

Consultation Statement

Coastal Adaptation Supplementary Planning Document

September 2023



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1. Introduction

The Coastal Adaptation Supplementary Planning Document (SPD) provides guidance on the coastal adaptation planning policies of the following Local Plans:

- East Suffolk Council
 - Suffolk Coastal Local Plan (2020)
 - Waveney Local Plan (2019)
- Great Yarmouth Borough Council
 - Local Plan Part 1 (2015)
 - Local Plan Part 2 (2021)
- North Norfolk District Council
 - Core Strategy (2008)
- Broads Authority
 - The Broads Local Plan (2019)

Once adopted the Coastal Adaptation SPD will replace the following documents:

- ‘Coastal Erosion and Development Control Guidance’ (2009) covering North Norfolk District Council, and
- ‘Development and Coastal Change SPD’ (2013) covering the former Waveney area which now forms part of East Suffolk Council.

The Partnership of local planning authorities and the shared Coastal Partnership East team (the Partnership) has followed the approach to engagement as established in the Statement’s of Community Involvement adopted by each authority. At the start of preparation of the SPD the 2014 East Suffolk Council Statements of Community Involvement were in place (covering the former Waveney and Suffolk Coastal districts). East Suffolk Council has since adopted a new Statement of Community Involvement in April 2021 which applies to the consultation on the draft SPD. While preparing the Coastal Adaptation SPD the Partnership has consulted with relevant organisations and members of the public. Details of this consultation process are set out below.

An initial stage of consultation was held for 6 weeks between 4 September and 16 October 2020. A formal consultation on the draft SPD was held for 6 weeks between 25 January and 8 March 2023.

This Consultation Statement was first produced under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) to accompany the consultation on the draft SPD and has subsequently updated to reflect the consultation responses received during that consultation.

2. Who was consulted?

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

Initial consultation

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

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

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

Consultation on the Draft SPD

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

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

3. How were they consulted?

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

Initial consultation

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

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

Hard copies of the document were made available free of charge by post by contacting the Planning Policy and Delivery team as the usual locations for viewing documents were closed to the public, due to the Covid-19 pandemic.

The consultation was advertised via the Partnership's respective social media accounts (see Appendix 2).

The consultation sought responses to the following questions:

1. Do you consider the scope and proposed content of the Supplementary Planning Document to be appropriate?
2. Are there any elements of National or Local Planning Policy which should be particularly emphasised/explained in the SPD?
3. What guidance for development in the Coastal Change Management Area should be identified in the SPD?
4. Are the categories identified in section 3 appropriate and comprehensive or should others be identified?
5. What guidance on temporary development within the CCMA should be included?
6. What elements should be included within a Coastal Erosion Vulnerability assessment?
7. What guidance on Roll-back and relocation options should be included?
8. What guidance on enabling development should be included?
9. What case studies should be used in this SPD to demonstrate coastal adaptation best practice?
10. Do you have any other comments which could help the partnership prepare the SPD?

In total 63 individuals and organisations responded to the consultation. Between them they made 288 comments, as presented in the table in Appendix 3. The consultation responses can also be viewed on the East Suffolk Council website at [Responses to the Consultation - Coastal Adaptation Supplementary Planning Document Initial Consultation - East Suffolk Council, Strategic Planning Consultations \(inconsult.uk\)](#).

Consultation on the Draft SPD

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

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

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

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

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

4. What were the main issues raised?

Initial consultation

A summary of the main issues raised through the initial consultation is as follows.

1. Do you consider the scope and proposed content of the Supplementary Planning Document to be appropriate?
 - The SPD should change the planning policies concerning the coast as set out in Local Plans.
 - The SPD should change the approach to management of the coast as set out in the Shoreline Management Plans (SMP).
 - The SPD should address flood risk as well as coastal erosion risk.
 - The SPD should recognise the importance of the natural and historic environment along the coast and the benefits these environments provide communities and businesses.
 - The SPD should provide guidance relating to public have access at the coast and countryside.
2. Are there any elements of National or Local Planning Policy which should be particularly emphasised/explained in the SPD?
 - The SPD should explain the difference between terrestrial and marine planning.
 - The SPD should explain the difference between local plan and SMP policy.
 - The SPD should explain the difference between local plan and national policy.
 - The SPD should refer to the Government's national policy statements on various topic areas.
 - The initial consultation document was hard to understand for those that do not already understand coastal planning jargon.
 - The SPD should provide guidance helping to explain how coastal planning policies will apply to different types of development.

- The SPD should recognise the importance of natural and historic environment and that enabling development, and rollback and relocation development must consider the natural and historic environment, and avoid impacts on such environments.
 - Guidance should be provided on the implementation of flood risk policies.
3. What guidance for development in the Coastal Change Management Area should be identified in the SPD?
 - The SPD should protect buildings and other assets on the coast from being lost to the sea.
 4. Are the categories identified in section 3 appropriate and comprehensive or should others be identified?
 - The SPD should provide guidance relating to the various risk zones added to the CCMA.
 5. What guidance on temporary development within the CCMA should be included?
 - Some suggested temporary development shouldn't be allowed, and others suggested temporary development should form part of a sustainable approach to development on the coast.
 - Some confusion about what would constitute temporary development.
 6. What elements should be included within a Coastal Erosion Vulnerability assessment?
 - There was some confusion as to the role of Coastal Erosion Vulnerability Assessments.
 7. What guidance on Roll-back and relocation options should be included?
 - The SPD should provide information concerning funding sources and compensation for rollback and relocation development.
 - The SPD should provide guidance on the nuances of planning applications for rollback and relocation to ensure policy compliant planning applications are submitted.
 8. What guidance on enabling development should be included?
 - A number of local, national and international coastal adaptation best practice case studies were suggested to be explored.
 9. What case studies should be used in this SPD to demonstrate coastal adaptation best practice?
 - A number of case studies were suggested ranging from locally specific coastal adaptation schemes (such Wood Hill, East Runton rollback and relocation of holiday park lodges), to local schemes for wildlife conservation and habitat creation, large scale energy projects, to coastal adaptation approaches of other nations.
 10. Do you have any other comments which could help the partnership prepare the SPD?
 - The open ended nature of this question resulted a large number of comments covering a large variety of topics and issues, most of which cannot be addressed by the SPD.

Consultation on the Draft SPD

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

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

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

Appendix 1: Consultation bodies

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

Specific consultation bodies

- Environment Agency
- Historic England
- Marine Management Organisation
- Natural England
- Network Rail
- National Highways (at the time Highways England)
- Norfolk County Council
- Suffolk County Council
- Parish and town councils within East Suffolk, Great Yarmouth, North Norfolk, and The Broads and neighbouring parishes
- Neighbouring Local Planning Authorities
- Elected members
- Anglian Water
- Water Management Alliance
- Essex and Suffolk Water
- Homes England
- NHS England
- Ipswich and East Suffolk Clinical Commissioning Group
- North Norfolk Clinical Commissioning Group
- Great Yarmouth and Waveney Clinical Commissioning Group

General consultation bodies

- Voluntary bodies some or all of whose activities benefit any part of the SPD area
- Bodies which represent the interests of different racial, ethnic or national groups in the SPD area
- Bodies which represent the interests of different religious groups in the SPD area
- Bodies which represent the interests of disabled persons in the SPD area
- Bodies which represent the interests of persons carrying on business in the SPD area

Other individuals and organisations

Includes local businesses, high schools, individuals, local organisations and groups, planning agents, developers, landowners, residents and others on the combined mailing list.

Appendix 2: Initial consultation social media posts


Example provided by the Broads Authority and East Suffolk Council:

Broads Authority
@BroadsAuth

A new consultation on the Coastal Adaptation Supplementary Planning Document has been launched today, running until 16 Oct.

At this early stage, we welcome comments from anyone who has an interest in the coast or may be affected by changes to the coast.

broads-authority.gov.uk/about-us/how-w...



Coastal Partnership East and 3 others

14:55 · 04/09/2020 from Earth

East Suffolk Council Planning
@eastsuffolkplan

Initial consultation on the Coastal Adaptation Supplementary Planning Document ends Friday 16 October. Please let us know your views eastsuffolk.inconsult.uk/consult.ti/coa...

17:33 · 08/10/2020 · Twitter Web App



Appendix 3: Initial consultation responses

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

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

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

Respondent	Comment	Partnership Response	Changes Made
	<p>very little of it managed. I would suggest a more clear interaction with SMP. For example will there be a closer examination of the need to defend parts of the coast where the SMP says nothing should be done. Will the resources be available to manage the coastline properly or is the intention just to let everything go?</p>	<p>application of Local Plan policies regarding coastal adaptation.</p>	
<p>Norfolk County Council - Natural Environment Team (Catherine Dew)</p>	<p>We support the Coastal Adaptation Supplementary Planning Document and have the following comments for consideration. The SPD seems to focus on the human impacts. It should also include the ‘natural environment’ – the habitats and species which form the coastal (and marine) environment as the management measures and policies will impact on them and the ecosystem services and recreational use, they provide. They are inextricably linked.</p>	<p>Support welcomed. The SPD will seek to provide guidance on the implementation of coastal planning policies. The SPD will set out the affects that coastal processes and policies can have on coastal ecology (and vice versa), and identify ways in which such impacts can be lessened and ways in which coastal adaptation can best serve the needs of the natural environment.</p>	<p>The SPD emphasises the impacts of coastal processes and planning policies on the natural environment, and provides guidance on ways in which such impacts can be lessened through coastal adaptation.</p>
<p>Blue Sky Leisure (Paul Timewell)</p>	<p>BSL consider the scope and broad of the document to be broadly appropriate. The document should identify the range of business operating along the coast and acknowledge their significant importance to the North Norfolk and wider Norfolk economy, particularly tourism. It should explain that all businesses are different , both in type and size, and the SPD should not treat all business as the same, with certain business such as tourism having very different needs in terms of how planning policy should be applied.</p> <p>The SPD provides the opportunity to introduce some flexibility into the application of Planning Policy dependent on the nature of activity affected. For instance, in terms of the application of the roll back policy, the site requirements for a caravan and camping site are vastly different to a manufacturing business. The SPD should explain the material considerations that could be considered as being appropriate to justify a variation in</p>	<p>The SPD will within its context chapter, set out the affects that coastal processes and policies can have on local businesses, and it is recognised, as stated, that there are a wide variety of different businesses operating on or close to the coast.</p> <p>The SPD cannot introduce ways of interpreting policy, that is the role of the development plan. The SPD will, however, provide guidance on how policy should be applied and some flexibility may be appropriate in certain cases</p> <p>The SPD will present case studies of coastal adaptation best practice. It is not considered necessary to include details of emergency cases:</p>	<p>The SPD sets out the benefits of roll back schemes against the impacts.</p> <p>Appropriate pre-application engagement should be undertaken, but the Local Plans already mention this</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>planning policies dealing with coastal adaptation. It could for example, explain the 'trade offs' that may be acceptable when considering the benefits of roll back schemes against the impacts. The SPD could usefully provide advice on the expectations for public engagement where roll back schemes are proposed.</p> <p>The SPD could usefully include case studies of schemes that are considered exemplars of a successful implementation of coastal adaptation planning policies. The SPD should set out the likely planning response in cases of emergency, for instance where unpredicted/accelerated coastal erosion means businesses have to make rapid reactive decisions as to how best to deal with such circumstances.</p>	<p>these will always be dealt with in a case-by-case basis</p>	
<p>Norfolk County Council - Lead Local Flood Authority (Sarah Luff)</p>	<p>The LLFA have reviewed the Draft SPD Initial consultation document scope and consider the scope and content are appropriate.</p>	<p>Support welcomed.</p>	<p>No change.</p>
<p>Felixstowe Town Council (Ash Tadjrishi)</p>	<p>We agree with the content topic proposed, but believe the wider public would be well served by a section overtly specific to Sea Level Rise, and what an appropriate level may be relevant to be taken into account over a 100 year time scale. We note the figure currently used by the Environment Agency as general guidance is of the order of 0.7m over 100 years.</p>	<p>National Planning Practice Guidance for 'Flood risk assessments: climate change allowances' provides guidance relating to sea level rise, amongst other things. As national guidance can be updated quickly, it is considered more appropriate for sea level rise to be addressed by national guidance and the Environment Agency rather than this SPD.</p>	<p>No change.</p>
<p>J E Blanchflower</p>	<p>Broadly speaking yes, but the SPD will need to be flexible enough to respond to climate change initiatives, many of which have not been devised or enacted. Perhaps the scope should be widened to encompass this.</p>	<p>Coastal change is inherently linked to climate change, and the SPD will seek to provide case study examples of coastal adaptation best practice.</p>	<p>No change.</p>
<p>Andrew McDonald</p>	<p>I am not sure if this is not a statement of the obvious, but perhaps the definition of context in para 1 could be expanded from 'Homes, businesses and communities' to</p>	<p>The SPD will within its context chapter, set out the affects that coastal processes and policies can have on the natural environment.</p>	<p>The SPD sets out the impacts of coastal processes and planning</p>

Respondent	Comment	Partnership Response	Changes Made
	include the environment and biodiversity of the CCMA? Action taken by way or rollback and especially by relocation will inherently offer a threat to areas hosting the relocation, and this should be explicit from the outset. I suggest also that the significance of climate change is not sufficiently reflected in the decision to make coastal change 'inclusive' of climate change, and no doubt the detailed document will address this.	It is recognised that coastal change is inherently linked to and affected by climate change, and the SPD will seek to provide case study examples of coastal adaptation best practice.	policies on the natural environment.
Burnham Overy Parish Council (Sarah Raven)	This has been sent to Burnham Overy Parish Council for recommendations however it only covers half the coastline. Why is this only suitable for this part of the coast from Holkham to Felixstowe?	The SPD covers the coastal areas of North Norfolk District Council, Great Yarmouth Borough Council, The Broads Authority, and East Suffolk Council (the area that the Coastal Partnership East team covers) – but not King's Lynn and West Norfolk, which has its own arrangements. Adjoining parish councils to the SPD area have also been consulted, however, as is standard practice.	No change.
Peter Terrington	More emphasis needed on development in areas of accretion.	The SPD will provide guidance in relation to development within and affecting the CCMA, including areas of accretion, erosion and where the shoreline is reasonably stable.	No change.
Peter Terrington		N/A	N/A
Southwold Town Council (Lesley Beevor)	Scope: section 2 should summarize current mitigation policies, especially in context of those areas where policy is hold-the-line as at Southwold.	The SPD will include a summary of the powers bestowed on coastal authorities and our partners (such as the Environment Agency) as well as policies to manage the coast, including mitigation policies.	No change.
Anglian Water Services Ltd (Stewart Patience)	Consideration should also be given to existing infrastructure located within the area covered by the SPD as follows: • water and water recycling infrastructure provided by Anglian Water and • existing infrastructure including ports within the area and energy generation	The SPD will provide guidance relating to the implementation of coastal planning policies, which will be relevant to existing and planned infrastructure at the coast.	No change.
Barton Willmore (Will Spencer)	NFOWF Ltd supports the objectives for producing the SPD, as identified in Section 1 of the Consultation Document. This includes helping coastal communities to prosper and	Support noted. The SPD does not wish to restrict appropriate development at the coast. However, certain development types will normally be	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>to adapt to coastal change, but to also provide detailed guidance on the interpretation of policies with a whole coast approach. Our client also welcomes and agrees with the statement that the SPD will not: • Create new or amend existing planning policies as this is the role of the Development Plan and National Policy, or • Alter the approach to the management of the coast as this is the role of SMPs.</p> <p>Notwithstanding the above, Section 4 of the Consultation Document states that the SPD will “provide clear guidance as to what development may be appropriate in such areas and in what circumstances”. NFOWF Ltd urges the exercise of caution in the way this statement is interpreted into the draft SPD. There is a risk that an overly restrictive policy will conflict with both of the above objectives and could result in certain development being excluded from certain areas without sufficient evidence to demonstrate that that it would be inappropriate. This should not be the role of planning policy, but rather it should be for developers to make applications for development in an area and for these to include assessments of the impacts on coastal processes and to justify why the proposal is suitable in the area (with regard to proposed mitigation and monitoring measures). To do otherwise could threaten the delivery of developments such as the Project as well as the achievement of national and local policies for increasing the supply of renewable sources of energy and addressing the impacts of climate change. Should the SPD identify the types of development suitable in certain areas (as in the Waveney Development and Coastal Change SPD 2013) then it should state that renewable energy infrastructure should be supported where there is a proposed</p>	<p>inappropriate within the CCMA and this will be set out within the SPD. The policies for determining planning applications will be those of the Local Plan, and any planning application must be treated on its own merits, but the SPD will provide useful advice on how the Local Plan policies will be applied.</p>	

Respondent	Comment	Partnership Response	Changes Made
	management plan to address potential impacts on coastal processes.		
Bidwells (Kate Hammond)	Looking at the 5 points of the SPD, we believe it covers most areas of Coastal change, however, we would like to see more emphasis on traffic management and road infrastructure which is not specifically mentioned with in the summaries. This is vital especially between Sidestrand and Mundesley where coastal erosion is accelerating and will have a huge impact on the existing road infrastructure.	The SPD will provide guidance relating to the implementation of coastal planning policies, which will be relevant to existing and planned infrastructure at the coast, including highways.	No change.
RSPB (Ian Robinson)	<p>Nature conservation interests are frequently combined with built development under the general heading of ‘development’. In order to provide clarity, we suggest where management for interests other than built environment exist, they are categorised and treated separately. This would therefore result in targeted discussions about predicted coastal change impacts on e.g. biodiversity, water and soils as discrete features that could be affected separate from residential properties and commercial and industrial interests.</p> <p>The impacts of each topic area may have similarities but there will also be variation. This would also then lend itself to additional assessments that will need to be undertaken to demonstrate that the proposed SPD will not adversely affect the integrity of terrestrial and marine Natura 2000 sites, as well as other national important sites. This will also enable reference to specific guidance within the National Planning Policy Framework (NPPF) e.g. paras 118, 157.</p> <p>The mitigation hierarchy for developments needs to be clearly set out, emphasising the mitigation and compensation requirements that should be considered. Any mitigation and compensation packages must be based</p>	<p>The SPD will within its context chapter, set out the affects that coastal processes and policies can have on the natural environment.</p> <p>The terminology used within the SPD will categorise the built environment and natural environment separately so as not to underplay the important role of the natural environment and the ways in which it is affected by changes to the coast, whether they be natural or built.</p>	The SPD sets out the impacts of coastal processes and planning policies on the natural environment.

Respondent	Comment	Partnership Response	Changes Made
	<p>on the ecological requirements for the species and habitats affected and may need to consider options for compensation some distance from the point of impact to ensure the most sustainable options are identified. The SPD must also highlight the opportunities for net gain for biodiversity and the environment to be a consideration in coastal adaptation projects.</p> <p>The role that adaptive coastal management plays in maintaining functional coastal habitats needs to be highlighted and the benefits of these habitats for wildlife conservation, flood prevention and in the context of saltmarsh, carbon sequestration. Providing carbon budgets for each proposed option would enable an assessment of sustainability to be made. Proposals should be developed describing creation of compensatory habitat along the coast in response to losses elsewhere. For example, coastal squeeze in the Deben estuary is resulting in unfavourable SSSI condition due to loss of saltmarsh. In areas where managed realignment/no active intervention is the accepted course in the Shoreline Management Plan, this saltmarsh could potentially be restored in a different location, preventing net loss of habitats and potential for overall net gain.</p>		

2. Are there any elements of National or Local Planning Policy which should be particularly emphasised/explained in the SPD?

Respondent	Comment	Partnership Response	Changes Made
esc (beavan)	building in flood plains	The SPD will focus on coastal planning policies, and although flooding can be a coastal issue, the policies governing flood risk are not solely coastal matters. This SPD will therefore not address policies concerned solely with flood risk, other than where	No change.

