A Draft Supplementary Planning Document (SPD) has been prepared to provide more detailed guidance for development proposals located in the Coastal Change Management Area in Waveney. It will assist with the implementation of Policies DM06 ‘Coastal Change Management Area’, DM07 ‘Relocation and Replacement of Development Affected by Coastal Erosion Risk’ and DM22 ‘Housing Development in the Countryside’ of the Development Management Policies.

To determine potential content, the preparation of this draft document included a preliminary focused consultation with key stakeholders, residents and businesses located within the Coastal Change Management Area and those having an interest in coastal risk issues. The consultation included residents, landowners and businesses within the Coastal Change Management Area, members of the Developer Forum, adjoining coastal authorities, ward and town councillors and a selection of statutory consultees who may have an interest in development in coastal locations. Consultees were contacted by email or letter. A list of consultees is provided below. Links to key documents were provided on the council’s website. The consultation was open for 6 weeks between the 15th June 2012 and 27th July 2012. There were 21 representations to the consultation.

The Draft SPD has been prepared and approved in conjunction with the Local Development Framework Working Group. This working group consists of 13 elected members and Council officers from Planning, Housing and Regeneration.

**Town and Parish Councils Coastal Communities**

Benacre Parish Meeting
Corton Parish Council
Covehithe Parish Meeting
Gisleham Parish Council
Kessingland Parish Council
Reydon Parish Council
Southwold Town Council
Wangford Parish Council
Wrentham Parish Council

**Adjoining Coastal Authorities**

Great Yarmouth Borough Council
Suffolk Coastal District Council
Norfolk County Council
Suffolk County Council

**Local Bodies/Organisations**

Associated British Ports
Blyth Estuary Group
Crown Estate Office
Internal Drainage Board
Kirkley Business Association
Lowestoft and Waveney Chamber of Commerce
Lowestoft Civic Society
Lowestoft Harbour Maritime Business Group
Mr Brandon Lewis MP for Great Yarmouth
Mr Peter Aldous MP for Waveney
RSPB East of England
Suffolk Amphibian and Reptile Group
Suffolk Coast and Heaths AONB Unit
Suffolk Fire and Rescue Service (Planning and Review)
Suffolk Fire and Rescue Service (Lowestoft)
Suffolk Preservation Society
Suffolk Wildlife Trust
The Broads Society
The National Trust, East of England Regional Office
The Woodland Trust
Therese Coffey MP for Suffolk Coastal
Waveney Economic Partnership
Waveney Tourism Forum

Statutory Bodies

Anglian Water
Broads Authority
English Heritage
Environment Agency
Essex & Suffolk Water Company
Highways Agency
Homes and Communities Agency
Natural England
The Southwold and Reydon Society

Developers Forum Members

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<th>Company</th>
<th>Agent/Role</th>
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<tr>
<td>AAK Design Associates Ltd</td>
<td>M. Dixon (Agent)</td>
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<td>Arnolds Chartered Surveyors</td>
<td>M S Oakes Ltd</td>
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<td>Ashgate Construction Limited</td>
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<td>Oldman Homes Ltd</td>
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<td>Badger Building East Anglia Ltd</td>
<td>OWL Partnership</td>
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<td>B. Cutts (Agent)</td>
<td>P. England (Agent)</td>
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<td>Barsham Securities Ltd</td>
<td>Paul Robinson Partnership</td>
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<tr>
<td>Brian Haward Chartered Architect</td>
<td>P. Tungate (Agent)</td>
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<td>Brian Sabberton Ltd</td>
<td>Persimmon Homes (Anglia) Ltd</td>
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<td>Chaplin Farrant Ltd</td>
<td>PDA Architectural</td>
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<td>Chediston Homes Ltd</td>
<td>P J Spillings</td>
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<td>Garret Design</td>
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<td>Graham Ling Architectural Consultant</td>
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<td>Howard Group New Homes Land</td>
<td>Vaughan Keal Associates</td>
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**Other Consultees**

Other consultees included approximately 300 homes and businesses located within the Coastal Change Management Area.

Other Waveney District Council teams from Development Management, Strategic Housing and Coastal Management.

Ward Councillors of constituencies likely to be affected by coastal erosion.

**Responses to the preliminary Development and Coastal Change Supplementary Planning Document Consultation 2012**

Responses were received from WDC Development Management, Natural England, Suffolk County Council, Environment Agency, Highways Agency, Essex and Suffolk Water, Norfolk County Council, Kessingland Parish Council, WDC Coastal Management, Suffolk Coasts and Heaths, one Developer Forum member and 8 residents. The following pages provide a summary of the issues raised to the preliminary consultation and how they have been addressed for the Final Draft Development and Coastal Change SPD.

