

Consultation Statement

Draft Coastal Adaptation Supplementary Planning Document

October 2022



Contents

- Introduction 3
- Who was consulted?..... 4
- How were they consulted? 4
- What were the main issues raised during the initial consultation?..... 5
- Appendix 1: Initial consultation social media posts 7
- Appendix 2: Consultation bodies 8
- Appendix 3: Initial consultation responses 10

Introduction

This draft 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. The draft consultation on the draft SPD will be held for 6 weeks between 9 January and 20 February 2023.

This Consultation Statement has been 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 which is to be held between 9 January and 20 February 2023. After which the Consultation Statement will be amended to take account of responses submitted to the formal consultation prior to adoption.

Who was consulted?

The initial consultation sought to provide interested parties with the opportunity to comment on the proposed broad content of the SPD, as set out in the initial consultation document¹.

All of those registered on the Partnership's respective council planning policy mailing lists were consulted. The initial consultation was also made available on the Partnership's respective council websites, and publicised via social media and a press release in order to achieve as wide a response as possible and give members of the public the opportunity to comment on the proposed broad content of the SPD regardless of whether they had signed up to a council mailing list.

How were they consulted?

The initial consultation documents, over the 6 week initial consultation between 4 September and 16 October 2020, were made available on the East Suffolk Council website (with links to the Est Suffolk Council website from other Partnership websites). The initial consultation document can be viewed here:

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

The consultation was also advertised via the Partnership's respective social media accounts (see Appendix 1). The initial consultation document, available at the above link, provided background information to the consultation and asked a series of questions. Hard copies of the document were also 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 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?

¹ <https://eastsuffolk.inconsult.uk/consult.ti/coastaladaptationspd2020/consultationHome>

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: [INSERT INOVEM LINK](#)

What were the main issues raised during the 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.

Appendix 1: Initial consultation social media posts



Appendix 2: Consultation bodies

The following organisations and groups were consulted at the start of the initial consultation.

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 (within the aforementioned local authorities) 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 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</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</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>considered as being appropriate to justify a variation in 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>necessary to include details of emergency cases: 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>

Respondent	Comment	Partnership Response	Changes Made
Andrew McDonald	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 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.	The SPD will within its context chapter, set out the affects that coastal processes and policies can have on the natural environment. 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.	The SPD sets out the impacts of coastal processes and planning 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	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.

Respondent	Comment	Partnership Response	Changes Made
Barton Willmore (Will Spencer)	<p>provided by Anglian Water and • existing infrastructure including ports within the area and energy generation</p> <p>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 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</p>	Support noted. The SPD does not wish to restrict appropriate development at the coast. However, certain development types will normally be 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.	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>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 management plan to address potential impacts on coastal processes.</p>		
<p>Bidwells (Kate Hammond)</p>	<p>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.</p>	<p>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.</p>	<p>No change.</p>
<p>RSPB (Ian Robinson)</p>	<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</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>	<p>The SPD sets out the impacts of coastal processes and planning policies on the natural environment.</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>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 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 they may affect coastal management and adaptation policies.	No change.
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	No change.

Respondent	Comment	Partnership Response	Changes Made
		implementation of coastal adaptation planning policies.	
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
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.

Respondent	Comment	Partnership Response	Changes Made
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 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.	The SPD will provide guidance relating to the implementation of rollback and relocation policies, 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.	No change.
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	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?	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. 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.	No change.

Respondent	Comment	Partnership Response	Changes Made
Felixstowe Town Council (Ash Tadjrishi)	<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 use planning had traditionally been a separate topic. Four strands of law and regulation cover those issues, with Responsible authorities being:</p> <ul style="list-style-type: none"> • 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>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>
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</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</p>	<p>No change.</p>

Respondent	Comment	Partnership Response	Changes Made
	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.	by robust evidence and have been prepared in a manner that can then be more speedily determined.	
Lowestoft Cruising Club (David Bennett)	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.	The SPD will provide guidance relating to the implementation of coastal adaptation policies.	No change.
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.

Respondent	Comment	Partnership Response	Changes Made
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 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	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 Development Plan and National Policy. However, the SPD will provide guidance relating to the implementation of coastal adaptation planning policies.	No change.