Respondent	Comment	Partnership Response	Changes Made
		they may affect coastal management and adaptation policies.	
Stu Precious	It's a cop out to just cite existing documents and not summarise the existing policy.	The initial consultation gave respondents the opportunity to influence the proposed content of the SPD. After taking account of consultation responses the Partnership Authorities will draft and consult on the draft SPD.	No change.
Paul Johnson	There is a general feel that the Policy recognises that change is inevitable, and that it is not taken very seriously. The scope appears to be reactive rather than proactive and could be read, as I did, to be investigative, research worthy and able to produce conclusions that have sadly, no teeth. I see little in the document that suggests it will achieve very much - I hope I am wrong and missed something innovative and supportive to those who are closely linked to the coastal strip, both business and leisure.	This SPD will ensure planning guidance is up to date, aid the interpretation and delivery of planning policy, and provide case study examples of coastal adaptation best practice. The SPD cannot create new or amend existing planning policies as this is the role of the Development Plan and national policy.	No change.
Jeffrey Hallett	Long term effects of building Sizewell C and similar future developments. Impact of the many (7) planned offshore energy projects that need infrastructure to come onshore and then have depots, works or power transfer cables etc passing through your countryside with no inter-agency cooperation to mitigate the cumulative effects.	The impacts of specific infrastructure projects will not be discussed, other than where they relate to case studies of coastal adaptation best practice. The SPD will, however, provide guidance relating to implementation of coastal adaptation planning policies.	No change.
Margaret Hallett	The likely long-term effect of the Energy companies planning developments.	The impacts of specific infrastructure projects will not be discussed, other than where they relate to case studies of coastal adaptation best practice. The SPD will, however, provide guidance relating to implementation of coastal adaptation planning policies.	No change.
North Norfolk District Council (Harry Blathwayt)	Roll Back or managed retreat must be emphasised regarding compensation.	Financial "compensation" is not available in roll-back or managed realignment scenarios, but the possibility of any forms of "compensation" (which might perhaps include the right to a plot of land inland in some cases) will be discussed in the SPD.	No change

Respondent	Comment	Partnership Response	Changes Made
Tessa Aston	The continued protection of Landguard Fort, Landguard Common and Cobbold's Point and the Martello Tower at Manor End.	The SPD cannot alter the approach to the management of the coast as this is the role of SMPs.	No change.
Lindsay Frost	Laws governing the littoral zone and offshore areas	The SPD will set out, briefly, the powers bestowed upon coastal authorities and our partners that can be used to manage the coast. The SPD is based upon the principles of Integrated Coastal Zone Management and as such the Partnership Authorities will explore the potential inclusion of laws governing the marine planning system within the SPD.	No change.
Richard Starling	Before doing this consultation, you should await the outcome of the Broadland Futures Initiative. We have very little information on National yet alone Local Planning Policy at this stage and the BFI consultation would have, hopefully, explained this.	This SPD and the Broadland Futures Initiative (BFI) operate within the same topic area, that of coastal change. However, the SPD is very much focussed on providing guidance relating to the implementation of existing planning policies, whereas the BFI is looking to inform the overarching flood risk management strategy for the next 100 years over a much wider area. The SPD and BFI can complement each other, and the SPD need not be restricted by the timings of the BFI.	No change.
Martlesham Sea Wall Group (Thomas O'Brien)	I would like more emphasis on the value of the coast to local communities and tourists for enjoyment. Rather than the public seen as purely a 'disturbance'. See my comments in 10 below.	The SPD will set out the importance of the coast to communities, businesses, and the environment.	No change.
Norman Castleton	I would like to see how this SPD extends or clarifies the criteria and definitions already agreed in the SMPs.	The SPD will provide a glossary of terms but cannot amend definitions set out in the SMPs.	The SPD will contain a glossary of key terms.
Norfolk County Council - Natural Environment Team (Catherine Dew)	The SPD should incorporate the forthcoming Nature Recovery Networks and consideration should be given to re-creating habitats and enabling habitat and species migrations.	The SPD will, set out the affects that coastal processes and policies can have on the natural environment, and also provide guidance relating to habitat creation and enhancement in the context of rollback and relocation approach to coastal adaptation.	No change.
Blue Sky Leisure (Paul Timewell)	An important part of the SPD should be to provide more detailed guidance on the necessary nuances of the	The SPD will provide guidance relating to the implementation of rollback and relocation policies,	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>implementation of Local Plan roll back policies and explain how policies will be applied to different type of businesses. As explained above, what might be an appropriate approach to dealing with the relocation of a tourism business will be different to the approach for manufacturing, particularly in terms of site requirements, location, and attractiveness to visitors. The SPD could explain the expectations for options appraisal, in terms of application of the roll back policies and acknowledge that different business will need a differing site requirement. The SPD should provide guidance and advice on timing/phasing expectations for the implementation of coastal adaptation policies, acknowledging that it may only be viable and practical to implement policies over an extended time period.</p>	<p>and include guidance relating to different uses. While it will be important for the SPD to provide as much useful guidance as possible, it will also be important to balance this with the need to provide concise guidance and allow for flexibility in demonstrably unique circumstances.</p>	
<p>Norfolk County Council - Lead Local Flood Authority (Sarah Luff)</p>	<p>a. The National Policy Statement on Flood Risk and Coastal Change Management should be included within this section as it is expected to strongly influence the policy direction over the coming years. b. Please confirm whether this section will make links to appropriate flood risk policy whether the coastal erosion lead to a change in flood risk?</p>	<p>The SPD will include the National Policy Statement for Flood and Coastal Erosion Risk Management when setting out the policy framework relating to coastal adaptation.</p> <p>The SPD will focus on providing guidance relating to the implementation of coastal planning policies, and will therefore not provide much guidance relating to flood risk.</p>	<p>No change.</p>
<p>Felixstowe Town Council (Ash Tadjrishi)</p>	<p>The governance of Coastal Management, let alone with the inclusion of Adaptation, is complex and very hard for lay people to understand. We believe a section should be included explaining the core principles – as clearly and briefly as possible. E.g. Coastal Management, and as part of that Coastal Adaptation, have emerged as concepts over the past 15 years or so, replacing previous separate approaches for “Flood Protection” in respect of areas liable to tidal flooding and separately “Coast Protection” – protecting higher coastal land from loss by erosion. Land</p>	<p>The SPD will include information relating to the legislative and policy framework for coastal management, as well as a glossary of terms to help explain some of the planning and coastal management jargon often used.</p>	<p>The SPD will contain a glossary of key terms.</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>use planning had traditionally been a separate topic. Four strands of law and regulation cover those issues, with Responsible authorities being: • Flood protection: The Environment Agency (EA) • Coast Protection: District & Unitary LAs, as Coast Protection Authorities (CPAs), under the 1949 Coast Protection Act • Planning; District & Unitary LAs, as Local Planning Authorities (LPAs). • Marine ecology and management (the MMO) Within the Planning section, reference should be made to: • The relevant NPPF sections, particularly paragraph 160(b) – “Developments should be safe for their lifetime.” (our perception of some recent planning applications has been that too much reliance has been given to the sequential test in isolation, without the over-riding “safe” factor of 160(b) • Shoreline Management Plans and their role as a non-statutory evidence base, including the meaning, with examples, of the 3 policy options. Links to relevant documents: NPPF, SMP, role of Estuary and other flood plans.</p>		
J E Blanchflower	<p>Preservation of fragile and diminishing coastal habitats such as salt marshes by strengthening Local Planning Policy to prevent damaging development of any kind (public and private) or activities (e.g. dredging) in areas which are vulnerable or nationally designated. Emphasising the importance of up to date guidance from expert bodies on the long term effects of proposed changes/developments. Planning applications can take a long time between submission, consideration and approval and the coastline may have changed in the interim period, given the acceleration of climate change and extreme weather patterns.</p>	<p>The SPD cannot create or amend planning policy, or provide guidance relating to policy wholly in the marine realm. The guidance contained in the SPD will, we hope, ensure that applications are supported by robust evidence and have been prepared in a manner that can then be more speedily determined.</p>	No change.
Lowestoft Cruising Club (David Bennett)	<p>Not able to comment on the National Planning policies, as not familiar with them. All local East Suffolk Council relevant planning policies should be emphasised and explained.</p>	<p>The SPD will provide guidance relating to the implementation of coastal adaptation policies.</p>	No change.

Respondent	Comment	Partnership Response	Changes Made
Andrew McDonald	The recently extended Suffolk Coasts and Heaths AONB, and the very wide range of protected and designated landscape in East Suffolk, are critical to the life of Suffolk communities, and it would be helpful if the recognition of the importance of Heritage Coasts and AONBs in paras 170-173 of the NPPF is reflected in the SPD, as should be the underlying regulation in the Countryside and Rights Of Way Act 2000. It would also be helpful to note the emphasis on long term planning in the Coastal Management section of the recently adopted Local Plan, especially para 9.39.	The SPD will within its context chapter, set out the affects that coastal processes and policies can have on the natural environment. The long term approach to coastal management, as mentioned within paragraph 9.39 of the Suffolk Coastal Local Plan, will be emphasised within the SPD.	No change.
Peter Terrington	NN: EN 7 & 8	It is assumed the comment relates to policies of the North Norfolk Core Strategy. The SPD will provide guidance relating to the implementation of coastal adaptation policies contained in the North Norfolk Core Strategy, as well as other Development Plan documents across the SPD area.	No change.
SCEG - Scratby and California Environment Group (Lodge)	Adaption options.	The SPD will provide guidance relating to the implementation of coastal adaptation policies.	No change.
Southwold Town Council (Lesley Beevor)	No Comment.	N/A	N/A
Water Management Alliance (Jessica Nobbs)	Paragraph 163 from NPPF allowing development in areas that meet the required criteria with regards to flood risk – push for sustainable development (even though coastal focused). Strong links also need to be made to the tidal estuarine systems critical to catchment scale long term spatial planning. Water Framework Directive, Habitats Directive duties to the environment.	The SPD will focus primarily on guidance relating to the implementation of coastal adaptation policies. However, guidance relating to other policy frameworks may be included where appropriate.	No change.
Deben Estuary Partnership (Christine Block)	The SDP, as set out, omits any reference to a significant element of the Suffolk coastline – the estuaries of the Deben, Alde and Ore and Blythe. Factors influencing change within an estuary cannot be separated or isolated from	The SPD cannot alter the approach to the management of the coast as this is the role of SMPs, and neither can the SPD create new or amend existing planning policies as this is the role of the	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>coastal systems. In acknowledging, as the draft SPD states, that coastal change can be (but is not limited to) erosion, land slip, permanent inundation, or accretion it follows that it is necessary to accept that estuaries (where rates of change, taking account of climate change, may be significant over the next 100 years), are likely to be affected by most, if not all, of the physical changes listed. With particular reference to the Deben Estuary – here both the estuary mouth, influenced by the variable configuration of coastal shingle banks, and the management of defences within the lower reaches of the estuary will be affected by storm surges, damage to and breaching of defence walls and extensive flooding. In order to deliver a coherent, holistic approach to coastal and estuarine management it is therefore necessary to include estuaries within the coastal change management area policy – as set out in the NPPF- Policy, as set out in the National Planning Policy Framework, requires the delineation of the Coastal Change Management Area to be informed by, amongst many other things, Estuary Plans. It is the intention of the Council to expand the boundary and principles of Coastal Change Management Areas to the estuaries of the plan area in order to fully address coastal change along the Suffolk coastline which, by law, extends to the mean low water mark in the estuaries.</p>	<p>Development Plan and National Policy. However, the SPD will provide guidance relating to the implementation of coastal adaptation planning policies.</p>	
<p>Anglian Water Services Ltd (Stewart Patience)</p>	<p>This section should also refer to powers available to adapt the coast, either in line with the Shoreline Management Plan (SMP) or through any subsequent reviews of the SMP to enable additional growth.</p>	<p>The SPD will set out the powers bestowed upon coastal authorities and our partners that can be used to manage the coast, including through the preparation and review of Shoreline Management Plans.</p>	<p>No change.</p>
<p>Barton Willmore (Will Spencer)</p>	<p>The SPD should acknowledge the Overarching National Policy Statement (NPS) for Energy (EN-1) and the NPS for Renewable Energy (EN-3), in terms of the support given to the need for renewable energy infrastructure, including</p>	<p>The SPD will provide guidance relating to the implementation of coastal adaptation planning policies. The SPD will not provide guidance relating to the implementation of National Policy Statements, as</p>	<p>No change.</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>offshore wind. NPS EN-1 states for example: “The UK needs all the types of energy infrastructure covered by this NPS in order to achieve energy security at the same time as dramatically reducing greenhouse gas emissions. It is for industry to propose new energy infrastructure projects within the strategic framework set by Government. The Government does not consider it appropriate for planning policy to set targets for or limits on different technologies. The IPC [now the Secretary of State] should therefore assess all applications for development consent for the types of infrastructure covered by the energy NPSs on the basis that the Government has demonstrated that there is a need for those types of infrastructure and that the scale and urgency of that need is as described for each of them in this Part...” As noted above (under The Project) the policies in the relevant NPS are the principal considerations in the decision-making process for DCO applications, which could mean departures from other policy is justified in certain circumstances. This includes in respect of ‘Enabling Development’ to deliver certain public benefits which is addressed in more detail in the response to Question 8 below.</p>	<p>these relate to the Development Consent Order (DCO) procedure and not to planning applications for which the Local Planning Authority is the determining body.</p>	
<p>Bidwells (Kate Hammond)</p>	<p>As commented above we consider that road re-alignment and traffic management should be properly considered within this document. Existing businesses rely on the existing highway network and therefore this should be properly considered and protected. We consider there should be more emphasis on other development options where land and property are lost or at risk of being lost in the future.</p>	<p>The SPD will provide guidance relating to the implementation of coastal adaptation planning policies. The SPD will not create new or amend existing planning policies as this is the role of the Development Plan and National Policy.</p>	<p>No change.</p>
<p>RSPB (Ian Robinson)</p>	<p>The Statement of Common Ground Shared Aims states: • A holistic and “whole coast” approach will be taken; this recognises coastal change is an inevitable part of a dynamic coast. A naturally functioning coastline is desirable in</p>	<p>The SPD will set out the affects that coastal processes and policies can have on the natural environment, and also to provide guidance relating to habitat</p>	<p>The SPD will set out the importance of the natural environment and the impacts of coastal processes</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>principle but may not be appropriate in every location. • To protect the coastal environment, including nature conservation designations and biodiversity. In Waveney Development and Coastal Change SPD (which is to be replaced by this new SPD): • Although not always possible to replace habitat lost as a result of coastal erosion, the Local Planning Authority will endeavour to protect sites from development that could provide opportunities to recreate habitat close to existing sites. The NPPF makes mention in para 166 of the need for Integrated Coastal Zone management. Within the relevant Shoreline Management Plan's (SMPs) (5, 6 and 7) the style and presentation of information for options is very different making it difficult to assess the connectivity between SMP plans and areas. For example, the importance of longshore drift resulting from cliff erosion. How far the impact of this movement of minerals extends isn't explained and as such how important adopting an option say in SMP 6 is to SMP 7 isn't immediately obvious. Equally, NPPF para 157 and para 163 describe the need to ensure flood risk doesn't get shifted to another location. This is an important consideration given the dynamic nature of this stretch of coast and needs to be appropriately captured in the SPD.</p>	<p>creation and/or enhancement in relation to rollback and relocation coastal adaptation implementation.</p> <p>The SPD will not alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs).</p>	<p>and planning policies on the natural environment.</p>
The British Horse Society (Charlotte Ditchburn)	Yes	Comment noted.	No change.

3. What guidance for development in the Coastal Change Management Area should be identified in the SPD?

Respondent	Comment	Partnership Response	Changes Made
Stu Precious	<p>This exercise seems to be a box ticking exercise. You have not given any clear information and have deliberately obfuscated, to put people off. This is a very serious issue concerning many livelihoods and also SSSI/RAMSAR</p>	<p>The initial consultation gave respondents the opportunity to influence the content of the SPD. After taking account of consultation responses the Partnership Authorities will consult on the Draft SPD.</p>	No change.

Respondent	Comment	Partnership Response	Changes Made
	biodiversity areas, and you make no attempt to explain the current position.		
Paul Johnson	The document lacks a context, and can be read in different ways. After reading it I feel I know very little more than I knew before reading it. I don't know how to answer this question.	This initial consultation gave respondents the opportunity to influence the content of the SPD. After taking account of consultation responses the Partnership Authorities will prepare and then consult on the Draft SPD.	No change.
Jeffrey Hallett	See 2 above.	The impacts of specific infrastructure projects will not be discussed, other than where they relate to case studies of coastal adaptation best practice. The SPD will, however, provide guidance relating to implementation of coastal adaptation planning policies.	No change.
Margaret Hallett	Increased cooperation between companies to ensure the current ad-hoc planning situation where for example Sizewell C and on-shore parts of the wind turbines industry do not appear to be working together to reduce their impact the coast.	The impacts of specific infrastructure projects will not be discussed, other than where they relate to case studies of coastal adaptation best practice. The SPD will, however, provide guidance relating to implementation of coastal adaptation planning policies and will encourage co-operation between different landowners/developers etc.	No change.
North Norfolk District Council (Harry Blathwayt)	All new development in an area likely to be affected by Roll Back should not be able to claim compensation due to flooding or erosion. A realistic valuation of agricultural land not just financially but also its strategic worth to the country.	The partnership authorities will consider whether it is appropriate for the SPD to provide guidance relating to compensation, noting that compensation is not specifically referred to in our planning policies.	Consider providing guidance on compensation and financial assistance relating to roll back or relocation schemes.
Tessa Aston	That the coastline for Felixstowe be maintained as needed with particular reference to those areas of historical, ecological or biological areas. It is essential to protect these areas which also bring people to the town thus supporting local business.	The SPD will not alter the approach to the management of the coast as this is the role of SMPs.	No change.
Lindsay Frost	All guidance should focus on allowing natural processes to find a natural balance, and any human use of the coastal zone should not take place if it is at risk from storm surges or coastal erosion.	Comment noted.	No change.

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

Respondent	Comment	Partnership Response	Changes Made
	licensed caravans (holiday homes); some parks will have a mix. The ability to move caravans and pitches subject to owner licenses is different to fleet caravans. It may be necessary and appropriate for Caravan and Camping sites to relocate development within the same erosion zone/risk epoch (further away from imminent danger) for a period of time, whilst other roll back/relocation options are explored and brought forward.		
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	a. Please include clear guidance on the expectations relating to the need for Flood Risk Emergency Plans (https://www.adeptnet.org.uk/system/files/documents/ADEPT%20%26%20EA%20Flood%20risk%20emergency%20plans%20for%20new%20development%20September%202019....pdf) and the level of detail expected. In line with the direction of the Flood Risk and Coastal Erosion Policy Statement (2020), it could be prudent for guidance to be provided on requesting the applicant to outline their personal and business contingency plans for the short and medium term in relation to flood risk and coastal change Emergency Plans.	The SPD will not create new or amend existing planning policies as this is the role of the Development Plan and National Policy.	No change.
Felixstowe Town Council (Ash Tadjrishi)	The SPD should outline all relevant guidance, not only from Planning documents but also from the EA, LLFAs, MMO, NE, AONB in order to assist applicants and planning officers to consider all cohesively. Reference should be made to the Coastal Concordat.	The SPD will provide guidance relating to the implementation of coastal planning policies, and to other guidance where relevant to the implementation of coastal planning policies.	No change.
J E Blanchflower	Whilst I agree with the wording in Section 3 of the consultation document, the importance of allowing for climate change should be mentioned.	The SPD realises that coastal change is inherently linked to climate change, and will seek to provide case study examples of coastal adaptation best practice.	No change.
Lowestoft Cruising Club (David Bennett)	Seems to be fully covered in the Coastal Adaptation Supplementary Planning Document Initial Consultation, Section 4 Proposed Content of the SPD.	Support noted.	No change.
N/A (Caroline Spinks)	Predictions of risks and longevity of development projects based on modelling of coastal change.	The SPD will provide guidance relating to the implementation of Coastal Erosion Vulnerability Assessments (CEVA).	No change.

Respondent	Comment	Partnership Response	Changes Made
Andrew McDonald	No comment	N/A	N/A
Peter Terrington	Only essential development should be allowed in the coastal fringe. All other development should be encouraged to consider inland locations. Importance of Coastal Concordant for developments which overlap marine and terrestrial environments.	The SPD will provide guidance relating to the implementation of coastal planning policies, but cannot change these Local Plan policies.	No change.
SCEG - Scratby and California Environment Group (Lodge)	Need to clarify any replacement strategy. What future development will be allowed? What type of new dwellings will be allowed in the 100 year plan. Within the CCMA ie will kit houses allowed.	The SPD will provide guidance relating to the implementation of coastal planning policies but cannot change these Local Plan policies	No change.
Southwold Town Council (Lesley Beevor)	May need to reconsider guidance in area of north Southwold and south Reydon, depending on whether mitigation policies are in place.	The SPD will provide guidance relating to the implementation of coastal planning policies, which apply to all areas	No change.
Water Management Alliance (Jessica Nobbs)	The Internal Drainage Boards of the Broads (2006) and East Suffolk specifically would want to be consulted on any potential developments (including both permanent and temporary) within their Internal Drainage District by the relevant Local Planning Authorities. The Board believe this to be important as enabling development may impact on areas where important infrastructure such as Board Adopted Watercourses and Pumping Stations etc are cited. The Board may also have an interest in development that would be subject to its Byelaws (namely Byelaw 10 and Byelaw 3). The Board look to promote sustainable development within the IDD whilst taking into consideration elements such as environmental duties and ecological wellbeing, therefore having sight of potential developments that would impact on our IDD is important. CCMA should cover whole tidal flood risk zones to ensure catchment scale long term special planning to prevent inappropriate development now that will increase the cost of later enforced adaption from forecast sea level rise.	The Councils will ensure that the IDBs are being consulted on relevant applications The SPD cannot not alter the CCMA as this is the role of Local Plans and SMPs.	No change

Respondent	Comment	Partnership Response	Changes Made
Deben Estuary Partnership (Christine Block)	No Comment	N/A	N/A
Anglian Water Services Ltd (Stewart Patience)	The focus appears to new development proposals and public realm infrastructure only. As set above there is a need to consider the existing infrastructure managed by Anglian Water as well any future investment in the area to serve our customers.	The SPD will provide guidance relating to the provision of infrastructure within and adjacent to the CCMA.	No change
Barton Willmore (Will Spencer)	No Comment	N/A	N/A
Bidwells (Kate Hammond)	All proposed new development ideas should be consulted and worked in partnership with local planning authorities. Guidance should be prepared using two-way communication between local authorities and other stakeholders to prevent any unnecessary extra cost on pre-application plans.	The Partnership Authorities will consult on the Draft SPD, when prepared. In relation to potential planning applications, the pre-application charging process is available and recommended	No change.
RSPB (Ian Robinson)	There needs to be clarity on the boundaries of the CCMA to understand how this relates to the wider SMP area, including the stretch of coast to Holkham, within the SPD. Documentation indicates the CCMA relates to Trimley Marshes and no other specific sites within the zone being considered, however the greatest rate of annual loss of land centres around the Benacre area. Any changes must be sustainable and demonstrate that any impacts on the environment will be avoided or minimised.	The CCMA is identified and mapped in the Suffolk Coastal, Waveney, and Great Yarmouth Stage 1 and emerging Stage 2 Local Plans Policies Maps. The CCMA (labelled the Coastal Erosion Constraint Area) for North Norfolk is identified on the North Norfolk Local Plan proposals map. The SPD cannot alter the CCMA as this is the role of Local Plans and SMPs.	No change.
The British Horse Society (Charlotte Ditchburn)	Guidance for development in the Coastal Change Management Area should include guidance regarding access, including the BHS leaflet for developers and planners enclosed with this letter. A document such as the 'Equestrians in Hampshire – a reference guide for Transport, Planners, Developers and other decision makers' mentioned below should be developed for each county and used for Norfolk and Suffolk. At very minimum developers should be aware of their duties regarding	Comment noted. The SPD will set out the powers bestowed upon coastal authorities and our partners that can be used to manage the coast, and coastal management policies and guidance established in Local Plans and national policy.	No change.

Respondent	Comment	Partnership Response	Changes Made
	'Public Rights of Way affected by coastal and estuarine change or management' provided by Suffolk County Council at: https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/rights-and-responsibilities/public-rights-of-way-affected-by-coastal-and-estuarine-change-or-management/ .		

4. Are the categories identified in section 3 appropriate and comprehensive or should others be identified?

Respondent	Comment	Partnership Response	Changes Made
Stu Precious	Tell people the proposals not just the methodology of the consultation.	The initial consultation gave respondents the opportunity to influence the content of the SPD. After taking account of consultation responses the Partnership Authorities will prepare and consult on the Draft SPD.	No change.
Paul Johnson	This is confusing - section 3 does not identify any categories, however section 4 does and they appear appropriate.	Support noted. The question should have referred to section 4.3.	No change.
Jeffrey Hallett	Need to define what is meant by the "eastern half" of the coastal coastal authorities. Does this include Pettistree?	The SPD will not be relevant to Pettistree as it only relates to the immediate coastal area	No change.
Margaret Hallett	The width of the "coastal band" is not sufficiently defined. Is it allied to height above sea level or settlements?	The initial consultation document does not refer to a "coastal band", but the SPD will cover the areas at potential risk of being affected by coastal erosion within the next 100 years.	No change.
North Norfolk District Council (Harry Blathwayt)	I think they are wide ranging enough to cover the bases.	Support noted.	No change.
Tessa Aston	How to maintain the beach should the water level rise. Is there sufficient protection in place for the houses and proposed businesses at Manor End. Contingency plan should the sea breach the wall, to what extent have the tides been affected since last review. Has the 100 year erosion plan stayed true or have matters accelerated.	The SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs).	No change.

