

Draft Coastal Adaptation Supplementary Planning Document

January 2023



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1 Introduction

- 1.1 The Coastal Adaptation Supplementary Planning Document (SPD) provides guidance on policy approaches along the coast from Holkham in Norfolk to Landguard Point, Felixstowe in Suffolk. The SPD supports the implementation of Local Plan policies, provides case study examples of coastal adaptation best practice and will:
- Ensure Coastal Communities continue to prosper and can adapt to coastal change; and
 - Provide detailed guidance for developers, landowners, development management teams, and elected members on the interpretation of policies with a whole coast approach.
- 1.2 The SPD cannot create new or amend existing planning policies nor can it prescribe that particular areas of land be developed for particular uses; this is the role of the wider development plans of each local planning authority. When adopted the SPD will be a material consideration in determining planning applications.
- 1.3 The SPD has been prepared through a partnership of East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority (The Broads), and the shared Coastal Partnership East team¹. An initial consultation was held between 4 September 2020 and 16 October 2020 and the responses received have helped to prepare this draft document.
- 1.4 While this document provides useful guidance for a range of scenarios it will not be possible to address the complexity of issues in every scenario. As with all coastal related development projects, early engagement with the local planning authority and Coastal Partnership East will always be encouraged to maximise opportunities and manage risks to life and property in a timely manner.

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

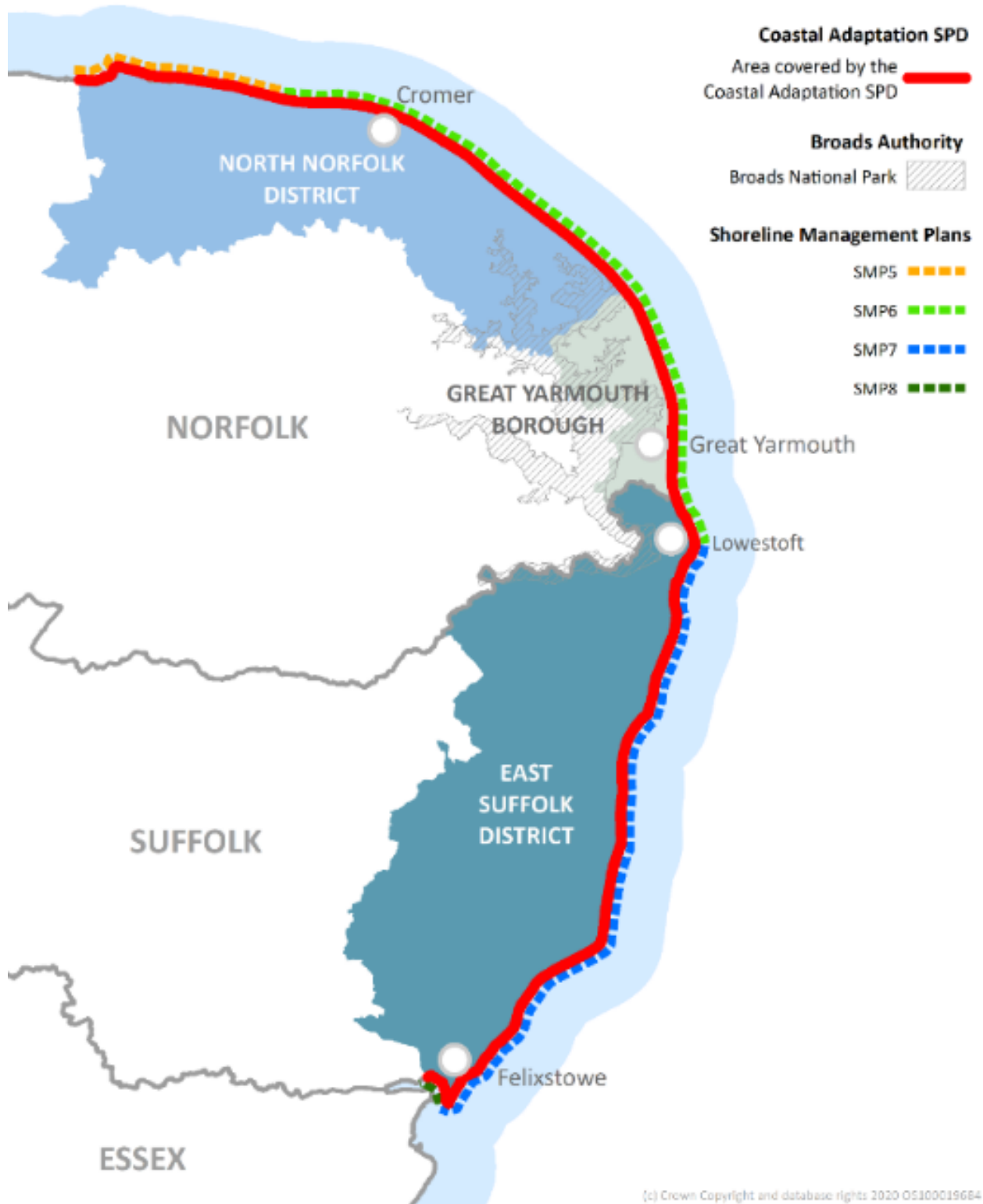


Figure 1 - The area to which the SPD applies

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

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

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

What are the coastal processes and geology affecting the coast?

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

2.3 The coast is prone to erosion through natural processes such as storms, surges and high levels of ground water, resulting over thousands of years in continued changes to the coast. While these changes predominantly lead to erosion of the coast, there are areas where accretion (growth of land at the coast) of the coast occurs, which can present a variety of challenges and opportunities for coastal communities, and the environment. Coastal processes are natural processes driven by geology, tides, weather and climate change that affect the coast in a variety of ways. Detailed geomorphology and coastal processes for specific sections of the coast are set out in our Shoreline Management Plans² (SMP).

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

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

2.5 Large areas of the coast and inland coastal zone are covered by natural and historic environment designations. These designations seek to maintain areas, buildings and structures for the significant

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

contribution they make in respect of natural beauty, heritage, geodiversity, special habitats, and biodiversity, some of which are of national and international importance.

- 2.6 The historic, cultural, and natural qualities of the coast attract many visitors every year and are an essential part of the successful local and regional economy. Other essential elements of the economy include agriculture, major ports and smaller harbours that sustain our maritime activities (from local fishing to global trade) and the diverse and growing energy sector, as well as the infrastructure that knits everything together. These benefits taken together make for an attractive place for leisure and recreation, to do business, as well as to live.



Cromer Pier with theatre, shops and lifeboat station in rough seas

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

How does climate change affect the coast?

