SMPs in conjunction with other organisations, deliver coastal erosion risk management activities, work alongside the EA to develop and maintain coastal erosion risk information. CPE, as the coastal management team for ESC, GYBC, and NNDC, undertake these coastal management responsibilities and permissive powers.
		Local Planning Authority	Prepare Local Plans and Supplementary Planning Documents, support the preparation of Neighbourhood Plans, and determine planning applications.
Historic England	National	Non-departmental public body	Maintains an advisory role on heritage conservation, for which there are a large number of listed buildings, conservation areas, scheduled monuments, and other heritage designations along the Norfolk and Suffolk coast.
HM Government	National	HM Government of the United Kingdom	Creation of legislation and policy governing the operation of organisations and their roles and responsibilities on the coast.
Local Government Association Coastal Issues and Special Interest Group (Coastal SIG)	National	A special interest group of the national membership body for local authorities in England and Wales	Aims to establish improved governance, management and community well-being to ensure the UK has the best managed coast in Europe. The group is comprised of elected members and officers from coastal Local Authorities.
Marine Management Organisation	National	Non-departmental public body	Responsible for the preparation of Marine Plans and licensing of marine activities, to ensure marine activities such as fishing and the construction of wind farms and ports below the mean high water mark protect the marine environment and coastal communities now and in the future. The East Inshore, East Offshore, and South East Inshore Marine Plans, alongside the UK Marine Policy Statement provide the marine planning framework for the Norfolk and Suffolk coast.
Natural England	National	Non-departmental public body	Maintains an advisory role on nature conservation, for which there are a large number of nature conservation designations along the Norfolk and Suffolk coast.
Norfolk County Council (NCC)	Regional	Lead Local Flood Authority	While NCC maintains responsibilities in respect of their status as the Local Highways Authority, Education Authority, and Minerals and Waste Authority, it is their Lead Local Flood Authority responsibilities that are most

Organisation	Scale	Role	Responsibilities
			relevant to this SPD. As the lead local flood authority NCC has the lead operational role in managing the risk of flooding from surface water and groundwater.
North Norfolk District Council (NNDC)	Local	Coastal Erosion Risk Management Authority / Coast Protection Authority	As a coastal erosion Risk Management Authority and lead authority for SMP6, NNDC has responsibilities to prepare, implement and monitor SMPs in conjunction with other organisations, deliver coastal erosion risk management activities, work alongside the EA to develop and maintain coastal erosion risk information. CPE, as the coastal management team for ESC, GYBC, and NNDC, undertake these coastal management responsibilities and permissive powers.
		Local Planning Authority	Prepare Local Plans and Supplementary Planning Documents, support the preparation of Neighbourhood Plans, and determine planning applications.
Suffolk County Council (SCC)	Regional	Lead Local Flood Authority	While SCC maintains responsibilities in respect of their status as the Local Highways Authority, Education Authority, and Minerals and Waste Authority, it is their Lead Local Flood Authority responsibilities that are most relevant to this SPD. As the lead local flood authority SCC has the lead operational role in managing the risk of flooding from surface water and groundwater.

# Appendix 3 – Coastal Erosion Vulnerability Assessment (CEVA) Template

## Level A CEVA Template

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

Statement:

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

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

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

10. Signed by the applicant: .....

11. Printed Name: .....

12. Date: .....

### Level B CEVA Template

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

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

#### Statement

Please provide detailed answers to the following:

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

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

## Appendix 4 – Case Studies

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

## Broadland Sands Holiday Park Corton, Suffolk

**Planning Reference:** DC/19/ 2949/ COU

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

**Date of Application:** 2019

**Date of Permission:** 2022

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



### Summary

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

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

**Details**

The existing holiday caravans are very close to the cliff edge due to erosion. Earlier consent was given for smaller rollback scheme within the existing holiday park, but a larger area is needed to accommodate future rollback and growth. To accommodate this the site needs to (partially) relocate to a site to southwest on the western side of the Coast Road and adjoining Stirrups Lane. The scheme includes public walking and cycle ways and provision of parking for the church and green spaces with landscaping. Consent by SCC Highways to reduce the speed limit from 60mph to 30mph to allow for safe crossing to the main site and for the safety of pedestrians and cyclist and users of the car park.



**Reflections**

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

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

## Beach Road Car Park, Happisburgh, Norfolk

**Planning Reference:** PF/11/01/69

**Proposal:** Car Park and Ramp replacement

**Date of Application:** 2011

**Date of Permission:** 2011

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



### Summary

As old car park at imminent risk of erosion, new car park developed. No permanent materials used in new car park, designed to be taken up as and when it becomes necessary. Ramp cut into cliff, as ramp erodes away, new ramp is cut into cliff.

### Details

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

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

### Reflections

- The infrastructure needed to be in the risk zone, if planning in the future, consider including longer term relocated access point/rollback location for the car park site in the original application to enable this to be clear and in place when it is required in the future.

## Beach Road, Happisburgh, Norfolk

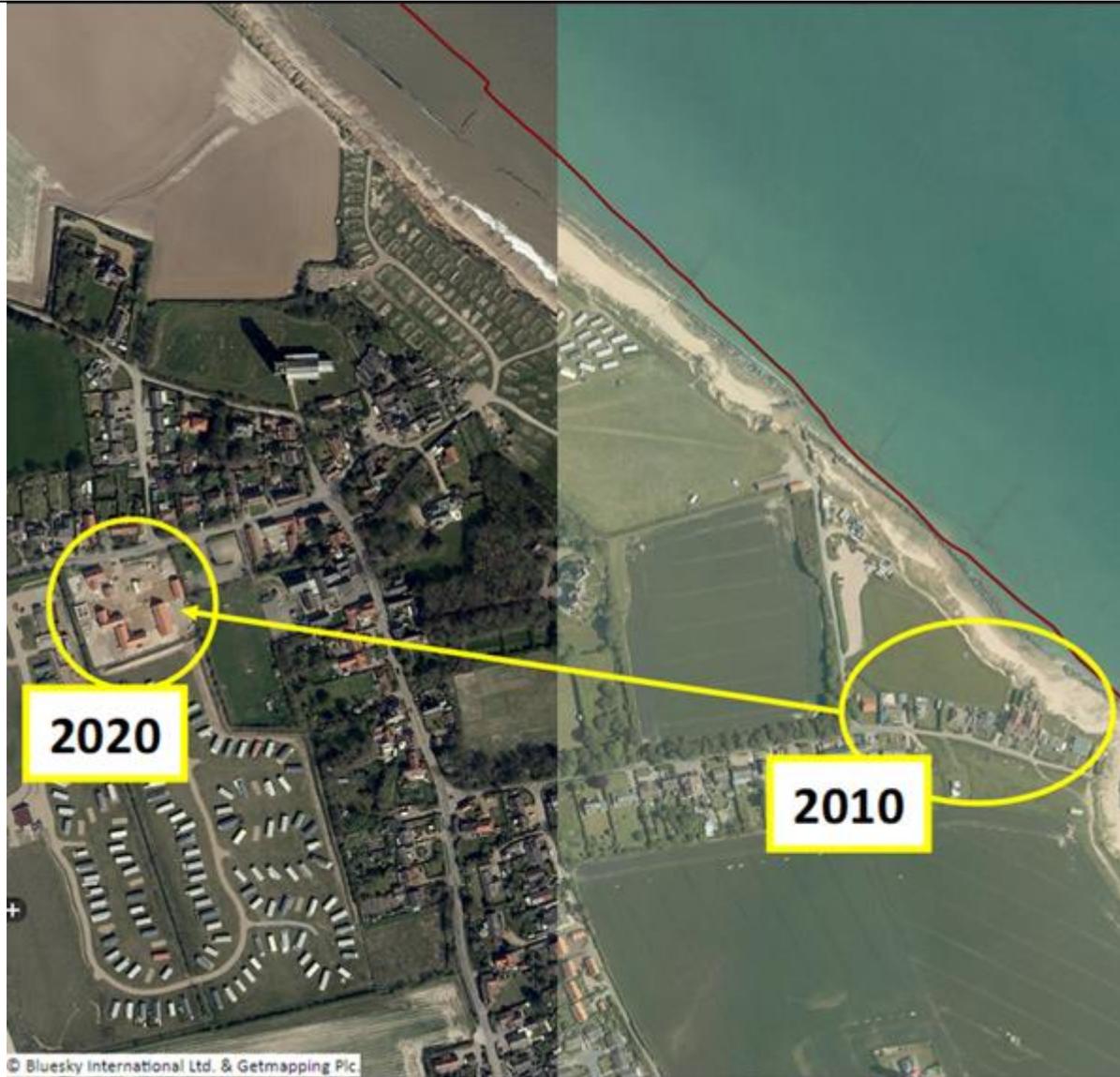
**Planning Reference:** PM/16/0428

**Proposal:** Residential property replacement

**Date of Application:** 2016

**Date of Permission:** 2016

**Link to application:** <https://idoxpa.north-norfolk.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=ZZT68LNMS298>



### Summary

Using government funding, nine properties at short-term (20 years) risk of erosion were purchased by North Norfolk District Council and demolished. These nine properties of equivalent size gained consent on land within the parish but outside the coastal risk zone. The land remained in the ownership of a third party and a legal agreement was arranged between the applicant (NNDC) and the landowner. The land with consent was then sold and developed independently. Consequently, NNDC recouped a third of their costs.

### Details

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

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

#### Reflections

- May be more effective to facilitate owners using their own EN12 opportunity.
- Local Authorities are open to detailed scrutiny in commercial developments, which can be challenging where this may not always chime with wider corporate priorities and aspirations, e.g. social housing provision.
- It is not an easy task to identify suitable development sites where the landowner is willing to sell or come to an arrangement. In this case the developer (NNDC) was fortunate.
- Using the purchase criteria and redevelopment methodology, in this case study, is not cost neutral to the developer (NNDC).
- There was significant local pressure to see at risk properties removed and residents able to relocate, however, there was less appetite for redevelopment in the local area.

## Land West of Little Marl, Trimingham, Norfolk

**Planning Reference:** PF/21/2182

**Proposal:** construction and siting of caravan and garage

**Date of Application:** 2021

**Date of Permission:** 2021

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



### Summary

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

### Details

The applicant had an historic permission to build two bungalows on land within Epoch 2 (indicative erosion up to 2055). One bungalow had been built in 1991, so the permission for the whole scheme remained extant. As an alternative to the second bungalow, the landowner sought permission to

station a caravan on the land and erect a garage instead. Due to the potential loss of land by the impact of coastal erosion, this was seen as a pragmatic approach to the threat of erosion, in line with the preference for adaptation on the coast, given that the caravan would be movable at a future date when it became at risk. After liaising with CPE colleagues, the garage was reduced from double to a single non-permanent wooden garage.

**Reflections**

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

## Easton Lane Easton Bavents, Reydon, Southwold, Suffolk

**Planning Reference:** DC/15/2428/DEM

**Proposal:** Demolition of a pair of semi-detached houses

**Date of Application:** 2015

**Date of Permission:** 2015

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



### Summary

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

### Details

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

### Reflections

- Residential needs to be considered where there are coastal problems – can be addressed within Neighbourhood Plans.
- Reydon Neighbourhood Plan has addressed this via paragraph 7.4 RPC Action 5: Support and Protection For Property at Risk From Flooding or Erosion: In support of this Neighbourhood Plan, the Parish Council will support appropriate planning proposals as may be developed in the future for the relocation of properties at risk from erosion at Easton Bavents and any proposals made in the context of the Shoreline Management Plan to protect housing in areas vulnerable to future flooding.

## Land west of Copperwheat Avenue, Reydon, Suffolk

**Planning Reference:** DC/19/1141/OUT

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

**Date of Application:** 2019

**Date of Permission:** 2021

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



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

### Summary

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

### Details

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

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

The planning application was submitted in 2019 and a resolution to grant permission was reached at the Planning Committee in March 2020 (subject to the completion of a S106 legal agreement)

The Reydon Neighbourhood Plan (RNP) was formally 'made' in May 2021 and so has full weight in the decision-making process from that date. As the permission had not been issued at that point, it had to return to the Planning Committee for re-determination.

One key policy in the RNP (RNP4) requires a planning condition to restrict the use of new open market housing to "principal residences" (i.e. not second or holiday homes).

### Reflections

- The location of the site adjacent to the Suffolk Coast and Heaths AONB required some sensitive landscaping proposals. Securing the 7 rollback plots as part of the allocation (and permission) was key to assisting with tackling the effects of coastal erosion in the local area.
- It remains to be seen whether the plots will be taken up by those who have lost (or will lose) their properties to erosion, but they have the opportunity. The principle having been achieved; it is conceivable that future Local Plans could repeat this process on other sites.

## Seamarge Hotel, Overstrand, Norfolk

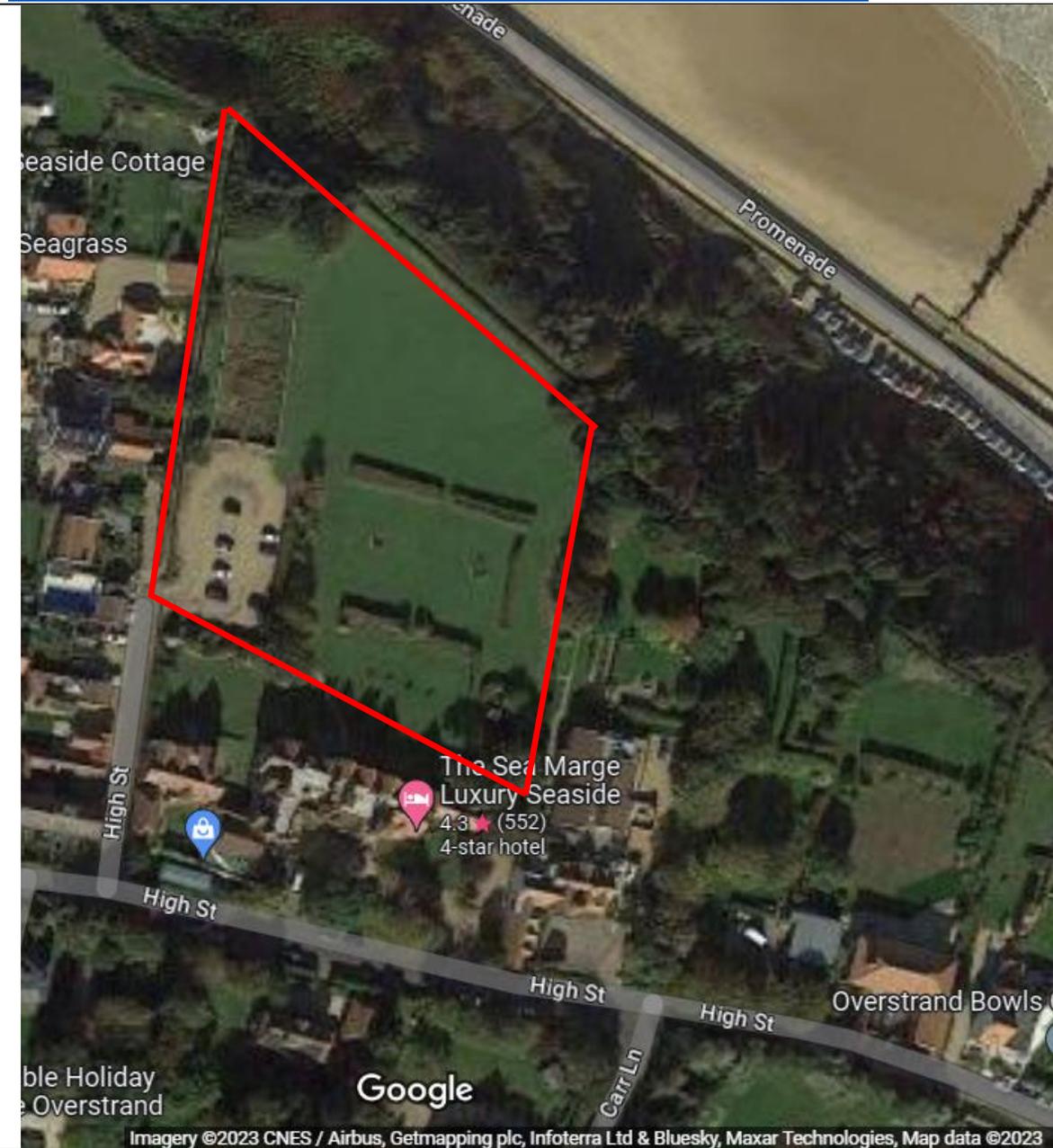
Planning Reference: PF/21/23/77

Proposal: Erection of seven moveable lodges in hotel grounds

Date of Application: 2021

Date of Permission: 2022

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



### Summary

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

Applied for permission to site seven movable lodges in grounds instead of historic permission, and this was seen as a pragmatic approach to the risk of coastal erosion and in line with an adaptation approach.

**Details**

The hotel sits within Epoch 2 (indicative erosion up to 2055). Applicant already had planning permission to build a two storey bricks-and-mortar extension to the rear. Instead, applied for permission to place seven movable lodges in the grounds. This was seen as a preferable approach, due to the risk of coastal erosion; with the limited lifespan of the extension, it would not have been economically viable to build it. However, unlike a bricks-and-mortar extension, the lodges could be moved at the appropriate time. This approach was welcomed as pragmatic, in line with a move towards adaptation.

**Reflections**

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

# Wood Hill Holiday Park, East Runton, Norfolk

Planning Reference: PF/22/0351

Proposal: Rollback of caravans

Date of Application: 2022

Date of Permission: 2022

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



## Summary

The submitted application was for a hybrid rollback scheme, with some caravans being moved to the landward side of coastal site, and others being moved inland to a second site. The application included well-researched supporting documents, including Coastal Erosion Vulnerability Assessment and Flood Risk and Drainage Assessment, and enabling development was also used as part of this application.

## Details

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

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

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

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

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

**Reflections**

- Good use of assessment of coastal risk developed and utilised.
- Some enabling development.
- Long term considered planning with early engagement with the coastal and planning teams developed a high quality and well considered proposal.
- Monitoring and future removal of below ground infrastructure included.

## Manor Caravan Park, Happisburgh, Norfolk

**Planning Reference:** PF/14/0120

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

**Date of Application:** 2014

**Date of Permission:** 2015

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



### Summary

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

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

#### Details

Manor Caravan Park was primarily within the 2025 indicative coastal risk zone (epoch 1) of the shoreline management plan (SMP). Over a number of years, a significant number of static holiday home plots and land had been lost. A temporary consent had been granted to move the most at risk holiday homes onto an adjacent touring area. The holiday park had been identified by the local community as a key asset for the economic vibrancy of the village, with visitors supporting the local public house, shop, post office, etc. As such, NNDC's liaison with the village confirmed there was a desire to ensure the holiday park remained well-connected with the existing village and facilities. North Norfolk District Council provided a business grant to Manor Farm Holiday Park to investigate options to relocate away from the coastal erosion risk zone. These funds were used to complete a site viability assessment including if they may be available. This included landscape visibility assessment as the core part of the village is a conservation area and has a number of listed buildings. Park owner used this information to identify a preferred site by which a private agreement was agreed with the landowner, prior to the submission and application. Although the wider community had expressed a desire for the holiday park to remain in close association with the village, there were a number of objections to the proposed position of the new site. The planning committee refused the application based on the landscape impacts. On appeal by the applicant the application was approved. The new site was prepared, and all assets associated with the holiday park were moved. The original cliff-top site was cleared and remains open cliff-top grassland, providing a buffer between the village and the sea. The site is no longer traditional cliff-top park, with regular rows of holiday homes, it has more landscaped layout including hedges, along with additional planting to improve biodiversity and the visual appearance of the area.

#### Reflections

- Even with significant pre-application work, it does not guarantee a smooth ride with the decision-making process.
- There are challenges across competing constraints and needs when it comes to relocation and reprovision of assets at risk of coastal erosion.
- Where there are perceived landscaping impacts, balance needs to be struck with local economic and community needs and the balance of landscape improvements with asset removal from the coast must be considered.
- Where there is a need and a desire, it is possible to relocate whole businesses to make them sustainable and to reduce erosion risk into the future.

## Corton Pathfinder Scheme, Suffolk

Planning Reference: N/A

Proposal: N/A

Date of Application: N/A

Date of Permission: N/A

Link to application: N/A



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

### Summary

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

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

### Details

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

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

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

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

#### Reflections

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

Report on the Corton Pathfinder project can be viewed here:

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

## Appendix 5 – Example Conditions

### Temporary Planning Permission

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

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

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

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

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

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

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

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

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

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

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

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

## Surface Water Drainage

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

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

## Relocated Dwellings

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

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

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

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

**Condition:** Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 no building or structure permitted by Classes A (extensions or alterations), B (changes to the roof) or E (buildings or enclosures within the curtilage of the house) of Schedule 2 Part 1 of the Order shall be erected without the submission of a formal planning application and the granting of planning permission by the local planning authority.

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

## Relocated Development

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

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

## Change of Use

**Condition:** The [building/land] shall be used only for [ ] and for no other purpose whatsoever, (including any other purpose in Class [ ] of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended)) or in any provision equivalent to that Class in a statutory instrument revoking and re-enacting that Order with or without modification.

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

## Appendix 6 – Neighbourhood Plan Guidance

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

- National Planning Practice Guidance for Neighbourhood Planning<sup>49</sup>
- Locality guidance for neighbourhood planning<sup>50</sup>
- Local planning authority guidance (East Suffolk Council<sup>51</sup>, Great Yarmouth Borough Council<sup>52</sup>, North Norfolk District Council<sup>53</sup>, and The Broads<sup>54</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:

- Allocate land for (re)development in less vulnerable locations, providing plots to residents and businesses at greatest risk (for guidance on rollback and relocation, see chapter 5). If such plots were developed as self or custom build dwellings, they would benefit from Community

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

<sup>50</sup> <https://neighbourhoodplanning.org/>

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

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

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

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

Infrastructure Levy (CIL)<sup>55</sup> exemption where applicable, which would support the viability of relocation.

- Allocate land for (re)development in less vulnerable locations to help fund the introduction and maintenance of coastal risk management structures.
- Develop a vision, derived from community engagement, to help identify opportunities for activities on the coast within the CCMA. The vision could help to identify and support changes of use to uses less vulnerable to coastal change, potentially including both temporary and permanent development opportunities on the coast, as well as opportunities to support habitat creation, rollback and relocation.

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

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

## Appendix 7 – Glossary

### A

#### **Area of Outstanding Natural Beauty (AONB)**

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

### C

#### **Coastal accretion**

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

#### **Coastal adaptation**

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

#### **Coastal change**

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

#### **Coastal Change Management Area (CCMA)**

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

#### **Coastal erosion**

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

#### **Coastal processes**

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

#### **Conservation area**

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

#### **Climate change**

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

### D

#### **Development plan**

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

## E

### **Enabling development**

Development contrary to planning policy, but which would secure a particular public benefit/s that would warrant departing from policy. It usually concerns development that would financially support development which would otherwise be unviable.

### **Erosion risk areas**

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

## G

### **Geodiversity**

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

## H

### **Heritage asset**

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

### **Highway authority**

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

## I

### **Integrated Coastal Zone Management (ICZM)**

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

## L

### **Lead Local Flood Authority**

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

### **Local plan**

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

### **Local planning authority**

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

### **Listed building**

A building identified for its special architectural or historic interest.

## **M**

### **Marine plan**

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

## **N**

### **Neighbourhood plan**

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

## **P**

### **Planning history**

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

### **Permanent inundation**

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

## **R**

### **Ramsar site**

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

### **Relocation**

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

### **Risk management structure**

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

### **Rollback**

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

## S

### **Section 106 agreement (S106)**

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

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

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

### **Special Area of Conservation**

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

### **Special Protection Area**

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

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

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

## T

### **The Partnership**

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

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**North Norfolk District Council**  
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**Planning Policy Team**  
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**Great Yarmouth Borough Council**  
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01493 846270  
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This document is available in alternative formats and in different languages on request. If you need support or assistance to help you read and/or understand this document, please contact the Council using one of the methods above.

# Consultation Statement

## Coastal Adaptation Supplementary Planning Document

September 2023



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## 1. Introduction

The Coastal Adaptation Supplementary Planning Document (SPD) provides guidance on the coastal adaptation planning policies of the following Local Plans:

- East Suffolk Council
  - Suffolk Coastal Local Plan (2020)
  - Waveney Local Plan (2019)
- Great Yarmouth Borough Council
  - Local Plan Part 1 (2015)
  - Local Plan Part 2 (2021)
- North Norfolk District Council
  - Core Strategy (2008)
- Broads Authority
  - The Broads Local Plan (2019)

Once adopted the Coastal Adaptation SPD will replace the following documents:

- ‘Coastal Erosion and Development Control Guidance’ (2009) covering North Norfolk District Council, and
- ‘Development and Coastal Change SPD’ (2013) covering the former Waveney area which now forms part of East Suffolk Council.

The Partnership of local planning authorities and the shared Coastal Partnership East team (the Partnership) has followed the approach to engagement as established in the Statement’s of Community Involvement adopted by each authority. At the start of preparation of the SPD the 2014 East Suffolk Council Statements of Community Involvement were in place (covering the former Waveney and Suffolk Coastal districts). East Suffolk Council has since adopted a new Statement of Community Involvement in April 2021 which applies to the consultation on the draft SPD. While preparing the Coastal Adaptation SPD the Partnership has consulted with relevant organisations and members of the public. Details of this consultation process are set out below.

An initial stage of consultation was held for 6 weeks between 4 September and 16 October 2020. A formal consultation on the draft SPD was held for 6 weeks between 25 January and 8 March 2023.

This Consultation Statement was first produced under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) to accompany the consultation on the draft SPD and has subsequently updated to reflect the consultation responses received during that consultation.

## 2. Who was consulted?

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

### **Initial consultation**

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

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

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

### **Consultation on the Draft SPD**

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

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

### 3. How were they consulted?

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

#### Initial consultation

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

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

Hard copies of the document were made available free of charge by post by contacting the Planning Policy and Delivery team as the usual locations for viewing documents were closed to the public, due to the Covid-19 pandemic.

The consultation was advertised via the Partnership's respective social media accounts (see Appendix 2).

The consultation sought responses to the following questions:

1. Do you consider the scope and proposed content of the Supplementary Planning Document to be appropriate?
2. Are there any elements of National or Local Planning Policy which should be particularly emphasised/explained in the SPD?
3. What guidance for development in the Coastal Change Management Area should be identified in the SPD?
4. Are the categories identified in section 3 appropriate and comprehensive or should others be identified?
5. What guidance on temporary development within the CCMA should be included?
6. What elements should be included within a Coastal Erosion Vulnerability assessment?
7. What guidance on Roll-back and relocation options should be included?
8. What guidance on enabling development should be included?
9. What case studies should be used in this SPD to demonstrate coastal adaptation best practice?
10. Do you have any other comments which could help the partnership prepare the SPD?

In total 63 individuals and organisations responded to the consultation. Between them they made 288 comments, as presented in the table in Appendix 3. The consultation responses can also be viewed on the East Suffolk Council website at [Responses to the Consultation - Coastal Adaptation Supplementary Planning Document Initial Consultation - East Suffolk Council, Strategic Planning Consultations \(inconsult.uk\)](#).

#### Consultation on the Draft SPD

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

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

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

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

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

## 4. What were the main issues raised?

### Initial consultation

A summary of the main issues raised through the initial consultation is as follows.

1. Do you consider the scope and proposed content of the Supplementary Planning Document to be appropriate?
  - The SPD should change the planning policies concerning the coast as set out in Local Plans.
  - The SPD should change the approach to management of the coast as set out in the Shoreline Management Plans (SMP).
  - The SPD should address flood risk as well as coastal erosion risk.
  - The SPD should recognise the importance of the natural and historic environment along the coast and the benefits these environments provide communities and businesses.
  - The SPD should provide guidance relating to public have access at the coast and countryside.
2. Are there any elements of National or Local Planning Policy which should be particularly emphasised/explained in the SPD?
  - The SPD should explain the difference between terrestrial and marine planning.
  - The SPD should explain the difference between local plan and SMP policy.
  - The SPD should explain the difference between local plan and national policy.
  - The SPD should refer to the Government's national policy statements on various topic areas.
  - The initial consultation document was hard to understand for those that do not already understand coastal planning jargon.
  - The SPD should provide guidance helping to explain how coastal planning policies will apply to different types of development.

- The SPD should recognise the importance of natural and historic environment and that enabling development, and rollback and relocation development must consider the natural and historic environment, and avoid impacts on such environments.
  - Guidance should be provided on the implementation of flood risk policies.
3. What guidance for development in the Coastal Change Management Area should be identified in the SPD?
    - The SPD should protect buildings and other assets on the coast from being lost to the sea.
  4. Are the categories identified in section 3 appropriate and comprehensive or should others be identified?
    - The SPD should provide guidance relating to the various risk zones added to the CCMA.
  5. What guidance on temporary development within the CCMA should be included?
    - Some suggested temporary development shouldn't be allowed, and others suggested temporary development should form part of a sustainable approach to development on the coast.
    - Some confusion about what would constitute temporary development.
  6. What elements should be included within a Coastal Erosion Vulnerability assessment?
    - There was some confusion as to the role of Coastal Erosion Vulnerability Assessments.
  7. What guidance on Roll-back and relocation options should be included?
    - The SPD should provide information concerning funding sources and compensation for rollback and relocation development.
    - The SPD should provide guidance on the nuances of planning applications for rollback and relocation to ensure policy compliant planning applications are submitted.
  8. What guidance on enabling development should be included?
    - A number of local, national and international coastal adaptation best practice case studies were suggested to be explored.
  9. What case studies should be used in this SPD to demonstrate coastal adaptation best practice?
    - A number of case studies were suggested ranging from locally specific coastal adaptation schemes (such Wood Hill, East Runton rollback and relocation of holiday park lodges), to local schemes for wildlife conservation and habitat creation, large scale energy projects, to coastal adaptation approaches of other nations.
  10. Do you have any other comments which could help the partnership prepare the SPD?
    - The open ended nature of this question resulted a large number of comments covering a large variety of topics and issues, most of which cannot be addressed by the SPD.

### **Consultation on the Draft SPD**

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

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

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

## Appendix 1: Consultation bodies

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

### Specific consultation bodies

- Environment Agency
- Historic England
- Marine Management Organisation
- Natural England
- Network Rail
- National Highways (at the time Highways England)
- Norfolk County Council
- Suffolk County Council
- Parish and town councils within East Suffolk, Great Yarmouth, North Norfolk, and The Broads and neighbouring parishes
- Neighbouring Local Planning Authorities
- Elected members
- Anglian Water
- Water Management Alliance
- Essex and Suffolk Water
- Homes England
- NHS England
- Ipswich and East Suffolk Clinical Commissioning Group
- North Norfolk Clinical Commissioning Group
- Great Yarmouth and Waveney Clinical Commissioning Group

### General consultation bodies

- Voluntary bodies some or all of whose activities benefit any part of the SPD area
- Bodies which represent the interests of different racial, ethnic or national groups in the SPD area
- Bodies which represent the interests of different religious groups in the SPD area
- Bodies which represent the interests of disabled persons in the SPD area
- Bodies which represent the interests of persons carrying on business in the SPD area

### Other individuals and organisations

Includes local businesses, high schools, individuals, local organisations and groups, planning agents, developers, landowners, residents and others on the combined mailing list.

## Appendix 2: Initial consultation social media posts

Example provided by the Broads Authority and East Suffolk Council:

**Broads Authority**  
@BroadsAuth

A new consultation on the Coastal Adaptation Supplementary Planning Document has been launched today, running until 16 Oct.

At this early stage, we welcome comments from anyone who has an interest in the coast or may be affected by changes to the coast.

[broads-authority.gov.uk/about-us/how-w...](https://broads-authority.gov.uk/about-us/how-w...)

Coastal Partnership East and 3 others

14:55 · 04/09/2020 from Earth

**East Suffolk Council Planning**  
@east Suffolkplan

Initial consultation on the Coastal Adaptation Supplementary Planning Document ends Friday 16 October. Please let us know your views [eastsuffolk.inconsult.uk/consult.ti/coa...](https://eastsuffolk.inconsult.uk/consult.ti/coa...)

17:33 · 08/10/2020 · Twitter Web App

## Appendix 3: Initial consultation responses

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

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

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

Respondent	Comment	Partnership Response	Changes Made
	<p>very little of it managed. I would suggest a more clear interaction with SMP. For example will there be a closer examination of the need to defend parts of the coast where the SMP says nothing should be done. Will the resources be available to manage the coastline properly or is the intention just to let everything go?</p>	<p>application of Local Plan policies regarding coastal adaptation.</p>	
<p>Norfolk County Council - Natural Environment Team (Catherine Dew)</p>	<p>We support the Coastal Adaptation Supplementary Planning Document and have the following comments for consideration. The SPD seems to focus on the human impacts. It should also include the ‘natural environment’ – the habitats and species which form the coastal (and marine) environment as the management measures and policies will impact on them and the ecosystem services and recreational use, they provide. They are inextricably linked.</p>	<p>Support welcomed. The SPD will seek to provide guidance on the implementation of coastal planning policies. The SPD will set out the affects that coastal processes and policies can have on coastal ecology (and vice versa), and identify ways in which such impacts can be lessened and ways in which coastal adaptation can best serve the needs of the natural environment.</p>	<p>The SPD emphasises the impacts of coastal processes and planning policies on the natural environment, and provides guidance on ways in which such impacts can be lessened through coastal adaptation.</p>
<p>Blue Sky Leisure (Paul Timewell)</p>	<p>BSL consider the scope and broad of the document to be broadly appropriate. The document should identify the range of business operating along the coast and acknowledge their significant importance to the North Norfolk and wider Norfolk economy, particularly tourism. It should explain that all businesses are different , both in type and size, and the SPD should not treat all business as the same, with certain business such as tourism having very different needs in terms of how planning policy should be applied.</p> <p>The SPD provides the opportunity to introduce some flexibility into the application of Planning Policy dependent on the nature of activity affected. For instance, in terms of the application of the roll back policy, the site requirements for a caravan and camping site are vastly different to a manufacturing business. The SPD should explain the material considerations that could be considered as being appropriate to justify a variation in</p>	<p>The SPD will within its context chapter, set out the affects that coastal processes and policies can have on local businesses, and it is recognised, as stated, that there are a wide variety of different businesses operating on or close to the coast.</p> <p>The SPD cannot introduce ways of interpreting policy, that is the role of the development plan. The SPD will, however, provide guidance on how policy should be applied and some flexibility may be appropriate in certain cases</p> <p>The SPD will present case studies of coastal adaptation best practice. It is not considered necessary to include details of emergency cases:</p>	<p>The SPD sets out the benefits of roll back schemes against the impacts.</p> <p>Appropriate pre-application engagement should be undertaken, but the Local Plans already mention this</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>planning policies dealing with coastal adaptation. It could for example, explain the 'trade offs' that may be acceptable when considering the benefits of roll back schemes against the impacts. The SPD could usefully provide advice on the expectations for public engagement where roll back schemes are proposed.</p> <p>The SPD could usefully include case studies of schemes that are considered exemplars of a successful implementation of coastal adaptation planning policies. The SPD should set out the likely planning response in cases of emergency, for instance where unpredicted/accelerated coastal erosion means businesses have to make rapid reactive decisions as to how best to deal with such circumstances.</p>	<p>these will always be dealt with in a case-by-case basis</p>	
<p>Norfolk County Council - Lead Local Flood Authority (Sarah Luff)</p>	<p>The LLFA have reviewed the Draft SPD Initial consultation document scope and consider the scope and content are appropriate.</p>	<p>Support welcomed.</p>	<p>No change.</p>
<p>Felixstowe Town Council (Ash Tadjrishi)</p>	<p>We agree with the content topic proposed, but believe the wider public would be well served by a section overtly specific to Sea Level Rise, and what an appropriate level may be relevant to be taken into account over a 100 year time scale. We note the figure currently used by the Environment Agency as general guidance is of the order of 0.7m over 100 years.</p>	<p>National Planning Practice Guidance for 'Flood risk assessments: climate change allowances' provides guidance relating to sea level rise, amongst other things. As national guidance can be updated quickly, it is considered more appropriate for sea level rise to be addressed by national guidance and the Environment Agency rather than this SPD.</p>	<p>No change.</p>
<p>J E Blanchflower</p>	<p>Broadly speaking yes, but the SPD will need to be flexible enough to respond to climate change initiatives, many of which have not been devised or enacted. Perhaps the scope should be widened to encompass this.</p>	<p>Coastal change is inherently linked to climate change, and the SPD will seek to provide case study examples of coastal adaptation best practice.</p>	<p>No change.</p>
<p>Andrew McDonald</p>	<p>I am not sure if this is not a statement of the obvious, but perhaps the definition of context in para 1 could be expanded from 'Homes, businesses and communities' to</p>	<p>The SPD will within its context chapter, set out the affects that coastal processes and policies can have on the natural environment.</p>	<p>The SPD sets out the impacts of coastal processes and planning</p>

Respondent	Comment	Partnership Response	Changes Made
	include the environment and biodiversity of the CCMA? Action taken by way or rollback and especially by relocation will inherently offer a threat to areas hosting the relocation, and this should be explicit from the outset. I suggest also that the significance of climate change is not sufficiently reflected in the decision to make coastal change 'inclusive' of climate change, and no doubt the detailed document will address this.	It is recognised that coastal change is inherently linked to and affected by climate change, and the SPD will seek to provide case study examples of coastal adaptation best practice.	policies on the natural environment.
Burnham Overy Parish Council (Sarah Raven)	This has been sent to Burnham Overy Parish Council for recommendations however it only covers half the coastline. Why is this only suitable for this part of the coast from Holkham to Felixstowe?	The SPD covers the coastal areas of North Norfolk District Council, Great Yarmouth Borough Council, The Broads Authority, and East Suffolk Council (the area that the Coastal Partnership East team covers) – but not King's Lynn and West Norfolk, which has its own arrangements. Adjoining parish councils to the SPD area have also been consulted, however, as is standard practice.	No change.
Peter Terrington	More emphasis needed on development in areas of accretion.	The SPD will provide guidance in relation to development within and affecting the CCMA, including areas of accretion, erosion and where the shoreline is reasonably stable.	No change.
Peter Terrington		N/A	N/A
Southwold Town Council (Lesley Beevor)	Scope: section 2 should summarize current mitigation policies, especially in context of those areas where policy is hold-the-line as at Southwold.	The SPD will include a summary of the powers bestowed on coastal authorities and our partners (such as the Environment Agency) as well as policies to manage the coast, including mitigation policies.	No change.
Anglian Water Services Ltd (Stewart Patience)	Consideration should also be given to existing infrastructure located within the area covered by the SPD as follows: • water and water recycling infrastructure provided by Anglian Water and • existing infrastructure including ports within the area and energy generation	The SPD will provide guidance relating to the implementation of coastal planning policies, which will be relevant to existing and planned infrastructure at the coast.	No change.
Barton Willmore (Will Spencer)	NFOWF Ltd supports the objectives for producing the SPD, as identified in Section 1 of the Consultation Document. This includes helping coastal communities to prosper and	Support noted. The SPD does not wish to restrict appropriate development at the coast. However, certain development types will normally be	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>to adapt to coastal change, but to also provide detailed guidance on the interpretation of policies with a whole coast approach. Our client also welcomes and agrees with the statement that the SPD will not: • Create new or amend existing planning policies as this is the role of the Development Plan and National Policy, or • Alter the approach to the management of the coast as this is the role of SMPs.</p> <p>Notwithstanding the above, Section 4 of the Consultation Document states that the SPD will “provide clear guidance as to what development may be appropriate in such areas and in what circumstances”. NFOWF Ltd urges the exercise of caution in the way this statement is interpreted into the draft SPD. There is a risk that an overly restrictive policy will conflict with both of the above objectives and could result in certain development being excluded from certain areas without sufficient evidence to demonstrate that that it would be inappropriate. This should not be the role of planning policy, but rather it should be for developers to make applications for development in an area and for these to include assessments of the impacts on coastal processes and to justify why the proposal is suitable in the area (with regard to proposed mitigation and monitoring measures). To do otherwise could threaten the delivery of developments such as the Project as well as the achievement of national and local policies for increasing the supply of renewable sources of energy and addressing the impacts of climate change. Should the SPD identify the types of development suitable in certain areas (as in the Waveney Development and Coastal Change SPD 2013) then it should state that renewable energy infrastructure should be supported where there is a proposed</p>	<p>inappropriate within the CCMA and this will be set out within the SPD. The policies for determining planning applications will be those of the Local Plan, and any planning application must be treated on its own merits, but the SPD will provide useful advice on how the Local Plan policies will be applied.</p>	

Respondent	Comment	Partnership Response	Changes Made
	management plan to address potential impacts on coastal processes.		
Bidwells (Kate Hammond)	Looking at the 5 points of the SPD, we believe it covers most areas of Coastal change, however, we would like to see more emphasis on traffic management and road infrastructure which is not specifically mentioned with in the summaries. This is vital especially between Sidestrand and Mundesley where coastal erosion is accelerating and will have a huge impact on the existing road infrastructure.	The SPD will provide guidance relating to the implementation of coastal planning policies, which will be relevant to existing and planned infrastructure at the coast, including highways.	No change.
RSPB (Ian Robinson)	<p>Nature conservation interests are frequently combined with built development under the general heading of ‘development’. In order to provide clarity, we suggest where management for interests other than built environment exist, they are categorised and treated separately. This would therefore result in targeted discussions about predicted coastal change impacts on e.g. biodiversity, water and soils as discrete features that could be affected separate from residential properties and commercial and industrial interests.</p> <p>The impacts of each topic area may have similarities but there will also be variation. This would also then lend itself to additional assessments that will need to be undertaken to demonstrate that the proposed SPD will not adversely affect the integrity of terrestrial and marine Natura 2000 sites, as well as other national important sites. This will also enable reference to specific guidance within the National Planning Policy Framework (NPPF) e.g. paras 118, 157.</p> <p>The mitigation hierarchy for developments needs to be clearly set out, emphasising the mitigation and compensation requirements that should be considered. Any mitigation and compensation packages must be based</p>	<p>The SPD will within its context chapter, set out the affects that coastal processes and policies can have on the natural environment.</p> <p>The terminology used within the SPD will categorise the built environment and natural environment separately so as not to underplay the important role of the natural environment and the ways in which it is affected by changes to the coast, whether they be natural or built.</p>	The SPD sets out the impacts of coastal processes and planning policies on the natural environment.

