

Planning Committee

Agenda 11 November 2022

10.00am

Yare House, 62-64 Thorpe Road, Norwich NR1 1RY

John Packman, Chief Executive – Friday 04 November 2022

Under the Openness of Local Government Bodies Regulations (2014), filming, photographing and making an audio recording of public meetings is permitted. These activities however, must not disrupt the meeting. Further details can be found on the [Filming, photography and recording of public meetings](#) page.

Introduction

1. To receive apologies for absence
2. To receive declarations of interest
3. **To receive and confirm the minutes of the Planning Committee meeting held on 14 October 2022** (Pages 3-12)
4. To note whether any items have been proposed as matters of urgent business

Matters for decision

5. Chairman's announcements and introduction to public speaking
Please note that public speaking is in operation in accordance with the Authority's [Code of Practice for members of the Planning Committee and officers](#).
6. Request to defer applications include in this agenda and/or vary the order of the agenda
7. **To consider applications for planning permission including matters for consideration of enforcement of planning control:**
 - 7.1. BA/2022/0312/ADV - 3 signs at Hickling Broad (Pages 13-18)
 - 7.2. Enforcement - Land at North End, Thorpe next Haddiscoe (Pages 19-22)

Enforcement

8. **Enforcement update** (Pages 23-29)
Report by Head of Planning

Policy

9. **Coastal Adaptation SPD consultation** (Pages 30-115)
Report by Planning Policy Officer
10. **East Suffolk Council walking and cycling strategy** (Pages 116-117)
Report by Planning Policy Officer
11. **Consultation responses** (Pages 118-123)
Report by Planning Policy Officer

Matters for information

12. **Circular 28/83 Publication by Local Authorities of information about the handling of planning applications Q3 (1 July to 30 September 2022)** (Pages 124-130)
Report by Planning Technical Support Officer
13. **Appeals to the Secretary of State update** (Pages 131-136)
Report by Senior Planning Officer
14. **Decisions made by Officers under delegated powers** (Pages 137-140)
Report by Senior Planning Officer
15. **To note the date of the next meeting – Friday 09 December 2022 at 10.00am at Yare House, 62-64 Thorpe Road, Norwich**

Planning Committee

Minutes of the meeting held on 14 October 2022

Contents

| | |
|---|----|
| 1. Apologies and welcome | 2 |
| Openness of Local Government Bodies Regulations 2014 | 2 |
| 2. Declarations of interest and introductions | 2 |
| 3. Minutes of last meeting | 2 |
| 4. Matters of urgent business | 2 |
| 5. Chair's announcements and introduction to public speaking | 3 |
| 6. Requests to defer applications and/or vary agenda order | 3 |
| 7. Applications for planning permission | 3 |
| (1) BA/2022/0258/FUL and BA/2022/0259/LBC. No's 1, 2 & 3 Barn Mead Cottages, Coltishall | 3 |
| (2) BA/2022/0239/HOUSEH - Freshfields, Priory Road, St Olaves | 6 |
| 8. Enforcement update | 7 |
| 9. Oulton Neighbourhood Plan – proceeding to referendum | 8 |
| 10. Updated National Flood Risk Guidance and our Flood Risk Supplementary Planning Document | 8 |
| 11. Consultation responses | 8 |
| 12. Appeals to the Secretary of State | 9 |
| 13. Decisions made by officers under delegated powers | 9 |
| 14. Date of next meeting | 9 |
| Appendix 1 – Declaration of interests Planning Committee, 14 October 2022 | 10 |

Present

Harry Blathwayt – in the Chair, Stephen Bolt, Nigel Brennan, Bill Dickson, Andrée Gee, Tony Grayling, Gail Harris, Tim Jickells, James Knight, Vic Thomson, Melanie Vigo di Gallidoro and Fran Whymark

In attendance

Natalie Beal – Planning Policy Officer, Jason Brewster – Governance Officer, Cheryl Peel – Senior Planning Officer, Callum Sculfor – Planning Assistant, Cally Smith – Head of Planning and Sara Utting – Senior Governance Officer

Stuart French, Local Highway Authority (Norfolk County Council), attended for item 7(1).

Members of the public in attendance who spoke

Eliza Heaffey representing the Norfolk Mead Hotel and Alistair Paterson (objector) both for item 7(1) – application BA/2022/0258/FUL No's 1, 2 & 3 Barn Mead Cottages, Coltishall.

1. Apologies and welcome

The Chair welcomed everyone to the meeting.

An apology was received from Leslie Mogford.

Openness of Local Government Bodies Regulations 2014

The Chair explained that the meeting was being audio-recorded. All recordings remained the copyright of the Broads Authority and anyone wishing to receive a copy of the recording should contact the Governance Team. The minutes remained the record of the meeting. He added that the law permitted any person to film, record, photograph or use social media in order to report on the proceedings of public meetings of the Authority. This did not extend to live verbal commentary. The Chair needed to be informed if anyone intended to photograph, record or film so that any person under the age of 18 or members of the public not wishing to be filmed or photographed could be accommodated.

2. Declarations of interest and introductions

Members provided their declarations of interest as set out in Appendix 1 to these minutes and in addition to those already registered. All members declared that they had been lobbied by the objectors with regard to the planning application BA/2022/0258/FUL.

3. Minutes of last meeting

The minutes of the meeting held on 21 September 2022 were approved as a correct record and signed by the Chair.

4. Matters of urgent business

There were no items of urgent business

5. Chair's announcements and introduction to public speaking

Public Speaking: The Chair stated that public speaking was in operation in accordance with the Authority's Code of Practice for members of the Planning Committee and officers.

6. Requests to defer applications and/or vary agenda order

No requests to defer or vary the order of the agenda had been received.

7. Applications for planning permission

The Committee considered the following applications submitted under the Town and Country Planning Act 1990 (also having regard to Human Rights), and reached the decisions set out below. Acting under its delegated powers, the Committee authorised the immediate implementation of the decisions.

The following minutes relate to additional matters of information or detailed matters of policy not already covered in the officer's report, which were given additional attention.

(1) BA/2022/0258/FUL and BA/2022/0259/LBC. No's 1, 2 & 3 Barn Mead Cottages, Coltishall

Alterations & extensions to 1, 2 & 3 Barn Mead Cottages to create a new Spa Treatment Centre.

Applicant: Mr James Holiday

The Senior Planning Officer (SPO) provided a detailed presentation of the application for the change of use of terrace of cottages known as 1, 2 & 3 Barn Mead and their extension to expand the existing spa facilities at the hotel. The SPO provided various maps showing the location of the site within Coltishall, within the surrounding area and within the boundary of the Norfolk Mead Hotel. The SPO provided photographs detailing the access from Church Street onto Church Loke, the various car parks associated with the Hotel, and the buildings and garden associated with the application. The SPO's presentation also provided floorplans of the terrace of cottages and garden showing their current configuration and proposed layout, and elevation drawings of the proposed development. The presentation also included an image of the access to Church Loke from Church Street showing the proposed widening of the eastern side of the access as part of the recommended conditions of the Local Highway Authority (LHA).

In assessing the application, the SPO addressed the key issues of: the principle of development, the design of the new buildings and the impacts on the Conservation Area, neighbour amenity and highways.

The SPO explained that this was an existing tourism and recreation destination that had existing spa facilities within the main house but proposed to move them to a dedicated facility immediately adjacent to the main building. The design of the proposals was considered to be acceptable and it was not considered that the proposal would result in an adverse impact on highway safety or neighbour amenity given the current levels of usage. Therefore, it was

recommended that planning permission and Listed Building Consent be approved subject to conditions.

In response to a member's question the SPO confirmed that the existing garden would be replaced by single storey structures to accommodate the spa room and conservatory restaurant and sauna/jacuzzi leaving an abbreviated outdoor patio area.

Mr Paterson, an objector representing himself and Richard Howlett, both residents of Church Loke, provided a statement, questioning whether due diligence had adequately been performed on the highway, parking and waste management aspects of the application. Mr Paterson believed the traffic data supplied by the applicant was not correct and this had implications for the safety of pedestrians and drivers at the junction of Church Loke and Church Street. Mr Paterson questioned the viability of the predicted 70% utilisation of the new facility by hotel residents; wouldn't the applicant be forced to increase day visitor numbers to ensure a return on their investment thereby exceeding agreed/permitted visitor traffic. Mr Paterson urged members of the Planning Committee, if they agreed that traffic would increase, to refuse this application. If they could not refuse this application then, Mr Paterson requested, could members defer their decision and ask officers of the Local Planning Authority to request a full traffic impact assessment, to include a survey of current visitor numbers and an assessment of likely visitor numbers to provide the LHA with accurate data with which to assess the safety of the Church Street/Church Loke junction. Mr Paterson then questioned whether the parking available to the applicant was sufficient for this new usage, he believed, based on Norfolk County Council guidelines, that this new usage would require an additional 25 parking spaces. The nature of this new usage would, according to Mr Paterson, generate an increase in chemical waste associated with the beer spa, mud baths, swimming pool and jacuzzi, not to mention the additional waste from the new toilet and restaurant facilities. Mr Paterson highlighted that the applicant would create a new connection to the main sewer, via Church Loke, however unlike the waste water from the Hotel this waste would not be conditioned, what steps would be taken to ensure that this new waste did not add to the pollution of the River Bure?

Eliza Heaffey, Spa Manager at the Norfolk Mead Hotel, on behalf of the applicant, provided a statement in support of the application, detailing the recent history of this business and highlighting its role in the local community as an employer, a supporter of local businesses and as a popular, award winning destination. Ms Heaffey stressed the importance of this development in terms of its benefit to local building businesses and trades people, the extra local employment provided by these new facilities and the increased business for local suppliers. The environment was important to the business and Ms Heaffey demonstrated this by highlighting the use of local suppliers, recycling, minimising food waste, the adoption of new technology to reduce paper usage, the use of chemical free products in the hotel, maintenance of the grounds to allow wildlife to prosper and the provision of electric car charging points. Ms Heaffey explained that a new water and drainage system would be installed and this would employ the most environmentally friendly method of waste disposal. The spa would be a place of tranquillity and Ms Heaffey added that it would not be in the interest of the business to sacrifice this.

Members were keen to better understand the impact of this development on traffic to/from the venue. Ms Heaffey confirmed that there would be two extra treatment rooms bringing the total to four and that the expected increase in traffic would only relate to these additional rooms. Ms Heaffey explained that the majority of usage would be by residents of the hotel and the remainder would be to pre-booked day visitors attending on a half or full day basis and hence the minimal uplift in traffic. Ms Heaffey confirmed that the spa would operate from 8am to 8pm and as such would not impinge on the arrival of extra guests for an evening wedding event.

A member wanted to better understand the water treatment for this new development. Ms Heaffey explained that this development would not be utilising the existing onsite water treatment facility and waste water would be pumped into the main sewer on Church Street and there would be no discharge into the River Bure.

Members were supportive of this application and commended the business for their high standards, the opportunities provided for local employment and success as a visitor attraction and welcomed their investment given the economic uncertainty. Members sympathised with the possible amenity effects to neighbours but felt that it was not in the interest of the applicant to sacrifice the peace and quiet.

Members acknowledged the narrow access track to the venue and the difficulty of entering/leaving Church Street. A member was concerned that cars would need to reverse onto the main road to enable traffic to exit the venue. Stuart French, representing the LHA, confirmed that the condition to widen the splay to 4.3m (and keep a drop kerb) would ensure that two vehicles could be accommodated side by side at the head of Church Loke thus eliminating the need for a vehicle to reverse onto Church Street. Mr French also stressed the tidal nature of the traffic associated with the venue would minimise the likelihood of this occurrence/situation. Members acknowledged that the extra traffic associated was small in comparison to that associated with a wedding and some visitors and/or staff would walk or cycle to the venue. Members welcomed the LHA's condition and the resulting improvement to road safety.

A member questioned whether the existing parking provision would be adequate although accepted that it was not in the interest of the applicant to not accommodate visitors' cars.

Bill Dickson proposed, seconded by James Knight and

It was resolved unanimously to approve the application subject to the following conditions:

- Time Limit.
- In accordance with submitted plans and documents.
- Highways conditions regarding off site improvement works.
- Material details required prior to their installation including flint work, mortar mix, brick bond and brick type, cladding details, coping details, truss modification details and window colour.

- Prior to their installation details of the sauna and jacuzzi structure shall be submitted and agreed.
- Landscaping plan to show new planting.
- Hours of opening for the spa only.
- No external lighting.
- Spa use in association with the hotel only and not as an independent business.
- Removal of Permitted Development rights for the spa facility

Tim Jickells proposed, seconded by Stephen Bolt and

It was resolved unanimously to approve the Listed Building Consent subject to the following conditions:

- Time Limit
- In accordance with submitted plans and documents.
- Material details required prior to their installation including flint work, mortar mix, brick bond and brick type, cladding details, coping details, truss modification details and window colour

The Chair thanked those attending for their contributions.

The Committee adjourned at 11:03am and reconvened at 11:06am.

(2) BA/2022/0239/HOUSEH - Freshfields, Priory Road, St Olaves

Conversion of garage into additional living space, alterations to rear sun room including upgrading of roof, new windows and doors, new windows arrangement to rear elevation and new double garage to front driveway.

Applicant: Mr Greg Munford

The Planning Assistant (PA) explained that this application was before the Planning Committee as the applicant was a member of the Broads Authority. The PA provided a detailed presentation of the application for the conversion of an integrated garage into additional living space, to modernise the rear elevation by changing the existing glass roof with a built tiled roof and a new detached double garage to front driveway. The PA provided various maps showing the location of the site within St Olaves, within the immediate residential area and the site boundary. The PA included images of the property showing the front driveway, the front and rear elevations of the property and highlighting the height of the trees that were integral to the hedge to the front of the property along its northern boundary. The PA provided detailed drawings of the front and rear elevations of the property and ground and first floorplans showing the changes associated with this application.

In assessing the application, the PA addressed the key issues of: the principle of development, the design of the proposed development and the impacts on neighbouring amenity.

The PA explained that the modernisation and updating of the rear of the property and the erection of a garage were acceptable changes. The PA confirmed that in terms of design (Local Plan Policy DM43) the replacement of the sun room would use matching materials to the existing dwelling which were sympathetic to the area. The PA confirmed that the reorganised first floor windows would have a minimal impact and would not be detrimental to the overall design of the building and the same was true for the new windows to the front of the property that would replace the existing garage doors. The PA explained that the development would not increase overlooking or additional overshadowing and would not be detrimental to neighbouring amenity (Policy DM21).

The Chair thanked the PA for a clear and concise presentation.

Gail Harris proposed, seconded by Melanie Vigo di Gallidoro and

It was resolved unanimously to approve the application subject to the following conditions:

- Three-year timeframe for commencement
- In accordance with the approved plans and material details

8. Enforcement update

Members received an update report from the Head of Planning (HoP) on enforcement matters previously referred to the Committee. Further updates were provided at the meeting for:

Land at the Beauchamp Arms (Unauthorised static caravans): prosecution was still in preparation; latest, and most likely final, drafts of witness statements had been sent to the solicitor.

Blackgate Farm, High Mill Road, Cobholm: The HoP confirmed that reference to 3 October 2023 in this report item was incorrect, the correct year was 2022.

The HoP, whose last communication with the Landowner (LO) at a recent site visit had indicated that they were not intending to comply with the Enforcement Notice, had now received a letter from the LO's solicitor offering to remove the caravans and requesting more time to do so. The HoP stated that the offer was to remove three of the caravans by the end of October 2022 and the remainder by April 2023. Given that the matter had been ongoing for some years and the short initial deadline, the HoP recommended that the Local Planning Authority (LPA) for the Broads accept the offer, with the caveat that if the initial deadline is not met then the LPA would withdraw acceptance and pursue resolution in a manner deemed most expedient. If the LPA was to proceed towards prosecution the HoP believed that this matter would not reach court until March 2023 at the earliest, and if the later deadline was not met the HoP indicated that at least half the caravans would have been removed.

Members were keen to avoid any further delay on this matter and keep the pressure on the Landowner to comply and it was proposed to specify the beginning of April 2023 as the final deadline.

Tim Jickells proposed, seconded by Stephen Bolt and

It was resolved unanimously that the LPA for the Broads accept the offer by the Landowner to remove 3 caravans by the end of October 2022 and the remaining caravans by 1 April 2023, subject to the strict caveat that unless the initial removal is completed as offered by the end of October, the LPA will withdraw acceptance and take the most expedient approach to resolution.

Land to east of North End, Thorpe next Haddiscoe: Following legal advice the HoP would produce a full report for a future Planning Committee.

9. Oulton Neighbourhood Plan – proceeding to referendum

The Planning Policy Officer introduced the report, which sought approval for the Oulton Neighbourhood Plan proceeding to referendum. The Plan had been subject to an independent examination and endorsed, with some changes, for referendum.

Tony Grayling proposed, seconded by Fran Whymark and

It was resolved unanimously to support the Examiner's report and support the Oulton Neighbourhood Plan proceeding to referendum.

10. Updated National Flood Risk Guidance and our Flood Risk Supplementary Planning Document

The Planning Policy Officer introduced the report that had been produced in response to an update to the Flood Risk section of the National Planning Policy Guidance (NPPG). The introduction of an addendum was a pragmatic response to these changes and highlighted whether content in the Flood Risk Supplementary Planning Document (SPD) had been superseded (or not) by the updated NPPG content.

Andrée Gee proposed, seconded by Vic Thomson and

It was resolved unanimously to endorse the addendum to the Flood Risk SPD.

11. Consultation responses

The Planning Policy Officer (PPO) introduced the report, which documented the responses to the Hemsby Neighbourhood Plan. The PPO indicated that the majority of responses sought clarification.

Tim Jickells proposed, seconded by Stephen Bolt and

It was resolved unanimously to endorse the nature of the proposed response.

12. Appeals to the Secretary of State

The Committee received a schedule of appeals to the Secretary of State since the last meeting.

13. Decisions made by officers under delegated powers

The Committee received a schedule of decisions made by officers under delegated powers from 5 September to 4 October 2022 and any Tree Preservation Orders confirmed within this period.

14. Date of next meeting

The next meeting of the Planning Committee would be on Friday 11 November 2022 10.00am at Yare House, 62-64 Thorpe Road, Norwich.

The meeting ended at 11:40am.

Signed by

Chair

Appendix 1 – Declaration of interests Planning Committee, 14 October 2022

| Member | Agenda/minute | Nature of interest |
|--|---------------|---|
| Harry Blathwayt on behalf of all members | 7.1 | Lobbied: Receipt of letters and emails from objectors |
| Harry Blathwayt on behalf of all members | 7.2 | Applicant is a member of the Broads Authority |
| Andrée Gee | 9 | East Suffolk Councillor - other registerable interest |

Planning Committee

11 November 2022

Agenda item number 7.1

BA 2022 0312 ADV- 3 signs at Hickling Broad

Report by Planning Assistant

Proposal

Installation of information billboards at three sites around Hickling Broad

Applicant

Broads Authority

Recommendation

Approve subject to conditions

Reason for referral to committee

The Broads Authority is the applicant

Application target date

17.11.2022

Contents

| | | |
|----|---|---|
| 1. | Description of site and proposals | 2 |
| 2. | Site history | 2 |
| 3. | Consultations received | 2 |
| 4. | Representations | 3 |
| 5. | Policies | 3 |
| 6. | Assessment | 3 |
| 7. | Conclusion | 4 |
| 8. | Recommendation | 5 |
| 9. | Reason for recommendation | 5 |
| | Appendix 1 – Location map | 6 |

1. Description of site and proposals

- 1.1. Hickling Broad is located in the northern part of the Broads, 20 miles north east of Norwich and is important in terms of landscape, nature conservation and recreation interest. Hickling Broad itself falls within the very large Upper Thurne, Broads and Marshes SSSI, which encompasses an extensive area of some 1159 ha. Hickling Broad also forms part of the Broads Special Area of Conservation (SAC) and Broadland Special Protection Area (SPA), which are European sites. It is also listed as The Broadland Ramsar site.
- 1.2. This application is proposing the installation of three signs at three different locations around Hickling Broad. The signs will be 750mm by 400mm with a height of 1.3m and be constructed of HPL (High Pressure Laminate) boards with steel fixings and oak posts. The purpose of the signs is to provide information and education to the public with regards to the restoration works that the Broads Authority are doing to maintain Hickling Broad. One of the signs is proposed along a footpath that is maintained by the Norfolk Wildlife Trust, another is at Catfield Staithe, where it overlooks the moorings, and the third location is the beach which is located at the water's edge next to Hickling Windsurfing Club.

