

**Examination Library Document Reference - C9**

North Norfolk District Council

# **Background Paper 9**

## **Coastal Change & Management**

A review of evidence to support policy requirements in respect of coastal change and management, including heritage and undeveloped coast designations.

Submission Stage Regulation 22  
**November 2022**

Background Paper 9	Coastal Change & Management
National Legislation and Guidance	<ul style="list-style-type: none"> <li>• National Planning Policy Framework (NPPF) (July 2021)</li> <li>• National Planning Policy Guidance (PPG)</li> <li>• The Marine and Coastal Access Act 2009</li> </ul>
Related Evidence	<ul style="list-style-type: none"> <li>• East Inshore and East Offshore Marine Plans (2014)</li> <li>• Norfolk and Suffolk Coastal Authorities Statement of Common Ground</li> <li>• Strategic Flood Risk Assessment (SFRA) (2018)</li> <li>• North Norfolk Landscape Character Assessment (2021)</li> <li>• Shoreline Management Plan 5: Hunstanton to Kelling Hard (2010)</li> <li>• Shoreline Management Plan 6: Kelling Hard to Lowestoft Ness (2012)</li> <li>• Cromer to Winterton Ness Coastal Management Study (2013)</li> <li>• Pathfinder Project: Evaluation of rollback and leaseback schemes in Coastal Change, Post Project Evaluation &amp; Final Report</li> <li>• River Basin Management Plan - Anglian River Basin District (2015)</li> </ul>

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## 1. Purpose

- 1.1 This is one of a number of Background Papers which have been prepared to help explain and justify various aspects of the new draft Local Plan which is being prepared by North Norfolk District Council.
- 1.2 The purpose of this Background Paper is to set out the policy options in regard to coastal change and management. These findings directly support the coastal policies CC 5: Coastal Change Adaptation, CC 6: Coastal Change Adaptation and ENV 3: Heritage and Undeveloped Coast in the emerging Local Plan.
- 1.3 For information, these policies were previously referred to, at Regulation 18 stage, as policies SD 11: Coastal Erosion and SD 12: Coastal Adaptation. The Heritage and Undeveloped Coast policy remains as Policy ENV 3.
- 1.4 This Background Paper covers the following areas:
  - An overview of coastal management policy, the Pathfinder Project and other relevant legislation;
  - A summary of the key issues;
  - A review of Core Strategy Policies EN 3, EN 11 and EN 12 and consideration of different policy options;
  - A summary of the overall proposed policy approaches for these policy areas;
  - A summary of the feedback received from the Regulation 18 consultation;
  - Conclusions based on feedback and revisions to draft policies SD 11, SD 12
  - ENV 3 (renamed as policies CC 5, CC 6, ENV 3 at Regulation 19 stage).

## 2. Introduction

- 2.1. This Background Paper considers the approach taken towards reviewing planning policies in relation to coastal change and management. The current Core Strategy, adopted 2008, contains policies to limit the types of development permitted within a defined undeveloped coast area (Policy EN 3) and to mitigate and adapt to the impacts of coastal erosion and flooding. Policy EN 11 seeks to restrict development in areas identified as at risk of coastal erosion as defined on the adopted policies map, to ensure no increase in risk to life or property. Policy EN 12 enables replacement and relocation development to occur for those properties within a coastal erosion constraint area, in order for coastal communities to adapt to coastal change, referred to colloquially as the 'roll back policy'. This background paper considers if and how these policies could be taken forward in the new local plan, the considerations and options at Regulation 18 stage and how the approaches were refined in relation to feedback establishing the regulation 19 and proposed submission policies.
- 2.2. The Council has been working in partnership with the coastal authorities in Norfolk and Suffolk, and the Broads Authority, facilitated by Coastal Partnership East (CPE). A Statement of Common Ground has been agreed which sets out the key principles and approaches which the partnership are working towards. The statement sought to establish a set of principles to inform local planning policies to ensure a consistent and aligned approach to planning for coastal management. The agreements helped the signatories discharge their responsibilities under the 'Duty-to-Cooperate' in plan-making as set out in the Planning and Compulsory Purchase Act 2004. Agreements within the statement include sharing best practice and alignment of approaches with regard to planning policies.

See **Appendix 1** for the Norfolk and Suffolk Coastal Statement of Common Ground.

- 2.3. Given the agreements in the Statement of Common Ground and the partnership approach through CPE, it is also considered valuable to prepare a joint Coastal Adaptation Supplementary Planning Document (SPD) for the CPE area. As such, a working group made up of planners from the relevant authorities, the Broads Authority (who cover a small area of coast near Horsey) and officers from CPE, was set up in February 2020. This joint approach allows for a pooling of resources, sharing of best practice and an aligned 'whole coast' approach to correspond with the partnership area. The end result will be an SPD which will provide valuable guidance to officers, developers, communities and other stakeholders on how local planning policies for coastal management should be implemented. SPDs are capable of being a material consideration in planning decisions but are not part of the Development Plan. During the course of the emerging Plan progress has been made on the Coastal SPD and it is expected that consultation will be undertaken on this by the joint authorities late 2022/ January 2023.

- 2.4. The relevant authorities involved in the partnership are East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, the Broads Authority, and the Coastal Partnership East Team, where East Suffolk Council is leading. Each authority is at a different stage with their local plans. East Suffolk Council, has two adopted local plans; the Waveney Local Plan (adopted March 2019) and Suffolk Coastal Local Plan (adopted September 2020). The Broads Authority also has an adopted plan (May 2019) and Great Yarmouth Borough Council had its Local Plan adopted in December 2021.

### **3. Background to the North Norfolk Coast & Policy Context**

#### **The North Norfolk Coast**

- 3.1. The district of North Norfolk has a coastal frontage of approximately 68km stretching from Holkham in the west, to Horsey in the south-east. The full length of the coastline is either at risk from tidal flooding or subject to cliff erosion. The central 34km of the coastal frontage, from Kelling Hard through to Cart Gap, Happisburgh, is characterised by soft glacial cliffs and sandy beaches. This is in contrast to the low lying areas found on either flank. In the west, between Holkham and Weybourne, where there are saltmarshes and an extensive shingle ridge leading to Blakeney Point spit, all designated for their environmental importance. To the east, from Cart Gap to Horsey, are low lying beaches and sand-dunes. A large coast protection scheme at Sea Palling and Winterton was developed in the 1990s to protect the frontage in order to manage possible flooding of the Norfolk Broads.
- 3.2. The low-lying areas are managed by the Environment Agency, are at risk of periodic tidal flooding during storm conditions when the sea can overtop sea defences causing flooding of the land behind. The frontage from Weybourne to Cart Gap is managed by the district council. The coastal erosion of the soft cliffs is a natural process and has been on-going for thousands of years. It was only in the late 19th century that substantial sea defences were constructed in the larger towns on the coast. Many of the current defences, in the form of groynes and revetments were constructed after the Second World War, particularly in the 1950-60s in response to the great flood of 1953 when over 300 people along the east coast lost their lives.
- 3.3. Beaches limit erosion by absorbing the energy of the sea, however, across the east coast, beach levels are generally reducing. This exposes cliffs and defences to a greater action from the sea. Further to this, sea level rise and increased storm events resulting from climate change are likely to impact on erosion rates and in turn put increasing pressure on sea defences and coastal communities.

#### **Shoreline Management Plans (SMPs)**

- 3.4. There are two adopted Shoreline Management Plans (SMPs) which cover the North Norfolk Coast. The Hunstanton to Kelling Hard SMP5 and the Kelling Hard to Lowestoft Ness SMP6 set out coastal policy up to the period 2105 and identify areas at risk from coastal erosion likely to occur to that date, including properties and community

facilities at risk. The area at risk, a Coastal Erosion Constraint Area in the adopted Core Strategy, is identified on the Core Strategy Policies Map.

- 3.5. The SMPs recognise that the continued maintenance of sea defences is neither affordable nor environmentally sustainable. Hard defences prevent erosion of cliffs, reducing the amount of sediment being transported and deposited on beaches further down the coast. This results in lowered beach levels and increased exposure of sea defences which makes them more vulnerable to damage and less effective barriers to erosion. Short, medium and long term risk areas are identified based on 20, 50 and 100 year time periods.
- 3.6. The first SMPs for North Norfolk were published in 1996 (Snettisham to Sheringham (Sub-cell 3a) and Sheringham to Lowestoft (Sub-cell 3b) (Halcrow Fox) and set out the policy approaches for each section of the coast. Work began in 2003 to review the plan and in 2004, a draft SMP for the section between Kelling Hard and Lowestoft was published. This was highly controversial as it signalled policy changes from “Hold the Line” to “Managed Realignment” along a number of frontages but did not take into account the social and economic impacts of such a change in approach. In response, NNDC agreed to conditionally accept the plan urging the Government to include a wider economic appraisal and implement Integrated Coastal Zone Management. A revised version of the plan was subject to public consultation in 2009 and adopted by the council in November 2011. This included wording in the Action Plan that noted that defences would be maintained in the absence of any Adaptation Strategy. The final document signed off by all parties was adopted in 2012 by the Environment Agency. Although the SMP recognises that changes of policy cannot take place until mechanisms to introduce coastal adaptation are introduced, such a coastal management approach is not currently funded by government.

## 4. Overview of relevant Planning Policy relating to Coastal Management

### National Planning Policy Framework (NPPF)

- 4.1. Paragraph 152 of the NPPF (published in July 2021) states that the planning system should support the transition to a low carbon future in a changing climate that takes full account of flood risk and coastal change. Paragraph 153 requires the adoption of a proactive approach to climate adaptation and mitigation strategies by local planning authorities, taking into account coastal change, amongst a number of issues and also that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change (Paragraph 154).
- 4.2. In coastal areas local planning authorities should take account of the UK Marine Policy Statement and marine plans, where Integrated Coastal Zone Management (ICZM) should be pursued across local authority and land/sea boundaries to ensure effective alignment of the terrestrial and marine planning regimes (Paragraph 170).
- 4.3. Paragraph 171 states that local planning authorities should reduce the risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast. It goes on to state that Coastal Change Management Areas (CCMAs) should be identified for areas likely to be

affected by physical changes to the coast and be clear as to what development will be appropriate in such areas and in what circumstances, and that provision is made for development and infrastructure that needs to be relocated away from CCMA's. Development may be considered appropriate in a CCMA only where it is demonstrated that it will be safe over its planned lifetime and not have an unacceptable impact on coastal change; the character of the coast, including designations, is not compromised; the development provides wider sustainability benefits; and that the development does not hinder the creation and maintenance of a continuous signed and managed route around the coast (Paragraph 172). The NPPF defines a CCMA as an area identified in Local Plans as likely to be affected by coastal change, in terms of physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion (page 65 of NPPF).

## National Planning Practice Guidance (PPG): Flood Risk & Coastal Change (July 2022)

- 4.4. Paragraph 70<sup>1</sup> of the National Planning Practice Guidance (PPG) describes Integrated Coastal Zone Management. It explains that it is a process which requires a joined up and participative approach towards the planning and management of the many different elements of in coastal areas. It states that local planning authorities should collaborate with the Marine Management Organisation (MMO) to ensure that plans and policies across the land/sea boundary are coordinated.
- 4.5. Paragraph 072<sup>2</sup> of the PPG states that Shoreline Management Plans (SMPs) should inform the evidence base for planning in coastal areas. Predictions of future impacts should include the long term nature and uncertainty of coastal processes. It explains that CCMA's should only be defined where the rates of shoreline change are expected to be significant over the next 100 years taking account of climate change. They do not need to be defined in areas where the accepted shoreline management plan policy is to hold or advance the line for the whole period covered by a local plan, subject to evidence of how this may be secured. The guidance states that SMPs are the primary source of evidence in defining the CCMA, but that other sources may also inform decisions such as; catchment flood management plans, estuary management plans, harbour management plans, river basin management plans and the Environment Agency's coastal erosion map.
- 4.6. Paragraph 073<sup>3</sup> sets out what development might be appropriate in CCMA's. It states that essential infrastructure (transport and utility infrastructure, wind turbines water treatment works etc.) may be permitted in a CCMA provided there are clear plans to manage the impacts of coastal change on the development and it will not have an adverse impact on the rates of coastal change elsewhere. For other types of development it gives some criteria:
  - Short term risk areas (ie.20 year time horizon) only development directly linked to the coastal strip, such as, beach huts, cafes/ tea rooms, car parks and sites used for holiday/short let caravans and camping -all with time-limited permissions.

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(1) PPG Paragraph: 070 Reference ID: 7-070-20140306

(2) PPG Paragraph: 072 Reference ID: 7-072-20140306

(3) PPG Paragraph: 073 Reference ID: 7-073-20140306



- Medium term risk area and long term risk area (20-50 year and 50-100 year time horizons) a wider range of time limited development, such as, hotels, shops, offices or leisure facilities requiring a coastal location and that provide substantial economic and social benefits to the community. Key community infrastructure is unlikely to be considered-appropriate unless it has to be located in the CCMA to provide benefit to the wider community and that there are clear, costed plans to manage the impact of coastal change on the development and the services it provides. The guidance makes clear that permanent new residential development will not be appropriate within the CCMA.
- 4.7. Paragraph 12<sup>4</sup> states that formally allocating land in Local Plans for the relocation of development and habitat affected by coastal change may be appropriate in some instances. It also acknowledges that it may be more suitable for some local authorities to adopt an approach of allowing relocation to areas where development would normally be refused planning permission.
- 4.8. Paragraph 75<sup>5</sup> states that council's should consider whether to make an Article 4 Direction to control extensions and alterations that are permitted development under the Town and Country Planning (General Permitted Development) (England) (Order) 2015, in areas at short term risk from coastal change.
- 4.9. Paragraph 76<sup>6</sup> states that Neighbourhood Plans and neighbourhood development/ Community Right to Build Orders should avoid allowing inappropriate development in areas vulnerable to coastal change or adding to the impacts of physical changes to the coast.

## East Marine Plans 2014

- 4.10. The East Inshore and East Offshore Marine Plans cover the marine area from Flamborough Head in Yorkshire to Felixstowe in Suffolk. The plans set out a strategy and suite of policies to manage activities in the inshore and offshore marine areas over the period to 2034. The plans come up to the mean high water mark, so there is a small overlap with the terrestrial planning system. Paragraph 254 refers to the NPPF support for the integration of the terrestrial and marine planning system. ICZM is recommended as a format for integrating with terrestrial planning. It is also recognised in this paragraph that decisions in the marine area and on land can have an effect over a considerable distance.