Respondent	Comment	Partnership Response	Changes Made
Lindsay Frost	Not sure which 'section 3' is meant here? If it is the a, b, c bit then also d Offshore development e Vulnerability to storm surge flooding	Offshore development will be a matter for the marine planning regime to deal with and therefore guidance on marine development cannot be provided within the SPD. The primary focus of the SPD is providing guidance relating to the implementation of coastal adaptation planning policies, rather than flood risk planning policies.	No change
Richard Starling	We do not know as we have not had sufficient information yet.	Comment noted – more details will be included in the draft SPD	No change.
Norman Castleton	Sites of special geographic, historical, heritage, scientific, natural & geological interest.	The categories identified in section 4.3 relate to types of development within the CCMA, as well as guidance relating to Coastal Erosion Vulnerability Assessments. The SPD will provide specific guidance relating to geological or heritage sites, but will touch on these areas where relevant to the implementation of the coastal planning policies.	No change.
Blue Sky Leisure (Paul Timewell)	The SPD should acknowledge that some development will be seasonal and may require a different approach to the application of planning policy. For instance, works associated with Caravan and Camping parks may be best implemented 'out of season' to minimise economic impacts, which may affect time limits on decision notices. There should also be recognition of viability issues associated with roll back implementation, arising from the removal and relocation of services as well as caravans. This is a costly process, particularly if it results in loss of income while the roll back is taking place.	Comment noted. The SPD will provide guidance relating to roll back and relocation options and camping and caravan sites will be subject to consideration, given their significance to the local economy.	No change.
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	a. Most likely, although it would be helpful to see a breakdown of the contents for these section in order to provide any meaningful feedback.	Comment noted. When prepared the draft SPD will be consulted on, providing interested parties with the opportunity to comment on the detail of the SPD.	No change.

Respondent	Comment	Partnership Response	Changes Made
Felixstowe Town Council (Ash Tadjrishi)	The CCMA headings are appropriate. However, the LP rightly allows for Erosion Vulnerability Assessments to be required in certain locations in HTL areas. That should be explained, with examples. Other similar issues, e.g. the 30m Access Zones should be explained, whether in this section or perhaps better in a section dedicated to adaptation in HTL areas.	Comment noted. Guidance related to Coastal Erosion Vulnerability Assessments shall be explored, as with the application of such assessments in HTL areas.	Provide guidance related to the implementation of Policy SCLP9.3 with regard to the 30m zone landward of the CCMA.
J E Blanchflower	Add 'd. Respect for nationally designated areas such as AONBs, SSSIs, National Nature Reserves which should not be developed or subjected to damaging intervention'	The categories identified in section 4.3 relate to types of development within the CCMA, as well as guidance relating to Coastal Erosion Vulnerability Assessments. The SPD will not provide guidance relating to nature conservation or environmental designations, other than where relevant to the implementation of the coastal planning policies. Other Local Plan and NPPF policies cover development potentially affecting nationally designated areas.	No change.
Lowestoft Cruising Club (David Bennett)	Not sure if this question refers to 3. Links to Shoreline Management Plans (SMPs), or 4.3 Development in the Coastal Change Management Area.	Comment noted. The question should have referred to section 4.3.	No change.
Andrew McDonald	Yes, although '...development which could have adverse impacts on coastal erosion, coastal processes and vulnerability elsewhere...' could be expanded upon - is the 'vulnerability' strictly limited to coastal change?	Comment noted. The SPD will provide guidance relating to the implementation of coastal planning policies. Vulnerability, as referenced in the initial consultation document is referring to coastal erosion and coastal processes.	No change.
Peter Terrington	Yes but more emphasis need on the impacts of development in areas of accretion. See 10 below.	The identification of the CCMA extent takes account of coastal accretion. The SPD will provide guidance relating to development within the CCMA.	
SCEG - Scratby and California Environment Group (Lodge)	Clarification of use of land within the CCMA Commercial usage.	Commercial development will be covered under 'permanent and temporary development on the Coast'.	No change.
Southwold Town Council (Lesley Beavor)	Ok	Comment noted.	N/A

Respondent	Comment	Partnership Response	Changes Made
Water Management Alliance (Jessica Nobbs)	Development should have regard and ideally positively identify future role back for the freshwater environment requirements also. The natural landscape has huge economic and wellbeing value but is taken for granted currently. Given the long lead in times to create high biodiversity potential advanced build programmes would also be desirable. Bio-diversity offsetting payments through the planning process	The SPD will within its context chapter, set out the affects that coastal processes and policies can have on the natural environment. However, the guidance provided will primarily focus on the implementation of the coastal planning policies (i.e. development-related).	No change.
Deben Estuary Partnership (Christine Block)	No Comment	N/A	N/A
Anglian Water Services Ltd (Stewart Patience)	This section should highlight that any roll-back options need to be agreed in collaboration with the asset owners and be realistic about timescales for moving/changing any significant infrastructure. Should you have any queries relating to this response please let me know.	Comment noted. The SPD will highlight the need for collaboration with land and asset owners in discussing roll back and relocation options.	Highlight the need for collaboration with asset owners in agreeing roll back and relocation options.
Barton Willmore (Will Spencer)	No Comment	N/A	N/A
Bidwells (Kate Hammond)	We believe compensation opportunities should be identified, especially for land managers/owners where livelihoods are affected by coastal erosion and where roll back or new development is not feasible. We also believe that enabling development opportunities should be considered within the document, such as where agricultural land or property is lost or at risk of being lost in the short term other development options may be considered more favourably to enable businesses to diversify and continue / remain economically viable. This will maintain existing employment and potentially create future employment opportunities.	Financial compensation for loss of land due to erosion is not something currently allowable and the SPD cannot alter that. The SPD will provide guidance relating to enabling development and the councils take a flexible approach but cannot create new policy.	No change.
RSPB (Ian Robinson)	We presume this question refers to the categories set out in Section 4, not section 3 as described in the initial consultation guidance document? As described in our comments to question 1, the RSPB advocates	The SPD will within its context chapter, set out the affects that coastal processes and policies can have on the natural environment.	Emphasise the impacts of coastal processes and planning policies on the

Respondent	Comment	Partnership Response	Changes Made
	differentiating between development for the purposes of nature conservation to maintain (and indeed improve) conditions for biodiversity, and separately covering development for other purposes e.g. built environment. This will help in judging and clarifying proposals when using guidance from NPPF para 157 (sequential and exception tests)	The terminology used within the SPD will categorise the built environment and natural environment separately so as not to underplay the important role of the natural environment and the ways in which it is affected by changes to the coast, whether they be natural or built.	natural environment (and vice versa). Use terminology carefully and avoid using 'development' to refer to the built and natural environments.
The British Horse Society (Charlotte Ditchburn)	The 3 categories are appropriate.	Support noted.	No change.

5. What guidance on temporary development within the Coastal Change Management Area should be included?

Respondent	Comment	Partnership Response	Changes Made
Stu Precious	What proposed measures are currently in place and what is proposed to improve on that. This is just rubbish.	The initial consultation gave respondents the opportunity to influence the content of the SPD. After taking account of consultation responses the Partnership Authorities will write and consult on the Draft SPD.	No change.
Paul Johnson	Section 3 subsection 3 is beyond the scope of the typical non-expert reader to answer.	The initial consultation document was written in a manner that used plain English as much as possible, however some questions inevitably have to cover more complicated and technical grounds than others.	No change.
unite the union (Robert Riley)	fishing	While the SPD will pursue Integrated Coastal Zone Management to ensure effective alignment of the terrestrial and marine planning regimes, the SPD cannot provide guidance relating to policies set out in Marine Plans.	No change.
Jeffrey Hallett	"Temporary" needs to be defined. The 10 to 12 year construction time of Sizewell C is not temporary. For many it will be the rest of a lifetime!	The SPD will provide guidance relating to temporary development, including the time limits that should be applied to such development. The Sizewell C application has been approved under the national	No change.

Respondent	Comment	Partnership Response	Changes Made
		infrastructure regime. Whilst the construction will be temporary, the buildings themselves will be permanent, of course	
Margaret Hallett	What is "temporary" ? For example the negative effect of the 'temporary' (project 12 year) development of Sizewell C on the local community in terms of property value, tourist blight etc. will be life-changing for many locals.	The SPD will provide guidance relating to temporary development, including the time limits that could/should be applied to such development (which will be variable, depending on a range of circumstances).	No change.
North Norfolk District Council (Harry Blathwayt)	I would like a. To include Temporary Holiday Sites as an important issue as the previous 28 day allowance has increased to 56 days. As I have a massive site in an AONB in my ward I am very aware of the implications impacting all aspects of coastal life. Human and all forms of wild life and sand dune erosion.	Guidance in respect of criterion a. (of section 4.3 of the initial consultation document) will relate to temporary holiday sites. The 56-day allowance has now been returned to 28 days post-Covid	No change.
Tessa Aston	A regular review of the tides, climate change and how this will affect the shoreline and beach.	The SPD will not alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs). Coastal Erosion Vulnerability Assessments (CEVA) will be required in support of certain planning applications for development within the CCMA.	No change.
Lindsay Frost	Any temporary developments should not interfere with natural processes and should not be placed in areas at risk from storm surge flooding or coastal erosion.	Comment noted; however, some temporary developments can be appropriate in areas at risk from erosion and/or flooding. These are obviously very fact- and location-specific. The SPD will provide guidance on this matter	No change.
Richard Starling	Inform people that we have too many organisations making recommendations so best wait until things have been sorted with the BFI consultation.	This SPD and the Broadland Futures Initiative (BFI) operate within the same topic area, that of coastal change. However, the SPD is very much focussed on providing guidance relating to the implementation of planning policies, whereas the BFI is looking to inform the overarching flood risk management strategy for the next 100 years over a much wider area. The SPD and BFI can complement each other, and the SPD need not be restricted by the timings of the BFI.	No change.

Respondent	Comment	Partnership Response	Changes Made
Norman Castleton	No more caravan sites, no more static accommodation sites and as little development of any nature on the coastline as possible.	Comment noted, but Local Plan policies allow some (appropriate) new development/re-development in the coastal zone, although most forms of permanent new development (such as housing) are unlikely to be granted consent	No change.
Blue Sky Leisure (Paul Timewell)	The SPD should acknowledge that some temporary development may be necessary within the CCMA as part of a wider roll back proposal, to ensure continuity and viability of affected businesses. There may therefore be a need for temporary development in the high-risk zone to facilitate a successful roll back process.	This may be correct and the SPD will explore this point in more detail	No change.
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	a. A definition of what is considered to be temporary development in relation to the CCMA. We need to see a definition before identifying what guidance we would recommend. In addition, would temporary works/development include site compounds / material storage area / haul roads etc? If so some form of FRA and temporary drainage strategy would need to be considered. The same LLFA guidance as for permanent developments would apply.	The SPD will provide a definition for temporary development and this could include site compounds etc (if relevant)	No change.
Felixstowe Town Council (Ash Tadjrishi)	No comment	N/A	N/A
J E Blanchflower	Legally enforceable time limits, consideration of disturbance to the status quo, impact on the landscape, vulnerability in fragile areas, access routes.	The SPD will provide guidance relating to the implementation of Local Plan coastal planning policies, including in relation to time limits.	No change.
Lowestoft Cruising Club (David Bennett)	Only essential temporary developments should be included, e.g. temporary flood and erosion prevention measures.	Comment noted. The SPD will provide guidance relating to what development might be appropriate within the CCMA and in what circumstances but cannot replace or update Local Plan policy which covers this matter.	No change.
N/A (Caroline Spinks)	Predictions of risks based on modelling of coastal change.	Comment noted – the extent of the Coastal Change Management Areas are assessed in the production of Shoreline Management Plans (SMPs)	No change.
Andrew McDonald	No comment	N/A	N/A

Respondent	Comment	Partnership Response	Changes Made
Peter Terrington	Applications should be considered against impacts on the environment.	Planning applications are considered against impacts arising from the proposed development on the environment, amongst other things.	No change.
SCEG - Scratby and California Environment Group (Lodge)	What sort of structure would be allowed for this? ie kit houses, caravan sites or commercial enterprises.	The SPD will provide clear guidance as to what development may be appropriate in such areas and in what circumstances, building on the relevant Local Plan policies.	No change.
Southwold Town Council (Lesley Beevor)	No Comment	N/A	N/A
Water Management Alliance (Jessica Nobbs)	Duration of temporary development and its location. What effects development may have on infrastructure that the Board have an interested in and how these temporary works will be implemented and removed pre and post development. Widest sense should encourage green build low construction footprint	The SPD will provide guidance relating to time limits and the implementation and removal of temporary development.	No change.
Deben Estuary Partnership (Christine Block)	No Comment	N/A	N/A
Anglian Water Services Ltd (Stewart Patience)	No Comment	N/A	N/A
Barton Willmore (Will Spencer)	No Comment	N/A	N/A
Bidwells (Kate Hammond)	We believe approximate scientific time scales should be considered as part of the document and these should be reviewed as part of the development of this document.	The SPD will provide guidance relating to time limits of development, but the latest scientific evidence on sea-level rise, climate change etc and implications for planning and environmental policy is produced by Defra, DHLUC and the Environment Agency; the SPD therefore cannot alter these parameters	No change.
RSPB (Ian Robinson)	As described above in our comments related to Q3 the CCMA needs to be defined accurately. Any temporary development should only be considered as part of the staging process to move from the existing	The SPD will not alter the CCMA as this is the role of Local Plans and SMPs. The SPD will also not alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs).	No change.

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

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

Respondent	Comment	Partnership Response	Make Changes
esc (beavan)	height above sea level, geology, likelihood of funding for defences	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
Stu Precious	Property assessments Biodiversity assessments. Erosion Timescale assessments. Best practice audits. Hold the line v managed retreat. Budgetary impact assessments. Economic impact assessments. Long term Impact assessments.	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
unite the union (Robert Riley)	none	N/A	N/A
Jeffrey Hallett	Short and long term effects and the impact on both everyday life and tourism.	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
Margaret Hallett	The effect on people's every-day existence and longer term well-being	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
North Norfolk District Council (Harry Blathwayt)	Sand dredging at sea, particularly in the Yare alluvial basin off Great Yarmouth. I can not find definitive research on the impact on beaches to the north of this activity.	While the SPD will pursue Integrated Coastal Zone Management to ensure effective alignment of the terrestrial and marine planning regimes, the SPD cannot provide guidance relating to policies set out in Marine Plans or proposals governed under the marine planning regime, unless such proposals overlap with the terrestrial planning regime. A report on Hemsby coastal erosion produced by consultants Jacobs for Great Yarmouth Borough Council in 2018 may be of interest but to summarise, there is little or no evidence that modern offshore dredging has any effect on beach levels.	No change.

Respondent	Comment	Partnership Response	Make Changes
Tessa Aston	Whether the 100 year erosion line is still valid; is there need for further groynes; are the groynes in the best place still and is there a need to adjust their height in view of recent tide levels; with recent developments is the flood protection still appropriate for the area; what is the likely impact on geological and biological features and how has this changed	The SPD cannot create or amend policies concerning the future protection of specific stretches of coast as this is the role of the Shoreline Management Plan.	No change.
Lindsay Frost	Historic and predicted rates of erosion. Isostatic adjustment rates. Sea level rise rates. Potential loss of human life. Potential financial losses. Cost-benefit analyses of current flood and erosion defences. Wider impact of current coastal erosion and flood defences.	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
Richard Starling	A promise not to levy any fees or charges or indeed make a Coastal Erosion Vulnerability assessment compulsory for planning applicants. We have enough hoops to jump through now without more pointless assessments.	Coastal Erosion Vulnerability Assessments are required for certain development types within specified areas, as adopted through Local Plans. The SPD cannot alter the need to prepare CEVAs, but instead seeks to provide guidance in order to aid applicants in the preparation of CEVAs.	No change.
Norman Castleton	Economically important, naturally important, special scientifically important	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
Blue Sky Leisure (Paul Timewell)	The SPD should explain the role of Coastal Erosion Vulnerability Assessments, the circumstances in which they may be applicable to outweigh the shore line management plan, the weight that can be attributed to them in the consideration of development proposals, their expected content and technical work needed to underpin them and any expectations/requirements for Council and public engagement.	The SPD provides guidance relating to the role of Coastal Erosion vulnerability Assessments, the circumstances in which they may be required, the consideration and level of detail required in their preparation. The weight that can be attributed to a Coastal Erosion Vulnerability Assessment would be a matter for the decision maker, and cannot be prescribed in the SPD.	No change.
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	a. Description of the existing site and current day site conditions; b. Description of the proposed development; c. Description of the existing and future coastal erosion risk (including the impacts of climate change; d.	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.

Respondent	Comment	Partnership Response	Make Changes
	<p>Assessment of the current and future rate of erosion; e. An estimation of when the development is likely to be directly and indirectly compromised by coastal erosion and how this is likely to occur; f. Consideration of the potential change of flood risk posed due to coastal change; g. Consideration of the risk management measures that would be in place for the short, medium and long term scenarios; h. Description of what the applicants personal/business contingency plans for the short, medium and long term in relation to coastal change. i. An emergency plan for developments directly on the coastline.</p>		
<p>Felixstowe Town Council (Ash Tadjrishi)</p>	<p>The local geology, and erosion history, should be required to be investigated, with appropriate evidence bases.</p>	<p>Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.</p>	<p>No change.</p>
<p>J E Blanchflower</p>	<p>The effects of climate change and extreme weather patterns, whether erosion is compensated by deposition in another part of the coastline, allowing natural processes to take place rather than attempting to resist change with expensive and often unsightly defences.</p>	<p>Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.</p>	<p>No change.</p>
<p>Lowestoft Cruising Club (David Bennett)</p>	<p>Predicted global sea level rises and adverse weather events as a result of the climate emergency. Effect of unregulated use of upper Blythe estuary by speedboats, jet skis causing erosion, loss of habitat for nesting birds at certain times of year, disruption of emerging seal colony'</p>	<p>Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.</p>	<p>No change.</p>
<p>Andrew McDonald</p>	<p>No comment</p>	<p>N/A</p>	<p>N/A</p>
<p>Peter Terrington</p>	<p>Cost benefit analysis.</p>	<p>Consideration has been given to whether the proposed factor should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.</p>	<p>No change.</p>
<p>SCEG - Scratby and California</p>	<p>Time scale The demographics of the community Options for assessment of vulnerability</p>	<p>Consideration has been given to whether the proposed factors should form part of a Coastal Erosion</p>	<p>No change.</p>

Respondent	Comment	Partnership Response	Make Changes
Environment Group (Lodge)		vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	
Southwold Town Council (Lesley Beevor)	No Comment	N/A	N/A
Water Management Alliance (Jessica Nobbs)	No comments	N/A	N/A
Deben Estuary Partnership (Christine Block)	The Planning Practice Guidance provides the following advice on what a Coastal Change Vulnerability Assessment would need to demonstrate: “In considering the requirements of the National Planning Policy Framework a vulnerability assessment might demonstrate that the development: would not impair the ability of communities and the natural environment to adapt sustainably to the impacts of a changing climate; will be safe through its planned lifetime, without increasing risk to life or property, or requiring new or improved coastal defences; would not affect the natural balance and stability of the coastline or exacerbate the rate of shoreline change to the extent that changes to the coastline are increased nearby or elsewhere.	The SPD will be consistent with national policy and guidance.	No change.
Anglian Water Services Ltd (Stewart Patience)	No Comment	N/A	N/A
Barton Willmore (Will Spencer)	No Comment	N/A	N/A
Bidwells (Kate Hammond)	The elements that is causing the erosion whether it is surface drainage, underground springs, increasing sea levels, poor or unmanaged defences.	Consideration has been given to whether the proposed factors should form part of a Coastal Erosion vulnerability Assessment, and relevant guidance is provided in chapter 4 and appendices.	No change.
RSPB (Ian Robinson)	There should be a section in the proposed content on ‘Working together to ensure a coherent network of designated coastal habitats is maintained through	Comment noted. However, the SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs).	No change.

Respondent	Comment	Partnership Response	Make Changes
	<p>adaptive coastal management on a dynamic coastline.’ The approach presented within SMP 6 should be applied to SMP 5 and SMP 7. This clearly sets out predicted lines where the coast will be in the three epochs. Vulnerability will presumably change over time as erosion occurs and so an iterative approach will need to be adopted and options reviewed. Conflict will exist in valuation of property versus land versus legal status. Irrespective early planning must take place with opportunity mapping to define where housing and transport infrastructure will need to be placed, where freshwater habitats will need to be recreated, where non-designated land will need to be (if deemed appropriate and feasible) recreated well in advance of permanent change. A piecemeal approach will not be appropriate and must be based on a community, a business/facility, a discreet area of land.</p>		

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

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

Respondent	Comment	Partnership Response	Changes Made
	<p>and women, located around the coast of mainland Britain. All stations carry out the same task, which is to assist Her Majesty's Coast Guard in their task of helping people in trouble, on or near the sea. HM Coastguard recognises the worth of coastal surveillance stations and many, including ours at Pakefield, hold "Declared Facility Status" which means that they are recognised as contributing to the safety of life by operating a coastal station. Pakefield Coastwatch is responsible to HM Coastguard and operates from approximately Lowestoft Harbour to the village of Kessingland, and as far out to sea as visibility allows. Pakefield Coastwatch is a charity registered with the Charity Commission for England and Wales. I think that what Pakefield Coastwatch does is very important and should be taken into consideration when Roll-back and relocation options are discussed, taking note of its contributions to the safety of people on or near the sea. It is also part of the history of this coastline and should be preserved.</p>		
Jeffrey Hallett	<p>Insistence on proper public planning consent and not imposition by a Secretary of State.</p>	<p>The SPD cannot alter the decision-making procedure, as this is the role of planning legislation.</p>	<p>No change.</p>
Margaret Hallett	<p>to insist on Effective planning control by the local authority not over-ruled for so-called National importance issues</p>	<p>The SPD cannot alter the decision-making procedure, as this is the role of planning legislation. Nationally Significant Infrastructure Projects follow a separate planning process, with the final determination on these made by the relevant Secretary of State.</p>	<p>No change.</p>
North Norfolk District Council (Harry Blathwayt)	<p>This is dependant the scale of any Roll Back or managed retreat. Again this is likely to impact my ward as it includes Horsey, Waxham, Sea Palling, Hickling, and Potter Heigham. As any examination of the map will show the ward is almost entirely coastal and river flood plain 3. Large areas are dependant on Coastal and Broads National Park economy. What measures will be put in place to</p>	<p>The SPD will not alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs).</p>	<p>No change.</p>

Respondent	Comment	Partnership Response	Changes Made
	protect the more substantial settlements What wild life mitigation will be required in turning the area to salt wet lands from the present fresh water and marsh areas. The need of infrastructure to reduce salt incursion to the whole of the Broads Northern River System.		
Tessa Aston	Is there an existing plan should the need to relocate residents or structures of national importance due to climate change/higher tides.	The management of different sections of the coastline is set out in the Shoreline Management Plans (SMPs). The SPD will not alter the approach to the management of the coast as this is the role of SMPs.	No change.
Lindsay Frost	See the Pathfinder Pilot Project feedback from Happisburgh (North Norfolk) (see the excellent(!) chapter on coasts (pp 116-169) in Edexcel AS/A level Geography Book 1 published by Pearson).	The Partnership led on the Happisburgh project and so is well aware of it and it will feature as a case study in the SPD	No change.
Richard Starling	Await outcome of the Broadland Futures Initiative before we know in detail about relevant options.	This SPD and the Broadland Futures Initiative (BFI) operate within the same topic area, that of coastal change. However, the SPD is very much focussed on providing guidance relating to the implementation of planning policies, whereas the BFI is looking to inform the overarching flood risk management strategy for the next 100 years over a much wider area. The SPD and BFI can complement each other, and the SPD need not be restricted by the timings of the BFI.	No change.
Norman Castleton	Roll back should be a last resort and not as an excuse not to spend any money. The full consequence of roll back should be assessed e.g. the effects on the hinterlands including the marchlands of Broadland.	Rollback is part of the suite of options available to manage the coastline but any decision on rollback will primarily be made through the SMPs and Local Plans. All implications are carefully considered and the SPD will provide guidance on rollback	No change.
Blue Sky Leisure (Paul Timewell)	The SPD should acknowledge that the application of the roll-back and relocation policy will be different for different types of business, and the site-specific opportunities and requirements will vary. The scope of the options appraisal should be set out and include advice on expectations for	The SPD will provide guidance relating to the implementation of rollback and relocation planning policies and it is recognised that different approaches will be necessary for different situations	No change.