- 2.9 The risks from climate change enhanced coastal erosion are recognised in the UK Climate Change Risk Assessment (2022)³, the Government’s National Flood and Coastal Erosion Risk Management Policy Statement (2020)⁴, the Environment Agency’s National Flood and Coastal Erosion Risk Management Strategy (2020)⁵, and the Committee on Climate Change’s ‘Managing the Coast in a Changing Climate’ report (2018)⁶. These publications cite evidence of, and recent projections for a changing climate, and coastal erosion implications.
- 2.10 Trends indicate accelerating sea-level rise, milder wetter winters, drier hotter summers, and an increase in extreme weather events such as storm surges. The effects of climate change are likely to accelerate rates of coastal erosion. There are particular implications for cliff instability as slips and slumps can be caused by groundwater changes due to periods of extreme winter precipitation and periods of drying. The resilience of risk management infrastructure, for example degradation through storm surge damage, is also a key impact.
- 2.11 Coastal change is complex and there are many additional drivers and uncertainties in the system. These include diverse geology and the interaction of risk management infrastructure with coastal processes (i.e. interruptions in the natural process of sediment supply and movement along the coast). Alongside uncertainties regarding the rates of climate change, predicting coastal change will become more challenging.



Stormy sea at Gorleston Harbour looking towards Great Yarmouth

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

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

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

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

2.12 Taken together these effects will continue to increase the pressure on coastal communities, natural and historic environments, businesses and infrastructure in the following ways:

- Increased risk to life.
- Increased risk to property.
- Increased pressures on coastal risk management measures.
- Increased risks to protected habitats.
- Increased risk of loss of infrastructure.
- Increased risk of a reduction in economic activity.
- Increased risk of loss of heritage assets.
- Increased risk of loss of farmland.
- Increased costs of emergency response.
- Increased repair and maintenance of coastal risk management measures.
- Increased risk of saline intrusion, particularly in agricultural land.

2.13 Understanding these complex coastal processes, the socio-economic and environmental benefits that are provided by the coast, and the likely impacts of climate change are integral to devising the most appropriate strategies for the continued long-term management of our coast. An outline of available coastal management measures and policies is set out in the next chapter.

3 Coastal Management Measures and Policies

Introduction

- 3.1 The fundamental principle of risk management and planning policy in coastal areas is that of Integrated Coastal Zone Management (ICZM), which is a process that requires the adoption of a joined-up and participative approach towards the planning and management of the many different elements in coastal areas (land and marine). The partnership authorities have and continue to implement an ICZM approach, as evidenced by the Norfolk and Suffolk Coastal Authorities Statement of Common Ground for Coastal Zone Planning (Appendix 1). As coastal erosion risk management authorities, East Suffolk Council, Great Yarmouth Borough Council, and North Norfolk District Council, are signatories to the Coastal Concordat for England⁷.
- 3.2 This chapter provides an overview of coastal management and planning policy at the national, local and neighbourhood scales. Appendix 2 (Organisation Roles & Responsibilities) seeks to support this chapter and sets out the various roles, permissive powers and responsibilities of the key organisations that engage in coastal management and planning.

National Policy and Guidance

- 3.3 The Government's Flood and Coastal Erosion Risk Management Policy Statement⁸ sets out the long-term ambition to create a nation more resilient to future flood and coastal erosion risk, reducing the risk of harm to people, the environment and the economy. The Environment Agency's Flood and Coastal Erosion Risk Management Strategy⁹ provides a framework for guiding the operational activities and decision making of practitioners supporting the direction set by government policy. The key objectives of both the Government's Policy Statement and the Environment Agency's Strategy are to ensure existing and future places and infrastructure are resilient to coastal change and that everyone understands the risks of coastal change, their responsibilities and how to take action. Clearly set out within both documents is the importance of collaborative working to ensure the key policy objectives are met.
- 3.4 The Environment Agency is a non-departmental public body with a wide range of responsibilities, which includes taking a strategic overview of the management of coastal erosion. This strategic overview role allows the Environment Agency to provide leadership for the management of coastal change including where other risk management authorities have operational responsibilities, thereby helping to facilitate a joined-up approach to tackling coastal erosion risk in a manner consistent with the principles of ICZM.

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

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

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

- 3.5 The ICZM approach is carried into the National Planning Policy Framework (NPPF)¹⁰, which sets the Government’s planning policies at the national level. Local Plans, which set the planning policies for local planning authority areas, must be consistent with the policies set out in the NPPF to be deemed ‘sound’¹¹ and therefore capable of being adopted and used to determine planning applications across local planning authority areas. Thus, Local Plan policies must be consistent with the Government’s ICZM approach.
- 3.6 The NPPF also sets out that Local Plans should manage the risks from development in areas at risk of coastal change. To do this Coastal Change Management Areas (CCMA) should be identified within Local Plans and inappropriate development within CCMA should be avoided. A CCMA is defined as an area identified in plans as likely to be affected by physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion.
- 3.7 The Planning Practice Guidance for Flood Risk and Coastal Change¹² provides guidance as to how NPPF policy can be implemented through the preparation of land use plans (e.g. Local Plans and Neighbourhood Plans) and the determination of planning applications.
- 3.8 The above documents are focussed on the terrestrial planning system, in other words land-based as opposed to the marine-based planning system. The boundary between the two systems is between the mean spring high and low water marks, creating an overlapping area where both the terrestrial and marine planning systems operate. Marine planning¹³ is governed by the Government’s UK Marine Policy Statement¹⁴ and the Marine Management Organisation’s (MMO) Marine Plans. The Marine Policy Statement provides the national framework for the preparation of Marine Plans and decision making affecting the marine environment. Marine Plans provide detailed policy and spatial guidance for an area and help ensure that decisions within a plan area contribute to delivery of UK, national and any area specific policy objectives. The Marine Policy Statement and Marine Plans are managed in an integrated and holistic way, in line with the principles of ICZM. The Marine Plans relevant to the SPD area are:
- East Inshore and Offshore Marine Plans (2014)¹⁵
 - South East Inshore Marine Plan (2021)¹⁶
- 3.9 A marine licence may be required for any relevant developments¹⁷ which may impact the marine environment, such as coastal risk management structures.
- 3.10 The coast is also home to a large number of natural and historic environment designations, from large scale Special Areas of Conservation to small listed buildings, and across the terrestrial and marine planning realms. These designations are often susceptible to coastal change which can result in loss of

¹⁰https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

¹¹ The test set out in the National Planning Policy Framework (NPPF) against which local plans are assessed by Government appointed planning inspectors.

¹² <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

¹³ More information about UK marine planning is available here: [Explore marine plans - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/uk-marine-policy-statement)

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

¹⁵ [East Marine Plans - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/east-marine-plans)

¹⁶ [The South East Marine Plan Documents - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/south-east-marine-plan-documents)

¹⁷ Information concerning the need for a marine license for development is available here: [Explore marine plans - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/explore-marine-plans)

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

Local Policy

3.11 At the local level there are a range of documents that provide coastal planning and risk management policy and guidance. Local Plans, Shoreline Management Plans, and Neighbourhood Plans are foremost among these. Each of these documents are prepared in order to meet specific, often competing, objectives. Objectives of Shoreline Management Plan policies include:

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

3.12 Objectives of Local Plan and Neighbourhood Plan policies cover the following:

- To increase our resilience to coastal change, helping to protect households and the local economy,
- To support healthy, safe, cohesive and active communities through improving health, wellbeing and education opportunities for all,
- To achieve diverse and prosperous economic growth,
- To enhance the vitality and viability of town centres and villages,
- To protect and enhance tourism and cultural facilities,
- To enhance and protect the natural, built and historic environment and provide accessible green infrastructure and public open spaces,
- To achieve high quality design,
- To mitigate human impact on the environment and reduce contributions to climate change,
- To deliver new homes, and
- To improve the quality and provision of all types of infrastructure.