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(4) PPG Paragraph: 012 Reference ID: 7-012-20220825

(5) PPG Paragraph: 075 Reference ID: 7-075-20220825

(6) PPG Paragraph: 076 Reference ID: 7-076-20220825

## 5. Overview of Coastal Management Policy, the Pathfinder Project and Other Relevant Legislation

### SMP5 & SMP6

- 5.1. SMPs provide a strategic assessment of the risks associated with coastal change and provide estimates of how the coast is likely to change over the next 100 years, taking into account the future implementation of coastal policies, geology, likely impacts of climate change and the existing condition of the coast including coastal defences.
- 5.2. As outlined in Section 3.4 above, two SMPs are active along the North Norfolk coastal frontage. These are SMP5 Hunstanton to Kelling Hard (published 2010) and SMP6, Kelling Hard to Lowestoft Ness (adopted 2012) . The plans -provide high level management policy which, identifies the best ways to manage flood and erosion risk to people and the built and natural environments, in relation to three time periods: up to 2025 (short term), 2026-2055 (medium term) and 2056-2105 (long term).
- 5.3. The Shoreline Management Plans identify four policy approaches:
  - Hold the line (HtL): this involves holding the defence system where it is now by maintaining or changing the standard of protection. This policy should cover those situations where work or operations are carried out in front of the existing defences (such as beach recharge), rebuilding the toe of a structure, building offshore breakwaters and so on. This includes - 4 - other policies that involve operations to the back of existing defences (such as building secondary flood walls) where they form an essential part of maintaining the current coastal defence system.
  - Advance the line (AtL): this involves building new defences seaward of the existing defence line. If relevant, this policy should only be used on those stretches of coastline where significant land reclamation is considered.
  - Managed realignment (MR): this involves allowing the shoreline to move seaward or landward, with associated management to control or limit the effect on land use and environment. This can take various forms, depending on what we want to achieve. All are characterised by managing change not only technically (by breaching and building defences) but also for land use and environment (by aiding or ensuring adaptation).
  - No active intervention (NAI): this involves no further investment in coastal defences or operations.

The adopted SMP6: Kelling Hard to Lowestoft Ness, identifies coastal policy up to the period 2105 and identifies areas at risk from coastal erosion likely to occur to that date. It identifies properties and community facilities at risk. The area, a Coastal Erosion Constraint Area in the adopted Core Strategy, is identified on the Core Strategy Policies Map. This equates with the Coastal Change Management Areas referred to in the NPPF.

- 5.4. North Norfolk District Council adopted the Kelling Hard to Lowestoft Ness SMP in 2012 with significant conditions attached to the overall strategic policy aim of the SMP. This

requires that social mitigation to be identified before changes to policies can take effect. Other policies are conditional upon the outcomes of further studies and of future monitoring to record what is happening to habitats and species as well as to the coast itself. The policy options set out in the SMP for each frontage are shown in the table below.

**Table 1: SMP6 Policy Framework by unit**

<b>Policy Unit</b>	<b>Name</b>	<b>From Present To 2025</b>	<b>Medium Term 2025-2055</b>	<b>Long Term 2055-2105</b>
6.01	Kelling to Sheringham	No Active Intervention	No Active Intervention	No Active Intervention
6.02	Sheringham	Hold the Line	Hold the Line	Hold the Line
6.03	Sheringham to Cromer	Managed Realignment	No Active Intervention	No Active Intervention
6.04	Cromer	Hold the Line	Hold the Line	Hold the Line
6.05	Cromer to Overstrand	No Active Intervention	No Active Intervention	No Active Intervention
6.06	Overstrand	Hold the Line	Managed Realignment	Managed Realignment
6.07	Overstrand to Mundesley	Managed Realignment	No Active Intervention	No Active Intervention
6.08	Mundesley	Hold the Line	Hold the Line	Managed Realignment
6.09	Mundesley to Bacton Gas Terminal	Managed Realignment	No Active Intervention	Active Intervention
6.10	Bacton Gas Terminal	Hold the Line	Hold the Line	Hold the Line
6.11	Bacton, Walcott & Ostend	Hold the Line	Managed Realignment	Managed Realignment
6.12	Ostend to Eccles	Managed Realignment	Managed Realignment	Managed Realignment
6.13	Eccles to Winterton	Hold the Line	Hold the Line	Conditional Hold the Line

- 5.5. The SMP identifies major infrastructure, such as parts of the coast road at Trimmingham and the B1159 at Walcott, the sewage pumping station at Overstrand, as well as caravan parks and properties potentially at risk by 2055.
- 5.6. The Shoreline Management Plan indicates possible properties at risk within each sub-cell and epoch. Over the frontage some 325 residential properties could be at risk by 2055 and over 900 by 2105. The main areas of risk are Bacton, Walcott and Ostend, Overstrand, Trimmingham and Sidestrand and Mundesley. (Appendix 3 gives a summary of the SMP by sub-cell).

- 5.7. Since the adoption of the SMP, considerable additional work has been undertaken to examine coastal processes in north Norfolk and to refine the policy positions in the SMP. On-going maintenance work takes place across the NNDC coast line to maintain defences and some £310,000 is spent annually on coastal defences. Following the storm surge in December 2013 considerable additional funding was spent on repairs to sea defences along the coast.
- 5.8. Additionally, the Cromer Coast Protection Scheme (Phase 1) has been implemented with phase 2 to be completed by 2021. The scheme aims to protect the town by improving sea defences to withstand approximately 50 years of sea level rise. The work completed includes provision of sheet pile foundations, re-facing existing walls with concrete, improving the parapet walls where necessary and repairing timber groynes. The scheme was fully-funded by the Department for Environmental, Food and Rural Affairs (DEFRA) via the Environment Agency with 'Flood and Coastal Risk Management Grant in Aid' of approximately £8 million.
- 5.9. The 2005 DEFRA SMP guidance suggested some form of review at least every 5 years. The need for such a review is to ensure that any implications of new legislation, knowledge and information since the SMP's were developed is being taken into account. As such, the updates are seen as a 'refresh' rather than a full review/rewrite. The updated documents for SMP5 and SMP6 are awaited.

### Cromer to Winterton Ness Coastal Management Study

- 5.10. The Cromer to Winterton Ness Coastal Management Study (2013)<sup>5</sup> follows on from the SMP6 and provides recommendations for individual schemes to be taken forward for CCERM Grant in Aid. This study improves understanding of the coast under different coastal management options and stresses the need for adaptation mechanisms for communities to address the impacts of coastal change.
- 5.11. Although the study generated indicative erosion lines under different coastal management options, these do not supersede those in the adopted SMP6. Three management scenarios were considered in order to represent a range of policies along the coastline compared with a do-nothing baseline scenario:
- SMP6 Scenario;
  - Modified SMP6 Scenario; and
  - SMP6 with Sediment Nourishment Scenario.

These scenarios were considered across the whole study frontage and at smaller-scale units. Longshore sediment transport refers to the process where sediment is moved along the coast by the waves. This process is particularly important in the context of this study as it is through the transport (or lack of transport) of sediment along the coastline that coastal management policies in one area can affect another area further along the coast. The overall drift of sediment in the study area moves from west (at Cromer) to east (at Winterton Ness).

- 5.12. Wave action on the coastline, particularly on beaches and at the base of the cliffs, causes erosion and retreat of the coastline. The amount of erosion caused by wave action depends on a number of factors, one of which is the geometry (alignment) of

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<sup>5</sup> [https://www.north-norfolk.gov.uk/media/3134/c2ws\\_cromer\\_to\\_winterton\\_ness\\_study\\_report.pdf](https://www.north-norfolk.gov.uk/media/3134/c2ws_cromer_to_winterton_ness_study_report.pdf)

the coastline. In situations where the geometry of the coastline is uneven, exposed areas (headlands) are formed. Waves can become concentrated at the exposed areas often causing increased erosion. The study identified that the SMP6 with Sediment Nourishment Scenario represents the best option at a frontage wide scale and recommended taking forward to schemes to the next stage at Overstrand and Mundesley and at Bacton, Walcott and Ostend.

5.13. Schemes in North Norfolk currently in development or completed, including those arising from the study, include:

- Cromer Phase 2 (approximately £2.5m)
- Bacton to Walcott Coastal Management Scheme<sup>6</sup> (£22m innovative “landscaping” scheme as used in the Netherlands to deliver approximately 1.5million m<sup>3</sup> of sand to build up the beach to provide natural protection to the coastline, particularly the Gas terminal and the villages of Bacton and Walcott)
- Mundesley Coastal Management Scheme<sup>7</sup> (approx. £3m) scheme to refurbish timber groynes and sea wall aprons, deck and scour protection above the sea wall and placement of rock armour to support groynes and sea wall)

## Pathfinder Project

5.14. Between 2009 and 2011, East Riding of Yorkshire Council, North Norfolk District Council, Scarborough Borough Council, Tendring District Council and Waveney District Council received a significant proportion (nearly £8 million) of non-ring fenced funding to develop and implement innovative approaches to planning and coastal management. Where the Shoreline Management Plan recommends a policy of managed realignment or no active intervention, it is clear that Local Authorities need sustainable approaches to reduce future burdens on coastal communities, remove constraints and blight, reduce the tendency towards negative attitudes and encourage a more positive approach to the issues faced by communities and individuals and look to encourage growth in a sustainable manner.

5.15. A number of rollback schemes have also been investigated as part of the North Norfolk Pathfinder, with significant progress having been made with regards to the rollback of residential properties, a caravan park and the cliff top car park in Happisburgh, the village hall in Trimmingham and a footpath in Cromer.

5.16. A key Pathfinder project was the purchase and demolition of nine residential properties in Happisburgh which were at imminent risk of coastal erosion. As part of the project planning permission was granted for the construction of replacement properties in the village further inland. The site has now been sold by the council and landowner to a developer, who will build-out the scheme. The outcomes included an enhanced cliff top environment, removing the blight associated with the at-risk properties (that were becoming increasingly dilapidated from lack of maintenance), and bringing confidence to the local housing market through the new investment in the replacement development. This was achieved with the support of the owners of

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<sup>6</sup> <https://www.north-norfolk.gov.uk/tasks/coastal-management/bacton-to-walcott-coastal-management/>

<sup>7</sup> <https://www.north-norfolk.gov.uk/tasks/coastal-management/mundesley-coastal-management-scheme/>

those properties, who, through the process followed, were able to recover substantial value from their properties that were previously considered virtually worthless, liberating them to make choices about their own futures. The approach was a test of the Councils own coastal 'rollback' planning policy (Core Strategy EN12) and provided lessons for similar cases elsewhere in the district (and around the UK). It should be noted that this would not have been achieved without the funding from Pathfinder.

- 5.17. Considerable progress has also been made with regards to relocating the caravan park to an inland location in Happisburgh with a suitable alternative location with planning permission and infrastructure now being installed. The Pathfinder Project has enabled the re-provision of 12 plots which were lost to erosion on an adjacent part of the site which had previously been refused planning consent. Further improvements have also been made to the resilience of the site by adapting the sewerage infrastructure to ensure plots remained viable as the coast erodes.
- 5.18. The Council is committed to developing solutions to assist communities in the process of adapting in advance of property loss. The aim is to ensure investment continues to be made in businesses, homes and community facilities - even in communities imminently threatened by erosion. Timely action will not only help maintain the benefits of those uses to the local community but can help combat the blight which might otherwise occur. Removing properties in advance of their inevitable loss, and before the onset of dereliction, can help sustain the vitality of erosion hit communities. The Council can access a grant to assist in meeting the costs associated with demolishing residential properties at risk from coastal erosion. These funds (of up to £6,000) can be made available to property owners to help with such things as: obtaining the relevant consents, demolition works, the removal of waste materials and any landscaping or remedial works.
- 5.19. In order to promote the use of policy EN12, the council has established a Coastal Rollback Register to help landowners and property owners make contact with each other. Landowners can submit an expression of interest for land to be included in the register that they may be willing to make available for roll-back development. The register will then be made available (on request) to coastal property owners and others wishing to promote such schemes. The rollback of Trimmingham village hall has also progressed with a relocation site having been purchased. Fundraising has enabled this scheme to move forward and the building work is nearing completion.
- 5.20. The Pathfinder also commissioned a report<sup>8</sup> on the Housing Market Appraisal of Happisburgh in order to assess the impact of the change in coastal policy, as foreshadowed in the draft Shoreline Management Plan, on the housing market in Happisburgh in comparison with North Walsham (an area unaffected by erosion) and Overstrand (a village also affected by erosion). The report concluded that there was a lack of robust statistical evidence to support or reject the contention that coastal erosion and the changes introduced in the Shoreline Management Plan directly impacted on the performance of the housing market in Happisburgh. However, a survey of estate agents suggested that the Happisburgh area was performing poorly in comparison to other local markets. And all commented on coastal erosion as a factor

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<sup>8</sup> Coastal Pathfinder Programme Housing Market Appraisal of Happisburgh 2000 to 2010 (December 2010)  
[https://www2.north-norfolk.gov.uk/pathfinder/happisburgh\\_lease.asp](https://www2.north-norfolk.gov.uk/pathfinder/happisburgh_lease.asp)

with one specifically referring to the market turning on “the abandonment of coastal protection policies”.

## Adapting to Coastal Erosion - Evaluation of rollback and leaseback schemes in Coastal Change Pathfinder Projects (2015)

- 5.21. The evaluation report, published in July 2015<sup>9</sup> sought to provide Defra with evidence of whether rollback and buy/leaseback are desirable and feasible options for Local Authorities affected by coastal change, and to provide new approaches to adapting to coastal change where this is the case. The evaluation was based on a case study methodology in five locations. Information and documents were collected from each case study and a number of interviews carried out in each location. Rollback is defined as the relocation/replacement of at risk property and infrastructure to areas inland away from the eroding coastline. Leaseback (or buy to leaseback) is defined as the process of purchasing an at-risk property and leasing it out for the remainder of its economic life. Leaseback has not been pursued so is not considered in the study.
- 5.22. The study identified a number of issues common to each Pathfinder project, including legal issues with enforcing demolition and identification of suitable alternative land. Three planning policies were regarded as having the potential to enable rollback: allow for conversion of at risk buildings to temporary, alternative use, such as holiday lets; make rollback development an exception to avoid excessive development; and enabling development with clear policies and legal obligations to avoid misuse. All of the Pathfinder projects found that the ability for property owners to afford to buy land and rebuild was a key barrier to rollback.

The study found that:

- Rollback, with the right policies and mechanisms in place, is a feasible adaptation option that is desirable from the perspective of the Local Authority and the individuals at imminent risk of coastal erosion.
- Buy-in at the community level can be more difficult to achieve, but effective communication can increase awareness and understanding of the situation (in terms of the options available in the wider context of coastal erosion issues) and thus increase desirability.
- The problems encountered in the Pathfinder projects provide valuable lessons for other Local Authorities in terms of expected issues and how to overcome them.
- Rollback could be economically worthwhile, hence, there should be opportunities for rollback (and adaptation more widely) to be considered for funding under FCCERM GiA.

## Coastal Change Pathfinder Review - Final Report, 2012

- 5.23. In 2012, Defra carried out a high level evaluation of the Coastal Change Pathfinder Programme, which aimed to road test new and innovative approaches to planning for

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<sup>9</sup> [http://evidence.environment-agency.gov.uk/FCERM/Libraries/FCERM\\_Project\\_Documents/FD2679\\_report.sflb.ashx](http://evidence.environment-agency.gov.uk/FCERM/Libraries/FCERM_Project_Documents/FD2679_report.sflb.ashx)

and managing coastal change. Fifteen local authorities received nearly £11m under the programme which ran between December 2009 and March 2011 (though most Pathfinders have continued beyond this). This study looked at value for money, but was undertaken before many of the projects had been completed. It concluded that the programme has delivered a significant number of benefits and has represented good value for money overall.