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

Respondent	Comment	Partnership Response	Changes Made
Peter Terrington	cost benefit analysis and investigation of sources of funding for inducements to homes and businesses to relocate inland	Comment noted. Decisions on rollback are rarely straightforward	Detail potential funding streams available to rollback and relocation proposals.
SCEG - Scratby and California Environment Group (Lodge)	Identifying land or sites appropriate for future roll-back use. As much detail as possible to guide the local authorities on what can be done. At what stage to allow action on policy	The SPD cannot identify land for development, for future rollback or relocation, as this is the role of the Development Plan but will provide guidance on rollback	No change.
Southwold Town Council (Lesley Beevor)	No Comment	N/A	N/A
Water Management Alliance (Jessica Nobbs)	Relocation options should consider if locations are to be within or near to one of the Internal Drainage Boards and associated infrastructure. Re-location may require adhering to the Boards Byelaws depending on the scope of development. Ideally an agreed catchment scale spatial plan should identify preferred “roll to” long term sustainable locations. Guidance should be fit a single property through to whole communities.	Comment noted. The SPD cannot identify land for development, for future rollback or relocation, as this is the role of the Development Plan. The SPD can however provide guidance relating to important considerations for rollback and relocation proposals.	No change
Deben Estuary Partnership (Christine Block)	No Comment	N/A	N/A
Anglian Water Services Ltd (Stewart Patience)	No Comment	N/A	N/A
Barton Willmore (Will Spencer)	No Comment	N/A	N/A
Bidwells (Kate Hammond)	Authorities and stakeholders to work in partnership to assess the needs of the opportunities available. We believe there should be a sensible look at areas for relocation/rollback and a more sympathetic planning partnership with local Parishes to allow businesses/Individuals to progress with bringing prosperity into their specific area. As stated above we also believe that enabling development opportunities should be	Comment noted. The SPD cannot identify land for development, for future rollback or relocation, as this is the role of the Development Plan. The SPD will provide guidance relating to enabling development, but again cannot create or modify existing policy.	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>considered within the document, such as where agricultural land is lost other development options may be considered more favourably to enable businesses to diversify and continue / remain economically viable. Enabling development can be included to cover the additional costs of replacing assets which are lost. This will maintain existing employment and potentially create future employment opportunities.</p>		
<p>RSPB (Ian Robinson)</p>	<p>Comments mentioned in response to question 6 are also relevant. Compensation and other costs should be factored in. Within SMP's 5 and 7 significant areas of low-lying coastal habitat fall within Flood Zone 2, suggesting change within Epoch's 1 and 2. SMP 5 shows maps of adaptive measures i.e. relinquishing land currently freshwater to brackish/salt, whereas SMP 7 merely shows Flood Zone categorisation. In addition, within the options described in SMP7 the position describing retention of biodiversity status quo is invalid. The biodiversity value of brackish and saltwater habitats cannot be compared like for like with freshwater habitats as each supports a different range of species. If the prediction is freshwater habitats will be lost in allowing natural processes to occur to benefit the whole focus area covered by the SPD, then these habitats need to be recreated to sustain wildlife dependent on the biotic parameters found within these habitats. Significant areas of low-lying coastal marsh will inevitably be lost and as has been shown in North Norfolk replacing this habitat type may only be possible some considerable distance away. Have relocation zones been earmarked where not only the type of the habitat but also the scale (i.e. hundreds of hectares) been identified? Resolving this issue is likely to be much harder (but no less important) than relocating a household or a business threatened from coastal change, and recognition needs to given to the time needed to</p>	<p>The Partnership will explore the opportunity to provide guidance relating to compensation.</p> <p>The SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs). The SPD also cannot identify land for rollback and relocation of natural habitat or built development as this is the role of the Development Plan, or for development proposals to demonstrate through planning applications. IT does, however, encourage the consideration of habitat (re)creation</p>	<p>Consider providing guidance relating to compensation and other financial assistance for coastal adaptation projects.</p>

Respondent	Comment	Partnership Response	Changes Made
	create a quality replacement, not just to finding an equivalent area of land. It will likely be that the location for replacement habitats may well fall outside of the relevant SPD area and even planning authority areas for example inland into the Cambridgeshire fens.		
The British Horse Society (Charlotte Ditchburn)	Developers should be provided with information about diverting Public Rights of Way provided by Norfolk County Council at: https://www.norfolk.gov.uk/out-and-about-in-norfolk/public-rights-of-way/public-path-orders#:~:text=The%20Council%20has%20a%20power,Bridleways%20or%20Restricted%20Byways%20respectively. And by Suffolk County Council at: https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-and-planning/ / http://www.suffolkpublicrightsofway.org.uk/home/making-changes-to-the-public-rights-of-way-network/	Comment noted. The SPD will set out the powers bestowed upon coastal authorities and our partners that can be used to manage the coast, and coastal management policies and guidance established in Local Plans and national policy.	No change.

8. What guidance on enabling development should be included?

Respondent	Comment	Partnership Response	Changes Made
Stu Precious	Oh puhleeze. this is stupid. The National planning Framework provides this.	National Policy makes provision for enabling development in the context of preserving or enhancing heritage assets. National policy does not make provision for enabling development in respect of coastal matters but this SPD can and does.	No change.
unite the union (Robert Riley)	offshore	While the SPD will pursue Integrated Coastal Zone Management to ensure effective alignment of the terrestrial and marine planning regimes, the SPD cannot provide guidance relating to policies set out in Marine Plans or proposals governed under the marine planning regime, unless such proposals overlap with the terrestrial planning regime.	No change.

Respondent	Comment	Partnership Response	Changes Made
Jeffrey Hallett	What is enabling development in this context? The definition in 5 appears to be just the sort of action by a Secretary of State that I have mentioned in Q 7.	Comment noted. Enabling development is development that would ordinarily be contrary to policy but would secure a particular public benefit which may outweigh the disbenefits of departing from policy.	No change.
Margaret Hallett	Not sure what 'enabling development' means. If it is development that over rules local agreements and concerns it is not wanted.	Comment noted. Enabling development is development that would ordinarily be contrary to policy but would secure a particular public benefit which may outweigh the disbenefits of departing from policy.	No change.
North Norfolk District Council (Harry Blathwayt)	An expected life span of the development, taking into account worst case scenarios regarding the effects of global warming, particularly on water levels and turbulent weather patterns.	Comment noted. The SPD will provide guidance relating to the expected lifespan of development in the CCMA and of the particular public benefit that may enable an assessment as to whether a departure from policy is warranted.	Guidance relating to the expected lifespan of development and of the particular public benefit 'enabled' by the development.
Tessa Aston	Whilst development is always good news for towns it must be done with care. To overload the existing systems and land could be detrimental. Yes Felixstowe wants to increase the revenue brought into the town but it must not affect the existing nature reserve or areas of historical or biological importance. Careful watch needs to be maintained as the climate changes which will affect the sea, port and residential areas. It is a fine balance between improving the town and its facilities without disturbing the fragile environment.	Comment noted; reaching a balance is not always easy, as has been stated but the SPD will aim to help provide guidance on this matter.	No change.
Lindsay Frost	All developments should be as risk free as possible (erosion, storm surge) and not cause interference with natural processes.	Comment noted and it is agreed that it is vital that any enabling development is itself as risk-free as possible and does not cause unjustifiable interference with natural processes. Almost all enabling development would be expected to be outside the CCMA	No change.
Richard Starling	Await outcome of the Broadland Futures Initiative before we know in detail about relevant options.	This SPD and the Broadland Futures Initiative (BFI) operate within the same topic area, that of coastal	No change.

Respondent	Comment	Partnership Response	Changes Made
		change. However, the SPD is very much focussed on providing guidance relating to the implementation of planning policies, whereas the BFI is looking to inform the overarching flood risk management strategy for the next 100 years over a much wider area. The SPD and BFI can complement each other, and the SPD need not be restricted by the timings of the BFI.	
Norman Castleton	There should be no further development apart from defensive work on the coastline	Comment noted but this is not a realistic position – some development (such as for critical infrastructure) will always be necessary and other development may be acceptable and even desirable, so long as the impacts and any risks are not unacceptable	No change.
Norfolk County Council - Natural Environment Team (Catherine Dew)	When ‘enabling development’ there are opportunities to look favourably on developments that provide additional BNG (e.g. 100% -200% above the baseline) and incentives for green roofs....etc. but this will need to be carefully thought out as development will still need to avoid ecologically sensitive areas.	Comment noted. The Partnership will consider providing guidance relating to Biodiversity Net Gain, in anticipation of the provisions of the Environment Act.	Consider providing guidance relating to Biodiversity Net Gain.
Blue Sky Leisure (Paul Timewell)	The SPD needs to acknowledge that Roll-Back can be an expensive process and should provide positive and clear advice on the nature of enabling development that would be considered acceptable, for instance, to help fund roll back proposals. It should include expectations for material and information demonstrating that enabling development is appropriate. It should also provide advice and guidance where enabling development might be a distance away from the activity affected by coastal change, including in another district.	Comment noted. The SPD will provide guidance relating to enabling development, including the circumstances under which enabling development may be acceptable.	No change.
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	Difficult to really comment much on this in general terms. Therefore, the LLFA would wish to discuss such sites on an individual and detailed basis. We would also request guidance to be produced on conducting ground	Comment noted and agreed – each proposal will have to be judged on a case-by-case basis	No change.

Respondent	Comment	Partnership Response	Changes Made
	investigations, building access routes and putting up storage area that is in accordance with our current LLFA developer guidance and LLFA policies. Again, our requirement for a Flood Risk Assessment and temporary drainage strategy would need to be completed in accordance with our existing guidance.		
Felixstowe Town Council (Ash Tadjrishi)	No comment – this is not currently relevant to Felixstowe - long may that remain so.	N/A	N/A
J E Blanchflower	Suggesting sites for development away from the coast or using 'brown field' coastal sites. Coastal development should be discouraged so that the remaining undeveloped sections of our coastline remain as wildlife habitats to be appreciated by future generations. Above all, no more second homes on coastal sites.	<p>Comment noted. Enabling development would normally be expected to be away from the coast.</p> <p>The SPD has no power to limit whether any new homes are second homes.</p>	No change.
Lowestoft Cruising Club (David Bennett)	Difficult to suggest specific guidance as it depends on the particular development and how it is contrary to policy, and how and to what extent it would secure a particular public benefit which may outweigh the disbenefits of departing from policy.	Comment noted and agreed – enabling development can only be judged on a case-by-case basis	No change.
N/A (Caroline Spinks)	Sometimes NOT to develop may be the more valuable option.	Comment noted.	No change.
Andrew McDonald	Previous experience of the proposed (and actual) use of Enabling Development by Suffolk Coastal D C (and the statements in sections 3.72-3.74 of the recently adopted East Suffolk Local Plan) give cause for concern that Enabling Development may be regarded as a policy option, rather than an exceptional mechanism. It is also difficult to determine from the consultation document exactly what form this 'option' would take – could ED be used as a fundraising mechanism to defray the cost of relocation? Or would it be used as a mechanism for siting relocated housing in areas which would normally be inaccessible to development? In either case, it is important to take very	<p>Comment noted. Paragraphs 3.72-3.74 of the Suffolk Coastal Local Plan (SCLP) demonstrate the importance of a plan led system by noting that enabling development may be accepted in exceptional circumstances – in other words, every such case needs to demonstrate the particular justification to warrant a departure from the Local Plan, and the bar is high.</p> <p>Plan-led approaches helpful to relocation and rollback can be practised. Waveney Local Plan Policy WLP6.1 is an allocation of 220 new dwellings in</p>	No change.

Respondent	Comment	Partnership Response	Changes Made
	seriously the restrictions on the use of Enabling Development – as the current Local Plan states, it requires ‘..exceptional individual circumstances..’, and its use in exceptional circumstances ‘... needs to be justified, transparent and deliverable as a comprehensive package, with clear community benefits.’ {para 3.73}. It cannot be adopted in advance as a potential funding or development option, and it is surely preferable for East Suffolk Council to use the existing planning system appropriately, rather than to seek to rely on mechanisms that avoid the planning regulations that have been adopted to protect the community and its environment.	Reydon, of which seven are reserved for people whose properties have already been lost to erosion, or are at high risk of being lost soon. But there will always be occasions where a case is made for enabling development, which cannot have been envisaged by the Local Plan.	
Peter Terrington	Only essential development considered in coastal fringe.	Comment noted – inappropriate development in the CCMA is by definition not acceptable	No change.
SCEG - Scratby and California Environment Group (Lodge)	Identifying land or sites appropriate for future roll-back use. As much detail as possible to guide the local authorities on what can be done. At what stage to allow action on policy	Comment noted. The SPD cannot identify land for development, for future rollback or relocation, as this is the role of the Development Plan, but will provide guidance to assist.	No change.
Southwold Town Council (Lesley Beevor)	No Comment	N/A	N/A
Water Management Alliance (Jessica Nobbs)	The Board have created a number a document (Planning and Byelaw Strategy) which we believe should be referenced within the SPD when referring to development within one of the Boards IDD which will help other Risk Management Authorities as well and land managers and developers intending to undertake works/development within the IDB districts. The document intends to support other RMAs that relate to flood risk, erosion and environmental matters.	Comment noted. The SPD will reference documents where they would be of relevance to the application of the guidance provided.	No change
Deben Estuary Partnership (Christine Block)	Points on Enabling Development taken from the appendix to Deben Estuary Plan: Enabling development may be permitted as an exception to policy when delivering sufficient, measurable benefits to flood protection and	Comment noted. Consideration will be given to the Deben Estuary Plan’s enabling development criteria with a view to setting out appropriate criteria in the draft SPD.	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>estuary management which could not otherwise be achieved. Reasons for allowing Enabling Development: ●● to provide direct financial benefit to estuary management – focused on essential, long term, flood protection measures within a defined estuary area, necessary to maintain or improve flood defence ●● to support opportunities to deliver partnership funding when a lack or shortfall of government grant aid and other finance and restricts action ●● to support flood protection measures which have been agreed as necessary by all relevant landowners and consented by the EA Site selection for enabling development should: ●● be located outside areas identified by the Environment Agency as being at risk of flooding from estuaries or sea ●● be based on a principle of the optimal number of additional dwellings sustainable within a defined parish and estuary area ●● be appropriate in scale, sensitive to the topography and mindful of any landscape and environmental designations that apply ●● have no significant, adverse impact on biodiversity and geodiversity ●● contribute to enhancing or maintaining the sustainability of rural communities in accordance with the Settlement Hierarchy ●● deliver development that reflects, when possible, evidenced local need in terms of dwelling size and configuration ●● include the conversion or re-use of redundant or disused buildings</p>		
Anglian Water Services Ltd (Stewart Patience)	No Comment	N/A	N/A
Barton Willmore (Will Spencer)	NFOWF Ltd welcomes the recognition in Section 4 of the Consultation Document that there may be circumstances whereby ‘enabling development’ may be supported. As noted this is development that would be justified based on how its benefits outweigh any disbenefits of departing from policy. The SPD should state that such enabling	The SPD will not set out the types of development that may or may not be granted consent as enabling development, that is for the decision maker on a case by case basis, but the kinds of development suggested here may be essential infrastructure which can only be located at the coast – which means they	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>development may include infrastructure associated with the delivery of renewable energy developments, such as the electricity grid connection for an offshore wind farm or any works/activities associated with its construction (such as the use of ports infrastructure for the assembly/shipping of components). It is not the place of the SPD to seek to impede development which may, subject to appropriate mitigation and effective management, deliver significant overarching benefits to the coastal environment.</p>	<p>are not normally enabling development themselves and will be considered elsewhere in the SPD</p>	
<p>Bidwells (Kate Hammond)</p>	<p>Each application should be looked on its own merits/disadvantages and not specifically attached to a set of immovable guidelines.</p>	<p>Comment noted and agreed – flexibility and a case-by-case appraisal will always be necessary for any proposed enabling development scheme</p>	<p>No change.</p>
<p>RSPB (Ian Robinson)</p>	<p>Guidance on enabling development must be clear on the process that needs to be followed to assess the potential impacts. With respect to the environment, the RSPB expects that potential impacts will be captured through a comprehensive Strategic Environmental Assessment and Habitats Regulations Assessment. These will assess options and identify predicted impacts for which there is a very clear process for mitigation and/or derogation and compensation where appropriate. Such a project will need to ensure that the Competent Authority that the overall coherence of the Natura 2000 network will be maintained.</p>	<p>The process for enabling development will be the same for an ordinary planning application. Applications must be submitted with the appropriate evidence and assessments where necessary, which may include Strategic Environmental Assessments and/or Habitats Regulations Assessments.</p>	<p>No change.</p>
<p>The British Horse Society (Charlotte Ditchburn)</p>	<p>Developers should be provided with a copy of 'GG 142 Walking, cycling and horse-riding assessment and review' to ensure any infrastructure relating to development considers all Non-Motorised Users equally. Developers should consult the Norfolk Rights of Way Improvement Plan which states: Opportunities for development – To consult with the equestrian/driving community and establish where there are particular opportunities to improve access to create multi-use routes away from roads.' Developers should be aware of the District or Borough Councils guidance on Public Path Orders as the local planning</p>	<p>Comment noted. The SPD will set out the powers bestowed upon coastal authorities and our partners that can be used to manage the coast, and coastal management policies and guidance established in Local Plans and national policy.</p>	<p>No change.</p>

Respondent	Comment	Partnership Response	Changes Made
	authorities responsible for changes to the Public Rights of Way Network with regards to development.		

9. What case studies should be used in this SPD to demonstrate coastal adaptation best practice?

Respondent	Comment	Partnership Response	Changes Made
Stu Precious	Hopton Beach. The debacle in causing adverse longshore drift that is Great Yarmouth Outer Harbour. Hemsby, Happisburgh.	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
unite the union (Robert Riley)	work load	N/A	N/A
Jeffrey Hallett	?	N/A	N/A
Margaret Hallett	No idea what this means either	N/A	N/A
North Norfolk District Council (Harry Blathwayt)	We need to study the best practice of other Low Land areas especially the Benelux countries	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
Tessa Aston	Looking at Climate Adaptation Platform, the National Park Service 2015 undertook 24 case studies giving examples of infrastructure and coastal adaptation strategies incorporating climate change, improving public awareness, how to make the infrastructure resilient to climate change. European Climate Adaptation Platform 2018 looked at 10 case studies. NCCARF and CoastAdapt Archive Library - Adaption Good Practice case studies 2017	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
Lindsay Frost	Happisburgh, Norfolk from 2009 Coastal realignment in Essex	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
Richard Starling	Who knows !!! Lets us wait for the opportunity for the public to ask questions, find out information from those responsible ie The Environment Agency.	When prepared, the Partnership will consult on the Draft SPD.	No change.
Norman Castleton	The defensive work in Holland and that Sea Palling and work by the RSPB	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
Blue Sky Leisure (Paul Timewell)	The SPD could use the planning permission granted in the 1990s by North Norfolk District Council, that permitted the	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.

Respondent	Comment	Partnership Response	Changes Made
	relocation of 42 vulnerable static caravan pitches from the clifftop at Woodhill Holiday Park, East Runton, to an alternative site in the AONB at Kelling Heath Holiday Park. This is a good example of a successful application of the roll back policy, which has since been successfully implemented and led to the adoption of a positive Local Plan policy to cover this type of development.		
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	No examples are known to be available from Norfolk CC Lead Local Flood Authority. This aligns the district councils and the EA are responsible for coastal protection. The LLFA will appreciate that any roll back may involve flooding to Norfolk. We are aware of the Bacton Sandstone Project is an example that NNDC were leading on and received funding for. We are aware that the managed re-alignment or roll back of the coast will have an impact on the infrastructure that the County Council are responsible for e.g. the Coast Road. Therefore, any such policies should take account of this.	Comment noted. The Partnership will explore the opportunity of including the mentioned case study.	Consider Bacton case study.
Felixstowe Town Council (Ash Tadjrishi)	In regard to safety in HTL areas, 2 cases demonstrate options: i) Martello Park Felixstowe ii) Adastral Close Felixstowe (Orwell Housing Assn)	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
J E Blanchflower	Minsmere RSPB Reserve which is of international importance as a wildlife/ornithological habitat and has an unspoiled, undeveloped interface with the sea. The Lowestoft Action Zone includes some imaginative ideas for re-development of the Denes area which was a former fishing hamlet (The Grit) and industrial site. The open spaces/net drying areas will remain for leisure and historical importance.	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
Lowestoft Cruising Club (David Bennett)	Any case studies that are relevant to the type of coastline covered by the Coastal Adaption SPD.	Comment noted.	No change.
Andrew McDonald	No comment	N/A	N/A

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

Respondent	Comment	Partnership Response	Changes Made
	<p>would be valuable for informing appropriate options on the Norfolk and Suffolk coast and further afield. Much of this experience has been gained through close working with the Environment Agency in relation to adapting coastal management and as part of their Habitat Creation Programme. Such projects include: Titchwell; Minsmere North Marsh; Dingle Marshes; Wallasea; Medmerry; plus, many projects overseas working with Birdlife partners and country Governments. We also have a range of advisory material that may be helpful to determine appropriate options based on the ecological requirements for a suite of species and habitats, including: Wet Grassland and Reedbed guides and our contribution within the Fen Management Handbook The principle must be to always operate at a landscape scale employing the Lawton principle – bigger, better, more connected; making best use of opportunities for net gain and creating a more equitable balance between nature and agriculture and business. Equally the benefits of saltmarsh as one of the better habitats capable of sequestering carbon should not be underestimated, but not used as a measure or justification for allowing coastal change. This creates an opportunity to apply net gain principles in creating a new habitat, whilst at the same time relocating existing freshwater habitats and landscapes with better integrated land management to safe locations inland.</p>		

10. Do you have any other comments which could help the partnership prepare the Supplementary Planning Document?

Respondent	Comment	Partnership Response	Changes Made
Stu Precious	GO and do your homework. Not at all impressed. Bring a workable proposal, not a pen pushing box ticking exercise.	The initial consultation gave respondents the opportunity to influence the content of the SPD. After taking account of consultation responses the Partnership Authorities will prepare and consult on the draft SPD.	No change.