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



Sea defences/rock berm at Happisburgh with cliff erosion shown

- 3.14 Shoreline Management Plans (SMP) provide coastal authorities with an opportunity to assess the risks associated with coastal processes and long-term implications for managing the coast. The eastern half of SMP5 (Hunstanton to Kelling Hard)¹⁸, SMP6 (Kelling Hard to Lowestoft Ness)¹⁹, SMP7 (Lowestoft Ness to Felixstowe Landguard Point)²⁰, and the northern most point of SMP8 (Landguard Point to Two Tree Island)²¹ cover the coastal area to which this SPD relates. As key sources of evidence SMPs are integral to the formulation of Local Plan policy in respect of the coast, in particular the identification of the CCMA.
- 3.15 Local Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed and sustainable places. Local Plans are at the heart of the planning system with a requirement in law for their planning policies to be accorded with by planning applications unless material considerations indicate otherwise. For coastal planning, the overarching objective for Local Plans is the same as that of the NPPF, to avoid inappropriate development in vulnerable coastal areas and to facilitate relocation and replacement of assets at risk of loss.

¹⁸ [Shoreline Management Plan 5 \(Hunstanton to Kelling Hard\)](#)

¹⁹ [Shoreline Management Plan 6 \(Kelling Hard to Lowestoft Ness\)](#)

²⁰ [Shoreline Management Plan 7 \(Lowestoft Ness to Felixstowe Landguard Point\)](#)

²¹ [Shoreline Management Plan 8 \(Landguard Point to Two Tree Island\)](#)



Eroded cliffs at East Runton

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

- East Suffolk Council²² Suffolk Coastal Local Plan (adopted 2020)²³
- East Suffolk Council Waveney Local Plan (adopted 2019)²⁴
- Great Yarmouth Local Plan Part 1 (adopted 2015)²⁵
- Great Yarmouth Local Plan Part 2 (adopted 2021)²⁶
- North Norfolk Core Strategy (adopted 2008)²⁷
- The Broads Local Plan (adopted 2019)²⁸

3.17 North Norfolk District Council is at an advanced stage with their emerging Local Plan, which when adopted will supersede the above North Norfolk Core Strategy. The draft SPD is intended to also provide guidance in relation to the emerging North Norfolk District Council Local Plan²⁹, which has reached an advanced stage where weight can be given in accordance with paragraph 48 of the NPPF.

3.18 Neighbourhood Plans can be most easily understood as smaller scale Local Plans, most frequently undertaken by parish councils and applying to their designated areas. Neighbourhood Plans must be in general conformity with the strategic policies set out in the relevant Local Plan/s and must have regard

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

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

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

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

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

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

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

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

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

Local Plan policies

- 3.19 This section highlights the key Local Plan policies addressing coastal planning matters within the partnership authorities' Local Plans.
- 3.20 The following policies identify the CCMA and the circumstances whereby development may be acceptable within the CCMA:
- East Suffolk Council Suffolk Coastal Local Plan policy SCLP9.3 (Coastal Change Management Area)
 - East Suffolk Council Waveney Local Plan policy WLP8.25 (Coastal Change Management Area)
 - Great Yarmouth Local Plan Part 2 policy GSP4 (New Development in Coastal Change Management Areas)
 - North Norfolk Core Strategy policy EN11 (Coastal Erosion), the CCMA is referred to as the Coastal Erosion Constraint Area. Emerging NNDC Local Plan policy CC5 (Coastal Change Management) is also relevant as the emerging plan has reached an advanced stage.
- 3.21 While the Broads Local Plan does not identify a CCMA, policy SSCOAST (The Coast) provides a framework whereby operational development in the coastal zone, as identified on the Broads Local Plan policies map, will generally not be permitted unless in exceptional circumstances.
- 3.22 The above policies, except Broads Local Plan policy SSCOAST (The Coast), also require Coastal Erosion Vulnerability Assessments (CEVA) to support relevant planning applications. North Norfolk Core Strategy policy EN11 (Coastal Erosion) does not refer to CEVA by name but does require evidence of the vulnerability of proposed development to coastal change to support planning applications.
- 3.23 The following policies support rollback and relocation of development at risk from coastal change:
- East Suffolk Council Suffolk Coastal Local Plan policy SCLP9.4 (Coastal Change Rollback or Relocation)
 - East Suffolk Council Waveney Local Plan policy WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion)
 - Great Yarmouth Local Plan Part 1 policy CS13 (Protecting Areas at Risk of Flooding or Coastal Change)
 - Great Yarmouth Local Plan Part 2 policy E2 (Relocation from Coastal Change Management Areas)
 - North Norfolk Core Strategy policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk). Emerging North Norfolk Local Plan policy CC6 (Coastal Change Adaptation) is also relevant as the emerging plan has reached an advanced stage.

- 3.24 The Broads Local Plan does not contain a policy regarding rollback and relocation of development at risk from coastal change as there is no development at risk from coastal change along The Broads coast. However, the effects of coastal change on the estuary in the form of permanent inundation is acknowledged and consideration must be given to this risk irrespective of the Local Plan policy context.

4 Development in the Coastal Change Management Area

Introduction

- 4.1 This chapter provides guidance regarding the circumstances in which development may be appropriate within the Coastal Change Management Area (CCMA) across the relevant local authorities. All coastal development proposals should take account of the timeframe of erosion risk across the CCMA. The primary purpose of the CCMA is to identify land that is likely to be vulnerable to coastal change now and in the future (across a 100 year timeframe). Incorporating the CCMA into Local Plans supports this purpose with the objective of avoiding inappropriate and guiding appropriate development within the CCMA.
- 4.2 The collective Shoreline Management Plans (SMPs) for the coast covered by this SPD provide large-scale assessment of the risks associated with coastal erosion and flooding. The SMPs set out the coastal management policy for the short (up to 2025), medium (up to 2055) and long (up to 2105) term erosion risk areas. This policy framework addresses risks to people and the built and natural environment with the intention of informing policy and planning decisions in a sustainable manner. As such, the emerging and adopted Local Plans of the Local Authorities have used the relevant SMPs as the evidence base to form the CCMA within their Local Plans and mapped these areas on their respective Policies Maps³⁰. For information, North Norfolk District Council's existing Core Strategy Policies Map refers to a Coastal Erosion Constraint Area, which is also informed by the relevant SMPs.
- 4.3 The three erosion risk areas that make up the CCMA, the geographical extent of each risk area and the description of the nature of the risk in each area are detailed in each SMP. This information will provide a valuable insight for those seeking to understand the development options for a given area of land.
- 4.4 While the SMP evidence supporting the erosion risk areas, and therefore the CCMA, is robust, it is also important to note the following:
- The rate of coastal erosion (cliff recession rate) will rarely be steady or predictable. The SMP erosion risk areas show the likely overall extent of erosion for each epoch, but for example, it would be wrong to infer that halfway through a particular epoch the erosion will extend to half of the risk area.