### Anglian River Basin District: River Basin Management Plan (RBMP) 2009 (Updated 2015)

5.24. The RBMP for Anglia sets out actions to address the pressures on water quality under the Water Framework Directive. The majority of policy options aim to achieve good water quality status by 2015 under a 6 year planning cycle. The 2015 updated version includes predicted outcomes to 2021 and their objectives. It is noted in the RBMP that large areas of hinterland lie below sea level which are defended by a combination of natural defences, old sea walls and newer sea defences.

### Strategic Flood Risk Assessment (SFRA) 2018

5.25. A revised Strategic Flood Risk Assessment (SFRA) has been prepared for the Norfolk local planning authorities by JBA consulting and was published in January 2018. The assessment provides a set of maps and sets out up to date information and guidance on flood risk from all sources of flooding including the impact of climate change.

5.26. In summary, tidal surges and a combination of tidal and fluvial flooding are the most significant flood risks in north Norfolk. Significant rivers and their tributaries within the district that contribute towards flood risk include the Wensum, Bure, Stiffkey, Glaven, Ant and Thurne. In addition, the North Norfolk CFMP (2009) identified that flooding from the Mundesley Beck is an issue in the settlement of Mundesley. The Anglian coast modelling for Wells-next-the-Sea had not been completed at the time of publication. The SFRA has, therefore, been updated by way of an addendum. Following confirmation that the Environment Agency had signed off on the Wells-Next-The-Sea coastal model in February 2018 relevant updates were made to the SFRA data. The addendum report, dated 12/04/2018, provides an account of the alterations made to the Wells-Next-The-Sea coastal model.

### England Coastal Path and Coastal Margin

5.27. The England Coast Path is a new long-distance trail that will eventually allow people to walk around the whole English coast, designated under the CROW and Marine and Coastal Access Acts. Natural England has a statutory duty to provide this path and an updated map (February 2021) sets out the various stages of progress for the trail.

5.28. Part 9 of the Marine and Coastal Access Act 2009 (“the 2009 Act”) aims to improve public access to, and enjoyment of, the English coastline by creating clear and consistent public rights along the English coast for open-air recreation on foot. It allows existing coastal access to be secured and improved and new access to be created in coastal places where it did not already exist. Section 296 of the Act places a



duty on Natural England and the Secretary of State to use their powers to secure the twin objectives:

- To secure a route around the whole of the English coast (an approved mapped line not a physical path); and,
- To secure an associated margin of land for the public to enjoy.

The margin includes all land between the trail and the sea. It may also extend inland from the trail if:

- (i) it's a type of coastal land identified in the Countryside and Rights of Way Act 2000 (CROW Act), such as beach, dune or cliff
- (ii) there are existing access rights under section 15 of the CROW Act
- (iii) Natural England and the landowner agree to follow a clear physical feature landward of the trail.

5.29. With regards to North Norfolk, Natural England's map (February 2021) confirms that the westernmost section of the path, up to Weybourne has proposals published but not yet approved and that eastwards from Weybourne, it states that the England Coast Path and associated access rights are now open.

5.30. Paragraph 172 of the NPPF states that Local Planning Authorities should ensure that development does not hinder the creation and maintenance of a continuous signed and managed route around the coast, (as required by the Marine and Coastal Access Act 2009). The designation of Coastal Margin land enables spreading room for the coastal trail and aims to ensure the public enjoyment of this area by establishing new rights of access and to make the extent of people's access rights clearer and more cohesive on the ground.

This designation is primarily about access rather than development or planning policy, but needs to be referred to in the supporting text for any coastal policies.

### Coastal Partnership East Statement of Common Ground

5.31. The maritime authorities of Norfolk and Suffolk have worked together to prepare a Statement of Common Ground to ensure a joined up approach across areas that share the characteristics of an eroding coast. (See **Appendix A** for the Statement in full) The agreed aims are:

- **A holistic and "whole coast" approach** will be taken, recognising **coastal change** is an inevitable part of a dynamic coast. A naturally functioning coastline is desirable in principle, but may not be appropriate in every location.
- The signatory Authorities will consider the value of **aligning policy approaches**.
- To have regard to the well-being of **communities** affected by coastal change and minimise blight.
- To **protect** the coastal environment, including nature conservation designations and biodiversity.
- To work with local businesses and the wider economy to maximise productive use of properties and facilities for as long as they can be safely and practicably utilised to promote **investment, viability and vitality** of the area

- Adopt a balanced **risk-based approach** towards new development in Coastal Change Management Areas, in order to not increase risk, while at the same time to facilitating affected communities' adaption to coastal change.
- To promote **innovative approaches** such as techniques that enable anticipatory coastal adaptation, removal of affected structures and property roll-back or relocation.

## 6. Summary of Key Issues

- 6.1. Coastal change will continue to remain a key issue for North Norfolk with lowering beach levels and large stretches of the coast forecast to continue to erode, threatening properties and businesses, as well as beach access points and footpaths. The impact of this erosion has wider impacts on the affected coastal communities creating uncertainty, lack of investment and reduced property values. Even in areas where the SMP identifies a Hold the Line policy, there is no certainty of funding for coastal defence schemes. The nature of the district's beaches is likely to change in the longer term with consequent impacts on tourism, particularly in resorts with hard sea defences. Moreover, the SMP identifies major infrastructure, such as parts of the coast road at Trimingham and Walcott, sewage pumping station at Overstrand as well as caravan parks and properties potentially at risk by 2055. This would have major implications on the north-east of the district which will need to be addressed in due course.
- 6.2. However, there are considerable uncertainties regarding the rate of coastal change and particularly given the impact of defence schemes currently in preparation, which were not envisaged in the modelling work for the SMP. There will be a need for further monitoring to establish how far SMP forecasts are being fulfilled.
- 6.3. From a planning policy perspective, the local plan needs to address coastal issues in the following ways:
- The coast is central to the character and economy of the district and needs to be part of the vision, spatial portrait and overall development strategy;
  - There is a need for policy protection for the coast including nature conservation and landscape designations, to prevent inappropriate development and to recognise the Heritage Coast definition, the England Coast Path and coastal margins, to be covered in the Undeveloped Coast policy (current Core Strategy policy EN3);
  - Policies to cover address the coastal tourist economy, (current Core Strategy policy EC7);
  - Policies to restrict development in areas at risk from coastal erosion (Coastal Change Management Areas, CCMA) in order to prevent any increase of risk to life and property (current Core Strategy policy EN11);

- Policies to allow for coastal adaptation and maintaining coastal community and coastal tourism viability: roll-back and relocation policies (current Core Strategy policy EN12);
- There may be a need to consider specific policies for coastal frontages in the seaside resorts. These areas are not covered by the CCMA as they have a 'Hold the Line' SMP policy, but there are still issues relating to coastal management which may need to be addressed.

These policy areas are covered in more detail below, with a consideration of policy issues and options. Officers consider that there is merit in retaining two separate policies to cover Coastal Erosion and Coastal Adaptation.

## 7. Review of Existing Policies

### The Undeveloped Coast - Policy EN 3

- 7.1. The purpose of the policy is to protect the character of areas of undeveloped coast. It sets out that only development which requires a coastal location will be permitted and replacements for development threatened by coastal erosion. The designated area on the Policies Map covers a wide swathe of countryside generally over 1km inland from the coast. The Undeveloped Coast is a designation derived from the 1998 Local Plan (Policy 26), which recognised that the undeveloped coast is an important national and international resource and developments not requiring a coastal location should be directed elsewhere to protect the appearance and character of the area. The Core Strategy policy EN 3 similarly restricts development, but it does allow for community facilities, commercial, business and residential development that are considered important to the well-being of the coastal community where it replaces that which, is threatened by coastal erosion.
- 7.2. Given the importance of the coast to the district in terms of economic, social and environmental benefits, it would seem essential to continue with a protective policy approach. The publication of the Marine and Coastal Access Act 2009 and the East Marine Plan, as well as support from the NPPF to maintain the character of the undeveloped coast, would suggest a continuation of the existing policy is the preferred approach. Given the issue and proposed policy approach regarding coastal erosion, the second clause recognising the potential need for relocation of properties affected by coastal erosion is still required.

### Coastal Erosion: Coastal Change Management Areas - Policy EN 11

- 7.3. Key issues:
  - Defining the area at risk from coastal erosion (referred to as Coastal Change Management Areas (CCMAs) in the NPPF).
  - Option to include a 30m buffer on CCMAs: the NPPF requires that CCMAs are identified for areas likely to be affected by physical changes to the coast. The Core Strategy predated the NPPF and so the areas at risk are called Coastal Erosion Constraint Areas. These are defined by the SMP 100 year lines. The

SMP includes more refined detail in relation to the three epochs, (Present day (i.e. early 2000s) to 2025/2025-55/2055-2105), and may be considered in the context of a planning application, but there is no distinction in policy between the different epochs. Although the implementation of coastal management schemes, subsequent revisions to the SMP or other studies may amend the CCMA zones, at present the most reliable data remains the existing SMP and therefore those zones shown in the Core Strategy Policies Map.

- 7.4. The CCMA's do not cover the coastline in built up areas which have SMP "Hold the Line" policy designations. This means that planning applications which may be affected by changing beach level and conditions are not picked up for consultation by the coastal management team. There may be a case for ensuring that all applications on the coastal fringe are subject to an assessment of the long term impacts of coastal change. Examples might include the need to future proof development on the promenades so that they are able to withstand more extreme storm conditions. Although, in theory, this could have been picked up in the Strategic Policy SS4, which states that all development Policies be designed to "mitigate and adapt to future climate change", in practice a more specific development management policy is considered preferable.
- 7.5. Waveney District Council includes an additional 30m buffer to the CCMA boundary so that any application within the CCMA or the buffer is required to submit a Coastal Erosion Vulnerability Assessment (CEVA). This additional buffer provides an extra level of precaution, but given that the forecasts at 100 years already include an allowance for error of 95%, and it is at this level of uncertainty, that it may be considered that an additional buffer is not justified.

## CCMA Policy Issues

Issue	Advantages	Disadvantages
Include CCMA on Policies Map based on SMP <b>Recommended</b>	Allows for certainty and transparency. Best available information. Consistent with Core Strategy approach.	This information could become out of date as new evidence emerges.
Do not include CCMA on Policies Map and refer to most up to date data.	Allows for flexibility if applicants can evidence more up to date information.	Could be considered to allow for too room for interpretation and dispute.
Inclusion of a 30m buffer on the 100 year line for a requirement for CEVAs	This approach allows for a long-term view to be taken of developments close to the CCMA.	An additional 30m would include more properties affected by the CCMA. Given the uncertainty in the rate of erosion it can be regarded as overly prescriptive.
Include reference to applications not within the CCMA, but in a coastal	Allows for an assessment of all applications which although within a "Hold the	May be regarded as overly bureaucratic and another restrictive test on

location (Sheringham, Cromer, Overstrand, Mundesley and Bacton Gas Terminal) which must address the changing nature of the coast. <b>Recommended</b>	Line” designation in the SMP will still be subject to coastal change, including more storm conditions, higher water levels, etc. This is a precautionary approach which ensures that all development takes into account the changing coastline.	development.
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## Coastal Erosion Vulnerability Assessment (CEVA)

### 7.6. Key issues:

- Include the requirement for applicants to submit a Coastal Erosion Vulnerability Assessment (CEVA) as part of any application in the risk area.

Other coastal planning authorities include the need for any application within the CCMA to submit a risk assessment to take into account the potential impact upon the development of coastal erosion. This is comparable to a flood risk assessment which is required for all developments in flood risk areas. The level of detail is intended to be appropriate to the degree of risk, the scale and nature of the development. Waveney District Council has produced a Supplementary Planning Document (SPD) that sets out the requirements and specifies two levels of CEVA as shown in the matrix below. The assessment is considered by the Coastal Management Team who provides advice to the planning officer for the application.

	Modification of an existing development	Extension to existing development	Temporary buildings, caravans and uses of land	New non-residential development	New residential development
30m risk Zone	Level A (high level assessment)	Level A	Level A	Level B	Level B
Inside CCMA	Level A	Level B (detailed assessment)	Level B	Level B	Not permitted

## CEVA Policy Issues

Issue	Advantages	Disadvantages
Include a requirement to submit a CEVA for all development within the CCMA	Allows for a fuller assessment of the long term impacts of the development. Provides a mechanism to discuss future-proofing developments. Ensures the applicant is fully aware of the risks of coastal erosion.	Additional requirement for applicant. May be considered burdensome for smaller scale applications. Additional workload of planning and coastal teams.

<p>Include a requirement to submit a CEVA for all development (apart from householder applications) within the CCMA. <b>Recommended</b></p>	<p>Allows for a fuller assessment of the long term impacts of the development. Provides a mechanism to discuss future-proofing developments. Ensures the applicant is fully aware of the risks of coastal erosion.</p>	<p>Additional requirement for applicant. Additional workload of planning and coastal teams</p>
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## Appropriate Development/ Types of Development in the CCMA

### 7.7. Key issues:

- What development should be prohibited in CCMA's?
- What development may be appropriate in the CCMA in order to allow for long-term coastal adaptation (for example, temporary, flexible, easily relocated structures)?
- What should be the requirements for demolition of at risk buildings?

- 7.8. The current policy approach does not permit new development or the intensification of existing development or land uses in the Coastal Erosion Constraint Area, unless it can be demonstrated that there is no increased risk to life or significant increase risk to property. This approach is in accordance with the NPPF and the precautionary principle. This policy has been generally effective in preventing inappropriate development, but there are concerns that it gives the impression of a blanket ban and that the policy does not provide sufficient flexibility and is therefore overly restrictive. The impact of the SMP and the policy is seen by some as creating blight and preventing investment in affected coastal communities. Some authorities such as Swale have a more positively worded policy, stating the permission will be granted subject to a number of criteria and allows for temporary uses. While the current Core Strategy policy does not preclude such developments, (if it can be shown that they do not increase risk), a more positively worded policy may be regarded as less restrictive.
- 7.9. The policy also refers to development anywhere that increases coastal erosion as a result of change in surface water run-off will not be permitted. This continues to be required and has been used in examples such as at Overstrand to prevent the use of soak-aways. There may also be a need to cross-reference to this policy in a policy regarding Sustainable Drainage systems (currently EN10: Development and Flood Risk).
- 7.10. It is contrary to national policy (PPG paragraph: 073 Reference ID: 7-073-201403061) to permit proposals for new permanent residential development in the CCMA as this is likely to increase risk. Also it would not normally be a sound financial proposition as the property value would decrease over time. But it could be argued that social rented units may be able to be funded as this type of landlords sometimes work on depreciation of rented homes over a shorter period (say 60 years) and assume no value in the asset after that time. Clearly, such an approach would be a radical departure, and is perhaps unlikely to be taken up, but could be worth exploring if the site were in the 50-100 epoch zone. The council would need to consider if there is a case for permitting temporary residential rental units which would have the benefit of providing much needed affordable housing, increase the vitality of the community but

would not increase long-term risk to life or property. Such development would need to include a legal agreement to secure the long term management potentially including the eventual demolition and removal of the development. However, this approach is contrary to national policy and is unlikely to be a financially viable option for most developers. No site assessments have been undertaken to examine if there are locations where such social housing development would be consistent with other policies in the plan.