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

Respondent	Comment	Partnership Response	Changes Made
Margaret Hallett	It is important that it is understood that the coastal area is very important to many locals who may live 20 miles from the coast but use the area frequently for work, shops, recreation and entertainment so that the partnership should not be restricted to those from parishes who have a shoreline!	The initial consultation on the SPD was sent via email and/or letter to all individuals and organisations on the Partnership Authorities' mailing lists, and all town and parish councils. Furthermore, the consultation was open to the public and therefore anyone could have responded to the initial consultation.	No change.
North Norfolk District Council (Harry Blathwayt)	Only that I am concerned that the area I represent is very vulnerable and will be affected greatly by any decisions or recommendations of this body.	The SPD will not make recommendations or policy concerning the coast and development at or near to the coast Comment. It will instead provide guidance for the application of coastal adaptation planning policies.	No change.
Keith Phair	I am aware that the various coastal defences in the area are owned by various bodies and the responsibility for repair and maintenance therefore falls on a range of public and private organisations. It would be highly helpful if these could be mapped and responsibility clearly delineated, so that those organisations and the public have a clear understanding of ownership and responsibility. For example, my understanding is that parts of the prom at Felixstowe are the responsibility of the District Council and other parts are the responsibility of the County Council and other bodies.	Various organisations have roles and responsibilities in relation to buildings, infrastructure and the environment along the coast. The draft SPD will set out the roles and responsibilities of some of the key organisations on the coast.	Set out the roles and responsibilities of key organisations along the coast.
Tessa Aston	Be guided by what is best for this beautiful area of Suffolk not in monetary value but in consideration of what works right now.	The SPD will provide guidance relating to a number of different considerations that need to be made in decision making, including but not limited to the preservation of the historic and natural environments along the coast.	No change.
Gaius Hawes	1. It seems that the intention here is to create an across the board information and legislation info without any clout. So just informative which although good in one respect. It seems that each authority will do just as it wishes. 2. Is it financially viable to have such an organisation that works with varied authorities that have varying degrees of interest. 3. In the past Suffolk Council has made statements about	When adopted, the SPD will be a material consideration and carry weight in the determination of planning applications. The Partnership preparing the SPD includes East Suffolk Council, Great Yarmouth Borough Council, The Broads Authority, North Norfolk District Council,	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>building distances between planed structures and the sea wall here in Lowestoft. Only for the local authority at the time to overrule what has been published. What are the chances of one area seeing the benefit and there to be realistic control. 4. It is apparent that the Port Authority here has more clout than many appreciate. By closing of roads that have been used by the public for many years. Or even the South Pier. So will the power of Felixstowe lead to unbalanced approach once this is up and running. As money speaks. 5. How often will the body meet to discuss and how will it be managed let alone funded. 6. Although communication should be increased through this I just wonder if it will be used to be abused.</p>	<p>and the Costal Partnership East Team. The Partnership is therefore operated by officers from each Local Planning Authority and funded by the authorities involved.</p>	
<p>Lindsay Frost</p>	<p>Must include adaptations to climate change and isostatic readjustment</p>	<p>The SPD realises that coastal change is inherently linked to climate change, and it is through Local Plan policies, SMPs and Environment Agency advice on sea-level rise rates etc that these factors are taken into account.</p>	<p>No change.</p>
<p>Michael Castle</p>	<p>1. I accept the premise for a whole coast strategy whilst needing to point out that GT YARMOUTH town stands out as an exception in that - like HULL further up the coast - it is a densely populated settlement with port and industrial infrastructure that needs to be defended by engineering solutions. To that extent it differs from the bulk of the coastline between the Orwell and the Wash. The BACTON inter-connector gas pipeline is another location where engineering may be the preferred approach. 2. Roll-back and relocation are considerations for coastal villages further North in the Borough - for example WINTERTON, SCRATBY and HEMSBY - although the latter's holiday industry is a complicating factor to such an approach. 3. In the case of the town area of GT YARMOUTH itself it will be important to show that difference in terms of the long-term strategy and acknowledge the ongoing large Environment Agency</p>	<p>The SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs). However, the different nature of the whole coast is, of course, recognised, both in SMPs and Local Plans. The SPD will provide helpful guidance, but it will not be a 'one-size-fits-all' approach.</p>	<p>No change.</p>

Respondent	Comment	Partnership Response	Changes Made
	investment in River Defences along the Yare and Bure to bring those up to 1:200 year standard and to acknowledge the strategic regeneration development sites on Yarmouth river frontages.		
Richard Starling	I suppose you have to find something to do but please just wait until we have information and facts from the Environment Agency. There is no urgency to complete a Supplementary Planning Document.	This SPD and the Broadland Futures Initiative (BFI) operate within the same topic area, that of coastal change. However, the SPD is very much focussed on providing guidance relating to the implementation of planning policies, whereas the BFI is looking to inform the overarching flood risk management strategy for the next 100 years over a much wider area. The SPD and BFI can complement each other, and the SPD need not be restricted by the timings of the BFI.	No change.
Great Yarmouth Borough Council (Environmental Services) (David Addy)	I can confirm that Great Yarmouth Borough Council's Environmental Services supports the proposed Coastal Adaptation Supplementary Planning Document, and has no detailed comments to make.	Support noted.	No change.
Robert Wynn and Sons (Tim West)	We read with interest the Coastal Adaptation Supplementary Planning Initial Consultation Document, which sets out the purpose and planned scope for your document. We would very much support your whole coast approach taken by yourselves. We would wish to highlight that there are power generation and transmission sites earmarked for development within your region that will require the movement of large and heavy abnormal indivisible loads. Due to the size and weight of transformers, generators etc project developers should be encouraged to limit the road mileage travelled by such loads. Such sites would include Sizewell C and the onshore connections for the many offshore windfarms planned in your region. Planning guidance should not be a barrier, more so should facilitate the opportunities for beach landing suitable craft	The guidance provided within the draft SPD may be of relevance to planned large scale infrastructure projects. In addition, the SPD will pursue Integrated Coastal Zone Management to ensure effective alignment of the terrestrial and marine planning regimes. However, loads required to be moved by sea may form part of nationally significant energy projects, which would not require planning permission but a Development Consent Order under the Planning Act 2008. In such circumstances, the draft SPD would not be relevant.	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>for the delivery of the largest and heaviest abnormal indivisible loads. Subject to achieving a marine licence via the Marine Management Organisation and permissions from landowner (Crown Estate & Local Authority) beach landings can and have been used to significantly reduce the road mileage travelled by the largest abnormal loads. We would be happy to input when appropriate to the development of further guidance on coastal development and attach a few images of beach landings where either no infrastructure was required or where temporary infrastructure was created and then removed.</p>		
<p>Martlesham Sea Wall Group (Thomas O'Brien)</p>	<p>I live in Martlesham Heath, just East of Ipswich. Its an area planned for immense growth. So a group of us has come together to try and increase foot access along the river Deben. (Martlesham River Wall Group). In particular we would like to see Martlesham Creek linked with Waldringfield. A public footpath exists but the sea wall has been broken at one point making the path unpassable. Currently Natural England are supporting the English Coast Path along the river Deben. Which includes forming a footpath from Martlesham Creek to Waldringfield. Discussions are under way to create this. Your plan should stipulate the importance of the England Coast Path and its value to the public. As well as this, at the last general election, two political parties supported the idea of a Suffolk Coast National Park. An idea could be to expand the Broads National Park to include Suffolk Coast. (Save on administration). I think your report could suggest the idea of a Norfolk and Suffolk National Park. Some bodies can have an overly negative attitude to public access. In particular the conservation groups are developing a 'landowner' mentality. Taking claim to wide stretches of the coast and estuaries assuming it belongs to them, preventing public 'disturbance' but nevertheless turn up whenever they wish in 4 wheel</p>	<p>The SPD will not propose works or development within the SPD area, however the guidance provided within the SPD may be of relevance to such works or development.</p> <p>The SPD will primarily focus on providing guidance relating coastal planning policies, however public access to our coast and estuaries is of great importance and will be an important consideration in the application of coastal planning policies.</p>	<p>No change.</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>drive vehicles and trample everywhere looking for rare plants and insects. Also introducing animals such as Exmoor ponies which means widespread fencing which in turn inhibit public access. But the fact remains places like Martlesham are growing considerably. Its only fair to the inhabitants of these new towns to provide access to the outdoors. The two issues of planning for new dwellings and protecting our coast should not be two separate issues. If new dwellings are planned near the coast then inevitably the public will seek to enjoy the outdoors. We cannot just put a barbed wire fence around new communities. Some thought can be put to shielding footpaths with fences, and regular bird hides so that the wildlife can be protected and at the same time the public can enjoy being there.</p>		
<p>Michael Powles</p>	<p>East Norfolk and North East Suffolk Our coastlines are under threat from the sea and from the landward side. Eventual inundation of coastal areas from the sea as a result of global warming is now a given. Melting glaciers and disintegrating polar ice caps are visible, measurable and credible. It is not a question of if, but when, we shall be overwhelmed by the sea and/or rivers backing up. The town of Great Yarmouth and much of the rest of the borough is surrounded by water and marshes. The latter are mostly at or below existing sea level. Gt. Yarmouth and parts of Lowestoft are already highly vulnerable to flooding from sea and rivers. If the sea defences are breached salt water could travel long distances inland and flood places like Hickling, Potterheim, areas around Acle and all along the river courses and through the Broads. Volatile shore lines still come and go but long term residents are clear that the overall trend is for the shoreline to retreat inland where not defended. From the landward side the coastline is vulnerable as a result of excessive development over many years, leading to ever increasing levels of human footfall and leisure activities. The trend to</p>	<p>The SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs). Nor can the SPD create new or amend existing planning policies as this is the role of the Development Plan and National Policy.</p> <p>The SPD will, however, provide guidance relating to the implementation of costal adaptation planning policies.</p>	<p>No change.</p>

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

Respondent	Comment	Partnership Response	Changes Made
	vulnerable and sensitive areas and critical natural sea defences.		
The British Horse Society (Charlotte Ditchburn)	<p>I am writing on behalf of the British Horse Society (BHS) a membership charity with over 112,000 members representing the UK’s 3 million regular riders and carriage drivers, in response to the current consultation on the Fareham Borough Local Plan. The BHS is the largest and most influential equestrian charity in the country, working to improve the lives of horses and their owners through its four core foundations of education, welfare, safety and access. 1. BACKGROUND TO OUR COMMENTS Nationally, it is estimated that there are 3.5 million people in the UK who ride or who drive a horse-drawn carriage. Hampshire has among the highest densities of horse ownership in the country (source: former National Equine Database). We estimate that 220,000-270,000 are employed in equine industries and the equine industry is estimated to be contributing at least £7 billion each year to the local economy, mainly through goods and services supplied by small businesses such as feed merchants, vets, farriers, trainers, saddlers, etc. Road Safety is a particular concern to equestrians, who are among the most vulnerable road users. Between November 2010 and March 2019, the BHS received reports of 3,737 road incidents, in which 315 horses and 43 people were killed. Research indicates however that only 1 in 10 incidents are being reported to the BHS; in 2016-17 alone, 3,863 horse riders and carriage drivers in England and Wales were admitted to hospital after being injured in transport accidents. (NHS Hospital Episodes Statistics). The BHS actively campaigns to improve road safety by making motorists aware of what to do when they encounter horses on the road (see https://www.bhs.org.uk/our-work/safety/dead-slow – we recommend taking a few minutes to watch the ‘Dead Slow’ virtual reality film for an</p>	<p>The first part of the respondent’s comments relate to the Fareham Borough Local Plan consultation, which is of course not relevant to the SPD.</p> <p>The SPD cannot create or amend planning policies as this is the role for the Development Plan, nor can it create or amend policies for the management of coast, as this is the role of Shoreline Management Plans. The SPD can provide guidance to help implement coastal adaptation planning policies. Where relevant to the implementation of coastal adaptation planning policies guidance relating to access along the coast will be included within the SPD, including as related to the rollback and relocation of development.</p>	No change

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	<p>impression of how vulnerable equestrians are in proximity to cars and lorries). Because of the difficulties that equestrians encounter on roads, they avoid using them wherever possible. Road use is often unavoidable, however it is simply because people have nowhere else to exercise their horses. The main off-road access available to them is the network of Rights of Way (RoW). England and Wales have over 140,000 miles of RoW, but only 22% of this network is available for horse riders (who may only use routes designated as Bridleways and Byways) and a mere 5% to carriage drivers (who only have access to Byways). An additional factor is that the network is fragmented, and roads are often the only available links between one RoW and the next.</p> <p>2. COASTAL ADAPTATION SUPPLEMENTARY PLANNING DOCUMENT INITIAL CONSULTATION</p> <p>a. Are there any elements of National or Local Planning Policy which should be particularly emphasised/explained in the SPD? Yes</p> <p>b. What guidance for development in the Coastal Change Management Area should be identified in the SPD? Guidance for development in the Coastal Change Management Area should include guidance regarding access, including the BHS leaflet for developers and planners enclosed with this letter. A document such as the ‘Equestrians in Hampshire – a reference guide for Transport, Planners, Developers and other decision makers’ mentioned below should be developed for each county and used for Norfolk and Suffolk. At very minimum developers should be aware of their duties regarding ‘Public Rights of Way affected by coastal and estuarine change or management’ provided by Suffolk County Council at: https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/rights-and-responsibilities/public-rights-of-way-affected-by-coastal-and-estuarine-change-or-management/</p> <p>c. Are the categories identified in section 3</p>		

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

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	<p>access for equestrians and a documented lack of provision. The issues identified in the Norfolk Access Improvement Plan 2019-2029 which states ‘The network of bridleways, restricted byways, byways open to all traffic and unclassified country roads (UCRs) across Norfolk is sparse and scattered with a minimal number of joined up circular routes’. We hope that the Coastal Adaptation Supplementary Planning Document will take the opportunity to address the disjointed nature of Norfolk and Suffolk’s Right of Way network and should include: a. Recognition of equestrians as vulnerable road users Historically, pedestrians and cyclists have been considered as the main vulnerable road users. Equestrians are however increasingly recognised as being part of this group: during the Parliamentary Debate on Road Safety in November 2018 Jesse Norman, Under Secretary of State for Transport, stated that “We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders.” We therefore ask that the Coastal Adaptation Supplementary Planning Document includes Norfolk and Suffolk’s equestrians as vulnerable road users, to ensure that their needs are considered equally alongside those of pedestrians and cyclists. b. Equestrians to be included in any shared-use routes, wherever possible in order to maximise opportunities within development to help provide more off-road links for equestrians, where shared-use routes are created for active travel as a part of any development, planning policy should support the automatic inclusion of horse riders on shared off-road routes, unless there are specific reasons why this is not possible. Conflict with cyclists is sometimes given as a reason for excluding horses from shared routes, but this rarely has anything to do with either the horse or the bicycle, simply the inconsiderate person who happens to be riding one or the other. Horse riders and</p>		

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	<p>cyclists as two vulnerable road user groups have more in common with each other than differences. This is illustrated by the work that the BHS are doing in partnership with Cycling UK in the current ‘Be Nice, Say Hi!’ campaign and with Sustrans in their ‘Paths for Everyone’ initiative. The key to a successful shared route is the design: for example, rather than positioning a cycle path down the centre of a route with verges either side, the cycle path should be positioned to one side and the two verges combined to provide a soft surface for walkers, runners and horses on the other. (This also addresses the issue of horse droppings which, as research has confirmed, represent no danger to health and disperse quickly, particularly on unsurfaced paths.) 4. CONCLUSION Horse riding is a year-round activity which (along with associated activities such as mucking out and pasture maintenance) expends sufficient energy to be classed as moderate intensity exercise. The majority of those who ride regularly are women, and a significant proportion of riders are over 45. For some older or disabled people, being on horseback or in a horse-drawn carriage gives them access to the countryside and a freedom of movement that they would not otherwise be able to achieve. There are also considerable psychological and social benefits from equestrian activities, as the BHS is demonstrating through the Changing Lives through Horses initiative. Equestrianism is a popular activity in both of the counties of Norfolk and Suffolk, and one which contributes significantly to the local economy. The equestrian community in Norfolk and Suffolk currently have many difficulties in finding safe access within the area, mainly as a result of past development. Many of these issues could be addressed and resolved through good planning of future development. We hope therefore that the Coastal Supplementary Planning Document will include policies that will support this.</p>		

Respondent	Comment	Partnership Response	Changes Made
Norman Castleton	The routes to obtaining the necessary finance.	The draft SPD provides some guidance relating to funding development and/or coastal management measures. However, the purpose of the SPD is not to provide financial assistance but to aide the implementation of coastal adaptation planning policies.	Identify potential funding mechanisms for the implementation of coastal adaptation planning policies
Bungay Town Council (Jeremy Burton)	A ring main system would be preferable to one-to-one windfarm access to the shoreline. Coastal management is another issue and any changes in the sea will have an effect at some point along the coastline. Any coastal management subsequently required should also be funded by Central Government.	The SPD cannot create or amend planning policies as this is the role for the Development Plan, nor can it create or amend policies for the management of coast, as this is the role of Shoreline Management Plans. The SPD can provide guidance to help implement coastal adaptation planning policies.	No change.
Norfolk County Council - Natural Environment Team (Catherine Dew)	Green Infrastructure and establishing measurable biodiversity net gain should be a fundamental part of development proposals/asset relocation (not an after-thought). There is potential for creating new habitats which benefit both Norfolk's biodiversity and recreation. Green roofs will help mitigate the effects of climate change for example by reducing the carbon footprint of buildings.	The SPD will set out the affects that coastal processes and policies can have on the natural environment. The SPD will provide guidance for biodiversity and the natural environment where relevant to the implementation of coastal planning policies, however it cannot create or amend planning policies as this is the role of the Development Plan.	No change.
Norfolk Police (Penny Turner)	Having examined this on the portal link provided, Norfolk Police will not be commenting at this stage but look forward to more input on the forthcoming draft document.	Comment noted.	No change.
Blue Sky Leisure (Paul Timewell)	Together with Glyn Davies, of Glyn Davies Planning, we advise Blue Sky Leisure (BSL) in respect of planning matters on a number of sites in the Company's control, including an established Caravan and Camping site on the cliff top at Woodhill Park, East Runton, nr Cromer - in the North Norfolk District Council area. We appreciate that the SPD is still in its early stages and this current consultation is more about its suggested content, but we are pleased to have the opportunity to get involved and help shape the document. Over the years together with BSL, we have developed considerable knowledge and experience in working with	Support and comment noted. The rollback development mentioned forms part of the case studies appended to the draft SPD.	No change.

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	<p>North Norfolk District Council to develop Local Plan policies dealing with coastal adaption The Company has also successfully implemented the Council’s Local Plan ‘roll back’ policy to relocate vulnerable cliff top caravan pitches at Woodhill to an inland location. More recently, we are presently engaging with North Norfolk Council Officers, concerning the latest impact of cliff erosion on Woodhill's operations and discussing how best to deal with these impacts. Consequently, we are very interested in the emerging SPD. BSL would be happy to share advice, its experience and knowledge dealing with the impacts of coastal erosion on its business, and how issues have been overcome in the past and potential opportunities for overcoming issues in the future. Please do contact me in the first instance should this be of interest.</p>		
<p>Nigel Doyle</p>	<p>Further to the consultation that you are currently undertaken, please find attached a copy of a Chief Officer’s note on the subject recently produced, following consultation, in Cornwall. The topics in it seem equally relevant to East Anglia and hopefully it will assist.</p> <p>Attachment: https://eastsuffolk.inconsult.uk/gf2.ti/af/1172354/300644/PDF/-/final-chief-planning-officer-note-planning-for-coastal-change-march-2020.pdf</p>	<p>The content of Cornwall Council’s planning note on coastal change from March 2020 addresses coastal adaptation planning policy from the Cornwall Local Plan, relevant Shoreline Management Plans and while the policies are different to those set out in the SPD area some of the context is relevant, particularly in relation to national policy, guidance and legislation.</p>	<p>No change.</p>
<p>Norfolk Coast Partnership (Gemma Clark)</p>	<p>Some general comments include:- How the Heritage Coast designation is included as part of the safeguarding of the coast Tools such as LCA and LVIA’s and their importance in addressing landscape impact. The role of AONB’s both in protecting our coast and through working in partnership finding opportunities for enhancement that benefits landscape, biodiversity and people.</p>	<p>The draft SPD provides guidance relating to coastal adaptation planning policies and the impact of the implementation of such policies on environmental designations, to avoid harm and ensure appropriate mitigation where necessary.</p>	<p>No change.</p>
<p>Norfolk County Council - Lead Local</p>	<p>Please ensure reference to the LLFA Guidance document and its contents is included. This document and the principles</p>	<p>The draft SPD provides guidance on the implementation of coastal adaptation planning</p>	<p>No change.</p>