Respondent	Comment	Partnership Response	Changes Made
	<p>on the ecological requirements for the species and habitats affected and may need to consider options for compensation some distance from the point of impact to ensure the most sustainable options are identified. The SPD must also highlight the opportunities for net gain for biodiversity and the environment to be a consideration in coastal adaptation projects.</p> <p>The role that adaptive coastal management plays in maintaining functional coastal habitats needs to be highlighted and the benefits of these habitats for wildlife conservation, flood prevention and in the context of saltmarsh, carbon sequestration. Providing carbon budgets for each proposed option would enable an assessment of sustainability to be made. Proposals should be developed describing creation of compensatory habitat along the coast in response to losses elsewhere. For example, coastal squeeze in the Deben estuary is resulting in unfavourable SSSI condition due to loss of saltmarsh. In areas where managed realignment/no active intervention is the accepted course in the Shoreline Management Plan, this saltmarsh could potentially be restored in a different location, preventing net loss of habitats and potential for overall net gain.</p>		

**2. Are there any elements of National or Local Planning Policy which should be particularly emphasised/explained in the SPD?**

Respondent	Comment	Partnership Response	Changes Made
esc (beavan)	building in flood plains	The SPD will focus on coastal planning policies, and although flooding can be a coastal issue, the policies governing flood risk are not solely coastal matters. This SPD will therefore not address policies concerned solely with flood risk, other than where	No change.

Respondent	Comment	Partnership Response	Changes Made
		they may affect coastal management and adaptation policies.	
Stu Precious	It's a cop out to just cite existing documents and not summarise the existing policy.	The initial consultation gave respondents the opportunity to influence the proposed content of the SPD. After taking account of consultation responses the Partnership Authorities will draft and consult on the draft SPD.	No change.
Paul Johnson	There is a general feel that the Policy recognises that change is inevitable, and that it is not taken very seriously. The scope appears to be reactive rather than proactive and could be read, as I did, to be investigative, research worthy and able to produce conclusions that have sadly, no teeth. I see little in the document that suggests it will achieve very much - I hope I am wrong and missed something innovative and supportive to those who are closely linked to the coastal strip, both business and leisure.	This SPD will ensure planning guidance is up to date, aid the interpretation and delivery of planning policy, and provide case study examples of coastal adaptation best practice. The SPD cannot create new or amend existing planning policies as this is the role of the Development Plan and national policy.	No change.
Jeffrey Hallett	Long term effects of building Sizewell C and similar future developments. Impact of the many (7) planned offshore energy projects that need infrastructure to come onshore and then have depots, works or power transfer cables etc passing through your countryside with no inter-agency cooperation to mitigate the cumulative effects.	The impacts of specific infrastructure projects will not be discussed, other than where they relate to case studies of coastal adaptation best practice. The SPD will, however, provide guidance relating to implementation of coastal adaptation planning policies.	No change.
Margaret Hallett	The likely long-term effect of the Energy companies planning developments.	The impacts of specific infrastructure projects will not be discussed, other than where they relate to case studies of coastal adaptation best practice. The SPD will, however, provide guidance relating to implementation of coastal adaptation planning policies.	No change.
North Norfolk District Council (Harry Blathwayt)	Roll Back or managed retreat must be emphasised regarding compensation.	Financial "compensation" is not available in roll-back or managed realignment scenarios, but the possibility of any forms of "compensation" (which might perhaps include the right to a plot of land inland in some cases) will be discussed in the SPD.	No change

<b>Respondent</b>	<b>Comment</b>	<b>Partnership Response</b>	<b>Changes Made</b>
Tessa Aston	The continued protection of Landguard Fort, Landguard Common and Cobbold's Point and the Martello Tower at Manor End.	The SPD cannot alter the approach to the management of the coast as this is the role of SMPs.	No change.
Lindsay Frost	Laws governing the littoral zone and offshore areas	The SPD will set out, briefly, the powers bestowed upon coastal authorities and our partners that can be used to manage the coast. The SPD is based upon the principles of Integrated Coastal Zone Management and as such the Partnership Authorities will explore the potential inclusion of laws governing the marine planning system within the SPD.	No change.
Richard Starling	Before doing this consultation, you should await the outcome of the Broadland Futures Initiative. We have very little information on National yet alone Local Planning Policy at this stage and the BFI consultation would have, hopefully, explained this.	This SPD and the Broadland Futures Initiative (BFI) operate within the same topic area, that of coastal change. However, the SPD is very much focussed on providing guidance relating to the implementation of existing planning policies, whereas the BFI is looking to inform the overarching flood risk management strategy for the next 100 years over a much wider area. The SPD and BFI can complement each other, and the SPD need not be restricted by the timings of the BFI.	No change.
Martlesham Sea Wall Group (Thomas O'Brien)	I would like more emphasis on the value of the coast to local communities and tourists for enjoyment. Rather than the public seen as purely a 'disturbance'. See my comments in 10 below.	The SPD will set out the importance of the coast to communities, businesses, and the environment.	No change.
Norman Castleton	I would like to see how this SPD extends or clarifies the criteria and definitions already agreed in the SMPs.	The SPD will provide a glossary of terms but cannot amend definitions set out in the SMPs.	The SPD will contain a glossary of key terms.
Norfolk County Council - Natural Environment Team (Catherine Dew)	The SPD should incorporate the forthcoming Nature Recovery Networks and consideration should be given to re-creating habitats and enabling habitat and species migrations.	The SPD will, set out the affects that coastal processes and policies can have on the natural environment, and also provide guidance relating to habitat creation and enhancement in the context of rollback and relocation approach to coastal adaptation.	No change.
Blue Sky Leisure (Paul Timewell)	An important part of the SPD should be to provide more detailed guidance on the necessary nuances of the	The SPD will provide guidance relating to the implementation of rollback and relocation policies,	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>implementation of Local Plan roll back policies and explain how policies will be applied to different type of businesses. As explained above, what might be an appropriate approach to dealing with the relocation of a tourism business will be different to the approach for manufacturing, particularly in terms of site requirements, location, and attractiveness to visitors. The SPD could explain the expectations for options appraisal, in terms of application of the roll back policies and acknowledge that different business will need a differing site requirement. The SPD should provide guidance and advice on timing/phasing expectations for the implementation of coastal adaptation policies, acknowledging that it may only be viable and practical to implement policies over an extended time period.</p>	<p>and include guidance relating to different uses. While it will be important for the SPD to provide as much useful guidance as possible, it will also be important to balance this with the need to provide concise guidance and allow for flexibility in demonstrably unique circumstances.</p>	
<p>Norfolk County Council - Lead Local Flood Authority (Sarah Luff)</p>	<p>a. The National Policy Statement on Flood Risk and Coastal Change Management should be included within this section as it is expected to strongly influence the policy direction over the coming years. b. Please confirm whether this section will make links to appropriate flood risk policy whether the coastal erosion lead to a change in flood risk?</p>	<p>The SPD will include the National Policy Statement for Flood and Coastal Erosion Risk Management when setting out the policy framework relating to coastal adaptation.</p> <p>The SPD will focus on providing guidance relating to the implementation of coastal planning policies, and will therefore not provide much guidance relating to flood risk.</p>	<p>No change.</p>
<p>Felixstowe Town Council (Ash Tadjrishi)</p>	<p>The governance of Coastal Management, let alone with the inclusion of Adaptation, is complex and very hard for lay people to understand. We believe a section should be included explaining the core principles – as clearly and briefly as possible. E.g. Coastal Management, and as part of that Coastal Adaptation, have emerged as concepts over the past 15 years or so, replacing previous separate approaches for “Flood Protection” in respect of areas liable to tidal flooding and separately “Coast Protection” – protecting higher coastal land from loss by erosion. Land</p>	<p>The SPD will include information relating to the legislative and policy framework for coastal management, as well as a glossary of terms to help explain some of the planning and coastal management jargon often used.</p>	<p>The SPD will contain a glossary of key terms.</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>use planning had traditionally been a separate topic. Four strands of law and regulation cover those issues, with Responsible authorities being: • Flood protection: The Environment Agency (EA) • Coast Protection: District &amp; Unitary LAs, as Coast Protection Authorities (CPAs), under the 1949 Coast Protection Act • Planning; District &amp; Unitary LAs, as Local Planning Authorities (LPAs). • Marine ecology and management (the MMO) Within the Planning section, reference should be made to: • The relevant NPPF sections, particularly paragraph 160(b) – “Developments should be safe for their lifetime.” (our perception of some recent planning applications has been that too much reliance has been given to the sequential test in isolation, without the over-riding “safe” factor of 160(b) • Shoreline Management Plans and their role as a non-statutory evidence base, including the meaning, with examples, of the 3 policy options. Links to relevant documents: NPPF, SMP, role of Estuary and other flood plans.</p>		
J E Blanchflower	<p>Preservation of fragile and diminishing coastal habitats such as salt marshes by strengthening Local Planning Policy to prevent damaging development of any kind (public and private) or activities (e.g. dredging) in areas which are vulnerable or nationally designated. Emphasising the importance of up to date guidance from expert bodies on the long term effects of proposed changes/developments. Planning applications can take a long time between submission, consideration and approval and the coastline may have changed in the interim period, given the acceleration of climate change and extreme weather patterns.</p>	<p>The SPD cannot create or amend planning policy, or provide guidance relating to policy wholly in the marine realm. The guidance contained in the SPD will, we hope, ensure that applications are supported by robust evidence and have been prepared in a manner that can then be more speedily determined.</p>	No change.
Lowestoft Cruising Club (David Bennett)	<p>Not able to comment on the National Planning policies, as not familiar with them. All local East Suffolk Council relevant planning policies should be emphasised and explained.</p>	<p>The SPD will provide guidance relating to the implementation of coastal adaptation policies.</p>	No change.

<b>Respondent</b>	<b>Comment</b>	<b>Partnership Response</b>	<b>Changes Made</b>
Andrew McDonald	The recently extended Suffolk Coasts and Heaths AONB, and the very wide range of protected and designated landscape in East Suffolk, are critical to the life of Suffolk communities, and it would be helpful if the recognition of the importance of Heritage Coasts and AONBs in paras 170-173 of the NPPF is reflected in the SPD, as should be the underlying regulation in the Countryside and Rights Of Way Act 2000. It would also be helpful to note the emphasis on long term planning in the Coastal Management section of the recently adopted Local Plan, especially para 9.39.	The SPD will within its context chapter, set out the affects that coastal processes and policies can have on the natural environment. The long term approach to coastal management, as mentioned within paragraph 9.39 of the Suffolk Coastal Local Plan, will be emphasised within the SPD.	No change.
Peter Terrington	NN: EN 7 & 8	It is assumed the comment relates to policies of the North Norfolk Core Strategy. The SPD will provide guidance relating to the implementation of coastal adaptation policies contained in the North Norfolk Core Strategy, as well as other Development Plan documents across the SPD area.	No change.
SCEG - Scratby and California Environment Group (Lodge)	Adaption options.	The SPD will provide guidance relating to the implementation of coastal adaptation policies.	No change.
Southwold Town Council (Lesley Beevor)	No Comment.	N/A	N/A
Water Management Alliance (Jessica Nobbs)	Paragraph 163 from NPPF allowing development in areas that meet the required criteria with regards to flood risk – push for sustainable development (even though coastal focused). Strong links also need to be made to the tidal estuarine systems critical to catchment scale long term spatial planning. Water Framework Directive, Habitats Directive duties to the environment.	The SPD will focus primarily on guidance relating to the implementation of coastal adaptation policies. However, guidance relating to other policy frameworks may be included where appropriate.	No change.
Deben Estuary Partnership (Christine Block)	The SDP, as set out, omits any reference to a significant element of the Suffolk coastline – the estuaries of the Deben, Alde and Ore and Blythe. Factors influencing change within an estuary cannot be separated or isolated from	The SPD cannot alter the approach to the management of the coast as this is the role of SMPs, and neither can the SPD create new or amend existing planning policies as this is the role of the	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>coastal systems. In acknowledging, as the draft SPD states, that coastal change can be (but is not limited to) erosion, land slip, permanent inundation, or accretion it follows that it is necessary to accept that estuaries (where rates of change, taking account of climate change, may be significant over the next 100 years), are likely to be affected by most, if not all, of the physical changes listed. With particular reference to the Deben Estuary – here both the estuary mouth, influenced by the variable configuration of coastal shingle banks, and the management of defences within the lower reaches of the estuary will be affected by storm surges, damage to and breaching of defence walls and extensive flooding. In order to deliver a coherent, holistic approach to coastal and estuarine management it is therefore necessary to include estuaries within the coastal change management area policy – as set out in the NPPF- Policy, as set out in the National Planning Policy Framework, requires the delineation of the Coastal Change Management Area to be informed by, amongst many other things, Estuary Plans. It is the intention of the Council to expand the boundary and principles of Coastal Change Management Areas to the estuaries of the plan area in order to fully address coastal change along the Suffolk coastline which, by law, extends to the mean low water mark in the estuaries.</p>	<p>Development Plan and National Policy. However, the SPD will provide guidance relating to the implementation of coastal adaptation planning policies.</p>	
<p>Anglian Water Services Ltd (Stewart Patience)</p>	<p>This section should also refer to powers available to adapt the coast, either in line with the Shoreline Management Plan (SMP) or through any subsequent reviews of the SMP to enable additional growth.</p>	<p>The SPD will set out the powers bestowed upon coastal authorities and our partners that can be used to manage the coast, including through the preparation and review of Shoreline Management Plans.</p>	<p>No change.</p>
<p>Barton Willmore (Will Spencer)</p>	<p>The SPD should acknowledge the Overarching National Policy Statement (NPS) for Energy (EN-1) and the NPS for Renewable Energy (EN-3), in terms of the support given to the need for renewable energy infrastructure, including</p>	<p>The SPD will provide guidance relating to the implementation of coastal adaptation planning policies. The SPD will not provide guidance relating to the implementation of National Policy Statements, as</p>	<p>No change.</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>offshore wind. NPS EN-1 states for example: “The UK needs all the types of energy infrastructure covered by this NPS in order to achieve energy security at the same time as dramatically reducing greenhouse gas emissions. It is for industry to propose new energy infrastructure projects within the strategic framework set by Government. The Government does not consider it appropriate for planning policy to set targets for or limits on different technologies. The IPC [now the Secretary of State] should therefore assess all applications for development consent for the types of infrastructure covered by the energy NPSs on the basis that the Government has demonstrated that there is a need for those types of infrastructure and that the scale and urgency of that need is as described for each of them in this Part...” As noted above (under The Project) the policies in the relevant NPS are the principal considerations in the decision-making process for DCO applications, which could mean departures from other policy is justified in certain circumstances. This includes in respect of ‘Enabling Development’ to deliver certain public benefits which is addressed in more detail in the response to Question 8 below.</p>	<p>these relate to the Development Consent Order (DCO) procedure and not to planning applications for which the Local Planning Authority is the determining body.</p>	
<p>Bidwells (Kate Hammond)</p>	<p>As commented above we consider that road re-alignment and traffic management should be properly considered within this document. Existing businesses rely on the existing highway network and therefore this should be properly considered and protected. We consider there should be more emphasis on other development options where land and property are lost or at risk of being lost in the future.</p>	<p>The SPD will provide guidance relating to the implementation of coastal adaptation planning policies. The SPD will not create new or amend existing planning policies as this is the role of the Development Plan and National Policy.</p>	<p>No change.</p>
<p>RSPB (Ian Robinson)</p>	<p>The Statement of Common Ground Shared Aims states: • A holistic and “whole coast” approach will be taken; this recognises coastal change is an inevitable part of a dynamic coast. A naturally functioning coastline is desirable in</p>	<p>The SPD will set out the affects that coastal processes and policies can have on the natural environment, and also to provide guidance relating to habitat</p>	<p>The SPD will set out the importance of the natural environment and the impacts of coastal processes</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>principle but may not be appropriate in every location. • To protect the coastal environment, including nature conservation designations and biodiversity. In Waveney Development and Coastal Change SPD (which is to be replaced by this new SPD): • Although not always possible to replace habitat lost as a result of coastal erosion, the Local Planning Authority will endeavour to protect sites from development that could provide opportunities to recreate habitat close to existing sites. The NPPF makes mention in para 166 of the need for Integrated Coastal Zone management. Within the relevant Shoreline Management Plan's (SMPs) (5, 6 and 7) the style and presentation of information for options is very different making it difficult to assess the connectivity between SMP plans and areas. For example, the importance of longshore drift resulting from cliff erosion. How far the impact of this movement of minerals extends isn't explained and as such how important adopting an option say in SMP 6 is to SMP 7 isn't immediately obvious. Equally, NPPF para 157 and para 163 describe the need to ensure flood risk doesn't get shifted to another location. This is an important consideration given the dynamic nature of this stretch of coast and needs to be appropriately captured in the SPD.</p>	<p>creation and/or enhancement in relation to rollback and relocation coastal adaptation implementation.</p> <p>The SPD will not alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs).</p>	<p>and planning policies on the natural environment.</p>
The British Horse Society (Charlotte Ditchburn)	Yes	Comment noted.	No change.

**3. What guidance for development in the Coastal Change Management Area should be identified in the SPD?**

Respondent	Comment	Partnership Response	Changes Made
Stu Precious	<p>This exercise seems to be a box ticking exercise. You have not given any clear information and have deliberately obfuscated, to put people off. This is a very serious issue concerning many livelihoods and also SSSI/RAMSAR</p>	<p>The initial consultation gave respondents the opportunity to influence the content of the SPD. After taking account of consultation responses the Partnership Authorities will consult on the Draft SPD.</p>	<p>No change.</p>

Respondent	Comment	Partnership Response	Changes Made
	biodiversity areas, and you make no attempt to explain the current position.		
Paul Johnson	The document lacks a context, and can be read in different ways. After reading it I feel I know very little more than I knew before reading it. I don't know how to answer this question.	This initial consultation gave respondents the opportunity to influence the content of the SPD. After taking account of consultation responses the Partnership Authorities will prepare and then consult on the Draft SPD.	No change.
Jeffrey Hallett	See 2 above.	The impacts of specific infrastructure projects will not be discussed, other than where they relate to case studies of coastal adaptation best practice. The SPD will, however, provide guidance relating to implementation of coastal adaptation planning policies.	No change.
Margaret Hallett	Increased cooperation between companies to ensure the current ad-hoc planning situation where for example Sizewell C and on-shore parts of the wind turbines industry do not appear to be working together to reduce their impact the coast.	The impacts of specific infrastructure projects will not be discussed, other than where they relate to case studies of coastal adaptation best practice. The SPD will, however, provide guidance relating to implementation of coastal adaptation planning policies and will encourage co-operation between different landowners/developers etc.	No change.
North Norfolk District Council (Harry Blathwayt)	All new development in an area likely to be affected by Roll Back should not be able to claim compensation due to flooding or erosion. A realistic valuation of agricultural land not just financially but also its strategic worth to the country.	The partnership authorities will consider whether it is appropriate for the SPD to provide guidance relating to compensation, noting that compensation is not specifically referred to in our planning policies.	Consider providing guidance on compensation and financial assistance relating to roll back or relocation schemes.
Tessa Aston	That the coastline for Felixstowe be maintained as needed with particular reference to those areas of historical, ecological or biological areas. It is essential to protect these areas which also bring people to the town thus supporting local business.	The SPD will not alter the approach to the management of the coast as this is the role of SMPs.	No change.
Lindsay Frost	All guidance should focus on allowing natural processes to find a natural balance, and any human use of the coastal zone should not take place if it is at risk from storm surges or coastal erosion.	Comment noted.	No change.

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

Respondent	Comment	Partnership Response	Changes Made
	licensed caravans (holiday homes); some parks will have a mix. The ability to move caravans and pitches subject to owner licenses is different to fleet caravans. It may be necessary and appropriate for Caravan and Camping sites to relocate development within the same erosion zone/risk epoch (further away from imminent danger) for a period of time, whilst other roll back/relocation options are explored and brought forward.		
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	a. Please include clear guidance on the expectations relating to the need for Flood Risk Emergency Plans ( <a href="https://www.adeptnet.org.uk/system/files/documents/A%20DEPT%20EA%20Flood%20risk%20emergency%20plans%20for%20new%20development%20September%202019....pdf">https://www.adeptnet.org.uk/system/files/documents/A DEPT%20EA%20Flood%20risk%20emergency%20plans%20for%20new%20development%20September%202019....pdf</a> ) and the level of detail expected. In line with the direction of the Flood Risk and Coastal Erosion Policy Statement (2020), it could be prudent for guidance to be provided on requesting the applicant to outline their personal and business contingency plans for the short and medium term in relation to flood risk and coastal change Emergency Plans.	The SPD will not create new or amend existing planning policies as this is the role of the Development Plan and National Policy.	No change.
Felixstowe Town Council (Ash Tadjrishi)	The SPD should outline all relevant guidance, not only from Planning documents but also from the EA, LLFAs, MMO, NE, AONB in order to assist applicants and planning officers to consider all cohesively. Reference should be made to the Coastal Concordat.	The SPD will provide guidance relating to the implementation of coastal planning policies, and to other guidance where relevant to the implementation of coastal planning policies.	No change.
J E Blanchflower	Whilst I agree with the wording in Section 3 of the consultation document, the importance of allowing for climate change should be mentioned.	The SPD realises that coastal change is inherently linked to climate change, and will seek to provide case study examples of coastal adaptation best practice.	No change.
Lowestoft Cruising Club (David Bennett)	Seems to be fully covered in the Coastal Adaptation Supplementary Planning Document Initial Consultation, Section 4 Proposed Content of the SPD.	Support noted.	No change.
N/A (Caroline Spinks)	Predictions of risks and longevity of development projects based on modelling of coastal change.	The SPD will provide guidance relating to the implementation of Coastal Erosion Vulnerability Assessments (CEVA).	No change.

<b>Respondent</b>	<b>Comment</b>	<b>Partnership Response</b>	<b>Changes Made</b>
Andrew McDonald	No comment	N/A	N/A
Peter Terrington	Only essential development should be allowed in the coastal fringe. All other development should be encouraged to consider inland locations. Importance of Coastal Concordant for developments which overlap marine and terrestrial environments.	The SPD will provide guidance relating to the implementation of coastal planning policies, but cannot change these Local Plan policies.	No change.
SCEG - Scratby and California Environment Group (Lodge)	Need to clarify any replacement strategy. What future development will be allowed? What type of new dwellings will be allowed in the 100 year plan. Within the CCMA ie will kit houses allowed.	The SPD will provide guidance relating to the implementation of coastal planning policies but cannot change these Local Plan policies	No change.
Southwold Town Council (Lesley Beevor)	May need to reconsider guidance in area of north Southwold and south Reydon, depending on whether mitigation policies are in place.	The SPD will provide guidance relating to the implementation of coastal planning policies, which apply to all areas	No change.
Water Management Alliance (Jessica Nobbs)	The Internal Drainage Boards of the Broads (2006) and East Suffolk specifically would want to be consulted on any potential developments (including both permanent and temporary) within their Internal Drainage District by the relevant Local Planning Authorities. The Board believe this to be important as enabling development may impact on areas where important infrastructure such as Board Adopted Watercourses and Pumping Stations etc are cited. The Board may also have an interest in development that would be subject to its Byelaws (namely Byelaw 10 and Byelaw 3). The Board look to promote sustainable development within the IDD whilst taking into consideration elements such as environmental duties and ecological wellbeing, therefore having sight of potential developments that would impact on our IDD is important. CCMA should cover whole tidal flood risk zones to ensure catchment scale long term special planning to prevent inappropriate development now that will increase the cost of later enforced adaption from forecast sea level rise.	The Councils will ensure that the IDBs are being consulted on relevant applications  The SPD cannot not alter the CCMA as this is the role of Local Plans and SMPs.	No change

<b>Respondent</b>	<b>Comment</b>	<b>Partnership Response</b>	<b>Changes Made</b>
Deben Estuary Partnership (Christine Block)	No Comment	N/A	N/A
Anglian Water Services Ltd (Stewart Patience)	The focus appears to new development proposals and public realm infrastructure only. As set above there is a need to consider the existing infrastructure managed by Anglian Water as well any future investment in the area to serve our customers.	The SPD will provide guidance relating to the provision of infrastructure within and adjacent to the CCMA.	No change
Barton Willmore (Will Spencer)	No Comment	N/A	N/A
Bidwells (Kate Hammond)	All proposed new development ideas should be consulted and worked in partnership with local planning authorities. Guidance should be prepared using two-way communication between local authorities and other stakeholders to prevent any unnecessary extra cost on pre-application plans.	The Partnership Authorities will consult on the Draft SPD, when prepared. In relation to potential planning applications, the pre-application charging process is available and recommended	No change.
RSPB (Ian Robinson)	There needs to be clarity on the boundaries of the CCMA to understand how this relates to the wider SMP area, including the stretch of coast to Holkham, within the SPD. Documentation indicates the CCMA relates to Trimley Marshes and no other specific sites within the zone being considered, however the greatest rate of annual loss of land centres around the Benacre area. Any changes must be sustainable and demonstrate that any impacts on the environment will be avoided or minimised.	The CCMA is identified and mapped in the Suffolk Coastal, Waveney, and Great Yarmouth Stage 1 and emerging Stage 2 Local Plans Policies Maps. The CCMA (labelled the Coastal Erosion Constraint Area) for North Norfolk is identified on the North Norfolk Local Plan proposals map. The SPD cannot alter the CCMA as this is the role of Local Plans and SMPs.	No change.
The British Horse Society (Charlotte Ditchburn)	Guidance for development in the Coastal Change Management Area should include guidance regarding access, including the BHS leaflet for developers and planners enclosed with this letter. A document such as the 'Equestrians in Hampshire – a reference guide for Transport, Planners, Developers and other decision makers' mentioned below should be developed for each county and used for Norfolk and Suffolk. At very minimum developers should be aware of their duties regarding	Comment noted. The SPD will set out the powers bestowed upon coastal authorities and our partners that can be used to manage the coast, and coastal management policies and guidance established in Local Plans and national policy.	No change.

Respondent	Comment	Partnership Response	Changes Made
	'Public Rights of Way affected by coastal and estuarine change or management' provided by Suffolk County Council at: <a href="https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/rights-and-responsibilities/public-rights-of-way-affected-by-coastal-and-estuarine-change-or-management/">https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/rights-and-responsibilities/public-rights-of-way-affected-by-coastal-and-estuarine-change-or-management/</a> .		

**4. Are the categories identified in section 3 appropriate and comprehensive or should others be identified?**

Respondent	Comment	Partnership Response	Changes Made
Stu Precious	Tell people the proposals not just the methodology of the consultation.	The initial consultation gave respondents the opportunity to influence the content of the SPD. After taking account of consultation responses the Partnership Authorities will prepare and consult on the Draft SPD.	No change.
Paul Johnson	This is confusing - section 3 does not identify any categories, however section 4 does and they appear appropriate.	Support noted. The question should have referred to section 4.3.	No change.
Jeffrey Hallett	Need to define what is meant by the "eastern half" of the coastal coastal authorities. Does this include Pettistree?	The SPD will not be relevant to Pettistree as it only relates to the immediate coastal area	No change.
Margaret Hallett	The width of the "coastal band" is not sufficiently defined. Is it allied to height above sea level or settlements?	The initial consultation document does not refer to a "coastal band", but the SPD will cover the areas at potential risk of being affected by coastal erosion within the next 100 years.	No change.
North Norfolk District Council (Harry Blathwayt)	I think they are wide ranging enough to cover the bases.	Support noted.	No change.
Tessa Aston	How to maintain the beach should the water level rise. Is there sufficient protection in place for the houses and proposed businesses at Manor End. Contingency plan should the sea breach the wall, to what extent have the tides been affected since last review. Has the 100 year erosion plan stayed true or have matters accelerated.	The SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs).	No change.

<b>Respondent</b>	<b>Comment</b>	<b>Partnership Response</b>	<b>Changes Made</b>
Lindsay Frost	Not sure which 'section 3' is meant here? If it is the a, b, c bit then also d Offshore development e Vulnerability to storm surge flooding	Offshore development will be a matter for the marine planning regime to deal with and therefore guidance on marine development cannot be provided within the SPD. The primary focus of the SPD is providing guidance relating to the implementation of coastal adaptation planning policies, rather than flood risk planning policies.	No change
Richard Starling	We do not know as we have not had sufficient information yet.	Comment noted – more details will be included in the draft SPD	No change.
Norman Castleton	Sites of special geographic, historical, heritage, scientific, natural & geological interest.	The categories identified in section 4.3 relate to types of development within the CCMA, as well as guidance relating to Coastal Erosion Vulnerability Assessments. The SPD will provide specific guidance relating to geological or heritage sites, but will touch on these areas where relevant to the implementation of the coastal planning policies.	No change.
Blue Sky Leisure (Paul Timewell)	The SPD should acknowledge that some development will be seasonal and may require a different approach to the application of planning policy. For instance, works associated with Caravan and Camping parks may be best implemented 'out of season' to minimise economic impacts, which may affect time limits on decision notices. There should also be recognition of viability issues associated with roll back implementation, arising from the removal and relocation of services as well as caravans. This is a costly process, particularly if it results in loss of income while the roll back is taking place.	Comment noted. The SPD will provide guidance relating to roll back and relocation options and camping and caravan sites will be subject to consideration, given their significance to the local economy.	No change.
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	a. Most likely, although it would be helpful to see a breakdown of the contents for these section in order to provide any meaningful feedback.	Comment noted. When prepared the draft SPD will be consulted on, providing interested parties with the opportunity to comment on the detail of the SPD.	No change.

<b>Respondent</b>	<b>Comment</b>	<b>Partnership Response</b>	<b>Changes Made</b>
Felixstowe Town Council (Ash Tadjrishi)	The CCMA headings are appropriate. However, the LP rightly allows for Erosion Vulnerability Assessments to be required in certain locations in HTL areas. That should be explained, with examples. Other similar issues, e.g. the 30m Access Zones should be explained, whether in this section or perhaps better in a section dedicated to adaptation in HTL areas.	Comment noted. Guidance related to Coastal Erosion Vulnerability Assessments shall be explored, as with the application of such assessments in HTL areas.	Provide guidance related to the implementation of Policy SCLP9.3 with regard to the 30m zone landward of the CCMA.
J E Blanchflower	Add 'd. Respect for nationally designated areas such as AONBs, SSSIs, National Nature Reserves which should not be developed or subjected to damaging intervention'	The categories identified in section 4.3 relate to types of development within the CCMA, as well as guidance relating to Coastal Erosion Vulnerability Assessments. The SPD will not provide guidance relating to nature conservation or environmental designations, other than where relevant to the implementation of the coastal planning policies. Other Local Plan and NPPF policies cover development potentially affecting nationally designated areas.	No change.
Lowestoft Cruising Club (David Bennett)	Not sure if this question refers to 3. Links to Shoreline Management Plans (SMPs), or 4.3 Development in the Coastal Change Management Area.	Comment noted. The question should have referred to section 4.3.	No change.
Andrew McDonald	Yes, although '...development which could have adverse impacts on coastal erosion, coastal processes and vulnerability elsewhere...' could be expanded upon - is the 'vulnerability' strictly limited to coastal change?	Comment noted. The SPD will provide guidance relating to the implementation of coastal planning policies. Vulnerability, as referenced in the initial consultation document is referring to coastal erosion and coastal processes.	No change.
Peter Terrington	Yes but more emphasis need on the impacts of development in areas of accretion. See 10 below.	The identification of the CCMA extent takes account of coastal accretion. The SPD will provide guidance relating to development within the CCMA.	
SCEG - Scratby and California Environment Group (Lodge)	Clarification of use of land within the CCMA Commercial usage.	Commercial development will be covered under 'permanent and temporary development on the Coast'.	No change.
Southwold Town Council (Lesley Beevor)	Ok	Comment noted.	N/A

Respondent	Comment	Partnership Response	Changes Made
Water Management Alliance (Jessica Nobbs)	Development should have regard and ideally positively identify future role back for the freshwater environment requirements also. The natural landscape has huge economic and wellbeing value but is taken for granted currently. Given the long lead in times to create high biodiversity potential advanced build programmes would also be desirable. Bio-diversity offsetting payments through the planning process	The SPD will within its context chapter, set out the affects that coastal processes and policies can have on the natural environment. However, the guidance provided will primarily focus on the implementation of the coastal planning policies (i.e. development-related).	No change.
Deben Estuary Partnership (Christine Block)	No Comment	N/A	N/A
Anglian Water Services Ltd (Stewart Patience)	This section should highlight that any roll-back options need to be agreed in collaboration with the asset owners and be realistic about timescales for moving/changing any significant infrastructure. Should you have any queries relating to this response please let me know.	Comment noted. The SPD will highlight the need for collaboration with land and asset owners in discussing roll back and relocation options.	Highlight the need for collaboration with asset owners in agreeing roll back and relocation options.
Barton Willmore (Will Spencer)	No Comment	N/A	N/A
Bidwells (Kate Hammond)	We believe compensation opportunities should be identified, especially for land managers/owners where livelihoods are affected by coastal erosion and where roll back or new development is not feasible. We also believe that enabling development opportunities should be considered within the document, such as where agricultural land or property is lost or at risk of being lost in the short term other development options may be considered more favourably to enable businesses to diversify and continue / remain economically viable. This will maintain existing employment and potentially create future employment opportunities.	Financial compensation for loss of land due to erosion is not something currently allowable and the SPD cannot alter that.  The SPD will provide guidance relating to enabling development and the councils take a flexible approach but cannot create new policy.	No change.
RSPB (Ian Robinson)	We presume this question refers to the categories set out in Section 4, not section 3 as described in the initial consultation guidance document? As described in our comments to question 1, the RSPB advocates	The SPD will within its context chapter, set out the affects that coastal processes and policies can have on the natural environment.	Emphasise the impacts of coastal processes and planning policies on the

Respondent	Comment	Partnership Response	Changes Made
	differentiating between development for the purposes of nature conservation to maintain (and indeed improve) conditions for biodiversity, and separately covering development for other purposes e.g. built environment. This will help in judging and clarifying proposals when using guidance from NPPF para 157 (sequential and exception tests)	The terminology used within the SPD will categorise the built environment and natural environment separately so as not to underplay the important role of the natural environment and the ways in which it is affected by changes to the coast, whether they be natural or built.	natural environment (and vice versa).  Use terminology carefully and avoid using 'development' to refer to the built and natural environments.
The British Horse Society (Charlotte Ditchburn)	The 3 categories are appropriate.	Support noted.	No change.