Respondent	Comment	Partnership Response	Changes Made
	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.		
Anglian Water Services Ltd (Stewart Patience)	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.	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.	No change.
Barton Willmore (Will Spencer)	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 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	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 these relate to the Development Consent Order (DCO) procedure and not to planning applications for which the Local Planning Authority is the determining body.	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>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>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 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</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 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>The SPD will set out the importance of the natural environment and the impacts of coastal processes and planning policies on the natural environment.</p>

Respondent	Comment	Partnership Response	Changes Made
	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.		
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	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 biodiversity areas, and you make no attempt to explain the current position.	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.	No change.
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	No change.

Respondent	Comment	Partnership Response	Changes Made
		studies of coastal adaptation best practice. The SPD will, however, provide guidance relating to implementation of coastal adaptation planning policies.	
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 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.

Respondent	Comment	Partnership Response	Changes Made
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.
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	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	No change.

Respondent	Comment	Partnership Response	Changes Made
(Catherine Dew)		biodiversity and the natural environment where relevant to the implementation of coastal planning policies.	
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 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.	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
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	No change.

Respondent	Comment	Partnership Response	Changes Made
		implementation of coastal planning policies.	
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.
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	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	No change.

Respondent	Comment	Partnership Response	Changes Made
(Lesley Beevor)		implementation of coastal planning policies, which apply to all areas	
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.	<p>The Councils will ensure that the IDBs are being consulted on relevant applications</p> <p>The SPD will provide guidance in relation to which, and when, organisations should be consulted on development proposals under consideration by coastal planning policies.</p> <p>The SPD cannot not alter the CCMA as this is the role of Local Plans and SMPs.</p>	Provide guidance relating to which, and when, organisations should be consulted on development proposals under consideration by coastal planning policies.
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	No change.

Respondent	Comment	Partnership Response	Changes Made
		applications, the pre-application charging process is available and recommended	
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 '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/ .	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.

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	No change.

Respondent	Comment	Partnership Response	Changes Made
		taking account of consultation responses the Partnership Authorities will prepare and consult on the Draft SPD.	
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 berelevant to Pettistree as the 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.
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.	No change.

Respondent	Comment	Partnership Response	Changes Made
		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.	
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.
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	No change.

Respondent	Comment	Partnership Response	Changes Made
		planning policies. Other Local Plan and NPPF policies cover development potentially affecting nationally designated areas.	
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
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

Respondent	Comment	Partnership Response	Changes Made
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 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 SPD will within its context chapter, set out the affects that coastal processes and policies can have on the natural environment. 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.	Emphasise the impacts of coastal processes and planning policies on the 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 infrastructure regime. Whilst the construction will be temporary, the buildings themselves will be permanent, of course	No change.
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.

Respondent	Comment	Partnership Response	Changes Made
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.
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	The SPD will provide a definition for temporary development and this could include site compounds etc (if relevant)	No change.

Respondent	Comment	Partnership Response	Changes Made
	temporary drainage strategy would need to be considered. The same LLFA guidance as for permanent developments would apply.		
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
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.

Respondent	Comment	Partnership Response	Changes Made
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 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.	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). The SPD will provide guidance relating to the implementation of coastal planning policies.	No change.

Respondent	Comment	Partnership Response	Changes Made
The British Horse Society (Charlotte Ditchburn)	The same guidance should be provided for temporary development as that for permanent development in the Coastal Change Management Area.	Comment noted.	No change.

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,	No change.

Respondent	Comment	Partnership Response	Make Changes
		<p>unless such proposals overlap with the terrestrial planning regime.</p> <p>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.</p>	
Tessa Aston	<p>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</p>	<p>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.</p>	No change.
Lindsay Frost	<p>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.</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>	No change.
Richard Starling	<p>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.</p>	<p>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.</p>	No change.
Norman Castleton	<p>Economically important, naturally important, special scientifically important</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>	No change.
Blue Sky Leisure (Paul Timewell)	<p>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</p>	<p>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</p>	No change.