³⁰ Suffolk Coastal Local Plan and Waveney Local Plan policies map:

<https://eastsuffolk.maps.arcgis.com/apps/webappviewer/index.html?id=f6a98a5e2ddc4c209729cd8a180645b4>

Great Yarmouth Local Plan policies map:

<http://gybc.maps.arcgis.com/apps/webappviewer/index.html?id=ad21a10d70144a44949037739fe5acfd>

North Norfolk Core Strategy policies map: <https://www.north-norfolk.gov.uk/tasks/planning-policy/proposals-map/>

The Broads Local Plan policies map: <https://www.broads-authority.gov.uk/planning/planning-policies/development/policies-maps-final-adopted-versions>

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

What types of development can be appropriate in a CCMA

4.5 Each development proposal will have a different level of investment and a different intensity and degree of use, meaning the potential increase of risk to property or life will vary. When referring to the development matrix (Table 1) in this section, other considerations, such as the scale of development will be of particular relevance when considering the degree of significance in terms of risk and consequently its appropriateness. In addition, it is important to highlight that all proposals will be considered against all relevant Local Plan policies of the determining local planning authority and all other material planning considerations.

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

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

4.7 The types of development this can include are:

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

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

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

Aerial view of Corton showing cliffs, groynes and caravan parks



Environment Agency ©2011

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

Development Type	Short term (up to 2025)	Medium term (2025 – 2055)	Long term (2055 - 2105)	Notes
New permanent residential development, including replacement dwellings or change of use to a permanent dwelling	No	No	No	Not permitted within the CCMA. See paragraphs 4.15 and 4.16 for more information.
New permanent non-residential development	No	Possibly	Possibly	Assessment will take account of CEVA information and planning conditions are likely to be added in order to maintain the value to the community in perpetuity (for the lifetime of the development). See paragraphs 4.17 and 4.18 for more information.
Temporary and time-limited development	Possibly	Yes	Yes	Assessment will take account of CEVA information and time-limited conditions will be added to a planning consent. See paragraphs 4.19-4.23 for more information.
Open Land Uses (i.e. no buildings)	Yes	Yes	Yes	Assessment will take account of CEVA information and time-limited conditions will be added to a planning consent. See paragraph 4.24 for more information.
Changes of use (non-residential)	Possibly	Possibly	Possibly	Assessment will take account of CEVA information and time-limited conditions will be added to a planning consent. See paragraphs 4.25 and 4.26 for more information.
Extensions (including householder development)	Possibly	Yes	Yes	Assessment will take account of CEVA information and in particular, the level of risk to life and property. See paragraphs 4.27 and 4.28 for more information.
Intensification of Use (non-residential)	No	Possibly	Possibly	Assessment will take account of CEVA information and type of use. See paragraphs 4.29 and 4.30 for more information.
Redevelopment or reconfiguration of existing sites (non-residential)	No	Possibly	Possibly	Assessment will take account of CEVA information and time-limited conditions will be added to a planning consent. See paragraph 4.31 for more information.
Replacement of Development Affected by Coastal Change (non-residential)	No	Possibly	Possibly	Assessment will take account of CEVA information and type of use. Time-limited conditions will be added to a planning consent. See paragraphs 4.32 and 4.33 for more information.
Essential Infrastructure and Community Uses	Possibly	Possibly	Possibly	Assessment will take account of CEVA information. See paragraphs 4.34 and 4.35 for more information.

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

New permanent residential development

- 4.15 Each of the participating Local Planning Authorities, other than the Broads Authority, have adopted and emerging local plan policies that state that planning permission for permanent new residential development will not be permitted within the identified CCMA. This also includes replacement

dwelling and changes of use of other buildings to permanent residential accommodation. For further clarity, this relates to all types of residential use, such as individual dwellings, sheltered housing, student accommodation, hostels, shared housing for disabled people, nursing homes and care homes, residential education and training centres.

- 4.16 If non-permanent residential development/ use is being proposed, an applicant should refer to the temporary and time-limited development/ uses section.

New non-residential development

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

Temporary and time-limited development/ uses

- 4.19 Temporary and time-limited development within a CCMA relates to development proposals that requires a coastal location and can be granted planning permission for a specific period of time in order to:
- reduce the risk to people and the development by taking account of the assessment of vulnerability; and
 - manage the removal of the development to minimise the impact on the community and on the natural and historic environment.
- 4.20 Development that is temporary (whether by its nature or by limiting its planning consent) is unlikely to constitute an increase in property or life at risk, provided it can be controlled in order to ensure its removal or relocation prior to the erosion risk becoming imminent. Temporary or time-limited development will often be considered as an appropriate response to coastal change and can help facilitate 'adaptation' to change. Also, as stated in the PPG³¹, 'The use of modular forms of construction can mean buildings can be disassembled and reassembled in a new location as a way of minimising the cost of relocation.' Such temporary and time-limited uses include, but are not limited to, use of land for

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

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

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

Open Land Uses

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

Changes of Use

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

Extensions (including householder development)

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

Intensification of Use (non-residential)

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

Redevelopment or reconfiguration of existing sites (non-residential)

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

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

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

Essential Infrastructure and Community Uses

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

Coastal Erosion Vulnerability Assessment (CEVA)

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

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

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

- is aware of and understands the relevant policies associated with coastal change;
- has demonstrated that the development will be safe through its planned lifetime, without increasing risk to life or property, or requiring new or improved coastal risk management measures;
- has demonstrated that the proposed development will not increase the risk of coastal erosion elsewhere, for example from increased groundwater and surface water run-off, resulting in cliff destabilisation;
- has demonstrated that the development will not impair the ability of communities and the natural environment to adapt sustainably to the impacts of a changing climate;
- has considered the measures for managing the development at the end of its planned lifetime, including any proposals for the removal or relocation of the development before the site is immediately threatened by coastal change; and
- that decisions taken on investment are made with a full understanding of the risks and uncertainties.

4.40 For practical reasons it is difficult to define the lifetime of development as each development will have different characteristics. For guidance, new permanent residential development should be considered for a minimum of 100 years, and non-residential development should be considered to have a lifetime of at least 75 years³². However, there is significant complexity and variety in the characteristics of non-residential development and therefore 75 years should be the starting point for assessment rather than a definitive figure. Applicants will be required to justify why they have adopted a given lifetime for the development when they are formulating their CEVA, and must demonstrate that the risks have been adequately assessed against the economic, social and environmental benefits of the development within the CCMA.