**5. What guidance on temporary development within the Coastal Change Management Area should be included?**

Respondent	Comment	Partnership Response	Changes Made
Stu Precious	What proposed measures are currently in place and what is proposed to improve on that. This is just rubbish.	The initial consultation gave respondents the opportunity to influence the content of the SPD. After taking account of consultation responses the Partnership Authorities will write and consult on the Draft SPD.	No change.
Paul Johnson	Section 3 subsection 3 is beyond the scope of the typical non-expert reader to answer.	The initial consultation document was written in a manner that used plain English as much as possible, however some questions inevitably have to cover more complicated and technical grounds than others.	No change.
unite the union (Robert Riley)	fishing	While the SPD will pursue Integrated Coastal Zone Management to ensure effective alignment of the terrestrial and marine planning regimes, the SPD cannot provide guidance relating to policies set out in Marine Plans.	No change.
Jeffrey Hallett	"Temporary" needs to be defined. The 10 to 12 year construction time of Sizewell C is not temporary. For many it will be the rest of a lifetime!	The SPD will provide guidance relating to temporary development, including the time limits that should be applied to such development. The Sizewell C application has been approved under the national	No change.

Respondent	Comment	Partnership Response	Changes Made
		infrastructure regime. Whilst the construction will be temporary, the buildings themselves will be permanent, of course	
Margaret Hallett	What is "temporary" ? For example the negative effect of the 'temporary' (project 12 year) development of Sizewell C on the local community in terms of property value, tourist blight etc. will be life-changing for many locals.	The SPD will provide guidance relating to temporary development, including the time limits that could/should be applied to such development (which will be variable, depending on a range of circumstances).	No change.
North Norfolk District Council (Harry Blathwayt)	I would like a. To include Temporary Holiday Sites as an important issue as the previous 28 day allowance has increased to 56 days. As I have a massive site in an AONB in my ward I am very aware of the implications impacting all aspects of coastal life. Human and all forms of wild life and sand dune erosion.	Guidance in respect of criterion a. (of section 4.3 of the initial consultation document) will relate to temporary holiday sites. The 56-day allowance has now been returned to 28 days post-Covid	No change.
Tessa Aston	A regular review of the tides, climate change and how this will affect the shoreline and beach.	The SPD will not alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs). Coastal Erosion Vulnerability Assessments (CEVA) will be required in support of certain planning applications for development within the CCMA.	No change.
Lindsay Frost	Any temporary developments should not interfere with natural processes and should not be placed in areas at risk from storm surge flooding or coastal erosion.	Comment noted; however, some temporary developments can be appropriate in areas at risk from erosion and/or flooding. These are obviously very fact- and location-specific. The SPD will provide guidance on this matter	No change.
Richard Starling	Inform people that we have too many organisations making recommendations so best wait until things have been sorted with the BFI consultation.	This SPD and the Broadland Futures Initiative (BFI) operate within the same topic area, that of coastal change. However, the SPD is very much focussed on providing guidance relating to the implementation of planning policies, whereas the BFI is looking to inform the overarching flood risk management strategy for the next 100 years over a much wider area. The SPD and BFI can complement each other, and the SPD need not be restricted by the timings of the BFI.	No change.

Respondent	Comment	Partnership Response	Changes Made
Norman Castleton	No more caravan sites, no more static accommodation sites and as little development of any nature on the coastline as possible.	Comment noted, but Local Plan policies allow some (appropriate) new development/re-development in the coastal zone, although most forms of permanent new development (such as housing) are unlikely to be granted consent	No change.
Blue Sky Leisure (Paul Timewell)	The SPD should acknowledge that some temporary development may be necessary within the CCMA as part of a wider roll back proposal, to ensure continuity and viability of affected businesses. There may therefore be a need for temporary development in the high-risk zone to facilitate a successful roll back process.	This may be correct and the SPD will explore this point in more detail	No change.
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	a. A definition of what is considered to be temporary development in relation to the CCMA. We need to see a definition before identifying what guidance we would recommend. In addition, would temporary works/development include site compounds / material storage area / haul roads etc? If so some form of FRA and temporary drainage strategy would need to be considered. The same LLFA guidance as for permanent developments would apply.	The SPD will provide a definition for temporary development and this could include site compounds etc (if relevant)	No change.
Felixstowe Town Council (Ash Tadjrishi)	No comment	N/A	N/A
J E Blanchflower	Legally enforceable time limits, consideration of disturbance to the status quo, impact on the landscape, vulnerability in fragile areas, access routes.	The SPD will provide guidance relating to the implementation of Local Plan coastal planning policies, including in relation to time limits.	No change.
Lowestoft Cruising Club (David Bennett)	Only essential temporary developments should be included, e.g. temporary flood and erosion prevention measures.	Comment noted. The SPD will provide guidance relating to what development might be appropriate within the CCMA and in what circumstances but cannot replace or update Local Plan policy which covers this matter.	No change.
N/A (Caroline Spinks)	Predictions of risks based on modelling of coastal change.	Comment noted – the extent of the Coastal Change Management Areas are assessed in the production of Shoreline Management Plans (SMPs)	No change.
Andrew McDonald	No comment	N/A	N/A

<b>Respondent</b>	<b>Comment</b>	<b>Partnership Response</b>	<b>Changes Made</b>
Peter Terrington	Applications should be considered against impacts on the environment.	Planning applications are considered against impacts arising from the proposed development on the environment, amongst other things.	No change.
SCEG - Scratby and California Environment Group (Lodge)	What sort of structure would be allowed for this? ie kit houses, caravan sites or commercial enterprises.	The SPD will provide clear guidance as to what development may be appropriate in such areas and in what circumstances, building on the relevant Local Plan policies.	No change.
Southwold Town Council (Lesley Beevor)	No Comment	N/A	N/A
Water Management Alliance (Jessica Nobbs)	Duration of temporary development and its location. What effects development may have on infrastructure that the Board have an interested in and how these temporary works will be implemented and removed pre and post development. Widest sense should encourage green build low construction footprint	The SPD will provide guidance relating to time limits and the implementation and removal of temporary development.	No change.
Deben Estuary Partnership (Christine Block)	No Comment	N/A	N/A
Anglian Water Services Ltd (Stewart Patience)	No Comment	N/A	N/A
Barton Willmore (Will Spencer)	No Comment	N/A	N/A
Bidwells (Kate Hammond)	We believe approximate scientific time scales should be considered as part of the document and these should be reviewed as part of the development of this document.	The SPD will provide guidance relating to time limits of development, but the latest scientific evidence on sea-level rise, climate change etc and implications for planning and environmental policy is produced by Defra, DHLUC and the Environment Agency; the SPD therefore cannot alter these parameters	No change.
RSPB (Ian Robinson)	As described above in our comments related to Q3 the CCMA needs to be defined accurately. Any temporary development should only be considered as part of the staging process to move from the existing	The SPD will not alter the CCMA as this is the role of Local Plans and SMPs. The SPD will also not alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs).	No change.

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

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

<b>Respondent</b>	<b>Comment</b>	<b>Partnership Response</b>	<b>Make Changes</b>
esc (beavan)	height above sea level, geology, likelihood of funding for defences	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
Stu Precious	Property assessments Biodiversity assessments. Erosion Timescale assessments. Best practice audits. Hold the line v managed retreat. Budgetary impact assessments. Economic impact assessments. Long term Impact assessments.	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
unite the union (Robert Riley)	none	N/A	N/A
Jeffrey Hallett	Short and long term effects and the impact on both everyday life and tourism.	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
Margaret Hallett	The effect on people's every-day existence and longer term well-being	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
North Norfolk District Council (Harry Blathwayt)	Sand dredging at sea, particularly in the Yare alluvial basin off Great Yarmouth. I can not find definitive research on the impact on beaches to the north of this activity.	While the SPD will pursue Integrated Coastal Zone Management to ensure effective alignment of the terrestrial and marine planning regimes, the SPD cannot provide guidance relating to policies set out in Marine Plans or proposals governed under the marine planning regime, unless such proposals overlap with the terrestrial planning regime.  <a href="#">A report on Hemsby coastal erosion produced by consultants Jacobs for Great Yarmouth Borough Council in 2018 may be of interest</a> but to summarise, there is little or no evidence that modern offshore dredging has any effect on beach levels.	No change.

<b>Respondent</b>	<b>Comment</b>	<b>Partnership Response</b>	<b>Make Changes</b>
Tessa Aston	Whether the 100 year erosion line is still valid; is there need for further groynes; are the groynes in the best place still and is there a need to adjust their height in view of recent tide levels; with recent developments is the flood protection still appropriate for the area; what is the likely impact on geological and biological features and how has this changed	The SPD cannot create or amend policies concerning the future protection of specific stretches of coast as this is the role of the Shoreline Management Plan.	No change.
Lindsay Frost	Historic and predicted rates of erosion. Isostatic adjustment rates. Sea level rise rates. Potential loss of human life. Potential financial losses. Cost-benefit analyses of current flood and erosion defences. Wider impact of current coastal erosion and flood defences.	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
Richard Starling	A promise not to levy any fees or charges or indeed make a Coastal Erosion Vulnerability assessment compulsory for planning applicants. We have enough hoops to jump through now without more pointless assessments.	Coastal Erosion Vulnerability Assessments are required for certain development types within specified areas, as adopted through Local Plans. The SPD cannot alter the need to prepare CEVAs, but instead seeks to provide guidance in order to aid applicants in the preparation of CEVAs.	No change.
Norman Castleton	Economically important, naturally important, special scientifically important	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
Blue Sky Leisure (Paul Timewell)	The SPD should explain the role of Coastal Erosion Vulnerability Assessments, the circumstances in which they may be applicable to outweigh the shore line management plan, the weight that can be attributed to them in the consideration of development proposals, their expected content and technical work needed to underpin them and any expectations/requirements for Council and public engagement.	The SPD provides guidance relating to the role of Coastal Erosion vulnerability Assessments, the circumstances in which they may be required, the consideration and level of detail required in their preparation. The weight that can be attributed to a Coastal Erosion Vulnerability Assessment would be a matter for the decision maker, and cannot be prescribed in the SPD.	No change.
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	a. Description of the existing site and current day site conditions; b. Description of the proposed development; c. Description of the existing and future coastal erosion risk (including the impacts of climate change; d.	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.

Respondent	Comment	Partnership Response	Make Changes
	<p>Assessment of the current and future rate of erosion; e. An estimation of when the development is likely to be directly and indirectly compromised by coastal erosion and how this is likely to occur; f. Consideration of the potential change of flood risk posed due to coastal change; g. Consideration of the risk management measures that would be in place for the short, medium and long term scenarios; h. Description of what the applicants personal/business contingency plans for the short, medium and long term in relation to coastal change. i. An emergency plan for developments directly on the coastline.</p>		
<p>Felixstowe Town Council (Ash Tadjrishi)</p>	<p>The local geology, and erosion history, should be required to be investigated, with appropriate evidence bases.</p>	<p>Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.</p>	<p>No change.</p>
<p>J E Blanchflower</p>	<p>The effects of climate change and extreme weather patterns, whether erosion is compensated by deposition in another part of the coastline, allowing natural processes to take place rather than attempting to resist change with expensive and often unsightly defences.</p>	<p>Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.</p>	<p>No change.</p>
<p>Lowestoft Cruising Club (David Bennett)</p>	<p>Predicted global sea level rises and adverse weather events as a result of the climate emergency. Effect of unregulated use of upper Blythe estuary by speedboats, jet skis causing erosion, loss of habitat for nesting birds at certain times of year, disruption of emerging seal colony'</p>	<p>Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.</p>	<p>No change.</p>
<p>Andrew McDonald</p>	<p>No comment</p>	<p>N/A</p>	<p>N/A</p>
<p>Peter Terrington</p>	<p>Cost benefit analysis.</p>	<p>Consideration has been given to whether the proposed factor should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.</p>	<p>No change.</p>
<p>SCEG - Scratby and California</p>	<p>Time scale The demographics of the community Options for assessment of vulnerability</p>	<p>Consideration has been given to whether the proposed factors should form part of a Coastal Erosion</p>	<p>No change.</p>

<b>Respondent</b>	<b>Comment</b>	<b>Partnership Response</b>	<b>Make Changes</b>
Environment Group (Lodge)		vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	
Southwold Town Council (Lesley Beevor)	No Comment	N/A	N/A
Water Management Alliance (Jessica Nobbs)	No comments	N/A	N/A
Deben Estuary Partnership (Christine Block)	The Planning Practice Guidance provides the following advice on what a Coastal Change Vulnerability Assessment would need to demonstrate: "In considering the requirements of the National Planning Policy Framework a vulnerability assessment might demonstrate that the development: would not impair the ability of communities and the natural environment to adapt sustainably to the impacts of a changing climate; will be safe through its planned lifetime, without increasing risk to life or property, or requiring new or improved coastal defences; would not affect the natural balance and stability of the coastline or exacerbate the rate of shoreline change to the extent that changes to the coastline are increased nearby or elsewhere.	The SPD will be consistent with national policy and guidance.	No change.
Anglian Water Services Ltd (Stewart Patience)	No Comment	N/A	N/A
Barton Willmore (Will Spencer)	No Comment	N/A	N/A
Bidwells (Kate Hammond)	The elements that is causing the erosion whether it is surface drainage, underground springs, increasing sea levels, poor or unmanaged defences.	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
RSPB (Ian Robinson)	There should be a section in the proposed content on 'Working together to ensure a coherent network of designated coastal habitats is maintained through	Comment noted. However, the SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs).	No change.

Respondent	Comment	Partnership Response	Make Changes
	<p>adaptive coastal management on a dynamic coastline.’                      The approach presented within SMP 6 should be applied to SMP 5 and SMP 7. This clearly sets out predicted lines where the coast will be in the three epochs. Vulnerability will presumably change over time as erosion occurs and so an iterative approach will need to be adopted and options reviewed. Conflict will exist in valuation of property versus land versus legal status. Irrespective early planning must take place with opportunity mapping to define where housing and transport infrastructure will need to be placed, where freshwater habitats will need to be recreated, where non-designated land will need to be (if deemed appropriate and feasible) recreated well in advance of permanent change. A piecemeal approach will not be appropriate and must be based on a community, a business/facility, a discreet area of land.</p>		

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

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

Respondent	Comment	Partnership Response	Changes Made
	<p>and women, located around the coast of mainland Britain. All stations carry out the same task, which is to assist Her Majesty's Coast Guard in their task of helping people in trouble, on or near the sea. HM Coastguard recognises the worth of coastal surveillance stations and many, including ours at Pakefield, hold "Declared Facility Status" which means that they are recognised as contributing to the safety of life by operating a coastal station. Pakefield Coastwatch is responsible to HM Coastguard and operates from approximately Lowestoft Harbour to the village of Kessingland, and as far out to sea as visibility allows. Pakefield Coastwatch is a charity registered with the Charity Commission for England and Wales. I think that what Pakefield Coastwatch does is very important and should be taken into consideration when Roll-back and relocation options are discussed, taking note of its contributions to the safety of people on or near the sea. It is also part of the history of this coastline and should be preserved.</p>		
Jeffrey Hallett	<p>Insistence on proper public planning consent and not imposition by a Secretary of State.</p>	<p>The SPD cannot alter the decision-making procedure, as this is the role of planning legislation.</p>	<p>No change.</p>
Margaret Hallett	<p>to insist on Effective planning control by the local authority not over-ruled for so-called National importance issues</p>	<p>The SPD cannot alter the decision-making procedure, as this is the role of planning legislation. Nationally Significant Infrastructure Projects follow a separate planning process, with the final determination on these made by the relevant Secretary of State.</p>	<p>No change.</p>
North Norfolk District Council (Harry Blathwayt)	<p>This is dependant the scale of any Roll Back or managed retreat. Again this is likely to impact my ward as it includes Horsey, Waxham, Sea Palling, Hickling, and Potter Heigham. As any examination of the map will show the ward is almost entirely coastal and river flood plain 3. Large areas are dependant on Coastal and Broads National Park economy. What measures will be put in place to</p>	<p>The SPD will not alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs).</p>	<p>No change.</p>

Respondent	Comment	Partnership Response	Changes Made
	protect the more substantial settlements What wild life mitigation will be required in turning the area to salt wet lands from the present fresh water and marsh areas. The need of infrastructure to reduce salt incursion to the whole of the Broads Northern River System.		
Tessa Aston	Is there an existing plan should the need to relocate residents or structures of national importance due to climate change/higher tides.	The management of different sections of the coastline is set out in the Shoreline Management Plans (SMPs). The SPD will not alter the approach to the management of the coast as this is the role of SMPs.	No change.
Lindsay Frost	See the Pathfinder Pilot Project feedback from Happisburgh (North Norfolk) (see the excellent(!) chapter on coasts (pp 116-169) in Edexcel AS/A level Geography Book 1 published by Pearson).	The Partnership led on the Happisburgh project and so is well aware of it and it will feature as a case study in the SPD	No change.
Richard Starling	Await outcome of the Broadland Futures Initiative before we know in detail about relevant options.	This SPD and the Broadland Futures Initiative (BFI) operate within the same topic area, that of coastal change. However, the SPD is very much focussed on providing guidance relating to the implementation of planning policies, whereas the BFI is looking to inform the overarching flood risk management strategy for the next 100 years over a much wider area. The SPD and BFI can complement each other, and the SPD need not be restricted by the timings of the BFI.	No change.
Norman Castleton	Roll back should be a last resort and not as an excuse not to spend any money. The full consequence of roll back should be assessed e.g. the effects on the hinterlands including the marchlands of Broadland.	Rollback is part of the suite of options available to manage the coastline but any decision on rollback will primarily be made through the SMPs and Local Plans. All implications are carefully considered and the SPD will provide guidance on rollback	No change.
Blue Sky Leisure (Paul Timewell)	The SPD should acknowledge that the application of the roll-back and relocation policy will be different for different types of business, and the site-specific opportunities and requirements will vary. The scope of the options appraisal should be set out and include advice on expectations for	The SPD will provide guidance relating to the implementation of rollback and relocation planning policies and it is recognised that different approaches will be necessary for different situations	No change.

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

<b>Respondent</b>	<b>Comment</b>	<b>Partnership Response</b>	<b>Changes Made</b>
Peter Terrington	cost benefit analysis and investigation of sources of funding for inducements to homes and businesses to relocate inland	Comment noted. Decisions on rollback are rarely straightforward	Detail potential funding streams available to rollback and relocation proposals.
SCEG - Scratby and California Environment Group (Lodge)	Identifying land or sites appropriate for future roll-back use. As much detail as possible to guide the local authorities on what can be done. At what stage to allow action on policy	The SPD cannot identify land for development, for future rollback or relocation, as this is the role of the Development Plan but will provide guidance on rollback	No change.
Southwold Town Council (Lesley Beevor)	No Comment	N/A	N/A
Water Management Alliance (Jessica Nobbs)	Relocation options should consider if locations are to be within or near to one of the Internal Drainage Boards and associated infrastructure. Re-location may require adhering to the Boards Byelaws depending on the scope of development. Ideally an agreed catchment scale spatial plan should identify preferred "roll to" long term sustainable locations. Guidance should be fit a single property through to whole communities.	Comment noted. The SPD cannot identify land for development, for future rollback or relocation, as this is the role of the Development Plan. The SPD can however provide guidance relating to important considerations for rollback and relocation proposals.	No change
Deben Estuary Partnership (Christine Block)	No Comment	N/A	N/A
Anglian Water Services Ltd (Stewart Patience)	No Comment	N/A	N/A
Barton Willmore (Will Spencer)	No Comment	N/A	N/A
Bidwells (Kate Hammond)	Authorities and stakeholders to work in partnership to assess the needs of the opportunities available. We believe there should be a sensible look at areas for relocation/rollback and a more sympathetic planning partnership with local Parishes to allow businesses/Individuals to progress with bringing prosperity into their specific area. As stated above we also believe that enabling development opportunities should be	<p>Comment noted. The SPD cannot identify land for development, for future rollback or relocation, as this is the role of the Development Plan.</p> <p>The SPD will provide guidance relating to enabling development, but again cannot create or modify existing policy.</p>	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>considered within the document, such as where agricultural land is lost other development options may be considered more favourably to enable businesses to diversify and continue / remain economically viable. Enabling development can be included to cover the additional costs of replacing assets which are lost. This will maintain existing employment and potentially create future employment opportunities.</p>		
<p>RSPB (Ian Robinson)</p>	<p>Comments mentioned in response to question 6 are also relevant. Compensation and other costs should be factored in. Within SMP's 5 and 7 significant areas of low-lying coastal habitat fall within Flood Zone 2, suggesting change within Epoch's 1 and 2. SMP 5 shows maps of adaptive measures i.e. relinquishing land currently freshwater to brackish/salt, whereas SMP 7 merely shows Flood Zone categorisation. In addition, within the options described in SMP7 the position describing retention of biodiversity status quo is invalid. The biodiversity value of brackish and saltwater habitats cannot be compared like for like with freshwater habitats as each supports a different range of species. If the prediction is freshwater habitats will be lost in allowing natural processes to occur to benefit the whole focus area covered by the SPD, then these habitats need to be recreated to sustain wildlife dependent on the biotic parameters found within these habitats. Significant areas of low-lying coastal marsh will inevitably be lost and as has been shown in North Norfolk replacing this habitat type may only be possible some considerable distance away. Have relocation zones been earmarked where not only the type of the habitat but also the scale (i.e. hundreds of hectares) been identified? Resolving this issue is likely to be much harder (but no less important) than relocating a household or a business threatened from coastal change, and recognition needs to given to the time needed to</p>	<p>The Partnership will explore the opportunity to provide guidance relating to compensation.</p> <p>The SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs). The SPD also cannot identify land for rollback and relocation of natural habitat or built development as this is the role of the Development Plan, or for development proposals to demonstrate through planning applications. IT does, however, encourage the consideration of habitat (re)creation</p>	<p>Consider providing guidance relating to compensation and other financial assistance for coastal adaptation projects.</p>

Respondent	Comment	Partnership Response	Changes Made
	create a quality replacement, not just to finding an equivalent area of land. It will likely be that the location for replacement habitats may well fall outside of the relevant SPD area and even planning authority areas for example inland into the Cambridgeshire fens.		
The British Horse Society (Charlotte Ditchburn)	Developers should be provided with information about diverting Public Rights of Way provided by Norfolk County Council at: <a href="https://www.norfolk.gov.uk/out-and-about-in-norfolk/public-rights-of-way/public-path-orders#:~:text=The%20Council%20has%20a%20power,Bridleways%20or%20Restricted%20Byways%20respectively.">https://www.norfolk.gov.uk/out-and-about-in-norfolk/public-rights-of-way/public-path-orders#:~:text=The%20Council%20has%20a%20power,Bridleways%20or%20Restricted%20Byways%20respectively.</a> And by Suffolk County Council at: <a href="https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-and-planning/">https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-and-planning/</a> / <a href="http://www.suffolkpublicrightsofway.org.uk/home/making-changes-to-the-public-rights-of-way-network/">http://www.suffolkpublicrightsofway.org.uk/home/making-changes-to-the-public-rights-of-way-network/</a>	Comment noted. The SPD will set out the powers bestowed upon coastal authorities and our partners that can be used to manage the coast, and coastal management policies and guidance established in Local Plans and national policy.	No change.

### 8. What guidance on enabling development should be included?

Respondent	Comment	Partnership Response	Changes Made
Stu Precious	Oh puhleeze. this is stupid. The National planning Framework provides this.	National Policy makes provision for enabling development in the context of preserving or enhancing heritage assets. National policy does not make provision for enabling development in respect of coastal matters but this SPD can and does.	No change.
unite the union (Robert Riley)	offshore	While the SPD will pursue Integrated Coastal Zone Management to ensure effective alignment of the terrestrial and marine planning regimes, the SPD cannot provide guidance relating to policies set out in Marine Plans or proposals governed under the marine planning regime, unless such proposals overlap with the terrestrial planning regime.	No change.

<b>Respondent</b>	<b>Comment</b>	<b>Partnership Response</b>	<b>Changes Made</b>
Jeffrey Hallett	What is enabling development in this context? The definition in 5 appears to be just the sort of action by a Secretary of State that I have mentioned in Q 7.	Comment noted. Enabling development is development that would ordinarily be contrary to policy but would secure a particular public benefit which may outweigh the disbenefits of departing from policy.	No change.
Margaret Hallett	Not sure what 'enabling development' means. If it is development that over rules local agreements and concerns it is not wanted.	Comment noted. Enabling development is development that would ordinarily be contrary to policy but would secure a particular public benefit which may outweigh the disbenefits of departing from policy.	No change.
North Norfolk District Council (Harry Blathwayt)	An expected life span of the development, taking into account worst case scenarios regarding the effects of global warming, particularly on water levels and turbulent weather patterns.	Comment noted. The SPD will provide guidance relating to the expected lifespan of development in the CCMA and of the particular public benefit that may enable an assessment as to whether a departure from policy is warranted.	Guidance relating to the expected lifespan of development and of the particular public benefit 'enabled' by the development.
Tessa Aston	Whilst development is always good news for towns it must be done with care. To overload the existing systems and land could be detrimental. Yes Felixstowe wants to increase the revenue brought into the town but it must not affect the existing nature reserve or areas of historical or biological importance. Careful watch needs to be maintained as the climate changes which will affect the sea, port and residential areas. It is a fine balance between improving the town and its facilities without disturbing the fragile environment.	Comment noted; reaching a balance is not always easy, as has been stated but the SPD will aim to help provide guidance on this matter.	No change.
Lindsay Frost	All developments should be as risk free as possible (erosion, storm surge) and not cause interference with natural processes.	Comment noted and it is agreed that it is vital that any enabling development is itself as risk-free as possible and does not cause unjustifiable interference with natural processes. Almost all enabling development would be expected to be outside the CCMA	No change.
Richard Starling	Await outcome of the Broadland Futures Initiative before we know in detail about relevant options.	This SPD and the Broadland Futures Initiative (BFI) operate within the same topic area, that of coastal	No change.

Respondent	Comment	Partnership Response	Changes Made
		change. However, the SPD is very much focussed on providing guidance relating to the implementation of planning policies, whereas the BFI is looking to inform the overarching flood risk management strategy for the next 100 years over a much wider area. The SPD and BFI can complement each other, and the SPD need not be restricted by the timings of the BFI.	
Norman Castleton	There should be no further development apart from defensive work on the coastline	Comment noted but this is not a realistic position – some development (such as for critical infrastructure) will always be necessary and other development may be acceptable and even desirable, so long as the impacts and any risks are not unacceptable	No change.
Norfolk County Council - Natural Environment Team (Catherine Dew)	When ‘enabling development’ there are opportunities to look favourably on developments that provide additional BNG (e.g. 100% -200% above the baseline) and incentives for green roofs....etc. but this will need to be carefully thought out as development will still need to avoid ecologically sensitive areas.	Comment noted. The Partnership will consider providing guidance relating to Biodiversity Net Gain, in anticipation of the provisions of the Environment Act.	Consider providing guidance relating to Biodiversity Net Gain.
Blue Sky Leisure (Paul Timewell)	The SPD needs to acknowledge that Roll-Back can be an expensive process and should provide positive and clear advice on the nature of enabling development that would be considered acceptable, for instance, to help fund roll back proposals. It should include expectations for material and information demonstrating that enabling development is appropriate. It should also provide advice and guidance where enabling development might be a distance away from the activity affected by coastal change, including in another district.	Comment noted. The SPD will provide guidance relating to enabling development, including the circumstances under which enabling development may be acceptable.	No change.
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	Difficult to really comment much on this in general terms. Therefore, the LLFA would wish to discuss such sites on an individual and detailed basis. We would also request guidance to be produced on conducting ground	Comment noted and agreed – each proposal will have to be judged on a case-by-case basis	No change.

Respondent	Comment	Partnership Response	Changes Made
	investigations, building access routes and putting up storage area that is in accordance with our current LLFA developer guidance and LLFA policies. Again, our requirement for a Flood Risk Assessment and temporary drainage strategy would need to be completed in accordance with our existing guidance.		
Felixstowe Town Council (Ash Tadjrishi)	No comment – this is not currently relevant to Felixstowe - long may that remain so.	N/A	N/A
J E Blanchflower	Suggesting sites for development away from the coast or using 'brown field' coastal sites. Coastal development should be discouraged so that the remaining undeveloped sections of our coastline remain as wildlife habitats to be appreciated by future generations. Above all, no more second homes on coastal sites.	Comment noted. Enabling development would normally be expected to be away from the coast.  The SPD has no power to limit whether any new homes are second homes.	No change.
Lowestoft Cruising Club (David Bennett)	Difficult to suggest specific guidance as it depends on the particular development and how it is contrary to policy, and how and to what extent it would secure a particular public benefit which may outweigh the disbenefits of departing from policy.	Comment noted and agreed – enabling development can only be judged on a case-by-case basis	No change.
N/A (Caroline Spinks)	Sometimes NOT to develop may be the more valuable option.	Comment noted.	No change.
Andrew McDonald	Previous experience of the proposed (and actual) use of Enabling Development by Suffolk Coastal D C (and the statements in sections 3.72-3.74 of the recently adopted East Suffolk Local Plan) give cause for concern that Enabling Development may be regarded as a policy option, rather than an exceptional mechanism. It is also difficult to determine from the consultation document exactly what form this 'option' would take – could ED be used as a fundraising mechanism to defray the cost of relocation? Or would it be used as a mechanism for siting relocated housing in areas which would normally be inaccessible to development? In either case, it is important to take very	Comment noted. Paragraphs 3.72-3.74 of the Suffolk Coastal Local Plan (SCLP) demonstrate the importance of a plan led system by noting that enabling development may be accepted in exceptional circumstances – in other words, every such case needs to demonstrate the particular justification to warrant a departure from the Local Plan, and the bar is high.  Plan-led approaches helpful to relocation and rollback can be practised. Waveney Local Plan Policy WLP6.1 is an allocation of 220 new dwellings in	No change.

Respondent	Comment	Partnership Response	Changes Made
	seriously the restrictions on the use of Enabling Development – as the current Local Plan states, it requires ‘..exceptional individual circumstances..’, and its use in exceptional circumstances ‘... needs to be justified, transparent and deliverable as a comprehensive package, with clear community benefits.’ {para 3.73}. It cannot be adopted in advance as a potential funding or development option, and it is surely preferable for East Suffolk Council to use the existing planning system appropriately, rather than to seek to rely on mechanisms that avoid the planning regulations that have been adopted to protect the community and its environment.	Reydon, of which seven are reserved for people whose properties have already been lost to erosion, or are at high risk of being lost soon. But there will always be occasions where a case is made for enabling development, which cannot have been envisaged by the Local Plan.	
Peter Terrington	Only essential development considered in coastal fringe.	Comment noted – inappropriate development in the CCMA is by definition not acceptable	No change.
SCEG - Scratby and California Environment Group (Lodge)	Identifying land or sites appropriate for future roll-back use. As much detail as possible to guide the local authorities on what can be done. At what stage to allow action on policy	Comment noted. The SPD cannot identify land for development, for future rollback or relocation, as this is the role of the Development Plan, but will provide guidance to assist.	No change.
Southwold Town Council (Lesley Beevor)	No Comment	N/A	N/A
Water Management Alliance (Jessica Nobbs)	The Board have created a number a document (Planning and Byelaw Strategy) which we believe should be referenced within the SPD when referring to development within one of the Boards IDD which will help other Risk Management Authorities as well and land managers and developers intending to undertake works/development within the IDB districts. The document intends to support other RMAs that relate to flood risk, erosion and environmental matters.	Comment noted. The SPD will reference documents where they would be of relevance to the application of the guidance provided.	No change
Deben Estuary Partnership (Christine Block)	Points on Enabling Development taken from the appendix to Deben Estuary Plan: Enabling development may be permitted as an exception to policy when delivering sufficient, measurable benefits to flood protection and	Comment noted. Consideration will be given to the Deben Estuary Plan’s enabling development criteria with a view to setting out appropriate criteria in the draft SPD.	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>estuary management which could not otherwise be achieved. Reasons for allowing Enabling Development: ●● to provide direct financial benefit to estuary management – focused on essential, long term, flood protection measures within a defined estuary area, necessary to maintain or improve flood defence ●● to support opportunities to deliver partnership funding when a lack or shortfall of government grant aid and other finance and restricts action ●● to support flood protection measures which have been agreed as necessary by all relevant landowners and consented by the EA Site selection for enabling development should: ●● be located outside areas identified by the Environment Agency as being at risk of flooding from estuaries or sea ●● be based on a principle of the optimal number of additional dwellings sustainable within a defined parish and estuary area ●● be appropriate in scale, sensitive to the topography and mindful of any landscape and environmental designations that apply ●● have no significant, adverse impact on biodiversity and geodiversity ●● contribute to enhancing or maintaining the sustainability of rural communities in accordance with the Settlement Hierarchy ●● deliver development that reflects, when possible, evidenced local need in terms of dwelling size and configuration ●● include the conversion or re-use of redundant or disused buildings</p>		
<p>Anglian Water Services Ltd (Stewart Patience)</p>	<p>No Comment</p>	<p>N/A</p>	<p>N/A</p>
<p>Barton Willmore (Will Spencer)</p>	<p>NFOWF Ltd welcomes the recognition in Section 4 of the Consultation Document that there may be circumstances whereby ‘enabling development’ may be supported. As noted this is development that would be justified based on how its benefits outweigh any disbenefits of departing from policy. The SPD should state that such enabling</p>	<p>The SPD will not set out the types of development that may or may not be granted consent as enabling development, that is for the decision maker on a case by case basis, but the kinds of development suggested here may be essential infrastructure which can only be located at the coast – which means they</p>	<p>No change.</p>

Respondent	Comment	Partnership Response	Changes Made
	development may include infrastructure associated with the delivery of renewable energy developments, such as the electricity grid connection for an offshore wind farm or any works/activities associated with its construction (such as the use of ports infrastructure for the assembly/shipping of components). It is not the place of the SPD to seek to impede development which may, subject to appropriate mitigation and effective management, deliver significant overarching benefits to the coastal environment.	are not normally enabling development themselves and will be considered elsewhere in the SPD	
Bidwells (Kate Hammond)	Each application should be looked on its own merits/disadvantages and not specifically attached to a set of immovable guidelines.	Comment noted and agreed – flexibility and a case-by-case appraisal will always be necessary for any proposed enabling development scheme	No change.
RSPB (Ian Robinson)	Guidance on enabling development must be clear on the process that needs to be followed to assess the potential impacts. With respect to the environment, the RSPB expects that potential impacts will be captured through a comprehensive Strategic Environmental Assessment and Habitats Regulations Assessment. These will assess options and identify predicted impacts for which there is a very clear process for mitigation and/or derogation and compensation where appropriate. Such a project will need to ensure that the Competent Authority that the overall coherence of the Natura 2000 network will be maintained.	The process for enabling development will be the same for an ordinary planning application. Applications must be submitted with the appropriate evidence and assessments where necessary, which may include Strategic Environmental Assessments and/or Habitats Regulations Assessments.	No change.
The British Horse Society (Charlotte Ditchburn)	Developers should be provided with a copy of 'GG 142 Walking, cycling and horse-riding assessment and review' to ensure any infrastructure relating to development considers all Non-Motorised Users equally. Developers should consult the Norfolk Rights of Way Improvement Plan which states: Opportunities for development – To consult with the equestrian/driving community and establish where there are particular opportunities to improve access to create multi-use routes away from roads.' Developers should be aware of the District or Borough Councils guidance on Public Path Orders as the local planning	Comment noted. The SPD will set out the powers bestowed upon coastal authorities and our partners that can be used to manage the coast, and coastal management policies and guidance established in Local Plans and national policy.	No change.

Respondent	Comment	Partnership Response	Changes Made
	authorities responsible for changes to the Public Rights of Way Network with regards to development.		

### 9. What case studies should be used in this SPD to demonstrate coastal adaptation best practice?

Respondent	Comment	Partnership Response	Changes Made
Stu Precious	Hopton Beach. The debacle in causing adverse longshore drift that is Great Yarmouth Outer Harbour. Hemsby, Happisburgh.	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
unite the union (Robert Riley)	work load	N/A	N/A
Jeffrey Hallett	?	N/A	N/A
Margaret Hallett	No idea what this means either	N/A	N/A
North Norfolk District Council (Harry Blathwayt)	We need to study the best practice of other Low Land areas especially the Benelux countries	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
Tessa Aston	Looking at Climate Adaptation Platform, the National Park Service 2015 undertook 24 case studies giving examples of infrastructure and coastal adaptation strategies incorporating climate change, improving public awareness, how to make the infrastructure resilient to climate change. European Climate Adaptation Platform 2018 looked at 10 case studies. NCCARF and CoastAdapt Archive Library - Adaption Good Practice case studies 2017	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
Lindsay Frost	Happisburgh, Norfolk from 2009 Coastal realignment in Essex	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
Richard Starling	Who knows !!! Lets us wait for the opportunity for the public to ask questions, find out information from those responsible ie The Environment Agency.	When prepared, the Partnership will consult on the Draft SPD.	No change.
Norman Castleton	The defensive work in Holland and that Sea Palling and work by the RSPB	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
Blue Sky Leisure (Paul Timewell)	The SPD could use the planning permission granted in the 1990s by North Norfolk District Council, that permitted the	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.