2. Site history

- 2.1. BA/2014/0411/FUL - Install erosion protection along 3 bayed areas at NE end of Hickling Broad.

BA/2018/0173/FUL - Hickling Broad enhancement work to reconstruct the reedbed footprint to that of circa 1946. To be achieved through the installation of geotextile tubes that are filled with dredged sediment, pinned in place by wooden poles and covered with polyfelt curtain, additional sediment and planted, and then once established, the void created to be filled with further dredged sediment to re-create an area of reedbed.

BA/2018/0393/APPCON - Details of: Condition 3: water monitoring plan of permission A/2018/0173/FUL.

BA/2021/0258/NONMAT - Change to timings of proposed works, non-material amendment to permission BA/2018/0173/FUL

3. Consultations received

BA Landscape

- 3.1. The proposed information boards are of relatively small size and are unlikely to have any significant landscape or visual effects. They would have a worthwhile function given the information to be conveyed. From the photo provided, the polycarbonate material together with the hard edges may have a slightly unsympathetic appearance. If feasible, I suggest that a timber frame surround could soften this. The mounting of each board is

rather unclear. It would be helpful if further details could be provided. Fixing to existing structures or new timber posts would be preferable. No objection.

BA Heritage Planning Officer

- 3.2. Thank you for consulting me on the above planning application. Given the benefits of providing interpretation to locals and visitors regarding an important restoration project I can advise I have no objection to the erection of the signs at the locations proposed which are of a small scale and simple in form. Just for clarity, where the signs are not being installed onto an existing structure (such as a fence) the applicant will need to provide a simple drawing which shows what the signs will be erected onto and the material of the proposed frame/stand and how it will be fixed to the ground, (I assume a timber post for example)? I would also recommend the imposition of a condition which secures the removal of the signs and associated structures and making good of the land when they are no longer required to help protect the landscape.

4. Representations

- 4.1. Broads Society – Supports the application

5. Policies

- 5.1. The adopted development plan policies for the area are set out in the [Local Plan for the Broads](#) (adopted 2019).
- 5.2. The following policies were used in the determination of the application:
- DM11 – Heritage Assets
 - DM16 – Development and Landscape
 - DM43 – Design
 - DM49 – Advertisements and signs

6. Assessment

- 6.1. The proposal is for the erection of three information signs to inform the public of works that the Broads Authority has been carrying out. The signs will be located at three different sites around Hickling Broad. The main issues in the determination of this application are the principle of development, appearance of the proposed signs and the impact on the landscape.
- 6.2. The three proposed signs are to provide the public with information in terms of a restoration project. These are non-illuminated signs located at well-established sites, sited off the public highway, and which relate directly to the Broad sited immediately behind the sign locations. The principle of development is therefore considered acceptable.

- 6.3. Considering the issue of design, it is important to note that advertisements and signs should be sensitively designed and located, having regard to the general characteristics of the locality. The signs proposed are small, simple and use sustainable materials. There will be no illumination and the signs will not be large or out of place. The proposal is acceptable in terms of Policy DM49 of the Local Plan for the Broads.
- 6.4. In assessing the design of the proposed development, Policy DM43 states that all development will be expected to be of a high design quality and should integrate effectively with its surroundings, reinforce local distinctiveness and landscape character and preserve or enhance cultural heritage. The proposed signs are made from HPL (High Pressure Laminate) eco board and will be 10mm thick with rounded corners. This is a sustainable material and will be durable to the elements as well as being long lasting. The sign will use a stainless-steel bracket to the underside to attach it to the sanded oak post which will be set into the ground with concrete. The boards themselves measure 750mm by 400mm and will be approx. 1.3m in height. The signs are simple in form and small scale and will not detract from the special qualities of the particular areas. The proposal is in accordance with the requires of Policy DM43 of the Local Plan for the Broads.
- 6.5. With regards to the landscape impact, the three chosen sites are key vantage points of Hickling Broad and areas which members of the public pass frequently. One of the sites is located within the Norfolk Wildlife Trust managed area and is located at the far east side of the Broad. There are other signs in this particular area, one of which is a Broads Authority sign relating to a different on-going project and another sign installed by the Norfolk Wildlife Trust informing the public of particular species in the area. Both of these signs are similar in size, although attached to the fence rather than a standalone post. The other two sites are moorings which are frequently used and the signs are positioned in places where they will be seen, but not obtrusive. The Landscape Officer was consulted and confirmed that there was no objection and that they will have a worthwhile function. It is considered acceptable in terms of Policy DM16 of the Local Plan for the Broads.
- 6.6. Hickling Broad is the largest broad and is important in terms of landscape and nature conservation. The proposed signs will maintain the high standard of materials expected and it is considered that the impact on the surrounding area will be minimal. The proposed signs will not have a negative impact on the area, therefore is in accordance with the requirements of Policy DM11 of the Local Plan for the Broads.

7. Conclusion

- 7.1. The application is for the erection of three signs located at three different sites around Hickling Broad. These sites are the National Wildlife Trust footpath, the beach located next to Hickling Wind Surfing Club and Catfield Staithe moorings. The signs are simple in form and are considered acceptable in terms of Policy DM11, DM16, DM43, DM49 of the Local Plan for the Broads.

8. Recommendation

8.1. Approve subject to conditions:

1. Three-year timescale for commencement
2. In accordance with the approved plans and material details
3. The signs must be removed after they have served the intended purpose to protect the landscape and make good of the land.

9. Reason for recommendation

- 9.1. The proposed signs at Hickling Broad are in accordance with the NPPF guidance and Policy DM11, DM16, DM43, DM49 of the Local Plan for the Broads and is considered acceptable.

Author: Callum Sculfor

Date of report: 24 October 2022

Appendix 1 – Location map

Appendix 1 – Location map

BA/2022/0312/ADV - Hickling Broad, Staithe Road, Hickling



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Planning Committee

11 November 2022

Agenda item number 7.2

Enforcement- Land at North End Thorpe next Haddiscoe

Report by Head of Planning

Summary

An Enforcement Notice has been served which was not written in full accordance with the resolution of Planning Committee and so is invalid.

Recommendation

That the Enforcement Notice be withdrawn.

1. Background

- 1.1. In early 2020, reports were received of development taking place at a site off North End in Thorpe-next-Haddiscoe. On investigation, it was found that a dismantled, large storage building had been brought onto the site. Discussions with the operator established that they were storing the dismantled building on-site, pending resale or use elsewhere. In May 2020, further reports of development were received, and it was found that various structures and items of leisure and domestic paraphernalia had been brought onto the site. In addition, hardstanding had been put down at the site entrance, paths had been laid and a hedge planted.
- 1.2. This is a remote location with a strongly rural character, where the neighbouring land use is primarily agricultural. It was considered that the cumulative impact of the storage of the various structures and items, plus the laying of paths and fencing, had had the effect of altering the character of the land from rural countryside to having the appearance of a leisure plot and land used for storage. Planning permission is required for such a change of use. No application had been made and the operator, who had been advised that the activities on the site were unacceptable in planning terms, had failed to clear the site as requested.
- 1.3. A report was presented to the 4 December 2020 meeting of the Planning Committee with the following recommendation:

“ it is recommended that an Enforcement Notice is served requiring the clearance of the site and the cessation of its use as a leisure plot and for storage. A compliance period of 4 months would be appropriate.”

Member resolved unanimously to support the recommendation

2. The Enforcement Notice

- 2.1. The Enforcement Notice was served on 12 January 2021. The requirements of the Notice were for the operator to remove all the structures and equipment on the site, including the removal of the paths and the hedging.
- 2.2. An overall compliance period of four months was given.
- 2.3. Members will observe that the requirements of the Enforcement Notice as served were not in full accordance with the resolution of the Planning Committee, in that the requirement for the “ ... cessation of (the) use as a leisure plot and for storage” was omitted.

3. The legal issues

- 3.1. The Authority’s Scheme of Delegation in force in December 2020 delegated to officers the authority to serve an Enforcement Notice “In cases of urgency and (subject to consultation (if possible) with the Chair, or in the absence of the Chair the Vice-Chair, of the Planning Committee)” (May 2019 version para 39 (iii)). Clearly, this was not a case of urgency and the matter was, in any event, considered by Planning Committee, so the only authority for this Enforcement Notice was with the Planning Committee. As the Enforcement Notice as issued did not accord with the resolution of the Planning Committee, it is without legal authority and invalid.

4. Legal advice and next steps

- 4.1. The legal advice is that the Enforcement Notice does not accord with the resolution of the Planning Committee as it doesn’t deliver or require what is the cessation of the use and it must therefore be withdrawn.
- 4.2. The withdrawal of an Enforcement Notice is a straightforward process.
- 4.3. Having withdrawn it, however, it will then be necessary to make an assessment as to whether the remaining development on site constitutes a breach of planning control and, if it does, whether it is expedient to serve a further Enforcement Notice. The withdrawal of one Enforcement Notice does not preclude an LPA from the service of a further one.
- 4.4. At the most recent site visit on 12 September 2022, there were stacked timber posts, roofing sheets and small amounts of other materials on the site, plus minor domestic items including a fire pit and some seating. This was not so extensive as to constitute a storage use. The site had been strimmed since a visit earlier in the summer, when it had been very overgrown. It no longer had the domestic appearance it had had when the gazebo and patio structures were present. The paths and planting remained but, as noted in the report to the 1 April 2022 Planning Committee, the site will naturalise over

time. It is considered, on balance, that the remnant materials and structures do not constitute development and further action is not justified.

5. Conclusion and recommendation

- 5.1. The omission of part of the resolution from the Enforcement Notice was an error, and is regrettable, but it nonetheless has consequences for the validity of the Notice. The Enforcement Notice is legally invalid and must be withdrawn.
- 5.2. Whilst there has not been full compliance with the Enforcement Notice, sufficient works have been completed to overcome the principal issues and address the breaches so it is not considered necessary to consider further action.
- 5.3. It is recommended that the Enforcement Notice be withdrawn.

Author: Cally Smith

Date of report: 28 October 2022

Appendix 1 – Location plan

Appendix 1 – Location map



Planning Committee

11 November 2022

Agenda item number 8

Enforcement update

Report by Head of Planning

Summary

This table shows the monthly updates on enforcement matters. The financial implications of pursuing individual cases are reported on a site by site basis.

Recommendation

To note the report.

| Committee date | Location | Infringement | Action taken and current situation |
|----------------|--------------------|---------------------------|---|
| 31 March 2017 | Former Marina Keys | Untidy land and buildings | <ul style="list-style-type: none">• Authority granted to serve Section 215 Notices• Some clearance works April – June 2017• Planning application for redevelopment submitted. December 2018• Revised planning application submitted. 1 April 2019• Planning Committee 19 July 2019: Resolution to grant planning permission• Arson at building, with severe damage. 18 August 2019 |

| Committee date | Location | Infringement | Action taken and current situation |
|-------------------|--|------------------------------|--|
| | | | <ul style="list-style-type: none"> • Works underway to secure and commence agreed demolition. 16 December 2019 • Site sold and application received to demolish building (and other amendments to scheme) 20 February 2020 • Demolition completed and site almost cleared. November 2020. • Hoardings removed and site mainly cleared. November 2021. • Officers recommend file closed as no further action expedient. Agreed, but members requested to be kept informed of progress. 3 December 2021. • Remaining material largely spread across site. Development scheme being worked up. 24 October 2022. |
| 14 September 2018 | Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter | Unauthorised static caravans | <ul style="list-style-type: none"> • Authority given to serve an Enforcement Notice requiring the removal of unauthorised static caravans on land at the Beauchamp Arms Public House should there be a breach of planning control and it be necessary, reasonable and expedient to do so. • Site being monitored. October 2018 to February 2019. • Planning Contravention Notices served 1 March 2019. • Site being monitored 14 August 2019. • Further caravan on-site 16 September 2019. • Site being monitored 3 July 2020. • Complaints received. Site to be visited on 29 October 2020. • Three static caravans located to rear of site appear to be in or in preparation for residential use. External works requiring planning permission (no application received) underway. Planning Contravention Notices served 13 November 2020. |

| Committee date | Location | Infringement | Action taken and current situation |
|----------------|----------|--------------|--|
| | | | <ul style="list-style-type: none"> • Incomplete response to PCN received on 10 December. Landowner to be given additional response period. • Authority given to commence prosecution proceedings 5 February 2021. • Solicitor instructed 17 February 2021. • Hearing date in Norwich Magistrates Court 12 May 2021. • Summons issued 29 April 2021. • Adjournment requested by landowner on 4 May and refused by Court on 11 May. • Adjournment granted at Hearing on 12 May. • Revised Hearing date of 9 June 2021. • Operator pleaded 'not guilty' at Hearing on 9 June. Trial scheduled for 20 September at Great Yarmouth Magistrates Court. • Legal advice received in respect of new information. Prosecution withdrawn and new PCNs served on 7 September 2021. • Further information requested following scant PCN response and confirmation subsequently received that caravans 1 and 3 occupied on Assured Shorthold Tenancies. 27 October 2021 • Verbal update to be provided on 3 December 2021 • Enforcement Notices served 30 November, with date of effect of 29 December 2021. Compliance period of 3 months for cessation of unauthorised residential use and 4 months to clear the site. 6 Dec. 2021 • Site to be visited after 29 March to check compliance – 23 March 2022 • Site visited 4 April and caravans appear to be occupied. Further PCNs served on 8 April to obtain clarification. There is a further caravan on site. 11 April 2022 |

| Committee date | Location | Infringement | Action taken and current situation |
|-----------------|---|---|---|
| | | | <ul style="list-style-type: none"> • PCN returned 12 May 2022 with confirmation that caravans 1 and 3 still occupied. Additional caravan not occupied. • Recommendation that LPA commence prosecution for failure to comply with Enforcement Notice. 27 May 2022 • Solicitor instructed to commence prosecution. 31 May 2022 • Prosecution in preparation. 12 July 2022 |
| 8 November 2019 | Blackgate Farm, High Mill Road, Cobholm | Unauthorised operational development – surfacing of site, installation of services and standing and use of 5 static caravan units for residential use for purposes of a private travellers' site. | <ul style="list-style-type: none"> • Delegated Authority to Head of Planning to serve an Enforcement Notice, following liaison with the landowner at Blackgate Farm, to explain the situation and action. • Correspondence with solicitor on behalf of landowner 20 Nov. 2019. • Correspondence with planning agent 3 December 2019. • Enforcement Notice served 16 December 2019, taking effect on 27 January 2020 and compliance dates from 27 July 2020. • Appeal against Enforcement Notice submitted 26 January 2020 with a request for a Hearing. Awaiting start date for the appeal. 3 July 2020. • Appeal start date 17 August 2020. • Hearing scheduled 9 February 2021. • Hearing cancelled. Rescheduled to 20 July 2021. • Hearing completed 20 July and Inspector's decision awaited. • Appeal dismissed with minor variations to Enforcement Notice. Deadline for cessation of caravan use of 12 February 2022 and 12 August 2022 for non-traveller and traveller units respectively, plus 12 October 2022 to clear site of units and hardstanding. 12 Aug 21 • Retrospective application submitted on 6 December 2021. |

| Committee date | Location | Infringement | Action taken and current situation |
|-----------------|--|--|--|
| | | | <ul style="list-style-type: none"> • Application turned away. 16 December 2021 • Site visited 7 March 2022. Of non-traveller caravans, 2 have been removed off site, and occupancy status unclear of 3 remaining so investigations underway. • Further retrospective application submitted and turned away. 17 March 2022 • Further information on occupation requested. 11 April 2022 • No further information received. 13 May 2022 • Site to be checked. 6 June 2022 • Site visited and 2 caravans occupied in breach of Enforcement Notice, with another 2 to be vacated by 12 August 2022. Useful discussions held with new solicitor for landowner. 12 July 2022. • Further site visited required to confirm situation. 7 September 2022 • Site visit 20 September confirmed 5 caravans still present. Landowner subsequently offered to remove 3 by end October and remaining 2 by end April 2023. 3 October 2023. • Offer provisionally accepted on 17 October. Site to be checked after 1 November 2022. |
| 4 December 2020 | Land to east of North End, Thorpe next Haddiscoe | Unauthorised change of use to mixed use of a leisure plot and storage. | <ul style="list-style-type: none"> • Authority given for the service of Enforcement Notices. • Section 330 Notices served 8 December 2020. • Enforcement Notice served 12 January 2021 with compliance date 12 February 2021. • March 2021 - Some clearance commenced. 3-month compliance period. • Site to be checked for progress. April 2021 |

| Committee date | Location | Infringement | Action taken and current situation |
|----------------|--|-----------------------------------|---|
| | | | <ul style="list-style-type: none"> • Progress being monitored. May 2021 • Site not cleared by deadline. Operator given a further period. June 2021 • Negotiations underway. July 2021 • Further clearance, but incomplete. 25 August 2021 • Further clearance. Inspection needed. 22 September 2021 • Landowner given to end of year to complete clearance. 22 October 2021 • Further material removed, but some work required for compliance. Correspondence with landowner. 17 January 2022 • File review underway. 7 February 2022 • Verbal update and recommendation to be provided at meeting. • Direct action authorised. 1 April 2022. • Discussions with contractors underway. 11 April 2022 • Landowner given to 31 May to clear site. Site visit 12 May showed no further works undertaken. 13 May 2022 • Site to be checked for progress. 6 June 2022 • Site visited and sectional building found to have been moved to adjacent land; no other progress. 12 July 2022 • Legal advice received. 16 September 2022. • See separate report on agenda. November 2022 |
| 8 January 2021 | Land east of Brograve Mill, Coast Road, Waxham | Unauthorised excavation of scrape | <ul style="list-style-type: none"> • Authority given for the service of Enforcement Notices. • Enforcement Notice served 29 January 2021. • Appeal against Enforcement Notice received 18 February 2021. • Documents submitted and Inspector's decision awaited. September 2021 |

| Committee date | Location | Infringement | Action taken and current situation |
|-------------------|--|--|---|
| | | | <ul style="list-style-type: none"> • PINS contacted; advised no Inspector allocated yet. 20 October 2022. |
| 13 May 2022 | Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter | Unauthorised operation development comprising erection of workshop, kerbing and lighting | <ul style="list-style-type: none"> • Authority given by Chair and Vice Chair for service of Temporary Stop Notice requiring cessation of construction 13 May 2022 • Temporary Stop Notice served 13 May 2022. • Enforcement Notice and Stop Notice regarding workshop served on 1 June 2022 • Enforcement Notice regarding kerbing and lighting served on 1 June 2022 • Appeals submitted against both Enforcement Notices. 12 July 2022 |
| 21 September 2022 | Land at Loddon Marina, Bridge Street, Loddon | Unauthorised static caravans | <ul style="list-style-type: none"> • Authority given to serve an Enforcement Notice requiring the cessation of the use and the removal of unauthorised static caravans. • Enforcement Notice served. 4 October 2022. • Enforcement Notice withdrawn on 19 October due to minor error; corrected Enforcement Notice re-served 20 October 2022. |

Author: Cally Smith

Date of report: 27 October 2022

Planning Committee

11 November 2022

Agenda item number 9

Coastal Adaptation SPD Consultation

Report by Planning Policy Officer

Summary

The Coastal Adaptation Supplementary Planning Document (SPD) has been produced by East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council and Broads Authority Planning Policy Teams as well as Coastal Partnership East Officers. It elaborates on national and local coastal change adaptation policy. It is now ready for formal consultation.