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

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

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

- 4.42 If the development proposal comprises a mix of uses or different characteristics that would warrant the identification of multiple design lifetimes for elements of the overall development, the CEVA should adopt the longest development lifetime. For example, if a development proposal comprised a mix of permanent residential, retail and office uses, it may be considered that the development lifetime of the retail and office elements would be less than that of the 100 year residential element, perhaps 75 years. In this situation the CEVA should adopt the 100 year lifetime as the lifetime for the whole development proposal. Alternatively, the CEVA could comprise a number of assessments, each evidencing a different design lifetime for a specific element of the overall development.
- 4.43 The detail contained in the CEVA should be proportionate to the degree of risk and the scale, nature and location of the proposed development. Reflecting the requirements of the relevant Local Plan policies, the matrix below (Table 2) indicates which development proposals would be expected to be supported by a CEVA, the level of detail that would be required in relation to different types of development and in different locations.
- 4.44 The Broads has not identified a CCMA within its Local Plan due to their small stretch of coast and its undeveloped nature. The Broads therefore does not feature in the table below.

Table 2: CEVA matrix for development types

Local Plan	Check	Permanent residential development	Non-residential development	Temporary development & uses (e.g. caravans)	Extensions to existing development	Modifications to existing development
East Suffolk Council (Suffolk Coastal Local Plan)	Within CCMA	Not permitted	Level B	Level B	Level B	Level A
	30m risk zone ³³	Level B	Level A	Level A	Level A	Level A
	30m – 60m risk zone landward of coastal risk management structures in areas of soft cliffs ³⁴	Level B	Level A	Level A	Level A	Level A
East Suffolk Council (Waveney Local Plan)	Within CCMA	Not permitted	Level B	Level B	Level B	Level A
	30m risk zone	Level B	Level A	Level A	Level A	Level A
Great Yarmouth Borough Council (Great Yarmouth Local Plan Part 1)	Within CCMA	Not permitted	Level B	Level B	Level B	Level A
	30m risk zone	Level B	Level A	Level A	Level A	Level A
North Norfolk District Council (North Norfolk Core Strategy)	Within Coastal Erosion Constraint Area (CECA) ³⁵	Level B	Level B	Level B	Level B	Level A
North Norfolk District Council	Within CCMA	Not permitted	Level B	Level B	Level B	Level A
	30m risk zone	Level B	Level A	Level A	Level A	Level A

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

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

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

Local Plan	Check	Permanent residential development	Non-residential development	Temporary development & uses (e.g. caravans)	Extensions to existing development	Modifications to existing development
(emerging Local Plan)						

Note: Red colour = will not be permitted, Orange/terracotta colour = possibly acceptable and Level B CEVA required, Green colour = possibly acceptable and Level A CEVA required.

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

Level A CEVA

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

Level B CEVA

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

4.48 It would need to consider the following:

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

4.49 Development proposals within the CCMA will also need to:

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

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

5 Rollback and Relocation

Introduction

- 5.1 Across the SPD area there are a number of residential and commercial properties as well as businesses, and key infrastructure including roads and pathways, situated within the Coastal Change Management Areas, and at risk from erosion. This can have a direct effect upon the long-term sustainability of affected coastal communities, for example through the erosion of land, to the potential effects emanating from ‘blight’ and a reduced desire to invest in those properties and the wider area.
- 5.2 In light of these effects upon coastal communities, national policy requires local plans to make provision for development and infrastructure that needs to be relocated from Coastal Change Management Areas. Planning practice guidance advises that either formally allocating land in a Local Plan, or allowing for relocation where planning permission would normally be refused are two ways in which this could be achieved.
- 5.3 In response, each planning authority³⁶ within the partnership area includes policies in their Local Plans to help proactively rollback or relocate development in areas of risk to those areas further inland that are deemed ‘safer’ in a timely fashion, before they are impacted by coastal erosion.
- 5.4 The relevant policies with respect to rollback and relocation from each Local Plan³⁷ are set out below:
- Policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk) - North Norfolk Core Strategy, Policy CC6 Coastal Change Adaptation – emerging Local Plan
 - Policy E2 (Relocation from Coastal Change Management Areas) - Great Yarmouth Local Plan Part 2
 - Policy WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion) - Waveney Local Plan
 - Policy SCLP9.4 (Coastal Change Rollback or Relocation) - Suffolk Coastal Local Plan
- 5.5 This chapter provides further detail and guidance on the interpretation of the above policies, such as how land or sites may be identified for rollback or relocation purposes; how such land may be acquired or identified; and how land, which has been vacated, should be managed or utilised in the future to the point at which it is eventually eroded.
- 5.6 It is important to note that at the present time the Government does not offer ‘compensation’ for properties lost as a result of coastal change. Compensation is not a matter which can be considered under planning policy. Some government funding can be accessed to assist with demolition of residential properties under a Coastal Assistance Grant if they were purchased before 15 June 2009.

³⁶ The Broads Local Plan does not include any policies relating to rollback and relocation

Residential land-uses affected by coastal erosion

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

General locational principles

- 5.9 The North Norfolk (EN11) and Great Yarmouth (E2) Local Plan policies are broadly similar in their approach when guiding alternative areas or land to enable sites to rollback or relocate residential properties to. These require sites to be within or adjacent to identified settlements, whilst outside either the Coastal Change Management Area (Great Yarmouth Local Plan) or Coastal Erosion Constraint Area (North Norfolk Local Plan).
- 5.10 Whilst the terms 'identified settlement', 'Coastal Change Management Area' and 'Coastal Erosion Constraint Area' are clearly defined within both Local Plans, the term adjacent is not. In most circumstances the preference will be for development to share a land boundary with an existing settlement (for example adjacent to a settlement's development limits/boundaries) as this helps to maintain a more sustainable form of development and helps to reduce the potential for isolated dwellings in the countryside.
- 5.11 Notwithstanding this preference, the term may also be more flexibly applied in order to take into account the prevailing character or function of each settlement, and in circumstances where it is not possible to share a land boundary e.g., where settlements do not have development limits/boundaries.
- 5.12 Similarly to the Great Yarmouth and North Norfolk Local Plans, the Waveney (WLP8.26) and Suffolk Coastal (SCLP9.4) Local Plan policies also require relocated sites to be located outside of their respective Coastal Change Management Area. Whilst there is no requirement for site's to be 'adjacent' to development limits/boundaries, the policies do permit relocation or rollback outside of settlement boundaries³⁸, but also requires those locations to exhibit a similar or improved level of sustainability with respect to access and facilities as per the original dwelling.
- 5.13 In simple terms this means that in interpreting the policy, the applicant will need to clearly demonstrate that the occupiers of the rollback or relocated dwelling will not be disadvantaged with respect to accessing facilities (e.g. primary school, food shop, bus services, employment opportunities etc) than the location the original dwellings was in; and where possible, demonstrate an improved level of access to such facilities.