## Policy Issues for Development permitted in CCMA

Issue	Advantages	Disadvantages
Retain current approach regarding development in CCMA	Simple to understand and allows for development if applicant can show no increased risk.	Can be regarded as a blanket restriction which has a negative impact on coastal communities.
Provide more positively worded policy, particularly of temporary/time limited developments. <b>Recommended</b>	Regarded as more positive and may encourage more productive use of CMMA for more temporary uses. This could increase vitality of area with economic and social benefits.	A more complicated policy would require strong guidance and potentially an SPD to explain potential uses.
Include potential for social rented accommodation to be included in CCMA. Would act as a special type of exceptions policy.	Provision of more affordable housing. Maintains vitality of community. Could include agreement and funding for removal at end of life.	Contrary to national policy. Innovative and untested approach. Risk associated with residential development in CCMA. Not likely to be many locations where such a development would be appropriate within a selected settlement.

## Infrastructure and Coastal Management Schemes

### 7.11. Key issues:

- Only permit new coastal defence schemes that are consistent with SMPs;
- Particular policies related to essential infrastructure in the CCMA;
- Potential policies for relocation of infrastructure?

The SMP identifies a number of pieces of essential infrastructure which may be at risk in the longer term. Also, as the coast changes, there may be a need to provide new access points and other tourism related facilities to maximise access to the beaches. Further, the policy needs to address the landfall of off-shore wind turbine developments in the North Sea. In the future the authority is likely to receive planning applications for coastal management schemes as well as essential infrastructure and

other developments related to the coastal strip such as beach huts or public toilets. It is therefore important that the policy framework is provided for such development.

## Policy Issues

Issue	Advantages	Disadvantages
Provide policy framework for consideration of coastal management schemes. <b>Recommended</b>	Provides more protection, certainty and policy framework for schemes. Ensures any essential infrastructure development or coastal management scheme is considered in context of SMP policy.	May be considered unnecessary as it would be expected that such schemes would be in line with policy and are anyway subject to Coast Protection Approval.

## Adaptation: Relocation and Roll-back - Policy EN 12

### Relocation

#### 7.12. Key issues:

- The nature of the “roll-back” policy and where enabling development should be permitted;
- Should relocation be restricted to the immediate area, anywhere in the district, on allocations which include an element for roll-back, specific allocations for roll-back;
- Should the replacement allow for more than one dwelling?
- Does the replacement dwelling need to be a comparable size to the existing dwelling?

7.13. The Pathfinder projects have shown how using EN12 “roll-back” can operate, and have used the Core Strategy policies to enable change along the coast, including in Happisburgh and Trimmingham. However, these examples have not been without issues, including the uncertainty around funding, resource to support affected home owners and businesses and a general unwillingness by property owners to act until the risk is very immediate.

7.14. It can be argued that, despite the limited number of applications using the policy, the current policies (EN11 and EN12) have been effective in providing a mechanism to enable roll-back. The efficacy of the policy is that it adds value to the at-risk property (by giving the potential for an “exceptions” development in a location which would be unlikely to be approved otherwise). However, that additional value has, to date, not attracted much private sector interest. The lack of significant take up of these policies could be as a result of the lack of funding and resources by current owners of properties at risk of erosion. Alternatively, it could be that once the tranche of immediately at risk properties were removed, there have been few properties at imminent risk and so no urgency for owners to utilise the policy.

7.15. At present the current policy sets different timescales for commercial and residential development: property must be affected by erosion within 50 years for community,



commercial or business uses and 20 years for residential uses, of the date of the proposal. A shorter time frame than 20 years would not encourage long-term adaptation and a longer timeframe than 50 years would encourage potential misuse of the policy by property not yet at risk. However, there is no real justification for a different timescale for the two types of development and it is unlikely that businesses would wish to consider relocation more than 20 years in advance of the risk. Further, the wording relates to properties “forecast to be affected by erosion within 20 years”. If a business or community use can argue that their business is being affected by coastal erosion, even if they are not within 20 years of the property or part of the property being lost, then they could still apply for planning permission. Depending on the nature of the property in question, there is potential for the at risk property to continue in productive use for a limited period even after the new development is completed subject to a satisfactory legal agreement time-limiting the use and ensuring clearance of the site.

- 7.16. One aspect of the operation of this policy that may need review is the criteria for where the re-built can be re-located. The policy states that the relocated dwelling is permitted within or adjacent to a selected settlement and is beyond the Coastal Erosion Constraint Area shown on the Policies Map. This means that the development can be anywhere in the district (as long as it is adjacent to a selected settlement and meet other Core Strategy policy requirements), and is not therefore necessarily related to the settlement from which it is being replaced. This is at odds with the objective that the roll-back policy should continue to support the vitality of the affected coastal community. There may be an argument to suggest that development well related to the affected settlement is preferable.
- 7.17. There are a number of options as to where relocation could take place: it could be covered by a generic criteria based policy allowing development in the designated Countryside. Alternatively, to ensure the relocation supports the needs of the community from which it is lost, it could be restricted to either the parish or neighbouring parish, to within a 5 mile radius of the property at risk or another designated area.
- 7.18. Another approach would be to specifically allocate land for roll-back purposes. This could either be a specially identified allocation solely for the purposes of re-location or as an element of one of the allocated sites in the selected settlements. In the same way that allocations need to provide for affordable housing and self-build, the policy on allocations could require an element for re-location of properties affected by coastal erosion. This could apply to all allocations or only those in coastal settlements. However, use of roll-back development on an allocated site may not achieve the land value uplift of an exception policy, as the site would already have development value as an allocation.
- 7.19. Conversely, it could be argued that a criteria-based approach is rather piece meal and relies on individuals to take forward relocation schemes. As we have seen, there has currently been little interest in such schemes by the private sector, without the use of public sector subsidy to enable the development. The nature of this policy depends on the objectives trying to be achieved. For example, if the key objective is to try to ensure a long-term prosperous future for the affected coastal communities, then to permit relocation development at a considerable distance from that community does not seem beneficial to that community, although may increase the

area of search that the property owner can consider when using the roll-back policy. If the key aim to a “roll-back” of the community, the relocation should be closely related.

- 7.20. An option to address the problems of financial viability of re-location would be to permit the new site to include two dwellings as a replacement for the lost dwelling. This would be an unprecedented approach and may be considered to be encouraging development in unsustainable locations, but would seek to address the problem that the cost of relocation is prohibitive for owners of at risk properties. It is not likely to be economically viable for property owners of properties at risk which have little value, to pay for relocation with the need to purchase land and construct a new dwelling even if the land values are lower than land with policy presumption of residential use.
- 7.21. The continued use of the property at risk, until it is considered no longer safe to occupy could also render the development more financially viable. This is permitted under the current policy but has not been used to date. The removal of a requirement to build a new dwelling that is comparable in size to that which it is to replace would enable a higher value property to be built which could assist in the viability of the relocation, but adding value to the new property.

### Roll-back Policy Issues

Issue	Advantages	Disadvantages
Continue to have a rollback/relocation policy	Consistency with other coastal authorities and Core Strategy. Enables property owners to “move on” Provides a mechanism to support community vitality.	There has been limited up-take of the policy, so it may be
Have no policy permitting relocation		Does not enable properties at risk to address the problem of loss through coastal erosion. Does not provide support to coastal communities
Amend policy so that the all development is within 20 years (currently non-residential is 50 years) <b>Recommended</b>	More consistent with residential uses. In practice there is unlikely to be a need to relocate more than 20 years ahead of risk of being affected by coastal erosion.	
Amend the locational criteria of the re-location to only allow for development well related to the village from which the property is being lost.	More flexible approach. Would be better related to settlement affected by erosion.	More ambiguous and open to interpretation. Reduces the potential land available for relocation, thereby potentially reducing bargaining position of

		property owner in buying a site. Limited sites available.
Allow relocation <b>both</b> in or adjacent to selected settlements in the district <b>or</b> well related to the village from which the property is being lost. <b>Recommended</b>	Flexible approach and allows for choice of relocation sites, but still in accordance with the spatial strategy.	May not directly relate to coastal village from which property is lost.
Allocate specific sites for relocation or rollback.	Clarity about where relocation could take place.	Land value of allocated site may render such a re-location financially unviable. Sites may be considered unsustainable and not in accordance with the spatial strategy.
Include requirement for general allocations to have an element for re-location of properties affected by coastal erosion.	Clarity about where relocation could take place.	Not related to community from where the property is being lost. Land value of allocated site may render such a re-location financially unviable. May affect viability of main development and reduce affordable housing provision. Uncertainty regarding is such development would come forward may undermine allocation.
Remove the requirement for the replacement property to be comparable in size to that which it is to replace. <b>Recommended</b>	May allow for more value to be gained from the relocated property, making a scheme more financially viable. Other policy requirements would still ensure that the new development was in keeping with the character of the local area.	
Allow for a two for one policy, subject to a viability test.	Would make a relocation development a more financially viable option.	May be considered too permissive and encourage unsuitable levels of development in unsustainable locations. Viability assessment testing would be required.

## 8. Proposed Policy Approaches

- 8.1. In light of the above analysis, this section sets out the preferred options for policies addressing the coast. It is considered that it is preferable to retain two policies to cover the separate but related issues of the area at risk (the Coastal Change Management Area (CCMA)) and the policy to address relocation, as well as retaining a separate policy regarding the Undeveloped and Heritage Coast designations.

### The Undeveloped Coast

	Policy Option	Advantages	Disadvantages
1	Carry forward existing policy and constraint area with minor amendments and updates.	Protects special character of undeveloped coast area.	
2	Do not have an Undeveloped Coast designation.		No specific policy protection for the undeveloped coast.
<b>Recommendation</b> To retain the policy wording but add social and economic well-being to second clause.			

### Regulation 18 First Draft Local Plan version

#### Proposed Supporting Text: Heritage & Undeveloped Coast

**The purpose of this policy** is to protect the appearance and character of the coast.

Large parts of the North Norfolk coast are protected by the Norfolk Coast AONB, the Heritage Coast, Undeveloped Coast and nature conservation designations. Outside of the main settlements the whole of the coast has an undeveloped character and appeal, which is critical to North Norfolk's distinctiveness and tourism economy. Non-essential development in a coastal area can have cumulative effects on landscape, biodiversity and recreation. Government policy states that development that does not require a coastal location should not normally be provided within the coastal zone. The Heritage Coast and Undeveloped Coast designations are designed to minimise the wider impact of general development, additional transport and light pollution within the distinctive coastal area.

Part 9 of the Marine and Coastal Access Act 2009 ("the 2009 Act") aims to improve public access to, and enjoyment of, the English coastline by creating clear and consistent public rights along the English coast for open-air recreation on foot. It allows existing coastal access to be secured and improved and new access to be created in coastal places where it did not already exist. Development in a coastal location should take account of the England Coastal Path and Coastal Margin.

Policy SD12 'Coastal Adaptation' outlines the situations where development will be permitted in the Countryside where it re-locates that which is threatened by coastal erosion, and these exceptions will be allowed in the Undeveloped Coast.

## Policy ENV 3

### Heritage & Undeveloped Coast

In the Heritage and Undeveloped Coast only development that can be demonstrated to require a coastal location and that will not be significantly detrimental to the open coastal character will be permitted.

Community facilities, commercial, business and residential development that is considered important to the social and economic well-being of the coastal community will be permitted where it replaces that which is threatened by coastal erosion.

## Coastal Erosion

	Policy Option	Advantages	Disadvantages
1	Carry forward existing policy and constraint area with minor amendments and updates to reflect NPPF terminology. (re-name Coastal Erosion Constraint Area to Coastal Change Management Area)	In line with national policy.	Does not address issue of perceived blight to coastal communities
2	Have a more positively worded policy which allows for development subject to a submitted Coastal Erosion Vulnerability Assessment (CEVA) to assess risk. Include policy framework to consider essential infrastructure and coastal management schemes	More positive approach to risk area to allow for development which may have a social or economic benefit to the affected coastal community. Ensures all types of development in the area are considered. CEVA will ensure applicant is fully aware of risks of coastal change and addresses this in the application.	May be regarded as too permissive in an area where development should be restricted.  A CEVA may be perceived as an onerous additional requirement for a planning application.
3	Include consideration of coastal change on development which may be affected but is outside the CCMA.	Ensures new development is future-proofed for impact of coastal change.	May be regarded as unnecessarily onerous.

### Recommendation: Options 2 & 3

To change the policy wording to reflect national policy, including renaming of Coastal Erosion Risk Area to Coastal Change Management Area;

To take forward a more positively worded policy to allow for temporary permissions within the CCMA; and, to require a risk assessment (CEVA) for all development within the CCMA.

## Regulation 18 First Draft Local Plan version

### Proposed Supporting Text: Coastal Erosion

**The purpose of this policy** is to reduce the risk from coastal change by managing the types of development which will be supported in potential risk areas.

North Norfolk's coast is in places low-lying and in others it is characterised by cliffs comprising soft silts, clays, sand and gravel and other material that is susceptible to erosion. Erosion has taken place over thousands of years and these natural processes will continue to affect the coastline. Hard defences protect the settlements of Sheringham, Cromer, Overstrand, Mundesley and large sections between Happisburgh and Winterton Ness.

The Framework states that Local Plans should reduce the risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast. It states that Plans should identify Coastal Change Management Areas (CCMA) which cover areas likely to be affected by physical changes to the coast. The National Planning Practice Guidance (NPPG) states that a Coastal Change Management Area should be defined where change is likely to be significant over the next 100 years. The NPPG states that Shoreline Management Plans should be taken into account. The Framework states that Plans should be clear as to what development will be appropriate in the Coastal Change Management Areas and in what circumstances. The National Planning Practice Guidance states that permanent residential development will not be appropriate within a Coastal Change Management Area but that some commercial and community development may be appropriate within the area depending on the level of risk and the sustainability of the proposals.

The Marine and Coastal Access Act (2009) sets out provisions for the creation of a continuous, signed and managed path around the entire English coast including provision of a coastal margin. The National Planning Policy Framework states that development should not hinder this objective. Currently the section of the coast from Horsey to Weybourne has been designated, with the western section of the District beyond Weybourne to Holkham, under consideration at the time of writing.