Recommendation

It is recommended that:

- 1: Planning Committee endorse the Coastal Adaptation SPD for consultation and recommend that Broads Authority also endorse the SPD for consultation.
 - 2: The Head of Planning, in consultation with the Chair of Planning Committee, is authorised to make any modifications and presentational or typographical amendments to the draft Coastal Adaptation SPD that arise from other relevant Local Planning Authority sign-off committees, prior to it being published for formal consultation.
-

1. Introduction

- 1.1. The purpose of this report is to recommend the draft Coastal Adaptation Supplementary Planning Document (SPD) be published for formal public consultation.
- 1.2. A partnership of East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority, and the shared Coastal Partnership East team (CPE) has prepared the draft Coastal Adaptation SPD, which has been based on consultation responses received to the initial consultation.
- 1.3. The purpose of the draft SPD is to provide guidance on aligned policy approaches along the coast and to take a holistic (whole coast) approach, which follows from the Statement of Common Ground on Coastal Zone Planning agreed between the partnership authorities in September 2018 ([Duty to Cooperate - Norfolk and Suffolk Coastal Authorities Statement of Common Ground pc170818 \(broads-authority.gov.uk\)](#)). In doing so, this SPD will ensure planning guidance is up to date, aid the interpretation and delivery of planning policies, and provide case study examples of coastal adaptation best practice.

- 1.4. The draft SPD supports the implementation of planning policies relating to coastal adaptation in the following local planning authorities:
- East Suffolk Council (Suffolk Coastal Local Plan [2020] and Waveney Local Plan [2019])
 - Great Yarmouth Borough Council (Local Plan Part 1 [2015] and Local Plan Part 2 [2021])
 - North Norfolk District Council (Core Strategy [2008])
 - The Broads Authority (The Broads Local Plan [2019])
- 1.5. Guidance provided in the draft SPD focusses on the potential opportunities for coastal adaptation as set out in the relevant policies of the above Local Plans, including development in the Coastal Change Management Area (CCMA), rollback and relocation of buildings and infrastructure at risk to coastal change now and in the future, and enabling development to support coastal adaption projects.
- 1.6. The fundamental principle of risk management and planning policy in coastal areas is that of Integrated Coastal Zone Management (ICZM), which is a process that requires the adoption of a joined-up and participative approach towards the planning and management of the many different elements in coastal areas (land and marine). The partnership authorities have and continue to implement an ICZM approach, as evidenced by the Norfolk and Suffolk Coastal Authorities Statement of Common Ground for Coastal Zone Planning, and as signatories to the Coastal Concordat for England. The draft SPD is a further example of the partnership authorities taking a proactive approach to ICZM to ensure individuals and organisations at risk from coastal change are aware of the risks and can take action to adapt to the risks.
- 1.7. An SPD cannot create new or amend existing planning policies nor can it prescribe that particular areas of land be developed for particular uses; this is the role of the wider development plans of each local planning authority (LPA). The purpose of the SPD therefore is to provide guidance on the correct interpretation of planning policy and aid the implementation of relevant policies. When adopted the SPD will be a material consideration in determining planning applications.
- 1.8. While we hope the draft SPD provides useful guidance for a range of scenarios it will not be possible to address the complexity of issues in every scenario. As with all coastal related development projects, early engagement with the LPA and CPE will therefore always be beneficial to manage risks to life and property in a timely manner.
- 1.9. The draft SPD is supported by a Consultation Statement (Appendix 2), which sets out the representations submitted to the initial consultation (4 September 2020 - 16 October 2020), the main issues raised, the partnership response to each representation, and identifies changes made to the draft SPD as a result of representations. This initial consultation, to which 288 comments were received, has been invaluable in shaping the draft SPD.

- 1.10. Throughout the preparation of the draft SPD a steering group comprised of officers from the partnership authorities and the shared Coastal Partnership East team has met regularly to consider the consultation responses and draft the SPD.
- 1.11. A Strategic Environmental Assessment Screening Opinion was undertaken and concluded that a full Strategic Environmental Assessment would not be necessary. A Habitats Regulations Assessment Screening Statement was also undertaken and concluded that the draft SPD will not lead to likely significant effects on protected Habitat sites. These conclusions have been considered and agreed with the statutory bodies (Environment Agency, Historic England, and Natural England). See Appendices 3 and 5.
- 1.12. An Equality Impact Assessment Screening Opinion (Appendix 5) was undertaken and concludes that the draft SPD would have no differential negative impacts on those with protected characteristics.
- 1.13. The draft SPD has been produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- 1.14. The consultation on the draft SPD will be carried out in accordance with the Statements of Community Involvement of the respective local authorities.
- 1.15. The scale of the draft SPD, in covering the coast from Holkham in North Norfolk to Felixstowe in East Suffolk, requires consideration of the draft SPD by a number of members and through a number of committees, as follows:
- ESC Local Plan Working Group
 - Broads Planning Committee
 - Broads Authority
 - GYBC Local Plan Working Party
 - GYBC Executive Leadership Team
 - GYBC Policy & Resources Committee
 - NNDC Planning Policy & Built Heritage Working Party
 - NNDC Cabinet
- 1.16. In order to ensure comments and suggested amendments to the draft SPD are agreed by all local authorities involved, it is recommended that responsibility to agree modifications to the draft SPD arising from one or more committee meeting are delegated to the respective service heads for planning and coastal management in consultation with the relevant Cabinet member for Planning and Coastal Management, or equivalent – for the Broads Authority this would be the Head of Planning in agreement with the Chair of Planning Committee.

2. The Coast of the Broads

- 2.1. There is a short stretch of coast in the Broads. There is not much, if any, development along that stretch. It is an open stretch of coast with the only real man-made structures being groynes. Indeed, the adopted policy of the Local Plan for the Broads seeks to maintain the open nature of the coast in the Broads.
- 2.2. Whilst the stretch of coast in the Broads is different to some of the coast in the areas of the other partner authorities, and perhaps so too are the pressures of development and the pressures of any coastal change, it is prudent to collaborate and consider the stretch of coast as a whole rather than arbitrary Local Planning Authority boundaries.

3. Consultation

- 3.1. The consultation will run for at least 6 weeks and will likely start around the start of January 2023¹. All the partner authorities will advertise the consultation on their websites and on social media, as well as write to a consolidated list of usual planning policy consultees. The consultation will be hosted on the East Suffolk website and using their consultation software.

4. Next steps

- 4.1. The partner authorities will collate and respond to all the comments received. Changes may be made to the SPD. It is not envisaged that another round of consultation will be required; it is intended that changes be made and then the SPD adopted by each of the partner authorities.

Author: Natalie Beal

Date of report: 01 November 2022

Appendix 1 – Draft Coastal Adaptation SPD

The following appendices are available to view on [Planning Committee - 11 November 2022 \(broads-authority.gov.uk\)](https://broads-authority.gov.uk)

Appendix 2 – Consultation Statement

Appendix 3 – Strategic Environmental Assessment Screening Opinion

Appendix 4 – Habitats Regulations Assessment Screening Statement

Appendix 5 – Equality Impact Assessment Screening Opinion

¹ This is because the document needs to go through the Committee cycles of 4 different Local Planning Authorities and then be converted to East Suffolk's consultation software.

Draft Coastal Adaptation Supplementary Planning Document

October 2022

CONTENTS

| | | |
|----------|---|-----------|
| 1 | INTRODUCTION | 1 |
| 2 | CONTEXT: HOMES, BUSINESSES, COMMUNITIES, AND ENVIRONMENT AFFECTED BY COASTAL CHANGE | 3 |
| | What are the coastal processes and geology affecting the coast? | 3 |
| | What are the economic, social, and environmental benefits enjoyed along the coast and how are they affected by coastal processes? | 3 |
| | How is and will climate change affect the coast? | 5 |
| 3 | COASTAL MANAGEMENT MEASURES AND POLICIES..... | 7 |
| | Introduction | 7 |
| | National Policy and Guidance | 7 |
| | Local Policy..... | 9 |
| | Local Plan policies..... | 12 |
| 4 | DEVELOPMENT IN THE COASTAL CHANGE MANAGEMENT AREA | 13 |
| | Introduction | 13 |
| | What types of development can be appropriate in a CCMA | 14 |
| | Coastal Erosion Vulnerability Assessment (CEVA)..... | 21 |
| 5 | ROLLBACK AND RELOCATION | 25 |
| | Introduction | 25 |
| | Residential land-uses affected by coastal erosion | 26 |
| | Commercial, community, business, infrastructure and agricultural uses affected by coastal erosion | 28 |
| | Habitats affected by coastal erosion | 30 |
| | Remediation, demolition and treatment of existing sites and their uses | 30 |
| | Acquisition of land for relocation and rollback | 31 |
| 6 | ‘ENABLING’ DEVELOPMENT..... | 32 |
| | Introduction | 32 |
| | What is ‘enabling’ development?..... | 32 |
| | Enabling development and coastal adaptation/rollback..... | 32 |
| | Example scenarios for enabling development | 33 |
| | Public benefit(s)..... | 33 |
| | Enabling development to implement coastal risk management structures..... | 35 |

| | |
|---|-----------|
| Lifespan of the proposed development..... | 35 |
| Viability and enabling development..... | 35 |
| Enabling development and legal agreements..... | 36 |
| Key considerations | 36 |
| APPENDIX 1 – NORFOLK AND SUFFOLK COASTAL AUTHORITIES STATEMENT OF COMMON GROUND COASTAL ZONE PLANNING (SEPTEMBER 2018) | 38 |
| APPENDIX 2 – ORGANISATION ROLES & RESPONSIBILITIES..... | 43 |
| APPENDIX 3 – COASTAL EROSION VULNERABILITY ASSESSMENT (CEVA) TEMPLATE..... | 46 |
| APPENDIX 4 – CASE STUDIES | 50 |
| APPENDIX 5 – EXAMPLE MODEL CONDITIONS | 72 |
| APPENDIX 6 – NEIGHBOURHOOD PLAN GUIDANCE | 74 |
| APPENDIX 7 – GLOSSARY | 76 |

1 INTRODUCTION

- 1.1 A partnership of East Suffolk Council (ESC), Great Yarmouth Borough Council (GYBC), North Norfolk District Council (NNDC), The Broads Authority (The Broads), and the shared Coastal Partnership East team (CPE)¹ has prepared the draft Coastal Adaptation Supplementary Planning Document (SPD), which has been based on consultation responses received to the initial consultation (held between 4 September 2022 and 16 October 2020). The purpose of this SPD is to provide guidance on aligned policy approaches along the coast (see figure 1) and to take a holistic (whole coast) approach, which follows from the Statement of Common Ground on Coastal Zone Planning (Appendix 1) agreed between the partnership authorities in September 2018 and which remains relevant. In doing so, 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.
- 1.2 The objectives of producing the SPD are:
- Ensuring Coastal Communities continue to prosper and can adapt to coastal change; and
 - To provide detailed guidance to developers, landowners, development management teams, and elected members on the interpretation of policies with a whole coast approach.
- 1.3 The SPD cannot create new or amend existing planning policies nor can it prescribe that particular areas of land be developed for particular uses; this is the role of the wider development plans of each local planning authority (LPA).
- 1.4 The purpose of the SPD therefore is to provide guidance on the correct interpretation of planning policy and aid the implementation of relevant policies. When adopted the SPD will be a material consideration in determining planning applications.
- 1.5 While we hope this document provides useful guidance for a range of scenarios it will not be possible to address the complexity of issues in every scenario. As with all coastal related development projects, early engagement with the LPA and CPE will always be encouraged to maximise opportunities and manage risks to life and property in a timely manner.

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

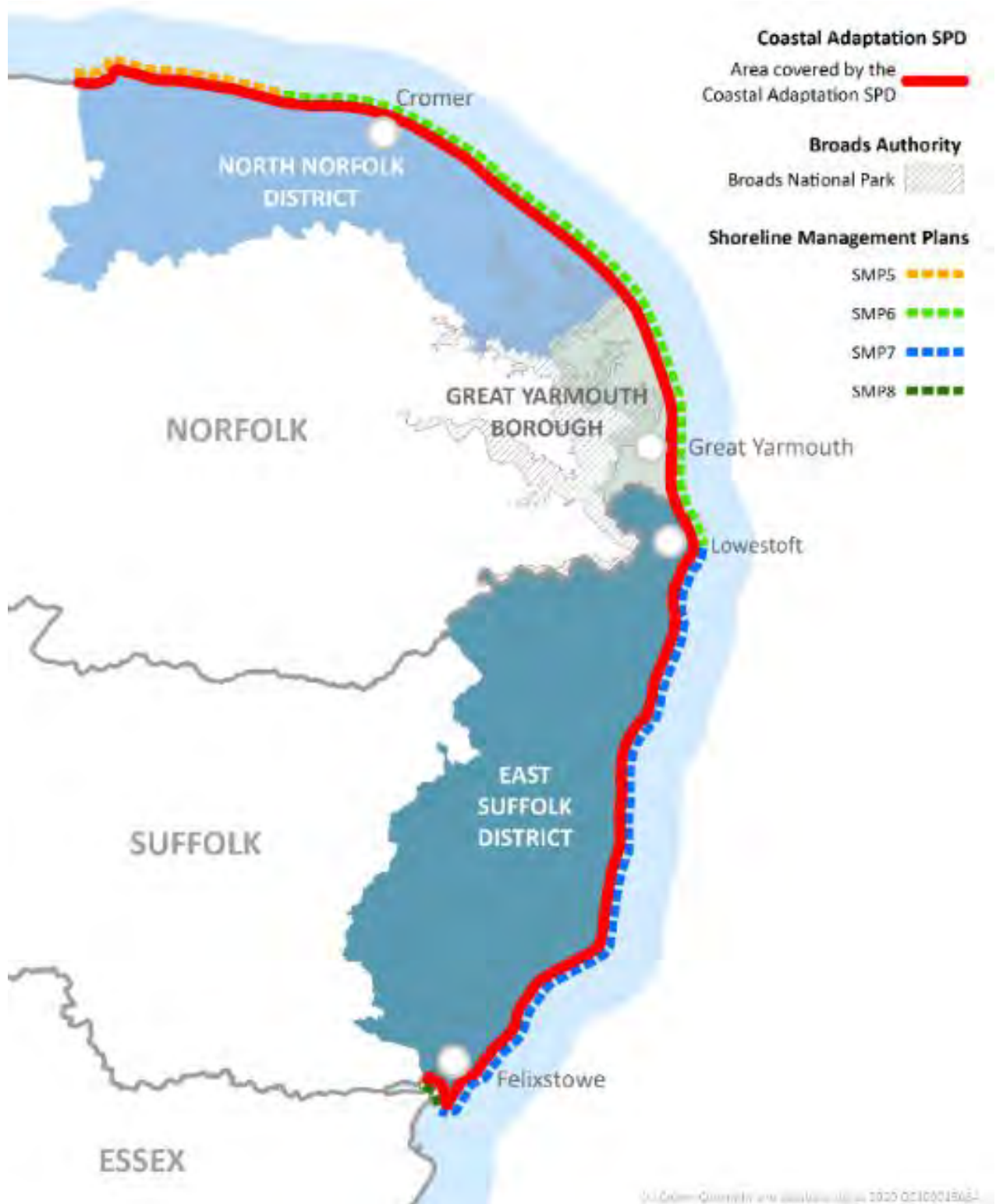


Figure 1 - The area to which the SPD applies

2 CONTEXT: HOMES, BUSINESSES, COMMUNITIES, AND ENVIRONMENT AFFECTED BY COASTAL CHANGE

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

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

What are the coastal processes and geology affecting the coast?

- 2.2 The geology of this stretch of the Norfolk and Suffolk coast can be traced back to the Cretaceous Period, with the oldest chalk dating to approximately 140 million years old. The bedrock is today covered by glacial sands, silts, clays and gravels deposited and shaped through the action of ice and meltwater over the past 2 million years. Over the last 10,000 years following the last ice age, the sea level has risen and the East Anglian coast, as is recognisable today, was formed.
- 2.3 The coast is prone to erosion through natural processes such as storms, surges and high levels of ground water, resulting over thousands of years in continued changes to the coast. While these changes predominantly lead to erosion of the coast, there are areas where accretion (growth of land at the coast) of the coast occurs, which can present a variety of challenges and opportunities for coastal communities, and the environment. Coastal processes affect the coast in a variety of ways and detailed geomorphology and coastal processes for specific sections of the coast are set out in our Shoreline Management Plans² (SMP).

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

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

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

- 2.5 Large areas of the coast and inland coastal zone are covered by natural and historic environment designations. These designations seek to maintain areas, buildings and structures for the significant contribution they make in respect of natural beauty, heritage, geodiversity, special habitats, and biodiversity, some of which are of national and international importance.
- 2.6 The historic, cultural, and natural qualities of the coast attract many visitors every year and are an essential part of the successful local and regional economy. Other essential elements of the economy include agriculture, major ports and smaller harbours that sustain our maritime activities (from local fishing to global trade) and the diverse and growing energy sector, as well as the infrastructure that knits everything together. These benefits taken together make for an attractive place for leisure and recreation, to do business, as well as to live.



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

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

How is and will climate change affect the coast?

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



Stormy sea at Gorleston Harbour looking towards Great Yarmouth

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

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

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

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

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

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

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

3 COASTAL MANAGEMENT MEASURES AND POLICIES

Introduction

- 3.1 The fundamental principle of risk management and planning policy in coastal areas is that of Integrated Coastal Zone Management (ICZM), which is a process that requires the adoption of a joined-up and participative approach towards the planning and management of the many different elements in coastal areas (land and marine). The partnership authorities have and continue to implement an ICZM approach, as evidenced by the Norfolk and Suffolk Coastal Authorities Statement of Common Ground for Coastal Zone Planning. As coastal erosion risk management authorities, East Suffolk Council, Great Yarmouth Borough Council, and North Norfolk District Council, are signatories to the Coastal Concordat for England⁷.
- 3.2 This chapter seeks to provide an overview of coastal management and planning policy at the national, local and neighbourhood scales, whilst recognising that the complexity and scale of involvement from a number of organisations and individuals cannot be neatly captured in one chapter. For this reason, Appendix 2 (Organisation Roles & Responsibilities) seeks to support this chapter and sets out the various roles, permissive powers and responsibilities of the key organisations that engage in coastal management and planning.

National Policy and Guidance

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

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

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

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

to facilitate a joined-up approach to tackling coastal erosion risk in a manner consistent with the principles of ICZM.