³⁸ Equivalent term to development limits or development boundary

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

Size of replacement/relocated properties

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

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

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

Identifying alternative areas or land

- 5.22 The relevant Local Plan policies are intended to aid coastal business owners and commercial operators to make longer-term decisions about investment and growth. For obvious operational and business reasons, it will not always be practicable to relocate businesses to sites outside the Coastal Change Management Area (for example, a tourism business that relies on its seashore location).
- 5.23 For this reason, some types of development will be permitted inside the CCMA (see Table 1 – Development Matrix). Careful consideration of the precise risk in the particular area will need to be undertaken through a Coastal Erosion Vulnerability Assessment (CEVA).
- 5.24 The phasing or timing of relocation can be critical to the success of any rollback scheme. For practical and operational reasons a relocation may have to be spread over an extended period of time (a caravan site, for example). This can have implications for local communities as it could lead to a longer period of construction. At the same time it is recognised that an extended period of time may be needed to help absorb the costs and potential loss of business before the new site is fully established
- 5.25 Opportunities to relocate and redevelop within existing site boundaries may also be appropriate. This could include moving buildings away from the cliff edge to vacant land; reconfiguration of the layout of buildings within the site; reusing more vulnerable parts of the site for open land uses or other temporary uses. Therefore, in the short-term risk area, proposals for temporary uses, open land uses, some changes of use and small extensions may be acceptable. In both the medium and long-term risk areas within the CCMA, where the CEVA demonstrates there will be no increased risk to property or people as a result of the development, larger extensions, new buildings and some intensification of use may be permitted. A balance will need to be made between the risk associated with retaining a coastal location and the wider economic benefits for the operator and wider community. Proposals for development that demonstrates that this is the case and that the longer term coastal risk planning is incorporated, will be supported.
- 5.26 Where relocation to a new site is necessary, this should normally be located where it is accessible (or well-related³⁹) to the community from which it was displaced. Though this will depend on the specific type of use being relocated, this will normally mean no more than 100-200m away from the existing community and with appropriate highway links for vehicular and non-vehicular traffic.
- 5.27 There are some sports grounds and courses which are located on the coast, such as football pitches. Whilst some sports facilities are only for the benefit of their membership, almost all allow visitors and

³⁹ As per North Norfolk Local Plan Policy EN11

some are available to the public (to hire, for example). Some coastal golf courses are at high risk, as often they are on undefended stretches of the coast.

- 5.28 Golf courses often have a dual role, firstly as a local sporting, leisure and cultural facility (they often have a restaurant, bar and function rooms, for example) and secondly as an important tourist location for golfing societies and golfing holidays. Therefore, it is important to retain golf courses where at all practicable. It may sometimes be possible to create new holes inland to replace those under threat, depending on land availability (and other considerations); this would be supported in principle. Some enabling development might be considered necessary to support the creation of new holes and this is discussed in Chapter 6.
- 5.29 Where a business or commercial use does not rely on a coastal location as part of its overall business plan, timely relocation to a site outside the CCMA would be supported. Short-term re-use of buildings/land that become vacant may be suitable for alternative uses, but will be subject to time-limited planning conditions to manage risk.
- 5.30 To help businesses and commercial uses relocate to alternative sites outside the CCMA, there may be support for the development of mixed-use schemes to assist the viability of new proposals. This could take the form of new residential or retail developments but will be subject to applicants demonstrating that the scheme will not be viable without the inclusion of other forms of development. Additionally, enabling development if proven to be necessary will only be permitted on appropriate sites in sustainable locations. This will depend on the specific purpose of the enabling development and considered in the planning balance of other policies in the respective local plans. It would also be expected that any enabling development would only be a small proportion of the new development (see Chapter 6 – public benefits).

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



Habitats affected by coastal erosion

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

Remediation, demolition and treatment of existing sites and their uses

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

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

Acquisition of land for relocation and rollback

- 5.41 There is no single preferred approach when seeking to acquire sites for relocation or rollback purposes as this will ultimately be dependent upon the individual circumstances of the development and/or the business use in question.
- 5.42 In some circumstances local planning authorities may be able to help facilitate developments through a joint venture with the local community, as was the case in the relocation of 9 properties at Happisburgh (see the case study in Appendix 4 for more details). However, such a model remains a developing area and therefore the Local Planning Authorities encourage engagement from and with applicants at an early stage.
- 5.43 Applicants may also wish to consider other ‘longer-term’ routes to establish areas for potential rollback. This could include promoting land for rollback use by working with the local planning authority or parish council during the preparation of their respective Local Plans and Neighbourhood Plans.
- 5.44 Coastal Partnerships East (CPE) secured significant funding from Defra as part of the Flood and Coastal Resilience Innovation Programme (FCRIP), which is running from 2022-2027. CPE will be working with four communities in Norfolk and Suffolk, plus four additional ‘twin’ locations, to deliver adaptation and resilience options which will be applicable more widely. This will include planning, engagement, technical financial and policy tools to support coastal transition. See <https://engageenvironmentagency.uk.engagementhq.com/esf008-coastal> for more details.
- 5.45 North Norfolk District Council has been selected to deliver the Coastal Transition Accelerator Programme (CTAP) which will seek to work with communities, and business in developing Transition Plans and practical actions to seek to prepare for coastal change. This programme will be delivered between 2022-2027 and will help shape future government support. More details can be viewed at [North Norfolk Coastal Transition Accelerator Programme \(CTAP\) | Engage Environment Agency \(engagementhq.com\)](https://engageenvironmentagency.uk.engagementhq.com/norfolk-coastal-transition-accelerator-programme-ctap)

6 ‘Enabling’ Development

Introduction

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

What is ‘enabling’ development?

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

Enabling development and coastal adaptation/rollback

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

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

Example scenarios for enabling development

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

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

Public benefit(s)

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

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

Relocating residential dwellings

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

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

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

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

Relocating tourism accommodation and facilities

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

Relocating business premises

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

Relocating other types of use/development

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

Enabling development to implement coastal risk management structures

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

Lifespan of the proposed development

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

Viability and enabling development

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

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

Enabling development and legal agreements

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

Key considerations

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

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

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

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

This statement of common ground is between:

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

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

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

Background

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

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

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

- A long term view
- A broad holistic approach

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

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

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

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

Shared Aims

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

Agreed Approach

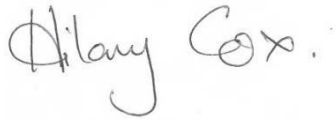
The signatory authorities agree to work together on coastal planning issues to:

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

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



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



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



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



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



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



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



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



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



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



Melanie Vigo di Gallidoro Chairman, Planning Committee Broads Authority



Haydn Thirtle
Chair, Broads Authority



Endorsed by the Environment Agency Mark Johnson, Regional Coastal Manager

Appendix 2 – Organisation Roles & Responsibilities

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

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

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

Appendix 3 – Coastal Erosion Vulnerability Assessment (CEVA) Template

Level A CEVA

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

Statement:

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

- Future sea erosion trends and rates are not able to be predicted with certainty hence forecasts of future shoreline positions are shown as indicative bands of risk at 20, 50 and 100 year intervals.

- Where future policies are based upon the provision and maintenance of structures to resist erosion pressure, it is not possible to guarantee that funding will be available to deliver this objective.
- It is possible that where the provision and maintenance of risk management structures is required to sustain a development over its design life, a contribution toward the cost of structure management may be sought from beneficiaries (including owners/occupiers of properties protected by the structures).
- Policies are reviewed and updated at regular intervals and may be changed to something less favourable than indicated at present.