Respondent	Comment	Partnership Response	Changes Made
Flood Authority (Sarah Luff)	within it should be promoted as widely as possible as it addresses a large amount of general questions about the LLFA requirements and the LLFA review process. An update of this document is currently being prepared and should be published by the end of the year. We can confirm that at present the requirement for consents to works on ordinary watercourses and for any work that will impede the flow would remain. Furthermore, we recommend that consideration of any local flooding records are made and reflected in any site development proposals.	policies. However, the draft SPD also sets out the roles of responsibilities of organisations operating and managing on the coast.	
Felixstowe Town Council (Ash Tadjrishi)	A) Mapping Good mapping is desperately needed, and essential, including but not limited to: Precise seaward and landward extent of the CCMA's 30m zone. The mapping in the LP is inadequate. This should be done at scales appropriate to the area involved: in built up areas large scales are essential. For HTL areas, the new LP extends part of the concept from the CCMA to define an area of typically 30m from current defences to ensure future maintenance access is not inhibited, and where appropriate to require Erosion Vulnerability Statements to be provided in planning applications. The SPD should map those areas at large scale so that all parties can see the implications clearly. Similarly, "coastal maps" for individual areas should clearly incorporate the SMP designations, at scales appropriate to the type of location. They should also contain easily used links to the current EA Flood Zone mapping, or software can be utilised, direct to that from the EA website. B) Implications for resort frontages. In coming decades seafront infrastructure will be directly affected by Sea Level Rise. Promenades and their immediate hinterlands (e.g. in Felixstowe the Spa Gardens) will need to adapt. Higher and more robust structures will be needed to protect the usability of current assets, possibly glass flood walls, or other wholly new thinking. While this is hopefully some decades	<p>The draft SPD does not contain new maps of existing metrics set out in Shoreline Management Plans or Local Plan policies. However, the Partnership is open to the idea of preparing maps that would aid the implementation of coastal adaptation planning policies.</p> <p>The SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs).</p> <p>The draft SPD provides guidance relating to the implementation of coastal planning policies within both the Local Plans and National Policy but cannot create new, or alter existing, policy. Guidance is provided on the preparation of Coastal Erosion Vulnerability Assessments to ensure development proposals are safe over their planned lifetime.</p>	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>away, current maintenance and development of resort facilities should be aware of these future issues. In particular the decorative walls to the rear of Felixstowe promenade will need to be replaced with wave-resistant structures, possibly within a decade. Whether by general phrasing, or by locally specific sections, these issues should be outlined. C) Flood risk in South Felixstowe. In South Felixstowe we have a situation with a very low risk of a very severe flood event. i.e. there are two scenarios which the SPD should include in planning advice: i) A very exceptional tidal event could, even today, generate tides a further metre above previous events, and that will become progressively more likely over time. In that event flooding in the Langer Road area could be a metre more severe than in 1953. ii) Even in a less severe event, the possibility should be accounted for that the existing defences could fail, either by damage from severe wave action, or by an operational failure if the flood gates were not close for some unforeseen reason, including the eventuality that severe weather could impede access to the town for Norse / EA staff to close the gates. With the current recent change to EA Flood mapping, the area has been reduced from Flood Zone 3 to Flood Zone 2, apparently because the mapping omitted the presence of defences along the frontage, as indeed also on the Golf course frontage. Hopefully that will be reversed – it is under investigation. However, the SPD should reinforce NPPF advice that developments in such areas should be “safe for the lifetime of the development. That should encompass no sleeping accommodation on the ground floor, and no single-storey residential accommodation without an internal escape route to first floor level. We believe this type of advice is properly admissible under the NPPF and does not constitute “new policy”.</p>		

Respondent	Comment	Partnership Response	Changes Made
J E Blanchflower	<p>The coast from Holkham to Felixstowe is one of East Anglia's most important assets in terms of the natural beauty of the sections where there is little or- no development. It is important that these sections are preserved and natural processes are allowed to take place. Failure to respect this will result in overdevelopment such as along the south coast. 'Public realm infrastructure' [I think I understand what the jargon implies] has already had a substantial impact (Felixstowe Docks, Sizewell A & B, Bacton Gas installation, numerous caravan parks in the Lowestoft/Gt Yarmouth area to name a few) and should not expand further into natural habitats.</p>	<p>The draft SPD sets out the impacts that coastal processes and policies can have on the natural environment and provides guidance in relation to the avoidance of harm to the special qualities of environmental designations.</p> <p>The SPD cannot alter the approach to the management of the coast as this is the role of Shoreline Management Plans (SMPs). Nor can the SPD create new or amend existing planning policies as this is the role of the Development Plan and National Policy.</p>	No change.
Lowestoft Cruising Club (David Bennett)	<p>The Lowestoft Cruising Club (LCC) is located at the western end of Lake Lothing. Our activities encompass cruising local and more extensive waters in sailing and small motor vessels. Our site is subject to flooding during tidal surges. We therefore fully support the Lowestoft Flood Risk Management Project which is shortly to be undertaken with raised sea walls and a flood barrier just east of the current bascule bridge. This should alleviate flooding in Lake Lothing and at the LCC site. The maintenance of an operational port of Lowestoft, which is owned and operated by ABP, is essential to LCC activities. We have been involved in the Planning Inquiry and discussions with Suffolk County Council (SCC) on the construction of the Gull Wing third crossing of Lake Lothing. There are potential adverse impacts on the activities of all vessels operating from the western end of Lake Lothing. There are extensive plans for redeployment of land surrounding Lake Lothing. It is essential that the Coastal Adaption SPD provides guidance on such coastal developments and the consequences for all users of Lake Lothing. It is issues like these that need to be covered by the Coastal Adaption SPD. While they are specific issues, and the</p>	<p>The Partnership has considered these points, but considers in general that they relate more to flood risk than coastal erosion. The flood risk and planning situation in the Lake Lothing area is considered in the Waveney Local Plan (2019) and Shoreline Management Plans. Moreover, the SPD cannot comment on specific development proposals, but provide guidance relating to the general implementation of coastal adaptation planning policies only.</p>	No change

Respondent	Comment	Partnership Response	Changes Made
	Coastal Adaption SPD is covering a large extent of coastline, local issues need to fully considered.		
Marine Management Organisation (Stacey Clarke)	Many thanks for giving us the opportunity to respond to the Coastal Adaptation Supplementary Planning Document, covering the coast from Holkham in Norfolk to Felixstowe in Suffolk. Please find attached our response letter which contains general marine planning information and legal responsibilities as well as specific consideration for the Coastal Adaptation SPD. In addition to this, if you, or any of the other relevant authorities, would like further information on the East Marine Plans, I would be happy to provide a meeting covering general information on marine planning, monitoring and implementation of the east marine plans, tools for implementation and an update on the development of marine plans in England.	Marine and terrestrial planning are inherently linked, and consideration has been given to the relationship between the development plans for the SPD area, the Shoreline Management Plans, and the Marine Plans. The draft SPD provides some guidance as to the role of marine planning regime in the wider context of the implementation of coastal adaptation planning policies of the terrestrial development plan.	No change
Paul Bailey	The objectives of the SPD are well defined. You are correct the issues are relatively simple; the erosion of land and rise in sea level.... as King Canute clearly demonstrated. The extent of the problem can easily be identified by superimposing or overlaying the two elements on a plan. This would also show the potential inland flooding which would approach from a different direction and enable a rear-guard action plan. But surely, this already exists and current actions are in place to ban residential building and restrict commercial development in the defined areas. Is the purpose of the SPD is to recommend the parameters e.g. 1 kilometre from shore and 5 metres from current high tide level. The implications, this is the really difficult question. The previous analysis would identify assets at risk. These could be graduated on a more detailed risk assessment. Everyone must be involved and consulted, the potential costs and social disruption will be huge. A detailed plan and financial impact analysis needs to be completed as soon as possible. This should be the primary function of the SPD. I	Shoreline Management Plans are the main mechanism for deciding on the appropriate management regime for the coast, with Local Plan policies also playing a part; the SPD cannot do so (as it can only provide further guidance and support on the implementation of Local Plan policies). The Environment Agency is the key organisation working on flood risk matters, and the councils work closely with it.	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>think the impact study and roll-back plans will take significantly longer than establishing the development recommendations. Although intrinsically linked the first should not be delayed at the expense of the latter. Overall I agree we need a holistic collaborative approach, the coast is dynamic and our actions need to be equally so. The number of bodies involved needs to be small, impartial and empowered. Remember, the camel is a horse designed by a committee, we do not have that luxury if the forecasters are correct. Finally, we should not be reinventing the wheel, our close friends in the Netherlands have potentially greater issues than Norfolk.</p>		
<p>Somerton Parish Council (Gill Lack)</p>	<p>1. The coronavirus restrictions have prevented us from carrying out normal meetings where members of the public can attend. The same restrictions apply to District Councils. It should be accepted that conducting a consultation during these difficult times is not appropriate since a significant proportion of the population may not be aware of it and/or unable to participate with a response. 2. Currently, we have the Broads Futures Initiative (BFI) consultation/project ongoing. This particular consultation should include and address the same points raised in this particular consultation. We therefore request that the Supplementary Planning Consultation(SPC) be postponed until the BFI project is completed. 3. The BFI consultation/project aims to work closely with local people, listen to their views with the decisions made by elected representatives. The process hopefully will include opportunities for local people to ask questions and make suggestions regarding the same, if not similar, points to that raised in the SPC consultation. How can people respond to the SPC consultation without having the latest information regarding flood risk, land levels etc etc.?</p>	<p>The limitations imposed by Covid have made things difficult, as stated. However, local authorities have tried to maintain their normal work activities and given that it was not known how long social distancing would need to be maintained, local authorities had to do the best they could to allow engagement (putting documents online, using social media etc) and continue progressing important pieces of work – such as the SPD. There was a very good response to the initial SPD consultation.</p> <p>This SPD and the Broadland Futures Initiative (BFI) operate within the same topic area, that of coastal change. However, the SPD is very much focussed on providing guidance relating to the implementation of planning policies, whereas the BFI is looking to inform the overarching flood risk management strategy for the next 100 years over a much wider area. The SPD and BFI can complement each other, and the SPD need not be restricted by the timings of the BFI.</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
Woodton Parish Council (Yvonne Wonnacott)	Woodton Parish Council views the joint approach by the Counties as a positive way forward in the right direction and we will wait to hear further developments.	Comment noted.	No change
Andrew McDonald	Thanks for the opportunity to comment at the outset of the consultation.	Comment noted.	No change
Burnham Overy Parish Council (Sarah Raven)	It would be helpful to have a stronger voice where all parish councils along the coast joined forces and that perhaps resilience groups that are proactive help more than being post active after the event has happened.	The Norfolk and Suffolk Associations of Local Councils (NALC and SALC) may be able to assist, but this is not a matter directly for the SPD. Resilience groups do a great deal of proactive work in relation to planning for emergencies and are not just reactionary.	No change
Andrew McDonald	I am writing to raise one particular issue on behalf of a small group of local residents who have been involved recently in leading the opposition to the inappropriate use of Enabling Development in East Suffolk – specifically over the last two or three years in the context of raising funds for river defences. We’d like to offer this point of view on the contents of section 5 of the document, ‘Delivery and Enabling Development’. Previous experience of the proposed (and actual) use of Enabling Development by the then Suffolk Coastal D C (and the statements in sections 3.72-3.74 of the recently adopted East Suffolk Local Plan) give us cause for concern that Enabling Development may be regarded as a policy option, rather than an exceptional mechanism. It is also difficult to determine from the consultation document exactly what form this ‘option’ would take – would ED be used as a fundraising mechanism to defray the cost of relocation? Or would it be used as a mechanism for siting relocated housing in areas which would normally be inaccessible to development? In either case, it is important to take very seriously the restrictions on the use of Enabling Development – as the current Local Plan states, it requires ‘..exceptional individual circumstances..’, and its use in exceptional circumstances ‘... needs to be justified,	<p>Paragraphs 3.72-3.74 of the Suffolk Coastal Local Plan (SCLP) demonstrate the importance of a plan led system by noting that enabling development may be accepted in exceptional circumstances – in other words, every such case needs to demonstrate the particular justification to warrant a departure from the Local Plan, and the bar is high.</p> <p>Plan-led approaches helpful to relocation and rollback can be practised. Waveney Local Plan Policy WLP6.1 is an allocation of 220 new dwellings in Reydon, of which seven are reserved for people whose properties have already been lost to erosion, or are at high risk of being lost soon. But there will always be occasions where a case is made for enabling development, which cannot have been envisaged by the Local Plan.</p>	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>transparent and deliverable as a comprehensive package, with clear community benefits.’ {para 3.73}. It cannot be adopted in advance as a potential funding or development option, and it is surely preferable for East Suffolk Council to use the existing planning system appropriately, rather than to seek to rely on mechanisms that avoid the planning regulations that have been adopted to protect the community and its environment. We’d be happy to discuss this further, or to contribute otherwise to the consultation.</p>		
<p>Cornerstone Planning Limited (Alan Presslee)</p>	<p>Thank you for consulting on the Draft Coastal Adaptation Supplementary Planning Document (SPD). I hereby respond on behalf of the Royal Cromer Golf Club. The club is located on the cliff top – east of Cromer – and has seen its land slowly eroded over the years. The club is looking at options for its future security/viability, including possible planned contingencies to replace golf holes close to the cliff top, which are under imminent threat of loss through coastal erosion. The Golf Club welcomes the Councils’ initiative in developing plans for Coastal Adaptation. Nobody would suggest that there should not be appropriate consideration of the environmental impacts of new development in sensitive coastal areas. However, planning policies need to be applied with flexibility and pragmatism, and there should be a rounded consideration/appreciation of the commercial, operational and practical constraints presented by losing land to the sea, and combating same. In the case of a golf course the loss (or threat of loss) of a one or more golf holes doesn’t just represent a small, proportionate loss of some operational land: the loss of a golf hole makes the course unviable (it has to have 18 golf holes!). The noun ‘Adaptation’ is in the title of the document; so, the ability, facilitation and support (from Councils) to be able to adapt - commercially and environmentally - is absolutely crucial in the changing ‘climate’. Cromer Golf Course (and many other</p>	<p>The Partnership notes the comments and recognises the challenges that many coastal golf courses face in relation to coastal erosion. The draft SPD provides guidance relating to the rollback and relocation of development, which will be relevant to the rollback and/or relocation of golf course holes.</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>seaside golf courses) is in a location where – few would argue – planning permission is unlikely to be forthcoming if applied for today, given the myriad of environmental, ecological and landscape constraints on the coast. Yet, with the passage of time and the implementation of sensitive and proactive environment policies in the management of the golf course, the course is in harmony with its surroundings/environment. In being able to adapt to coastal erosion, and support the local economic, recreational and environmental benefits of the golf course, we are looking for the support of planning policies and this SPD (as a material consideration) to – in principle – enable the golf club to properly plan and adapt, developing potential replacement golf holes and other facilities, provided this is done to a high standard and with regard to the sensitivities of its location. In light of this we would like to see golf courses – and the coastal change and adaption issues that face them – addressed in the SPD and in any designation of a Coastal Change Management Area, and policies applicable thereto. Specifically, that the ability for a golf course to address the necessary (or in some cases anticipatory) creation of new golf holes or other golf club related facilities, is acknowledged and addressed directly. We believe that such would be appropriate, and in the context of relevant policies relating to coastal change in the National Planning Policy Framework. Please keep me apprised of the SPD’s progress, including subsequent stages of consultation.</p>		
<p>Historic England (Andrew Marsh)</p>	<p>Thank you for consulting Historic England on the draft Coastal Adaptation SPD initial consultation document. As the Government’s adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. While we do not have the capacity to provide detailed comments at this stage, we</p>	<p>The draft SPD recognises the importance of the historic environment to this part of the Norfolk and Suffolk coast, however, it is considered that guidance relating to how the historic environment can be appropriately preserved and enhanced is best addressed in other guidance documents at a local and national level.</p>	<p>The draft SPD recognises the importance of the historic environment along the coast and the important role that Historic England play in conserving the historic environment.</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>wish to flag the following matters which we hope that you'll find helpful. Historic environment The Coastline between Holkham in Norfolk to Felixstowe in Suffolk is rich in heritage, and we consider that the SPD represents an important opportunity to highlight the need to consider historic environment sensitivities when determining future proposals. We suggest the following typologies may be helpful in considering impacts on the historic environment:</p> <ul style="list-style-type: none"> • Coastal terrestrial - Heritage assets on dry land - built or archaeological - which could be affected by development proposals, e.g. via change in their setting affecting views to and from and asset, lighting, noise, movement, vibration etc; • Intertidal zone - Heritage assets within the intertidal zone. These could be directly impacted, or as before, could be affected by changes in their settings, for example development in one location resulting in changes to coastal processes affecting heritage assets in another, or as with coastal terrestrial by other factors affecting how they are experienced - for example views to and from, noise, lighting etc. It is also relevant to highlight that there are numerous undesignated heritage assets which are considered of national importance within this zone, but which have not been designated because of the perceived difficulties in preserving and enhancing these in accordance with the statutory duties due to their nature and location. • Marine - Archaeology in and beneath the sea bed, including buried archaeological remains, old land surfaces and the associated palaeoenvironmental evidence that provides information about past climate and environmental changes, as well as artefacts (wrecks or evidence of wrecks). Again, such places could be directly impacted, or as before, could be affected by changes in their settings. Setting of heritage assets The NPPF makes it clear that the setting of heritage assets can contribute to their significance, and in these instances the 		

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	<p>onus is on applicants to demonstrate that their proposals would not adversely affect these assets via a change in their settings. It is worth stressing that considerations of setting from a historic environment perspective go beyond visual changes (e.g. views to and from a heritage asset), but can encompass anything that affects how an asset is experienced, for example noise, movement, vibration, and lighting etc. In the context of this SPD, this could include unintended consequences to coastal process that result from development in one location, for example increased erosion or deposition etc. which adversely affect heritage assets in another location. On this basis we strongly recommend that the SPD include reference to the importance of setting where this contributes to the significance of heritage assets, and that this be a consideration when assessing development proposals. Other relevant Plans or policies A published East Marine Plan exist (published April 2014) which was the first one completed but it does include a section on coastal adaptation with Policy CC1 and there is also a section on 'Coastal change management' (paragraphs 249-252) - We suggest that it would be helpful if the SPD contained a section highlighting this and any other relevant policy, legislation and guidance which should be referred to be applicants and decision makers. Zoned approach to planning A general matter across all the questions is whether specific action should be taken to consider a zoned approach to planning i.e. in recognition of risks associated with coastal erosion or areas with anticipated increased risk of tidal flooding and therefore what action is necessary to record before loss of heritage assets in those zones - Coastal change Finally it will also be important to consider how matters related to 'coastal change' are considered through planning mechanisms</p> <p>- Conclusions I hope that you find the above comments</p>		

Respondent	Comment	Partnership Response	Changes Made
	<p>helpful. We'd like to stress that this response is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise as a result of this plan, where we consider that these would have an adverse effect upon the historic environment. If you have any questions with regards to the comments made then please do get back to me. I would be very happy to meet to discuss these comments further. In the meantime we thank you for making us aware of this SPD and look forward to receiving subsequent consultations on this matter.</p>		
<p>Environment Agency (Martin Barrell)</p>	<p>Thank you for consulting us on the Draft Coastal Adaptation Supplementary Planning Document, covering the coast from Holkham in Norfolk to Felixstowe in Suffolk. We support the holistic approach taken in the production of this document. The SPD presents an opportunity to provide consistent advice across the whole of the coast for the area covered. We would agree that the scope and proposed content of the document both look to be appropriate, and the document appears to be consistent with the National Flood and Coastal Erosion Risk Management Strategy. It will be beneficial to have such a document to reference the Shoreline Management Plan policy decisions for each area, particularly as we move into Epoch 2 of the SMPs. For all types of development proposed in CCMA's affected by flood risk, you should consider whether specific guidance needs to be provided on how that risk should be addressed. This may include how to appropriately apply the Sequential Test, and the measures required to ensure the safety of the development over its defined lifetime. This may also be applicable to roll back/relocation proposals, or enabling development. We would be happy to discuss this point</p>	<p>Appropriate references to SMPs have been made in the SPD and the document considers different kinds of developments and infrastructure and the particular challenges and opportunities that they give rise to. However, the SPD has focussed primarily on risk arising from coastal erosion and as a result does not provide guidance relating to the sequential test.</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
	further if required. We would welcome the opportunity to further review the SPD as the document is developed.		
National Grid Ventures (Alicia Dawson)	National Grid Ventures (NGV) are aware that East Suffolk Council together with Great Yarmouth Borough Council, North Norfolk District Council, the Broads Authority, and the Coastal Partnership East Team are consulting on the Coastal Adaptation Supplementary Planning Document (SPD) from 4th September to 16th October 2020. The SPD will cover the area of coast from Holkham in Norfolk to Felixstowe in Suffolk. East Suffolk Council will be familiar with NGV through our engagement with the Council to date on the proposed Nautilus and EuroLink Interconnector Projects. However, a brief introduction to NGV and our proposals in East Suffolk are set out under the headings below for the benefit of the other parties hosting this consultation. It is noted that the consultation document sets out the proposed structure of the SPD and that following this current consultation, a draft version of the SPD will be prepared for public consultation before being adopted by all of the partnership authorities. NGV would welcome the future opportunity to review and comment on the draft SPD document once published for public consultation. It is understood that the SPD is intended to provide clear guidance as to what development may be appropriate in the Coastal Change Management Area (CCMA) and in what circumstances. In this context it is relevant to introduce NGV's proposals in East Suffolk.	Comment noted.	No change
Peter Terrington	Whilst erosion is recognised as a threat along the cliff coastline, east of Weybourne, the DLSA does not appear to recognise the threat caused by accretion of sand along the sand dune and marsh coastline, west of Weybourne. Accretion of sand in Wells and Blakeney harbours is creating economic, recreational and environmental impacts. There is strong circumstantial evidence to link the increased rate of	The comments are noted but they do not directly relate to the SPD as they relate more specifically to activities in the marine planning realm that potentially impact coastal processes and then therefore impact coastal communities, businesses and the environment. As such, these matters are more appropriately addressed by the relevant	No change

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	<p>accretion of sand in Wells and Blakeney harbours with the commencement of dredging and channel Deepening at Wells and placement of dredged spoil within the marine environment. Increased accretion of sand is also contemporaneous with the development of offshore wind farms and the trenching for cable routes. Obviously natural processes play a huge part in the erosion, transport and deposition of material along the North Norfolk Coast, but little research has been carried out about the part played by human intervention. Observations since 2009 suggest that the rate of accretion of sand has greatly increased. This has had a devastating impact on the mussel fishery at Morston, resulting in the virtual closure of the fishery, putting a number of mussel fishermen out of work. Increased accretion of sand in Wells and Blakeney harbours is also impacting on the offshore fishing industry and the recreational boating interests, as well as impacting on wildlife through the loss of feeding grounds. It is now necessary to regularly dredge inner harbour to keep the channel to the Quay open and around the pontoons at the Main Quay and at Tugboat Yard. Boating interests at Blakeney are seriously investigating the need to dredge Blakeney Harbour. The Wash & North Norfolk Marine Partnership (Formerly the Wash & North Norfolk EMS) has set up a Siltation Working Group to investigate the accelerated accretion of sand along the coastline and in the tidal inlets and it is forming partnerships with other bodies to try to find out why the rate of accretion has dramatically increased over recent years.</p>	<p>Marine Plan and Shoreline Management Plan, as opposed to the development plan and this draft SPD.</p>	
<p>SCEG - Scratby and California Environment Group (Lodge)</p>	<p>Adaption. As much detail to assure public that adaption is explained and as much guidance given as possible.</p>	<p>Relevant detail on adaptation (including links to other guidance) is provided in the draft SPD.</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
Southwold Town Council (Lesley Beevor)	<p>Main issues are what development is permitted and relocation in case of loss of property due to erosion. Southwold shoreline (Walberswick to Easton Bavents) is shown in Appendix A as having little change to 2055. However the cliff at the end of the northern seawall at Easton Bavents may be breached on a shorter time than that (10-30 years). This opens up quite a large number of properties (~100) in North Southwold and South Reydon to risk from tidal surges. The current CMP policy is to allow a shingle bar to develop, backed up by defence along border of marsh. Given the scale of the problem, and the number of properties potentially affected, the issue perhaps need to be spelt out.</p>	<p>Matters relating to coastal management are for the SMPs to consider, alongside Local Plans, but the SPD cannot directly impact these issues.</p>	<p>No change</p>
Suffolk County Council (AONB Team) (Beverley McClean)	<p>Thank you for consulting the Suffolk Coast & Heaths AONB team on the Draft Coastal Adaptation SPD consultation. The AONB team have the following comments to make on the consultation which we hope can be incorporated into the final SPD. 1 Purpose of the SPD In addition to the objectives identified, the objectives of Coastal Adaptation SPD should also include the following objectives: • Provide guidance for temporary uses of land and buildings. • Set out the approach to relocation of residential properties. • Set out the approach to ‘roll back’ for commercial uses and essential infrastructure 2. Coastal Change The AONB teams supports the cross boundary integrated approach being proposed for the preparation of the Coastal Adaptation SPD. We would ask that the Coastal Change Chapter includes information on climate change impacts in estuaries and not just the open coast. Estuaries are an integral part of the coastal landscape of the Suffolk Coast & Heaths AONB. These too are dynamic and being impacted as a result of climate change and for this reason they should be included in the SPD. 3. Links to Shoreline Management Plans In addition to linking to SMPS 5, 6, 7 & 8, the SPD should also reference the need for any</p>	<p>The natural environment has been recognised for the significant, in scale and importance, role it plays along the coast and the benefits it provides communities and businesses along the coast. Reference has been made to the national and local planning policy context, including SMPs, the marine planning system, and of course the role of Natural England. Given the nature of rollback and relocation solutions and the scale of coastal environmental designations the importance of giving appropriate consideration to the natural environment in implementing rollback and relocation development has been recognised in the draft SPD.</p>	<p>No change</p>