- 3.5 The ICZM approach is carried into the National Planning Policy Framework (NPPF)¹⁰, which sets the Government's planning policies at the national level. Local Plans, which set the planning policies for LPA areas, must be consistent with the policies set out in the NPPF to be deemed 'sound' and therefore capable of being adopted and used to determine planning applications across LPA areas. Thus, Local Plan policies must be consistent with the Government's ICZM approach.
- 3.6 The NPPF also sets out that Local Plans should manage the risks from development in areas at risk of coastal change. To do this Coastal Change Management Areas (CCMA) should be identified within Local Plans and inappropriate development within CCMA should be avoided. A CCMA is defined as an area identified in plans as likely to be affected by physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion.
- 3.7 The Planning Practice Guidance for Flood Risk and Coastal Change¹¹ provides guidance as to how NPPF policy can be implemented through the preparation of land use plans (e.g. Local Plans and Neighbourhood Plans) and the determination of planning applications.
- 3.8 The above documents are focussed on the terrestrial planning system, in other words land based as opposed to the marine based planning system. The boundary between the two systems is between the mean spring high and low water marks, creating an overlapping area where both the terrestrial and marine planning systems operate. Marine planning¹² is governed by the Government's UK Marine Policy Statement (MPS)¹³ and the Marine Management Organisation's (MMO) Marine Plans. The MPS provides the national framework for the preparation of Marine Plans and decision making affecting the marine environment, while Marine Plans provide detailed policy and spatial guidance for an area and help ensure that decisions within a plan area contribute to delivery of UK, national and any area specific policy objectives. The MPS and Marine Plans are managed in an integrated and holistic way, in line with the principles of ICZM. The Marine Plans relevant to the SPD area are:
- East Inshore and Offshore Marine Plans (2014)¹⁴
 - South East Inshore Marine Plan (2021)¹⁵
- 3.9 A marine licence may be required for any relevant developments¹⁶ which may impact the marine environment, such as coastal risk management structures.
- 3.10 The coast is also home to a large number of natural and historic environment designations, from large scale Special Areas of Conservation to small listed buildings, and across the terrestrial and marine planning realms. These designations are often susceptible to coastal change which can result in loss of

¹⁰ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/100575/9/NPPF_July_2021.pdf

¹¹ <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

¹² More information about UK marine planning is available here: [Explore marine plans - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/uk-marine-policy-statement)

¹³ <https://www.gov.uk/government/publications/uk-marine-policy-statement>

¹⁴ [East Marine Plans - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/uk-marine-policy-statement)

¹⁵ [The South East Marine Plan Documents - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/uk-marine-policy-statement)

¹⁶ Information concerning the need for a marine license for development is available here: [Explore marine plans - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/uk-marine-policy-statement)

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

Local Policy

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

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

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

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

3.13 Coastal processes¹⁷ make for a dynamic coast, and decisions made at one part of the coast can influence coastal processes at other parts of the coast. It is therefore not always possible or desirable to meet all of these objectives at every stretch of the coast and a balanced approach must be taken to ensure the effective and sustainable management of the coast for all, both now and in the future.

¹⁷ Natural processes driven by geology, tides, weather and climate change that shape the coast.



Sea defences/rock berm at Happisburgh with cliff erosion shown

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

¹⁸ [EACG \(East Anglian Coastal Group\) - SMP 5](#)

¹⁹ [EACG \(East Anglian Coastal Group\) - SMP 6](#)

²⁰ [Shoreline Management Plan 7 \(suffolksmp2.org.uk\)](#)

²¹ [EACG \(East Anglian Coastal Group\) - SMP 8](#)



Eroded cliffs at East Runton

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

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

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

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

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

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

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

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

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

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

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

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

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

Local Plan policies

- 3.19 This section highlights the key Local Plan policies addressing coastal planning matters within the partnership authorities' Local Plans.
- 3.20 The following policies identify the CCMA and the circumstances whereby development may be acceptable within the CCMA:
- ESC Suffolk Coastal Local Plan policy SCLP9.3 (Coastal Change Management Area)
 - ESC Waveney Local Plan policy WLP8.25 (Coastal Change Management Area)
 - GYBC Local Plan Part 2 policy GSP4 (New Development in Coastal Change Management Areas)
 - NNDC Core Strategy policy EN11 (Coastal Erosion), the CCMA is referred to as the Coastal Erosion Constraint Area. Emerging NNDC Local Plan policy CC5 (Coastal Change Management) is also relevant as the emerging plan has reached an advanced stage.
- 3.21 While the Broads Local Plan does not identify a CCMA, policy SSCOAST (The Coast) provides a framework whereby operational development in the coastal zone, as identified on the Broads Local Plan policies map, will generally not be permitted unless in exceptional circumstances.
- 3.22 The above policies, except Broads Local Plan policy SSCOAST (The Coast), also require Coastal Erosion Vulnerability Assessments (CEVA) to support relevant planning applications. NNDC Core Strategy policy EN11 (Coastal Erosion) does not refer to CEVA by name but does require evidence of the vulnerability of proposed development to coastal change to support planning applications.
- 3.23 The following policies support rollback and relocation of development at risk from coastal change:
- ESC Suffolk Coastal Local Plan policy SCLP9.4 (Coastal Change Rollback or Relocation)
 - ESC Waveney Local Plan policy WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion)
 - GYBC Local Plan Part 1 policy CS13 (Protecting Areas at Risk of Flooding or Coastal Change)
 - GYBC Local Plan Part 2 policy E2 (Relocation from Coastal Change Management Areas)
 - NNDC Core Strategy policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk). Emerging NNDC Local Plan policy CC6 (Coastal Change Adaptation) is also relevant as the emerging plan has reached an advanced stage.
- 3.24 The Broads Local Plan does not contain a policy regarding rollback and relocation of development at risk from coastal change as there is no development at risk from coastal change along The Broads coast. However, the effects of coastal change on the estuary in the form of permanent inundation is acknowledged and consideration must be given to this risk irrespective of the Local Plan policy context.

4 DEVELOPMENT IN THE COASTAL CHANGE MANAGEMENT AREA

Introduction

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

³⁰ Suffolk Coastal Local Plan and Waveney Local Plan policies map: <https://eastsuffolk.maps.arcgis.com/apps/webappviewer/index.html?id=f6a98a5e2ddc4c209729cd8a180645b4>
Great Yarmouth Local Plan policies map: <http://gybc.maps.arcgis.com/apps/webappviewer/index.html?id=ad21a10d70144a44949037739fe5acfd>
North Norfolk Core Strategy policies map: <https://www.north-norfolk.gov.uk/tasks/planning-policy/proposals-map/>
The Broads Local Plan policies map: <https://www.broads-authority.gov.uk/planning/planning-policies/development/policies-maps-final-adopted-versions>

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

What types of development can be appropriate in a CCMA

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

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

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

4.7 The types of development this can include are:

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

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

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

Aerial view of Corton and showing cliffs, groynes and caravan parks



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

| Development Type | Short term (up to 2025) | Medium term (2025 – 2055) | Long term (2055 – 2105) | Notes |
|---|-------------------------|---------------------------|-------------------------|--|
| New permanent residential development, including replacement dwellings or change of use to a permanent dwelling | No | No | No | Not permitted within the CCMA. See relevant section for more information. |
| New permanent non-residential development | No | Possibly | Possibly | Assessment will take account of CEVA information and planning conditions are likely to be added in order to maintain the value to the community in perpetuity (for the lifetime of the development). See relevant section for more information. |
| Temporary and time limited development | Possibly | Yes | Yes | Assessment will take account of CEVA information and time limited conditions will be added to a planning consent. See relevant section for more information. |
| Open Land Uses (i.e. no buildings) | Yes | Yes | Yes | Assessment will take account of CEVA information and time limited conditions will be added to a planning consent. See relevant section for more information. |
| Changes of use (non-residential) | Possibly | Possibly | Possibly | Assessment will take account of CEVA information and time limited conditions will be added to a planning consent. See relevant section for more information. |
| Extensions (including householder development) | Possibly | Yes | Yes | Assessment will take account of CEVA information and in particular, the level of risk to life and property. See relevant section for more information. |
| Intensification of Use (non-residential) | No | Possibly | Possibly | Assessment will take account of CEVA information and type of use. |

| | | | | |
|---|----------|----------|----------|---|
| | | | | See relevant section for more information. |
| Redevelopment or reconfiguration of existing sites (non-residential) | No | Possibly | Possibly | Assessment will take account of CEVA information and time limited conditions will be added to a planning consent. See relevant section for more information. |
| Replacement of Development Affected by Coastal Change (non-residential) | No | Possibly | Possibly | Assessment will take account of CEVA information and type of use. Time limited conditions will be added to a planning consent. See relevant section for more information. |
| Essential Infrastructure and Community Uses | Possibly | Possibly | Possibly | Assessment will take account of CEVA information. See relevant section for more information. |

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

New permanent residential development

- 4.15 Each of the participating Local Planning Authorities, other than the Broads Authority, have adopted and emerging local plan policies that state that planning permission for permanent new residential development will not be permitted within the identified CCMA. This also includes replacement dwellings and changes of use of other buildings to permanent residential accommodation. For further clarity, this relates to all types of residential use, such as individual dwellings, sheltered housing, student accommodation, hostels, shared housing for disabled people, nursing homes and care homes, residential education and training centres.
- 4.16 If non-permanent residential development/ use is being proposed, an applicant should refer to the temporary and time-limited development/ uses section.

New non-residential development

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

Temporary and time-limited development/ uses

- 4.19 Temporary and time-limited development within a CCMA relates to development proposals that requires a coastal location and can be granted planning permission for a specific period of time in order to;
- reduce the risk to people and the development by taking account of the assessment of vulnerability; and
 - manage the removal of the development to minimise the impact on the community and on the natural and historic environment.
- 4.20 Development that is temporary (whether by its nature or by limiting its planning consent) is unlikely to constitute an increase in property or life at risk, provided it can be controlled in order to ensure its removal or relocation prior to the erosion risk becoming imminent. Temporary or time-limited development will often be considered as an appropriate response to coastal change and can help facilitate ‘adaptation’ to change. Also, as stated in the PPG³¹, ‘The use of modular forms of construction can mean buildings can be disassembled and reassembled in a new location as a way of minimising the cost of relocation.’ Such temporary and time-limited uses include, but are not limited to, use of land for caravans, mobile homes, temporary structures and land for open storage. In addition, some types of non-permanent residential development could be acceptable.
- 4.21 The result of such temporary development could, however, (individually or cumulatively) give rise to positive or negative impacts with regards to the character or viability of a settlement in the longer-term and this would need to be balanced in relation to the longer-term sustainability of that community.
- 4.22 It is difficult to define the lifetime of specific developments here, as each will have different characteristics, be located in a different part of a CCMA and potentially where a site spans across more than one risk area. Applicants would be expected to justify why they have adopted a given lifetime for the development when they are formulating their Coastal Erosion Vulnerability Assessment (CEVA) (see CEVA section). Developers, the Local Planning Authority and the Environment Agency should aim to agree what lifetime is acceptable, having regard to the anticipated impacts of coastal change taking into account climate change. Where the lifetime of the development is prescribed by the time in which coastal change is anticipated to impact on it, the lifetime of the development will be controlled by a specific time limited planning condition. Such a condition would require the review of the permission in relation to rates of coastal change and ensure the removal of the development prior to the anticipated impact of the coastal change. The condition would also be re-applied to a renewed planning consent, where erosion has progressed at a lower rate than predicted.
- 4.23 The lifetime of a non-residential development depends on the characteristics of that development. Applicants would be expected to justify why they have adopted a given lifetime for the development, for example, when they are preparing a Coastal Erosion Vulnerability Assessment

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

Open Land Uses

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

Changes of Use

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

Extensions (including householder development)

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

Intensification of Use (non-residential)

- 4.29 Intensification of the use of a building can increase the extent of risk to life, particularly where it is occupied on a permanent basis, but it is unlikely to increase the magnitude of property at risk. Intensification of use could be a means of improving the viability of a use, by securing greater investment in the maintenance of a property, which will be important in helping to counterbalance the degenerative effect of blight associated with coastal change. Proposals for intensification will frequently

not need planning permission, but where they do, they will need to be considered in light of the existing risk.

- 4.30 For intensification of the use of properties within the risk zone associated with the first epoch to be appropriate, an applicant should demonstrate that any increase in risk to life can be mitigated, for example through conditions or legal agreements. Beyond the first epoch, the principle of the intensification of a non-residential use is likely to be acceptable in the context of the existing risk to life, as the increase is likely to be minimal. The degree of control over the occupancy or use of the property may be pertinent, for example, if the proposal involves increasing the occupancy (either through the total number or extending the period of occupancy) of a building that is run or managed as part of a wider business this could pose less of a risk than an independently occupied building.

Redevelopment or reconfiguration of existing sites (non-residential)

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

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

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

Essential Infrastructure and Community Uses

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

impact on coastal change. In addition, development proposals should demonstrate that they would provide wider sustainability benefits that outweigh the predicted coastal change impact.

Coastal Erosion Vulnerability Assessment (CEVA)

- 4.36 The purpose of this section is to provide further detail and guidance on the need for and content of a Coastal Erosion Vulnerability Assessment (CEVA). It is important to take a risk based approach to new development in all areas at risk of coastal change. However, this needs to be balanced against the need to help maintain the integrity of coastal communities and businesses. Therefore, it is recognised that some forms of development or land use within the CCMA may be appropriate, providing the long-term aims of supporting adaptation to coastal change can be achieved and it does not add to existing risks.
- 4.37 A Coastal Erosion Vulnerability Assessment (CEVA) will establish whether proposed new development will be appropriate in a given location. The matrix below (Table 2) indicates which development proposals would be expected to prepare a CEVA, the level of detail required in relation to different types of development and in different locations. It is advised that applicants check with the relevant Local Planning Authority to ensure that a CEVA is required for the location of the proposed development and if required, agree the scope of the CEVA with the shared Coastal Partnership East Team.
- 4.38 As part of the planning process, the CEVA will be checked by the shared Coastal Partnership East Team to ensure that it has been prepared to an appropriate level of detail and is objective in its findings. If this is not the case, the applicant will be advised of where the CEVA needs improvement. On receipt of a compliant CEVA, the shared Coastal Partnership East team will provide a formal response on the application to the relevant planning team. To ensure the preparation of a compliant CEVA with the submission of a planning application, applicants are advised to consider pre-application advice from the relevant Local Planning Authority.
- 4.39 The purpose of the CEVA is to ensure the applicant:
- is aware of and understands the relevant policies associated with coastal change;
 - has demonstrated that the development will be safe through its planned lifetime, without increasing risk to life or property, or requiring new or improved coastal risk management measures;
 - has demonstrated that the proposed development will not increase the risk of coastal erosion elsewhere, for example from increased groundwater and surface water run-off, resulting in cliff destabilisation;
 - has demonstrated that the development will not impair the ability of communities and the natural environment to adapt sustainably to the impacts of a changing climate;
 - has considered the measures for managing the development at the end of its planned lifetime, including any proposals for the removal or relocation of the development before the site is immediately threatened by coastal change; and
 - that decisions taken on investment are made with a full understanding of the risks and uncertainties.

- 4.40 For practical reasons it is difficult to define the lifetime of development as each development will have different characteristics. For guidance, new permanent residential development should be considered for a minimum of 100 years, and non-residential development should be considered to have a lifetime of at least 75 years³². However, there is significant complexity and variety in the characteristics of non-residential development and therefore 75 years should be the starting point for assessment rather than a definitive figure. Applicants will be required to justify why they have adopted a given lifetime for the development when they are formulating their CEVA, and must demonstrate that the risks have been adequately assessed against the economic, social and environmental benefits of the development within the CCMA.
- 4.41 As a starting point, in attempting to justify a different design lifetime for a non-residential development proposal than that of 75 years, the following non-exhaustive list should be considered:
- the proposed land use/s,
 - whether the development would be permanent or temporary,
 - the vulnerability to coastal erosion of the proposed development, and
 - the ease and speed with which the proposed development could be moved, adapted or demolished.
- 4.42 If the development proposal comprises a mix of uses or different characteristics that would warrant the identification of multiple design lifetimes for elements of the overall development, the CEVA should adopt the longest development lifetime. For example, if a development proposal comprised a mix of permanent residential, retail and office uses, it may be considered that the development lifetime of the retail and office elements would be less than that of the 100 year residential element, perhaps 75 years. In this situation the CEVA should adopt the 100 year lifetime as the lifetime for the whole development proposal. Alternatively, the CEVA could comprise a number of assessments, each evidencing a different design lifetime for a specific element of the overall development.
- 4.43 The detail contained in the CEVA should be proportionate to the degree of risk and the scale, nature and location of the proposed development. Reflecting the requirements of the relevant Local Plan policies, the matrix below (Table 2) indicates which development proposals would be expected to be supported by a CEVA, the level of detail that would be required in relation to different types of development and in different locations.
- 4.44 The Broads has not identified a CCMA within its Local Plan due to their small stretch of coast and its undeveloped nature. The Broads therefore does not feature in the table below.

Table 2: CEVA matrix for development types

| Local Plan | Check | Permanent residential development | Non-residential development | Temporary development & uses (e.g. caravans) | Extensions to existing development | Modifications to existing development |
|----------------------|-------------|-----------------------------------|-----------------------------|--|------------------------------------|---------------------------------------|
| East Suffolk Council | Within CCMA | Not permitted | Level B | Level B | Level B | Level A |

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

| | | | | | | |
|--|--|---------------|---------|---------|---------|---------|
| (Suffolk Coastal Local Plan) | 30m risk zone ³³ | Level B | Level A | Level A | Level A | Level A |
| | 30m – 60m risk zone landward of coastal risk management structures in areas of soft cliffs ³⁴ | Level B | Level A | Level A | Level A | Level A |
| East Suffolk Council (Waveney Local Plan) | Within CCMA | Not permitted | Level B | Level B | Level B | Level A |
| | 30m risk zone | Level B | Level A | Level A | Level A | Level A |
| Great Yarmouth Borough Council (Great Yarmouth Local Plan Core Strategy) | Within CCMA | Not permitted | Level B | Level B | Level B | Level A |
| | 30m risk zone | Level B | Level A | Level A | Level A | Level A |
| North Norfolk District Council (North Norfolk Core Strategy) | Within Coastal Erosion Constraint Area (CECA) ³⁵ | Level B | Level B | Level B | Level B | Level A |
| North Norfolk District Council (emerging Local Plan) | Within CCMA | Not permitted | Level B | Level B | Level B | Level A |
| | 30m risk zone | Level B | Level A | Level A | Level A | Level A |

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

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

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

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

Level A CEVA

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

Level B CEVA

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

- 4.48 It would need to consider the following:

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

- 4.49 Development proposals within the CCMA will also need to:

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

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

5 ROLLBACK AND RELOCATION

Introduction

- 5.1 Across the SPD area there are a number of residential and commercial properties as well as businesses, and key infrastructure including roads and pathways, situated within the Coastal Change Management Areas, and at risk from erosion. This can have a direct effect upon the long-term sustainability of affected coastal communities, for example through the erosion of land, to the potential effects emanating from ‘blight’ and a reduced desire to invest in those properties and the wider area.
- 5.2 In light of these effects upon coastal communities, national policy requires local plans to make provision for development and infrastructure that needs to be relocated from Coastal Change Management Areas. Planning practice guidance advises that either formally allocating land in a Local Plan, or allowing for relocation where planning permission would normally be refused are two ways in which this could be achieved.
- 5.3 In response, each planning authority¹ within the partnership area includes policies in their Local Plans to help proactively rollback or relocate development in areas of risk to those areas further inland that are deemed ‘safer’ in a timely fashion, before they are impacted by coastal erosion.
- 5.4 The relevant policies with respect to rollback and relocation from each Local Plan³⁶ are set out below:
- Policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk) - North Norfolk Core Strategy, Policy CC6 Coastal Change Adaptation – emerging Local Plan
 - Policy E2 (Relocation from Coastal Change Management Areas) - Great Yarmouth Local Plan Part 2
 - Policy WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion) - Waveney Local Plan
 - Policy SCLP9.4 (Coastal Change Rollback or Relocation) - Suffolk Coastal Local Plan
- 5.5 The purpose of this chapter of the SPD therefore is to provide further detail and guidance on the interpretation of the above policies, particularly upon common issues such as how land or sites may be identified for rollback or relocation purposes; how such land may be acquired or identified; and how land, which has been vacated, should be managed or utilised in the future to the point at which it eventually eroded. The exploration of these issues has framed the sub-headings of this chapter below.
- 5.6 It is important to note that at the present time the Government does not offer ‘compensation’ for properties lost as a result of coastal change. Compensation is not a matter which can be considered under planning policy. Some government funding can be accessed to assist with demolition of residential properties under a Coastal Assistance Grant if they were purchased before 15 June 2009.