Shoreline Management Plans (SMPs) set out how the coastline should be managed. They determine appropriate, strategic policies for coastal management that balance the many and often competing aspirations of stakeholders with proper regard for economic and environmental sustainability. They include policy statements for discrete lengths of coast with shared attributes, broken down into short, medium and long-term time bands. There are two SMPs covering the North Norfolk coast, SMP5: North Norfolk and SMP6: Kelling Hard to Lowestoft Ness (adopted 2012). The SMPs identify a high level 100 year strategy for each section of the coast, divided in the three time bands. The aim of the strategy is move towards a more naturally functioning coast and to allow for cliff erosion so that this sediment supports beach levels. Since the adoption of the SMP, a number of studies have been undertaken to better understand these natural processes and schemes are being taken forward to extend the life of existing hard defences such as at Mundesley. An innovative sandscaping scheme was completed in September 2019, which protects the local communities of Bacton and Walcott and critical infrastructure at the Bacton Gas Terminal site from the North Sea. This bold new approach is expected to offer 15-20 years of protection from coastal erosion and the effects of climate change to this stretch of North Norfolk's coastline.

At this time the SMP evidence remains the best available information on the likely future coastal erosion and should be used as a basis for assessment of properties at risk, unless an applicant, through a Coastal Erosion Vulnerability Assessment (CEVA) provides more up to date, robust, site-specific information. However, it should be noted that the relevant SMPs will be updated during the lifetime of the Local Plan. The Coastal Change Management Area (CCMA) will be defined in the Local Plan as those areas assessed in the Shoreline Management Plan as potentially at risk over a 100 year period.

All planning applications for development within the CCMA must be accompanied by a CEVA and take into account the potential impact upon the development of retreat of the shoreline. The vulnerability assessment should be appropriate to the degree of risk and the scale, nature and location of the development. It should demonstrate that new development provides wider sustainability benefits that outweigh the predicted coastal change impact; will be safe through its planned lifetime, without increasing risk to life or property, or requiring new or improved coastal defences; does not affect the natural balance and stability of the coastline or exacerbate the rate of change and should consider and identify measures for managing the development at the end of its planned life. The assessment will also need to demonstrate that the proposed development will not increase the risk of erosion (e.g. from surface water run-off).

These affected coastal communities have already experienced blight in the form of reduced property values and investment and there is recognition of the need for a more flexible approach to coastal management which allows for natural processes while at the same time enables coastal communities to be sustainable, economically viable and maintain attractiveness to visitors.

SMPs provide a strategic approach to the management of the coast. As such, proposals for new coastal management works or other essential infrastructure should be in accordance with the management policies identified in the SMPs. Where there is a need and or a desire to develop a coastal management scheme that is contrary to the current Shoreline Management Plan this should be dealt with through a review of the SMP prior to a planning application being considered.

New development or intensification of new development in a coastal location, but outside the CCMA, such as the promenade frontages of Cromer, Mundesley and Sheringham, also needs to consider the impacts of coastal change. Although these areas are protected by hard defences, the changing sea levels and increased extreme weather events, as a result of climate change, will impact on these areas and consideration needs to be given to future-proofing such developments so that they are designed to withstand likely future conditions.

## **Policy SD 11**

### **Coastal Erosion**

Within the **Coastal Change Management Area**, as defined on the Policies Map, proposals for new residential development, including conversion of existing buildings, will not be permitted. For other uses, planning permission will be granted for development proposals subject to:

1. It being demonstrated through a **Coastal Erosion Vulnerability Assessment**, that the

- proposal will not result in an increased risk to life, or a significantly increased risk to property; or,
2. the works are consistent with the relevant Shoreline Management Plan and there will be no material adverse impact on the environment or elsewhere along coast; and,
  3. the proposal comprises essential infrastructure including coast protection schemes; or,
  4. proposals for temporary permission, directly related to the coast, of a temporary or impermanent nature together with, as appropriate, a legal agreement to secure the long term management potentially including the eventual demolition and removal of the development; or
  5. proposals are for providing commercial, leisure or community infrastructure which provides substantial economic, social and environmental benefits to the community.

In any location, development proposals that are likely to increase coastal erosion as a result of changes in surface water run-off will not be permitted.

New development, or the intensification of existing development in a coastal location, but outside the Coastal Change Management Area, will need to demonstrate that the long-term implications of coastal change on the development have been addressed.

## Coastal Adaptation

	Policy	Advantages	Disadvantages
1	Retain current policy approach with updates as required.	Consistency of approach	Relocation may not benefit affected community. Number of potential sites to relocate will be reduced as there are fewer selected settlements in the proposed local plan.
2	Develop a policy more focused on coastal adaptation and roll-back of affected communities so that relocation is permitted only on sites well-related to the settlement from which the property is moving to allow communities to "roll-back".	Better addresses the issues identified through the pathfinder and will subsequent planning applications. Benefits the affected community more directly.	May be regarded as encouraging residential development in unsustainable locations.
3	As option 2 but include sites in and adjacent to selected settlements as well, as a less preferred option, to allow for a wider site search.	Allows for a wider area of search for relocating properties if available sites well-related to the coastal community cannot be found.	May be regarded as encouraging residential development in unsustainable locations.
4	Include an element for relocated properties affected by coastal erosion in all or specified housing allocations. (Wording would be in allocation policies).	Provides sites for relocating properties.	May affect the certainty and viability of allocated sites. Mechanism for take up of plots difficult to control.



5	Identify specific allocations for roll-back within affected coastal communities.	Could provide certainty for properties that need to relocate.	May be difficult to identify sites. May increase land value through allocation which would render relocation financially unviable.
6	Where viability testing shows it is required include additional dwelling on new site.	Could provide a mechanism to ensure that relocation can take place.	May be regarded as encouraging residential development in unsustainable locations. May be regarded as providing inappropriate benefit to individuals.
<p><b>Recommendation: Option 3</b> To change the policy to be more focused on coastal adaptation and roll-back of affected communities so that relocation is permitted not only on sites well-related to the settlement from which the property is moving, but also to allow for development adjacent to selected settlements to allow for a wider site search.</p>			

## Regulation 18 First Draft Local Plan version

### Proposed Supporting Text: Coastal Adaptation

**The purpose of this policy** is to make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas.

The stretch of the coast from Kelling Hard to Cart Gap, Happisburgh consists of soft glacial cliffs and sandy beaches and has been subject to coastal erosion for thousands of years. The Kelling Hard to Lowestoft Shoreline Management Plan identifies areas and properties at risk from coastal erosion. The area at risk, a Coastal Change Management Area, is identified in **Policy SD11 'Coastal Adaptation'** and on the Policies Map.

The National Planning Policy Framework states that Local Plans should make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas. The National 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 can be achieved. **Policy SD12 'Coastal Adaptation'** allows for the relocation of residential, community, agricultural and commercial properties that are within the Coastal Change Management Area to areas inland defined as the Countryside where development is normally restricted.

In view of the likely effects of coastal erosion on coastal communities and the local economy of those areas at risk it is considered important to enable adaptation to take place in advance of the actual loss of property. Allowing replacement development to take place in the Countryside policy area is intended to assist in minimising the blighting effects resulting

from CCMA and enable communities to “roll-back” in order to help secure the long-term future sustainability of coastal areas.

In order to be eligible, residential properties must be at risk from erosion within a 50 year period. This enables property owners to take a pro-active decision to relocate to an alternative location well before erosion becomes an imminent threat. In order to maintain the sustainability of coastal settlements, relocation should take place close to the existing community.

Temporary uses for the affected properties, in advance of their loss, are to safeguard the economic and social well-being of the settlements affected and secure environmental gains. The future use of such sites or buildings should be secured (by legal agreement) in perpetuity and in relation to vacated dwellings interim uses will be considered beneficial to the well-being of the local community, however, the occupancy will be time-limited to minimise risk.

## **Policy SD 12**

### **Coastal Adaptation**

Proposals for the relocation and replacement of community facilities, infrastructure commercial, agricultural and business uses affected by coastal erosion will be permitted in the Countryside, provided that:

1. the proposed development replaces that which is in the **Coastal Change Management Area** and is forecast to be affected by erosion within 20 years of the date of the proposal;
2. the new development is beyond the Coastal Change Management Area shown on the Policies Map and is in a location that is well related and accessible to the coastal community from which it was displaced;
3. the site of the development / use it replaces is either cleared and the site rendered safe and managed for the benefit of the local environment, or put to a temporary use that is beneficial to the well-being of the local community, as appropriate; and
4. taken overall (considering both the new development and that which is being replaced) the proposal should result in no detrimental impact upon the landscape, townscape or biodiversity of the area, having regard to any special designations.

Proposals for the relocation and replacement of dwellings affected by erosion will be permitted, provided that:

1. the development replaces a permanent dwelling (with unrestricted occupancy), which is within the CCMA and is affected by erosion within 20 years of the date of the proposal; and,
2. the new dwelling(s) is used as a primary residence;
3. the new development is beyond the Coastal Change Management Area shown on the Policies Map and is in a location that is well related to the coastal community from which it was displaced and;
  - a. adjoins an existing group of dwellings;
  - b. the development does not result in an isolated form of development;
  - c. the development is in proportion to and respects the character, form and appearance of the immediate vicinity and surrounding area; and
  - d. is consistent with other policies in the Local Plan.

If such a site is not available, the relocated development is within or adjacent to a **Selected Settlement**; and

1. the site of the dwelling it replaces is either cleared, and the site rendered safe and managed for the benefit of the local environment, or put to a temporary use that is beneficial to the well-being of the local community, as appropriate. The future use of the site should be secured (by legal agreement) in perpetuity. Interim use as affordable housing will be considered beneficial to the well-being of the local community in interpreting this clause; and
2. taken overall (considering both the new development and that which is being replaced) the proposal should result in no detrimental impact upon the landscape, townscape or biodiversity of the area, having regard to any special designations.

## 9. Summary of Feedback from Regulation 18 Consultation

9.1. The full Regulation 18 consultation feedback for the three draft policies is contained in Appendix 3. Overall, the number of responses to the policies was limited. However, the respondents did raise some key issues. The comments are summarised below for each draft policy:

### Policy ENV 3: Heritage & Undeveloped Coast

- **Individuals:** Three responses in support and one objecting were received for the draft policy. Overall, the policy was considered to be a much-needed policy for North Norfolk, as protection should be given to important areas of wildlife habitat and biodiversity. The comments requested that the Undeveloped Coast on Proposals Map needing to be updated to exclude existing settlements and further consideration of the policy wording.
- **Parish and Town Councils:** One response from Bacton & Edingthorpe Parish Council strongly supporting the draft policy and referring to the area's links to the nearby Norfolk Coast AONB and to the Bacton Gas Terminal.
- **Statutory Bodies and Organisations:** Two general comments and two supportive responses, broadly supporting the policy, but one respondent commented that the approach was unduly restrictive given the overlap with the AONB, which is a national statutory designation reinforced by Local Plan policy that provides an adequate safeguard.

### Policy SD 11: Coastal Erosion

- **Individuals:** Two objections and one general comment were received. Mainly commenting that villages and towns on the coast should be protected from the risk of coastal erosion and flooding in order to maintain existing communities, encourage tourism and protect agricultural land and wildlife and that new homes should not be built in areas at risk of coastal erosion.
- **Parish and Town Councils:** no comments were received.

- **Statutory Bodies and Organisations:** One objection on behalf of a Company that operates a caravan park within the CCMA, whose main concerns are that the policy would be overly restrictive and limit opportunities for the staged 'roll back' or possible relocation of existing tourist related businesses within the CCMA. Stating that the relocation from the most vulnerable areas of the CCMA to the less vulnerable areas in the CCMA would be more feasible, viable and deliverable than a complete move outside of the CCMA. They comment about the difficulties of a finding alternative sites and that most attractive sites are likely to be within the AONB/Undeveloped Coast where other restrictive policies would apply.
- In addition, two general comments and one response in support were received. Natural England commented that the Plan should consider the marine environment and apply an Integrated Coastal Zone Management approach. Where Marine Plans are in place, Local Plans should also take these into account. The RSPB commented that any assessments regarding coastal change must consider wider issues, such as, changes to sediment inputs offshore, especially with a changing climate and weather patterns. The Norfolk Coast Partnership requested that geology be mentioned in the policy and that there is a need to involve the Norfolk Geodiversity Partnership in applications and projects.

## Policy SD 12: Coastal Adaptation

- **Individuals:** One response supports the policy but suggests that coastal adaptation should be for local occupiers and shouldn't allow second home owners to relocate.
- **Parish and Town Councils:** One general comment from Sheringham Town Council concerned that if holiday homes and second homes are not included in the rollback, it could lead to increased pressure on an already stretched housing supply. One objection was received from Bacton and Edingthorpe Parish Council, concerned that the relocation of cliff-top caravan parks to sites within the undeveloped coast could be harmful to the landscape and that the provision for the safeguarding of the landscape is essential within the policies. Such development could encroach into the local countryside and conflict with Policy SD4 (Development in the Countryside). The Parish Council comments that the designation of Bacton as a Small Growth Village could potentially limit the future availability of suitable sites for relocation of facilities threatened by coastal erosion.
- **Statutory Bodies and Organisations:** One objection on behalf of a Company that operates a caravan park within the CCMA, whose main concerns are that the Policy is too restrictive in that it would only allow for the relocation of proposals from the CCMA that would be affected by coastal erosion in the next 20 years, from date of proposal, which may not be the most economically viable or feasible approach for certain uses. It is suggested that this time limit requirement should be deleted, or extended. They comment that the Policy includes additional onerous requirements that will need to be met in order for a 'roll back' proposal to be supported and that

the wording should refer to 'no net detrimental impact' and that the Policy's requirements should be balanced with the viability of relocation.

- Two general comments and one of support were received. Natural England welcomes the policy, commenting that shoreline adaptation should be considered on a strategic scale where possible. The Norfolk Coast Partnership supports the policy, in not being detrimental to the landscape. The Environment Agency have some concerns that the policy is impracticable and unfeasible for a number of commercial and business uses. Commenting that some Local Authorities (LA) are considering offering 2 for 1 property rollback opportunities to try to offset the high cost of relocation and encourage uptake of rollback opportunities. They also recommend inclusion of 'or, that the relocated dwelling should be in a location which exhibits a similar or improved level of sustainability', or similar, as relocation close to an existing community is often difficult for various reasons. Therefore, extending this principle elsewhere within the district, if local land is unavailable or purchase not feasible, should encourage rollback and early adaptation for the benefit of the wider areas.

## 10. Conclusions & Proposed Revisions to Policies for Regulation 19 Stage

### Policy ENV 3: Heritage & Undeveloped Coast

- 10.1 As set out in Chapter 9, the consultation comments are broadly supportive, with one comment referring to the overlap of the two designated areas with that of the AONB, which provides a nationally designated approach to protection. It is useful to note that this draft policy is largely a continuation of the existing Core Strategy Policy EN 3.
- 10.2 No major amendments are proposed to Policy ENV 3 as a result of the consultation feedback. However, minor amendments to the policy wording are made to provide greater clarity, which are highlighted in red text and where previous wording is struck through. The policy remains numbered as Policy ENV 3 in the Regulation 19 submission version of the Local Plan.