Respondent	Comment	Partnership Response	Make Changes
	expected content and technical work needed to underpin them and any expectations/requirements for Council and public engagement.	would be a matter for the decision maker, and cannot be prescribed in the SPD.	
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. 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.	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.
Felixstowe Town Council (Ash Tadjrishi)	The local geology, and erosion history, should be required to be investigated, with appropriate evidence bases.	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.
J E Blanchflower	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.	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.
Lowestoft Cruising Club (David Bennett)	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'	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.
Andrew McDonald	No comment	N/A	N/A
Peter Terrington	Cost benefit analysis.	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.	No change.

Respondent	Comment	Partnership Response	Make Changes
SCEG - Scratby and California Environment Group (Lodge)	Time scale The demographics of the community Options for assessment of vulnerability	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.
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.

Respondent	Comment	Partnership Response	Make Changes
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 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.	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.

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 and women, located	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>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 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.</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>
Tessa Aston	<p>Is there an existing plan should the need to relocate residents or structures of national importance due to climate change/higher tides.</p>	<p>The management of different sections of the coastline is set out in the Shoreline Management Plans (SMPs).</p>	<p>No change.</p>

Respondent	Comment	Partnership Response	Changes Made
		The SPD will not alter the approach to the management of the coast as this is the role of SMPs.	
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 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 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 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	No change.
Norfolk County	a. The timescale guidance; b. Planning permission requirements; c. Funding streams that may be available to support. d. How roll back / relocation will be	Comment noted. The Partnership will consider whether to provide guidance relating to details of potential	Detail potential

Respondent	Comment	Partnership Response	Changes Made
Council - Lead Local Flood Authority (Sarah Luff)	considered in terms of planning consideration and whether there will be any variations from normal planning application submission?	funding streams available to rollback and relocation proposals.	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
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.

Respondent	Comment	Partnership Response	Changes Made
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 actions that should be taken by landowners or applicants if land is within or near to one of the Internal Drainage Boards and associated infrastructure.	Provide guidance relating to actions that should be taken by landowners or applicants if land is within or near to one of the Internal Drainage Boards and associated infrastructure.
Deben Estuary Partnership (Christine Block)	No Comment	N/A	N/A
Anglian Water Services Ltd	No Comment	N/A	N/A

Respondent	Comment	Partnership Response	Changes Made
(Stewart Patience)			
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 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.	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.
RSPB (Ian Robinson)	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	The Partnership will explore the opportunity to provide guidance relating to compensation. 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	Consider providing guidance relating to compensation and other financial assistance for coastal adaptation projects.

Respondent	Comment	Partnership Response	Changes Made
	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 be given to the time needed to 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,	No change.

Respondent	Comment	Partnership Response	Changes Made
		unless such proposals overlap with the terrestrial planning regime.	
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 is 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.

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

Respondent	Comment	Partnership Response	Changes Made
	<p>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, 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.</p>	<p>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>	
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

Respondent	Comment	Partnership Response	Changes Made
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 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	Comment noted – reference to this will be made in the SPD and some points may be appropriate for wider application in the SPD area	Make reference to the points on enabling development in the Deben Estuary Plan
Anglian Water Services Ltd (Stewart Patience)	No Comment	N/A	N/A

Respondent	Comment	Partnership Response	Changes Made
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 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.	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 are not normally enabling development themselves and will be considered elsewhere in the SPD	No change.
Bidwells (Kate Hammond)	Each application should be looked on its own merits/disadvantages and not specifically attached to a set of immovable guidelines.	Comment noted and agreed – flexibility and a case-by-case appraisal will always be necessary for any proposed enabling development scheme	No change.
RSPB (Ian Robinson)	Guidance on enabling development must be clear on the process that needs to be followed to assess the potential impacts. With respect to the environment, the RSPB expects that potential impacts will be captured through a comprehensive Strategic Environmental Assessment and Habitats Regulations Assessment. These will assess options and identify predicted impacts for which there is a very clear process for mitigation and/or derogation and compensation where appropriate. Such a project will need to ensure that the Competent Authority that the overall coherence of the Natura 2000 network will be maintained.	The process for enabling development will be the same for an ordinary planning application. Applications must be submitted with the appropriate evidence and assessments where necessary, which may include Strategic Environmental Assessments and/or Habitats Regulations Assessments.	No change.
The British Horse Society (Charlotte Ditchburn)	Developers should be provided with a copy of 'GG 142 Walking, cycling and horse-riding assessment and review' to ensure any infrastructure relating to development considers all Non-Motorised Users equally. Developers	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
	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.		