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

Residential land-uses affected by coastal erosion

- 5.7 The timely relocation or rollback of residential dwellings (in other words, well before they are at imminent risk of falling into the sea) is a key aim of the Local Plans, and is also in line with national planning and DEFRA policy. For this reason, differing weight may be given to some planning policies to help facilitate relocation.
- 5.8 When identifying alternative areas or land to enable sites to roll-back or relocate residential properties to, the Local Plans require those alternative areas to be compliant with a number of policy criteria. Whilst some of these criteria are shared by each Local Plan there are some differences, which reflects the nature and purpose of individual plans, and therefore greater interpretation on these matters are explored further below:
- 5.9 **General locational principles**
- 5.10 The North Norfolk (EN11) and Great Yarmouth (E2) Local Plan policies are broadly similar in their approach when guiding alternative areas or land to enable sites to roll-back or relocate residential properties to. These require sites to be within or adjacent to identified settlements, whilst outside either the Coastal Change Management Area (Great Yarmouth Local Plan) or Coastal Erosion Constraint Area (North Norfolk Local Plan).
- 5.11 Whilst the terms 'identified settlement', 'Coastal Change Management Area' and 'Coastal Erosion Constraint Area' are clearly defined within both Local Plans, the term adjacent is not. In most circumstances the preference will be for development to share a land boundary with an existing settlement (for example adjacent to a settlement's development limits/boundaries) as this helps to maintain a more sustainable form of development and helps to reduce the potential for isolated dwellings in the countryside.
- 5.12 Notwithstanding this preference, the term may also be more flexibly applied in order to take into account the prevailing character or function of each settlement, and in circumstances where it is not possible to share a land boundary e.g., where settlements do not have development limits/boundaries.
- 5.13 Similarly to the Great Yarmouth and North Norfolk Local Plans, the Waveney (WLP8.26) and Suffolk Coastal (SCLP9.4) Local Plan policies also require relocated sites to be located outside of their respective Coastal Change Management Area. Whilst there is no requirement for site's to be 'adjacent' to development limits/boundaries, the policies do permit relocation or rollback outside of settlement boundaries³⁷, but also requires those locations to exhibit a similar or improved level of sustainability with respect to access and facilities as per the original dwelling.
- 5.14 In simple terms this means that in interpreting the policy, the applicant will need to clearly demonstrate that the occupiers of the roll-back or relocated dwelling will not be disadvantaged with respect to accessing facilities (e.g. primary school, food shop, bus services, employment opportunities etc) than the location the original dwellings was in; and where possible, demonstrate an improved level of access to such facilities.

³⁷ Equivalent term to development limits or development boundary

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

Size of replacement/relocated properties

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

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

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

Identifying alternative areas or land

- 5.23 The relevant Local Plan policies are intended to aid coastal business owners and commercial operators to make longer-term decisions about investment and growth. For obvious operational and business reasons, it will not always be practicable to relocate businesses to sites outside the Coastal Change Management Area (for example, a tourism business that relies on its seashore location).

For this reason, some types of development will be permitted inside the CCMA (see table 1 – Development Matrix). Careful consideration of the precise risk in the particular area will need to be undertaken through a Coastal Erosion Vulnerability Assessment (CEVA).

- 5.24 The phasing or timing of relocation can be critical to the success of any rollback scheme. For practical and operational reasons a relocation may have to be spread over an extended period of time (a caravan site, for example). This can have implications for local communities as it could lead to a longer period of construction. At the same time it is recognised that an extended period of time may be needed to help absorb the costs and potential loss of business before the new site is fully established
- 5.25 Opportunities to relocate and redevelop within existing site boundaries may also be appropriate. This could include moving buildings away from the cliff edge to vacant land; reconfiguration of the layout of buildings within the site; reusing more vulnerable parts of the site for open land uses or other temporary uses. Therefore, in the short-term risk area, proposals for temporary uses, open land uses, some changes of use and small extensions may be acceptable. In both the medium and long-term areas within the CCMA, where the CEVA demonstrates there will be no increased risk to property or people as a result of the development, larger extensions, new buildings and some intensification of use may be permitted. A balance will need to be made between the risk associated with retaining a coastal location and the wider economic benefits for the operator and wider community. Proposals for development that demonstrates that this is the case and that the longer term coastal risk planning is incorporated, will be supported.
- 5.26 Where relocation to a new site is necessary, this should normally be located where it is accessible (or well-related³⁸) to the community from which it was displaced. Though this will depend on the specific type of use being relocated, this will normally mean no more than 100-200m away from the existing community and with appropriate highway links for vehicular and non-vehicular traffic.
- 5.27 There are some sports grounds and courses which are located on the coast, such as football pitches. Whilst some sports facilities are only for the benefit of their membership, almost all allow visitors and some are available to the public (to hire, for example). Some coastal golf courses are at high risk, as

³⁸ As per North Norfolk Local Plan Policy EN11

often they are on undefended stretches of the coast; Royal Cromer and Gorleston are two courses under particular threat of ‘losing’ some holes.

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

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



Habitats affected by coastal erosion

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

Remediation, demolition and treatment of existing sites and their uses

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

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

Acquisition of land for relocation and rollback

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

6 ‘ENABLING’ DEVELOPMENT

Introduction

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

What is ‘enabling’ development?

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

Enabling development and coastal adaptation/rollback

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

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

Example scenarios for enabling development

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

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

Public benefit(s)

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

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

Relocating residential dwellings

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

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

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

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

Relocating tourism accommodation

- 6.13 Coastal tourism is a hugely important part of the economy of North Norfolk, Great Yarmouth and East Suffolk, including the Broads. There are many caravan and camping sites and thousands of holiday homes available to rent, contributing hundreds of millions of pounds to the local economy through direct and indirect spending (on meals out, visiting tourism sites etc). Whilst such businesses tend to be privately-owned, they are also a vital source of employment, again both directly (caravan site staff, cleaners etc) and indirectly (from spending in local restaurants and tourism sites, and local suppliers of good and services to the sites etc). Allowing the continued use of such sites through rollback/relocation can therefore potentially retain considerable public benefits.

Relocating tourism facilities

- 6.14 In a similar way to tourism accommodation, coastal facilities specifically geared towards tourism (like amusement arcades and crazy golf courses) or catering to a mixed tourism and local market (like amusement parks and golf courses) generate considerable economic benefits, both directly (from employment) and indirectly (from wider spending). Such facilities can also constitute part of the wider tourism “offer” (of facilities and attractions) of an area. Whilst the direct public benefits may seem less immediately obvious than for (say) caravan parks, they often still exist. Several examples of where caravan and camping parks have been ‘rolled back’ are included in the case studies.

Relocating business premises

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

Relocating other types of use/development

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

Enabling development to implement coastal risk management structures

- 6.17 Communities or businesses may seek to support the implementation of coastal risk management measures along a stretch of coast in order to increase the resilience of properties or assets that are facing or are going to face the impacts of coastal change. In some circumstances to assist with funding these coastal risk management structures, it may be possible to generate funding through enabling development. For example, a residential development outside of the erosion risk zone may be able to generate funds to contribute towards temporary defences in that community. Each circumstance and location will be different and as such early engagement with the planning team and Coastal Partnership East would be required.
- 6.18 The public benefit of using enabling risk management measures, including structures to increase resilience of properties will be similar to those set out in section 5.5.

Lifespan of the proposed development

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

Viability and enabling development

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

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

Enabling development and legal agreements

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

Key considerations

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

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

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

APPENDIX 1 – NORFOLK AND SUFFOLK COASTAL AUTHORITIES STATEMENT OF COMMON GROUND COASTAL ZONE PLANNING (SEPTEMBER 2018)

This statement of common ground is between:

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

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

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

Background

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

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

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

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

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

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

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

Shared Aims

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

Agreed Approach

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

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

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

Cllr. Ian Devereux
Cabinet member for Environment

Borough Council of Kings Lynn and West Norfolk

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

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

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

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

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

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

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

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

Melanie Vigo di Gallidoro Chairman, Planning Committee Broads Authority

Haydn Thirtle
Chair, Broads Authority

Endorsed by the Environment Agency Mark Johnson, Regional Coastal Manager

APPENDIX 2 – ORGANISATION ROLES & RESPONSIBILITIES

| Organisation | Scale | Role | Responsibilities |
|---|----------|--------------------------------------|--|
| Anglian Eastern Regional Flood and Coastal Committee | Regional | Regional Flood and Coastal Committee | Established by the EA, the AERDCC has the purposes of: - ensuring there are coherent plans for identifying, communicating and managing flood and coastal erosion risks across the catchment area and shoreline, - promoting efficient, targeted and risk based investments in flood and coastal erosion risk management that optimises value for money and benefits for local authorities, and - providing a link between risk management authorities, and other relevant bodies to engender mutual understanding of flood and coastal erosion in the Anglian Eastern region. |
| Broads Authority | Local | LPA | Prepare Local Plans and Supplementary Planning Documents, support the preparation of Neighbourhood Plans, and determine planning applications. |
| Coastal Partnership East (CPE is not an organisation but a shared team across ESC, GYBC and NNDC) | Regional | Coastal Partnership | CPE is a coastal management team comprised of the partner local authorities of ESC, GYBC and NNDC, whose role it is to carry out the permissive powers, not duties, of the local authorities as Risk Management Authorities/Coast Protection Authorities. CPE therefore as coastal LAs has permissive powers to manage the coast through constructing and consenting new coastal/erosion risk management measures, monitoring changes or repairing and maintaining existing structures. The team also work with the EA, other statutory bodies, RFCC and EACG to monitor and oversee Shoreline Management Plan policies. |
| Department for Environment, Food and Rural Affairs | National | Government Department | DEFRA provides the lead policy role for coastal erosion risk management. |
| Department for Levelling Up, Housing and Communities | National | Government Department | DLUHC provides the lead policy role in coastal erosion planning |
| East Anglian Coastal Group | Regional | Coastal Partnership | Coastal Groups are comprised principally of coastal management officers from district councils, statutory bodies and the EA, with the role of overseeing the preparation and implementation of SMPs, guiding government policy via consultation responses and sharing information and coastal management best practice at the regional and national levels. |

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

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

APPENDIX 3 – COASTAL EROSION VULNERABILITY ASSESSMENT (CEVA) TEMPLATE

Level A CEVA

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

Statement:

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

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

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

9. Signed by the applicant:

.....

10. Printed Name:

11. Date:

Level B CEVA

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

1. Name:

.....

2. Agents Name (if applicable):

.....

3. Development Location/Address:

.....

4. Development Proposal:

.....

5. Relevant Shoreline Management Plan (SMP), please tick one:

- SMP5 - Hunstanton to Kelling Hard
- SMP 6 - Kelling to Lowestoft Ness
- SMP 7 - Lowestoft Ness to Landguard Point
- SMP8 - Essex and South Suffolk

6. SMP Policy Unit covering the development frontage:

7. Risk Band, please tick as applicable:

- 20 years
- 50 years

- 100 years
 - 30m risk zone
 - 30-60m risk zone
8. Development category, please tick one:
- New residential development
 - New non-residential development
 - Temporary Buildings, caravans and land uses
 - Extension to existing development
 - Modification to existing development

Statement

Please provide detailed answers to the following:

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

21. Date:

APPENDIX 4 – CASE STUDIES

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

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| |  |
| <p>Key Details:</p> | <ul style="list-style-type: none"> • Tourism use but with community benefits including parking for church and public cycle/footpath • Designed to be rolled back as cliff erodes • Potential impact to landscape and setting of Grade I listed church • Creation of cycle and walkways • Creation of parking for the church • Reduction in holiday caravans due to earlier refusal |
| <p>Details:</p> | <p>The existing holiday caravans are very close to the cliff edge due to erosion. Earlier consent was given for smaller rollback scheme within the existing holiday park but a larger area is needed to accommodate future rollback and growth. To accommodate this the site needs to (partially) relocate to a site to southwest on the western side of the Coast Road and adjoining Stirrups Lane.</p> <p>The scheme includes public walking and cycle ways and provision of parking for the church and green spaces with landscaping.</p> <p>Consent by SCC Highways to reduce the speed limit from 60mph to 30mph to allow for safe crossing to the main site and for the safety of pedestrians and cyclist and users of the car park.</p> |



| | |
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| <p>Lessons Learned:</p> | <p>A balance needed to be found in relation to the impact on the setting of the grade I listed church and the economic benefits of the loss of a significant part of the site to coastal erosion.</p> <ul style="list-style-type: none"> • Early engagement with Historic England was needed to address earlier issues which resulted in a refused application for a larger number of vans over a larger area. • In order to address these concerns, the overall number of caravans was reduced and the boundary pulled away from the south along with an increase in green spaces and increased planting. • The church car park remained in the same location • A number of highways agencies were included (SCC Highways, NCC Highways and Highways England) at the pre-application stage. This was due to the main access being via Hopton in Norfolk the North via the A47 or from Corton (Suffolk) • The speed limit was also agreed by SCC to be reduced from 60mph to 30mph as there will be changes to the entrance and a crossing for pedestrians to access the main site along with potential increase in cyclists along the improved shared footway |
|--------------------------------|---|

Beach Road Car Park and Ramp, replacement Happisburgh, Norfolk

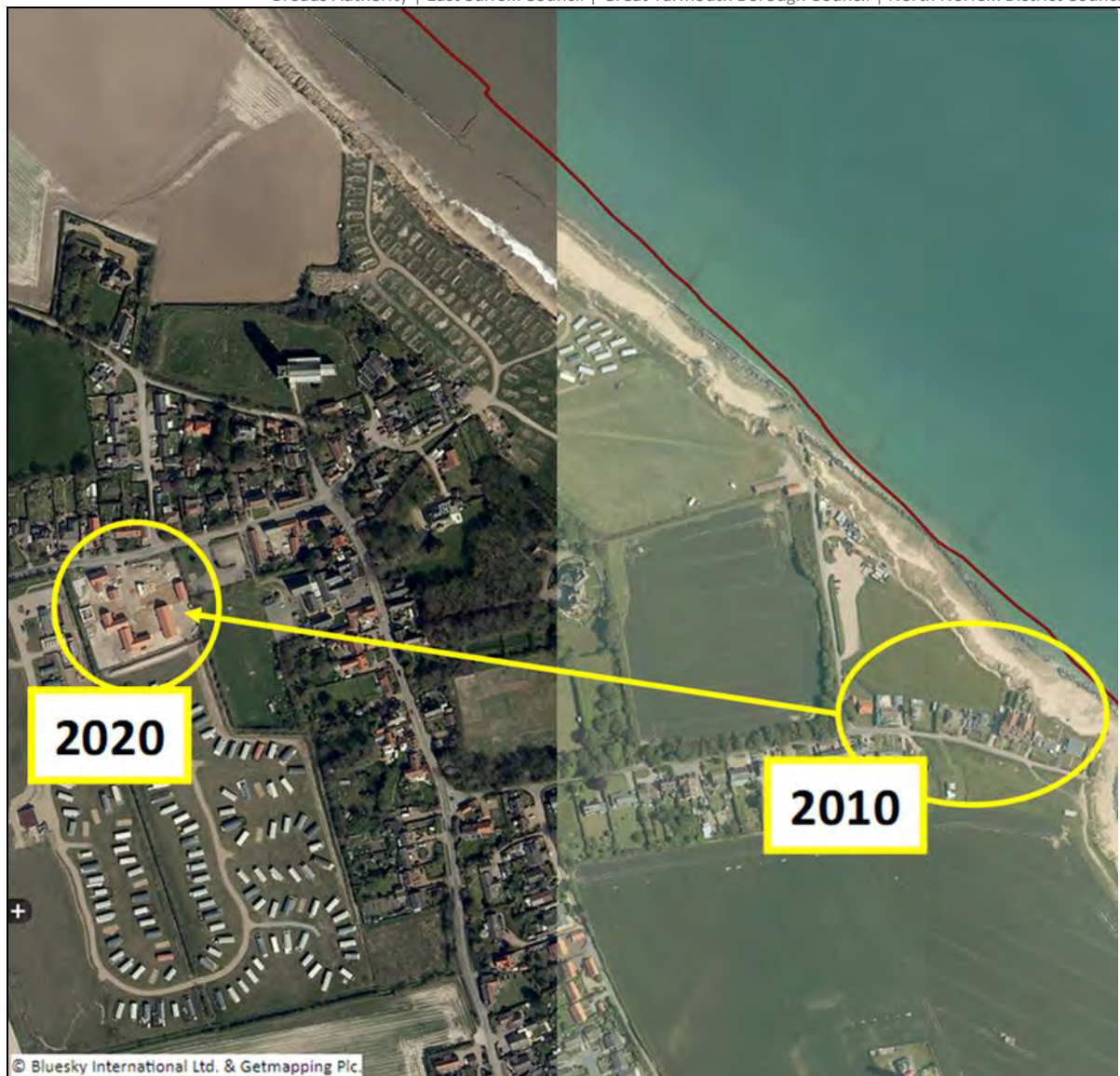
| | | | |
|---|--------------------------------|-----------------------------|---|
| Planning Number: | PF/11/0169 | Link to application: | https://idoxpa.north-norfolk.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=ZZZT68LNMS935 |
| Authority: | North Norfolk District Council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



| | |
|-------------------------|--|
| Key Details: | <ul style="list-style-type: none"> • Community car park and Beach Access Ramp • Designed to be rolled back as cliff erodes • Ramp cut into cliff, no permanent materials used • Car park materials can be moved/retreated when necessary |
| Details: | As old car park at imminent risk of erosion, new car park developed. No permanent materials used in new car park, designed to be taken up as and when it becomes necessary. Ramp cut into cliff, as ramp erodes away, new ramp is cut into cliff. |
| Lessons Learned: | The infrastructure needed to be in the risk zone, if planning in the future, consider including longer term relocated access point/rollback location for the car park site in the original application to enable this to be clear and in place when it is required in the future. |

Beach Road residential property replacement, Happisburgh, Norfolk

| | | | |
|-----------------------------|--------------------------------|-------------------|---|
| Planning Number: | PM/16/04 28 | Link: | https://idoxpa.north-norfolk.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=ZZZT68LNMS298 |
| Authority: | North Norfolk District Council | Applicant: | North Norfolk District Council |
| Date of Application: | 2016 | Keywords: | Rollback, EN12, Relocation, Residential, etc |