Respondent	Comment	Partnership Response	Changes Made
	relocation of 42 vulnerable static caravan pitches from the clifftop at Woodhill Holiday Park, East Runton, to an alternative site in the AONB at Kelling Heath Holiday Park. This is a good example of a successful application of the roll back policy, which has since been successfully implemented and led to the adoption of a positive Local Plan policy to cover this type of development.		
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	No examples are known to be available from Norfolk CC Lead Local Flood Authority. This aligns the district councils and the EA are responsible for coastal protection. The LLFA will appreciate that any roll back may involve flooding to Norfolk. We are aware of the Bacton Sandstone Project is an example that NNDC were leading on and received funding for. We are aware that the managed re-alignment or roll back of the coast will have an impact on the infrastructure that the County Council are responsible for e.g. the Coast Road. Therefore, any such policies should take account of this.	Comment noted. The Partnership will explore the opportunity of including the mentioned case study.	Consider Bacton case study.
Felixstowe Town Council (Ash Tadjrishi)	In regard to safety in HTL areas, 2 cases demonstrate options: i) Martello Park Felixstowe ii) Adastral Close Felixstowe (Orwell Housing Assn)	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
J E Blanchflower	Minsmere RSPB Reserve which is of international importance as a wildlife/ornithological habitat and has an unspoiled, undeveloped interface with the sea. The Lowestoft Action Zone includes some imaginative ideas for re-development of the Denes area which was a former fishing hamlet (The Grit) and industrial site. The open spaces/net drying areas will remain for leisure and historical importance.	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
Lowestoft Cruising Club (David Bennett)	Any case studies that are relevant to the type of coastline covered by the Coastal Adaption SPD.	Comment noted.	No change.
Andrew McDonald	No comment	N/A	N/A

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

Respondent	Comment	Partnership Response	Changes Made
	<p>would be valuable for informing appropriate options on the Norfolk and Suffolk coast and further afield. Much of this experience has been gained through close working with the Environment Agency in relation to adapting coastal management and as part of their Habitat Creation Programme. Such projects include: Titchwell; Minsmere North Marsh; Dingle Marshes; Wallasea; Medmerry; plus, many projects overseas working with Birdlife partners and country Governments. We also have a range of advisory material that may be helpful to determine appropriate options based on the ecological requirements for a suite of species and habitats, including: Wet Grassland and Reedbed guides and our contribution within the Fen Management Handbook The principle must be to always operate at a landscape scale employing the Lawton principle – bigger, better, more connected; making best use of opportunities for net gain and creating a more equitable balance between nature and agriculture and business. Equally the benefits of saltmarsh as one of the better habitats capable of sequestering carbon should not be underestimated, but not used as a measure or justification for allowing coastal change. This creates an opportunity to apply net gain principles in creating a new habitat, whilst at the same time relocating existing freshwater habitats and landscapes with better integrated land management to safe locations inland.</p>		

**10. Do you have any other comments which could help the partnership prepare the Supplementary Planning Document?**

Respondent	Comment	Partnership Response	Changes Made
Stu Precious	GO and do your homework. Not at all impressed. Bring a workable proposal, not a pen pushing box ticking exercise.	The initial consultation gave respondents the opportunity to influence the content of the SPD. After taking account of consultation responses the Partnership Authorities will prepare and consult on the draft SPD.	No change.

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

Respondent	Comment	Partnership Response	Changes Made
Margaret Hallett	It is important that it is understood that the coastal area is very important to many locals who may live 20 miles from the coast but use the area frequently for work, shops, recreation and entertainment so that the partnership should not be restricted to those from parishes who have a shoreline!	The initial consultation on the SPD was sent via email and/or letter to all individuals and organisations on the Partnership Authorities' mailing lists, and all town and parish councils. Furthermore, the consultation was open to the public and therefore anyone could have responded to the initial consultation.	No change.
North Norfolk District Council (Harry Blathwayt)	Only that I am concerned that the area I represent is very vulnerable and will be affected greatly by any decisions or recommendations of this body.	The SPD will not make recommendations or policy concerning the coast and development at or near to the coast Comment. It will instead provide guidance for the application of coastal adaptation planning policies.	No change.
Keith Phair	I am aware that the various coastal defences in the area are owned by various bodies and the responsibility for repair and maintenance therefore falls on a range of public and private organisations. It would be highly helpful if these could be mapped and responsibility clearly delineated, so that those organisations and the public have a clear understanding of ownership and responsibility. For example, my understanding is that parts of the prom at Felixstowe are the responsibility of the District Council and other parts are the responsibility of the County Council and other bodies.	Various organisations have roles and responsibilities in relation to buildings, infrastructure and the environment along the coast. The draft SPD will set out the roles and responsibilities of some of the key organisations on the coast.	Set out the roles and responsibilities of key organisations along the coast.
Tessa Aston	Be guided by what is best for this beautiful area of Suffolk not in monetary value but in consideration of what works right now.	The SPD will provide guidance relating to a number of different considerations that need to be made in decision making, including but not limited to the preservation of the historic and natural environments along the coast.	No change.
Gaius Hawes	1. It seems that the intention here is to create an across the board information and legislation info without any clout. So just informative which although good in one respect. It seems that each authority will do just as it wishes. 2. Is it financially viable to have such an organisation that works with varied authorities that have varying degrees of interest. 3. In the past Suffolk Council has made statements about	When adopted, the SPD will be a material consideration and carry weight in the determination of planning applications.  The Partnership preparing the SPD includes East Suffolk Council, Great Yarmouth Borough Council, The Broads Authority, North Norfolk District Council,	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>building distances between planned structures and the sea wall here in Lowestoft. Only for the local authority at the time to overrule what has been published. What are the chances of one area seeing the benefit and there to be realistic control. 4. It is apparent that the Port Authority here has more clout than many appreciate. By closing of roads that have been used by the public for many years. Or even the South Pier. So will the power of Felixstowe lead to unbalanced approach once this is up and running. As money speaks. 5. How often will the body meet to discuss and how will it be managed let alone funded. 6. Although communication should be increased through this I just wonder if it will be used to be abused.</p>	<p>and the Coastal Partnership East Team. The Partnership is therefore operated by officers from each Local Planning Authority and funded by the authorities involved.</p>	
<p>Lindsay Frost</p>	<p>Must include adaptations to climate change and isostatic readjustment</p>	<p>The SPD realises that coastal change is inherently linked to climate change, and it is through Local Plan policies, SMPs and Environment Agency advice on sea-level rise rates etc that these factors are taken into account.</p>	<p>No change.</p>
<p>Michael Castle</p>	<p>1. I accept the premise for a whole coast strategy whilst needing to point out that GT YARMOUTH town stands out as an exception in that - like HULL further up the coast - it is a densely populated settlement with port and industrial infrastructure that needs to be defended by engineering solutions. To that extent it differs from the bulk of the coastline between the Orwell and the Wash. The BACTON inter-connector gas pipeline is another location where engineering may be the preferred approach. 2. Roll-back and relocation are considerations for coastal villages further North in the Borough - for example WINTERTON, SCRATBY and HEMSBY - although the latter's holiday industry is a complicating factor to such an approach. 3. In the case of the town area of GT YARMOUTH itself it will be important to show that difference in terms of the long-term strategy and acknowledge the ongoing large Environment Agency</p>	<p>The SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs). However, the different nature of the whole coast is, of course, recognised, both in SMPs and Local Plans. The SPD will provide helpful guidance, but it will not be a 'one-size-fits-all' approach.</p>	<p>No change.</p>

Respondent	Comment	Partnership Response	Changes Made
	investment in River Defences along the Yare and Bure to bring those up to 1:200 year standard and to acknowledge the strategic regeneration development sites on Yarmouth river frontages.		
Richard Starling	I suppose you have to find something to do but please just wait until we have information and facts from the Environment Agency. There is no urgency to complete a Supplementary Planning Document.	This SPD and the Broadland Futures Initiative (BFI) operate within the same topic area, that of coastal change. However, the SPD is very much focussed on providing guidance relating to the implementation of planning policies, whereas the BFI is looking to inform the overarching flood risk management strategy for the next 100 years over a much wider area. The SPD and BFI can complement each other, and the SPD need not be restricted by the timings of the BFI.	No change.
Great Yarmouth Borough Council (Environmental Services) (David Addy)	I can confirm that Great Yarmouth Borough Council's Environmental Services supports the proposed Coastal Adaptation Supplementary Planning Document, and has no detailed comments to make.	Support noted.	No change.
Robert Wynn and Sons (Tim West)	We read with interest the Coastal Adaptation Supplementary Planning Initial Consultation Document, which sets out the purpose and planned scope for your document. We would very much support your whole coast approach taken by yourselves. We would wish to highlight that there are power generation and transmission sites earmarked for development within your region that will require the movement of large and heavy abnormal indivisible loads. Due to the size and weight of transformers, generators etc project developers should be encouraged to limit the road mileage travelled by such loads. Such sites would include Sizewell C and the onshore connections for the many offshore windfarms planned in your region. Planning guidance should not be a barrier, more so should facilitate the opportunities for beach landing suitable craft	The guidance provided within the draft SPD may be of relevance to planned large scale infrastructure projects. In addition, the SPD will pursue Integrated Coastal Zone Management to ensure effective alignment of the terrestrial and marine planning regimes. However, loads required to be moved by sea may form part of nationally significant energy projects, which would not require planning permission but a Development Consent Order under the Planning Act 2008. In such circumstances, the draft SPD would not be relevant.	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>for the delivery of the largest and heaviest abnormal indivisible loads. Subject to achieving a marine licence via the Marine Management Organisation and permissions from landowner (Crown Estate &amp; Local Authority) beach landings can and have been used to significantly reduce the road mileage travelled by the largest abnormal loads. We would be happy to input when appropriate to the development of further guidance on coastal development and attach a few images of beach landings where either no infrastructure was required or where temporary infrastructure was created and then removed.</p>		
<p>Martlesham Sea Wall Group (Thomas O'Brien)</p>	<p>I live in Martlesham Heath, just East of Ipswich. Its an area planned for immense growth. So a group of us has come together to try and increase foot access along the river Deben. (Martlesham River Wall Group). In particular we would like to see Martlesham Creek linked with Waldringfield. A public footpath exists but the sea wall has been broken at one point making the path unpassable. Currently Natural England are supporting the English Coast Path along the river Deben. Which includes forming a footpath from Martlesham Creek to Waldringfield. Discussions are under way to create this. Your plan should stipulate the importance of the England Coast Path and its value to the public. As well as this, at the last general election, two political parties supported the idea of a Suffolk Coast National Park. An idea could be to expand the Broads National Park to include Suffolk Coast. (Save on administration). I think your report could suggest the idea of a Norfolk and Suffolk National Park. Some bodies can have an overly negative attitude to public access. In particular the conservation groups are developing a 'landowner' mentality. Taking claim to wide stretches of the coast and estuaries assuming it belongs to them, preventing public 'disturbance' but nevertheless turn up whenever they wish in 4 wheel</p>	<p>The SPD will not propose works or development within the SPD area, however the guidance provided within the SPD may be of relevance to such works or development.</p> <p>The SPD will primarily focus on providing guidance relating coastal planning policies, however public access to our coast and estuaries is of great importance and will be an important consideration in the application of coastal planning policies.</p>	<p>No change.</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>drive vehicles and trample everywhere looking for rare plants and insects. Also introducing animals such as Exmoor ponies which means widespread fencing which in turn inhibit public access. But the fact remains places like Martlesham are growing considerably. Its only fair to the inhabitants of these new towns to provide access to the outdoors. The two issues of planning for new dwellings and protecting our coast should not be two separate issues. If new dwellings are planned near the coast then inevitably the public will seek to enjoy the outdoors. We cannot just put a barbed wire fence around new communities. Some thought can be put to shielding footpaths with fences, and regular bird hides so that the wildlife can be protected and at the same time the public can enjoy being there.</p>		
<p>Michael Powles</p>	<p>East Norfolk and North East Suffolk Our coastlines are under threat from the sea and from the landward side. Eventual inundation of coastal areas from the sea as a result of global warming is now a given. Melting glaciers and disintegrating polar ice caps are visible, measurable and credible. It is not a question of if, but when, we shall be overwhelmed by the sea and/or rivers backing up. The town of Great Yarmouth and much of the rest of the borough is surrounded by water and marshes. The latter are mostly at or below existing sea level. Gt. Yarmouth and parts of Lowestoft are already highly vulnerable to flooding from sea and rivers. If the sea defences are breached salt water could travel long distances inland and flood places like Hickling, Potterheim, areas around Acle and all along the river courses and through the Broads. Volatile shore lines still come and go but long term residents are clear that the overall trend is for the shoreline to retreat inland where not defended. From the landward side the coastline is vulnerable as a result of excessive development over many years, leading to ever increasing levels of human footfall and leisure activities. The trend to</p>	<p>The SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs). Nor can the SPD create new or amend existing planning policies as this is the role of the Development Plan and National Policy.</p> <p>The SPD will, however, provide guidance relating to the implementation of costal adaptation planning policies.</p>	<p>No change.</p>

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

Respondent	Comment	Partnership Response	Changes Made
	vulnerable and sensitive areas and critical natural sea defences.		
The British Horse Society (Charlotte Ditchburn)	<p>I am writing on behalf of the British Horse Society (BHS) a membership charity with over 112,000 members representing the UK’s 3 million regular riders and carriage drivers, in response to the current consultation on the Fareham Borough Local Plan. The BHS is the largest and most influential equestrian charity in the country, working to improve the lives of horses and their owners through its four core foundations of education, welfare, safety and access. 1. BACKGROUND TO OUR COMMENTS Nationally, it is estimated that there are 3.5 million people in the UK who ride or who drive a horse-drawn carriage. Hampshire has among the highest densities of horse ownership in the country (source: former National Equine Database). We estimate that 220,000-270,000 are employed in equine industries and the equine industry is estimated to be contributing at least £7 billion each year to the local economy, mainly through goods and services supplied by small businesses such as feed merchants, vets, farriers, trainers, saddlers, etc. Road Safety is a particular concern to equestrians, who are among the most vulnerable road users. Between November 2010 and March 2019, the BHS received reports of 3,737 road incidents, in which 315 horses and 43 people were killed. Research indicates however that only 1 in 10 incidents are being reported to the BHS; in 2016-17 alone, 3,863 horse riders and carriage drivers in England and Wales were admitted to hospital after being injured in transport accidents. (NHS Hospital Episodes Statistics). The BHS actively campaigns to improve road safety by making motorists aware of what to do when they encounter horses on the road (see <a href="https://www.bhs.org.uk/our-work/safety/dead-slow">https://www.bhs.org.uk/our-work/safety/dead-slow</a> – we recommend taking a few minutes to watch the ‘Dead Slow’ virtual reality film for an</p>	<p>The first part of the respondent’s comments relate to the Fareham Borough Local Plan consultation, which is of course not relevant to the SPD.</p> <p>The SPD cannot create or amend planning policies as this is the role for the Development Plan, nor can it create or amend policies for the management of coast, as this is the role of Shoreline Management Plans. The SPD can provide guidance to help implement coastal adaptation planning policies. Where relevant to the implementation of coastal adaptation planning policies guidance relating to access along the coast will be included within the SPD, including as related to the rollback and relocation of development.</p>	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>impression of how vulnerable equestrians are in proximity to cars and lorries). Because of the difficulties that equestrians encounter on roads, they avoid using them wherever possible. Road use is often unavoidable, however it is simply because people have nowhere else to exercise their horses. The main off-road access available to them is the network of Rights of Way (RoW). England and Wales have over 140,000 miles of RoW, but only 22% of this network is available for horse riders (who may only use routes designated as Bridleways and Byways) and a mere 5% to carriage drivers (who only have access to Byways). An additional factor is that the network is fragmented, and roads are often the only available links between one RoW and the next.</p> <p>2. COASTAL ADAPTATION SUPPLEMENTARY PLANNING DOCUMENT INITIAL CONSULTATION</p> <p>a. Are there any elements of National or Local Planning Policy which should be particularly emphasised/explained in the SPD? Yes</p> <p>b. What guidance for development in the Coastal Change Management Area should be identified in the SPD? Guidance for development in the Coastal Change Management Area should include guidance regarding access, including the BHS leaflet for developers and planners enclosed with this letter. A document such as the ‘Equestrians in Hampshire – a reference guide for Transport, Planners, Developers and other decision makers’ mentioned below should be developed for each county and used for Norfolk and Suffolk. At very minimum developers should be aware of their duties regarding ‘Public Rights of Way affected by coastal and estuarine change or management’ provided by Suffolk County Council at: <a href="https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/rights-and-responsibilities/public-rights-of-way-affected-by-coastal-and-estuarine-change-or-management/">https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/rights-and-responsibilities/public-rights-of-way-affected-by-coastal-and-estuarine-change-or-management/</a></p> <p>c. Are the categories identified in section 3</p>		

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

Respondent	Comment	Partnership Response	Changes Made
	<p>access for equestrians and a documented lack of provision. The issues identified in the Norfolk Access Improvement Plan 2019-2029 which states ‘The network of bridleways, restricted byways, byways open to all traffic and unclassified country roads (UCRs) across Norfolk is sparse and scattered with a minimal number of joined up circular routes’. We hope that the Coastal Adaptation Supplementary Planning Document will take the opportunity to address the disjointed nature of Norfolk and Suffolk’s Right of Way network and should include: a. Recognition of equestrians as vulnerable road users Historically, pedestrians and cyclists have been considered as the main vulnerable road users. Equestrians are however increasingly recognised as being part of this group: during the Parliamentary Debate on Road Safety in November 2018 Jesse Norman, Under Secretary of State for Transport, stated that “We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders.” We therefore ask that the Coastal Adaptation Supplementary Planning Document includes Norfolk and Suffolk’s equestrians as vulnerable road users, to ensure that their needs are considered equally alongside those of pedestrians and cyclists. b. Equestrians to be included in any shared-use routes, wherever possible in order to maximise opportunities within development to help provide more off-road links for equestrians, where shared-use routes are created for active travel as a part of any development, planning policy should support the automatic inclusion of horse riders on shared off-road routes, unless there are specific reasons why this is not possible. Conflict with cyclists is sometimes given as a reason for excluding horses from shared routes, but this rarely has anything to do with either the horse or the bicycle, simply the inconsiderate person who happens to be riding one or the other. Horse riders and</p>		

Respondent	Comment	Partnership Response	Changes Made
	<p>cyclists as two vulnerable road user groups have more in common with each other than differences. This is illustrated by the work that the BHS are doing in partnership with Cycling UK in the current ‘Be Nice, Say Hi!’ campaign and with Sustrans in their ‘Paths for Everyone’ initiative. The key to a successful shared route is the design: for example, rather than positioning a cycle path down the centre of a route with verges either side, the cycle path should be positioned to one side and the two verges combined to provide a soft surface for walkers, runners and horses on the other. (This also addresses the issue of horse droppings which, as research has confirmed, represent no danger to health and disperse quickly, particularly on unsurfaced paths.) 4. CONCLUSION Horse riding is a year-round activity which (along with associated activities such as mucking out and pasture maintenance) expends sufficient energy to be classed as moderate intensity exercise. The majority of those who ride regularly are women, and a significant proportion of riders are over 45. For some older or disabled people, being on horseback or in a horse-drawn carriage gives them access to the countryside and a freedom of movement that they would not otherwise be able to achieve. There are also considerable psychological and social benefits from equestrian activities, as the BHS is demonstrating through the Changing Lives through Horses initiative. Equestrianism is a popular activity in both of the counties of Norfolk and Suffolk, and one which contributes significantly to the local economy. The equestrian community in Norfolk and Suffolk currently have many difficulties in finding safe access within the area, mainly as a result of past development. Many of these issues could be addressed and resolved through good planning of future development. We hope therefore that the Coastal Supplementary Planning Document will include policies that will support this.</p>		

<b>Respondent</b>	<b>Comment</b>	<b>Partnership Response</b>	<b>Changes Made</b>
Norman Castleton	The routes to obtaining the necessary finance.	The draft SPD provides some guidance relating to funding development and/or coastal management measures. However, the purpose of the SPD is not to provide financial assistance but to aide the implementation of coastal adaptation planning policies.	Identify potential funding mechanisms for the implementation of coastal adaptation planning policies
Bungay Town Council (Jeremy Burton)	A ring main system would be preferable to one-to-one windfarm access to the shoreline. Coastal management is another issue and any changes in the sea will have an effect at some point along the coastline. Any coastal management subsequently required should also be funded by Central Government.	The SPD cannot create or amend planning policies as this is the role for the Development Plan, nor can it create or amend policies for the management of coast, as this is the role of Shoreline Management Plans. The SPD can provide guidance to help implement coastal adaptation planning policies.	No change.
Norfolk County Council - Natural Environment Team (Catherine Dew)	Green Infrastructure and establishing measurable biodiversity net gain should be a fundamental part of development proposals/asset relocation (not an after-thought). There is potential for creating new habitats which benefit both Norfolk's biodiversity and recreation. Green roofs will help mitigate the effects of climate change for example by reducing the carbon footprint of buildings.	The SPD will set out the affects that coastal processes and policies can have on the natural environment. The SPD will provide guidance for biodiversity and the natural environment where relevant to the implementation of coastal planning policies, however it cannot create or amend planning policies as this is the role of the Development Plan.	No change.
Norfolk Police (Penny Turner)	Having examined this on the portal link provided, Norfolk Police will not be commenting at this stage but look forward to more input on the forthcoming draft document.	Comment noted.	No change.
Blue Sky Leisure (Paul Timewell)	Together with Glyn Davies, of Glyn Davies Planning, we advise Blue Sky Leisure (BSL) in respect of planning matters on a number of sites in the Company's control, including an established Caravan and Camping site on the cliff top at Woodhill Park, East Runton, nr Cromer - in the North Norfolk District Council area. We appreciate that the SPD is still in its early stages and this current consultation is more about its suggested content, but we are pleased to have the opportunity to get involved and help shape the document. Over the years together with BSL, we have developed considerable knowledge and experience in working with	Support and comment noted. The rollback development mentioned forms part of the case studies appended to the draft SPD.	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>North Norfolk District Council to develop Local Plan policies dealing with coastal adaption The Company has also successfully implemented the Council’s Local Plan ‘roll back’ policy to relocate vulnerable cliff top caravan pitches at Woodhill to an inland location. More recently, we are presently engaging with North Norfolk Council Officers, concerning the latest impact of cliff erosion on Woodhill's operations and discussing how best to deal with these impacts. Consequently, we are very interested in the emerging SPD. BSL would be happy to share advice, its experience and knowledge dealing with the impacts of coastal erosion on its business, and how issues have been overcome in the past and potential opportunities for overcoming issues in the future. Please do contact me in the first instance should this be of interest.</p>		
<p>Nigel Doyle</p>	<p>Further to the consultation that you are currently undertaken, please find attached a copy of a Chief Officer’s note on the subject recently produced, following consultation, in Cornwall. The topics in it seem equally relevant to East Anglia and hopefully it will assist.</p> <p>Attachment:  <a href="https://eastsoffolk.inconsult.uk/gf2.ti/af/1172354/300644/PDF/-/final-chief-planning-officer-note-planning-for-coastal-change-march-2020.pdf">https://eastsoffolk.inconsult.uk/gf2.ti/af/1172354/300644/PDF/-/final-chief-planning-officer-note-planning-for-coastal-change-march-2020.pdf</a></p>	<p>The content of Cornwall Council’s planning note on coastal change from March 2020 addresses coastal adaptation planning policy from the Cornwall Local Plan, relevant Shoreline Management Plans and while the policies are different to those set out in the SPD area some of the context is relevant, particularly in relation to national policy, guidance and legislation.</p>	<p>No change.</p>
<p>Norfolk Coast Partnership (Gemma Clark)</p>	<p>Some general comments include:- How the Heritage Coast designation is included as part of the safeguarding of the coast Tools such as LCA and LVIA’s and their importance in addressing landscape impact. The role of AONB’s both in protecting our coast and through working in partnership finding opportunities for enhancement that benefits landscape, biodiversity and people.</p>	<p>The draft SPD provides guidance relating to coastal adaptation planning policies and the impact of the implementation of such policies on environmental designations, to avoid harm and ensure appropriate mitigation where necessary.</p>	<p>No change.</p>
<p>Norfolk County Council - Lead Local</p>	<p>Please ensure reference to the LLFA Guidance document and its contents is included. This document and the principles</p>	<p>The draft SPD provides guidance on the implementation of coastal adaptation planning</p>	<p>No change.</p>

Respondent	Comment	Partnership Response	Changes Made
Flood Authority (Sarah Luff)	within it should be promoted as widely as possible as it addresses a large amount of general questions about the LLFA requirements and the LLFA review process. An update of this document is currently being prepared and should be published by the end of the year. We can confirm that at present the requirement for consents to works on ordinary watercourses and for any work that will impede the flow would remain. Furthermore, we recommend that consideration of any local flooding records are made and reflected in any site development proposals.	policies. However, the draft SPD also sets out the roles of responsibilities of organisations operating and managing on the coast.	
Felixstowe Town Council (Ash Tadjrishi)	A) Mapping Good mapping is desperately needed, and essential, including but not limited to: Precise seaward and landward extent of the CCMA's 30m zone. The mapping in the LP is inadequate. This should be done at scales appropriate to the area involved: in built up areas large scales are essential. For HTL areas, the new LP extends part of the concept from the CCMA to define an area of typically 30m from current defences to ensure future maintenance access is not inhibited, and where appropriate to require Erosion Vulnerability Statements to be provided in planning applications. The SPD should map those areas at large scale so that all parties can see the implications clearly. Similarly, "coastal maps" for individual areas should clearly incorporate the SMP designations, at scales appropriate to the type of location. They should also contain easily used links to the current EA Flood Zone mapping, or software can be utilised, direct to that from the EA website. B) Implications for resort frontages. In coming decades seafront infrastructure will be directly affected by Sea Level Rise. Promenades and their immediate hinterlands (e.g. in Felixstowe the Spa Gardens) will need to adapt. Higher and more robust structures will be needed to protect the usability of current assets, possibly glass flood walls, or other wholly new thinking. While this is hopefully some decades	<p>The draft SPD does not contain new maps of existing metrics set out in Shoreline Management Plans or Local Plan policies. However, the Partnership is open to the idea of preparing maps that would aid the implementation of coastal adaptation planning policies.</p> <p>The SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs).</p> <p>The draft SPD provides guidance relating to the implementation of coastal planning policies within both the Local Plans and National Policy but cannot create new, or alter existing, policy. Guidance is provided on the preparation of Coastal Erosion Vulnerability Assessments to ensure development proposals are safe over their planned lifetime.</p>	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>away, current maintenance and development of resort facilities should be aware of these future issues. In particular the decorative walls to the rear of Felixstowe promenade will need to be replaced with wave-resistant structures, possibly within a decade. Whether by general phrasing, or by locally specific sections, these issues should be outlined. C) Flood risk in South Felixstowe. In South Felixstowe we have a situation with a very low risk of a very severe flood event. i.e. there are two scenarios which the SPD should include in planning advice: i) A very exceptional tidal event could, even today, generate tides a further metre above previous events, and that will become progressively more likely over time. In that event flooding in the Langer Road area could be a metre more severe than in 1953. ii) Even in a less severe event, the possibility should be accounted for that the existing defences could fail, either by damage from severe wave action, or by an operational failure if the flood gates were not close for some unforeseen reason, including the eventuality that severe weather could impede access to the town for Norse / EA staff to close the gates. With the current recent change to EA Flood mapping, the area has been reduced from Flood Zone 3 to Flood Zone 2, apparently because the mapping omitted the presence of defences along the frontage, as indeed also on the Golf course frontage. Hopefully that will be reversed – it is under investigation. However, the SPD should reinforce NPPF advice that developments in such areas should be “safe for the lifetime of the development. That should encompass no sleeping accommodation on the ground floor, and no single-storey residential accommodation without an internal escape route to first floor level. We believe this type of advice is properly admissible under the NPPF and does not constitute “new policy”.</p>		

Respondent	Comment	Partnership Response	Changes Made
J E Blanchflower	<p>The coast from Holkham to Felixstowe is one of East Anglia's most important assets in terms of the natural beauty of the sections where there is little or- no development. It is important that these sections are preserved and natural processes are allowed to take place. Failure to respect this will result in overdevelopment such as along the south coast. 'Public realm infrastructure' [I think I understand what the jargon implies] has already had a substantial impact (Felixstowe Docks, Sizewell A &amp; B, Bacton Gas installation, numerous caravan parks in the Lowestoft/Gt Yarmouth area to name a few) and should not expand further into natural habitats.</p>	<p>The draft SPD sets out the impacts that coastal processes and policies can have on the natural environment and provides guidance in relation to the avoidance of harm to the special qualities of environmental designations.</p> <p>The SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs). Nor can the SPD create new or amend existing planning policies as this is the role of the Development Plan and National Policy.</p>	No change.
Lowestoft Cruising Club (David Bennett)	<p>The Lowestoft Cruising Club (LCC) is located at the western end of Lake Lothing. Our activities encompass cruising local and more extensive waters in sailing and small motor vessels. Our site is subject to flooding during tidal surges. We therefore fully support the Lowestoft Flood Risk Management Project which is shortly to be undertaken with raised sea walls and a flood barrier just east of the current bascule bridge. This should alleviate flooding in Lake Lothing and at the LCC site. The maintenance of an operational port of Lowestoft, which is owned and operated by ABP, is essential to LCC activities. We have been involved in the Planning Inquiry and discussions with Suffolk County Council (SCC) on the construction of the Gull Wing third crossing of Lake Lothing. There are potential adverse impacts on the activities of all vessels operating from the western end of Lake Lothing. There are extensive plans for redeployment of land surrounding Lake Lothing. It is essential that the Coastal Adaption SPD provides guidance on such coastal developments and the consequences for all users of Lake Lothing. It is issues like these that need to be covered by the Coastal Adaption SPD. While they are specific issues, and the</p>	<p>The Partnership has considered these points, but considers in general that they relate more to flood risk than coastal erosion. The flood risk and planning situation in the Lake Lothing area is considered in the Waveney Local Plan (2019) and Shoreline Management Plans. Moreover, the SPD cannot comment on specific development proposals, but provide guidance relating to the general implementation of coastal adaptation planning policies only.</p>	No change

Respondent	Comment	Partnership Response	Changes Made
	Coastal Adaption SPD is covering a large extent of coastline, local issues need to fully considered.		
Marine Management Organisation (Stacey Clarke)	Many thanks for giving us the opportunity to respond to the Coastal Adaptation Supplementary Planning Document, covering the coast from Holkham in Norfolk to Felixstowe in Suffolk. Please find attached our response letter which contains general marine planning information and legal responsibilities as well as specific consideration for the Coastal Adaptation SPD. In addition to this, if you, or any of the other relevant authorities, would like further information on the East Marine Plans, I would be happy to provide a meeting covering general information on marine planning, monitoring and implementation of the east marine plans, tools for implementation and an update on the development of marine plans in England.	Marine and terrestrial planning are inherently linked, and consideration has been given to the relationship between the development plans for the SPD area, the Shoreline Management Plans, and the Marine Plans. The draft SPD provides some guidance as to the role of marine planning regime in the wider context of the implementation of coastal adaptation planning policies of the terrestrial development plan.	No change
Paul Bailey	The objectives of the SPD are well defined. You are correct the issues are relatively simple; the erosion of land and rise in sea level.... as King Canute clearly demonstrated. The extent of the problem can easily be identified by superimposing or overlaying the two elements on a plan. This would also show the potential inland flooding which would approach from a different direction and enable a rear-guard action plan. But surely, this already exists and current actions are in place to ban residential building and restrict commercial development in the defined areas. Is the purpose of the SPD is to recommend the parameters e.g. 1 kilometre from shore and 5 metres from current high tide level. The implications, this is the really difficult question. The previous analysis would identify assets at risk. These could be graduated on a more detailed risk assessment. Everyone must be involved and consulted, the potential costs and social disruption will be huge. A detailed plan and financial impact analysis needs to be completed as soon as possible. This should be the primary function of the SPD. I	Shoreline Management Plans are the main mechanism for deciding on the appropriate management regime for the coast, with Local Plan policies also playing a part; the SPD cannot do so (as it can only provide further guidance and support on the implementation of Local Plan policies). The Environment Agency is the key organisation working on flood risk matters, and the councils work closely with it.	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>think the impact study and roll-back plans will take significantly longer than establishing the development recommendations. Although intrinsically linked the first should not be delayed at the expense of the latter. Overall I agree we need a holistic collaborative approach, the coast is dynamic and our actions need to be equally so. The number of bodies involved needs to be small, impartial and empowered. Remember, the camel is a horse designed by a committee, we do not have that luxury if the forecasters are correct. Finally, we should not be reinventing the wheel, our close friends in the Netherlands have potentially greater issues than Norfolk.</p>		
<p>Somerton Parish Council (Gill Lack)</p>	<p>1. The coronavirus restrictions have prevented us from carrying out normal meetings where members of the public can attend. The same restrictions apply to District Councils. It should be accepted that conducting a consultation during these difficult times is not appropriate since a significant proportion of the population may not be aware of it and/or unable to participate with a response. 2. Currently, we have the Broads Futures Initiative (BFI) consultation/project ongoing. This particular consultation should include and address the same points raised in this particular consultation. We therefore request that the Supplementary Planning Consultation(SPC) be postponed until the BFI project is completed. 3. The BFI consultation/project aims to work closely with local people, listen to their views with the decisions made by elected representatives. The process hopefully will include opportunities for local people to ask questions and make suggestions regarding the same, if not similar, points to that raised in the SPC consultation. How can people respond to the SPC consultation without having the latest information regarding flood risk, land levels etc etc.?</p>	<p>The limitations imposed by Covid have made things difficult, as stated. However, local authorities have tried to maintain their normal work activities and given that it was not known how long social distancing would need to be maintained, local authorities had to do the best they could to allow engagement (putting documents online, using social media etc) and continue progressing important pieces of work – such as the SPD. There was a very good response to the initial SPD consultation.</p> <p>This SPD and the Broadland Futures Initiative (BFI) operate within the same topic area, that of coastal change. However, the SPD is very much focussed on providing guidance relating to the implementation of planning policies, whereas the BFI is looking to inform the overarching flood risk management strategy for the next 100 years over a much wider area. The SPD and BFI can complement each other, and the SPD need not be restricted by the timings of the BFI.</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
Woodton Parish Council (Yvonne Wonnacott)	Woodton Parish Council views the joint approach by the Counties as a positive way forward in the right direction and we will wait to hear further developments.	Comment noted.	No change
Andrew McDonald	Thanks for the opportunity to comment at the outset of the consultation.	Comment noted.	No change
Burnham Overy Parish Council (Sarah Raven)	It would be helpful to have a stronger voice where all parish councils along the coast joined forces and that perhaps resilience groups that are proactive help more than being post active after the event has happened.	The Norfolk and Suffolk Associations of Local Councils (NALC and SALC) may be able to assist, but this is not a matter directly for the SPD. Resilience groups do a great deal of proactive work in relation to planning for emergencies and are not just reactionary.	No change
Andrew McDonald	I am writing to raise one particular issue on behalf of a small group of local residents who have been involved recently in leading the opposition to the inappropriate use of Enabling Development in East Suffolk – specifically over the last two or three years in the context of raising funds for river defences. We’d like to offer this point of view on the contents of section 5 of the document, ‘Delivery and Enabling Development’. Previous experience of the proposed (and actual) use of Enabling Development by the then Suffolk Coastal D C (and the statements in sections 3.72-3.74 of the recently adopted East Suffolk Local Plan) give us cause for concern that Enabling Development may be regarded as a policy option, rather than an exceptional mechanism. It is also difficult to determine from the consultation document exactly what form this ‘option’ would take – would ED be used as a fundraising mechanism to defray the cost of relocation? Or would it be used as a mechanism for siting relocated housing in areas which would normally be inaccessible to development? In either case, it is important to take very seriously the restrictions on the use of Enabling Development – as the current Local Plan states, it requires ‘..exceptional individual circumstances..’, and its use in exceptional circumstances ‘... needs to be justified,	Paragraphs 3.72-3.74 of the Suffolk Coastal Local Plan (SCLP) demonstrate the importance of a plan led system by noting that enabling development may be accepted in exceptional circumstances – in other words, every such case needs to demonstrate the particular justification to warrant a departure from the Local Plan, and the bar is high.  Plan-led approaches helpful to relocation and rollback can be practised. Waveney Local Plan Policy WLP6.1 is an allocation of 220 new dwellings in Reydon, of which seven are reserved for people whose properties have already been lost to erosion, or are at high risk of being lost soon. But there will always be occasions where a case is made for enabling development, which cannot have been envisaged by the Local Plan.	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>transparent and deliverable as a comprehensive package, with clear community benefits.’ {para 3.73}. It cannot be adopted in advance as a potential funding or development option, and it is surely preferable for East Suffolk Council to use the existing planning system appropriately, rather than to seek to rely on mechanisms that avoid the planning regulations that have been adopted to protect the community and its environment. We’d be happy to discuss this further, or to contribute otherwise to the consultation.</p>		
<p>Cornerstone Planning Limited (Alan Presslee)</p>	<p>Thank you for consulting on the Draft Coastal Adaptation Supplementary Planning Document (SPD). I hereby respond on behalf of the Royal Cromer Golf Club. The club is located on the cliff top – east of Cromer – and has seen its land slowly eroded over the years. The club is looking at options for its future security/viability, including possible planned contingencies to replace golf holes close to the cliff top, which are under imminent threat of loss through coastal erosion. The Golf Club welcomes the Councils’ initiative in developing plans for Coastal Adaptation. Nobody would suggest that there should not be appropriate consideration of the environmental impacts of new development in sensitive coastal areas. However, planning policies need to be applied with flexibility and pragmatism, and there should be a rounded consideration/appreciation of the commercial, operational and practical constraints presented by losing land to the sea, and combating same. In the case of a golf course the loss (or threat of loss) of a one or more golf holes doesn’t just represent a small, proportionate loss of some operational land: the loss of a golf hole makes the course unviable (it has to have 18 golf holes!). The noun ‘Adaptation’ is in the title of the document; so, the ability, facilitation and support (from Councils) to be able to adapt - commercially and environmentally - is absolutely crucial in the changing ‘climate’. Cromer Golf Course (and many other</p>	<p>The Partnership notes the comments and recognises the challenges that many coastal golf courses face in relation to coastal erosion. The draft SPD provides guidance relating to the rollback and relocation of development, which will be relevant to the rollback and/or relocation of golf course holes.</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>seaside golf courses) is in a location where – few would argue – planning permission is unlikely to be forthcoming if applied for today, given the myriad of environmental, ecological and landscape constraints on the coast. Yet, with the passage of time and the implementation of sensitive and proactive environment policies in the management of the golf course, the course is in harmony with its surroundings/environment. In being able to adapt to coastal erosion, and support the local economic, recreational and environmental benefits of the golf course, we are looking for the support of planning policies and this SPD (as a material consideration) to – in principle – enable the golf club to properly plan and adapt, developing potential replacement golf holes and other facilities, provided this is done to a high standard and with regard to the sensitivities of its location. In light of this we would like to see golf courses – and the coastal change and adaption issues that face them – addressed in the SPD and in any designation of a Coastal Change Management Area, and policies applicable thereto. Specifically, that the ability for a golf course to address the necessary (or in some cases anticipatory) creation of new golf holes or other golf club related facilities, is acknowledged and addressed directly. We believe that such would be appropriate, and in the context of relevant policies relating to coastal change in the National Planning Policy Framework. Please keep me apprised of the SPD’s progress, including subsequent stages of consultation.</p>		
<p>Historic England (Andrew Marsh)</p>	<p>Thank you for consulting Historic England on the draft Coastal Adaptation SPD initial consultation document. As the Government’s adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. While we do not have the capacity to provide detailed comments at this stage, we</p>	<p>The draft SPD recognises the importance of the historic environment to this part of the Norfolk and Suffolk coast, however, it is considered that guidance relating to how the historic environment can be appropriately preserved and enhanced is best addressed in other guidance documents at a local and national level.</p>	<p>The draft SPD recognises the importance of the historic environment along the coast and the important role that Historic England play in conserving the historic environment.</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>wish to flag the following matters which we hope that you'll find helpful. Historic environment The Coastline between Holkham in Norfolk to Felixstowe in Suffolk is rich in heritage, and we consider that the SPD represents an important opportunity to highlight the need to consider historic environment sensitivities when determining future proposals. We suggest the following typologies may be helpful in considering impacts on the historic environment:</p> <ul style="list-style-type: none"> <li>• Coastal terrestrial - Heritage assets on dry land - built or archaeological - which could be affected by development proposals, e.g. via change in their setting affecting views to and from and asset, lighting, noise, movement, vibration etc;</li> <li>• Intertidal zone - Heritage assets within the intertidal zone. These could be directly impacted, or as before, could be affected by changes in their settings, for example development in one location resulting in changes to coastal processes affecting heritage assets in another, or as with coastal terrestrial by other factors affecting how they are experienced - for example views to and from, noise, lighting etc. It is also relevant to highlight that there are numerous undesignated heritage assets which are considered of national importance within this zone, but which have not been designated because of the perceived difficulties in preserving and enhancing these in accordance with the statutory duties due to their nature and location.</li> <li>• Marine - Archaeology in and beneath the sea bed, including buried archaeological remains, old land surfaces and the associated palaeoenvironmental evidence that provides information about past climate and environmental changes, as well as artefacts (wrecks or evidence of wrecks). Again, such places could be directly impacted, or as before, could be affected by changes in their settings. Setting of heritage assets The NPPF makes it clear that the setting of heritage assets can contribute to their significance, and in these instances the</li> </ul>		