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

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

10. Printed Name:

11. Date:

Level B CEVA

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

1. Name:
.....

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

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

4. Development Proposal:
.....

5. Relevant Shoreline Management Plan (SMP), please tick one (or more):
- SMP5 - Hunstanton to Kelling Hard
 - SMP 6 - Kelling to Lowestoft Ness
 - SMP 7 - Lowestoft Ness to Landguard Point
 - SMP8 - Essex and South Suffolk

6. SMP Policy Unit covering the development frontage:

7. Risk Band, please tick as applicable:
- 20 years
 - 50 years
 - 100 years
 - 30m risk zone

- 30-60m risk zone

- 8. Development category, please tick one:
 - New residential development
 - New non-residential development
 - Temporary Buildings, caravans and land uses
 - Extension to existing development
 - Modification to existing development

Statement

Please provide detailed answers to the following:

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

20. Printed Name:

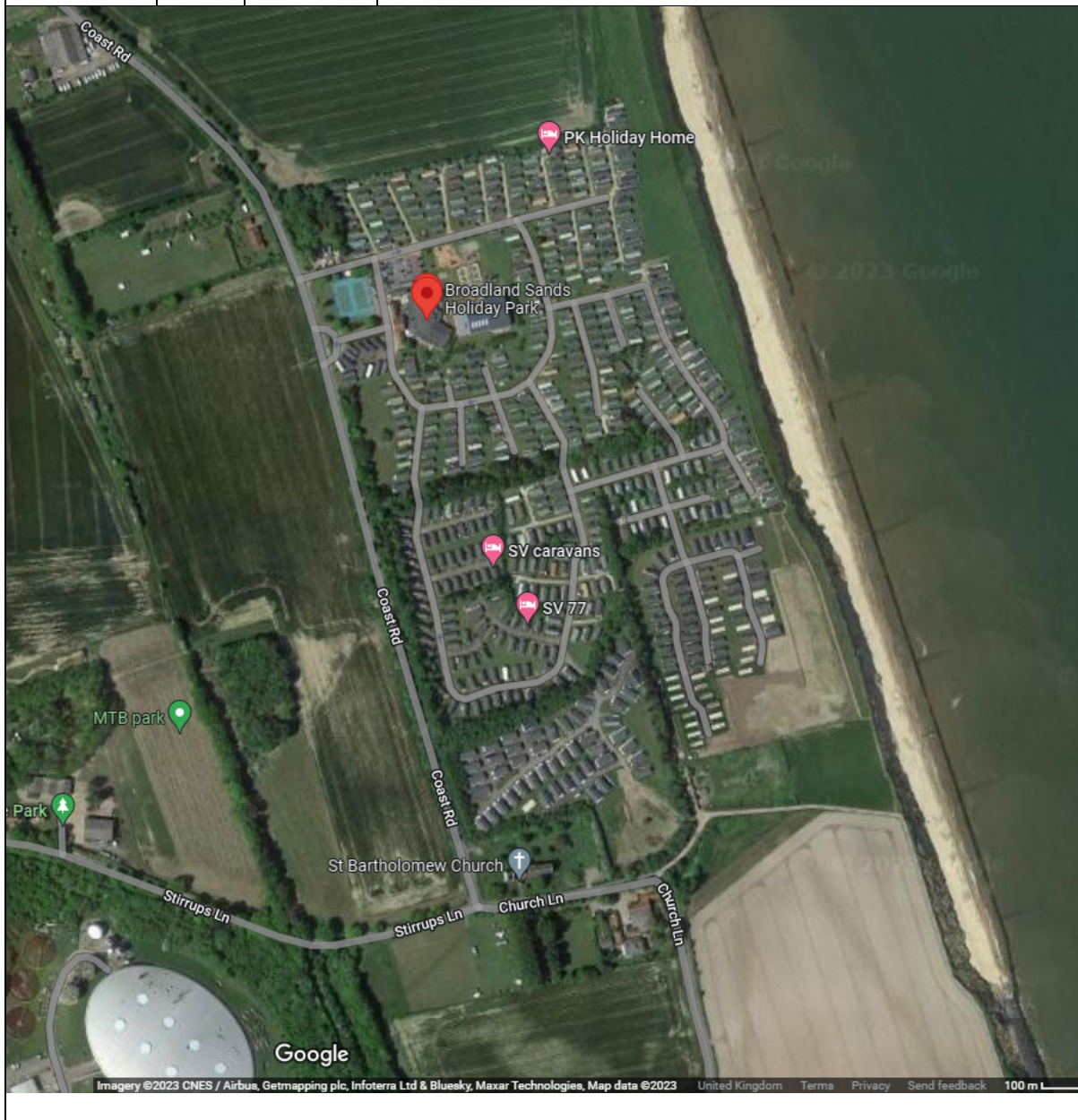
21. Date:

Appendix 4 – Case Studies

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

Broadland Sands Holiday Park, Corton, Suffolk

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



Key Details

- Tourism use but with community benefits including parking for church and public cycle/footpath
- Designed to be rolled back as cliff erodes
- Potential impact to landscape and setting of Grade I listed church
- Creation of cycle and walkways
- Creation of parking for the church
- Reduction in holiday caravans due to earlier refusal

Details

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

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



Lessons Learned

A balance needed to be found in relation to the impact on the setting of the grade I listed church and the economic benefits of the loss of a significant part of the site to coastal erosion.

- Early engagement with Historic England was needed to address earlier issues which resulted in a refused application for a larger number of vans over a larger area.
- In order to address these concerns, the overall number of caravans was reduced and the boundary pulled away from the south along with an increase in green spaces and increased planting.
- The church car park remained in the same location
- A number of highways agencies were included (SCC Highways, NCC Highways and Highways England) at the pre-application stage. This was due to the main access being via Hopton in Norfolk the North via the A47 or from Corton (Suffolk)
- The speed limit was also agreed by SCC to be reduced from 60mph to 30mph as there will be changes to the entrance and a crossing for pedestrians to access the main site along with potential increase in cyclists along the improved shared footway

Beach Road Car Park and Ramp replacement, Happisburgh, Norfolk

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



Key Details

- Community car park and Beach Access Ramp
- Designed to be rolled back as cliff erodes
- Ramp cut into cliff, no permanent materials used
- Car park materials can be moved/retreated when necessary