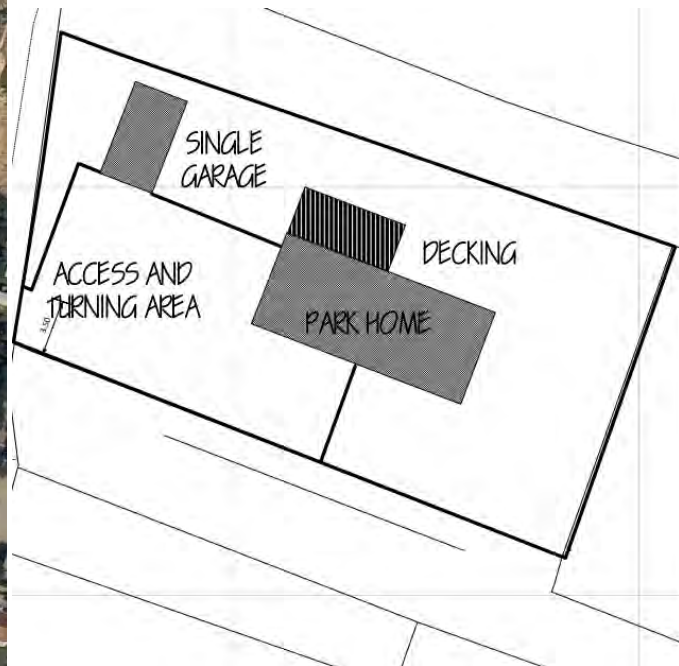
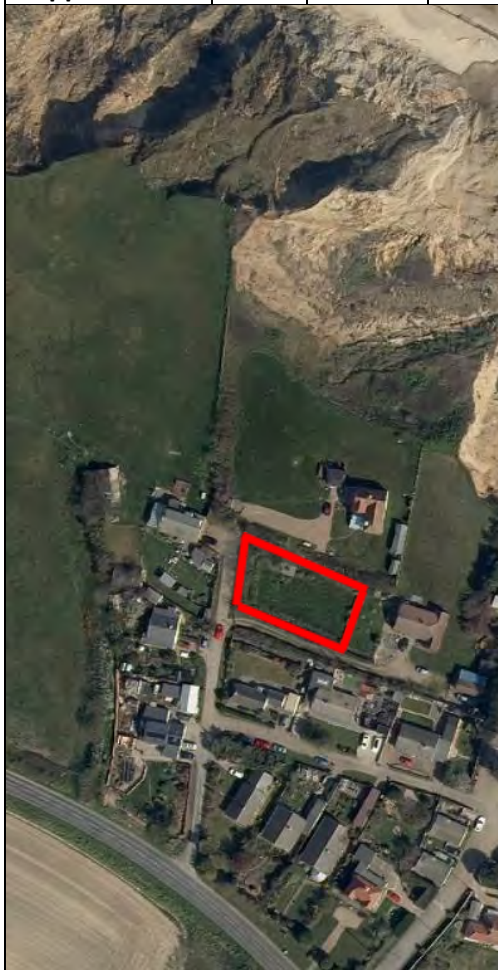


| | |
|---------------------|--|
| Key Details: | <ul style="list-style-type: none"> • Using government funding, nine properties at short-term (20 years) risk of erosion were purchased by North Norfolk District Council and demolished • Nine properties of equivalent size gained consent on land within the parish but outside the coastal risk zone. • The land remained in the ownership of a third party and a legal agreement was arranged between the applicant (NNDC) and the landowner. • The land with consent was then sold and developed independently. • NNDC recouped a third of their costs. |
| Details: | <p>Nine residential properties located within the twenty-year risk zone were purchased by North Norfolk District Council in 2011 under voluntary agreement. The rollback opportunity under local planning policy was secured by letter of agreement before the properties were demolished and the sites cleared and incorporated into wider clifftop open space. Sub-surface foundations and services were left in situ to minimise disturbance to the cliff. An assessment was completed as to where the relocated residential properties could be located. Although the policy allowed for properties to be located at other settlements within the district, it was agreed to seek to retain them within the parish from which they originated, to continue to maintain the viability of the village. Options were explored for a number of sites using viability assessments similar to one used to allocate development sites for local plans. The site was selected as preferred</p> |

| | |
|-------------------------|---|
| | <p>based on these criteria and a willing landowner. A legal agreement was established between the developer (NNDC) and the landowner to secure the rollback opportunity and commercial relationship between the two parties. A planning application was prepared and submitted. As with many local developments, there was a mixed response from the local community. These included calls for properties to be affordable homes, rather than open-market dwellings. Planning policy allows for like for like replacement and part of this trial was to understand how cost-viable such an approach would be. The land with planning consent was sold on the open market to a property developer and was subsequently constructed. This was one of the first examples of residential property relocation/rollback, with the purchase of the original properties, associated costs, documents for planning applications, legal agreement, and final profit share on the sale of the development site, approximately one third of NNDC's outlay was recouped.</p> |
| Lessons Learned: | <ul style="list-style-type: none"> • May be more effective to facilitate owners using their own EN12 opportunity. • Local Authorities are open to detailed scrutiny in commercial developments, which can be challenging where this may not always chime with wider corporate priorities and aspirations, e.g. social housing provision. • It is not an easy task to identify suitable development sites where the landowner is willing to sell or come to an arrangement. In this case the developer (NNDC) was fortunate. • Using the purchase criteria and redevelopment methodology, in this case study, is not cost neutral to the developer (NNDC). • There was significant local pressure to see at risk properties removed and residents able to relocate, however, there was less appetite for redevelopment in the local area. |

Land West of Little Marl, Trimingham, Norfolk

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



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| Key Details: | <ul style="list-style-type: none"> • Site expected to be lost to erosion in 2025-2055 epoch (epoch 2) • Applicant had historic permission to build an additional bricks-and-mortar house • Instead, applied to place a caravan and garage on the site • This was a preferable type of home, given the risk of erosion |
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| Details: | Applicant had historic permission to build two bungalows on land within Epoch 2 (indicative erosion up to 2055). One bungalow had been built in 1991, so the permission for the whole scheme remained extant. As an alternative to the second bungalow, the landowner sought permission to instead station a caravan on the land and erect a garage, due to the potential loss of land by the impact of coastal erosion. This was seen as a pragmatic approach to the threat of erosion, in line with the preference for adaptation on the coast, given that the caravan would be movable at a future date when it became at risk. After liaising with CPE colleagues, garage was reduced from double to a single non-permanent wooden garage. |
| Lessons learned | It is advantageous to be open to seek more appropriate solutions for historic live consents. |

Easton Lane Easton Bavents, Reydon, Southwold, Suffolk

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



Key Details:

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

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| Details: | <ul style="list-style-type: none"> • The properties were affected by coastal erosion and were extremely close to the cliff edge. Coastal management team was involved in the process, and this was funded by central government in relation to the pathfinder project. Demolition was considered essential. • Relocation sites were addressed within the Reydon Neighbourhood Plan, but no specific sites were allocated |
| Lessons Learned | <ul style="list-style-type: none"> • Residential needs to be considered where there are coastal problems – can be addressed within Neighbourhood Plans • Reydon Neighbourhood Plan has addressed this via paragraph 7.4 RPC <i>Action 5: Support and Protection For Property at Risk From Flooding or Erosion: In support of this Neighbourhood Plan, the Parish Council will support appropriate planning proposals as may be developed in the future for the relocation of properties at risk from erosion at Easton Bavents and any proposals made in the context of the Shoreline Management Plan to protect housing in areas vulnerable to future flooding</i> |

Land west of Copperwheat Avenue, Reydon, Suffolk

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|-----------------------------|----------------------|-------------------|--|
| Planning Number: | DC/19/1141/OUT | Link: | DC/19/1141/OUT Outline Application - Development of up to 220 dwellings with associated open space Land To The West Of Copperwheat Avenue Reydon Suffolk IP18 6YD (eastsuffolk.gov.uk) |
| Authority: | East Suffolk Council | Applicant: | WM Denny & Son Ltd and Chartwell Industries |
| Date of Application: | 15 March 2019 | Keywords: | Residential, including rollback plots |



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| Key Details: | <ul style="list-style-type: none"> Some properties at Easton Bavents had been lost to erosion, and others were/are under threat A 220-dwelling allocation (Policy WLP6.1) was made in the Waveney Local Plan for a site in Reydon Seven plots are made available for the relocation of properties under threat (or already lost) from coastal erosion |
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| <p>Details:</p> | <ul style="list-style-type: none"> • An allocation of 220 dwellings (WLP6.1) was made in the Waveney Local Plan, including seven plots for the relocation of dwellings either already lost, or under threat, from coastal erosion • The plots have been included to assist particularly with the loss of (and threatened loss of) dwellings at nearby Easton Bavents • If the plots are not taken up within five years of the rest of the development being completed, the plots will revert to affordable housing • The planning application was submitted in 2019 and a resolution to grant permission was reached at the Planning Committee in March 2020 (subject to the completion of a S106 legal agreement) • The Reydon Neighbourhood Plan (RNP) was formally ‘made’ in May 2021 and so has full weight in the decision-making process from that date. As the permission had not been issued at that point, it had to return to the Planning Committee for re-determination • One key policy in the RNP (RNP4) requires a planning condition to restrict the use of new open market housing to “principal residences” (i.e. not second or holiday homes) • The application was resolved to be granted, and the outline planning permission was issued, on 16th September 2021 |
| <p>Lessons Learned</p> | <ul style="list-style-type: none"> • The location of the site adjacent to the Suffolk Coast and Heaths AONB required some sensitive landscaping proposals • Securing the 7 rollback plots as part of the allocation (and permission) was key to assisting with tackling the effects of coastal erosion in the local area • It remains to be seen whether the plots will be taken up by those who have lost (or will lose) their properties to erosion, but they have the opportunity • The principle having been achieved, it is conceivable that future Local Plans could repeat this process on other sites |

Seamarge Hotel, Overstrand, Norfolk

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| Planning Number: | PF/21/23 77 | Link to application n: | https://idoxpa.north-norfolk.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=QYTB32LNJUB00 |
| Authority: | North Norfolk District Council | Applicant: | Seamarge Hotel |
| Date of Application n: | 2021 | Keywords : | Adaptation, Epoch 2, Hotel |



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| Key Details: | <ul style="list-style-type: none"> • Historic permission for two storey bricks-and-mortar extension to rear of hotel • Hotel is in Epoch 2 area (indicative erosion up to 2055) • Applied for permission to site seven movable lodges in grounds instead of historic permission • This was seen as a pragmatic approach to the risk of coastal erosion and in line with an adaptation approach |
| Details: | <p>The hotel sits within Epoch 2 (indicative erosion up to 2055). Applicant already had planning permission to build a two storey bricks-and-mortar extension to the rear. Instead, applied for permission to place seven movable lodges in the grounds. This was seen as a preferable approach, due to the risk of coastal erosion; with the limited lifespan of the extension, it would not have been economically viable to build it. However, unlike a bricks-and-mortar extension, the lodges could be moved at the</p> |

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| | appropriate time. This approach was welcomed as pragmatic, in line with a move towards adaptation. |
| Lessons Learnt | Flexibility necessary to accommodate business needs and deliver practical solution to historic permission. |

Wood Hill Holiday Park, East Runton, Norfolk

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| Planning Number: | PF/22/03 51 | Link to planning application: | https://idoxpa.north-norfolk.gov.uk/online-applications/applicationDetails.do?keyVal=R739MZLN03O00&activeTab=summary |
| Authority: | North Norfolk District Council | Applicant: | Wood Hill Holiday Park |
| Date of Application: | 2022 | Keywords: | Rollback, EN12, Enabling Development |



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| Key Details: | <ul style="list-style-type: none"> Hybrid rollback application, with some caravans being moved to the landward side of coastal site, and others being moved inland to a second site. Well-researched supporting documents, including Coastal Erosion Vulnerability Assessment and Flood Risk and Drainage Assessment. Enabling Development was used as part of this application. |
| Details: | <p>The applicant's aim was to rollback the caravans and other facilities out of the 2105 epoch over three stages, beginning in 2022 and ending in 2055. This was to be done in two ways. Firstly, some caravans would be moved to the most landward edge of the site, into land which is currently used for touring plots. Secondly, some caravans would be moved to another site, Kelling Heath, several miles away. In total, the number of caravans in the site closest to the cliff would reduce from 64 to 40, with none of these</p> |

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| | <p>being in the indicative erosion epochs (up to 2105) by the end of phase 3. This application showed considerable forward planning, considering impacts such as water run-off, landscape</p> <p>The applicant's consultants approached CPE beforehand to discuss the wider proposal, including how to remove redundant infrastructure. Several well-researched supporting documents were provided as part of the application, including, but not limited to, a Coastal Erosion Vulnerability Assessment and a Flood Risk and Drainage Assessment. The CEVA identifies coastal erosion risks and how the proposed scheme will seek to mitigate these.</p> <p>Total number of caravans increased from 64 on the site at Wood Hill to 40 on the Wood Hill site and 40 at Kelling Heath in order to ensure development was financially viable.</p> <p>The only question that arose in this application was whether the Kelling Heath part of the rollback conformed to Policy EN12, which requires the new development to be in a location which is well related to the community from which it was displaced.</p> |
| Lessons learned | <ul style="list-style-type: none"> • Good use of assessment of coastal risk developed and utilised • Some enabling development • Long term considered planning with early engagement with the coastal and planning teams developed a high quality and well considered proposal. • Monitoring and future removal of below ground infrastructure included. |

Manor Caravan Park, Happisburgh, Norfolk

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|-----------------------------|--------------------------------|-------------------|---|
| Planning Number: | PF/14/0120 | Link: | PF/14/0120 Formation of caravan park to provide pitches for 134 static caravans, 60 touring caravans and camping area with office/warden accommodation and amenity building Land South Of North Walsham Road Happisburgh (north-norfolk.gov.uk) |
| Authority: | North Norfolk District Council | Applicant: | |
| Date of Application: | 2014 | Keywords: | Rollback, Caravan Park, etc |

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| <p>Key Details:</p> | <ul style="list-style-type: none"> - Caravan Park in short term risk zone. - As part of Pathfinder, North Norfolk District Council liaised with the caravan park to help them find a suitable site for the caravan to move to. - After caravans and infrastructure was removed, site was used as cliff-top grassland, providing buffer between village and sea. |

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| <p>Details:</p> | <p>Manor Caravan Park was primarily within the 2025 indicative coastal risk zone (epoch 1) of the shoreline management plan (SMP). Over a number of years, a significant number of static holiday home plots and land had been lost. A temporary consent had been granted to move the most at risk holiday homes onto an adjacent touring area. The holiday park had been identified by the local community as a key asset for the economic vibrancy of the village, with visitors supporting the local public house, shop, post office, etc. As such, NNDC's liaison with the village confirmed there was a desire to ensure the holiday park remained well-connected with the existing village and facilities. North Norfolk District Council provided a business grant to Manor Farm Holiday Park to investigate options to relocate away from the coastal erosion risk zone. These funds were used to complete a site viability assessment including if they may be available. This included landscape visibility assessment as the core part of the village is a conservation area and has a number of listed buildings. Park owner used this information to identify preferred site by which a private agreement was agreed with the landowner, prior to the submission and application. Although the wider community had expressed a desire for the holiday park to remain in a close association with the village, there were a number of objections to the proposed position of the new site. The planning committee refused the application based on the landscape impacts. On appeal by the applicant the application was approved. The new site was prepared and all assets associated with the holiday park were moved. The original cliff-top site was cleared and remains open cliff-top grassland, providing a buffer between the village and the sea. The site is no longer traditional cliff-top park, with regular rows of holiday homes, it has more landscaped layout including hedges, planting to improve biodiversity and visual appearance.</p> |
| <p>Key Learning:</p> | <ul style="list-style-type: none"> - Even with significant pre-application work, it does not guarantee a smooth ride with the decision making process. - There are challenges across competing constraints and needs when it comes to relocation and reprovision of assets at risk of coastal erosion. - Where there are perceived landscaping impacts, balance needs to be struck with local economic and community needs and the balance of landscape improvements with asset removal from the coast must be considered. - Where there is a need and a desire, it is possible to relocate whole businesses to make them sustainable and to reduce erosion risk into the future. |

APPENDIX 5 – EXAMPLE MODEL CONDITIONS

Temporary Planning Permission

Condition: The use hereby permitted shall be discontinued on or before [].

Reason: Coastal erosion is predicted to affect the site within a period of [] years and to allow the Local Planning Authority the opportunity to reassess the suitability of the use with regard to the progress of cliff erosion.

Condition: The development hereby permitted shall be for a maximum period of [] years from the date of this permission, after which time the structure shall be removed and the land reinstated to its former condition to the satisfaction of the Local Planning Authority.

Reason: Having regard to the non-permanent nature of the structure and predicted shoreline position as a result of ongoing coastal erosion.

Condition: The use hereby permitted shall be carried out only by [] and shall be for a limited period being the period of [] years from the date of this permission, or the period during which the premises are occupied by [] whichever is the shorter.

Reason: Having regard to the special circumstances put forward by the applicant and predicted shoreline position as a result of ongoing cliff erosion.

Condition: On [] the use hereby permitted shall be discontinued and the land shall be reinstated to its former condition to the satisfaction of the Local Planning Authority at or before this date.

Reason: Having regard to the progress of cliff erosion, risks to people associated with falling debris and appearance of the locality.

Surface Water Drainage

Condition: Details of surface water drainage, in connection with the development hereby approved, shall be submitted to, and approved by, the Local Planning Authority before any works on the site commences. The drainage works shall be constructed in accordance with the approved plans.

Reason: To ensure satisfactory drainage of the site and prevent cliff destabilisation.

Relocated Dwellings

Condition: The proposed dwelling shall contain a floor space not exceeding the floor space of the dwelling being replaced ([] square metres).

Reason: To ensure that the new dwelling provides a like-for-like replacement to meet the needs of the current occupants and in accordance with Policy [].

Condition: The proposed dwelling shall contain a floor area not exceeding the floor area of the dwelling being replaced ([] square metres) plus any permitted development allowance (at an allowance permitted on the date that the planning application was submitted) that has not already been used by the original dwelling.

Reason: To ensure that the new dwelling provides a replacement dwelling to meet the needs of the current occupants and in accordance with Policy [].

Condition: Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (Amendment) (No. 2) (England) Order 2008 no building or structure permitted by Classes A (extensions or alterations), B (changes to the roof) or E (buildings or enclosures within the curtilage of the house) of Schedule 2 Part 1 of the Order shall be erected without the submission of a formal planning application and the granting of planning permission by the Local Planning Authority.

Reason: To prevent further increases in the size of replacement dwelling in the countryside and to secure a properly planned development.

Condition: First occupation of the relocated dwelling shall be limited to the person/s displaced from their original property by coastal erosion and shall not be for the benefit of any other person whatsoever.

Reason: The site is in an area where dwellings would not normally be permitted unless special circumstances have been demonstrated which would justify applying the exception policy [].

Change of Use

Condition: The [building/land] shall be used only for [] and for no other purpose whatsoever, (including any other purpose in Class [] of the Schedule to the Town and Country Planning (Use Classes) Order 2005) or in any provision equivalent to that Class in a statutory instrument revoking and re-enacting that Order with or without modification.

Reason: To retain control of the type of development that will be permitted in areas at risk of coastal erosion and enable consideration as to whether other uses in the Use Class would be satisfactory in this area.