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.

Respondent	Comment	Partnership Response	Changes Made
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 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.	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.
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.

Respondent	Comment	Partnership Response	Changes Made
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
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

Respondent	Comment	Partnership Response	Changes Made
RSPB (Ian Robinson)	The RSPB has developed a range of expertise in managing coastal change projects and consider that the lessons learnt 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.	Comment noted. The Partnership will explore the potential for including the mentioned case study/ies.	Consider this/these case study/ies for inclusion.

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	No change.

Respondent	Comment	Partnership Response	Changes Made
		Partnership Authorities will prepare and consult on the draft SPD.	
Paul Johnson	<p>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.</p>	<p>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</p>	<p>Technical language has been used sparingly throughout the draft SPD, and a glossary has been provided to help explain technical terms.</p>

Respondent	Comment	Partnership Response	Changes Made
		more 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	No change.

Respondent	Comment	Partnership Response	Changes Made
		consultation, as with other recent consultations.	
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.
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'	No change.

Respondent	Comment	Partnership Response	Changes Made
		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.	
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	Set out the roles and responsibilities of key organisations along the coast.

Respondent	Comment	Partnership Response	Changes Made
		the environment along the coast. The draft SPD will set out the roles and responsibilities of some of the key organisations on 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 building distances between planned structures and the sea wall here in Lowestoft. Only for the local authority at the time to overrule what has been published. What are the chances of one area seeing the benefit and there to be realistic control. 4. It is apparent that the Port Authority here has more clout than many appreciate. By closing of roads that have been used by the public for many years. Or even the South Pier. So will the power of Felixstowe lead to unbalanced approach	When adopted, the SPD will be a material consideration and carry weight in the determination of planning applications.	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>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>The Partnership preparing the SPD includes East Suffolk Council, Great Yarmouth Borough Council, The Broads Authority, North Norfolk District Council, and the Coastal Partnership East Team. The Partnership is therefore operated by officers from each Local Planning Authority and funded by the authorities involved.</p>	
Lindsay Frost	<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</p>	<p>No change.</p>

Respondent	Comment	Partnership Response	Changes Made
		Environment Agency advice on sea-level rise rates etc that these factors are taken into account.	
Michael Castle	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 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.	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.	No change.
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	No change.

Respondent	Comment	Partnership Response	Changes Made
		<p>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>Great Yarmouth Borough Council (Environmental Services) (David Addy)</p>	<p>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.</p>	<p>Support noted.</p>	<p>No change.</p>

Respondent	Comment	Partnership Response	Changes Made
Robert Wynn and Sons (Tim West)	<p>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 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>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</p>	No change.

Respondent	Comment	Partnership Response	Changes Made
		2008. In such circumstances, the draft SPD would not be relevant.	
Martlesham Sea Wall Group (Thomas O'Brien)	<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 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>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</p>	No change.

Respondent	Comment	Partnership Response	Changes Made
		coastal planning policies.	
Michael Powles	<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 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 vulnerable and sensitive areas and critical natural sea defences.</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>	No change.

Respondent	Comment	Partnership Response	Changes Made
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 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. 2. COASTAL ADAPTATION SUPPLEMENTARY PLANNING DOCUMENT INITIAL CONSULTATION a. Are there any elements of National or Local Planning Policy which should be particularly emphasised/explained in the SPD? Yes 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</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</p>	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>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/ c. Are the categories identified in section 3 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 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</p>	<p>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>	

Respondent	Comment	Partnership Response	Changes Made
	<p>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 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>		
Norman Castleton	The routes to obtaining the necessary finance.	The draft SPD provides some guidance relating to funding development and/or coastal management	Identify potential funding mechanisms for the implementation of coastal

Respondent	Comment	Partnership Response	Changes Made
		measures. However, the purpose of the SPD is not to provide financial assistance but to aide the implementation of coastal adaptation planning policies.	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.