**Risk Assessment**

Q1. All new development in the Coastal Change Management Area (CCMA) will be required to consider risk as part of the planning application process. A Coastal Erosion Vulnerability Assessment will need to be carried out. The content of this will be discussed in the SPD. Bearing in mind that not all applications are the same and risk may vary accordingly, is it sufficient to provide a simple list of areas to cover in the assessment or is a more detailed explanation required?

Options could include:

a) To set out in full for each type of development the required content of the assessment.

b) For smaller developments, such as extensions to dwellings, provide a standard form to complete covering the relevant criteria for the assessment.

c) Provide a flow diagram to direct the content of the assessment.

d) Combination of the above.

**Comments received**

Of the 13 respondents who answered this question no overriding approach has been identified, with an even split across all options. The Coastal Management Team has highlighted the need for clarity for what is required for each level of assessment to reduce decision making delays and confusion. A combination of both options a) and c) has been recommended.

**Response:** As no consensus has been reached for the approach to be taken for risk.
assessment, comments from the Coastal Management Team will be given the main consideration along with those from SCC and Environment Agency. As recommended a combination of options a) and c) will be adopted in the SPD. Detailed guidance will be set out in the SPD and a flow diagram provided.

Shoreline Management Plan Information

Q2. Development Management Policies DM06 and DM07 set out the approach to development within the CCMA. Supporting text includes reference to the three different risk areas identified in the Shoreline Management Plan’s but the adopted Proposals Map only shows where the coastline is predicted to be in 100 years time based on current information. Should the SMP plans be reproduced in the SPD for greater clarity or do you think that it is sufficient to provide links to these documents?

Comments received

From the responses received it is clear that most people would prefer that the SPD included the SMP maps rather than providing links to the documents. In particular the Coastal Management Team and the Environment Agency suggested that clear/simplified maps are reproduced in the SPD with web links to the Shoreline Management Plans also provided for detailed information.

Response: The Shoreline Management Plans are very detailed and in some cases quite difficult to interpret. It is agreed that the relevant maps should be included in the SPD, however for the purposes of clarity these will be simplified. Links to the full SMP documents will still be provided and it will be made clear that this is still the place to find the most detailed information.

Occupancy Restrictions

Adopted Development Management Policy DM22 permits relocation of properties at risk of coastal erosion to alternative locations, which could be on sites not normally considered acceptable for new residential development.

Q3a. Because new dwellings are likely to be permitted on sites not normally granted planning permission for housing, do you think that relocated properties should have an occupancy restriction placed on them to ensure that they are either:-

i) retained in perpetuity for occupancy by residents affected by coastal erosion; or

ii) that they are ‘first’ occupied by an individual or family affected by coastal erosion?

Comments Received

Only two respondents considered that it would be appropriate to apply perpetuity clauses to occupancy of the new dwellings although of those who answered this question only one person thought that first occupation should not be restricted to the displaced homeowners.

Q3b. Do you think that any future sale of the relocated dwellings should be first made available to people who are affected by coastal erosion? or
Q3c. If there is no demand for this that the properties should then be offered to local people before being made available for sale on the wider open market? or

Q3d. Should no restrictions be placed on replacement dwellings?

**Comments received**

The majority of respondents to these questions considered that it would be appropriate to offer properties to those affected by coastal erosion before being sold on the open market, however there was concern that this should not be at reduced cost. There was an equal split as to whether the properties should then be offered to local people before being made available on the open market. But it was clear from respondents that while it was considered there should be some restrictions on occupancy the restrictions should not disadvantage the original property owner.

**Response:** The preferred approach is that first occupancy of replacement dwellings should be by people directly affected by coastal erosion. However subsequent occupancy should be unrestricted and sale on the open market will prevent disadvantaging individuals a second time.

**Re-allocation of public funding and profit**

Q4a. When considering relocation of dwellings would you agree that a proportion of any profit made if the property is subsequently sold should be redirected to benefit other home owners affected by coastal erosion in the future to relocate?

**Comments received**

Only one person agreed that this approach would be acceptable and that the property owner should not benefit from profit but only be recompensed for their loss.

A suggested option is to take a capped amount from any profit from the sale of the replacement dwelling to repay any demolition costs. This then returned to fund future demolition costs.

Q4b. or should this only apply if public or grant funding has been used to facilitate this move?

i) If so do you agree that the original amount of public funding should be returned?

ii) Would you also agree that the amount returned should be linked to inflation to take account of any increase in the value of the original fund?