Details

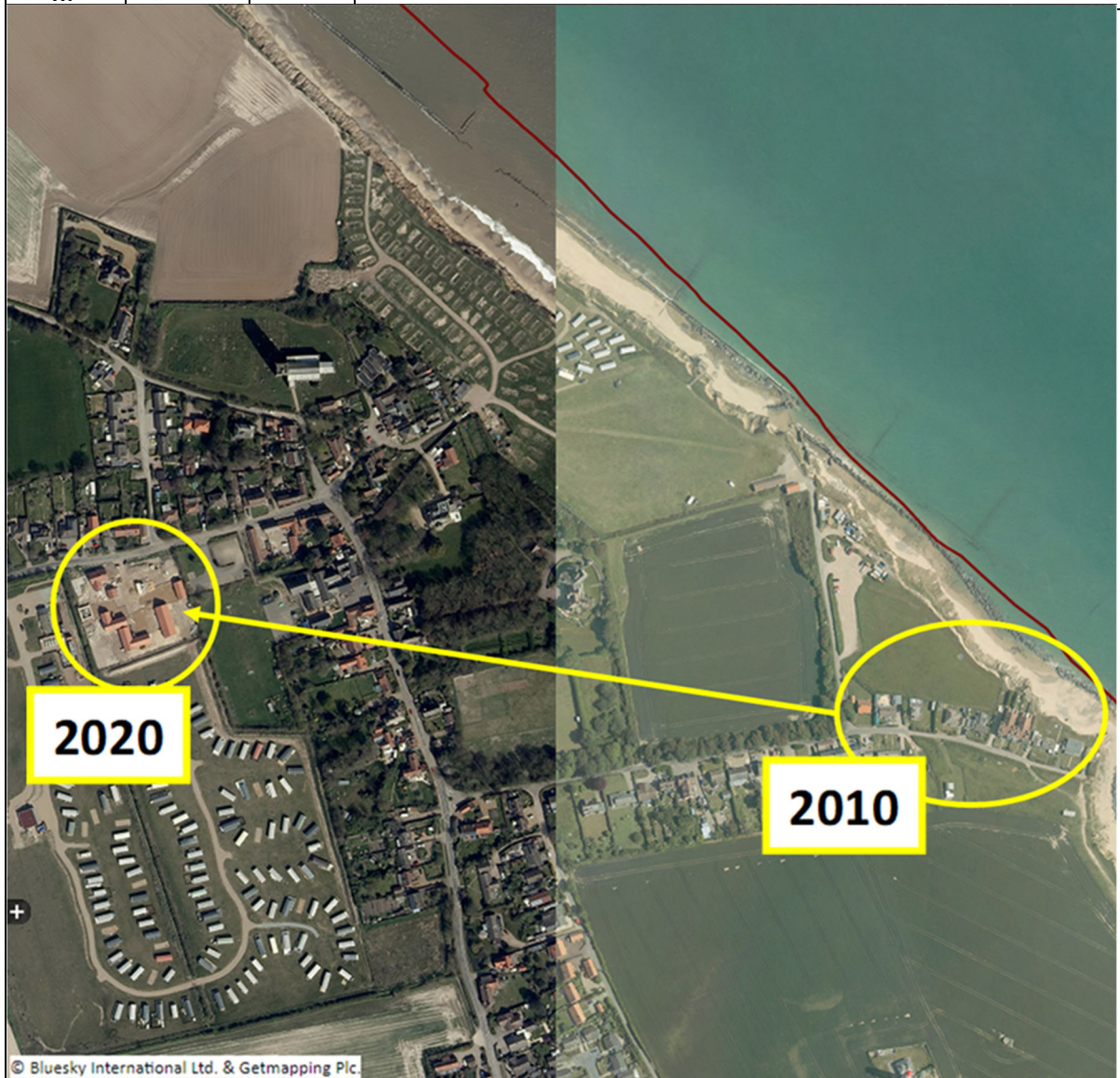
As old car park at imminent risk of erosion, new car park developed. No permanent materials used in new car park, designed to be taken up as and when it becomes necessary. Ramp cut into cliff, as ramp erodes away, new ramp is cut into cliff.

Lessons Learned

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

Beach Road residential property replacement, Happisburgh, Norfolk

Planning Number:	PM/16/04 28	Link:	https://idoxpa.north-norfolk.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=ZZT68LNMS298
Authority:	North Norfolk District Council	Applicant:	North Norfolk District Council
Date of Application:	2016	Keywords:	Rollback, EN12, Relocation, Residential, etc



Key Details

- Using government funding, nine properties at short-term (20 years) risk of erosion were purchased by North Norfolk District Council and demolished

- Nine properties of equivalent size gained consent on land within the parish but outside the coastal risk zone.
- The land remained in the ownership of a third party and a legal agreement was arranged between the applicant (NNDC) and the landowner.
- The land with consent was then sold and developed independently.
- NNDC recouped a third of their costs.

Details

Nine residential properties located within the twenty-year risk zone were purchased by North Norfolk District Council in 2011 under voluntary agreement. The rollback opportunity under local planning policy was secured by letter of agreement before the properties were demolished and the sites cleared and incorporated into wider clifftop open space. Sub-surface foundations and services were left in situ to minimise disturbance to the cliff. An assessment was completed as to where the relocated residential properties could be located. Although the policy allowed for properties to be located at other settlements within the district, it was agreed to seek to retain them within the parish from which they originated, to continue to maintain the viability of the village. Options were explored for a number of sites using viability assessments similar to one used to allocate development sites for local plans. The site was selected as preferred based on these criteria and a willing landowner. A legal agreement was established between the developer (NNDC) and the landowner to secure the rollback opportunity and commercial relationship between the two parties. A planning application was prepared and submitted. As with many local developments, there was a mixed response from the local community. These included calls for properties to be affordable homes, rather than open-market dwellings. Planning policy allows for like for like replacement and part of this trial was to understand how cost-viable such an approach would be. The land with planning consent was sold on the open market to a property developer and was subsequently constructed. This was one of the first examples of residential property relocation/rollback, with the purchase of the original properties, associated costs, documents for planning applications, legal agreement, and final profit share on the sale of the development site, approximately one third of NNDC's outlay was recouped.

Lessons Learned

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

Land West of Little Marl, Trimingham, Norfolk

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



Key Details

- Site expected to be lost to erosion in 2025-2055 epoch (epoch 2)
- Applicant had historic permission to build an additional bricks-and-mortar house
- Instead, applied to place a caravan and garage on the site

- This was a preferable type of home, given the risk of erosion

Details

Applicant had historic permission to build two bungalows on land within Epoch 2 (indicative erosion up to 2055). One bungalow had been built in 1991, so the permission for the whole scheme remained extant. As an alternative to the second bungalow, the landowner sought permission to instead station a caravan on the land and erect a garage, due to the potential loss of land by the impact of coastal erosion. This was seen as a pragmatic approach to the threat of erosion, in line with the preference for adaptation on the coast, given that the caravan would be movable at a future date when it became at risk. After liaising with CPE colleagues, garage was reduced from double to a single non-permanent wooden garage.

Lessons Learned

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

Easton Lane Easton Bavents, Reydon, Southwold, Suffolk

Planning Number:	DC/15/2428/DEM	Link:	https://publicaccess.eastsuffolk.gov.uk/online-applications/applicationDetails.do?activeTab=externalDocuments&keyVal=NPU1CIQX06000
Authority:	East Suffolk Council	Applicant:	Private Applicant
Date of Application:	08 June 2015	Keywords:	Residential Rollback

Key Details

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

Details

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