#### Policy ENV 3

##### Heritage & Undeveloped Coast

1. In the **designated Heritage Coast and Undeveloped Coast, as defined on the Policies Map**, ~~only~~ development **will only be permitted where it** ~~that~~ can be demonstrated to require a coastal location and ~~that~~ **which** will not be significantly detrimental to the open coastal character ~~will be permitted~~.
2. Community facilities, commercial, business and residential development that is considered important to the social and economic well-being of the coastal community will be permitted where it replaces that which is threatened by coastal erosion.

## Policy SD 11: Coastal Erosion - renamed Policy CC5: Coastal Change Management at Regulation 19 stage

- 10.3. In response to the consultation comments set out in Chapter 9, it should be highlighted that it is the SMP's that set out, at a strategic level, how the coastline is managed. The policy for coastal defence is contained in the SMP's and the funding for the development and maintenance of defence structures comes from Central Government. North Norfolk DC is the 'Coast Protection Authority' for this area, with the power to undertake coast protection works and to determine third party applications for such works. North Norfolk DC also has a broader responsibility for ensuring that the interests of the public and of our coastal communities is safeguarded in the face of coastal change. Secondly, it should be noted that Policy CC5 is similar to the existing Core Strategy Policy EN11.
- 10.4. It is considered that the comprehensive approach consulted on at the Regulation 18 stage provides a flexible approach to development within the CCMA when responding to coastal change, particularly given the critical need to respond to climate change. Policy CC5 allows for the provision of essential and time limited coastal development within the CCMA, where it is demonstrated through a Coastal Erosion Vulnerability Assessment (CEVA), as required by the NPPF, that a proposal would not result in an increased risk to life or property and which is consistent with the relevant SMP. The details required in a CEVA will be proportionate to the degree of risk and the scale, nature and location of the development. Going forward, it is intended to include detailed guidance and potentially templates for different levels of CEVA as part of the joint Coastal Adaptation SPD.
- 10.5. The policy has also been produced having regard to the Statement of Common Ground on Coastal Zone Planning between the Borough Council of King's Lynn & West Norfolk, North Norfolk District Council, Great Yarmouth Borough Council, East Suffolk Council and the Broads Authority, the area covered by Coastal Partnership East (with the exception of Kings Lynn and West Norfolk). The Statement of Common Ground includes a set of agreements which include alignment of planning policies for the coast. Policy CC5 is consistent with the approaches set out in adopted and emerging Local Plans across the Norfolk and Suffolk Coast and of ensuring policies for managing the coast are 'strategic'.
- 10.6. In line with national policy and guidance, no new permanent dwellings would be permitted within the CCMA. This would include the potential conversion of buildings to permanent dwellings. A footnote has been added to the Policy to confirm that this would not exclude changes of use afforded as permitted development rights within the Town and Country (General Permitted Development) (England) Order 2015 (as amended). However, such prior approval proposals would still be required to meet the criteria set out within the Order, which include flood risk.
- 10.7. Reference to groundwater is proposed to be included in the part of the policy relating to any proposals that are likely to cause increases in coastal erosion that would not be permitted. This is included as development may adversely affect cliff stability by virtue of the effects on groundwater.
- 10.8. It is concluded that no major alterations to the draft policy are proposed, but that some minor amendments, to either omit or include wording to reflect the current terminology, be incorporated in the next iteration of the policy. This also includes additional clarification, in line with NPPF paragraph 172, to ensure that development

does not hinder the creation and maintenance of any coastal infrastructure, including coastal paths and roads. The amendments are shown with additions in red text and previous wording struck through.

## Policy CC 5

### Coastal ~~Erosion~~ Change Management

1. Within the **Coastal Change Management Area**, as defined on the Policies Map, proposals for new **permanent** residential development, including conversion of existing buildings **(1)**, will not be permitted.
2. For other ~~uses~~ **development proposals within the Coastal Change Management Area** planning permission will be granted ~~for development proposals~~ subject to:
  - a) ~~It being demonstrated~~ through a **Coastal Erosion Vulnerability Assessment**, that the proposal will not result in an increased risk to life or a ~~significantly increased risk~~ to property; ~~or~~ **and**,
  - b) the works are consistent with the relevant Shoreline Management Plan and **it is demonstrated that** there will be no adverse impact on the environment or elsewhere along ~~the~~ coast; and,
  - c) the proposal comprises essential infrastructure including coast protection schemes; or,
  - d) proposals for temporary ~~permission~~ **time-limited development** directly related to the coast, together with ~~as appropriate~~ **planning conditions or** a legal agreement to secure the long term management potentially including the eventual demolition and removal of the development; or
  - e) proposals are for providing commercial, leisure or community infrastructure which provides substantial economic, social and environmental benefits to the community.
3. In any location, development proposals that are likely to increase coastal erosion as a result of changes in **groundwater and** surface water run-off will not be permitted. **Any development proposals shall not hinder the creation and maintenance of any coastal infrastructure.**
4. New development, or the intensification of existing development in a coastal location **that is within Hold the Line zones, as defined on the Policies Map**, but outside the Coastal Change Management Area, will need to demonstrate that the long-term implications of coastal change on the development have been addressed **in a supporting Coastal Erosion Vulnerability Assessment.**

**(1) Excluding permitted development rights contained within the Town & Country Planning (General Permitted Development) (England) Order 2015 (as amended)**

## Policy SD 12: Coastal Adaptation renamed as Policy CC6: Coastal Change Adaptation at Regulation 19 stage

- 10.9 The comprehensive policy approach for Policy CC6 resulted in the consultation feedback set out in Chapter 9. The key issues largely relate to the specific details of the rollback being too restrictive. Some of the respondents comment that the requirements of the draft policy would make relocation unviable and undeliverable, for a number of reasons.
- 10.10 It is noted that there has been a lack of significant take up of in terms of the current Core Strategy Policy EN12, which could be as a result of the lack of funding and resources by current owners of properties at risk of erosion. Alternatively, it could be that once the tranche of immediately at risk properties have been removed, there were few properties at imminent risk and so no urgency for owners to utilise the policy. The overarching aim of the draft policy is to achieve the well planned roll-back of affected communities and businesses, in order that relocation can preferably be permitted on sites well-related to the settlement from which they are moving (to retain the cohesiveness of the community), but the policy would also allow for the eventuality of a wider search for sites adjacent to Selected Settlements (as defined in Policy SD3). Going forward, the efficacy of the draft policy would be to add value to the at-risk properties, for example, by not requiring the replacement to be on a like for like basis, as is the case within the current Policy EN12.
- 10.11 It is considered that a longer term view should be adopted. As such, the proposed timeframes in which properties and business premises can be considered for relocation and rollback would both be lengthened from at risk of erosion of 20 years to 50 years from the date of the proposal. The main implication of this change is that it will allow forward planning by more properties and businesses, which also reflects the unpredictable and accelerating climate changes.
- 10.12 For clarity, it is considered appropriate to refer to there being ‘no **net** detrimental impact upon the landscape, townscape or biodiversity of the area, having regard to any special designations’ for all development types’ within the policy wording.
- 10.13 It is concluded that the policy is amended as set out below, where additions are highlighted in red text and omissions are struck through. As such, Policy CC6 aligns with the aims of national policy and guidance, the Statement of Common Ground and broadly reflects the approaches set out in the adopted Local Plans across the Norfolk and Suffolk Coast.

### ~~Policy SD 12~~ **CC 6**

#### ~~Coastal Adaptation~~ **Change Adaptation**

1. Proposals for the relocation and replacement of community facilities, infrastructure commercial, agricultural and business uses affected by coastal erosion will be permitted in the **Countryside Policy Area**, provided that:
  - a) the proposed development replaces that which is in the **Coastal Change Management Area** **as defined on the Policies Map** and is forecast to be affected by erosion within 50 years of the date of the proposal;
  - b) the new development is beyond the **Coastal Change Management Area** ~~shown on~~



- ~~the Policies Map~~ and is in a location that is well related and accessible to the coastal community from which it was displaced;
- c) the site of the development / use it replaces is either cleared and the site rendered safe and managed for the benefit of the local environment, or put to a temporary use that is beneficial to the well-being of the local community, as appropriate; and
  - d) taken overall (considering both the new development and that which is being replaced) the proposal should result in no **net** detrimental impact upon the landscape, townscape or biodiversity of the area, having regard to any special designations.
2. Proposals for the relocation and replacement of dwellings affected by erosion will be permitted, provided that:
- a) the development replaces a permanent dwelling (with unrestricted occupancy), which is within the **Coastal Change Management Area** and is forecast to be at risk from erosion within ~~20~~ **50** years of the date of the proposal; and
  - b) the new dwelling(s) is used as a primary residence;
  - c) the new development is beyond the **Coastal Change Management Area** ~~shown on the Policies Map~~ and is in a location that is well related to the coastal community from which it was displaced; and:
    - i. adjoins an existing group of dwellings;
    - ii. the development does not result in an isolated form of development;
    - iii. the development is in proportion to and respects the character, form and appearance of the immediate vicinity and surrounding area; and,
    - iv. is consistent with other policies in the Local Plan.
3. If such a site is not available, the relocated development is within or adjacent to a **Selected Settlement**; and
- a) the site of the dwelling it replaces is either cleared, and the site rendered safe and managed for the benefit of the local environment, or put to a temporary use that is beneficial to the well-being of the local community, as appropriate. The future use of the site should be secured (by legal agreement) in perpetuity. Interim use as affordable housing will be considered beneficial to the well-being of the local community in interpreting this clause; and
  - b) taken overall (considering both the new development and that which is being replaced) the proposal should result in no **net** detrimental impact upon the landscape, townscape or biodiversity of the area, having regard to any special designations.

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# Appendix 1: Norfolk and Suffolk Coastal Authorities Coastal Zone Planning Statement of Common Ground

## Norfolk and Suffolk Coastal Authorities Statement of Common Ground Coastal Zone Planning

This statement of common ground is between:

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

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

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

### Background

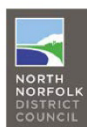
The risk of coastal flooding and vulnerability to erosion along the coast does not respect local planning authority boundaries, and therefore coastal change needs to be considered across a wide geography. There are significant potential benefits to joint working across administrative and professional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

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

The National Planning Policy Framework (NPPF) states that in coastal areas, local planning authorities should apply Integrated Coastal Zone Management (ICZM) across Local Authority and land/sea boundaries, ensuring integration of the terrestrial and marine planning regimes.

ICZM is a process which requires the adoption of a joined-up and participative approach towards the planning and management of the many different elements in coastal areas (land and marine). The recognised key principles which should guide all partners in implementing an integrated approach to the management of coastal areas are:

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



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

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

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

### Shared Aims

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

### Agreed Approach

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

- a) Implement the principles of Integrated Coastal Zone Management;
- b) Develop shared **understanding** of coastal processes and the development planning implications of these;
- c) Share experience, **best practice** (including planning policies) and ideas for innovation;
- d) Use the adopted **Shoreline Management Plans** as a basis for development planning, recognising that defined areas may change in future and giving appropriate regard to emerging replacement Shoreline Management Plans, updated predictions of the impact of climate change or other relevant evidence;
- e) Acknowledge the importance of **coastal communities and their economies**, and foster their resilience, innovation and vitality;
- f) Recognise the need to **relocate or protect infrastructure** likely to be adversely affected by coastal change;
- g) Note the need for strategic policies on coastal change, in order to guide **neighbourhood planning**.
- h) Encourage development which is consistent with anticipated coastal change and its management, and facilitates **adaptation** by affected communities and industries.



- i) Consider adopting policies to facilitate **rollback and/or relocation**, potentially including local plan site allocations or facilitating 'enabling' development;
- j) Consider adopting policies which require the use of **risk assessments** to demonstrate that a development on the coast will be safe for its planned lifetime, without increasing risk to life or property, or requiring new or improved coastal defences; and
- k) Consider adopting policies that seek to ensure that new or replacement **coast protection schemes** are consistent with the relevant Shoreline Management Plan and minimise adverse impact on the environment or elsewhere on the coast.

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



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



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



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



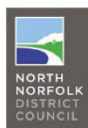
Cllr. Susan Arnold  
Cabinet member for Planning  
North Norfolk District Council



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



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

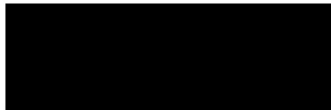




Cllr. Andy Smith  
 Cabinet member for Coastal Management  
 Suffolk Coastal District Council



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



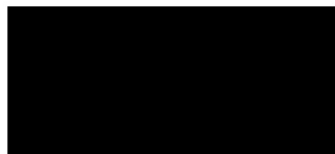
Cllr. David Ritchie  
 Cabinet member for Planning and Coastal Management  
 Waveney District Council



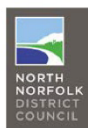
Melanie Vigo di Gallidoro  
 Chairman, Planning Committee  
 Broads Authority



Haydn Thirtle  
 Chair, Broads Authority



Endorsed by the Environment Agency  
 Mark Johnson, Regional Coastal Manager



## Appendix 2: Shoreline Management Plan Summary

### Key Infrastructure at Risk from Coastal Erosion

SMP6							
Policy					Property and Land-use		
Policy Unit	Name	From Present	Medium Term	Long Term	From Present	Medium Term	Long Term
		To 2025	2025-2055	2055-2105	To 2025	2025-2055	2055-2105
6.01	Kelling to Sheringham	No Active Intervention	No Active Intervention	No Active Intervention	Loss of no houses. Loss of agricultural land. Loss of the coastal strip of Sheringham Golf Links.	Loss of less than 5 houses. Further loss of agricultural land. Further loss of Sheringham Golf Links.	Cumulative loss of less than 5 houses. Further loss of agricultural land. Further loss of Sheringham Golf Links.
6.02	Sheringham	Hold the Line	Hold the Line	Hold the Line	No loss of property or land behind the existing defences.	No loss of property or land behind the existing defences.	No loss of property or land behind the existing defences. Properties along the promenade may become more exposed and subject to overtopping and storm damage.
6.03	Sheringham to Cromer	Managed Realignment	No Active Intervention	No Active Intervention	Loss of seafront land, but not properties. Some loss of caravan park land. Loss of Grade 3 agricultural land.	Loss of less than 5 commercial properties in East Runton and associated services. Further loss of caravan park land. Further loss of Grade 3 agricultural land.	Cumulative loss of less than 10 houses and 10 commercial properties and associated services. Further loss of caravan park land. Cumulative loss of up to approximately 45 hectares of Grade 3 agricultural land.
6.04	Cromer	Hold the Line	Hold the Line	Hold the Line	No loss of property or land behind the existing defences.	No loss of property or land behind the existing defences. Properties along the promenade may become more exposed and subject to overtopping and storm damage.	No loss of property or land behind the existing defences. Properties along the promenade may become more exposed and subject to overtopping and storm damage.
6.05	Cromer to Overstrand	No Active Intervention	No Active Intervention	No Active Intervention	Continued loss of coastal strip of golf course.	Further loss of golf course.	Further loss of golf course. Loss of less than 5 commercial properties.
6.06	Overstrand	Hold the Line	Managed Realignment	Managed Realignment	Loss of less than 5 properties along the south of Overstrand, but also loss of gardens due to natural cliff failure behind defences.	Cumulative loss of between 20 and 60 houses and less than 10 commercial properties and associated infrastructure/ services. Loss of local road links. Loss of sewage pumping station.	Cumulative loss of between 60 and 135 houses and less than 10 commercial properties and associated infrastructure/ services. Loss of local road links. Loss of sewage pumping station.