APPENDIX 6 – NEIGHBOURHOOD PLAN GUIDANCE

The purpose of this guidance is to support communities seeking to address coastal planning matters within a Neighbourhood Plan. Community groups considering undertaking a neighbourhood plan are encouraged to engage with their local planning authority to discuss planning related issues and potential ways in which a neighbourhood plan could help to resolve such issues. The following sources provide guidance and information about Neighbourhood Planning more broadly:

- National Planning Practice Guidance for Neighbourhood Planning³⁹
- Locality guidance for neighbourhood planning⁴⁰
- Local Planning Authority guidance (East Suffolk Council⁴¹, Great Yarmouth Borough Council⁴², North Norfolk District Council⁴³, and The Broads⁴⁴)

Neighbourhood plans are important planning documents that local community groups can prepare for their local areas (usually a parish). Neighbourhood plans can address, and write policies concerning a wide range of planning matters important to the community. Once 'made' (adopted), neighbourhood plans become part of the development plan and sit alongside the relevant Local Plan/s, receiving statutory status in the determination of planning applications.

Neighbourhood Plans must:

- Create policies that address the (re)development of land;
- Create policies that would be in general conformity with the strategic policies of the relevant Local Plan;
- Create policies that would be within their neighbourhood area. In the context of coastal planning, the terrestrial and marine planning regimes meet and overlap between the mean low and high water spring tides;

The Local Plans contain strategic planning policies that address coastal planning matters, including relocation and rollback. If considering preparing coastal planning policies, it is important that community groups fully consider and understand the content of such Local Plan policies, avoid duplication and add value to these policies; the relevant Local Authority can advise on this. Within the above framework, Neighbourhood Plans can potentially consider coastal planning matters in a number of ways, including the following:

³⁹ <https://www.gov.uk/guidance/neighbourhood-planning--2>

⁴⁰ <https://neighbourhoodplanning.org/>

⁴¹ <https://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/>

⁴² <https://www.great-yarmouth.gov.uk/neighbourhood-planning>

⁴³ <https://www.north-norfolk.gov.uk/tasks/planning-policy/neighbourhood-planning/>

⁴⁴ <https://www.broads-authority.gov.uk/planning/planning-policies/neighbourhood-planning>

- Allocate land for (re)development in less vulnerable locations, providing plots to residents and businesses at greatest risk (for guidance on rollback and relocation, see chapter 5 of this SPD). If such plots were developed as self or custom build dwellings, they would benefit from Community Infrastructure Levy (CIL) exemption where applicable, which would support the viability of relocation.
- Allocate land for (re)development in less vulnerable locations to help fund the introduction and maintenance of coastal risk management structures.
- Develop a vision, derived from community engagement, to help identify opportunities for activities on the coast (within the CCMA). The vision could help to identify and support changes of use to uses less vulnerable to coastal change, potentially including both temporary and permanent development opportunities on the coast.

The implementation of coastal planning policies, such as rollback and relocation, can require significant funds, especially where demolition is required.

APPENDIX 7 – GLOSSARY

A

Area of Outstanding Natural Beauty

Land protected by the Countryside and Rights of Way Act 2000 to conserve and enhance its natural beauty.

Article 4 direction

A direction relating to Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 requiring specified development that would ordinarily be permitted development to achieve planning permission.

C

Coastal adaptation

The process of managing the negative impacts of coastal change, in a way that makes individuals, communities or systems better suited to their environment.

Coastal Change Management Area

An area identified in plans (usually the Local Plan) as likely to be affected by physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion.

Coastal erosion

An effect of natural coastal processes whereby material is eroded from cliff/beach.

Coastal processes

Natural coastal processes driven by geology, tides, weather and climate change.

Conservation area

Land protected by the Planning (Listed Buildings and Conservation Areas) Act 1990 to preserve or enhance the character and appearance of its special architectural or historic interest.

Climate change

Changes to the climate as a result of human activities, most commonly associated with the unsustainable burning of fossil fuels.

D

Development plan

The collection of land use documents (e.g. Local Plans, Neighbourhood Plans) that planning applications must be accorded with unless material considerations indicate otherwise.

E

Enabling development

Development contrary to planning policy, but which would secure a particular public benefit/s that

would warrant departing from policy. It usually concerns development that would financially support development which would otherwise be unviable.

Erosion risk areas

Areas identified in a SMP as likely to be at risk from coastal erosion and flooding in the short (0-20 years), medium (20-50 years) and long (50-100 years) term, which form the evidence base for the CCMA.

Exception site

An area of land on which certain types of development (as specified in a land use plan e.g. Local Plan or Neighbourhood Plan) could be granted as an exception to the standard approach to development on such land.

H

Heritage asset

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

Highway authority

An organisation responsible for public roads, as set out in the Highways Act (as amended) 1980.

I

Integrated Coastal Zone Management

A dynamic, multidisciplinary, holistic and iterative process to promote sustainable management of the coast.

L

Local development order

A land use plan prepared by the local planning authority that grants planning permission to development specified in the local development order.

Local plan

A land use plan prepared by the local planning authority containing planning policies against which planning applications are determined.

Local planning authority

The public authority whose duty it is to carry out specific planning functions (e.g. prepare the local plan, determine planning applications) for a particular area.

Listed building

A building identified for its special architectural or historic interest.

M

Marine plan

A plan prepared by a marine plan authority that sets policies for and in connection with the sustainable development of the relevant marine plan area.

N

Neighbourhood development order

A land use plan prepared by a local community group that grants planning permission to development specified in the neighbourhood development order.

Neighbourhood plan

A land use plan prepared by a local community group containing planning policies against which planning applications are determined.

P

Planning history

The collection of historic planning permissions and/or enforcement action on an area of land.

R

Relocation

The relocation of development from a site at risk from coastal change to a site of much lesser risk. Similar to 'relocation'.

Risk management structure

Structures designed to reduce the impact of coastal processes on an area along the coast.

Rollback

The movement of development from a site at risk from coastal change to a site of much lesser risk, usually in relatively close proximity to the previous site. Similar to 'relocation'.

S

Section 106 agreement

A legal agreement requiring specified planning obligations to mitigate the impacts of development, entered into under section 106 of the Town and Country Planning Act 1990.

Shoreline Management Plan (SMP)

A strategy for managing flood and erosion risk for a particular stretch of coast, over short, medium and long-term periods.

Sound

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

Special Area of Conservation

An area of land designated under the Conservation of Habitat and Species Regulations 2017 (as amended) for its contribution to conserving habitats and species.

Special Protection Area

An area of land designated under the Conservation of Habitats and Species Regulations 2017 (as amended) for its contribution to conserving birds.

Supplementary planning document (SPD)

A document that adds further detail to the policies in the development plan and operates as a material consideration in the determination of planning applications.

T

The Partnership

The group of organisations preparing the draft Coastal Adaptation SPD (East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority, and the shared Coastal Partnership East team).

Planning Committee

11 November 2022

Agenda item number 10

East Suffolk Council Walking and Cycling Strategy

Report by Planning Policy Officer

Summary

East Suffolk Council has produced a Walking and Cycling Strategy that includes part of the Broads area. It is a useful strategy which the Authority can use in its role relating to access as well as in planning.

Recommendation

It is recommended that Planning Committee endorse the East Suffolk Council Walking and Cycling Strategy.

1. Introduction

- 1.1. The East Suffolk Cycling and Walking Strategy has been produced by East Suffolk Council over the last few years, with the Broads Authority involved at officer level to help inform the Strategy.
- 1.2. The purpose of the East Suffolk Cycling and Walking Strategy (the Strategy) is to create safe, coherent, direct, comfortable and attractive cycling, walking and wheeling environments that lead to improvements in health and wellbeing, facilitate greater social interaction and play, encourage more environmentally sustainable lifestyles, reduce road congestion, and support economic growth. In order to create these environments, the Strategy identifies cycling and walking infrastructure recommendations across the East Suffolk district (including that part of the district which is in the Broads Authority Area), focussing on the identification of new and improved infrastructure rather than the maintenance of existing infrastructure. It also provides context and information to support detailed infrastructure proposals and inform plan and decision making to support cycling, walking, and equestrian use.
- 1.3. The Strategy was adopted by East Suffolk Council in October 2022 and can be found here: [East Suffolk Cycling and Walking Strategy 2022 \(arcgis.com\)](https://arcgis.com)
- 1.4. As the Strategy covers the area of East Suffolk Council that includes the Broads, it seems prudent for the Broads Authority to endorse the study so we can use it in our access role but also, as relevant, in planning. Therefore, it is recommended that Planning Committee endorse the strategy as evidence for the Local Plan.

Author: Natalie Beal

Date of report: 24 October 2022

Planning Committee

11 November 2022

Agenda item number 11

Consultation responses

Report by Planning Policy Officer

Summary

This report informs the Committee of the officer's proposed response to planning policy consultations received recently, and invites members' comments and guidance.

Recommendation

To note the report and endorse the nature of the proposed response.

1. Introduction

- 1.1. Appendix 1 shows selected planning policy consultation documents received by the Authority since the last Planning Committee meeting, together with the officer's proposed response.
- 1.2. The Committee's comments, guidance and endorsement are invited.

Author: Natalie Beal

Date of report: 27 October 2022

Appendix 1 – Planning Policy consultations received

Appendix 1 – Planning Policy consultations received

Norfolk County Council

Document: [Pre-submission Norfolk Minerals and Waste Local Plan \(PDF | \[norfolk.gov.uk\]\(http://norfolk.gov.uk\)\)](#)

Due date: 11 November 2022

Status: Pre-submission

Proposed level: Planning Committee endorsed

Notes

The letter from Norfolk County Council accompanying the consultation states:

“We are preparing a Norfolk Minerals and Waste Local Plan Review, to consolidate the three [adopted DPDs](#) into one Local Plan, ensure that the policies within them remain up-to-date and to extend the plan period to the end of 2038.

The national Planning Practice Guidance states that most local plans are likely to require updating in whole or in part at least every five years. The requirement for a planned five-yearly review was incorporated into the adopted Minerals and Waste Core Strategy.

The current adopted plan period is up to the end of 2026; the review will extend this plan period up to the end of 2038 to ensure consistency with the other plans being developed by the Local Planning Authorities in Norfolk.

Once adopted, the Norfolk Minerals and Waste Local Plan Review will contain the policies used to determine planning applications for mineral extraction and associated development and waste management facilities in Norfolk.”

Proposed response

Summary of response

There are some concerns about two sites that are allocated as well as some other concerns relating to light pollution, the setting of assets and the Broads as well as identifying some areas that need to be more internally consistent.

Main issues

Policy MW1 Development Management Criteria

- It is good that light pollution is mentioned in terms of amenity, but situations could arise where a site is isolated and there would be no impacts on amenity, but light pollution could be caused. The policy needs to consider the impact of light pollution in all instances – on people, landscape, dark skies, wildlife. The current wording is narrow in scope - only impact on people (amenity). Addressing light pollution is not necessarily about not having lighting, but a good design, doing what is needed at the right intensity and for as long as needed. Particularly in or near the Broads which have intrinsically dark skies. Another criterion needs to be added that specifically talks about light pollution. Para 6.12 is very

good, but that is not policy. And the policy it links to, as worded, means that schemes that have external lighting that does not cause amenity issues fall through the gap. Noting our comments on para 6.16 (below), lighting needs to be fully justified as well.

- MW1 part i – to be consistent with the NPPF, this criterion needs to mention the impact on the setting of these assets as well as on the assets themselves.
- Paragraph 6.16 – bullet point on lighting – needs to say more – it is about justifying the need for light in the first place, designing light so it is shielded and pointing down, of the right intensity for the job and only on when needed. This paragraph is a good start, but does not go far enough and as per the comments earlier, Policy MW1 needs to be wider than the impact of light on amenity.

Policy WP2 Spatial Strategy for waste management facilities – STRATEGIC POLICY

- This policy says ‘New or enhanced waste management facilities should be located within five miles of one of Norfolk’s urban areas or three miles of one of the main towns and be accessible via appropriate transport infrastructure, subject to the proposed development not being located within: the Broads Authority Executive Area or the Norfolk Coast Area of Outstanding Natural Beauty, other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest’. (my emphasis)
- Elsewhere, throughout the document, the stance is no minerals and waste sites within the Broads, yet this policy says they could be.
- A look at the maps suggests that there are no settlements that need a facility within the AONB or Executive Area to achieve the 3 miles/5 miles criteria; as such, why is this criterion needed?
- If this part of the policy is to be kept in, we request there is reference to the need for close working with the Broads Authority.
- We also request that any proposals would need to demonstrate no alternative sites are available.

WP16 Design of waste management facilities

- Uses the word ‘should’. This is a weak term and all other policies before use the term ‘will’ – why is this wording used in this policy and why is it different to other policies?
- Does WP16 repeat MW1? If they are both needed, then WP16 needs to refer to impact on the Broads and AONB and their setting.
- Should it cross refer to MW1 like lots of other policies do?

MP5 Core River Valleys

- This policy does not mention impact on the Broads or its setting and does not cross refer to MW1 like other policies do.
- For consistency, this policy needs to refer to the Broads and/or cross refer to MW1.

MP10 Safeguarding of port and rail facilities, and facilities for the manufacture of concrete, asphalt and recycled materials – STRATEGIC POLICY

- This policy uses the term ‘should’ in relation to the submission of a Minerals Infrastructure Impact Assessment. The rest of the policy uses ‘will’ for example. It seems that this assessment is essential, but the policy using the term ‘should’ implies it is not. Why is there difference in wording in this policy when compared to others?

Min 65 land north of Stanninghall Quarry

- It is noted that this site has planning permission and the plan may not include this policy if the scheme has started.
- The site could potentially have adverse effects on the Broads and setting of the Broads in terms of scale, and proximity in relation to the numbers of visitors to attractions and facilities in Horstead/Coltishall area – this needs to be addressed by the LVIA.
- The Site Characteristics para states *could be extracted within 13 years*. It is not entirely clear whether this refers to the proposed site only or the proposed plus existing sites. Clarification is required as the timescale clearly influences the duration of effects.
- M65.6 Landscape states: *it should be possible to design a scheme of working, incorporating screening*. However, the plan does not show any screening (only areas of Buffer). Some of the northern and eastern boundaries may require screening as mitigation for adverse visual effects if identified by LVIA.
- On Google Maps there is a photograph apparently showing some plant of significant size at the existing Tarmac Stanninghall Quarry. The Plan text does not indicate anything of this scale/height although Policy MIN 65 (j) refers to use of existing processing plant at the proposed site. This is somewhat concerning. However, the Specific Site Allocation Policy MIN 65 includes a requirement for submission of an LVIA with any planning application. If larger scale plant is moved to the proposed site, that any LVIA would need to assess the effects of this on the Broads area.

Min 25 land at Manor Farm (between Loddon Road and Thorpe Road), Haddiscoe

- This is immediately adjacent to the Broads Authority boundary
- Landscape impact concerns are as follows:
 - Proximity and landscape sensitivity mean that there would be potential for adverse effects on the Broads and setting.
 - Visual: processing plant – topography could enable this to be more visible. Possible lighting associated with plant and operation would exacerbate visual effects. Bunding during the extraction phases could also cause visual intrusion.
 - Footpath to NE across marshes - users are sensitive receptors. There may also be views from northern valley side above Blunderston/Flixton to Herringfleet Marshes.
 - Noise from plant and lorry movements.
 - Dust from extraction operations.
 - Additional lorry traffic on local roads in BA area.

- Policy MIN 25 (b) refers to the submission of an acceptable Landscape and Visual Impact Assessment. However, it doesn't include the Broads. The assessment of impacts on the Broads needs to be included as an aim of the study.
- Heritage concerns are as follows:
 - The proposed site here is immediately adjacent to the BA Executive Area boundary and I would suggest that there is the potential for harm to the setting of listed buildings, in particular, the White House, which is positioned to the north-east of the site.
 - In its assessment the document appears to assess the impact on heritage assets largely in terms of potential views of the mineral extraction site.
 - However, I would suggest that the definition of 'setting' is somewhat wider than that, with the NPPF glossary definition stating it is 'the surroundings in which a heritage asset is experienced'.
 - *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* guidance by Historic England goes on to state (p2): 'The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors, such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places'.
 - As such, I would suggest that the potential for detrimental impact on designated heritage assets is greater than implied in the policy.
 - I would suggest that there is some acknowledgement in M25.4 to the impact on the setting of the listed buildings being more than visual and in the last sentence it should say that it may be necessary to require measures to reduce the potential impacts on the setting of issues such as noise, dust and vibration, as well as providing the screening etc referred to, to reduce visual impacts

Queries

- **3.12** – could the navigable waterways of the Broads be used for the transport of such freight?
- **MW2** - should this refer to how staff travel to and from the site as a place of work?
- **MW2** – should this refer to the potential to use clean fuel/net zero emissions fuel for the HGVs or other work vehicles?
- **MW3** - Where a site will be in place for a number of years, would resilience to the effects of climate change be sensible to consider?
- **WP9** – aren't anaerobic digesters an in-scope type of development in terms of impact on nutrient enrichment and therefore nutrient neutrality?
- **Policy WP13 and paragraph 13.5** - Some of the wording in 13.5 is not included in WP13. In particular, there is no mention in the policy of the need to mitigate the potential rapid release of leachate or emissions and odours. This is mentioned in 13.5 but not in the policy. This may be covered to some extent in MW1, but as it is raised specifically in 13.5, does it need to be a consideration for schemes captured by WP13?

- **WP15.6** – how does the likely requirement for all WRCs to be at best available technology by 2030 relate to what is written here?
- **MP7** – could the restoration be a walk or cycle route itself – as in, not necessarily connected to the PROW? Could it become an attraction itself?
- **MP7** – what about access to water, if a body of water becomes part of the scheme?
- Given the recent announcement from Government in relation to **fracking**, is that something that the minerals and waste local plan needs to address? Would applications for such sites come to the County or the Local Planning Authority? That being said, the new Prime Minister, Rishi Sunak, has indicated changing stance again to banning fracking unless scientifically proven to not cause issues Does the Minerals and Waste Local Plan need to set out a policy position on fracking, in the interests of clarity?
- Could the situation arise whereby **peat** is excavated, not as a produce to sell, but to access a minerals site or to develop a waste site? Peat has many qualities. We have a policy that seeks the reduction of peat excavated as part of a scheme and its appropriate assessment/'disposal' to address these qualities and prevent it from becoming a carbon source. Should the Minerals and Waste plan have something similar? (See DM10, page 49 [Local-Plan-for-the-Broads.pdf \(broads-authority.gov.uk\)](#)).
- Appendix 2 – I am not sure what these are. Are you saying that these policies in another document will still be in place? They have not been reviewed, but left as is? So this Local Plan is additional to these policies? Where are these saved policies? This is not clear and might need explaining better. For example, I searched the document for 'Appendix 2' and the only two occurrences are the title of Appendix 2 and the contents page.

Typos/grammar/format

- Para after 6.30 could do with a para number
- Map 4 – may not matter, but the urban areas are blue and the main towns are blue and the shades are not very different so it is not easy to tell which blue is which.
- MP6, as worded, is quite complicated... in the same sentence, the policy talks about making something unacceptable, acceptable... I understand what is trying to be said here, but I wonder if the wording is clear?
- MP7.5 – grammar - strategy for maintaining biodiversity

Factual issues

- 1.2 – rather than 'lodged with district councils' say 'lodged with Norfolk Local Planning Authorities' – as written, it excludes the Broads Authority.
- 6.19 – again by only mentioning district and borough local plans, you don't include the Broads Authority's Local Plan. Say Norfolk LPA Local Plans.