Respondent	Comment	Partnership Response	Changes Made
	<p>onus is on applicants to demonstrate that their proposals would not adversely affect these assets via a change in their settings. It is worth stressing that considerations of setting from a historic environment perspective go beyond visual changes (e.g. views to and from a heritage asset), but can encompass anything that affects how an asset is experienced, for example noise, movement, vibration, and lighting etc. In the context of this SPD, this could include unintended consequences to coastal process that result from development in one location, for example increased erosion or deposition etc. which adversely affect heritage assets in another location. On this basis we strongly recommend that the SPD include reference to the importance of setting where this contributes to the significance of heritage assets, and that this be a consideration when assessing development proposals. Other relevant Plans or policies A published East Marine Plan exist (published April 2014) which was the first one completed but it does include a section on coastal adaptation with Policy CC1 and there is also a section on 'Coastal change management' (paragraphs 249-252) - We suggest that it would be helpful if the SPD contained a section highlighting this and any other relevant policy, legislation and guidance which should be referred to be applicants and decision makers. Zoned approach to planning A general matter across all the questions is whether specific action should be taken to consider a zoned approach to planning i.e. in recognition of risks associated with coastal erosion or areas with anticipated increased risk of tidal flooding and therefore what action is necessary to record before loss of heritage assets in those zones - Coastal change Finally it will also be important to consider how matters related to 'coastal change' are considered through planning mechanisms - Conclusions I hope that you find the above comments</p>		

Respondent	Comment	Partnership Response	Changes Made
	<p>helpful. We'd like to stress that this response is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise as a result of this plan, where we consider that these would have an adverse effect upon the historic environment. If you have any questions with regards to the comments made then please do get back to me. I would be very happy to meet to discuss these comments further. In the meantime we thank you for making us aware of this SPD and look forward to receiving subsequent consultations on this matter.</p>		
<p>Environment Agency (Martin Barrell)</p>	<p>Thank you for consulting us on the Draft Coastal Adaptation Supplementary Planning Document, covering the coast from Holkham in Norfolk to Felixstowe in Suffolk. We support the holistic approach taken in the production of this document. The SPD presents an opportunity to provide consistent advice across the whole of the coast for the area covered. We would agree that the scope and proposed content of the document both look to be appropriate, and the document appears to be consistent with the National Flood and Coastal Erosion Risk Management Strategy. It will be beneficial to have such a document to reference the Shoreline Management Plan policy decisions for each area, particularly as we move into Epoch 2 of the SMPs. For all types of development proposed in CCMA's affected by flood risk, you should consider whether specific guidance needs to be provided on how that risk should be addressed. This may include how to appropriately apply the Sequential Test, and the measures required to ensure the safety of the development over its defined lifetime. This may also be applicable to roll back/relocation proposals, or enabling development. We would be happy to discuss this point</p>	<p>Appropriate references to SMPs have been made in the SPD and the document considers different kinds of developments and infrastructure and the particular challenges and opportunities that they give rise to. However, the SPD has focussed primarily on risk arising from coastal erosion and as a result does not provide guidance relating to the sequential test.</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
	further if required. We would welcome the opportunity to further review the SPD as the document is developed.		
National Grid Ventures (Alicia Dawson)	National Grid Ventures (NGV) are aware that East Suffolk Council together with Great Yarmouth Borough Council, North Norfolk District Council, the Broads Authority, and the Coastal Partnership East Team are consulting on the Coastal Adaptation Supplementary Planning Document (SPD) from 4th September to 16th October 2020. The SPD will cover the area of coast from Holkham in Norfolk to Felixstowe in Suffolk. East Suffolk Council will be familiar with NGV through our engagement with the Council to date on the proposed Nautilus and EuroLink Interconnector Projects. However, a brief introduction to NGV and our proposals in East Suffolk are set out under the headings below for the benefit of the other parties hosting this consultation. It is noted that the consultation document sets out the proposed structure of the SPD and that following this current consultation, a draft version of the SPD will be prepared for public consultation before being adopted by all of the partnership authorities. NGV would welcome the future opportunity to review and comment on the draft SPD document once published for public consultation. It is understood that the SPD is intended to provide clear guidance as to what development may be appropriate in the Coastal Change Management Area (CCMA) and in what circumstances. In this context it is relevant to introduce NGV's proposals in East Suffolk.	Comment noted.	No change
Peter Terrington	Whilst erosion is recognised as a threat along the cliff coastline, east of Weybourne, the DLSA does not appear to recognise the threat caused by accretion of sand along the sand dune and marsh coastline, west of Weybourne. Accretion of sand in Wells and Blakeney harbours is creating economic, recreational and environmental impacts. There is strong circumstantial evidence to link the increased rate of	The comments are noted but they do not directly relate to the SPD as they relate more specifically to activities in the marine planning realm that potentially impact coastal processes and then therefore impact coastal communities, businesses and the environment. As such, these matters are more appropriately addressed by the relevant	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>accretion of sand in Wells and Blakeney harbours with the commencement of dredging and channel Deepening at Wells and placement of dredged spoil within the marine environment. Increased accretion of sand is also contemporaneous with the development of offshore wind farms and the trenching for cable routes. Obviously natural processes play a huge part in the erosion, transport and deposition of material along the North Norfolk Coast, but little research has been carried out about the part played by human intervention. Observations since 2009 suggest that the rate of accretion of sand has greatly increased. This has had a devastating impact on the mussel fishery at Morston, resulting in the virtual closure of the fishery, putting a number of mussel fishermen out of work. Increased accretion of sand in Wells and Blakeney harbours is also impacting on the offshore fishing industry and the recreational boating interests, as well as impacting on wildlife through the loss of feeding grounds. It is now necessary to regularly dredge inner harbour to keep the channel to the Quay open and around the pontoons at the Main Quay and at Tugboat Yard. Boating interests at Blakeney are seriously investigating the need to dredge Blakeney Harbour. The Wash &amp; North Norfolk Marine Partnership (Formerly the Wash &amp; North Norfolk EMS) has set up a Siltation Working Group to investigate the accelerated accretion of sand along the coastline and in the tidal inlets and it is forming partnerships with other bodies to try to find out why the rate of accretion has dramatically increased over recent years.</p>	<p>Marine Plan and Shoreline Management Plan, as opposed to the development plan and this draft SPD.</p>	
<p>SCEG - Scratby and California Environment Group (Lodge)</p>	<p>Adaption. As much detail to assure public that adaption is explained and as much guidance given as possible.</p>	<p>Relevant detail on adaptation (including links to other guidance) is provided in the draft SPD.</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
Southwold Town Council (Lesley Beevor)	Main issues are what development is permitted and relocation in case of loss of property due to erosion. Southwold shoreline (Walberswick to Easton Bavents) is shown in Appendix A as having little change to 2055. However the cliff at the end of the northern seawall at Easton Bavents may be breached on a shorter time than that (10-30 years). This opens up quite a large number of properties (~100) in North Southwold and South Reydon to risk from tidal surges. The current CMP policy is to allow a shingle bar to develop, backed up by defence along border of marsh. Given the scale of the problem, and the number of properties potentially affected, the issue perhaps need to be spelt out.	Matters relating to coastal management are for the SMPs to consider, alongside Local Plans, but the SPD cannot directly impact these issues.	No change
Suffolk County Council (AONB Team) (Beverley McClean)	Thank you for consulting the Suffolk Coast & Heaths AONB team on the Draft Coastal Adaptation SPD consultation. The AONB team have the following comments to make on the consultation which we hope can be incorporated into the final SPD. 1 Purpose of the SPD In addition to the objectives identified, the objectives of Coastal Adaptation SPD should also include the following objectives: • Provide guidance for temporary uses of land and buildings. • Set out the approach to relocation of residential properties. • Set out the approach to ‘roll back’ for commercial uses and essential infrastructure 2. Coastal Change The AONB teams supports the cross boundary integrated approach being proposed for the preparation of the Coastal Adaptation SPD. We would ask that the Coastal Change Chapter includes information on climate change impacts in estuaries and not just the open coast. Estuaries are an integral part of the coastal landscape of the Suffolk Coast & Heaths AONB. These too are dynamic and being impacted as a result of climate change and for this reason they should be included in the SPD. 3. Links to Shoreline Management Plans In addition to linking to SMPS 5, 6, 7 & 8, the SPD should also reference the need for any	The natural environment has been recognised for the significant, in scale and importance, role it plays along the coast and the benefits it provides communities and businesses along the coast. Reference has been made to the national and local planning policy context, including SMPs, the marine planning system, and of course the role of Natural England. Given the nature of rollback and relocation solutions and the scale of coastal environmental designations the importance of giving appropriate consideration to the natural environment in implementing rollback and relocation development has been recognised in the draft SPD.	No change

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

Respondent	Comment	Partnership Response	Changes Made
	<p>that may need to be relocated /rolled back may well be relocated/rolled back into nationally designated landscapes therefore the need to consider impacts on the natural beauty of the Suffolk Coast &amp; Heaths AONB and The Broads National Park should be included in this section of the document. 5 Delivery and Enabling Development The AONB support the inclusion of information clarifying the circumstances when enabling development may be supported to deliver public benefits. Some enabling development may be delivered in nationally designated landscapes therefore the need to consider impacts on the natural beauty of the Suffolk Coast &amp; Heaths AONB and The Broads National Park should be included in this section of the document. The Natural Beauty and Special Qualities are defined in the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Qualities Indicators Report V1.8 produced in 2016 by Landscape Design Associates Where enabling development is supported to fund new coastal defences for example the design of any defences should consider all impacts on the natural beauty of the Suffolk Coast &amp; Heaths and on the Broads National Park. The AONB team would like to draw your attention to the ‘Suffolk Coastal Sea Defences Potential Landscape and Visual Effects Final Report’ and its recommendations commissioned by the AONB and prepared by Alison Farmer as part of the Touching the Tide programme. We recommend that the Final Report and the recommendations in it are used to shape the content of the emerging Coastal Adaptation SPD. We hope these comments are helpful for the development of the Coastal Adaptation SPD.</p>		
Suffolk County Council (Georgia Teague)	Thank you for consulting Suffolk County Council (SCC) on the Coastal Adaptation Supplementary Planning Document. We have no comments to make on the draft document at this	Comment noted.	No change

Respondent	Comment	Partnership Response	Changes Made
	time. However, we request to be kept updated and engaged in the later developments of this document.		
Water Management Alliance (Jessica Nobbs)	What are the next steps? What is the scope?	The planned scope of the SPD was set out in the initial consultation document, and since has been updated to take account of consultation responses. The next steps are to publicly consult on the draft SPD, consider the consultation responses, amend the SPD accordingly and seek to adopt the SPD, after which it would become a material consideration in the determination of relevant planning applications.	No change
Deben Estuary Partnership (Christine Block)	No Comment	N/A	No change
Kathryn Newnham	Having viewed this document I am aware that I lack the expertise on coastal erosion, tides etc and in other areas. However i have an interest and awareness on certain points so I would like to try and contribute to your consultation. For many years now i have been environmentally aware of many issues David Attenborough has recently brought to the peoples attention. Whilst plastic is a big issue (PCBs?) I think they should find an environmentally friendly alternative - I would ban its production for many unnecessary uses, and completely when they find an alternative, I think chemicals and pollution both in the sea and air is a huge factor in climate change, as is destruction of the rainforests. To live todays life style where our factories churn out dangerous pollutants, the seas have fertilisers, petro-chemicals, sewage and goodness knows what else pumped into them everyday, mankind will eventually be responsible for its own demise. Along the way destroying all other forms of life. If everybody used things like environmentally friendly products (I have used them for years) along with natural things (Lemon degreases and is a good limescale remover in kettles, Vinegar etc.) our oceans and atmosphere would improve	Comments noted. The Councils have consulted a wide range of people and organisations, including the Norfolk Wildlife Trust, Environment Agency, Natural England and many others and is having appropriate regard to their comments.  Questions about overall housing numbers and particular planning applications are matters beyond the scope of the SPD, as is offshore dredging. However, the SPD will provide guidance to help manage development and rollback/relocation in coastal areas.	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>considerably. So whilst erosion is natural mankind has increased this process dramatically. Sea levels have risen and human activity around our coasts affects tidal movements. One instantly coming to mind is the dredging allowed off our coastline. Usually by companies from elsewhere (I think a company in Southampton applied for and got permission to dredge here!). Surely this must contribute to the erosion? If you remove the shingle (or whatever it is they gather) A process of displacement occurs, and cliffs like those at Happisburgh (who are soft material) disappear into the sea. Along with the houses and roads that used to have "Sea views"! When somebody does something along the coast someone elsewhere becomes a victim. Great Yarmouth outer harbour is a good example when completed caister and I believe it was Hopton lost a considerable amount of beach. I cannot comment for elsewhere in Norfolk and Suffolk only these incidents which I have known of, although I do know Scratby and Hemsby are in trouble with erosion. What I will say is please listen to the experts and people like the Norfolk Wildlife Trust, WWF, etc. local wildlife/environment experts must surely be of great importance with local knowledge of the areas concerned. A further comment on erosion is with regards to the south coast. Prior to moving to Norfolk we used to holiday on the south coast. I have seen swathes of cliff, roads and housing disappear into the sea around Hastings and recently Swanage became a victim of erosion (fortunately nobody was injured). This consultation document for which house building is its main purpose, I would suggest you go back to the government and request a great reduction in quotas. Norfolk and Suffolk are unlike other areas. You have grade one farmland - an important bread basket for our nation - it is wrong to import food when we should be growing our own (not concreting over the farmland with housing). these</p>		

Respondent	Comment	Partnership Response	Changes Made
	<p>counties are important to species of wildlife, migrating here in both summer and winter, and our own native species some of which are only found in this area (butterflies etc). This area should be treated differently to other parts of the UK. You cannot allow it to be developed in the same way as Essex, urbanised from London to Southend and the coast. It has the Broads, it is of great importance to the survival of species, you must not let it be a victim of the governments (and all parties) housing policy. In 2019 I wrote to the government ministry of housing and our MP Brandon Lewis as I realised that it was build 1,000s of houses - mostly on green fields - making a healthy profit at everybody else's expense. In January this year I wrote to Boris Johnson enclosing, paperwork relevant to the Great Yarmouth area for planning applications. For some years now we have been the target of developers. Recently this little village of Filby had over 40 planning applications lodged. We already had 60 houses built - it changes villages completely, Filby is being ruined and still they want to build 10-15-30-60 at at time. On Filby sands last year out of season and one way only we had 58,00 vehicles pass our front door. We didn't have the sams to register the summer traffic, it was probably nearer 100,000! your local planning policies have consequences for us residents. Is it fair our quality of life should be ruined to accommodate government housing policy and developers? I have viewed the paperwork on the core strategy and further focused changes for Great Yarmouth. I have returned the statement if representation form and hope the secretary of states planning inspector will allow me to speak at the hearing sessions because I would like to bring to his attention how the Part 2 further focused changes to 2030 came into being, to accommodate large developments. Persimmon Homes 725 (now slightly less) but the design is such that you can remove a few trees and build on the rest</p>		

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	<p>of Nova Scotia Farm. this was not an area in the sites for development - it is now - put so the developer could build freely without objection from the public! That's another 2,000 plus cars a day yo come through Filby on the A1064 and on the Norwich. Bradwell 600 dwellings, Gorleston 500 and another 11 dwellings - all coming under ADIA numbers 1- 9 and other under BR, GR6, HY1 and 071. These are listed in the further focused changes - however i found in other files what can be done! Rollesby site 36 - 15 units site 37 -40 units, site 90 1 unit, Site 9 - 4 units, site 320 - 10 units, site 322 - units, site 413 - 26 units, site 414 - 20 units, site 449 - 20 units. Filby site 10 - 60 units (they have an application in now for six 'gone to appeal' as it was refused planning). site 19 - 15 units, site 38 - 11 units, site 62 - 3 units, site 71 - 6 units, site 72 - 20 units, site 83 - 2 units, site 114 - 7 units, site 416 - 44 units, site 428 - 20 units. Some of these sites now have planning applications lodged! Additionally Martham and Ormesby St Margaret have been swamped with development applications as has Hemsby regardless of coastal erosion. I would suggest this is not a council with a local planning policy with the interest of the community at heart, but a council allowing developers access everywhere. For the future generations and nature you need to go back to the government and insist on a change to the building requirements issued for Norfolk and Suffolk - disobey them if necessary and stand up for the communities and future generations you will serve. Counties of concrete in an environmentally important area with the prospect of houses disappearing into the sea (Happisburgh and shortly it will be Hemsby) is a very stupid housing policy - not forgetting what the rest of us will lose. I hope my comments will make you think seriously at the housing policies you will be providing guidance on. I also ask that despite my opinions you will include me in any further correspondence on these policies.</p>		

Respondent	Comment	Partnership Response	Changes Made
	I also enclose some cuttings recently taken from the mercury about new housing applications, the volume may make you think about what is going on here. I have kept Filby paperwork as I use it to write to the council with my objection.		
Richard Adams	Reference Eyke 21, East Suffolk Council SCLP 12.50 - as I own the south east fence of the mixed use boundaries. - What are your plans for this issue?	The draft SPD is focussed on providing guidance for the implementation of coastal adaptation Local Plan policies, and does not provide guidance for other site allocations.	No change
Anglian Water Services Ltd (Stewart Patience)	No Comment	N/A	No change
Barton Willmore (Will Spencer)	No Comment	N/A	No change
Bidwells (Kate Hammond)	Please do not rule out coastal defence maintenance and improvements. This could be cheaper in the long run! We recommend there is working group established to include landowners to assist with the development of this document and provide more detail and explanation of the issues which are facing property owners and businesses in coastal areas. If you would like to discuss any of these points further please do not hesitate to contact us.	The management approach to the coast (e.g. protect/hold the line, no active intervention etc) is set out in the Shoreline Management Plans, and the SPD cannot change this.  The local authorities are undertaking work for potential new protection schemes (at Hemsby, for example) and in some cases, rollback will not be the preferred solution.	No change
Bourne Leisure Ltd (Lichfields)	The coastline covered by the SPD supports a tourism economy of regional importance. In Great Yarmouth alone, where Bourne Leisure has its holiday parks, tourism is worth £625 million per annum and accounts for 35% of all jobs. It is important that existing holiday parks in coastal locations are assisted by policy and guidance to ensure they can respond to circumstances, including coastal change, to maintain a quality service to their guests, continue attracting visitors and contributing to the local tourism economy, and to give operators confidence to plan for the future of their parks. This needs to be acknowledged in the opening section of the	The importance of camping and caravan parks to the coastal economy is fully recognised by the Partnership.  The draft SPD follows policy in providing that temporary development may be appropriate in the CCMA provided a number of criteria are met, including that such temporary development proposals are supported by a compliant Coastal Erosion Vulnerability Assessment.	No change

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	<p>SPD, to establish this important context. Principally, Bourne Leisure has four other key points that it requests are considered by the Councils in preparing the Coastal Adaption SPD. These are addressed in turn below. 1. Identify caravan holiday parks as being appropriate in coastal locations We note that the proposed content for the SPD includes a section on development in the Coastal Change Management Area (CCMA). Pg 2/3 18907555v2 We responded to the Great Yarmouth Local Plan Part 2 review recently in May 2020. The draft document has been submitted by the Council for Examination and includes a specific policy (GSP4, 'New Development in Coastal Change Management Areas') that identifies a CCMA and development considered appropriate within the area. This approach is consistent with National Planning Policy Framework guidance (NPPF, paragraph 167). In the Great Yarmouth example, parts of Caister-on-Sea and Hopton Holiday Parks are located within the CCMA and Seashore Holiday Park is directly adjacent to the CCMA. We endorsed the draft policy identifying holiday and short-let caravans as representing appropriate development that could be provided along the coastal strip in Great Yarmouth. This form of tourist accommodation and use of land by its nature is inherently more flexible, with the ability to easily relocate caravans and adapt caravan developments to respond to changing coastlines over time. In view of this, park operators may accept temporary planning permissions that allows development to be reviewed in light of the actual rate of coastal change. In this way, it is different from other forms of 'permanent' development, such as residential development, and it is appropriate that this is recognised in development plan policy and guidance in the Coastal Adaption SPD. 2. Allow operators to protect their properties from coastal erosion Tourism operators should be allowed to protect their</p>	<p>The SPD cannot create or change policy in the coastal area – this is reserved for Shoreline Management Plans and Local Plans. However, the SPD will provide assistance in the interpretation and implementation of relevant Local Plan policies and there have been a number of good case studies in recent years showing how councils can work with park operators to best manage coastal erosion threats. Ad hoc coastal defence works must be considered in light of the SMP policy due to the potential for unintended consequences on other parts of the coast.</p>	

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	<p>properties by investing in maintaining existing flood defences or providing new defences. This way private landowners are not dependent on public sector plans and investment to provide new or improved coastal defences, and initiatives can be led and funded by the private sector, as required and appropriate. We consider this principle should apply even in circumstances where such flood defence works are not provided for in Shoreline Management Plans (SMP). Otherwise this could mean that essential, urgent coastal protection works are delayed, potentially for a significant period, until the SMP has been updated, which in reality could take years. In such cases, the planning application proposal for the flood protection works would need to be justified and demonstrate that there would be no unacceptable adverse impacts further along the coastline. They would also need to be in general accordance with the development plan, SMP principles and SPD guidance. The application would be consulted on through the statutory planning application processes, including engaging with affected landowners, the Environment Agency, and Suffolk coastal authorities if necessary. This way all relevant responses can be considered before a decision is made. This process will be more expedient than reviewing the SMP.</p> <p>3. Promote “roll-back” and relocation Whilst coastal defences play an important part in responding to coastal erosion, they are sometimes impractical or unviable. This is where the second strand of NPPF paragraph 167 provides a solution for development and infrastructure that is at risk, by making provision for these to be relocated away from CCMAAs. Many coastal planning authorities adopt so-called “roll-back” policies as part of their development plans to proactively manage the hazard of coastal erosion. Indeed, Great Yarmouth Council in its Local Plan Part 2 review includes a draft policy (Policy E2 ‘Relocation from Coastal</p>		

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

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	<p>heart of the coastal adaption strategy; informed by the SMP but with this being considered in the overall balance of objectives for the coastal areas. In future, the SMP must be consulted upon publicly prior to it being published, in the same way that draft development plans are, so that those affected by the coastal defence management policies are given the opportunity to comment. We trust this representation is clear and will be considered in formulating a draft of the Coastal Adaption SPD. Please do not hesitate to contact me or my colleague should you require any clarification of the points made. We would be grateful if you could keep us informed of progress on reviewing the SPD.</p>		
<p>Michael Boon</p>	<p>I consider that it is wise for the local authorities who have coastal responsibilities to take a long holistic approach of the coastline as their boundaries on the coast will not align with the specific coastal problems within Shoreline Management compartments. It is essential for the economic well-being of the coastal communities that local authorities tried to maximise the practical needs of villages and settlements within their areas affected by coastal erosion. It is wise to have forward planning on each of the designated SMP coastal compartments as change is accelerating and measures to address this will affect the landward community. It's also necessary to have adaptability in any forward plan to cater for accelerating change caused by significant increased coastal erosion in places and longer-term problems which would be driven by climate change A properly prepared and flexible coastal adaption planning document can be a significant source of information for both residents and developers and can link into each Local Authority's development plans having regard for the Shoreline Management Plans overarching frontal role. It is essential that the Local Authorities planning roles addresses the fact of the impact of coastal change in erosion in the</p>	<p>Shoreline Management Plans make the decisions on the management of the coast and cover wide areas (based largely on self-contained sediment 'cells') and much of the information provided is beyond the powers of the SPD to take into account (which cannot create new policy or management approach to the coast). However, an understanding of the coastal processes along this part of the Norfolk and Suffolk coast, as well as the relationship between the SPD and the SMPs is set out in the draft SPD.</p>	<p>No change</p>

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	<p>context of significant flood protection change to the lands which lie within its area which might suffer in the event of frontal collapse. The Local Authorities should require evidence to support the economic case where necessary to be made to government to support protection of coastal communities threatened by erosion of the frontal defences</p> <p>2 Coastal Change is an inevitable part of a dynamic coastline. This presents a challenge in planning for the appropriate management of our coastlines. The risk of coastal flooding and vulnerability to erosion along the coast does not respect Local Planning Authority boundaries, and therefore coastal change needs to be considered across a wide geography. There are significant potential benefits to joint working across administrative and professional disciplines in addressing the issues of coastal management and planning.</p> <p>3 Links to Shoreline Management Plans (SMPs) I believe that Shoreline Management Plans ,broken into compartments in Norfolk and Suffolk with continual monitoring, are essential organisations to provide early warning on coastal change which might need remedy by defence . The type of defence needed will vary according to the landscape of the shoreline and the type of tidal attack experienced. The Shoreline Management Group needs to be able to take advantage of the latest research available and have access to coastline modelling to be able to work with the Flood Defence Authority in providing coastal defence. Contact with the University of East Anglia may be valuable in this context. Each of the compartments in the eastern and western halves of SMP's could have different needs. It is important to take a broad view of the coastline when installing any coastal defences to consider whether a length of defence would have an adverse effect on a compartment immediately downstream. This would argue for compartments being looked at not only for their own needs but for those</p>		

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	<p>adjacent to them. I comment further on some examples in an appendix to my response. 4 Proposed Content of the SPD</p> <p>1. Context: Homes, Businesses, and Communities Affected by Coastal Change A balanced policy of funded protection if it is available, consideration of moving landward sites and managed retreat in the context of increased tidal surges and climate change will need to be considered. 2. Coastal Management Measures and Policies A collection of both local and national powers may well be needed to be melded to protect the coast and to make the case for funding if a single set of powers locally does not qualify the obtaining of funds for necessary needs. 3. Development in the Coastal Change Management Area Within the Coastal Change Management Area, the current baseline of areas, likely to be subject to physical change of the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion, must be kept up-to-date along the eastern and western Shoreline Management Areas. Trends leading to vulnerability need to be monitored. Consultation after assessment would need to be made on a rolling basis between coastal Local Authorities and the Shoreline Management Organisation to come up with a joint view in all areas, after full consideration, to negotiate with the environment agency. Vulnerable areas in a time of increasing tidal surges should be identified and the best practice of managing an appropriate coastal defence when necessary needs to be explored on a cost benefit basis. 4. Roll-back and Relocation Options Roll-back and relocation involves the movement of assets currently or soon to be at risk from coastal change Significant assets such as lighthouses at Happisburgh and Orford or Martello Towers along the coast would be key targets for assessment of the movement to less vulnerable locations. Other examples might be coastal holiday cottages now too close to the</p>		

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

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	<p>after the storms of the last few winters. The complexity of a policy which ranges from hold the line to managed retreat is constantly being needed to be reviewed as tidal attack on the frontage becomes more severe and the effects of climate change become more apparent. The varying types of coastline within the area being reviewed does not respect existing administrative boundaries and this means that there needs to be cooperation between the responsible planning authorities who may have more than one type of coast within their administrative areas. This provokes the need for joint working but equally invites the local authorities to be consulted in the type of frontal defence being recommended by the flood defence authority. In the past there has been too much piecemeal defence on vulnerable sections of the coast and it is evident that a protection scheme of a particular type might be desirable for a short section of the coast but inevitably has a downstream effect on other sections of the coast which are not similarly protected. Vast quantities of sand are moved down the coast by the tide and there is a complex arrangement between the coast and the offshore banks which makes prediction of erosion and the position more difficult without the assistance of complex hydraulic models. There have been occasions in the past where sections of coastline needing protection have been addressed by flood protection structures utilised elsewhere in the country and it has been found at a later date that a particular type of scheme which suits one area of coast is not wholly efficient on another. I would cite in this respect the fishtail groynes utilised in the Happisburgh to Winterton early scheme which were of a similar type to that used in Jaywick in Essex. The two areas needing protection on the landward side are very different with the flatter coastline at Jaywick, which suffered considerably in the 1953 floods ,giving rise to the need to protect the small holiday resort</p>		

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	<p>from a sea ingress into lengthy marshes behind the coast. The coastal regime between Happisburgh and Winterton is that of low cliffs which are very subject to erosion and whereas sand can be trapped in the fishtails in the immediate locality beyond the southern extremity of the other fishtail groyne’s erosion would bite in the coastal compartment beyond. I do not believe that the Happisburgh to Winterton scheme was hydraulically modelled to any extent but was based on practical experience of the use of fishtail groins elsewhere. With the coastline between Holkham and Felixstowe now even more under frontal attack a broad hydraulic model which could be broken down into compartments would be highly desirable if one exists. It may well exist but it has the need of being updated with options, especially those arising from storm surges which now occur far more frequently than in the assessed 1 in 200 critical baselines to provide a satisfactory defence in the current circumstances and for the future. When the Rivers Authority was responsible for both land drainage and flood defence ,and many of the Board’s members had agricultural interests, it was anathema to talk of any retreat from the frontal defences or utilisation of flood overspill areas since defence itself was the main object at that time. Thus, the wide discussion of using the Haddiscoe Island marshland area above Breydon water to act as a mirror image flood overspill area for Great Yarmouth and the surrounding area was not proceeded with. The option lies on the table still. Times have changed now; tides are higher and it is more difficult to use the same criteria in developing frontal defences. Climate change has led to an evaluation of the value of land behind the coastal defences which has become the criteria for obtaining capital funds for frontal defence. Marshes at a low land level have been candidates for managed retreat which also has environmental benefits for</p>		

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	<p>birdlife and ecology. Coastal settlements on the top of low cliffs in areas such as Happisburgh, Winterton, Hemsby and Scratby with scattered dwellings close to the clifftops now struggle to meet the criteria to obtain appropriate funding for their coastal defence. There are of course wider considerations in the area. Perhaps that of Horsey where the defences of a series of low dunes are held together by marram grass. The area was over- topped in the 1953 floods with a considerable ingress of the sea across the marshes well inland. That flood surge, together with that of 1912, needs to be held in the memory in the present situation of sea-level rise and climate change. The Hundred Stream which is currently truncated behind the dune level originally reached the sea in the mediaeval past as a branch of the river Thurne. Salt ingress under the dunes in this area penetrates down the channel in the time of tidal surges and take some years to disappear from the landscape . In a period of sea-level rise and more frequent tidal surges if the dune wall was breached in this area again the sea ingress could run towards Potter Heigham. The North beach at Great Yarmouth would appear on most occasions to be stable and held together by Marram grass in the dunes but it is noted that in severe storms in the last winter the sea surge ran as far as the promenade wall again overtopping much of the beach. I was the architect of Great Yarmouth Outer Harbour scheme which was model tested both at the Hydraulic Research Station in Wallingford and also the Delft Hydraulics Laboratory in the Netherlands. Extensive studies were carried out to see what the effect would be downstream and I was satisfied at the time that Gorleston Beach would accrete. This has proved to be the case. However, at the very far end of the Gorleston promenade, where lesser sand had accumulated in the historic past this remains the case. The vulnerability of the cliffs at Hopton</p>		

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	<p>and Corton arises from a lack of offshore sandbanks to prevent direct wave attack from the East. I think it will be necessary in the future to provide some further sea defence for the Outer Harbour offshore of the entrance to the port as my original design, hydraulically tested provided for an overlapping breakwater to the North. Another solution would be to place in the future an offshore breakwater in deeper water clear of the entrance protecting the entrance itself, such as at Dover, which would both assist navigation and also act as a sea defence from storm waves from the East over the offshore banks. Within the river port of Great Yarmouth itself I often conducted joint schemes with the then flood authority which was Anglian Water. The joint schemes involved the third when the Port Authority wished to re-pile its quays with sheet steel piling. On these occasions an additional height to protect the land behind the quays was contributed to by the flood defence authority thus benefiting both organisations. In terms of local authority planning I remain concerned about the protection given to the West bank of the river within the tidal River Yare at Gorleston and Southtown. The river frontal defences are not high and the land behind the quays is generally low lying. Great Yarmouth is at risk to a local effect here in that in surge tide conditions one flood tide can be succeeded with another on top of it without a significant ebb. This can result in overtopping of the defences in Gorleston and there is a strong possibility of outflanking the frontal defences by ingress of high tides along Riverside Road putting the lower part of Gorleston at risk. This certainly needs to be addressed at Local Authority planning level in considering the interaction between adequate defence and protection of existing businesses. I noted that during the recent in Inspector’s Examination in Public of the proposal for a Third River Crossing of the River Yare in Southtown at Great</p>		

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	<p>Yarmouth the question of the constraint on tidal flows of the river resulting from the projected bridge piers built into the river bed but was raised. It was admitted by the Norfolk County Council, the schemes proposers', that the tidal flow would be reduced by 36% because of the structure within the river. This of course would add to the inability of a surge tide to pass this point and the backing up of the incoming tide would exacerbate the potential flooding in lower Gorleston over the flood defences. Further to the south areas such as that of Covehithe are historically extremely vulnerable in that the high soft cliffs are retreating rapidly inland. I suppose this would be considered an area which would not warrant investment to protect further cliff collapses on grounds of economic assessment. However, in the north of the eastern compartment the cliffs in areas such as Cromer, Sheringham, Overstrand and Trimmingham are vulnerable to water weight retained in the land at the top of the cliff which can cause unexpected collapses. Significant collapses of this type can also be seen elsewhere in the country such as at the cliffs of Burton Bradstock immediately north of West Bay in Dorset. In a period of increasing rainfall, I wonder is possible to provide some piped draining through these cliffs both to stabilise and to prevent the risk of such heavy collapses. Finally, I turned to the protection provided for the nationally important gas terminal at Bacton by sand feeding. I noted that the recommendation was made by Dutch contractors. During the development stage of planning the Outer Harbour I looked at the coastal reclamation scheme which was the brainchild of Ronald Waterman a Dutch engineer and specialist in coastal hydraulics. I arranged for him to come over to Norfolk and he gave a presentation on his scheme for reclamation in the Netherlands which had envisaged protection of the coastal zone zones stretching from Hoek</p>		