**Comments received**

In general returning public funding for future reuse was considered a good idea with some agreement that this should be enhanced with inflation. The overriding concern however was that individuals already disadvantaged by their situation should be left no worse off. One person considered that there should be no profit from the public funding element. Another response stated that public funds should not be used at all bearing in mind that individuals would know of the risks associated with buying coastal properties.
Response: Most comments received on this subject show agreement for the return of public funding to a coastal erosion 'pot' for other projects, consideration will be given to whether this is too complicated to administer and if not whether repayments should be enhanced to take account of inflation. Consideration will also be given to whether demolition costs should also be recouped and made available for reuse.

Replacement Dwelling Criteria

Q5a. Do you agree that in terms of scale/size/design any replacement dwelling should be on a like-for-like basis only, which is consistent with the approach set out in Policy DM21 of the Development Management Policies DPD relating to replacement dwellings in the countryside?

Q5b. If not what criteria do you think should be applied?

Comments received

In relation to the size of the dwelling, there was overall agreement that they should be similar to that being replaced. Some concessions should be made to allow for individual/family requirements and to take account of modern building methods. Some modest increase in size should be permitted.

One person would like no restrictions on the size, design or scale and another suggested that new dwellings should be based on the number of bedrooms required.

Consideration should be given to added ‘eco-and-design’ credibility.

Response: Housing development in the countryside is controlled by the criteria set out in DM21 with some allowances for modest increase in size taking into account permitted development for extensions. Having no restrictions in place to limit the size of the replacement dwellings would be contrary to this policy. Design can however be improved and should take account of the location. Relying on bedroom numbers could be appropriate however care would need to be taken to limit the floor space overall. Sustainable construction forms part of planning application consideration already.

Q6a. A dwelling that existed on 25\textsuperscript{th} June 2010\textsuperscript{1}, and is predicted to be affected by coastal erosion within 20 years of the date a planning application for a replacement dwelling is submitted to the Local Planning Authority, whether it still exists or has been demolished for safety reasons, will be eligible to be considered for relocation under policy DM22. Do you agree with this approach?

6b. If not what alternative date should be applied and why?

Comments received

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\textsuperscript{1} The date that the Development Management Policies DPD was submitted to the Planning Inspectorate for independent examination. On this date the policies gained significant weight for use in the determination of planning applications.
No respondents disagreed with the date and no one suggested any alternative dates for eligibility purposes of Policy DM22. Although not the purpose of the question, comments were made regarding the 20 year time period. One person felt that a 5 year timeframes should be used to assess imminent risk, while another felt that 40 years would be more appropriate given the anticipated lifetime of existing defences.

**Response:** This question was to establish if the date to be eligible for policy DM22 was appropriate and no one disagreed that it was not. The 20 year period is set out in the adopted policy, therefore suggestions for different time period are not appropriate for the SPD but will be considered with any future review of the policy.

**Use of Vacant Dwellings**

Q7. As a result of replacement dwellings and relocation, some dwellings will become vacant not imminently affected by coastal erosion.

   i) Should these be demolished; or

   ii) Do you think that other residential or non-residential short term uses may be appropriate?

   iii) If so what type of uses should be considered?

**Comments received**

For most people demolition of dwellings that could still have a use should be avoided although this will depend on the timeframe for loss to erosion. Continued use for residential purposes was not ruled out and was seen as a way to help with housing shortages if taken over by the council or housing provider. Use for community facilities, holiday lets and other business uses were seen to be suitable short term uses and ways to help finance relocations.

As far as possible recycling of building material should be encouraged.

**Response:** It is clear that most people consider that demolition of properties where they have a potential short term reuse should be avoided where possible. Careful management of sites would need to be put in place and any planning permission would require time limit conditions to ensure the sites are monitored at the appropriate time. Private resale should be avoided to limit need for public funding and risks to individuals.

**Coastal Businesses and Tourism Uses**

Q8. Many businesses rely on their coastal location, particularly where they are related to tourism. Do you agree that these types of uses should be allowed to maintain a coastal location either by: -

   i) Allowing changes to site layouts within existing land ownership to move buildings away from short term risk areas; or

   ii) Moving inland to longer term risk areas, but still at future risk of coastal erosion; or
iii) Should businesses be required to relocate to sites outside the coastal erosion risk area entirely?

**Comments received**

Only one person felt that businesses should move out of the coastal erosion risk area completely. Support for both options i) and ii) with the decision to be made by the businesses affected.

**Response:** A pragmatic approach to dealing with businesses and tourism uses along the coast will be taken. Time limited planning consents will be required in some instances and the risk acknowledged by those affected, through risk assessment process.

**Site Allocations**

Q9. Do you think that the Council should allocate sites for new residential, commercial and other community development specifically for relocation of property that will be affected by coastal erosion?