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

Respondent	Comment	Partnership Response	Changes Made
	<p>that may need to be relocated /rolled back may well be relocated/rolled back into nationally designated landscapes therefore the need to consider impacts on the natural beauty of the Suffolk Coast & Heaths AONB and The Broads National Park should be included in this section of the document. 5 Delivery and Enabling Development The AONB support the inclusion of information clarifying the circumstances when enabling development may be supported to deliver public benefits. Some enabling development may be delivered in nationally designated landscapes therefore the need to consider impacts on the natural beauty of the Suffolk Coast & Heaths AONB and The Broads National Park should be included in this section of the document. The Natural Beauty and Special Qualities are defined in the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Qualities Indicators Report V1.8 produced in 2016 by Landscape Design Associates Where enabling development is supported to fund new coastal defences for example the design of any defences should consider all impacts on the natural beauty of the Suffolk Coast & Heaths and on the Broads National Park. The AONB team would like to draw your attention to the ‘Suffolk Coastal Sea Defences Potential Landscape and Visual Effects Final Report’ and its recommendations commissioned by the AONB and prepared by Alison Farmer as part of the Touching the Tide programme. We recommend that the Final Report and the recommendations in it are used to shape the content of the emerging Coastal Adaptation SPD. We hope these comments are helpful for the development of the Coastal Adaptation SPD.</p>		
Suffolk County Council (Georgia Teague)	Thank you for consulting Suffolk County Council (SCC) on the Coastal Adaptation Supplementary Planning Document. We have no comments to make on the draft document at this	Comment noted.	No change

Respondent	Comment	Partnership Response	Changes Made
	time. However, we request to be kept updated and engaged in the later developments of this document.		
Water Management Alliance (Jessica Nobbs)	What are the next steps? What is the scope?	The planned scope of the SPD was set out in the initial consultation document, and since has been updated to take account of consultation responses. The next steps are to publicly consult on the draft SPD, consider the consultation responses, amend the SPD accordingly and seek to adopt the SPD, after which it would become a material consideration in the determination of relevant planning applications.	No change
Deben Estuary Partnership (Christine Block)	No Comment	N/A	No change
Kathryn Newnham	Having viewed this document I am aware that I lack the expertise on coastal erosion, tides etc and in other areas. However i have an interest and awareness on certain points so I would like to try and contribute to your consultation. For many years now i have been environmentally aware of many issues David Attenborough has recently brought to the peoples attention. Whilst plastic is a big issue (PCBs?) I think they should find an environmentally friendly alternative - I would ban its production for many unnecessary uses, and completely when they find an alternative, I think chemicals and pollution both in the sea and air is a huge factor in climate change, as is destruction of the rainforests. To live todays life style where our factories churn out dangerous pollutants, the seas have fertilisers, petro-chemicals, sewage and goodness knows what else pumped into them everyday, mankind will eventually be responsible for its own demise. Along the way destroying all other forms of life. If everybody used things like environmentally friendly products (I have used them for years) along with natural things (Lemon degreases and is a good limescale remover in kettles, Vinegar etc.) our oceans and atmosphere would improve	Comments noted. The Councils have consulted a wide range of people and organisations, including the Norfolk Wildlife Trust, Environment Agency, Natural England and many others and is having appropriate regard to their comments. Questions about overall housing numbers and particular planning applications are matters beyond the scope of the SPD, as is offshore dredging. However, the SPD will provide guidance to help manage development and rollback/relocation in coastal areas.	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>considerably. So whilst erosion is natural mankind has increased this process dramatically. Sea levels have risen and human activity around our coasts affects tidal movements. One instantly coming to mind is the dredging allowed off our coastline. Usually by companies from elsewhere (I think a company in Southampton applied for and got permission to dredge here!). Surely this must contribute to the erosion? If you remove the shingle (or whatever it is they gather) A process of displacement occurs, and cliffs like those at Happisburgh (who are soft material) disappear into the sea. Along with the houses and roads that used to have "Sea views"! When somebody does something along the coast someone elsewhere becomes a victim. Great Yarmouth outer harbour is a good example when completed caister and I believe it was Hopton lost a considerable amount of beach. I cannot comment for elsewhere in Norfolk and Suffolk only these incidents which I have known of, although I do know Scratby and Hemsby are in trouble with erosion. What I will say is please listen to the experts and people like the Norfolk Wildlife Trust, WWF, etc. local wildlife/environment experts must surely be of great importance with local knowledge of the areas concerned. A further comment on erosion is with regards to the south coast. Prior to moving to Norfolk we used to holiday on the south coast. I have seen swathes of cliff, roads and housing disappear into the sea around Hastings and recently Swanage became a victim of erosion (fortunately nobody was injured). This consultation document for which house building is its main purpose, I would suggest you go back to the government and request a great reduction in quotas. Norfolk and Suffolk are unlike other areas. You have grade one farmland - an important bread basket for our nation - it is wrong to import food when we should be growing our own (not concreting over the farmland with housing). these</p>		

Respondent	Comment	Partnership Response	Changes Made
	<p>counties are important to species of wildlife, migrating here in both summer and winter, and our own native species some of which are only found in this area (butterflies etc). This area should be treated differently to other parts of the UK. You cannot allow it to be developed in the same way as Essex, urbanised from London to Southend and the coast. It has the Broads, it is of great importance to the survival of species, you must not let it be a victim of the governments (and all parties) housing policy. In 2019 I wrote to the government ministry of housing and our MP Brandon Lewis as I realised that it was build 1,000s of houses - mostly on green fields - making a healthy profit at everybody else's expense. In January this year I wrote to Boris Johnson enclosing, paperwork relevant to the Great Yarmouth area for planning applications. For some years now we have been the target of developers. Recently this little village of Filby had over 40 planning applications lodged. We already had 60 houses built - it changes villages completely, Filby is being ruined and still they want to build 10-15-30-60 at at time. On Filby sands last year out of season and one way only we had 58,00 vehicles pass our front door. We didn't have the sams to register the summer traffic, it was probably nearer 100,000! your local planning policies have consequences for us residents. Is it fair our quality of life should be ruined to accommodate government housing policy and developers? I have viewed the paperwork on the core strategy and further focused changes for Great Yarmouth. I have returned the statement if representation form and hope the secretary of states planning inspector will allow me to speak at the hearing sessions because I would like to bring to his attention how the Part 2 further focused changes to 2030 came into being, to accommodate large developments. Persimmon Homes 725 (now slightly less) but the design is such that you can remove a few trees and build on the rest</p>		

Respondent	Comment	Partnership Response	Changes Made
	<p>of Nova Scotia Farm. this was not an area in the sites for development - it is now - put so the developer could build freely without objection from the public! That's another 2,000 plus cars a day yo come through Filby on the A1064 and on the Norwich. Bradwell 600 dwellings, Gorleston 500 and another 11 dwellings - all coming under ADIA numbers 1- 9 and other under BR, GR6, HY1 and 071. These are listed in the further focused changes - however i found in other files what can be done! Rollesby site 36 - 15 units site 37 -40 units, site 90 1 unit, Site 9 - 4 units, site 320 - 10 units, site 322 - units, site 413 - 26 units, site 414 - 20 units, site 449 - 20 units. Filby site 10 - 60 units (they have an application in now for six 'gone to appeal' as it was refused planning). site 19 - 15 units, site 38 - 11 units, site 62 - 3 units, site 71 - 6 units, site 72 - 20 units, site 83 - 2 units, site 114 - 7 units, site 416 - 44 units, site 428 - 20 units. Some of these sites now have planning applications lodged! Additionally Martham and Ormesby St Margaret have been swamped with development applications as has Hemsby regardless of coastal erosion. I would suggest this is not a council with a local planning policy with the interest of the community at heart, but a council allowing developers access everywhere. For the future generations and nature you need to go back to the government and insist on a change to the building requirements issued for Norfolk and Suffolk - disobey them if necessary and stand up for the communities and future generations you will serve. Counties of concrete in an environmentally important area with the prospect of houses disappearing into the sea (Happisburgh and shortly it will be Hemsby) is a very stupid housing policy - not forgetting what the rest of us will lose. I hope my comments will make you think seriously at the housing policies you will be providing guidance on. I also ask that despite my opinions you will include me in any further correspondence on these policies.</p>		

Respondent	Comment	Partnership Response	Changes Made
	I also enclose some cuttings recently taken from the mercury about new housing applications, the volume may make you think about what is going on here. I have kept Filby paperwork as I use it to write to the council with my objection.		
Richard Adams	Reference Eyke 21, East Suffolk Council SCLP 12.50 - as I own the south east fence of the mixed use boundaries. - What are your plans for this issue?	The draft SPD is focussed on providing guidance for the implementation of coastal adaptation Local Plan policies, and does not provide guidance for other site allocations.	No change
Anglian Water Services Ltd (Stewart Patience)	No Comment	N/A	No change
Barton Willmore (Will Spencer)	No Comment	N/A	No change
Bidwells (Kate Hammond)	Please do not rule out coastal defence maintenance and improvements. This could be cheaper in the long run! We recommend there is working group established to include landowners to assist with the development of this document and provide more detail and explanation of the issues which are facing property owners and businesses in coastal areas. If you would like to discuss any of these points further please do not hesitate to contact us.	<p>The management approach to the coast (e.g. protect/hold the line, no active intervention etc) is set out in the Shoreline Management Plans, and the SPD cannot change this.</p> <p>The local authorities are undertaking work for potential new protection schemes (at Hemsby, for example) and in some cases, rollback will not be the preferred solution.</p>	No change
Bourne Leisure Ltd (Lichfields)	The coastline covered by the SPD supports a tourism economy of regional importance. In Great Yarmouth alone, where Bourne Leisure has its holiday parks, tourism is worth £625 million per annum and accounts for 35% of all jobs. It is important that existing holiday parks in coastal locations are assisted by policy and guidance to ensure they can respond to circumstances, including coastal change, to maintain a quality service to their guests, continue attracting visitors and contributing to the local tourism economy, and to give operators confidence to plan for the future of their parks. This needs to be acknowledged in the opening section of the	<p>The importance of camping and caravan parks to the coastal economy is fully recognised by the Partnership.</p> <p>The draft SPD follows policy in providing that temporary development may be appropriate in the CCMA provided a number of criteria are met, including that such temporary development proposals are supported by a compliant Coastal Erosion Vulnerability Assessment.</p>	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>SPD, to establish this important context. Principally, Bourne Leisure has four other key points that it requests are considered by the Councils in preparing the Coastal Adaption SPD. These are addressed in turn below. 1. Identify caravan holiday parks as being appropriate in coastal locations We note that the proposed content for the SPD includes a section on development in the Coastal Change Management Area (CCMA). Pg 2/3 18907555v2 We responded to the Great Yarmouth Local Plan Part 2 review recently in May 2020. The draft document has been submitted by the Council for Examination and includes a specific policy (GSP4, 'New Development in Coastal Change Management Areas') that identifies a CCMA and development considered appropriate within the area. This approach is consistent with National Planning Policy Framework guidance (NPPF, paragraph 167). In the Great Yarmouth example, parts of Caister-on-Sea and Hopton Holiday Parks are located within the CCMA and Seashore Holiday Park is directly adjacent to the CCMA. We endorsed the draft policy identifying holiday and short-let caravans as representing appropriate development that could be provided along the coastal strip in Great Yarmouth. This form of tourist accommodation and use of land by its nature is inherently more flexible, with the ability to easily relocate caravans and adapt caravan developments to respond to changing coastlines over time. In view of this, park operators may accept temporary planning permissions that allows development to be reviewed in light of the actual rate of coastal change. In this way, it is different from other forms of 'permanent' development, such as residential development, and it is appropriate that this is recognised in development plan policy and guidance in the Coastal Adaption SPD. 2. Allow operators to protect their properties from coastal erosion Tourism operators should be allowed to protect their</p>	<p>The SPD cannot create or change policy in the coastal area – this is reserved for Shoreline Management Plans and Local Plans. However, the SPD will provide assistance in the interpretation and implementation of relevant Local Plan policies and there have been a number of good case studies in recent years showing how councils can work with park operators to best manage coastal erosion threats. Ad hoc coastal defence works must be considered in light of the SMP policy due to the potential for unintended consequences on other parts of the coast.</p>	

Respondent	Comment	Partnership Response	Changes Made
	<p>properties by investing in maintaining existing flood defences or providing new defences. This way private landowners are not dependent on public sector plans and investment to provide new or improved coastal defences, and initiatives can be led and funded by the private sector, as required and appropriate. We consider this principle should apply even in circumstances where such flood defence works are not provided for in Shoreline Management Plans (SMP). Otherwise this could mean that essential, urgent coastal protection works are delayed, potentially for a significant period, until the SMP has been updated, which in reality could take years. In such cases, the planning application proposal for the flood protection works would need to be justified and demonstrate that there would be no unacceptable adverse impacts further along the coastline. They would also need to be in general accordance with the development plan, SMP principles and SPD guidance. The application would be consulted on through the statutory planning application processes, including engaging with affected landowners, the Environment Agency, and Suffolk coastal authorities if necessary. This way all relevant responses can be considered before a decision is made. This process will be more expedient than reviewing the SMP.</p> <p>3. Promote “roll-back” and relocation Whilst coastal defences play an important part in responding to coastal erosion, they are sometimes impractical or unviable. This is where the second strand of NPPF paragraph 167 provides a solution for development and infrastructure that is at risk, by making provision for these to be relocated away from CCMAAs. Many coastal planning authorities adopt so-called “roll-back” policies as part of their development plans to proactively manage the hazard of coastal erosion. Indeed, Great Yarmouth Council in its Local Plan Part 2 review includes a draft policy (Policy E2 ‘Relocation from Coastal</p>		

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

Respondent	Comment	Partnership Response	Changes Made
	<p>heart of the coastal adaption strategy; informed by the SMP but with this being considered in the overall balance of objectives for the coastal areas. In future, the SMP must be consulted upon publicly prior to it being published, in the same way that draft development plans are, so that those affected by the coastal defence management policies are given the opportunity to comment. We trust this representation is clear and will be considered in formulating a draft of the Coastal Adaption SPD. Please do not hesitate to contact me or my colleague should you require any clarification of the points made. We would be grateful if you could keep us informed of progress on reviewing the SPD.</p>		
<p>Michael Boon</p>	<p>I consider that it is wise for the local authorities who have coastal responsibilities to take a long holistic approach of the coastline as their boundaries on the coast will not align with the specific coastal problems within Shoreline Management compartments. It is essential for the economic well-being of the coastal communities that local authorities tried to maximise the practical needs of villages and settlements within their areas affected by coastal erosion. It is wise to have forward planning on each of the designated SMP coastal compartments as change is accelerating and measures to address this will affect the landward community. It's also necessary to have adaptability in any forward plan to cater for accelerating change caused by significant increased coastal erosion in places and longer-term problems which would be driven by climate change A properly prepared and flexible coastal adaption planning document can be a significant source of information for both residents and developers and can link into each Local Authority's development plans having regard for the Shoreline Management Plans overarching frontal role. It is essential that the Local Authorities planning roles addresses the fact of the impact of coastal change in erosion in the</p>	<p>Shoreline Management Plans make the decisions on the management of the coast and cover wide areas (based largely on self-contained sediment 'cells') and much of the information provided is beyond the powers of the SPD to take into account (which cannot create new policy or management approach to the coast). However, an understanding of the coastal processes along this part of the Norfolk and Suffolk coast, as well as the relationship between the SPD and the SMPs is set out in the draft SPD.</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>context of significant flood protection change to the lands which lie within its area which might suffer in the event of frontal collapse. The Local Authorities should require evidence to support the economic case where necessary to be made to government to support protection of coastal communities threatened by erosion of the frontal defences</p> <p>2 Coastal Change is an inevitable part of a dynamic coastline. This presents a challenge in planning for the appropriate management of our coastlines. The risk of coastal flooding and vulnerability to erosion along the coast does not respect Local Planning Authority boundaries, and therefore coastal change needs to be considered across a wide geography. There are significant potential benefits to joint working across administrative and professional disciplines in addressing the issues of coastal management and planning.</p> <p>3 Links to Shoreline Management Plans (SMPs) I believe that Shoreline Management Plans ,broken into compartments in Norfolk and Suffolk with continual monitoring, are essential organisations to provide early warning on coastal change which might need remedy by defence . The type of defence needed will vary according to the landscape of the shoreline and the type of tidal attack experienced. The Shoreline Management Group needs to be able to take advantage of the latest research available and have access to coastline modelling to be able to work with the Flood Defence Authority in providing coastal defence. Contact with the University of East Anglia may be valuable in this context. Each of the compartments in the eastern and western halves of SMP's could have different needs. It is important to take a broad view of the coastline when installing any coastal defences to consider whether a length of defence would have an adverse effect on a compartment immediately downstream. This would argue for compartments being looked at not only for their own needs but for those</p>		

Respondent	Comment	Partnership Response	Changes Made
	<p>adjacent to them. I comment further on some examples in an appendix to my response. 4 Proposed Content of the SPD</p> <p>1. Context: Homes, Businesses, and Communities Affected by Coastal Change A balanced policy of funded protection if it is available, consideration of moving landward sites and managed retreat in the context of increased tidal surges and climate change will need to be considered. 2. Coastal Management Measures and Policies A collection of both local and national powers may well be needed to be melded to protect the coast and to make the case for funding if a single set of powers locally does not qualify the obtaining of funds for necessary needs. 3. Development in the Coastal Change Management Area Within the Coastal Change Management Area, the current baseline of areas, likely to be subject to physical change of the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion, must be kept up-to-date along the eastern and western Shoreline Management Areas. Trends leading to vulnerability need to be monitored. Consultation after assessment would need to be made on a rolling basis between coastal Local Authorities and the Shoreline Management Organisation to come up with a joint view in all areas, after full consideration, to negotiate with the environment agency. Vulnerable areas in a time of increasing tidal surges should be identified and the best practice of managing an appropriate coastal defence when necessary needs to be explored on a cost benefit basis. 4. Roll-back and Relocation Options Roll-back and relocation involves the movement of assets currently or soon to be at risk from coastal change Significant assets such as lighthouses at Happisburgh and Orford or Martello Towers along the coast would be key targets for assessment of the movement to less vulnerable locations. Other examples might be coastal holiday cottages now too close to the</p>		

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

Respondent	Comment	Partnership Response	Changes Made
	<p>after the storms of the last few winters. The complexity of a policy which ranges from hold the line to managed retreat is constantly being needed to be reviewed as tidal attack on the frontage becomes more severe and the effects of climate change become more apparent. The varying types of coastline within the area being reviewed does not respect existing administrative boundaries and this means that there needs to be cooperation between the responsible planning authorities who may have more than one type of coast within their administrative areas. This provokes the need for joint working but equally invites the local authorities to be consulted in the type of frontal defence being recommended by the flood defence authority. In the past there has been too much piecemeal defence on vulnerable sections of the coast and it is evident that a protection scheme of a particular type might be desirable for a short section of the coast but inevitably has a downstream effect on other sections of the coast which are not similarly protected. Vast quantities of sand are moved down the coast by the tide and there is a complex arrangement between the coast and the offshore banks which makes prediction of erosion and the position more difficult without the assistance of complex hydraulic models. There have been occasions in the past where sections of coastline needing protection have been addressed by flood protection structures utilised elsewhere in the country and it has been found at a later date that a particular type of scheme which suits one area of coast is not wholly efficient on another. I would cite in this respect the fishtail groynes utilised in the Happisburgh to Winterton early scheme which were of a similar type to that used in Jaywick in Essex. The two areas needing protection on the landward side are very different with the flatter coastline at Jaywick, which suffered considerably in the 1953 floods ,giving rise to the need to protect the small holiday resort</p>		

Respondent	Comment	Partnership Response	Changes Made
	<p>from a sea ingress into lengthy marshes behind the coast. The coastal regime between Happisburgh and Winterton is that of low cliffs which are very subject to erosion and whereas sand can be trapped in the fishtails in the immediate locality beyond the southern extremity of the other fishtail groyne’s erosion would bite in the coastal compartment beyond. I do not believe that the Happisburgh to Winterton scheme was hydraulically modelled to any extent but was based on practical experience of the use of fishtail groins elsewhere. With the coastline between Holkham and Felixstowe now even more under frontal attack a broad hydraulic model which could be broken down into compartments would be highly desirable if one exists. It may well exist but it has the need of being updated with options, especially those arising from storm surges which now occur far more frequently than in the assessed 1 in 200 critical baselines to provide a satisfactory defence in the current circumstances and for the future. When the Rivers Authority was responsible for both land drainage and flood defence ,and many of the Board’s members had agricultural interests, it was anathema to talk of any retreat from the frontal defences or utilisation of flood overspill areas since defence itself was the main object at that time. Thus, the wide discussion of using the Haddiscoe Island marshland area above Breydon water to act as a mirror image flood overspill area for Great Yarmouth and the surrounding area was not proceeded with. The option lies on the table still. Times have changed now; tides are higher and it is more difficult to use the same criteria in developing frontal defences. Climate change has led to an evaluation of the value of land behind the coastal defences which has become the criteria for obtaining capital funds for frontal defence. Marshes at a low land level have been candidates for managed retreat which also has environmental benefits for</p>		