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	<p>van Holland to Scheveningen, the extension of the Port of Rotterdam in the Maasvlakte, and also near the extension to the ports of IJmuiden/Amsterdam. The alignment of the Netherlands coast is broadly north-west to south-east whereas that in Norfolk is convex. Dr Waterman was asked at the time, and this was back in the 1980's, whether a similar scheme for coastal defence could be applied in Norfolk. He made the comment of the different shapes of coastline between the Netherlands and Norfolk and cited the effect on movements of sand. The sand feeding of vast quantities of sand in front of Bacton may well provide temporary relief for the terminal but as has been recently seen the sand can be heavily mobile and has been carried south in recent storms into Sea Palling. Further investigation I feel is needed here for the long-term stability of this stretch of coastline.</p>		
<p>Norfolk Constabulary</p>	<p>I have asked NPS Group to send a reply for and on behalf of both Norfolk Constabulary and Suffolk Constabulary.</p>	<p>Comment noted.</p>	<p>No change</p>
<p>RSPB (Ian Robinson)</p>	<p>The scale of change predicted for the coast is immense. Conservation organisations have or are developing landscape-based proposals – RSPB Priority Landscape plans, Wildlife Trust Living Landscape plans. These plans look at integrating and expanding management for nature in accordance with the Lawton principle i.e. bigger, better and more connected. Integral to this land management and habitat connectivity is the need to connect people with nature and enable access to existing and ‘newly created’ countryside. Guidance must be available to developers on how best to create access without diminishing the value of the landscape i.e. creating access routes within an area, which fragment that area and discourage wildlife from making best use of the landscape.</p>	<p>The draft SPD recognises the importance of protecting and enhancing the natural environment as well as providing public access to the coast and the countryside, particularly in relation to rollback and relocation development.</p>	<p>No change</p>

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<p>Natural England (Victoria Wight)</p>	<p>Objectives, page 1. It is important that objectives are long term, sustainable and have positive outcomes for coastal communities, land and property owners, but also nature and environment. Coastal management can provide opportunities for natural capital and ecosystem services which contribute to erosion and flood risk reduction, as well as adaptation for local communities. Section 3. We recommend that this Supplementary Planning Document (SPD) is informed by the ongoing Shoreline Management Plan (SMP) review and that relevant changes are taken into account. Marine plans should also be considered and further information can be found here. Section 4, point 1. We suggest the creation and implementation of a strategic communication plan to facilitate engagement with communities vulnerable to coastal change. This could be used to raise awareness by de-mystifying coastal change and explaining coastal process. Section 4, point 3. Development in the Coastal Change Management Area. This could also be providing guidance as to appropriate development that could impact on wildlife interests, especially (but not limited to) protected sites, which are vulnerable to human disturbance, coastal erosion and other climate-change influenced impacts. This is also highlighted in the shared aims of the Statement of Common Ground in Coastal Zone Planning for the Norfolk &amp; Suffolk Coastal Authorities (Appendix 1, page 8) which states “to protect the coastal environment, including nature conservation designations and biodiversity”. Section 4, point 4. There needs to be a cultural change in how coastal adaptation is perceived, roll-back can be seen in a negative light however it is important to demonstrate how it can be a positive adaptive measure. As stated previously, coastal management can provide opportunities for natural capital and ecosystem services which contribute to erosion and flood risk reduction, as well</p>	<p>The draft SPD recognises the importance of the natural environment to people, communities and businesses.</p> <p>The draft SPD provides guidance concerning the relationship between the SMP, Local Plan policies, Marine Plans, national policy and various other policy and guidance documents.</p> <p>The draft SPD focusses primarily on coastal change resulting from erosion of the coast rather than flood risk. However, flood risk is of course a significant issue in many coastal locations.</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>as adaptation for local communities. Opportunities should be sought to explore habitat enhancement and creation through coastal adaptation, to make space for nature and to provide room for the coast to function, so that ‘if we help it, it will help us’. Coastal flooding and erosion management could also be used to aid nature recovery and this is something that Natural England are keen to explore with Coast Partnership East and would welcome a conversation over the coming months. Section 5. The SPD, in conjunction with the relevant SMP’s may be able to provide a strong steer and presumption against any development that increases flood and erosion risk to people, and in turn put pressure on wildlife sites and coastal processes.</p>		
<p>North Norfolk District Council (Planning Policy Team)</p>	<p>Thank you for the opportunity to comment on the initial consultation documentation associated with the production of a joint Coastal Adaptation SPD. Please find our below an Officer level response.</p> <p>The emerging North Norfolk Local Plan has two coastal policies, SD11: Coastal Erosion and Policy SD 12: Coastal Adaptation, which are currently being finalised ahead of Regulation 19. As a Coast Protection Authority, involved in the creation of the SPD, we wish to offer our full support in providing a joint document that will support and inform our emerging coastal policies.</p> <p>For NNDC, it is particularly important that the joint SPD should usefully address:</p> <ul style="list-style-type: none"> <li>- clearly set out the national and strategic frameworks and the Local Plan Policies that influence coastal change along the coastline, as well as informing which and how different organisations are involved and how their roles and responsibilities interconnect;</li> </ul>	<p>Support noted. The draft SPD provides a policy context section that sets out the various national and local policy and guidance documents relevant to coastal adaptation, ranging from Local Plan policies to marine planning and SMPs. This chapter is supported by an appendix that sets out the roles and responsibilities of organisations acting on the coast.</p> <p>The draft SPD is supported by a glossary which provides definitions for key terms, and the draft SPD has also be written in plain English to ensure it is accessible to as many people as possible.</p> <p>The circumstances when temporary development would be appropriate within the CCMA and requirements relating to the preparation of a Coastal Erosion Vulnerability Assessment are set out in the draft SPD.</p> <p>The draft SPD also contains guidance relating to the implementation of rollback and relocation policies,</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
	<ul style="list-style-type: none"> <li>- give full explanations of the coastal terms used, for example, coastal erosion, coastal adaptation;</li> <li>- explain what types of temporary development would be appropriate within the 50 year and 100 year epochs of the areas designated as Coastal Change Management Areas;</li> <li>- inform what is the required content for a Coastal Erosion Vulnerability Assessment, giving proportionate examples/ template;</li> <li>- give further guidance on the protection and replacement of coastal infrastructure; (such as roads )</li> <li>- provide case studies for each area covered from our collective authorities, such as the innovative landscaping scheme at Bacton, but also use examples from further afield, both nationally and internationally;</li> <li>- as part of the roll back/ relocation options, set out the likely requirements with regard to mitigation and how planning conditions and legal agreements should be used to ensure biodiversity/ environmental net gain.</li> </ul>	<p>and is supported by a number of coastal adaptation best practice case studies.</p>	
<p>Holkham Estate (Peter Mitchell)</p>	<p>I support the approach and have no suggestions to make which would improve it. My concern is that, going forward, Holkham Estate is included in subsequent stages of this project – in the development of the full SPD draft and in particular the criteria around enabling developments. It is a concern that studies needed to firm up the Conditional Policies in SMP5 remain outstanding as these are key to the long-term planning that is so important to owners of low-lying land on the coast.</p>	<p>Whilst the SPD cannot alter SMP policy, developing workable guidance on enabling development forms part of the draft SPD.</p>	<p>No change</p>

## Appendix 4: Draft consultation promotion material

### Social media – Facebook and Twitter

Examples provided by East Suffolk Council:

#### Consultation start 25<sup>th</sup> January 2023

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Have your say on a new planning document which provides guidance for communities which may be affected by coastal change.

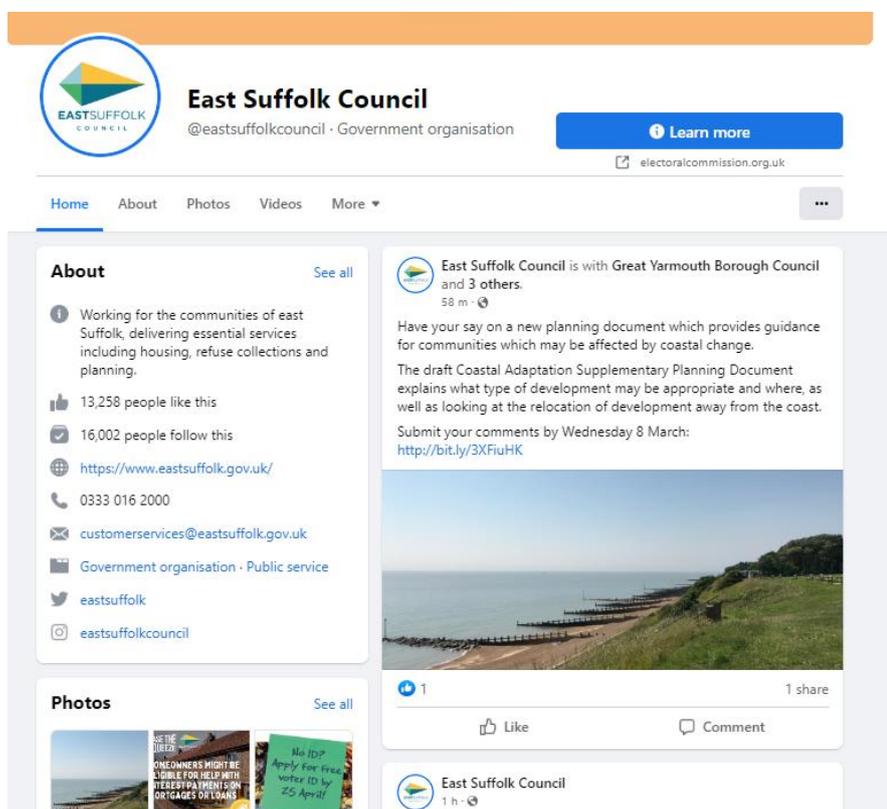
The document explains what type of development may be appropriate and where.

Submit your comments by Wednesday 8 March:  
[bit.ly/3XFiuHK](http://bit.ly/3XFiuHK)



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East Suffolk Council is with Great Yarmouth Borough Council and 3 others. 58 m ·

Have your say on a new planning document which provides guidance for communities which may be affected by coastal change. The draft Coastal Adaptation Supplementary Planning Document explains what type of development may be appropriate and where, as well as looking at the relocation of development away from the coast. Submit your comments by Wednesday 8 March: <http://bit.ly/3XFiuHK>

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## Two weeks to end of consultation 22<sup>nd</sup> February 2023

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Submit your comments by Wednesday 8 March:  
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Have your say on a new planning document which provides guidance for communities which may be affected by coastal change.

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## Press release – joint press release by the Partnership authorities.



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### Have your say on new planning document

Posted by on 23 January 2023 | Comments

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

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

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

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

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

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

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

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

#### **This consultation is now closed.**

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

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

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



Poster



# Have your say

## Draft Coastal Adaptation Supplementary Planning Document

Consultation period  
Wednesday 25<sup>th</sup> January to 5pm Wednesday 8<sup>th</sup> March 2023

### What are we doing?

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

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



### How can you get involved?

#### GIVE YOUR VIEWS

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

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



Find out more and give your views:

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

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

[planningpolicy@eastsuffolk.gov.uk](mailto:planningpolicy@eastsuffolk.gov.uk)  
 01394 444557 / 01502 523029

## Appendix 5: Draft consultation responses

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

### Chapter 1 Introduction

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made												
Paragraphs 1.1 - 1.4	Bourne Leisure (Lichfields)	163	<p>Summary</p> <p>Overall, it is considered that the draft SPD has taken a pragmatic approach to balancing the needs of supporting coastal development and the local economy, whilst ensuring adequate provisions are in place to respond to coastal change. We therefore hope the key elements of the draft SPD commented on above will be retained in the next version of the document.</p>	Comment noted	No change												
Paragraphs 1.1 - 1.4	British Pipeline Agency Ltd (Lands Department)	37	<p>Dear Sir/Madam</p> <p><b>Bacton to North Walsham Pipelines - Affected Consultation</b></p> <table border="1"> <tr> <td>Our Ref</td> <td>2023-6527</td> </tr> <tr> <td>Your Ref</td> <td></td> </tr> <tr> <td>Linesearch Ref</td> <td></td> </tr> <tr> <td>Location</td> <td>633196, 334708 Holkham in Norfolk to Felixstowe in Suffolk Norfolk and Suffolk</td> </tr> <tr> <td>Work Description</td> <td>Development in coastal locations, relocation of development away from coastal locations, and enabling development. BPA only affected in the area of Paston - Bacton to North Walsham Pipeline.</td> </tr> <tr> <td>Technician Area</td> <td>BAC-NWA</td> </tr> </table> <p>Thank you for your enquiry regarding the Draft Coastal Adaptation.</p>	Our Ref	2023-6527	Your Ref		Linesearch Ref		Location	633196, 334708 Holkham in Norfolk to Felixstowe in Suffolk Norfolk and Suffolk	Work Description	Development in coastal locations, relocation of development away from coastal locations, and enabling development. BPA only affected in the area of Paston - Bacton to North Walsham Pipeline.	Technician Area	BAC-NWA	Comment noted	No change
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Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>This consultation affects the pipeline system operated by BPA ( Bacton to North Walsham Pipeline) in the area of Paston only. Please find attached our GIS map. Before any work (including hand trial holes) starts on site you must consult with BPA. Email <a href="mailto:landsteam@bpa.co.uk">landsteam@bpa.co.uk</a> to arrange a free site meeting with one of our Technicians.</p> <p>Your safety is paramount to BPA. In order to protect you from potential injury or death we ask that this safety information is passed to the person that will be carrying out the work.</p> <p>BPA regularly monitor the pipelines and we ask that the following procedures are observed:</p> <ul style="list-style-type: none"> <li>• Before any work (including hand trial holes) starts in the vicinity, a BPA Technician must locate and mark the pipeline(s) on site.</li> <li>• All works within 6m of the pipeline require prior approval by BPA and a BPA Technician must supervise all works within 6m of the pipeline(s). The technician will determine whether a written method statement is necessary before any works proceed.</li> <li>• BPA require a minimum of 7 days’ notice to arrange supervision (under normal circumstances).</li> <li>• Heavy vehicle crossing points to be approved before use across the easement.</li> <li>• Any works involving the exposure of the pipeline/s requires a continuous site presence until backfilled (this may mean a security arrangement out of hours).</li> <li>• BPA may require proof of liability insurance depending on the proposed works.</li> <li>• Utility crossings may require a formal crossing consent</li> </ul>		

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

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

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

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

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

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>place so that parishioners can understand implications better</p> <ol style="list-style-type: none"> <li>2. Parishioners are generally critical of all the investment in studies, reports etc over a period of decades, with very little in the form of activity</li> <li>3. Parishioners are concerned by the quantity of masonry on the beach and are keen to see properties removed before they create debris on the beach</li> <li>4. Many parishioners are keen to see the car park rolled back away from the beach as soon as possible before erosion also removes the current car park</li> <li>5. Parishioners note that no additional properties should be built on the seaward side of the main road</li> <li>6. Parishioners are concerned for the distress and anxiety involved in the loss of parishioners' homes and the concern that they will not receive compensation.</li> <li>7. There is a lack of clarity to parishioners as to how much compensation could be received.</li> <li>8. There is a general lack of understanding regarding CTAP</li> <li>9. Parishioners note that the houses built to replace the Beach Road houses that were demolished are not 'replacement's' as they were expensive and many have been sold as holiday homes</li> <li>10. Some parishioners have noted concerns with the erosion of the cliffs at the old caravan park in Happisburgh, where there are still buildings remaining</li> <li>11. Fundamentally, many parishioners have written to say that they do not understand the document</li> <li>12. A parishioner has pointed out to the Parish Council that if the sea breaks through the cliffs at Doggett's Lane in Happisburgh, it will flood the Norfolk Broads</li> <li>13. A parishioner points out the economy and hidden economy within the village, taking into account the</li> </ol>	<p>scope of the SPD to consider/address, but it is agreed (point 3) that properties should be demolished before they collapse. There is no compensation for loss of properties to erosion (point 7), as stated in paragraph 5.6.</p> <p>Further information on the CTAP project will be published publicly over the coming months.</p>	

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>income made by holidays homes &amp; Airbnb’s, the caravan park, the jobs associated with them, the cleaners, gardeners &amp; handymen this adds up to a large source of money within the local economy, then on top of this the visitors who rent these and visit the village spend money via the shops &amp; pub and artisan crafters who sell via studios from their homes. All this contribution to the economy would be lost if Happisburgh is lost to the sea</p>		
<p>Paragraphs 1.1 - 1.4</p>	<p>Historic England (Marsh, Andrew)</p>	<p>152</p>	<p>Thank you for consulting Historic England on the Councils’ Draft Coastal Adaptation Supplementary Planning Document. As the government’s adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account when preparing strategies and plans, given that heritage assets are an irreplaceable resource.</p> <p>While we have no specific comments to make, we welcome the preparation of this SPD (including it’s numerous references to the historic environment), and will be interested in receiving subsequent consultations on this and related documents.</p> <p><b>CONCLUSION</b></p> <p>Finally, we should like to stress that this response is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise as a result of this plan, where we consider that these would have an adverse effect upon the historic environment. If you have any questions with regards to the comments made, then please do get back to me. In the</p>	<p>Comment noted</p>	<p>No change</p>

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Chapter 3 Coastal Management Measures and Policies**

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

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

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

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

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

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

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

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

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

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

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

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

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

**Chapter 4** Development in the Coastal Change Management Area

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Chapter 5 Rollback and Relocation**

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

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

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

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

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

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

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

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

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

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

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
	(Georgia Teague)		<p>‘reduce the potential for isolated dwellings in the countryside’ as detailed within paragraph 5.10.</p> <p>SCC also support paragraph 5.14, recognising the “preference for all sites to be able to access the nearest settlements and facilities safely and where possible via non-motorised travel modes”.</p> <p>SCC would suggest including specific provisions for the needs of residents who are most vulnerable and within the short-and medium-term erosion risk areas. This could include those who are elderly, disabled, and/or living with neurodiversity: For example, the SPD could, in relation to areas or land intended for enabling sites for rollback or relocation, specify the need to ensure developments create elderly, frailty, blind/poor sight, neurodiversity and dementia-friendly neighbourhoods that consider aspects such as: wheelchair/reduced mobility accessibility and distinctive signage for neurodiversity and dementia with inclusive community design e.g.;equality of access for all disabilities including deaf and blind.</p> <p>Paragraph 5.13 refers to occupiers of the rollback accessing facilities in their new location. It is suggested that the paragraph is extended to accommodate those with additional needs:</p> <p>“In simple terms this means that in interpreting the policy, the applicant will need to clearly demonstrate that the occupiers of the rollback or relocated dwelling will not be disadvantaged with respect to accessing facilities (e.g, primary school, food shop, bus services, employment opportunities etc) than the location the original dwellings was in; and where possible, demonstrate an improved level of access to such facilities. This</p>	<p>Comment noted and welcomed.</p> <p>The comments on the need to plan appropriately particular categories of residents (elderly, disabled etc) are noted. However, there are other relevant Local Plan policies (for example, Policy WLP8.31 (Lifetime Design) in the Waveney Local Plan) and the NPPF which cover this territory and so it is outside the scope of the SPD.</p>	

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

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

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

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

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

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

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

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

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

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

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

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

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

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			inland freshwater habitats, improved resilience to climate change, carbon sequestration, and increased ecotourism. Saltmarsh habitat has also been shown to reduce wave height and energy therefore reducing future erosion on coastal defences ( <a href="https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/101212/natural_flood_management_evidence.pdf">The evidence behind Natural Flood Management. Environment Agency. (publishing.service.gov.uk)</a> )		
Paragraphs 5.34 - 5.40	Aldringham-cum-Thorpe Parish Council (Eric Atkinson)	145	5.40 - Does the existing site once cleared remain in private ownership and if so how can the beneficial use or appropriate adaption be enabled?	It would depend on the precise ownership situation (sometimes property may be owned leasehold, sometimes freehold). But in certain circumstances the relevant council (or perhaps other public body or quasi-public body) might agree to acquire the site/plot/house and put it to alternative use.	Sentence added to para 5.43: "Sites might be able to be transferred to the relevant local authority or parish council, but this would be dependent on private negotiations (on matters like costs and liabilities)."
Paragraphs 5.34 - 5.40	Anne Jones	65	It is totally unfair that landowners are expected to bear the cost of clearing a site - in what way does this help communities to prosper and adapt?	Requiring clearance of land where there is a potential for e.g. pollution if a house was to be lost to coastal erosion is a reasonable position for authorities to take, although it is of course acknowledged that there can be a cost associated with it.	No change
Paragraphs 5.34 - 5.40	National Trust (Sandra Green)	123	Para 5.34 - Removal of below ground structures needs to be weighed against contamination risk - all services etc. do need to be made safe even if they are not physically removed.  Para 5.40 2nd sentence - it is good to see some mention of this in the document.	This is correct and some words of clarity about shutting off services will be added	New paragraph 5.37 amended: "...if structures are not considered practicable, at least they should be made safe/de-connected (or similar)."

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

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

**Chapter 6 ‘Enabling’ Development**

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

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

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

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

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

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

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

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

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

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

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

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

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

**Appendix 2 Organisation Roles and Responsibilities**

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

**Appendix 3 Coastal Erosion Vulnerability Assessment (CEVA) Template**

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

**Appendix 4 Case Studies**

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

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

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

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

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

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

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

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

**Appendix 5 Example Conditions**

No responses received

**Appendix 6 Neighbourhood Plan Guidance**

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

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

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

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# Strategic Environmental Assessment Screening Opinion

## Coastal Adaptation Supplementary Planning Document

October 2022



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## 1. Introduction

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

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

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

## 2. Legislative Background

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

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

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

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

The preparation of the SPD triggers a requirement to determine whether it is likely to have a significant environmental effect. This requirement is discharged by the 'responsible authority' being the authority by which or on whose behalf the plan is prepared<sup>1</sup>. Before making a determination, the responsible authority shall: -

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

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

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

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

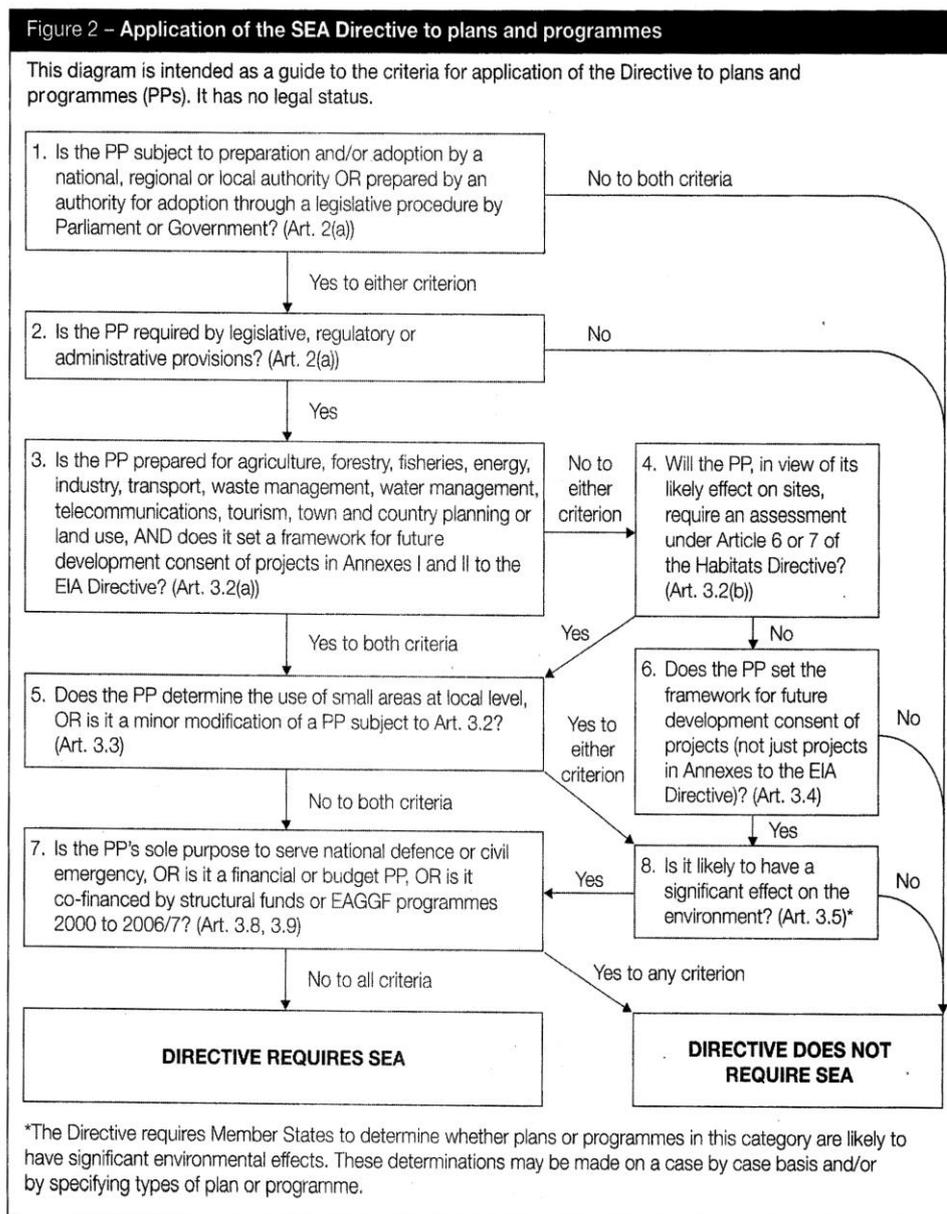
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<sup>1</sup> The responsible authorities in this case are: East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, and The Broads Authority.

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

## 4. Assessment

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

No. Not applicable.

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

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

## 5. Conclusion

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

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

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

Signed:

Dated: 26 October 2022



Iain Withington  
Planning Policy Team Leader  
North Norfolk District Council

Signed:

Dated: 21 October 2022



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

Signed:

Dated: 31 October 2022



Marie-Pierre Tighe  
Director of Strategic Services  
The Broads Authority

Signed:

Dated: 31 October 2022



Kim Balls  
Principal Strategic Planner  
Great Yarmouth Borough Council

## Appendix 1: Responses from Statutory Consultees

### Environment Agency Response

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

Good afternoon,

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

Kind regards,

Natalie Kermath

## Historic England Response

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

Dear Laura,

RE: SEA Screening Coastal Adaptation Supplementary Planning Document

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

Best wishes,

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

Direct line: [REDACTED]

Historic England

Brooklands | 24 Brooklands Avenue | Cambridge | CB2 8BU

[www.historicengland.org.uk](http://www.historicengland.org.uk)

## Natural England Response

Date: 14 October 2022  
Our ref: 405837



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

████████████████████  
████████████████████  
**BY EMAIL ONLY**

Dear Laura Mundy

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

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

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

#### **Summary of response:**

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

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

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

## Comments

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

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

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

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

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

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

Should the proposal change, please consult us again.

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

Yours sincerely

Daniel Turner  
Norfolk and Suffolk Team

# Habitats Regulations Assessment Screening Statement

## Coastal Adaptation Supplementary Planning Document

October 2022



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## 1. Introduction

- 1.1 The Conservation of Habitats and Species Regulations (2017) (as amended) provide protection for sites that are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species. The network consists of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both types can also be referred to as European Sites. The National Planning Policy Framework (NPPF) states that Ramsar sites should be afforded the same level of protection and refers to SACs, SPAs and Ramsar sites as ‘Habitat Sites’.
- 1.2 The requirement to undertake Habitats Regulation Assessment (HRA) of plans and projects is set out in the Conservation of Habitats and Species Regulations (2017) (as amended).
- 1.3 Regulation 105 of the Conservation of Habitats and Species Regulations (2017) states:
- ‘Where a land use plan:
- (a) Is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and
  - (b) Is not directly connected with or necessary to the management of the site, The plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site’s conservation objectives.’
- 1.4 The HRA is therefore undertaken in stages and should conclude whether or not a proposal or policy would adversely affect the integrity of any sites.

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

principle. The screening assessment must reflect the outcomes of the 2018 judgement of the Court of Justice of the European Union<sup>1</sup>, which has ruled that where mitigation is necessary this must be identified through an Appropriate Assessment.

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

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

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

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

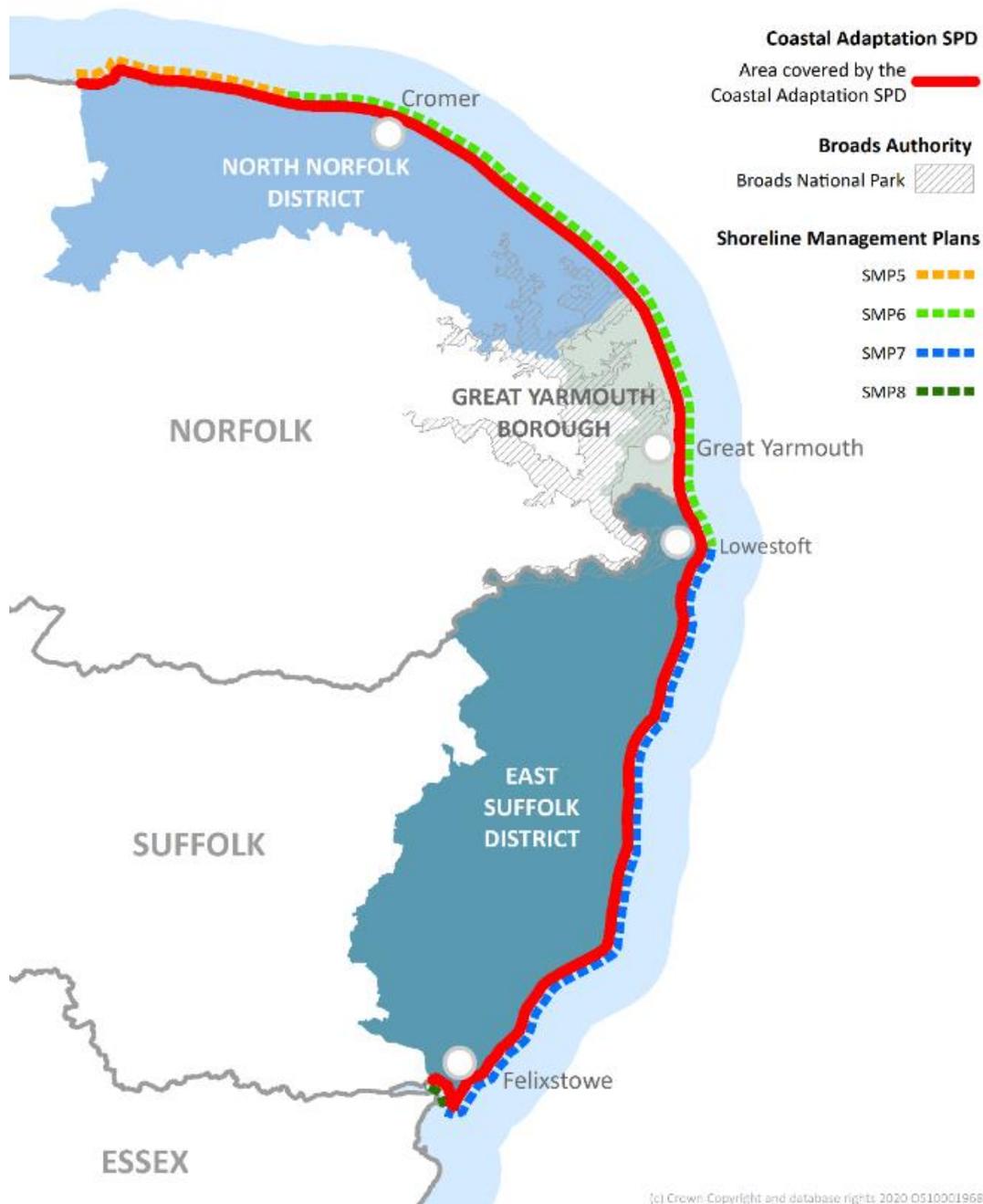


Figure 1: Extent of Coastal Adaptation Partnership Area

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

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

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

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

## 2. Protected sites covered by this report

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

**Table 1: Relevant Habitat sites**

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

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

### 3. Coastal Adaptation Supplementary Planning Document

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

## 4. Other Plans and Projects

4.1 Regulation 105 of the Habitats Regulations requires consideration to be given to whether a Plan will have an effect either alone or in combination with other plans or projects.

4.2 As noted in the introduction, the other key plans are the Local Plans. The Local Plans set out the broad scale and distribution of development across the four authorities which make up the SPD Partnership Area.

4.3 Specifically, the SPD adds detail to the following policies contained within the Local Plans:

- East Suffolk Council- policies SCLP9.3 (Coastal Change Management Area) and SCLP9.4 (Coastal Change Rollback or Relocation) of the Suffolk Coastal Local Plan and policies WLP8.25 (Coastal Change Management Area), WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion) of the Waveney Local Plan.
- Great Yarmouth Borough Council- Local Plan Part 1 policy CS13 (Protecting Areas at Risk of Flooding or Coastal Change), Local Plan Part 2 policy GSP4 (New Development in Coastal Change Management Areas), Local Plan Part 2 policy E2 (Relocation from Coastal Change Management Areas).
- North Norfolk District Council- Core Strategy policy EN11 (Coastal Erosion), policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk), emerging Local Plan policy CC5 (Coastal Change Management), and emerging Local Plan policy CC6 (Coastal Change Adaptation).
- The Broads Authority- Broads Local Plan policy SSCOAST (The Coast).

4.4 Screening has been carried out on all the relevant local plans across the partnership area and concluded whether significant effects were likely and if Appropriate Assessment was therefore needed. Where screening identified a likely significant effect, Appropriate Assessment was undertaken and the mitigation measures identified were incorporated within the Plans, resulting in conclusions that the plans will not lead to any adverse effects on Habitat sites.

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

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

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

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

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

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
Chapter 4: Development in the Coastal Change Management Area	<p>This chapter provides detailed guidance regarding the types of development that may be appropriate within identified Coastal Change Management Areas (CCMAs) and set out the planning considerations for development within the CCMAs.</p> <p>The guidance in this chapter builds on the relevant local plan policies, namely:  <b>East Suffolk Council:</b> SCLP9.3 Coastal Change Management Area and WLP8.25 Coastal Change Management Areas.  <b>Great Yarmouth Borough Council:</b> GSP4 New Development in Coastal Change Management Areas.  <b>North Norfolk District Council:</b> EN11 Coastal Erosion.  <b>The Broads Authority:</b> SSCOAST The Coast</p> <p>The above policies have been subject to separate HRA as part of the their production and any necessary mitigation incorporated into the relevant Local Plans.</p> <p>The guidance in this chapter supports the Government’s objective to ensure that development will only be appropriate in a CCMA if it requires a coastal location and provides substantial economic and social benefits to communities. The guidance is clear that new permanent residential will not be</p>	None	None	No

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	<p>permitted in CCMA's and that new non-residential development that is not associated with an existing building or use, is unlikely to be appropriate within the CCMA, whatever its proposed use.</p> <p>This chapter also provides specific guidance on use Coastal Erosion Vulnerability Assessment (CEVA).</p> <p>This chapter provides guidance for land and property owners and those wishing to apply for planning permission or carry out development within the CCMA. The guidance expands on existing policy and clarifies the approach to the consideration of development within the CCMA's; it does not, in itself promote additional development. This chapter will therefore not lead to likely significant effects on Habitat Sites alone or in combination with other plans or projects.</p>			
Chapter 5: Rollback and Relocation	This chapter explains the requirement for LPAs to make provision for development & infrastructure that needs to be relocated away from CCMA's and links to the relevant guidance in the NPPF and NPPG. This chapter also provides an explanation on what is meant by 'rollback' and 'relocation' and explains that compensation is not included as part of this and	None	None	No

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	<p>is beyond the remit of the SPD. The chapter provides guidance on both residential and commercial, business and leisure uses.</p> <p>The guidance in this chapter builds on the relevant local plan policies, namely:</p> <p><b>East Suffolk Council:</b> Policy SCLP9.4 (Coastal Change Rollback or Relocation) and Policy WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion).</p> <p><b>Great Yarmouth Borough Council:</b> Policy E2 (Relocation from Coastal Change Management Areas).</p> <p><b>North Norfolk District Council</b> Policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk)</p> <p>This chapter provides further detail guidance on the interpretation of the relevant local plan policies particularly around issues such as how land or sites may be identified for rollback or relocation purposes; how such land may be acquired or identified; and how land, which has been vacated from, should be managed or utilised in the future to the point at which it eventually becomes lost to the sea. The guidance in this chapter does not, in itself promote additional development and will therefore not lead to likely significant effects on Habitat Sites alone or in combination with other plans or projects.</p>			

<b>Chapter</b>	<b>Assessment of potential impact on Habitat sites</b>	<b>Habitat sites that could possibly be affected</b>	<b>Likely significant effect identified</b>	<b>AA needed?</b>
<p>Chapter 6: Delivery and Enabling Development</p>	<p>This chapter provides guidance on the circumstances whereby enabling development may be considered necessary to help support coastal adaptation/rollback measures. Example scenarios are provided.</p> <p>This chapter includes reference to opportunities for the rollback or creation of natural habitats through development elsewhere.</p> <p>This chapter provides further detail guidance on the interpretation of the relevant local plan policies and does not, in itself, promote additional development and will therefore not lead to likely significant effects on Habitat Sites alone or in combination with other plans or projects.</p>	<p>None</p>	<p>None</p>	<p>No</p>

## 6. Summary and conclusions

- 6.1 The Coastal Adaptation Supplementary Planning Document (SPD) provides additional guidance to inform the determination of planning applications across the SPD Partnership Area (East Suffolk, Great Yarmouth, North Norfolk and The Broads Authority Area). The SPD provides information and advice for residents, businesses and other relevant organisations concerning coastal management measures and policies, development in the Coastal Change Management Area (CCMA); rollback and relocation; and delivery and enabling Development.
- 6.2 The guidance contained in the SPD will assist in the implementation of Local Plans and Neighbourhood Plans across the SPD Partnership Area (East Suffolk, Great Yarmouth, North Norfolk and The Broads Authority Area). The SPD, when adopted, will be a material consideration in the determining of applications for planning permission.
- 6.3 Following screening for likely significant effects it is concluded that implementation of the SPD will not lead to likely significant effects on protected Habitat sites alone or in combination with other plans or projects.
- 6.4 Natural England were consulted on a draft of this Screening Statement as statutory nature conservation body and they agreed with the conclusions set out above. Their response can be found in Appendix 4.