Respondent	Comment	Partnership Response	Changes Made
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 North Norfolk District Council	Support and comment noted. The rollback development mentioned forms part of the case	No change.

Respondent	Comment	Partnership Response	Changes Made
	<p>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 over coming issues in the future. Please do contact me in the first instance should this be of interest.</p>	<p>studies appended to the draft SPD.</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>

Respondent	Comment	Partnership Response	Changes Made
Norfolk Coast Partnership (Gemma Clark)	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.	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.	No change.
Norfolk County Council - Lead Local Flood Authority (Sarah Luff)	Please ensure reference to the LLFA Guidance document and its contents is included. This document and the principles 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.	The draft SPD provides guidance on the implementation of coastal adaptation planning policies. However, the draft SPD also sets out the roles of responsibilities of organisations operating and managing on the coast.	No change.

Respondent	Comment	Partnership Response	Changes Made
Felixstowe Town Council (Ash Tadjrishi)	<p>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 on 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 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 closed 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>	<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. 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</p>	No change.

Respondent	Comment	Partnership Response	Changes Made
		<p>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>	
<p>J E Blanchflower</p>	<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</p>	<p>No change.</p>

Respondent	Comment	Partnership Response	Changes Made
		<p>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>	
<p>Lowestoft Cruising Club (David Bennett)</p>	<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</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</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>Lake Lothing. It is issues like these that need to be covered by the Coastal Adaption SPD. While they are specific issues, and the Coastal Adaption SPD is covering a large extent of coastline, local issues need to fully considered.</p>	<p>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>	
<p>Marine Management Organisation (Stacey Clarke)</p>	<p>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.</p>	<p>Marine and terrestrial planning are inherently linked, and consideration has been given to the relationship between the development plans for the SPD area, the</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
		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.	
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 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	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	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>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>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.</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</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
		<p>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</p>	

Respondent	Comment	Partnership Response	Changes Made
		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.	
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	No change

Respondent	Comment	Partnership Response	Changes Made
		are not just reactionary.	
Andrew McDonald	<p>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, 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>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</p>	No change

Respondent	Comment	Partnership Response	Changes Made
		<p>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>	
<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</p>	<p>The Partnership notes the comments and recognises the challenges that many coastal golf courses face in</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>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 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 adaptation 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>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>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 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: • 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</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</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</p>

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

Respondent	Comment	Partnership Response	Changes 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.		
Environment Agency (Martin Barrell)	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 further if required. We would welcome the opportunity to further review the SPD as the document is developed.	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.	No change
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	Comment noted.	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>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.</p>		
<p>Peter Terrington</p>	<p>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 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>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 Marine Plan and Shoreline</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
		Management Plan, as opposed to the development plan and this draft SPD.	
SCEG - Scratby and California Environment Group (Lodge)	Adaption. As much detail to assure public that adaption is explained and as much guidance given as possible.	Relevant detail on adaptation (including links to other guidance) is provided in the draft SPD.	No change
Southwold Town Council (Lesley Beevor)	Main issues are what development is permitted and relocation in case of loss of property due to erosion. Southwold shoreline (Walberswick to Easton Bavents) is shown in Appendix A as having little change to 2055. However the cliff at the end of the northern seawall at Easton Bavents may be breached on a shorter time than that (10-30 years). This opens up quite a large number of properties (~100) in North Southwold and South Reydon to risk from tidal surges. The current CMP policy is to allow a shingle bar to develop, backed up by defence along border of marsh. Given the scale of the problem, and the number of properties potentially affected, the issue perhaps need to be spelt out.	Matters relating to coastal management are for the SMPs to consider, alongside Local Plans, but the SPD cannot directly impact these issues.	No change
Suffolk County Council (AONB Team) (Beverley McClean)	Thank you for consulting the Suffolk Coast & Heaths AONB team on the Draft Coastal Adaptation SPD consultation. The AONB team have the following comments to make on the consultation which we hope can be incorporated into the final SPD. 1 Purpose of the SPD In addition to the objectives identified, the objectives of Coastal Adaptation SPD should also include the following objectives: • Provide guidance for temporary uses of land and buildings. • Set out the approach to relocation of residential properties. • Set out the approach to ‘roll back’ for commercial uses and essential infrastructure 2. Coastal Change The AONB teams supports the cross boundary integrated approach being proposed for the preparation of the Coastal Adaptation SPD. We would ask that the Coastal Change Chapter includes information on climate change impacts in estuaries and not just the open coast. Estuaries are an integral part of the coastal landscape of the Suffolk Coast & Heaths AONB. These too are dynamic and being impacted as a result of climate change and for this reason they should be included in the SPD. 3. Links to Shoreline Management Plans In addition to linking to SMPS 5, 6, 7 & 8, the SPD should also	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	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>reference the need for any 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 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</p>	<p>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>	