Planning Committee

11 November 2022

Agenda item number 12

Circular 28/83 Publication by Local Authorities of information about the handling of planning applications Q3 (1 July to 30 September 2022)

Report by Planning Technical Support Officer

Summary

This report sets out the development control statistics for the quarter ending September 2022.

Recommendation

To note the report.

1. Development control statistics

1.1. The development control statistics for the quarter ending are summarised in the tables below.

Table 1

Number of applications

| Category | Number of applications |
|--|------------------------|
| Total number of applications determined | 48 |
| Number of delegated decisions | 47 |
| Numbers granted | 43 |
| Number refused | 5 |
| Number of Enforcement Notices | 0 |
| Consultations received from Neighbouring Authorities | 21 |

Table 2

Speed of decision

| Speed of decision | Number | Percentage of applications |
|--------------------------------------|--------|----------------------------|
| Under 8 weeks | 30 | 62.5 |
| 8-13 weeks | 1 | 2.1 |
| 13-16 weeks | 0 | 0.0 |
| 16-26 weeks | 0 | 0.0 |
| 26-52 weeks | 0 | 0.0 |
| Over 52 weeks | 1 | 2.1 |
| Within agreed extension ¹ | 15 | 31.2 |
| Outside of agreed extension | 1 | 2.1 |

- 1.2. Extensions of time were agreed for sixteen applications. Twelve of these were required because further information was awaited, amendments had been made to the scheme, there had been other discussions which had taken it over time or because a re-consultation was underway. One was due to the applications being taken to Planning Committee, and the remaining three were at the request of the case officer.

Table 3

National performance indicators: BV 109 The percentage of planning applications determined in line with development control targets to determine planning applications.

| National target | Actual |
|---|--------|
| 60% of Major applications ¹ in 13 weeks (or within agreed extension of time) | 100% |
| 65% of Minor applications ² in 8 weeks (or within agreed extension of time) | 100% |
| 80% of other applications ³ in 8 weeks (or within agreed extension of time) | 94% |

Author: Thomas Carter

Date of report: 28 October 2022

Appendix 1 – PS1 returns

Appendix 2 – PS2 returns

¹ Majors refers to any application for development where the site area is over 1000m²

² Minor refers to any application for development where the site area is under 1000m² (not including Household/ Listed Buildings/Changes of Use etc.)

³ Other refers to all other applications types

Appendix 1 – PS1 returns

| Measure | Description | Number of applications |
|---------|--|------------------------|
| 1.1 | On hand at beginning of quarter | 49 |
| 1.2 | Received during quarter | 49 |
| 1.3 | Withdrawn, called in or turned away during quarter | 7 |
| 1.4 | On hand at end of quarter | 43 |
| 2. | Number of planning applications determined during quarter | 48 |
| 3. | Number of delegated decisions | 47 |
| 4. | Number of statutory Environmental Statements received with planning applications | 0 |
| 5.1 | Number of deemed permissions granted by the authority under regulation 3 of the Town and Country Planning General Regulations 1992 | 0 |
| 5.2 | Number of deemed permissions granted by the authority under regulation 4 of the Town and Country Planning General Regulations 1992 | 0 |
| 6.1 | Number of determinations applications received | 0 |
| 6.2 | Number of decisions taken to intervene on determinations applications | 0 |
| 7.1 | Number of enforcement notices issued | 0 |
| 7.2 | Number of stop notices served | 0 |
| 7.3 | Number of temporary stop notices served | 0 |
| 7.4 | Number of planning contravention notices served | 2 |
| 7.5 | Number of breach of conditions notices served | 0 |
| 7.6 | Number of enforcement injunctions granted by High Court or County Court | 0 |
| 7.7 | Number of injunctive applications raised by High Court or County Court | 0 |

Appendix 2 – PS2 returns

Table 1

Major applications

| Application type | Total | Granted | Refused | 8 weeks or less | More than 8 and up to 13 weeks | More than 13 and up to 16 weeks | More than 16 and up to 26 weeks | More than 26 and up to 52 weeks | More than 52 weeks | Within agreed extension of time |
|--|----------|----------|----------|-----------------|--------------------------------|---------------------------------|---------------------------------|---------------------------------|--------------------|---------------------------------|
| Dwellings | 1 | 1 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 |
| Offices/ Light Industry | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Heavy Industry/Storage/Warehousing | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Retail Distribution and Servicing | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Gypsy and Traveller Sites | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| All Other Large-Scale Major Developments | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total major applications | 1 | 1 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 |

Table 2

Minor applications

| Application type | Total | Granted | Refused | 8 weeks or less | More than 8 and up to 13 weeks | More than 13 and up to 16 weeks | More than 16 and up to 26 weeks | More than 26 and up to 52 weeks | More than 52 weeks | Within agreed extension of time |
|--------------------------------------|-----------|-----------|----------|-----------------|--------------------------------|---------------------------------|---------------------------------|---------------------------------|--------------------|---------------------------------|
| Dwellings | 3 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3 |
| Offices/Light Industry | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| General Industry/Storage/Warehousing | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Retail Distribution and Servicing | 2 | 2 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 |
| Gypsy and Traveller Sites | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| All Other Minor Developments | 9 | 9 | 0 | 5 | 0 | 0 | 0 | 0 | 0 | 4 |
| Minor applications total | 14 | 14 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 7 |

Table 3

Other applications

| Application type | Total | Granted | Refused | 8 weeks or less | More than 8 and up to 13 weeks | More than 13 and up to 16 weeks | More than 16 and up to 26 weeks | More than 26 and up to 52 weeks | More than 52 weeks | Within agreed extension of time |
|---|-----------|-----------|----------|-----------------|--------------------------------|---------------------------------|---------------------------------|---------------------------------|--------------------|---------------------------------|
| Minerals | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Change of Use | 2 | 1 | 1 | 1 | 0 | 0 | 0 | 0 | 0 | 1 |
| Householder Developments | 28 | 24 | 4 | 19 | 0 | 0 | 0 | 0 | 1 | 7 ⁴ |
| Advertisements | 1 | 1 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 |
| Listed Building Consent to Alter/Extend | 2 | 2 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 |
| Listed Building Consent to Demolish | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Certificates of Lawful Development ⁵ | 1 | 1 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 |
| Notifications ⁵ | 5 | 5 | 0 | 3 | 0 | 0 | 0 | 0 | 0 | 2 |
| Other applications total | 39 | 34 | 5 | 26 | 1 | 0 | 0 | 0 | 1 | 10 |

⁴ Applications where an extension of time was agreed which was not achieved are not explicitly stated, hence discrepancy in time related figures (27) and total (28).

⁵ Applications for Lawful Development Certificates and Notifications are not counted in the statistics report for planning applications. As a result, these figures are not included in the total row in Table 4.

Table 4

Totals by application category

| Application type | Total | Granted | Refused | 8 weeks or less | More than 8 and up to 13 weeks | More than 13 and up to 16 weeks | More than 16 and up to 26 weeks | More than 26 and up to 52 weeks | More than 52 weeks | Within agreed extension of time |
|--------------------------|-----------|-------------|-------------|-----------------|--------------------------------|---------------------------------|---------------------------------|---------------------------------|--------------------|---------------------------------|
| Major applications | 1 | 1 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 |
| Minor applications total | 14 | 14 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 7 |
| Other applications total | 33 | 28 | 5 | 23 | 0 | 0 | 0 | 0 | 1 | 8 ⁶ |
| TOTAL | 48 | 43 | 5 | 30 | 1 | 0 | 0 | 0 | 1 | 15 |
| Percentage (%) | | 89.6 | 10.4 | 62.5 | 2.1 | 0 | 0 | 0 | 2.1 | 31.2 |

⁶ Applications where an extension of time was agreed which was not achieved are not explicitly stated, hence discrepancy in time related figures (27) and total (28).

Planning Committee

11 November 2022

Agenda item number 13

Appeals to the Secretary of State update

Report by Senior Planning Officer

Summary

This report sets out the position regarding appeals against the Authority.

Recommendation

To note the report.

| Application reference number | Applicant | Start date of appeal | Location | Nature of appeal/ description of development | Decision and dates |
|--|-----------------|--|--|--|--|
| APP/E9505/C/21/3269284 BA/2017/0035/UNAUP3 | Mr Henry Harvey | Appeal received by the BA on 18 February 2021 Appeal start date 26 April 2021 | Land East Of Brograve Mill Coast Road Waxham | Appeal against Enforcement Notice | Committee Decision 8 January 2021 LPA Statement submitted 7 June 2021 |

| Application reference number | Applicant | Start date of appeal | Location | Nature of appeal/ description of development | Decision and dates |
|--|--------------------|--|---|--|---|
| APP/E9505/W/22/3291736 BA/2021/0244/FUL | Messrs T.A. Graham | Appeal received by the BA on 31 January 2022 Appeal start date 22 June 2022 | The Shrublands, Grays Road, Burgh St Peter | Appeal against refusal of planning permission: Proposed retention of timber tepee structure and use as glamping accommodation as farm diversification scheme. | Delegated Decision 31 August 2021 LPA statement submitted 27 July 2022 |
| APP/E9505/W/22/3291822 BA/2021/0253/COND | Mr P Young | Appeal received by the BA on 1 February 2022 Appeal start date 1 July 2022 | Marshmans Cottage Main Road A1064 Billockby Fleggburgh | Appeal against refusal of planning permission: Revised width of building and change use of loft space, variation of conditions 2 and 7 of permission BA/2020/0083/HOUSEH | Delegated Decision 7 December 2021 LPA statement submitted 5 August 2022 |
| APP/E9505/W/22/3292450 BA/2021/0239/FUL | Mr Gavin Church | Appeal received by the BA on 9 February 2022 Appeal start date 30 June 2022 | Priory Cottage St. Marys Road, Aldeby | Appeal against the refusal of planning permission: Use of land for siting 4 No. Bell Tents and 4 No. wash sheds with compostable toilets (retrospective) | Delegated Decision 24 August 2021 LPA statement submitted 2 August 2022 |

| Application reference number | Applicant | Start date of appeal | Location | Nature of appeal/ description of development | Decision and dates |
|--|------------------|--|--|---|---|
| APP/E9505/W/22/3294205 BA/2021/0211/FUL | Mr Alan Gepp | Appeal received by the BA on 8 March 2022 Appeal start date 1 July 2022 | Broadgate, Horsefen Road, Ludham | Appeal against the refusal of planning permission: Change of use to dwelling and retail bakery (sui generis mixed use) including the erection of a single storey extension. | Committee Decision 8 February 2022 LPA statement submitted 5 August 2022 |
| APP/E9505/W/22/3295628 BA/2022/0022/FUL | Mr Matthew Hales | Appeal received by the BA 28 March 2022 Appeal start date 22 July 2022 | Clean & Coat Ltd, 54B Yarmouth Road Thorpe St Andrew | Appeal against Condition 4, imposed on planning permission BA/2022/0022/FUL | Delegated decision 25 March 2022 LPA Statement submitted 25 August 2022 |
| APP/E9505/W/22/3300601 BA/2021/0451/COND | Mr A Cook | Appeal received by the BA on 8 June 2022 | Wayford Park River Holidays, Wayford Bridge | Appeal against refusal of planning permission: Incorporate shipping container into building, variation of condition 2 of permission BA/2017/0376/FUL (retrospective.) | Delegated Decision 31 January 2022 Questionnaire submitted 7 October 2022. LPA statement due 4 November 2022. |

| Application reference number | Applicant | Start date of appeal | Location | Nature of appeal/ description of development | Decision and dates |
|--|------------------|---|--|--|--|
| APP/E9505/C/22/3301919 BA/2022/0023/UNAUP2 | Mr R Hollocks | Appeal received by the BA on 27 June 2022 Appeal start date 28 July 2022 | Beauchamp Arms, Ferry Road Carleton St Peter | Appeal against Enforcement Notice - lighting and kerbing | Committee Decision 27 May 2022 LPA statement submitted 25 August 2022 |
| BA/2022/0021/UNAUP2 APP/E9505/C/22/3301976 | Mr R Hollocks | Appeal received by the BA on 27 June 2022 Appeal start date 28 July 2022 | Beauchamp Arms, Ferry Road Carleton St Peter | Appeal against Enforcement Notice - workshop | Committee Decision 27 May 2022 LPA statement submitted 25 August 2022 |
| BA/2021/0490/FUL APP/E9505/W/22/3303030 | Mr N Mackmin | Appeal received by the BA on 13 July 2022 | The Old Bridge Hotel Site, The Causeway, Repps with Bastwick | Appeal against refusal of planning permission: 8 one-bedroom & 4 two-bedroom flats for holiday use with restaurant & covered car-park at ground level. | Committee Decision 7 March 2022 Awaiting start date. |

| Application reference number | Applicant | Start date of appeal | Location | Nature of appeal/ description of development | Decision and dates |
|--|---------------------------------|---|--|---|--|
| BA/2022/0017/FUL APP/E9505/W/22/3304463 | Mr S Hooper & Ms M Alexander | Appeal received by the BA on 3 August 2022 | Blackwater Carr Land Off Ferry Lane, Postwick | Appeal against refusal of planning permission: Retrospective consent for the use of a yurt on a small, raised platform, securing a table and bench to the ground, the installation of a small staked and woven willow windbreak. | Delegated Decision 8 June 2022 Awaiting start date. |
| BA/2021/0193/HOUSEH APP/E9505/D/22/3307318 | Dr Peter Jackson | Appeal received by the BA on 22 September 2022 | 4 Bureside Estate, Crabbetts Marsh, NR12 8JP | Appeal against refusal of planning permission: Erection of fence | Delegated Decision 29 July 2022 Awaiting start date. |
| BA/2021/0295/FUL APP/E9505/W/22/3308360 | Trilogy Ltd | Appeal received by the BA 5 October 2022 | Morrisons Foodstore, Beccles, NR34 9EJ | Appeal against refusal of planning permission: Coffee Shop with Drive Thru Facility | Delegated Decision 8 April 2022 Awaiting start date. |

| Application reference number | Applicant | Start date of appeal | Location | Nature of appeal/ description of development | Decision and dates |
|--|-------------------------|--|--|--|--|
| BA/2022/0112/HOUSEH APP/E9505/D/22/3309270 | Alan and Joyce Hobbs | Appeal received by the BA on 18 October 2022 | Bridge Farm, Main Road, Acle Bridge, NR13 3AT | Appeal against refusal of planning permission: Erection of a dormer window and external balcony to domestic outbuilding including external staircase (Retrospective). | Delegated Decision 26 July 2022 Awaiting start date. |

Author: Cheryl Peel

Date of report: 28 October 2022

Background papers: BA appeal and application files

Planning Committee

11 November 2022

Agenda item number 14

Decisions made by officers under delegated powers

Report by Senior Planning Officer

Summary

This report sets out the delegated decisions made by officers on planning applications from 05 October 2022 to 28 October 2022 and Tree Preservation Orders confirmed within this period.

Recommendation

To note the report.

| Parish | Application | Site | Applicant | Proposal | Decision |
|--|---------------------|---|------------------|--|-------------------------------|
| Barton Turf And Irstead Parish Council | BA/2022/0264/HOUSEH | Driftway Lodge Hall Road Barton Turf Norfolk NR12 8AR | Ms Sara Westwood | New porch, alterations to existing openings & replacement of boundary fences | Approve Subject to Conditions |
| Beccles Town Council | BA/2022/0303/HOUSEH | Home Lodge 33 Northgate Beccles Suffolk NR34 9AS | Mr H Alton | Replacement garage door | Approve Subject to Conditions |

| Parish | Application | Site | Applicant | Proposal | Decision |
|----------------------------|---------------------|---|--------------------|---|-------------------------------|
| Coltishall Parish Council | BA/2022/0170/ADV | The Rising Sun Wroxham Road Coltishall Norwich Norfolk NR12 7EA | Mr Mark Wilkinson | 1 x printed sign on a rigid board joined to a plywood backing and supported on timber posts, and 1 x Banner style PVC fascia sign (part retrospective) | Approve Subject to Conditions |
| Coltishall Parish Council | BA/2022/0300/LBC | The Limes 12 Wroxham Road Coltishall Norwich Norfolk NR12 7EA | Miss Gillian Riley | Like-for-like replacement of hayloft door | Approve Subject to Conditions |
| Dilham Parish Council | BA/2022/0307/COND | 2 Mill Common, Meadow Cottage Honing Road Dilham Norfolk NR28 9PL | Ms Lorraine Warner | Change of external materials, variation of condition 2 of permission BA/2022/0157/HOUSEH | Approve Subject to Conditions |
| Ditchingham Parish Council | BA/2022/0290/FUL | 2 Ditchingham Dam Ditchingham Norfolk NR35 2JQ | Ms Pamela Plews | Installation of a hard bank at the base of the gable end | Approve Subject to Conditions |
| Hoveton Parish Council | BA/2022/0305/HOUSEH | 3 Station Cottages Station Road Hoveton Norfolk NR12 8UR | Mr Lee White | Proposed Single Storey rear extension to house (resubmission to vary external materials and finishes previously approved on application BA/2022/0182/HOUSEH) | Approve Subject to Conditions |

| Parish | Application | Site | Applicant | Proposal | Decision |
|-------------------------------------|---------------------|--|----------------------|--|-------------------------------|
| Langley With Hardley Parish Council | BA/2022/0257/FUL | Langley Abbey Langley Green Langley Norfolk NR14 6DG | Mr Chris Townsend | Change of use of part of the stable block to grooms' accommodation (retrospective). | Approve Subject to Conditions |
| Langley With Hardley Parish Council | BA/2022/0301/HOUSEH | Chet Cottage Hardley Road Hardley Norfolk NR14 6DA | Mr Mark Whitehouse | Proposed extension above existing single storey part of building and replacement windows with UPVC | Approve Subject to Conditions |
| Ludham Parish Council | BA/2022/0244/HOUSEH | Nestledown Cottage 2 Johnson Street Ludham Norfolk NR29 5NY | Mr R Pinning | The replacement of X3 windows to the property Lounge front, Lounge rear, Bathroom | Approve Subject to Conditions |
| Oulton Broad Parish Council | BA/2022/0279/FUL | Landspring Drain Oulton Broad Lowestoft Suffolk NR33 9LQ | East Suffolk Council | Replacement bridge | Approve Subject to Conditions |
| Postwick With Witton Parish Council | BA/2022/0302/COND | The Old Stables Hall Lane Postwick Norwich Norfolk NR13 5HQ | Mrs A Loake | Change of approved plans, variation of condition 2 of permission BA/2019/0393/COND | Approve Subject to Conditions |

| Parish | Application | Site | Applicant | Proposal | Decision |
|---------------------------|---------------------|---|-----------------------|---|-------------------------------|
| Surlingham Parish Council | BA/2022/0293/FUL | Wheatfen Broad Nature Reserve The Covey Surlingham Norfolk NR14 7AL | Mr W Fitch | To replace the remaining timber boardwalks and bridges with re-cycled plastic. | Approve Subject to Conditions |
| Wroxham Parish Council | BA/2022/0291/HOUSEH | 38 Staitheway Road Wroxham Norwich Norfolk NR12 8TH | Jane Pendlebury-Green | Replacement of north elevation first floor timber hinged doors with 3 no sliding aluminium doors and removal of central brick pier. | Approve Subject to Conditions |

Tree Preservation Orders confirmed by officers under delegated powers

| Parish | Address | Reference number | Description |
|--------|---------|------------------|-------------|
| N/A | N/A | N/A | N/A |

Author: Cheryl Peel

Date of report: 31 October 2022