Respondent	Comment	Partnership Response	Changes Made
	<p>birdlife and ecology. Coastal settlements on the top of low cliffs in areas such as Happisburgh, Winterton, Hemsby and Scratby with scattered dwellings close to the clifftops now struggle to meet the criteria to obtain appropriate funding for their coastal defence. There are of course wider considerations in the area. Perhaps that of Horsey where the defences of a series of low dunes are held together by marram grass. The area was over- topped in the 1953 floods with a considerable ingress of the sea across the marshes well inland. That flood surge, together with that of 1912, needs to be held in the memory in the present situation of sea-level rise and climate change. The Hundred Stream which is currently truncated behind the dune level originally reached the sea in the mediaeval past as a branch of the river Thurne. Salt ingress under the dunes in this area penetrates down the channel in the time of tidal surges and take some years to disappear from the landscape . In a period of sea-level rise and more frequent tidal surges if the dune wall was breached in this area again the sea ingress could run towards Potter Heigham. The North beach at Great Yarmouth would appear on most occasions to be stable and held together by Marram grass in the dunes but it is noted that in severe storms in the last winter the sea surge ran as far as the promenade wall again overtopping much of the beach. I was the architect of Great Yarmouth Outer Harbour scheme which was model tested both at the Hydraulic Research Station in Wallingford and also the Delft Hydraulics Laboratory in the Netherlands. Extensive studies were carried out to see what the effect would be downstream and I was satisfied at the time that Gorleston Beach would accrete. This has proved to be the case. However, at the very far end of the Gorleston promenade, where lesser sand had accumulated in the historic past this remains the case. The vulnerability of the cliffs at Hopton</p>		

Respondent	Comment	Partnership Response	Changes Made
	<p>and Corton arises from a lack of offshore sandbanks to prevent direct wave attack from the East. I think it will be necessary in the future to provide some further sea defence for the Outer Harbour offshore of the entrance to the port as my original design, hydraulically tested provided for an overlapping breakwater to the North. Another solution would be to place in the future an offshore breakwater in deeper water clear of the entrance protecting the entrance itself, such as at Dover, which would both assist navigation and also act as a sea defence from storm waves from the East over the offshore banks. Within the river port of Great Yarmouth itself I often conducted joint schemes with the then flood authority which was Anglian Water. The joint schemes involved the third when the Port Authority wished to re-pile its quays with sheet steel piling. On these occasions an additional height to protect the land behind the quays was contributed to by the flood defence authority thus benefiting both organisations. In terms of local authority planning I remain concerned about the protection given to the West bank of the river within the tidal River Yare at Gorleston and Southtown. The river frontal defences are not high and the land behind the quays is generally low lying. Great Yarmouth is at risk to a local effect here in that in surge tide conditions one flood tide can be succeeded with another on top of it without a significant ebb. This can result in overtopping of the defences in Gorleston and there is a strong possibility of outflanking the frontal defences by ingress of high tides along Riverside Road putting the lower part of Gorleston at risk. This certainly needs to be addressed at Local Authority planning level in considering the interaction between adequate defence and protection of existing businesses. I noted that during the recent in Inspector’s Examination in Public of the proposal for a Third River Crossing of the River Yare in Southtown at Great</p>		

Respondent	Comment	Partnership Response	Changes Made
	<p>Yarmouth the question of the constraint on tidal flows of the river resulting from the projected bridge piers built into the river bed but was raised. It was admitted by the Norfolk County Council, the schemes proposers', that the tidal flow would be reduced by 36% because of the structure within the river. This of course would add to the inability of a surge tide to pass this point and the backing up of the incoming tide would exacerbate the potential flooding in lower Gorleston over the flood defences. Further to the south areas such as that of Covehithe are historically extremely vulnerable in that the high soft cliffs are retreating rapidly inland. I suppose this would be considered an area which would not warrant investment to protect further cliff collapses on grounds of economic assessment. However, in the north of the eastern compartment the cliffs in areas such as Cromer, Sheringham, Overstrand and Trimmingham are vulnerable to water weight retained in the land at the top of the cliff which can cause unexpected collapses. Significant collapses of this type can also be seen elsewhere in the country such as at the cliffs of Burton Bradstock immediately north of West Bay in Dorset. In a period of increasing rainfall, I wonder is possible to provide some piped draining through these cliffs both to stabilise and to prevent the risk of such heavy collapses. Finally, I turned to the protection provided for the nationally important gas terminal at Bacton by sand feeding. I noted that the recommendation was made by Dutch contractors. During the development stage of planning the Outer Harbour I looked at the coastal reclamation scheme which was the brainchild of Ronald Waterman a Dutch engineer and specialist in coastal hydraulics. I arranged for him to come over to Norfolk and he gave a presentation on his scheme for reclamation in the Netherlands which had envisaged protection of the coastal zone zones stretching from Hoek</p>		

Respondent	Comment	Partnership Response	Changes Made
	<p>van Holland to Scheveningen, the extension of the Port of Rotterdam in the Maasvlakte, and also near the extension to the ports of IJmuiden/Amsterdam. The alignment of the Netherlands coast is broadly north-west to south-east whereas that in Norfolk is convex. Dr Waterman was asked at the time, and this was back in the 1980's, whether a similar scheme for coastal defence could be applied in Norfolk. He made the comment of the different shapes of coastline between the Netherlands and Norfolk and cited the effect on movements of sand. The sand feeding of vast quantities of sand in front of Bacton may well provide temporary relief for the terminal but as has been recently seen the sand can be heavily mobile and has been carried south in recent storms into Sea Palling. Further investigation I feel is needed here for the long-term stability of this stretch of coastline.</p>		
<p>Norfolk Constabulary</p>	<p>I have asked NPS Group to send a reply for and on behalf of both Norfolk Constabulary and Suffolk Constabulary.</p>	<p>Comment noted.</p>	<p>No change</p>
<p>RSPB (Ian Robinson)</p>	<p>The scale of change predicted for the coast is immense. Conservation organisations have or are developing landscape-based proposals – RSPB Priority Landscape plans, Wildlife Trust Living Landscape plans. These plans look at integrating and expanding management for nature in accordance with the Lawton principle i.e. bigger, better and more connected. Integral to this land management and habitat connectivity is the need to connect people with nature and enable access to existing and ‘newly created’ countryside. Guidance must be available to developers on how best to create access without diminishing the value of the landscape i.e. creating access routes within an area, which fragment that area and discourage wildlife from making best use of the landscape.</p>	<p>The draft SPD recognises the importance of protecting and enhancing the natural environment as well as providing public access to the coast and the countryside, particularly in relation to rollback and relocation development.</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
<p>Natural England (Victoria Wight)</p>	<p>Objectives, page 1. It is important that objectives are long term, sustainable and have positive outcomes for coastal communities, land and property owners, but also nature and environment. Coastal management can provide opportunities for natural capital and ecosystem services which contribute to erosion and flood risk reduction, as well as adaptation for local communities. Section 3. We recommend that this Supplementary Planning Document (SPD) is informed by the ongoing Shoreline Management Plan (SMP) review and that relevant changes are taken into account. Marine plans should also be considered and further information can be found here. Section 4, point 1. We suggest the creation and implementation of a strategic communication plan to facilitate engagement with communities vulnerable to coastal change. This could be used to raise awareness by de-mystifying coastal change and explaining coastal process. Section 4, point 3. Development in the Coastal Change Management Area. This could also be providing guidance as to appropriate development that could impact on wildlife interests, especially (but not limited to) protected sites, which are vulnerable to human disturbance, coastal erosion and other climate-change influenced impacts. This is also highlighted in the shared aims of the Statement of Common Ground in Coastal Zone Planning for the Norfolk & Suffolk Coastal Authorities (Appendix 1, page 8) which states “to protect the coastal environment, including nature conservation designations and biodiversity”. Section 4, point 4. There needs to be a cultural change in how coastal adaptation is perceived, roll-back can be seen in a negative light however it is important to demonstrate how it can be a positive adaptive measure. As stated previously, coastal management can provide opportunities for natural capital and ecosystem services which contribute to erosion and flood risk reduction, as well</p>	<p>The draft SPD recognises the importance of the natural environment to people, communities and businesses.</p> <p>The draft SPD provides guidance concerning the relationship between the SMP, Local Plan policies, Marine Plans, national policy and various other policy and guidance documents.</p> <p>The draft SPD focusses primarily on coastal change resulting from erosion of the coast rather than flood risk. However, flood risk is of course a significant issue in many coastal locations.</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>as adaptation for local communities. Opportunities should be sought to explore habitat enhancement and creation through coastal adaptation, to make space for nature and to provide room for the coast to function, so that ‘if we help it, it will help us’. Coastal flooding and erosion management could also be used to aid nature recovery and this is something that Natural England are keen to explore with Coast Partnership East and would welcome a conversation over the coming months. Section 5. The SPD, in conjunction with the relevant SMP’s may be able to provide a strong steer and presumption against any development that increases flood and erosion risk to people, and in turn put pressure on wildlife sites and coastal processes.</p>		
<p>North Norfolk District Council (Planning Policy Team)</p>	<p>Thank you for the opportunity to comment on the initial consultation documentation associated with the production of a joint Coastal Adaptation SPD. Please find our below an Officer level response.</p> <p>The emerging North Norfolk Local Plan has two coastal policies, SD11: Coastal Erosion and Policy SD 12: Coastal Adaptation, which are currently being finalised ahead of Regulation 19. As a Coast Protection Authority, involved in the creation of the SPD, we wish to offer our full support in providing a joint document that will support and inform our emerging coastal policies.</p> <p>For NNDC, it is particularly important that the joint SPD should usefully address:</p> <ul style="list-style-type: none"> - clearly set out the national and strategic frameworks and the Local Plan Policies that influence coastal change along the coastline, as well as informing which and how different organisations are involved and how their roles and responsibilities interconnect; 	<p>Support noted. The draft SPD provides a policy context section that sets out the various national and local policy and guidance documents relevant to coastal adaptation, ranging from Local Plan policies to marine planning and SMPs. This chapter is supported by an appendix that sets out the roles and responsibilities of organisations acting on the coast.</p> <p>The draft SPD is supported by a glossary which provides definitions for key terms, and the draft SPD has also be written in plain English to ensure it is accessible to as many people as possible.</p> <p>The circumstances when temporary development would be appropriate within the CCMA and requirements relating to the preparation of a Coastal Erosion Vulnerability Assessment are set out in the draft SPD.</p> <p>The draft SPD also contains guidance relating to the implementation of rollback and relocation policies,</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
	<ul style="list-style-type: none"> - give full explanations of the coastal terms used, for example, coastal erosion, coastal adaptation; - explain what types of temporary development would be appropriate within the 50 year and 100 year epochs of the areas designated as Coastal Change Management Areas; - inform what is the required content for a Coastal Erosion Vulnerability Assessment, giving proportionate examples/ template; - give further guidance on the protection and replacement of coastal infrastructure; (such as roads) - provide case studies for each area covered from our collective authorities, such as the innovative sandscaping scheme at Bacton, but also use examples from further afield, both nationally and internationally; - as part of the roll back/ relocation options, set out the likely requirements with regard to mitigation and how planning conditions and legal agreements should be used to ensure biodiversity/ environmental net gain. 	<p>and is supported by a number of coastal adaptation best practice case studies.</p>	
<p>Holkham Estate (Peter Mitchell)</p>	<p>I support the approach and have no suggestions to make which would improve it. My concern is that, going forward, Holkham Estate is included in subsequent stages of this project – in the development of the full SPD draft and in particular the criteria around enabling developments. It is a concern that studies needed to firm up the Conditional Policies in SMP5 remain outstanding as these are key to the long-term planning that is so important to owners of low-lying land on the coast.</p>	<p>Whilst the SPD cannot alter SMP policy, developing workable guidance on enabling development forms part of the draft SPD.</p>	<p>No change</p>

Appendix 4: Draft consultation promotion material

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Examples provided by East Suffolk Council:

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Have your say on a new planning document which provides guidance for communities which may be affected by coastal change.

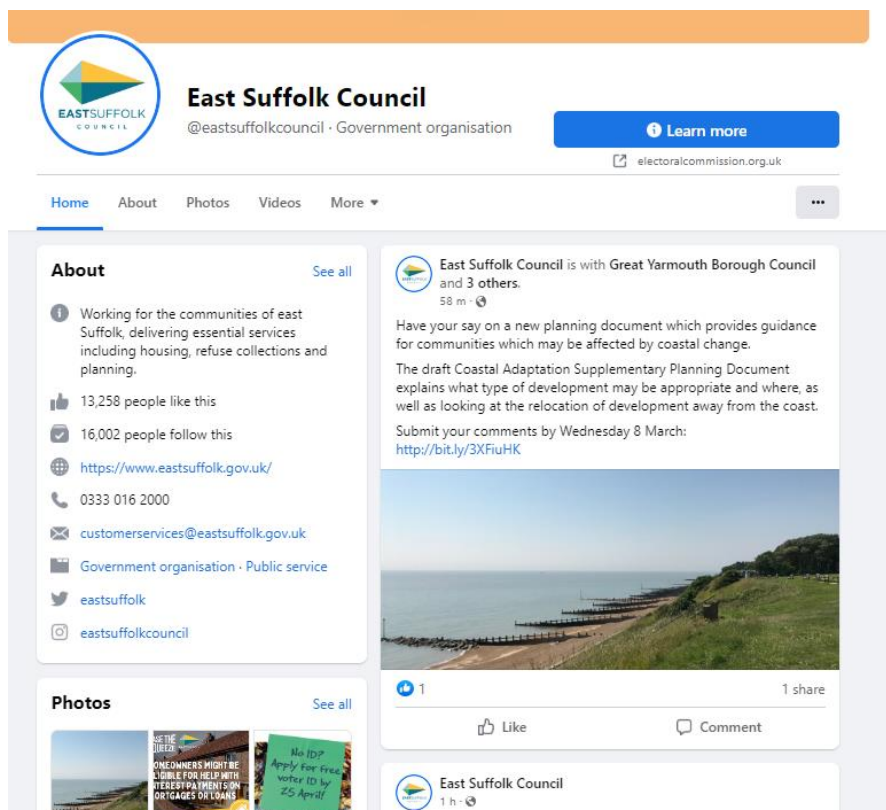
The document explains what type of development may be appropriate and where.

Submit your comments by Wednesday 8 March:
bit.ly/3XFiuHK



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Have your say on a new planning document which provides guidance for communities which may be affected by coastal change.

The draft Coastal Adaptation Supplementary Planning Document explains what type of development may be appropriate and where, as well as looking at the relocation of development away from the coast.

Submit your comments by Wednesday 8 March:
<http://bit.ly/3XFiuHK>

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Have your say on a new planning document which provides guidance for communities which may be affected by coastal change.

The draft Coastal Adaptation Supplementary Planning Document explains what type of development may be appropriate and where, as well as looking at the relocation of development away from the coast.

Submit your comments by Wednesday 8 March:
<http://bit.ly/3XFiuHK>




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Have your say on new planning document

Posted by on 23 January 2023 | [Comments](#)

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

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

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

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

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

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

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

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

This consultation is now closed.

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

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

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





Have your say

Draft Coastal Adaptation Supplementary Planning Document

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

What are we doing?

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

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



How can you get involved?

GIVE YOUR VIEWS

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

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



Find out more and give your views:

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

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

planningpolicy@eastsuffolk.gov.uk

01394 444557 / 01502 523029

Appendix 5: Draft consultation responses

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

Chapter 1 Introduction

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made												
Paragraphs 1.1 - 1.4	Bourne Leisure (Lichfields)	163	<p>Summary</p> <p>Overall, it is considered that the draft SPD has taken a pragmatic approach to balancing the needs of supporting coastal development and the local economy, whilst ensuring adequate provisions are in place to respond to coastal change. We therefore hope the key elements of the draft SPD commented on above will be retained in the next version of the document.</p>	Comment noted	No change												
Paragraphs 1.1 - 1.4	British Pipeline Agency Ltd (Lands Department)	37	<p>Dear Sir/Madam</p> <p>Bacton to North Walsham Pipelines - Affected Consultation</p> <table border="1"> <tr> <td>Our Ref</td> <td>2023-6527</td> </tr> <tr> <td>Your Ref</td> <td></td> </tr> <tr> <td>Linesearch Ref</td> <td></td> </tr> <tr> <td>Location</td> <td>633196, 334708 Holkham in Norfolk to Felixstowe in Suffolk Norfolk and Suffolk</td> </tr> <tr> <td>Work Description</td> <td>Development in coastal locations, relocation of development away from coastal locations, and enabling development. BPA only affected in the area of Paston - Bacton to North Walsham Pipeline.</td> </tr> <tr> <td>Technician Area</td> <td>BAC-NWA</td> </tr> </table> <p>Thank you for your enquiry regarding the Draft Coastal Adaptation.</p>	Our Ref	2023-6527	Your Ref		Linesearch Ref		Location	633196, 334708 Holkham in Norfolk to Felixstowe in Suffolk Norfolk and Suffolk	Work Description	Development in coastal locations, relocation of development away from coastal locations, and enabling development. BPA only affected in the area of Paston - Bacton to North Walsham Pipeline.	Technician Area	BAC-NWA	Comment noted	No change
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Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>This consultation affects the pipeline system operated by BPA (Bacton to North Walsham Pipeline) in the area of Paston only. Please find attached our GIS map. Before any work (including hand trial holes) starts on site you must consult with BPA. Email landsteam@bpa.co.uk to arrange a free site meeting with one of our Technicians.</p> <p>Your safety is paramount to BPA. In order to protect you from potential injury or death we ask that this safety information is passed to the person that will be carrying out the work.</p> <p>BPA regularly monitor the pipelines and we ask that the following procedures are observed:</p> <ul style="list-style-type: none"> • Before any work (including hand trial holes) starts in the vicinity, a BPA Technician must locate and mark the pipeline(s) on site. • All works within 6m of the pipeline require prior approval by BPA and a BPA Technician must supervise all works within 6m of the pipeline(s). The technician will determine whether a written method statement is necessary before any works proceed. • BPA require a minimum of 7 days’ notice to arrange supervision (under normal circumstances). • Heavy vehicle crossing points to be approved before use across the easement. • Any works involving the exposure of the pipeline/s requires a continuous site presence until backfilled (this may mean a security arrangement out of hours). • BPA may require proof of liability insurance depending on the proposed works. • Utility crossings may require a formal crossing consent 		

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

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

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

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

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

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>place so that parishioners can understand implications better</p> <ol style="list-style-type: none"> 2. Parishioners are generally critical of all the investment in studies, reports etc over a period of decades, with very little in the form of activity 3. Parishioners are concerned by the quantity of masonry on the beach and are keen to see properties removed before they create debris on the beach 4. Many parishioners are keen to see the car park rolled back away from the beach as soon as possible before erosion also removes the current car park 5. Parishioners note that no additional properties should be built on the seaward side of the main road 6. Parishioners are concerned for the distress and anxiety involved in the loss of parishioners' homes and the concern that they will not receive compensation. 7. There is a lack of clarity to parishioners as to how much compensation could be received. 8. There is a general lack of understanding regarding CTAP 9. Parishioners note that the houses built to replace the Beach Road houses that were demolished are not 'replacement's' as they were expensive and many have been sold as holiday homes 10. Some parishioners have noted concerns with the erosion of the cliffs at the old caravan park in Happisburgh, where there are still buildings remaining 11. Fundamentally, many parishioners have written to say that they do not understand the document 12. A parishioner has pointed out to the Parish Council that if the sea breaks through the cliffs at Doggett's Lane in Happisburgh, it will flood the Norfolk Broads 13. A parishioner points out the economy and hidden economy within the village, taking into account the 	<p>scope of the SPD to consider/address, but it is agreed (point 3) that properties should be demolished before they collapse. There is no compensation for loss of properties to erosion (point 7), as stated in paragraph 5.6.</p> <p>Further information on the CTAP project will be published publicly over the coming months.</p>	

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
			<p>income made by holidays homes & Airbnb’s, the caravan park, the jobs associated with them, the cleaners, gardeners & handymen this adds up to a large source of money within the local economy, then on top of this the visitors who rent these and visit the village spend money via the shops & pub and artisan crafters who sell via studios from their homes. All this contribution to the economy would be lost if Happisburgh is lost to the sea</p>		
<p>Paragraphs 1.1 - 1.4</p>	<p>Historic England (Marsh, Andrew)</p>	<p>152</p>	<p>Thank you for consulting Historic England on the Councils’ Draft Coastal Adaptation Supplementary Planning Document. As the government’s adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account when preparing strategies and plans, given that heritage assets are an irreplaceable resource.</p> <p>While we have no specific comments to make, we welcome the preparation of this SPD (including it’s numerous references to the historic environment), and will be interested in receiving subsequent consultations on this and related documents.</p> <p>CONCLUSION</p> <p>Finally, we should like to stress that this response is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise as a result of this plan, where we consider that these would have an adverse effect upon the historic environment. If you have any questions with regards to the comments made, then please do get back to me. In the</p>	<p>Comment noted</p>	<p>No change</p>

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Chapter 3 Coastal Management Measures and Policies

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

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

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

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

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

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

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

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

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

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

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

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

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

Chapter 4 Development in the Coastal Change Management Area

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Chapter 5 Rollback and Relocation

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

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

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

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

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

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

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

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

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

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

Part	Respondent Name	Comment ID	Comment	Partnership Response	Change Made
	(Georgia Teague)		<p>‘reduce the potential for isolated dwellings in the countryside’ as detailed within paragraph 5.10.</p> <p>SCC also support paragraph 5.14, recognising the “preference for all sites to be able to access the nearest settlements and facilities safely and where possible via non-motorised travel modes”.</p> <p>SCC would suggest including specific provisions for the needs of residents who are most vulnerable and within the short-and medium-term erosion risk areas. This could include those who are elderly, disabled, and/or living with neurodiversity: For example, the SPD could, in relation to areas or land intended for enabling sites for rollback or relocation, specify the need to ensure developments create elderly, frailty, blind/poor sight, neurodiversity and dementia-friendly neighbourhoods that consider aspects such as: wheelchair/reduced mobility accessibility and distinctive signage for neurodiversity and dementia with inclusive community design e.g.;equality of access for all disabilities including deaf and blind.</p> <p>Paragraph 5.13 refers to occupiers of the rollback accessing facilities in their new location. It is suggested that the paragraph is extended to accommodate those with additional needs:</p> <p>“In simple terms this means that in interpreting the policy, the applicant will need to clearly demonstrate that the occupiers of the rollback or relocated dwelling will not be disadvantaged with respect to accessing facilities (e.g, primary school, food shop, bus services, employment opportunities etc) than the location the original dwellings was in; and where possible, demonstrate an improved level of access to such facilities. This</p>	<p>Comment noted and welcomed.</p> <p>The comments on the need to plan appropriately particular categories of residents (elderly, disabled etc) are noted. However, there are other relevant Local Plan policies (for example, Policy WLP8.31 (Lifetime Design) in the Waveney Local Plan) and the NPPF which cover this territory and so it is outside the scope of the SPD.</p>	

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Chapter 6 ‘Enabling’ Development

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix 2 Organisation Roles and Responsibilities

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

Appendix 3 Coastal Erosion Vulnerability Assessment (CEVA) Template

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

Appendix 4 Case Studies

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

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

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

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

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

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

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

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

Appendix 5 Example Conditions

No responses received

Appendix 6 Neighbourhood Plan Guidance

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

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

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

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