6.07	Overstrand to Mundesley	Managed Realignment	No Active Intervention	No Active Intervention	Loss of less than 10 residential and commercial properties. Loss of local roads. Loss of Grade 3 agricultural land. Loss of caravan park land.	Cumulative loss of between 10 and 30 properties (commercial and residential) in Trimmingham and Sidestrand. Loss of section of main coast road linking Trimmingham to adjacent towns and villages. Further loss of Grade 3 agricultural land. Loss of caravan parks.	Cumulative loss of between circa 30 and 90 residential properties and circa 10 to 15 commercial properties. Potential loss of MOD facility (but could be relocated) Further loss of main road linking Trimmingham to adjacent towns and villages. Total loss of up to approximately 85 hectares of Grade 3 agricultural land. Loss of caravan parks.
6.08	Mundesley	Hold the Line	Hold the Line	Managed Realignment	No loss of property or land behind the existing defences at Mundesley. Loss of less than 5 properties along the Cliftonville frontage.	No further loss of property or land behind the defences.	Cumulative loss of up to circa 215 houses and up to circa 35 commercial properties and associated infrastructure/ services. Loss of main road links, including section of B1159.
6.09	Mundesley to Bacton Gas Terminal	Managed Realignment	No Active Intervention	No Active Intervention	Loss of some of Mundesley Holiday Camp. Loss of less than 10 seafront properties along southern end of Mundesley. Loss of Grade 1 agricultural land.	Further loss of Mundesley Holiday Camp and of Hillside Chalet Park. Cumulative loss of less than 15 seafront properties along southern end of Mundesley. Further loss of Grade 1 agricultural land.	Further loss of Mundesley Holiday Camp and Hillside Chalet Park. Cumulative loss of less than 55 seafront properties at southern end of Mundesley. Total loss of up to approximately 20 hectares of Grade 1 agricultural land.
6.1	Bacton Gas Terminal	Hold the Line	Hold the Line	Hold the Line	Possible slight loss of cliff-top land in front of the Gas Terminal.	No loss of terminal, but possible issues due to drop in beach level.	No loss of terminal, but possible issues due to drop in beach level.
6.11	Bacton, Walcott & Ostend	Hold the Line	Managed Realignment	Managed Realignment	No loss of property or land behind the existing defences between Bacton and Walcott. Loss of up to circa 35 properties at Ostend.	Cumulative loss of up to circa 195 seafront residential and 20 commercial properties. Loss of associated infrastructure. Loss of some caravan park land. Loss of main link road between Walcott and Bacton and also the emergency access route from Bacton Gas Terminal.	Cumulative loss of between circa 195 and 385 seafront residential and circa 20 to 25 commercial properties and associated infrastructure. Further loss of some caravan park land. Existing link between Walcott and Bacton and also the emergency access route from Bacton Gas Terminal lost by 2055.
6.12	Ostend to Eccles	Managed Realignment	Managed Realignment	Managed Realignment	Loss of less than circa 15 properties (commercial and residential), primarily along Beach Road, Happisburgh. Loss of cliff top caravan park land at Happisburgh. Loss of HM Coastguard Rescue facility. Loss of Grade 1 agricultural land.	Cumulative loss of between circa 15 and 20 properties (commercial and residential), primarily along Beach Road, Happisburgh. Further loss of cliff top caravan park land at Happisburgh. Further loss of Grade 1 agricultural land.	Cumulative loss of between circa 20 and 35 properties. Loss of cliff top caravan park land at Happisburgh. Total loss of up to approximately 45 ha of Grade 1 agricultural land.
6.13	Eccles to Winteron	Hold the Line	Hold the Line	Conditional Hold the Line	No loss of property or land behind the existing defences.	No loss of property or land behind the existing defences.	No loss of property or land behind the existing defences.



## Appendix 3: Regulation 18 Schedule of Representations

Extract of Report of Representations at Regulation 18 stage.

References to 'Officer Summary' indicate that lengthier submissions were made and have been summarised.

### Policy ENV3 - Heritage & Undeveloped Coast

#### Comments made by Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV3	Witham, Mr I M (1216498)	LP201	Support	A much-needed policy for north Norfolk. Suggest add to the policy wording: "provided that the relocation would not have a significantly adverse visual impact upon the landscape of the Undeveloped Coast area".
ENV3	Johnson, Mr & Mrs (1215700)	LP141	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> There are many other really important areas within the county that should also be given similar priority. It is a fact that the current coastal habitat and AONB will be lost due to erosion in the future. If biodiversity is to be preserved then wildlife must have other areas to move to. Unless inland areas of wildlife habitat and biodiversity are similarly protected from inappropriate development there will be a gradual reduction in the county's biodiversity and important wildlife habitat. Inland wildlife habitat is also a natural resource that enhances the lives and physical and mental well-being of residents, promotes tourism and associated businesses and adds to the character of the area.
ENV3	Johnson, Mr Jamie (1216384)	LP341 LP539	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Where it is assumed that Figure 5. page 93 will be supplemented by new Proposals Maps, the area shown shaded green as 'Undeveloped Coast' should be amended in line with the current proposals maps to show established settlements within the area which are already developed and should be recognised as distinct from the wider 'undeveloped coast' area in which they are sited. For accuracy and clarity the following settlements should be removed from the green-shaded 'Undeveloped Coast' area on figure 5 and follow the current proposals maps demarcation including Stiffkey, Cley Next the Sea, Salhouse, Trimingham, Lessingham, Eccles on Sea including the Cart Gap to North Gap coastal ribbon, and Sea Palling.
ENV3	Mr Phillip Duncan (1217309)	LP392	Object	Proposed Policy ENV3 The Plan (Fig 5) is insufficient to clearly show the proposed area of Undeveloped Coast.

Individuals	Number Received	Summary of Responses (Policy ENV3)
Summary of Objections	1	No substantive issues raised: Figure 5 is insufficient to clearly show the proposed area of Undeveloped Coast.

<b>Summary of Supports</b>	3	Three support this policy. Overall support, much-needed policy for North Norfolk. Protection should be given to important areas of wildlife habitat and biodiversity. Undeveloped Coast on Proposals Map needs to be updated to exclude existing settlements and consideration to <b>adding to the policy wording: "provided that the relocation would not have a significantly adverse visual impact upon the landscape of the Undeveloped Coast area"</b> .
<b>Summary of General Comments</b>	0	None received
<b>Overall Summary</b>		No substantial issues raised. Support for policy, considered to be much-needed for North Norfolk. Protection should be given to important areas of wildlife habitat and biodiversity. Consideration should be given to amending the Undeveloped Coast on Proposals Map to exclude existing coastal settlements. Figure 5 is insufficient to clearly show the proposed area of Undeveloped Coast.
<b>Council's Response</b>		Noted, Consider comments in the finalisation of the policy. The majority of growth is located in those settlements identified as sustainable growth locations and as such are identified as outside the Undeveloped Coast designation. It is not appropriate to exclude smaller settlements which the policy seeks to manage appropriate development in . The boundaries will be reviewed along with the finalisation of policy SD3- settlement hierarchy. The map is an illustration, more detail can be found on the interactive proposals map on line. <b>Consider updating policy in line with suggested policy wording: "provided that the relocation would not have a significantly adverse visual impact upon the landscape of the Undeveloped Coast area"</b> .

### Comments made by Parish & Town Councils

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ENV3	Bacton & Edingthorpe Parish Council (149585)	LP239	Support	A great deal of Bacton is designated "undeveloped coast" . Strong support for the continued operation of this policy, with reference to the area's links to the near-by Norfolk Coast AONB and to the Bacton Gas Terminal.	Support Welcome.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ENV3)
<b>Objection</b>	0	The policy approach was strongly supported.
<b>Support</b>	1	
<b>General Comments</b>	0	

## Comments made by Organisations & Statutory Consultees

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV3	Broads Authority (321326)	LP806	General Comments	Figure 5 could helpfully show the Broads	Noted : Consider feedback in the future iterations of the Plan
ENV3	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746, LP754	General Comments	This is considered to represent an unduly restrictive policy, particularly given the overlap with the AONB offering a national statutory designation reinforced by Local Plan policy which provide an adequate safeguard against which to assess development proposals as they come forward. The policy should be omitted.	Disagree. The purpose of the policy is to protect the character of the Undeveloped Coast and recognises that the undeveloped coast is an important national and international resource. Developments that do not require a coastal location should be directed elsewhere to protect the appearance, character and environment of the area.
ENV3	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP506	Support	Support	Support welcomed
ENV3	Historic England (1215813)	LP705	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Broadly welcome this policy	Support noted

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV3)
Objection	0	Limited comments received, no substantive issues raised. The approach was broadly supported, however one respondent thought the approach was unduly restrictive given the existence of national policy approach to the AONB.
Support	2	
General Comments	2	

## Comments made on Alternative Options

Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
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Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
ENV3	Mr & Mrs Johnson (1215700)	AC027	Support	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Supports Assessment ENV3. - There are many other really important areas within the county that should also be given similar priority. It is a fact that the current coastal habitat and AONB will be lost due to erosion in the future. If biodiversity is to be preserved then wildlife must have other areas to move to. Unless inland areas of wildlife habitat and biodiversity are similarly protected from inappropriate development there will be a gradual reduction in the county's biodiversity and important wildlife habitat. Inland wildlife habitat is also a natural resource that enhances the lives and physical and mental well-being of residents, promotes tourism and associated businesses and adds to the character of the area.</p>	Comments noted: This comment repeats the support ENV1 made against the First Draft Local Plan (Part 1).

## Policy SD11 - Coastal Erosion

### Comments made by Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD11	Mr Phillip Duncan (1217309)	LP384	Object	Proposed Policy SD11 The policy proposes to limit new development within the Coastal Change Management Area (CCMA). Footnote 25 states that the CCMA “can be viewed on the existing Core Strategy Proposals Maps”. However, there is no such designation on the CS Proposals Maps. The maps do show a Coastal Erosion Constraint Area, which refers to CS Policy EN11 – which the text confirms was informed by Shoreline Management Plans (SMPs) dating to 2006 -7. The Draft Local Plan refers to SMPs adopted 2012 and other studies undertaken since the SMPs were adopted. Therefore, it is expected that the Areas of Coastal Change/Erosion Constraint would be reviewed for the Local Plan 2016 – 36 and that the extent of CCMA would be clearly shown on a plan. There is a plan (Fig 5) included in the Draft LP which indicates the CCMA but it is not clear enough.
SD11	Burke, Mr Stephen (1216753)	LP798	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Villages and towns on the coast and at risk of erosion and flooding should be properly protected to maintain existing communities, encourage tourism and protect productive agricultural land and wildlife
SD11	Green, Mr Stephen (1218541)	LP770	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> New homes should not be built in areas at risk of coastal erosion.

Individuals	Number Received	Summary of Responses (Policy SD11)
Summary of Objections	2	Two objections to this policy. Villages and towns on the coast should be protected from the risk of coastal erosion and flooding in order to maintain existing communities, encourage tourism and protect agricultural land and wildlife. The Coastal Erosion Zone is not included on the Proposals Map.
Summary of Supports	0	None received.
Summary of General Comments	1	One comment received, new houses should not be built in areas at risk of coastal erosion.
Overall Summary		Representations relate to the concerns over the implications of coastal erosion. Want to see the protection of villages and towns along the coast. Consider whether the Proposals Map shows the Coastal Erosion Zone clearly enough.
Council's Response		The shore Line management plan provide the strategic approach to management of the coast. The policy approach seeks to reduce risk from coastal change by avoiding in appropriate development in vulnerable areas in line with national policy. Taken together with SD12 the approach seeks to provide a framework to address coastal adaptation.

## Comments made by Parish & Town Councils

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
SD11	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD11)
Objection	0	No comments received.
Support	0	
General Comments	0	