Signed:

Dated: 26 October 2022



Iain Withington  
Planning Policy Team Leader  
North Norfolk District Council

Signed:



Dated: 21 October 2022

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

Signed:

Dated: 31 October 2022



Marie-Pierre Tighe  
Director of Strategic Services  
The Broads Authority

Signed:

Dated: 31 October 2022



Kim Balls  
Principal Strategic Planner  
Great Yarmouth Borough Council

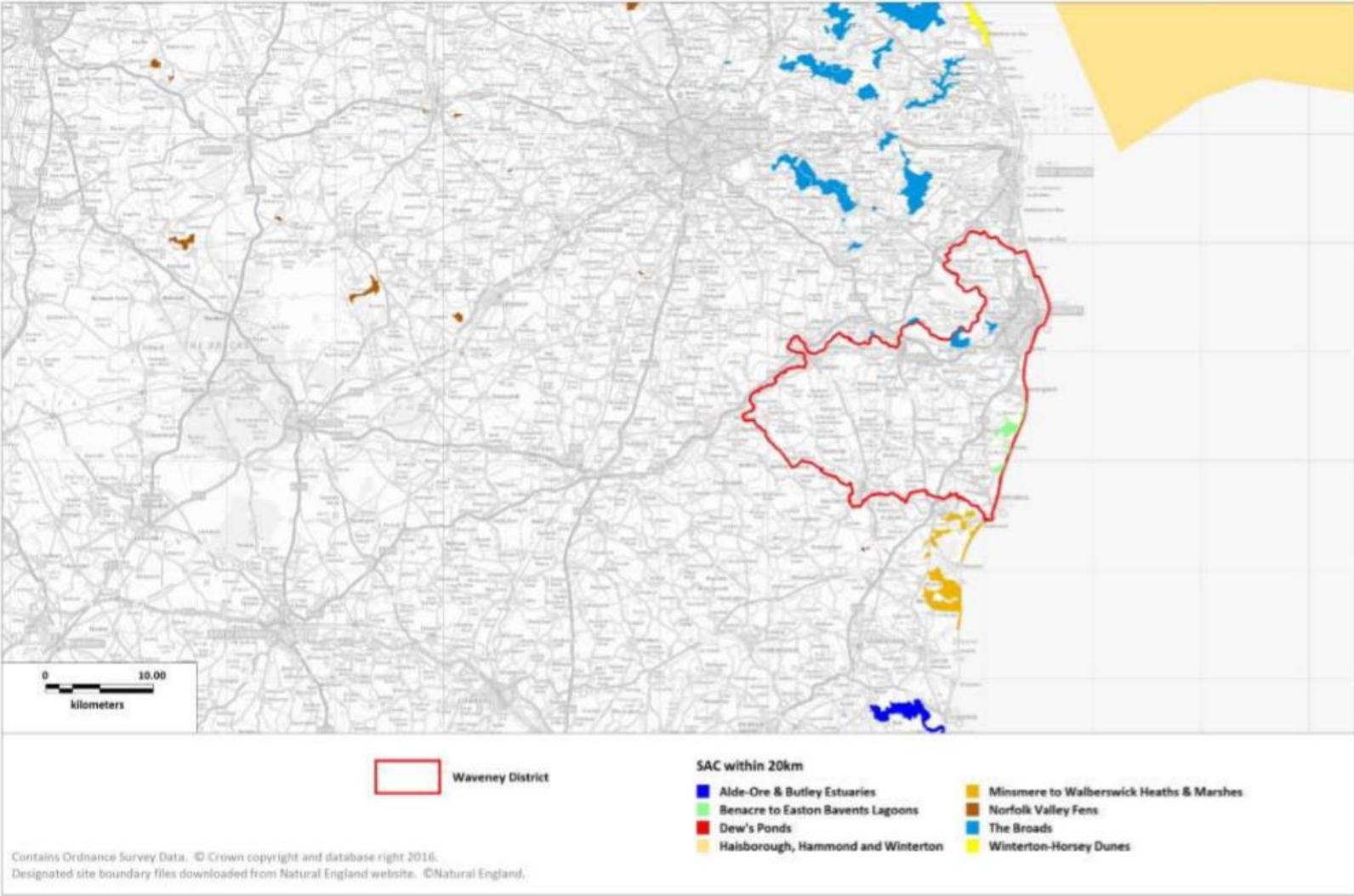
## Appendix 1: Sources of background information

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

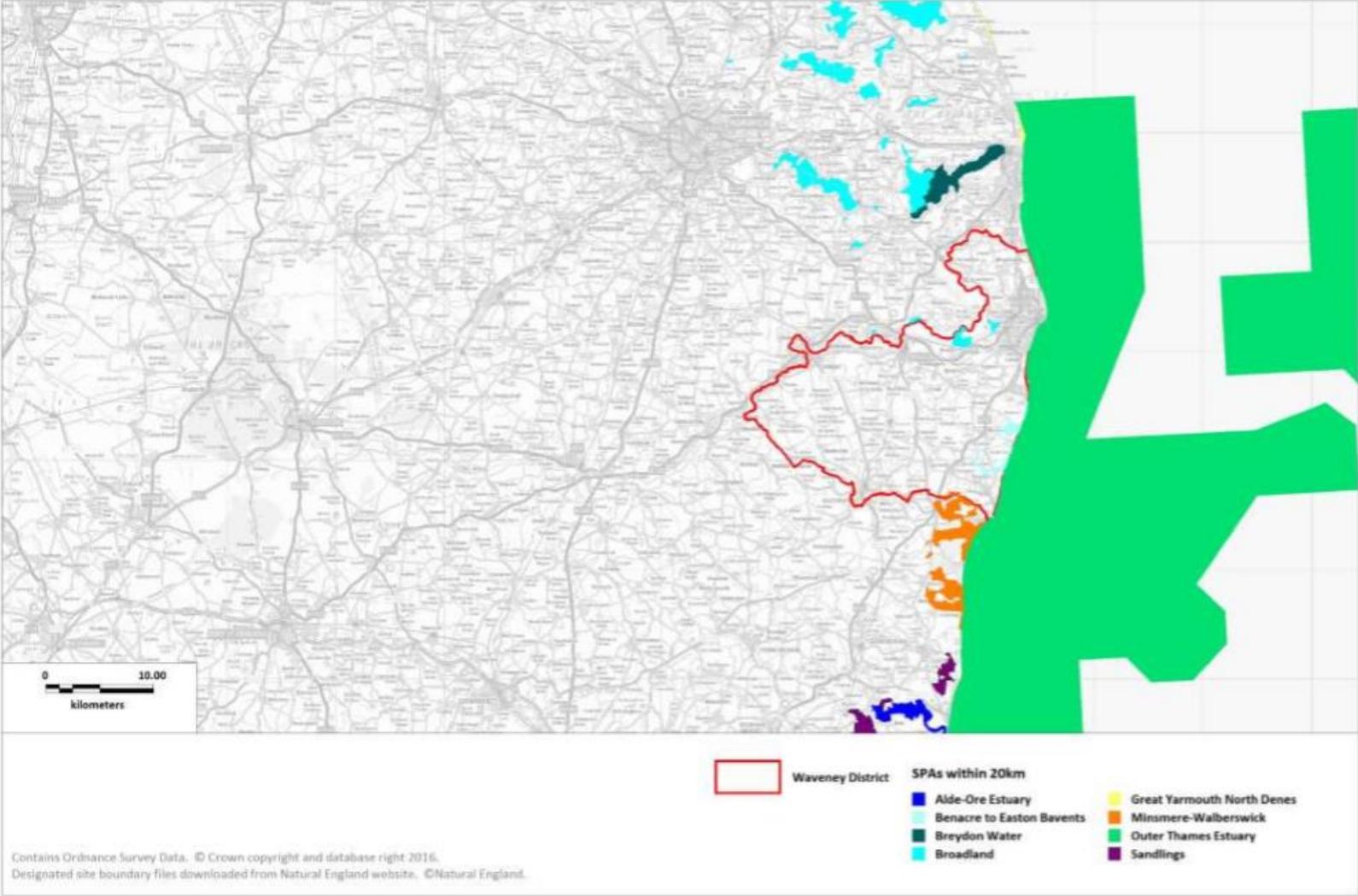
## Appendix 2: Locations of Habitat sites

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

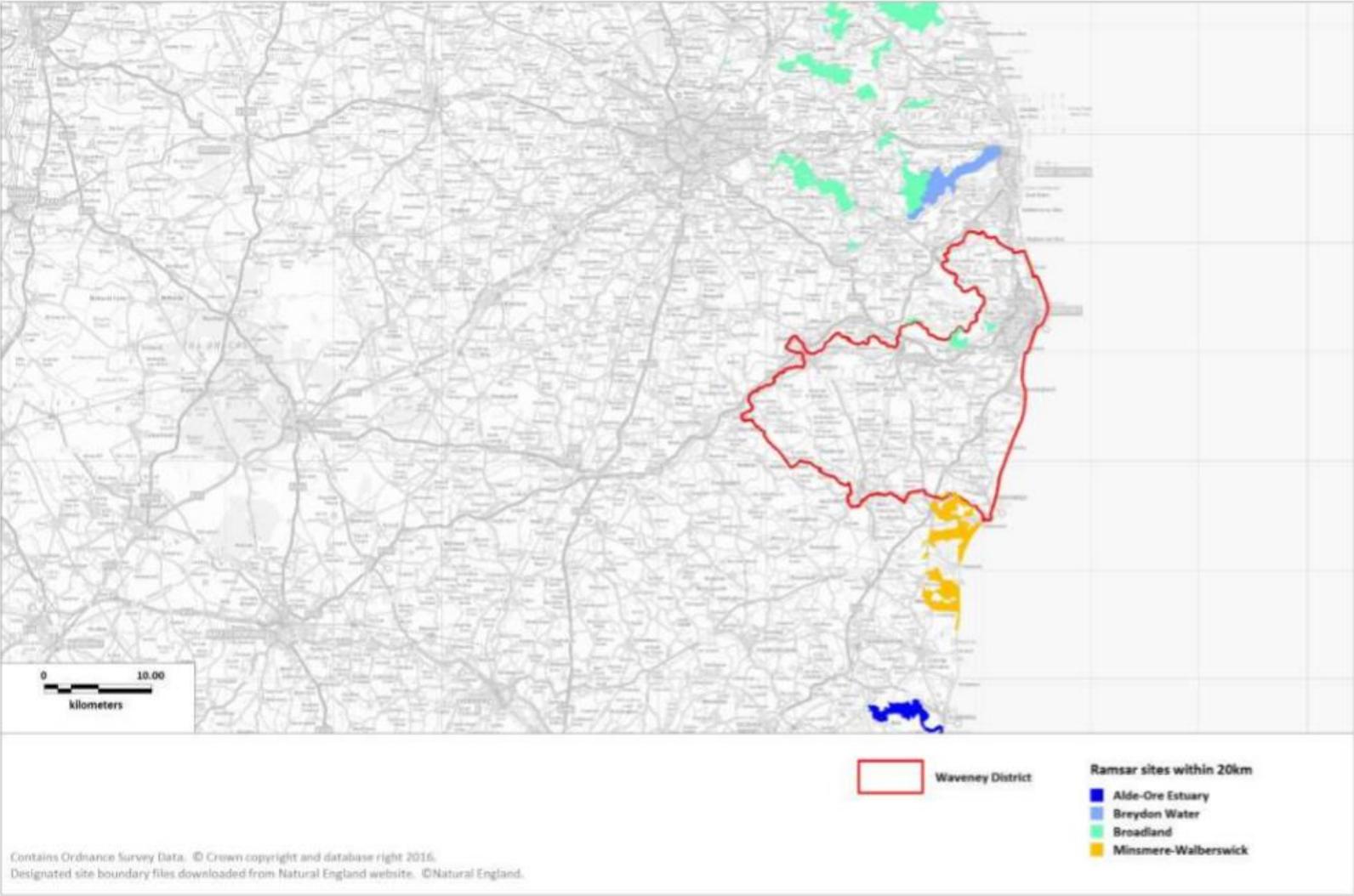
Map 1: SACs



Map 2: SPAs

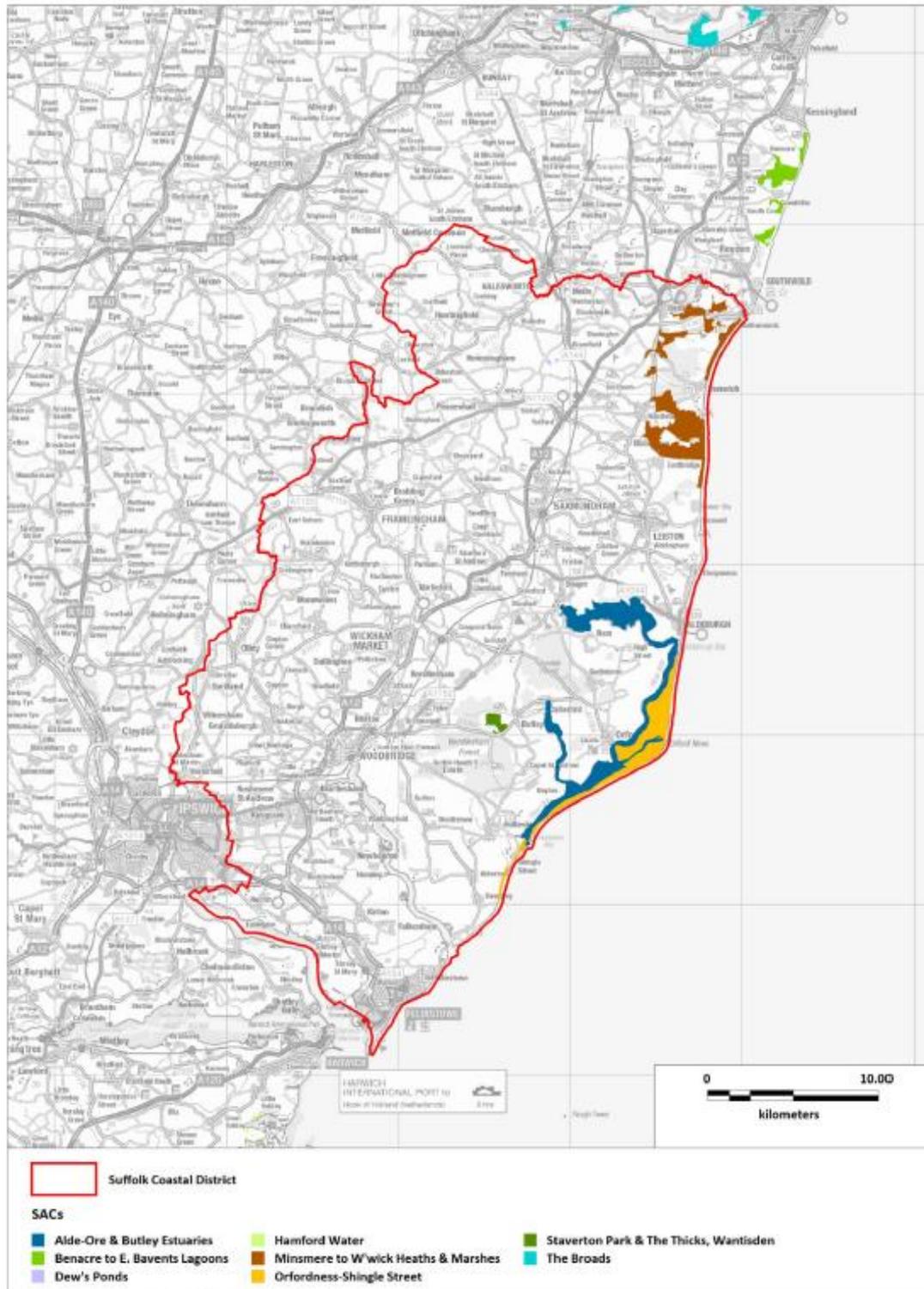


Map 3: Ramsar Sites



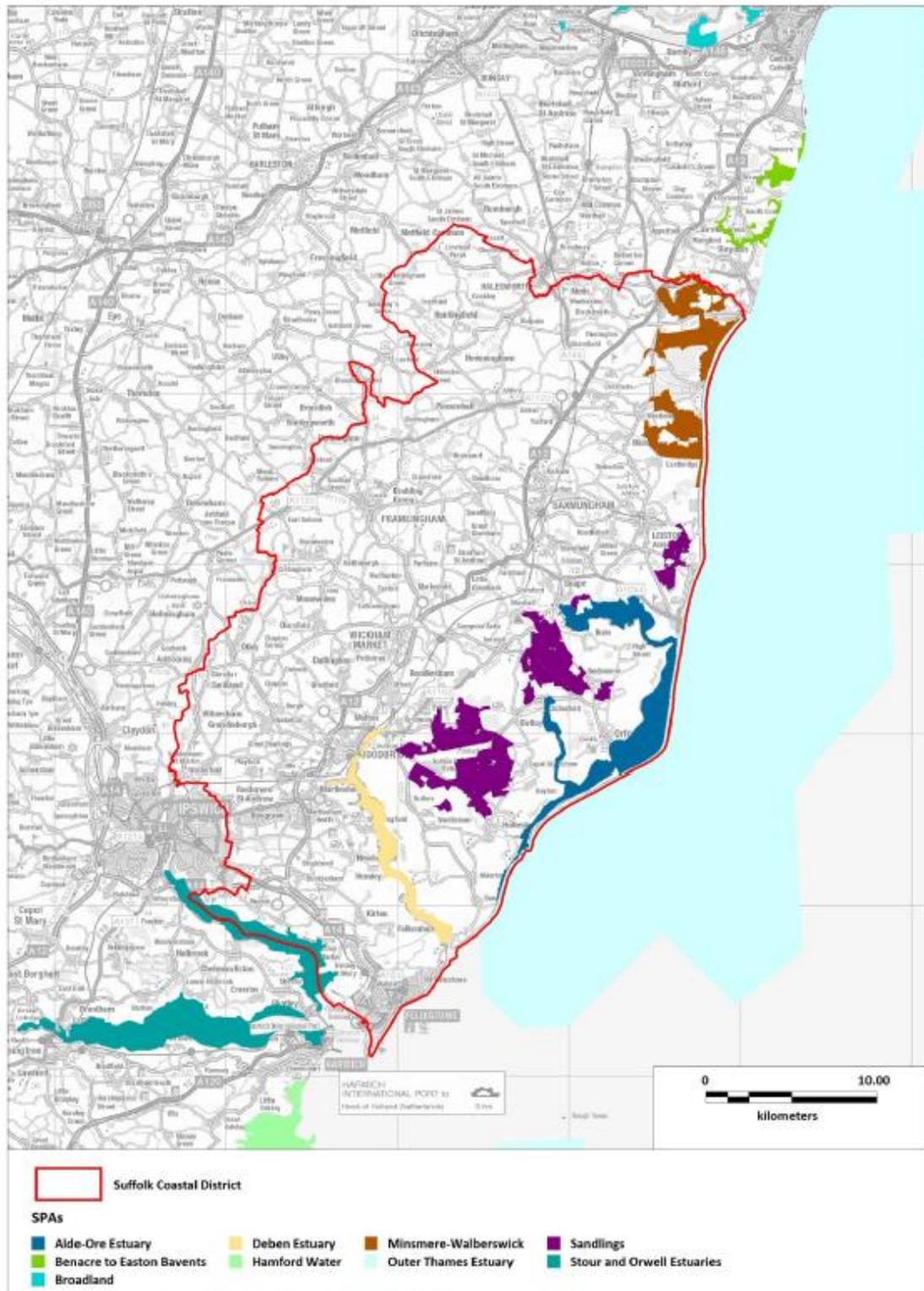
## Habitat sites within 20km of the East Suffolk Council- Suffolk Coastal Local Plan Area

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



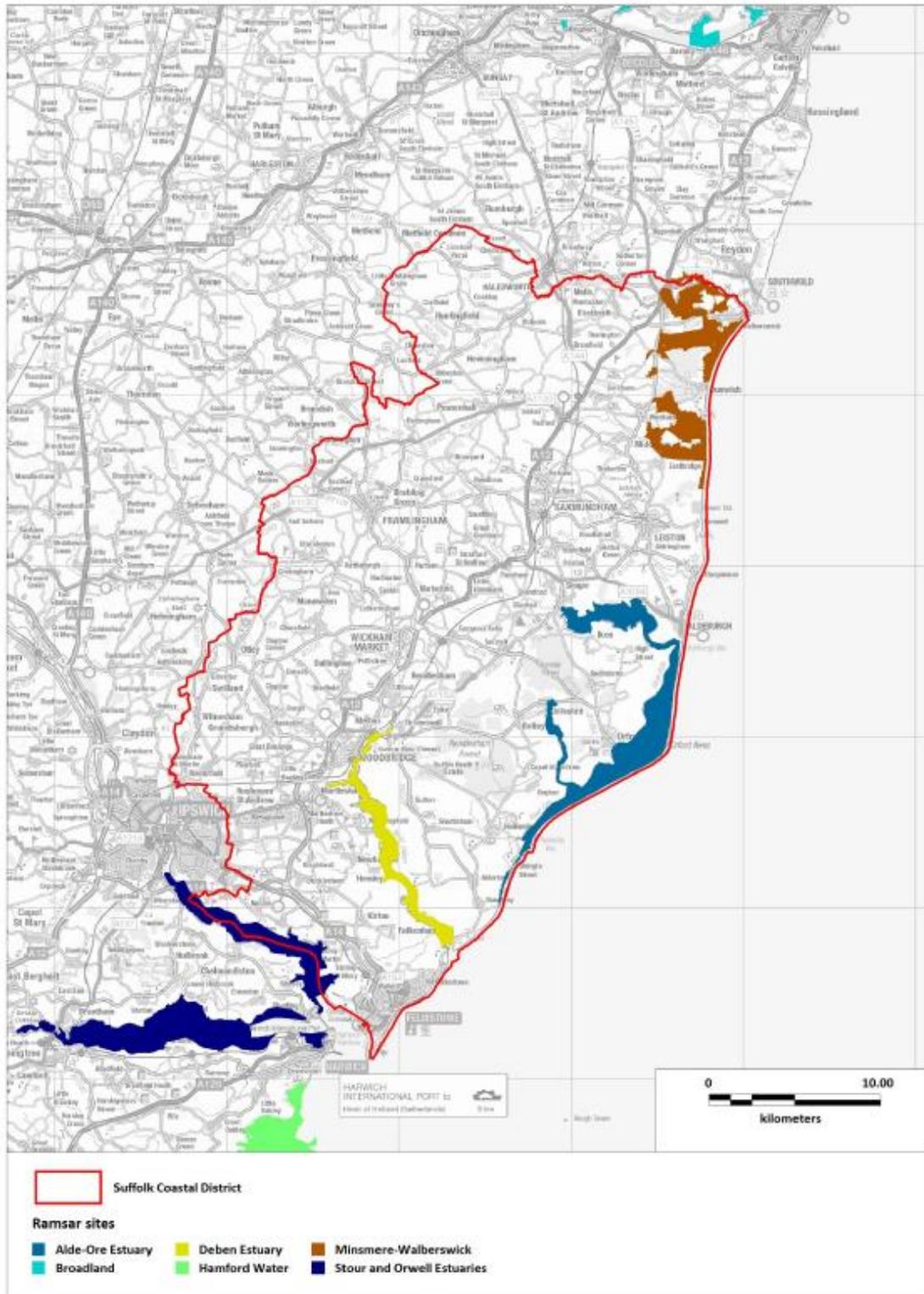
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Map 2: SPA sites where boundary within 20km of Suffolk Coastal District



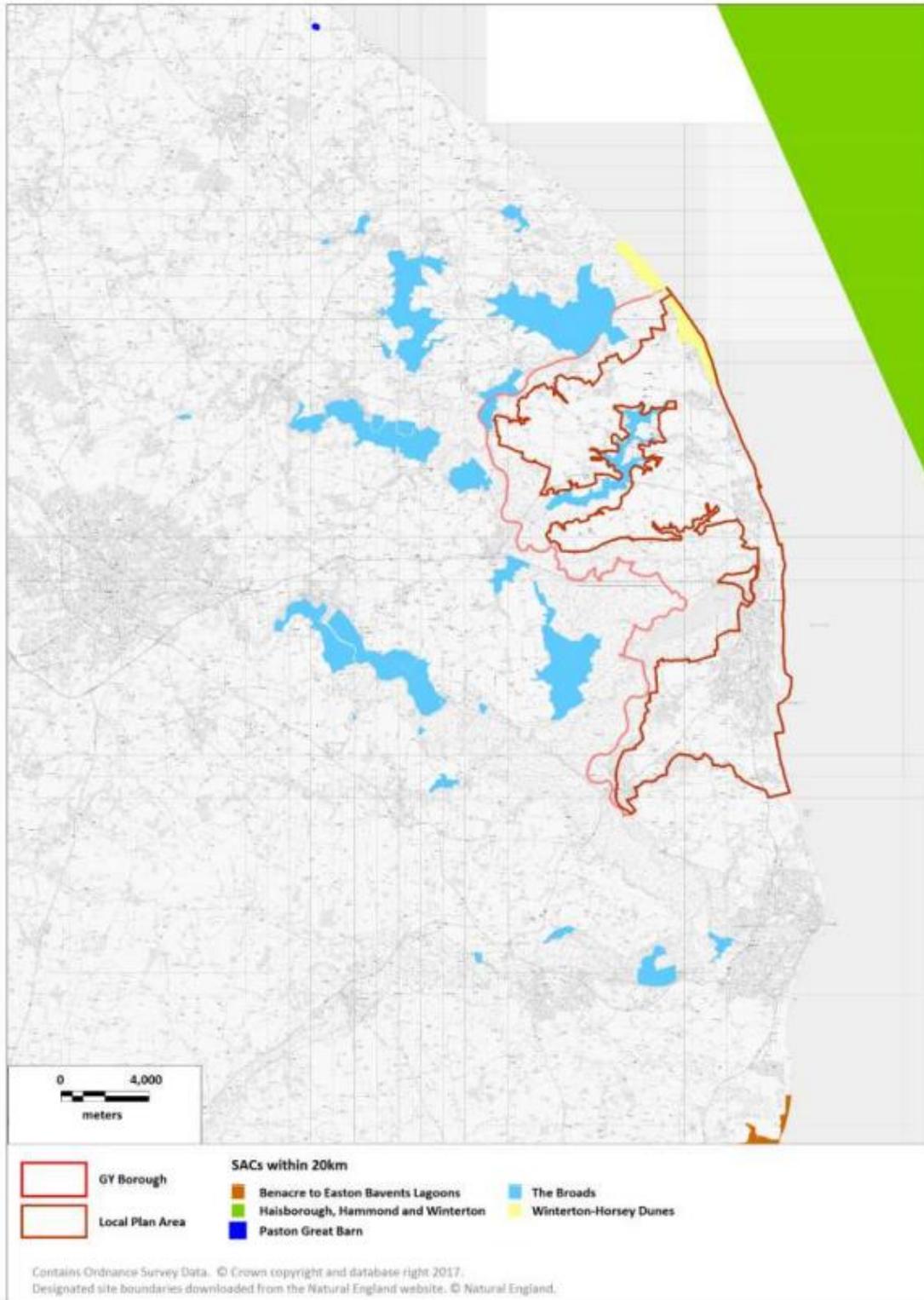
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**Map 3: Ramsar sites where boundary within 20km of Suffolk Coastal District**

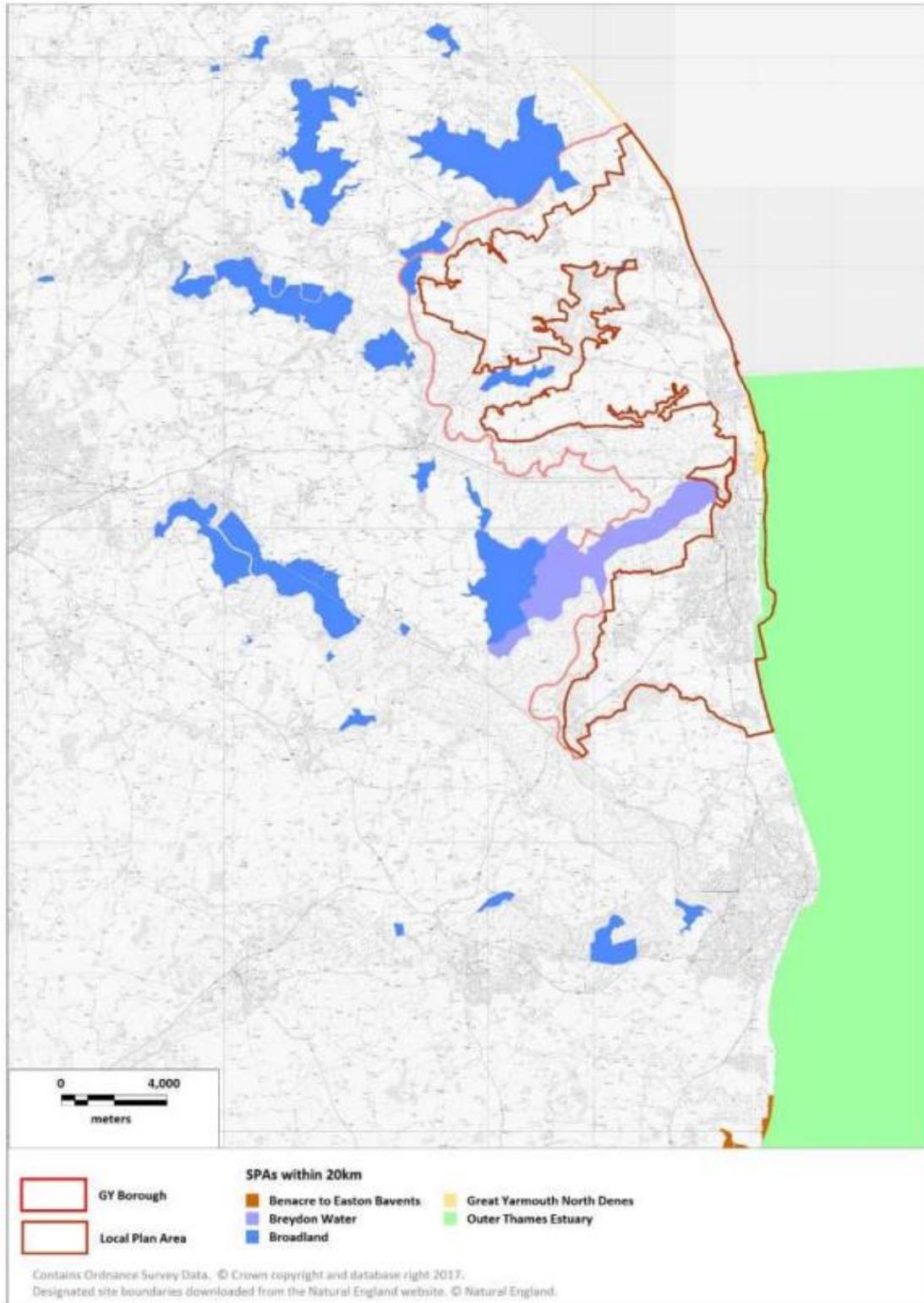


## Habitat sites within 20km of the Great Yarmouth Local Plan Area

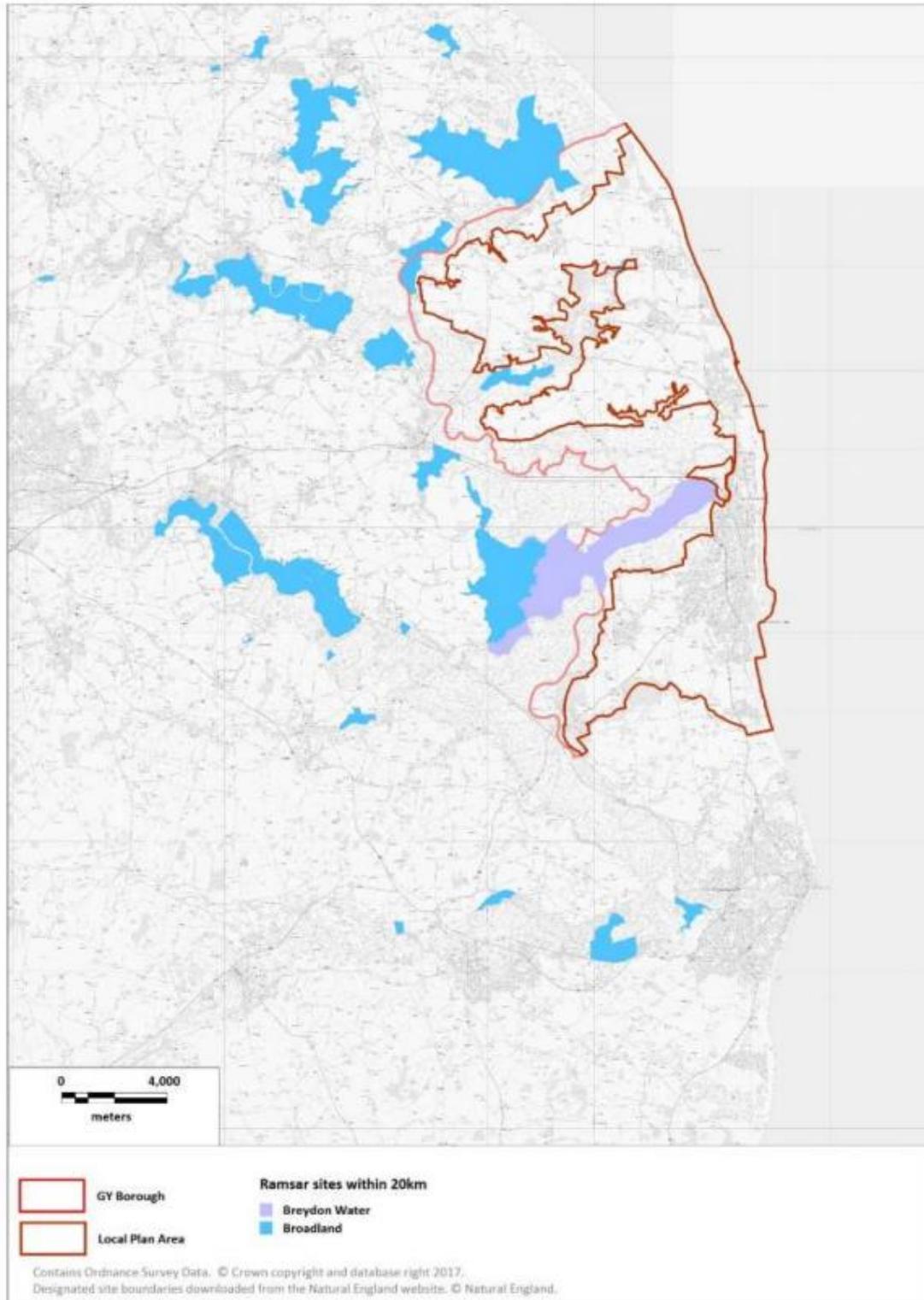
Map 1: SACs and Local Plan Area



Map 2: SPAs and Local Plan Area

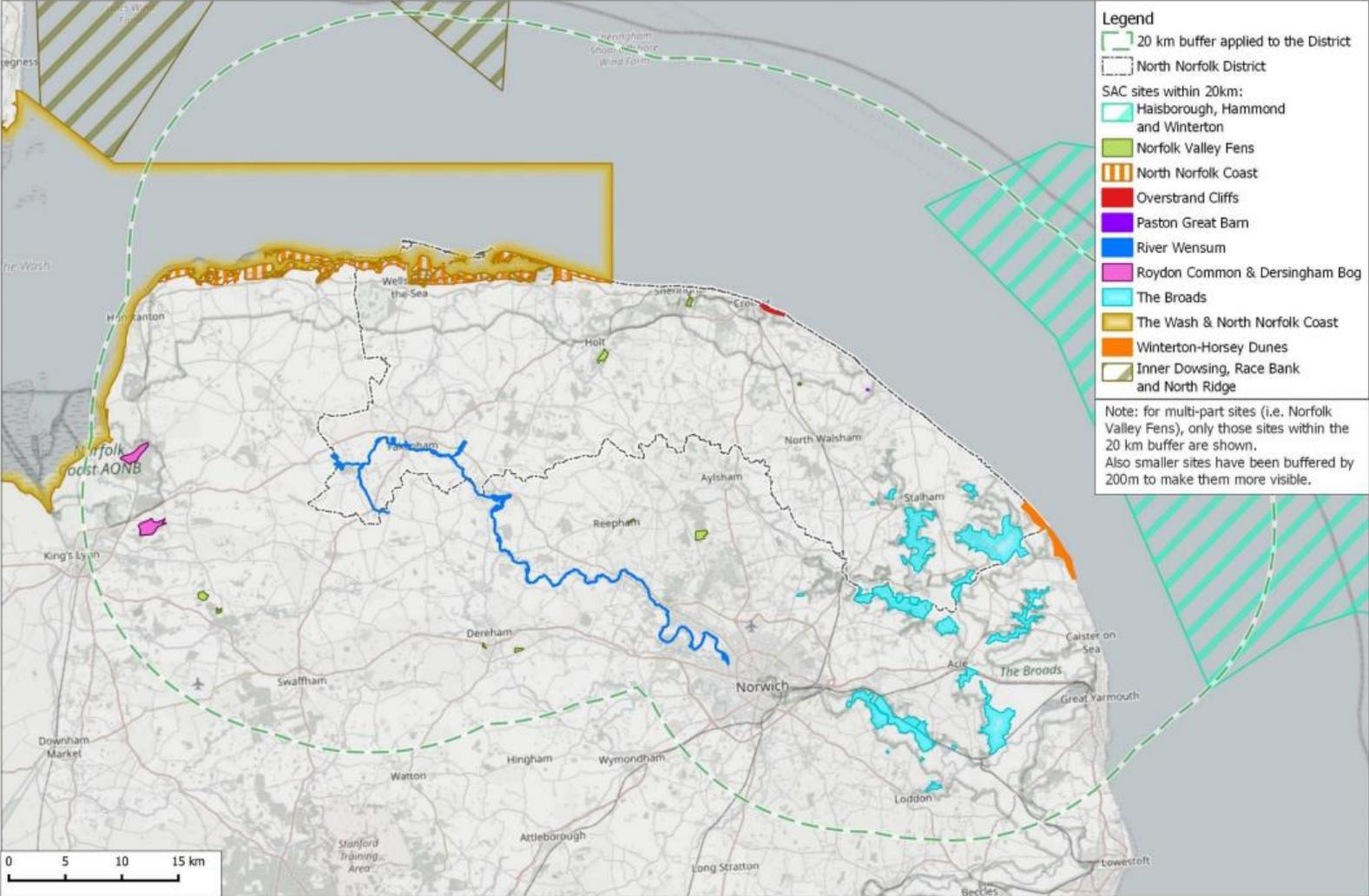


**Map 3: Ramsar sites and Local Plan Area**



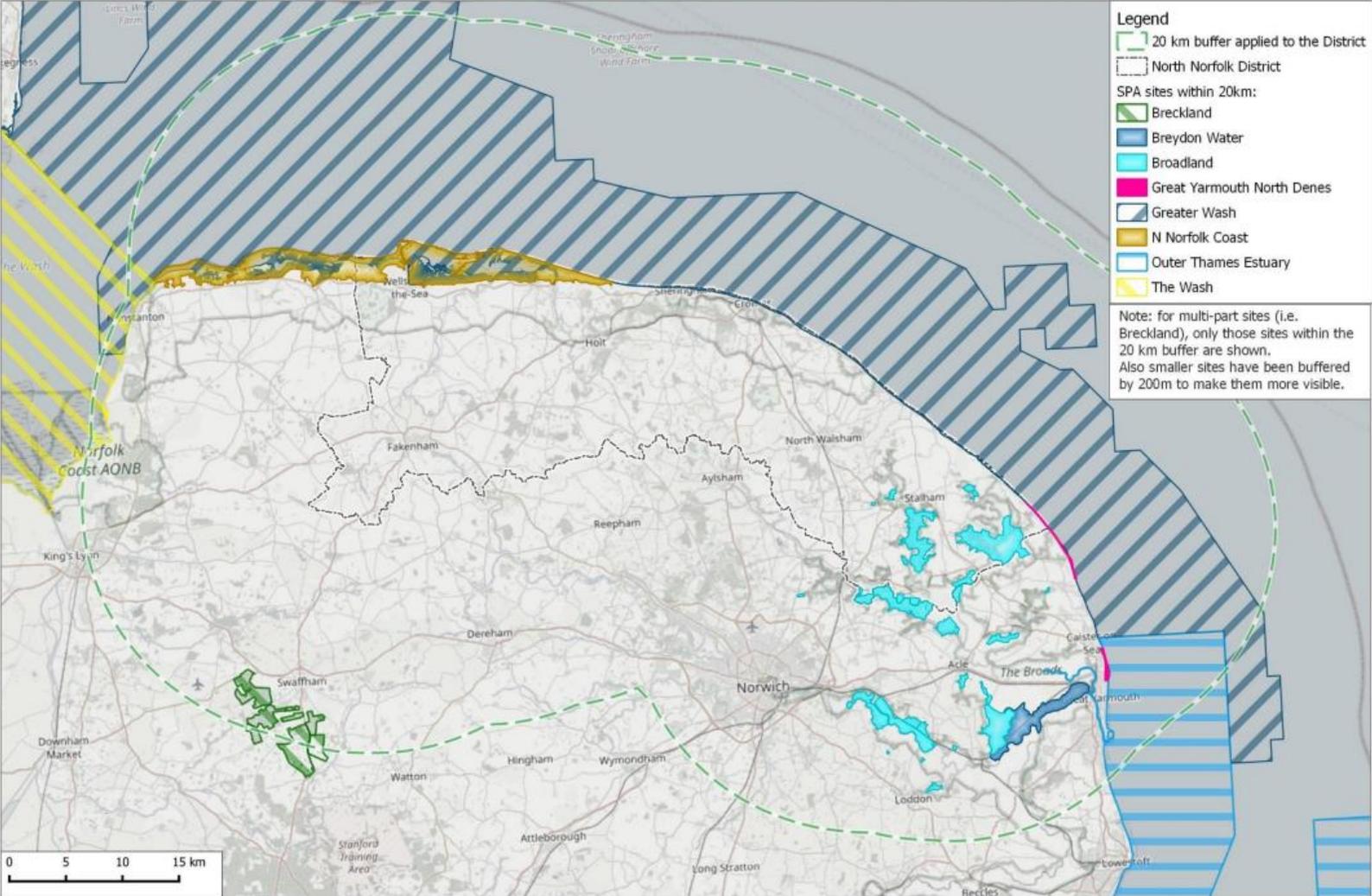
## Habitat sites within 20km of the North Norfolk Local Plan Area