Respondent	Comment	Partnership Response	Changes Made
	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.		
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 time. However, we request to be kept updated and engaged in the later developments of this document.	Comment noted.	No change
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	No change

Respondent	Comment	Partnership Response	Changes Made
		planning applications.	
Deben Estuary Partnership (Christine Block)	No Comment	N/A	No change
Kathryn Newnham	<p>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 considerably. So whilst erosion is natural mankind has increased this process dramatically. Sea levels have risen and human activity around out 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 id 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</p>	<p>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.</p> <p>Questions about overall housing numbers and particular planning applications are matters beyond the scope of the SPD, as is offshore</p>	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>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 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 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</p>	<p>dredging. However, the SPD will provide guidance to help manage development and rollback/relocation in coastal areas.</p>	

Respondent	Comment	Partnership Response	Changes Made
	<p>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. 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.</p>		
Richard Adams	<p>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?</p>	<p>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.</p>	<p>No change</p>
Anglian Water Services Ltd (Stewart Patience)	<p>No Comment</p>	<p>N/A</p>	<p>No change</p>
Barton Willmore (Will Spencer)	<p>No Comment</p>	<p>N/A</p>	<p>No change</p>
Bidwells (Kate Hammond)	<p>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</p>	<p>The management approach to the coast (e.g. protect/hold the</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
	businesses in coastal areas. If you would like to discuss any of these points further please do not hesitate to contact us.	<p>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>	
Bourne Leisure Ltd (Lichfields)	<p>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 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</p>	<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</p>	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>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 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. 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 CCMA’s. 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 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</p>	<p>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> <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</p>	

Respondent	Comment	Partnership Response	Changes Made
	<p>less risk from coastal erosion either within or outside CCMA's 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 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>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>	
Michael Boon	<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</p>	<p>Shoreline Management Plans make the decisions on the management of the coast and cover wide areas (based largely on</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>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 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 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. 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 adjacent to them. I comment further on some examples in an appendix to my response. 4 Proposed Content of the SPD 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</p>	<p>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>	

Respondent	Comment	Partnership Response	Changes Made
	<p>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 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 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</p>		

Respondent	Comment	Partnership Response	Changes Made
	<p>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 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 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</p>		

Respondent	Comment	Partnership Response	Changes Made
	<p>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 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</p>		

Respondent	Comment	Partnership Response	Changes Made
	<p>River Yare in Southtown at Great 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 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>		
Norfolk Constabulary	I have asked NPS Group to send a reply for and on behalf of both Norfolk Constabulary and Suffolk Constabulary.	Comment noted.	No change
RSPB (Ian Robinson)	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,	The draft SPD recognises the importance of	No change

Respondent	Comment	Partnership Response	Changes Made
	<p>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>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>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 as adaptation for local communities. Opportunities should be sought to explore habitat enhancement and creation through</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</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
	<p>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>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>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; - 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; 	<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</p>	<p>No change</p>

Respondent	Comment	Partnership Response	Changes Made
	<ul style="list-style-type: none"> - 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>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</p>	

Respondent	Comment	Partnership Response	Changes Made
		<p>set out in the draft SPD.</p> <p>The draft SPD also contains guidance relating to the implementation of rollback and relocation policies, and is supported by a number of coastal adaptation best practice case studies.</p>	
Holkham Estate (Peter Mitchell)	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.	Whilst the SPD cannot alter SMP policy, developing workable guidance on enabling development forms part of the draft SPD.	No change