## Comments made by Organisations & Statutory Consultees

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD11	Natural England (1215824)	LP714	General Comments	The Plan should consider the marine environment and apply an Integrated Coastal Zone Management approach. Where Marine Plans are in place, Local Plans should also take these into account. More detail about the East Inshore and East Offshore Marine Plans can be found here.	Noted: Consider comments in the development of the policy
SD11	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP492	Support	Can geology be mentioned? Exposure and erosion of geology through coastal erosion and inappropriate development/projects and possible loss of geological records. There is a need to involve the Norfolk Geodiversity Partnership in applications and projects.	Support welcomed: Consider comments in the finalisation of the policy
SD11	RSPB (1217391)	LP425	General Comments	The RSPB recognises the need to protect particular areas of the coast and that this needs to be appropriate to location and ensure no increased erosion along other stretches of the coast. This will require more detailed assessments that consider changes to coastal processes and seek to understand changes in the offshore environment as well. Changes to sediment inputs offshore can affect fish spawning areas and in turn affect success for tern colonies. Any	Noted- consider the removal of the word 'material' from the policy wording.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>assessments regarding coastal change must also consider these wider issues, especially in a changing climate and weather patterns. We note that the policy states no "material adverse impact". This is not consistent with Habitats Regulations terminology and should be amended. Proposed changes: We recommend the policy makes it clear that all potential impacts from coastal changes will be assessed. We recommend that "adverse impact" is used in the policy and "material" is removed.</p>	
SD11	<p>Timewell Properties (John Long Planning Ltd.) (1216647 (1216065) )</p>	LP362	Object	<p>Blue Sky Leisure notes that the Policy's reference to the 'Coastal Change Management Area, as defined on the Policies Map', equates to the Policies Map Coastal Erosion Constraint Area. This affects part of the Woodhill Park, operated by Blue Sky Leisure. The Coastal Change Management Area is presumably a composite of the 2025; 2055; and the 2105 Coastal Erosion zones (i.e. the area likely to be affected by development over the next 100 years). Blue Sky Leisure is currently working on proposals that seek to address the impact the erosion zones have on its operation at Woodhill Park, East Runton; and is very concerned that the Plan's policy as currently drafted, is overly restrictive and limits opportunities for the staged 'roll back' or possibly relocation of existing tourist related businesses within the Coastal Change Management Area. For instance, the Policy fails to explicitly acknowledge the potential for development such as static caravans and touring caravan pitches, to be safely moved from the most vulnerable areas of the Coastal Change Management Area (the 2025 Coastal Erosion Zone), to less vulnerable areas in the Coastal Change Management Area (the 2055; and the 2105 Coastal Erosion Zone); in a managed and phased way. For many businesses along the North Norfolk Coast, a staged/phased 'roll back' of development within the Coastal Change Management Area will be more feasible, viable and deliverable, than a complete move outside of the Area, particularly given some of the Plan's other restrictive policies, including Policies for new/relocated/replacement tourist accommodation; and policies that seek to protect the character and appearance of the North Norfolk AONB and Countryside. As currently drafted, the Plan will make it incredibly difficult to find suitable alternative and viable sites outside of the Coastal Change Management Area and close by the coast, where visitors want to stay. Much of the area close to the coast and outside of the Coastal Change Management Area is AONB and designated Countryside. The Plan has restrictive policies that seek to protect the character and appearance of the AONB. Recent experience would suggest that opportunities for the relocation of tourist accommodation from vulnerable areas, to other</p>	<p>Noted - consider the flexibility of the wording of Policy SS 11 and whether this would inhibit future tourism development in the area.</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>less vulnerable coastal locations are few and far between, with very little take up and even where sites have been found they have not always been supported. It is going to be virtually impossible for tourist accommodation operators to find suitable and affordable potential sites within or adjacent to settlements close to the coast. Such sites often have a 'hope value' or are already optioned for residential development. A relocated caravan and camping site cannot compete with the expected land values that residential development would generate, particularly given the considerable costs of relocation. The Plan needs to acknowledge the special circumstances that affect the relocation of tourist business and be more understanding and supportive, if it is to deliver the 'roll back' policy. Also, Blue Sky Leisure is concerned that for relocation/replacement proposals to be acceptable they need to be supported by a Coastal Erosion Vulnerability Assessment demonstrating that the proposal will not result in an increased risk to life, or a significantly increased risk to property AND also demonstrate, substantial economic, social and environmental benefits to the community. It is not clear what these benefits may be or how the scale of the benefits will be judged, in order that proposals may meet this requirement. The Council's own evidence acknowledges the importance of tourist accommodation to the North Norfolk accommodation, and it is not clear what other evidence will be required. Furthermore, for those businesses seeking to relocate (or expand) from the Coastal Change Management Area to another coastal location outside of it, the Policy requires them to demonstrate that the long-term implications of coastal change on the development have been addressed. However, on the basis that the Coastal Change Management Area deals with coastal change over a 100 year period (up to 2105); and the Plan's period is only up to 2036, it is not clear why this is requirement is needed within the policy. Any development outside of the Coastal Change Management Area must be 'safe' from coastal change by definition for at least 100 years. Predicting implications of coastal change beyond 100 years is going to be almost impossible. Blue Sky Leisure acknowledges that there may be opportunities to relocate existing threatened clifftop businesses to alternative sites further away from the coast, but even this is a complex and difficult process, that involves an extremely high level of risk, as well as cost. Relocations sites have to be attractive and viable locations or people will not stay in them. Unfortunately, most of the attractive locations in North Norfolk are covered by restrictive policies and zonings such as the AONB, the Coastal strip etc. which realistically means the finding of alternative</p>	



Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>sites is virtually impossible. Blue Sky Leisure therefore suggests that the policy needs to be more supportive of businesses operating within the Coastal Change Management Area, particularly those providing tourist accommodation. These businesses are a vital component of the District's economy; and the Plan should be helping such businesses to deal with Coastal Change rather than hinder them through overly restrictive planning policies. Proposed change: Blue Sky Leisure suggest that an additional provision is included in the policy after point 5 to explicitly support existing tourist accommodation businesses operating within the Coastal Change Management Area, along the lines of" .....planning permission will be granted for development proposals subject to:..... ....6. Proposals being for the phased roll-back of tourist accommodation within the Coastal Change Management Area, provided they are from the more vulnerable parts of the area (2025 Coastal Erosion Zone) to the less vulnerable parts of the area (2055 and 2105 Coastal Erosion Zones) and will not result in an increased risk to life." Also, that the requirement for proposals to demonstrate that "...substantial economic, social and environmental benefits to the community..."; is not applicable to existing businesses, particularly those providing tourist accommodation; and the part of the policy that requires "...New development, or the intensification of existing development in a coastal location, but outside the Coastal Change Management Area, will need to demonstrate that the long-term implications of coastal change on the development have been addressed..." is deleted.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD11)
Objection	1	<p>Greater recognition of East Inshore and East Offshore marine management plan was suggested. Representations related to concerns around the management of existing caravan business and the ability to operate a phased retreat / relocation due to the restrictive policy wording and impacts of other countryside policies in the document. As such consideration should be given to the explicit support for existing tourist accommodation after point 5.</p>
Support	1	
General Comments	2	

## Comments made on Alternative Options

Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
SD11	Mr & Mrs Johnson (1215700)	AC019	General Comments	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> It is pointless building homes on the coast to serve the local community if they are all snapped up by second home owners. That does not address the needs of the local community. That will just lead to continued demand for more housing. Second home ownership pushes up costs and demand for affordable housing. Second home ownership should be discouraged by charging full council tax, business rates where appropriate and by local occupancy clauses in developments. The acquisition of development sites by individuals for the purpose of second homes should be positively discouraged. There are many examples of homes of this nature on the coast built with inappropriate materials, out of character detailing and inappropriate size. Also too many overdeveloped sites are changing the character of the villages.</p>	Comments noted: This comment repeats the support SD11 made against the First Draft Local Plan (Part 1).

## Policy SD12 - Coastal Adaptation

### Comments made by Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD12	Johnson, Mr & Mrs (1215700)	LP139	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Agree but with comments. There are now many second homes in coastal villages. Allowing development to allow roll back and people to move because of erosion is fine for local residents. Development and gradual using up of the rural countryside to allow second home owners to relocate is not a good use of limited resources. Local occupiers affected by erosion should be given priority.

Individuals	Number Received	Summary of Responses (Policy SD12)
Summary of Objections	0	None received
Summary of Supports	1	One supports the policy but suggests that coastal adaption should be for local occupiers and shouldn't allow second home owners to relocate.
Summary of General Comments	0	None received
Overall Summary		Limited comments received on this policy. Coastal adaption should be for local occupiers and shouldn't allow second home owners to relocate.
Council's Response		Disagree. Coastal adaptation is for the whole community. Occupation is not a land use planning consideration

### Comments made by Parish & Town Councils

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)
SD12	Sheringham Town Council (1217426)	LP548	General Comments	Condition 2 of the Proposals for the relocation and replacement of dwellings affected by erosion states that new dwelling(s) is/are used as a primary residence. STC's concern is that if the replacement of holiday homes/second homes is not permitted under the policy then this could lead to increased pressure on an already stretched housing supply.
SD12	Bacton &	LP239	Object	Concerned that cliff-top caravan parks to sites within the undeveloped coast
				Comments noted: Consider comments in the development the policy.
				Disagree, the policy presents a positive

Edingthorpe (149585)			would be potentially harmful to the landscape; the policies should provide for the safeguarding of the landscape are essential. This could encroach into the local countryside and conflict with Policy SD4. Designation of Bacton as a Growth Village could potentially limit the future availability of suitable sites for relocation of facilities threatened by coastal erosion.	approach for long term resilience, community cohesion, enabling adaptation to take place in advance of actual loss. Proposals are required to respect existing character and appearance and accord with wider landscape policies as a whole.
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Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD12)
Objection	1	Issues raised include the need to exclude existing second homes from the policy and exclude caravan parks in the "Undeveloped Coast" where impacts on the landscape are potentially damaging.
Support	0	
General Comments	1	

### Comments made by Organisations & Statutory Consultees

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)
SD12	Environment Agency (1217223)	LP455	Support	We welcome the inclusion of these paragraphs and support the sustainable approach to coastal adaptation described in paragraphs 7.92 to 7.94. Restricting inappropriate development within Coastal Change Management Areas (CCMAs) is critical, however, there is also a need to promote adaptation to change within areas subject to erosion, particularly with regards to the diversification of businesses, such as diminishing arable farms, or within rural coastal communities within managed realignment or no active intervention frontages. It is important that this need is reflected within local planning policies that actively promote adaptation within CCMAs. Within a managed realignment or no active intervention frontage it is important that development proposals have the opportunity to demonstrate wider benefits, through a sustainability appraisal or similar, when compared to the 'do nothing' scenario associated with no development. For example, rural properties in coastal change areas can be affected by blight, subject to crime and require costly demolition. An opportunity to develop a more suitable land use or construct a moveable dwelling, prior to decline of the existing property, should not be discounted. Paragraph 7.91

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	
				<p>indicates that the Coastal Change Management Area is identified on the Policies Map. It is important that there is the facility to update this map in accordance with new, reputable and scientifically robust evidence. A digital, GIS based map (as per the Environment Agency Flood Zones) provides an ideal resource and avoids accidental use of old, paper copies of plans.</p>	
SD12	Environment Agency (1217223)	LP456	General Comments	<p>Policy SD 12 – Coastal Adaptation We have some concerns that policy SD12 is impracticable for some commercial and business uses, for example, private landlords. Relocation costs, including construction and purchase of a site, often make a rollback opportunity unfeasible. This results in the rollback not being utilised; loss of housing stock and the original asset remaining within the risk zone. Some Local Authorities are considering offering 2 for 1 property rollback opportunities to try to offset the high cost of relocation and encourage uptake of rollback opportunities; to retain housing stock and remove assets from the risk zone. The second section of Policy SD12 (focused on dwellings) also states that new development must be in a location that is well related to the coastal community from which it was displaced. We recommend inclusion of ‘or, that the relocated dwelling should be in a location which exhibits a similar or improved level of sustainability’, or similar. Relocation close to an existing community is often difficult for various reasons; appropriate land may not be available, permissions must be obtained and may be constrained by other policies, the potential rollback site landowner will expect a significant return on the site and like for like development is rarely possible or feasible. This can result in the rollback opportunity not being utilised, the property remaining within the risk zone and a loss of housing stock. Therefore, extending this principle elsewhere within the district, if local land is unavailable or purchase not feasible, should encourage rollback and early adaptation for the benefit of the wider area. Policy SD12 also states that ‘the new development (must be) beyond the Coastal Change Management Area’. It is important that that this sentence does not preclude the possibility of replacement of a residential property with a re-locatable dwelling. A property that can be easily lifted and wholly removed from the erosion risk zone represents a considerable improvement in the sustainability of a residential site versus a landowner taking no action to adapt. The construction of permanent dwellings using a rollback opportunity is often prohibitively expensive and local land may not be available, therefore this solution offers a viable adaptation opportunity, particularly if taken as early as possible within the forecasted risk zone. We recommend that North Norfolk District Council considers the</p> <p>Concerns noted: Consider comments in the development the policy.</p>	

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	
				development of a Coastal Change Supplementary Planning Document, as per other coastal authorities in East Anglia. Furthermore, we recommend that the Norfolk and Suffolk Coastal Authorities, Statement of Common Ground, Coastal Zone Planning is referred to within this section of the document.	
SD12	Natural England (1215824)	LP715	General Comments	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b></p> <p>We welcome a policy that facilitates coastal adaptation and roll back options for housing and infrastructure in areas vulnerable to coastal erosion. Shoreline adaptation can provide opportunities to improve sustainability, create and maintain crucial coastal habitat and biodiversity. We suggest that the Local Authority consider such opportunities on a strategic scale where feasible and appropriate.</p>	
SD12	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP493	Support	We support in ensuring no detrimental impact on landscape.	
SD12	Timewell Properties (John Long Planning Ltd.) (1216647 (1216065) )	LP363	Object	<p>Blue Sky Leisure is concerned that the policy as currently drafted, is overly restrictive and limits opportunities for the staged 'roll back' of development from the Coastal Change Management Area into the Countryside. The Policy as drafted only allows for the relocation of proposals from the Coastal Change Management Area that will be affected by coastal erosion in the next 20 years of the date of the proposal. However, this may not be the most economically viable or feasible approach to relocation of certain uses. For instance, in some circumstances, it will be more economical and feasible to move development within the Coastal Change Management Area that is not directly affected until after 20 years, and perhaps affected by the next erosion epoch (i.e. the 2055 Coastal Erosion Zone). Blue Sky Leisure suggests that this time limit requirement should be deleted, or extended, and/or provisions included within the policy to allow for development not affected until after 20 years to be relocated to the Countryside, where it can be demonstrated that it is not feasible or viable to restrict relocation to just that development affected within 20 years of the proposal. Furthermore, the Policy includes additional onerous requirements that will need to be met in order for a 'roll back' proposal to be supported. As currently drafted, proposals will need to result in "...no detrimental impact upon the landscape, townscape or biodiversity of the area, having regard to any special designations...". Blue Sky Leisure</p>	

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)
				<p>consider that demonstrating that there is no detrimental impact will be a high hurdle to address, and potentially impossible given the nature of certain developments and coastal landscapes. The impact of all these additional requirements and potentially cost burdens, coupled with the considerable costs of relocation could have the effect of making relocation proposals unfeasible and/or unviable and effectively, undermine the 'roll back' strategy. The Plan should be more helpful and proactive in its approach and properly support the continuation of businesses threatened by Coastal Erosion, rather than hinder them. Blue Sky Leisure suggests that the policy should be drafted in a way that allows for the benefits of removing development away from the Coastal Change Management Area, including the continuation of an existing viable business, and the landscape benefits of removing development from coastal areas; to be weighed against the impacts on the landscape, townscape or biodiversity in the Countryside. Proposed changes: In other words the policy should refer to "...no net detrimental impact...taking into account the landscape, townscape or biodiversity benefits resulting from removal of development from the Coastal Change Management Area...", rather than "...no detrimental impact...". Additionally, the Policy should also acknowledge that achieving the Policy's requirements will be weighed up and balanced with the viability of relocation, with the ability for requirements to be relaxed where it would help with the viable relocation of an existing business out of the Coastal Change Management Area.</p>

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD12)
Objection	1	Restricting inappropriate development within Coastal Change Management Areas (CCMAs) is critical, however a key issue raised was for the policy to promote more active adaptation with CCMAs and for the Council to reflect on more incentives to make the approach of roll back more deliverable e.g. 2 for 1. Suggestions include the consideration of relocation to a location that exhibits similar or improved sustainability rather than restrictions on to the coastal community it replaces. The environment Agency support the consideration of a further SPD in coastal management and the reference to the Norfolk and Suffolk Coastal Authorities, Statement of Common Ground, & Coastal Zone Planning is referred to within this section of the document. One representation raised concerns around the prescriptive 20yr limit highlighting that this may not be the most economically viable or feasible approach to relocation of certain users.
Support	2	
General Comments	2	

## Comments made on Alternative Options

Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
SD12	Mr & Mrs Johnson (1215700)	AC020	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> There are now many second homes in coastal villages. Allowing development to allow roll back and people to move because of erosion is fine for local residents. Development and gradual using up of the rural countryside to allow second home owners to relocate is not a good use of limited resources. Local occupiers affected by erosion should be given priority.	Comments noted: This comment repeats the support SD12 made against the First Draft Local Plan (Part 1).