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



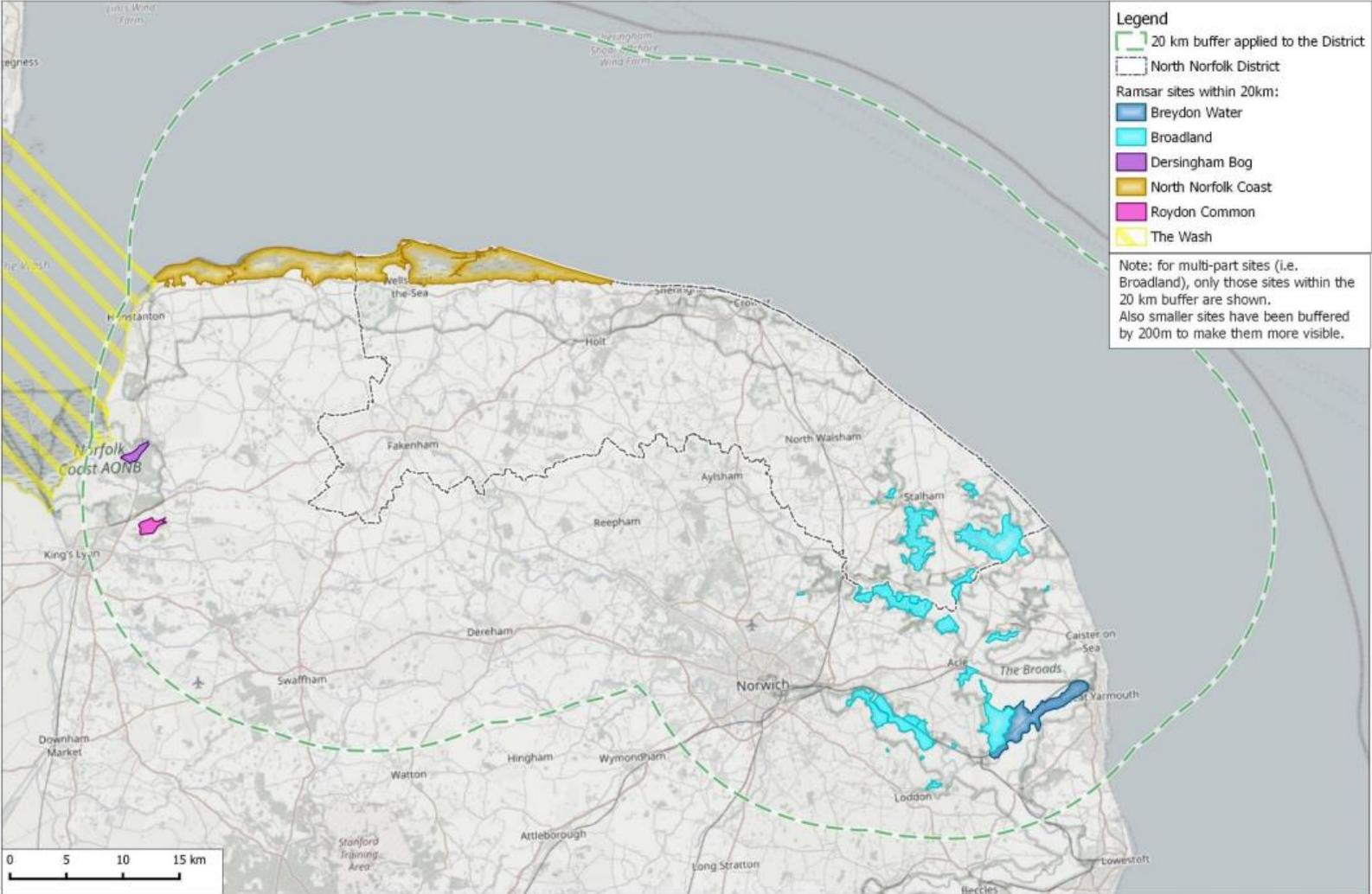
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Map 3: SPA sites located entirely or partially within a 20 km buffer of the North Norfolk District.



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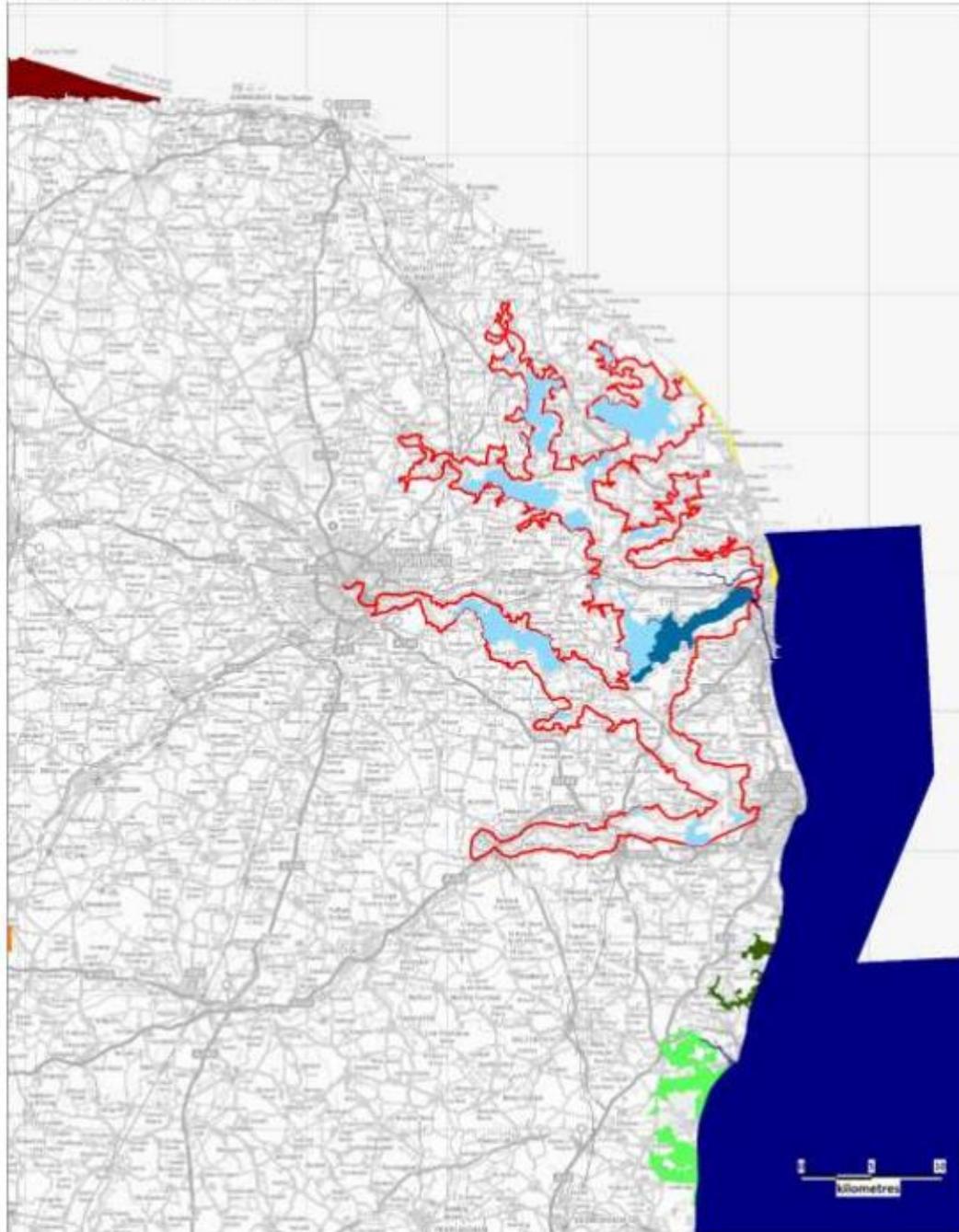
Map 4: Ramsar sites located entirely or partially within a 20 km buffer of the North Norfolk District.



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

Map 2: Selected SPAs



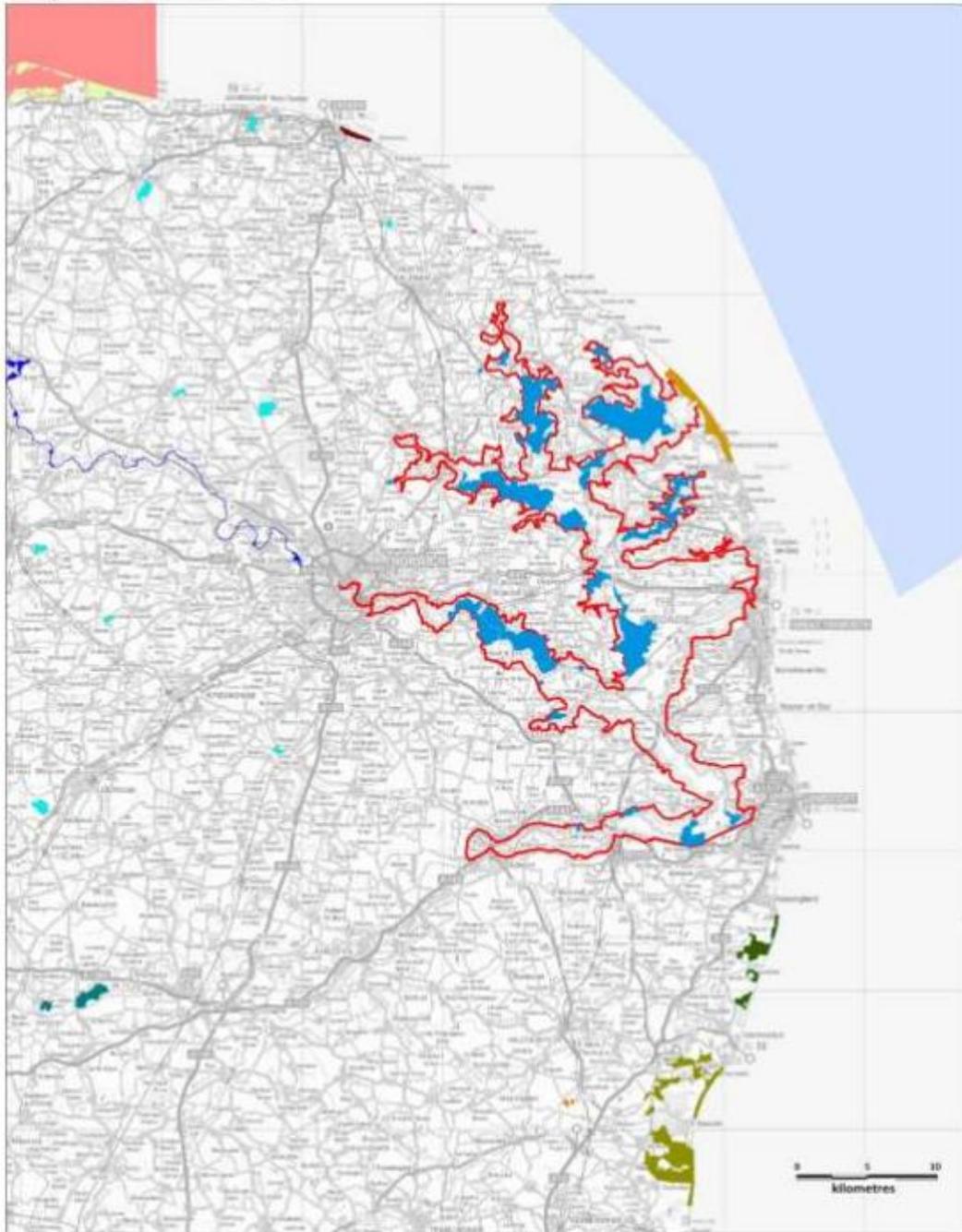
 Broads Authority Executive Area

SPAs

-  Benacre to Easton Bawents
-  Broadland
-  Great Yarmouth North Denes
-  Minsmere-Walberswick
-  N Norfolk Coast
-  Outer Thames Estuary

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**Map 3: Selected SACs**

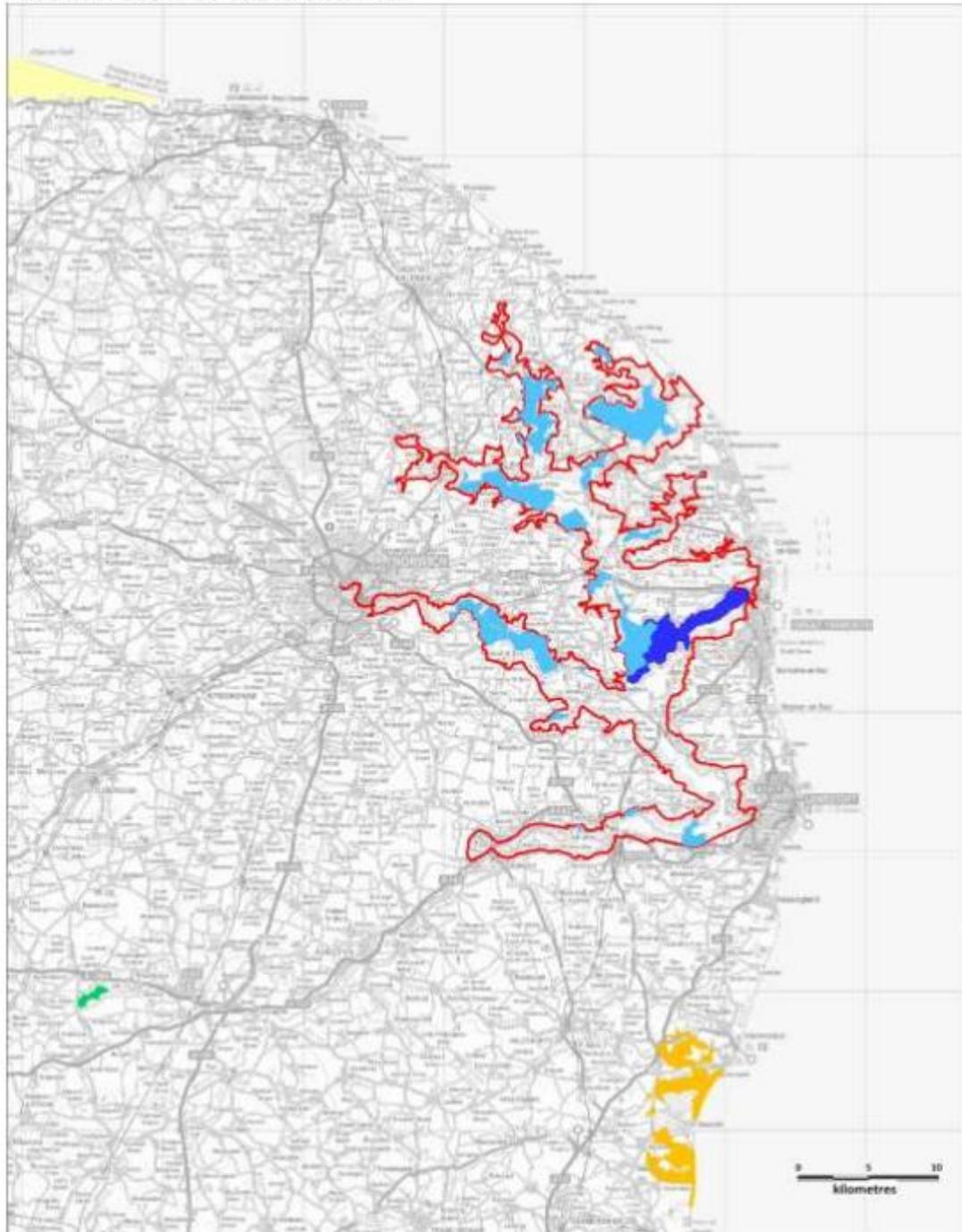


**SACs**

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

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**Map 4: Selected Ramsar Sites**



**Ramsar Sites**

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

Broads Authority Executive Area

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### Appendix 3: Relevant Habitat sites

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

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

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

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

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

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

	<p>H3140 Hard oligo-mesotrophic waters with benthic vegetation of Chara spp</p> <p>H3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation</p> <p>S1355 Lutra lutra: Otter</p> <p>S1903 Liparis loeselii: Fen orchid</p> <p>S4056 Anisus vorticulus: Little ramshorn whirlpool snail</p>	<p>The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely,</p> <p>The populations of qualifying species, and,</p> <p>The distribution of qualifying species within the site.</p>
The Paston Great Barn	<p>S1308: Barbastelle bat Barbastella barbastellus</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <p>The extent and distribution of the habitats of qualifying species,</p> <p>The structure and function of the habitats of qualifying species,</p> <p>The supporting processes on which the habitats of qualifying species rely,</p> <p>The populations of qualifying species, and,</p> <p>The distribution of qualifying species within the site.</p>
The Wash and North Norfolk Coast	<p>H1110 Sandbanks which are slightly covered by sea water all the time</p> <p>H1140 Mudflats and sandflats not covered by seawater at low tide</p> <p>H1150# Coastal lagoons</p> <p>H1160 Large shallow inlets and bays</p> <p>H1170 Reefs</p> <p>H1310 Salicornia and other annuals colonising mud and sand</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; –</p>

	H1330 Atlantic salt meadows ( <i>Glaucopuccinellietalia maritimae</i> ) H1420 Mediterranean and thermo-Atlantic halophilous scrubs ( <i>Sarcocornetea fruticosi</i> ) S1355 Otter, <i>Lutra lutra</i> S1365 Harbour (Common) Seal, <i>Phoca vitulina</i>	<p>The extent and distribution of qualifying natural habitats and habitats of qualifying species</p> <p>The structure and function (including typical species) of qualifying natural habitats</p> <p>The structure and function of the habitats of qualifying species</p> <p>The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely</p> <p>The populations of qualifying species, and,</p> <p>The distribution of qualifying species within the site.</p>
Winterton-Horsey Dunes	H2150# Atlantic decalcified fixed dunes ( <i>Calluno-Ulicetea</i> ) H2190 Humid dune slacks H2110 Embryonic shifting dunes H2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes")	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <p>The extent and distribution of the qualifying natural habitats</p> <p>The structure and function (including typical species) of the qualifying natural habitats, and,</p> <p>The supporting processes on which the qualifying natural habitats rely</p>
<b>Special Protection Areas</b>		
Alde-Ore Estuary (also Ramsar site)	A081: Eurasian marsh harrier (breeding) A132: Pied avocet (non-breeding) A132: Pied avocet (breeding) A151: Ruff (non-breeding) A162: Common redshank (non-breeding) A183: Lesser black-backed gull (breeding)	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:</p> <p>The extent and distribution of the habitats of the qualifying features;</p>

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

<p>Broadlands (also Ramsar site)</p>	<p>H7210# Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i>  S1016 <i>Vertigo moulinsiana</i>: Desmoulin's whorl snail  H7230 Alkaline fens  H6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>)  H91E0# Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>)  H7140 Transition mires and quaking bogs  H3140 Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara</i> spp  H3150 Natural eutrophic lakes with <i>Magnopotamion</i> or <i>Hydrocharition</i>-type vegetation  S1355 <i>Lutra lutra</i>: Otter  S1903 <i>Liparis loeselii</i>: Fen orchid  S4056 <i>Anisus vorticulus</i>: Little ramshorn whirlpool snail</p>	<p>The distribution of the qualifying features within the site.</p> <p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;  The extent and distribution of qualifying natural habitats and habitats of qualifying species,  The structure and function (including typical species) of qualifying natural habitats,  The structure and function of the habitats of qualifying species,  The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely,  The populations of qualifying species, and,  The distribution of qualifying species within the site.</p>
<p>Deben Estuary (also Ramsar site)</p>	<p>A046a: Dark bellied brent goose (non-breeding)  A132: Pied avocet (non-breeding)</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:  The extent and distribution of the habitats of the qualifying features;  The structure and function of the habitats of the qualifying features;</p>

		<p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>
Great Yarmouth North Denes	Little tern <i>Sterna albifrons</i> - A195, b	<p>Subject to natural change, maintain in favourable condition5 the habitats for the internationally important populations of the regularly occurring Annex 1 bird species, under the Birds Directive, in particular:</p> <p>Sand/shingle areas</p> <p>Shallow coastal waters</p>
Greater Wash	<p>Common Scoter, <i>Melanitta nigra</i> - A065, nb</p> <p>Common Tern, <i>Sterna hirundo</i> - A193, b</p> <p>Little Gull, <i>Hydrocoloeus (Larus) minutus</i> - A177, nb</p> <p>Little Tern, <i>Sternula albifrons</i> - A195, b</p> <p>Red-throated Diver, <i>Gavia stellata</i> - A001-A, nb</p> <p>Sandwich Tern, <i>Thalasseus sandvicensis</i> - A191, b</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:</p> <p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>
Outer Thames Estuary	<p>A001: Red-throated Diver (Non-breeding)</p> <p>A195: Common Tern (Breeding)</p> <p>A193: Little Tern (Breeding)</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:</p> <p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p>

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

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

		<p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>
Stour and Orwell Estuaries (also Ramsar site)	<p>A046a: Dark bellied brent goose (non-breeding)</p> <p>A054: Northern pintail (non-breeding)</p> <p>A132: Pied avocet (non-breeding)</p> <p>A141: Grey plover (non-breeding)</p> <p>A143: Red knot (non-breeding)</p> <p>A149: Dunlin (non-breeding)</p> <p>A156: Black-tailed godwit (non-breeding)</p> <p>A162: Common redshank (non-breeding)</p> <p>Waterbird assemblage</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:</p> <p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>
The Wash (also Ramsar)	<p>Bar-tailed Godwit, <i>Limosa lapponica</i> - A157, nb Bewick's Swan, <i>Cygnus columbianus bewickii</i> - A037, nb Black-tailed Godwit, <i>Limosa limosa islandica</i> - A616, nb Common Scoter, <i>Melanitta nigra</i> - A065, nb Common Tern, <i>Sterna hirundo</i> - A193, b Curlew, <i>Numenius arquata</i> - A160, nb Dark-bellied Brent Goose, <i>Branta bernicla bernicla</i> - A675, nb Dunlin, <i>Calidris alpina alpina</i> - A672, nb</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <p>The extent and distribution of the habitats of the qualifying features</p> <p>The structure and function of the habitats of the qualifying features</p>

	<p>Gadwall, <i>Mareca strepera</i> - A051, nb Goldeneye, <i>Bucephala clangula</i> - A067, nb Grey Plover, <i>Pluvialis squatarola</i> - A141, nb Knot, <i>Calidris canutus</i> - A143, nb Little Tern, <i>Sternula albifrons</i> - A195, b Oystercatcher, <i>Haematopus ostralegus</i> - A130, nb Pink-footed Goose, <i>Anser brachyrhynchus</i> - A040, nb Pintail, <i>Anas acuta</i> - A054, nb Redshank, <i>Tringa totanus</i> - A162, nb Sanderling, <i>Calidris alba</i> - A144, nb Shelduck, <i>Tadorna tadorna</i> - A048, nb Turnstone, <i>Arenaria interpres</i> - A169, nb Waterbird assemblage Wigeon, <i>Mareca penelope</i> - A050, nb Bar-tailed Godwit, <i>Limosa lapponica</i> - Wintering Curlew, <i>Numenius arquata</i> - Wintering Dark-bellied Brent Goose, <i>Branta bernicla</i> – Wintering Dunlin, <i>Calidris alpina</i> - Wintering Estuary Grey Plover, <i>Pluvialis squatarola</i> - Wintering Harbour (Common) Seal, <i>Phoca vitulina</i> Knot, <i>Calidris canutus</i> - Wintering Oystercatcher, <i>Haematopus ostralegus</i> - Wintering Pink-footed Goose, <i>Anser brachyrhynchus</i> - Wintering Pintail, <i>Anas acuta</i> - Wintering Redshank, <i>Tringa totanus</i> - Wintering Sanderling, <i>Calidris alba</i> - Wintering Shelduck, <i>Tadorna tadorna</i> - Wintering Turnstone, <i>Arenaria interpres</i> -</p>	<p>The supporting processes on which the habitats of the qualifying features rely The population of each of the qualifying features, and, The distribution of the qualifying features within the site.</p>
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	Wintering Waterbird assemblage - Wintering Wetland invertebrate assemblage	
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## Appendix 4: Natural England Consultation Response

Date: 14 October 2022  
Our ref: 405837



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

████████████████████  
████████████████████  
BY EMAIL ONLY

Dear Laura Mundy

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

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

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

**Summary of response:**

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

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

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

### Comments

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

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

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

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

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

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

Should the proposal change, please consult us again.

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

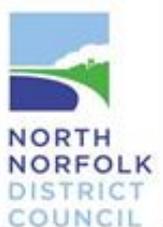
Yours sincerely

Daniel Turner  
Norfolk and Suffolk Team

# Equality Impact Assessment Screening Opinion

## Draft Coastal Adaptation Supplementary Planning Document

October 2022



## Introduction

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

(Coastal Change Rollback or Relocation) provides policy guidance about the relocation of development that has been impacted or destroyed by coastal change, including the provision of replacement housing. Waveney Local Plan policy WLP8.25 (Coastal Change Management Area) provides policy guidance about development within areas impacted by coastal change. Policy WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion) provides policy guidance for development that has been damaged or destroyed by coastal change, which includes providing replacement housing in a safer location.

6. There are no policies in the Broads Local Plan that directly relate to coastal change adaptation, although there is a policy relating to the short stretch of coast in the Broads Authority Executive Area.
7. The Coastal Adaptation Supplementary Planning Document (SPD) provides information and guidance to help communities to cope with the impact of coastal change. Much of the coastal area of this part of East Anglia – especially undefended coastlines – are experiencing rapidly changing coastlines due to erosion. This can lead to the damage or loss of housing and property, as well as land more generally.
8. The Coastal Adaptation SPD seeks to provide additional guidance which will help to deliver the North Norfolk, Great Yarmouth, Suffolk Coastal, Waveney and the Broads Authority Local Plan policies summarised above. The SPD is divided into the following chapters:

#### **Introduction**

9. This chapter sets out the purpose of the SPD and explains who has been involved in its preparation. This includes providing definitions of two key terms: partnership authorities and partnership. The former includes East Suffolk Council, North Norfolk District Council, Great Yarmouth Borough Council and the Broads. The latter includes East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads and CPE.

#### **Chapter 1 – Context: Homes, Businesses, Communities and Environments affected by Coastal Change**

10. This chapter provides the context in which the Coastal Adaptation SPD is being produced and is divided into three key sections, as set out below:

1. What are the geology and coastal processes affecting the coastline?
2. What are the economic, social and environmental benefits enjoyed along the coastline and how are they affected by coastal processes?
3. How is and will climate change affect the coastline?

## **Chapter 2 – Coastal Management Measures and Policies**

11. This chapter provides an overview of the planning policy and guidance context for the SPD, at both the national and local level. The chapter explains that local authorities along the Norfolk and Suffolk Coast work together to implement Integrated Coastal Zone Management, or ICZM. This is a holistic approach to managing coastal change. At the national level, coastal change is covered by the Coastal Erosion Risk Management Policy Statement and the National Planning Policy Statement (NPPF). The NPPF implements the ICZM approach and requires local authorities to create Coastal Change Management Areas. The Planning Practice Guidance on Flood Risk and Coastal Change is also relevant. The text also explains the boundary between the marine and terrestrial planning systems.
12. At the local level the suite of documents includes Shoreline Management Plans, Local Plans and Neighbourhood Plans and the chapter describes the objectives for each document in terms of managing coastal change. It also lists the Local Plans which are covered by the Coastal Adaptation Supplementary Planning Document. It outlines key policies from each of the Local Plans covered by the SPD which relate to Coastal Change Management Areas and Coastal Rollback.

## **Chapter 3 – Development in the Coastal Change Management Area**

13. This chapter provides an explanation of what a Coastal Change Management Area is and summarises the guidance contained in the Planning Practice Guidance. The chapter then provides an explanation of policy about the different types of development that can occur within coastal change management areas, including permitted development. The final section of the chapter provides an overview of the Coastal Erosion Vulnerability Assessment (CEVA), which is used to assess whether a proposed development will be appropriate and seeks to balance the need to maintain the viability of coastal communities against the threat from coastal erosion/change.

## **Chapter 4 – Rollback and Relocation**

14. This chapter sets out the National Planning Practice Guidance relating to rollback and relocation, as well as the Local Plan policies. The chapter provides guidance about when the rollback/relocation of homes and businesses affected by coastal erosion/change would be acceptable and appropriate.

### **Chapter 5 – ‘Enabling’ Development**

15. This chapter explains the concept of enabling development, which is a development that is contrary to policy but is permitted because its public benefits outweigh policy considerations. This is then applied to development that enables the relocation of homes and businesses impacted by coastal change. The chapter provides information about a range of different types of development that are impacted by coastal change and set out, when enabling development may be required and what viability information will be necessary to demonstrate an enabling development case.

### **Appendices**

16. There are also six appendices:
  - i) Norfolk and Suffolk Coastal Authorities Statement of Common Ground
  - ii) Organisation roles and responsibilities
  - iii) Coastal Erosion Vulnerability Assessments Level A & B
  - iv) Case studies
  - v) Neighbourhood Plan Guidance
  - vi) Glossary

### **Equality Act 2010**

- vii) The Equality Act 2010 lists nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation. A tenth characteristic, socio-economic deprivation, is considered in addition to the nine protected characteristics listed in the legislation. This reflects that pockets of deprivation that exist across the SPD area.

## Screening of impact on different groups

	<b>Groups</b>	<b>Likely Impact</b> (positive/negative/no impact)	<b>Reason for your decision</b>
a	Age (Includes safeguarding issues)	No impact	<p>The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group.</p> <p>Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language).</p> <p>The draft SPD consultation will therefore not discriminate against those from different age groups.</p>
b	Disability	No impact	<p>The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group.</p>

			<p>Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language).</p> <p>The draft SPD consultation will therefore not discriminate against those with any disability/ies.</p>
C	Gender reassignment	No impact	<p>The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group.</p> <p>Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language).</p> <p>The draft SPD consultation will therefore not discriminate against those who have undergone gender reassignment.</p>

D	Marriage and Civil Partnership	No impact	<p>The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group.</p> <p>Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language).</p> <p>The draft SPD consultation will therefore not discriminate against those who are married or in a civil partnership.</p>
E	Pregnancy and maternity	No impact	<p>The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group.</p> <p>Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service</p>

			<p>centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language).</p> <p>The draft consultation SPD will therefore not discriminate against those who are pregnant or mothers.</p>
F	Race	No impact	<p>The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group.</p> <p>Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language).</p> <p>The draft SPD consultation will therefore not discriminate against those from different racial backgrounds.</p>
G	Religion or Belief	No impact	<p>The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that</p>

			<p>are at risk from coastal change. It will therefore not discriminate against this group.</p> <p>Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language).</p> <p>The consultation will therefore not discriminate against those different religions or beliefs.</p>
H	Sex	No impact	<p>The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group.</p> <p>Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language).</p>

			The draft SPD consultation will therefore not discriminate in terms of sexual identity.
I	Sexual orientation	No impact	<p>The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group.</p> <p>Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language).</p> <p>The consultation will therefore not discriminate in terms of sexual orientation.</p>
J	Socio-economic deprivation	No impact	<p>The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group.</p> <p>Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online,</p>

			<p>in libraries and in the LPAs’ customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language).</p> <p>The consultation will therefore not discriminate against those who are experiencing economic or social deprivation.</p>
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## Consultation and Engagement

There was an initial process of consultation that guided the preparation of the Coastal Adaptation SPD, which ran from 4<sup>th</sup> September 2020 to 16<sup>th</sup> October 2020. This initial stage of consultation was led by East Suffolk Council but all four organisations were involved in promoting the consultation. The purpose of the initial consultation was to inform the content of the Coastal Adaptation SPD. The consultation took the form of a short document that set out the main aims of the Coastal Adaptation SPD, the local planning policy background relating to development and coastal change and a proposed list of contents. The latter part of the consultation document took the form of a series of questions, the answers to which will inform the content of the future Coastal Adaptation SPD. The consultation document was published on East Suffolk Council’s consultation portal and advertised on the Council’s website and on social media. Consultees on each of the four authorities’ mailing lists were also contacted.

In view of the Covid-19 social distancing measures that prevailed during the initial consultation, the Council had set out measures to enable safe participation in the consultation and to ensure that those who wish to engage in the consultation are not disadvantaged. The Council would normally have made hard copies of consultation documents available to view in libraries and in the Council’s offices for those who are unable to view them online, however as this was not possible to do this at this time due to the Covid-19 pandemic the Council put alternative measures in place. For those unable to view the consultation documents online, hard copies were made available on request (free of charge) by post. In view of these measures the Council did not consider that this initial consultation disadvantaged any of the groups covered by this EQIA screening exercise.

A formal public consultation on the Draft Coastal Adaptation SPD will take place from January 2023 for six weeks. Consultation letters and emails will be sent to consultees on the LPAs' Planning Policy mailing lists. The planning policy mailing lists includes Town and Parish Councils, Suffolk and Norfolk County Councils, neighbouring district councils, developers, agents, landowners, business associations, civic societies, infrastructure providers, and members of the public. A press release will be prepared, and it will be publicised through the councils' social media channels too.

Copies of consultation documents will be available online, and hard copies made available for inspection in libraries and in the LPAs' customer service centres (as appropriate).

Anyone who is unable to view the consultation documents online, in libraries or in the Customer Service Centres can contact the relevant council/authority, and the publicity material provides contact details and an offer of assistance.

## Presentation in Different Languages

As part of a six-week period of formal consultation, the document will be published on the LPAs' websites, with hard copies available on request for those unable to access it online. The document may also be requested in a different language. When such requests are received, the Customer Services Team will be involved with ensuring this request is actioned.

## Proposed Changes

The LPAs will analyse responses received during the public consultation and will make any appropriate changes as a result of comments received.

## Conclusion

This EQIA screening exercise shows that the Coastal Adaptation SPD will not negatively impact upon any protected group or those experiencing socio-economic deprivation. Therefore, a full EQIA assessment is not considered necessary.