Q9a. If so, where?

**Comments received**

In general it was considered that allocating sites for relocation of development would be good practice. It would allow proper consideration of sites in relation to location and potential site constraints. However, it was also considered that this should only be for larger sites and that more building should be allowed in general.

Where sites were suggested for possible relocations, these were close to or within parish boundaries, clearly showing a desire to retain communities in their current locations.

**Response:** Separate work will be carried out to identify and allocate sites.

**Any other comments?**

Q10. Are there any specific planning issues that you would like to see addressed in the Supplementary Planning Document. In particular any that you consider would help to provide guidance and practical advice for landowners, businesses and homeowners who are likely to be affected by coastal erosion?

**Comments received**

1. The true extent of the coastal erosion is only a best guess and could be more or less depending of a lot of factors.

2. Planning issues should include accelerating the introduction of tidal power harvesting as this reduces the tidal power at the shoreline.


4. Practical advice could be such as hire a private rock barge and drop our own defences.
5. Advice should be coming from the people who approved the SMP, as it is they who agreed the content.

6. It would be great if the practical steps and obligations on landowners faced with coastal erosion could be spelt out plainly and simply to villages.

7. Believe that coastal erosion is cyclic and we cannot build our way out of it, especially with incongruous boulder reefs. Within reason coastal erosion should be left to run its course with protection for obvious weak spots.

8. Those who lose property should be recompensed by the state in a non-profit making scenario or re-housed to the same rather than millions spent on poor short lived and unsightly coastal protection. Sea Palling as an example looks like a building site, completely lost its seaside quality.

9. Existing primary settlements and historic sites must be protected (within reason).

10. Protection of Landscape Character should be part of the introductory background. If there is no intention of relocation of sites or development within the AONB or National Parks the SPD should make this clear.

11. Prospective house/land purchasers or property developers should be required to consult the relevant parts of the Shoreline Management Plans to gain an understanding of the risks and uncertainties associated with future shoreline evolution.

12. Those who are seeking to make investment decisions in the coastal zone should recognise that the forecasting of coastal change is very difficult and hence predictions for future erosion timing and extent should be regarded as approximate, liable to change and subject to frequent review.

13. Where erosion is forecast to be resisted by defences normally associated with a Hold the Line policy risks need to be considered regarding increased environmental pressure due to climate change, limited availability of funding to deliver policies for protection and other management measures and potential for future spending to require increasing contributions from those who benefit from protection.

14. Kessingland Parish Council is already working closely with the Environment Agency in relation to flooding along the River Hundred lowlands and southern parts of the village and cut off the A12. Policy for this area needs to have specific clearly defined guidelines that will provide practical advice for landowners, businesses and homeowners who are likely to be affected. The SPD should be linked to the SMP policy.

15. The predicted line of erosion would affect part of the water network. Assuming the abandonment of property and public highway is carried out in a planned and controlled manner, new water mains can be laid and affected mains abandoned. Request that Essex and Suffolk Water is consulted at early stages of any proposed schemes to the highways and properties by WDC so changes to the water network can be planned.
16. No more properties either residential or businesses should be allowed to be built with immediate effect.

17. Differing abilities of residents to pay for new dwellings.

**Response:**

1. Comment noted, the most up to date information should always be referred to when considering development in the CCMA, the SPD will make that clear.
2. Offshore renewable energy schemes are not controlled by the LPA.
3. Comment noted but not relevant to implementation of the adopted planning policies. Beyond the scope of this SPD.
4. Private coast protection schemes may be appropriate but would need to take into account the wider impacts on the coastline elsewhere. The technical nature of this is not appropriate for this SPD.
5. Comment relates to the policies in the Shoreline Management Plan, the SPD is linked to the Development Management Policies for new development and therefore it is relevant for the LPA to produce the guidance.
6. Comment noted. It is the intention to provide guidance for landowners and villages.
7. Comment noted.
8. In an ideal situation this would be the case but as funding is limited a mechanism for dealing with coastal change is required.
9. As far as possible existing settlements are protected by defences, but not in all cases.
10. New development in the countryside will be assessed against landscape criteria and this will be made explicit in the guidance.
11. Agree that land and property purchasers should be fully aware of the risks associated with coastal property. Clear links between the SPD and the SMP will be made in the document.
12. Agreed that forecasting exact coastline position is uncertain. The SPD will make this clear.
13. Increased contributions from those benefiting from coast protection may be required and the SPD will highlight this potential to ensure this is taken into account before investment is made in coastal properties.
14. Specific policy guidance will be provided for different types of development with clear links to the SMP policies.
15. Reference will be made to infrastructure relocation.
16. Comments noted, new residential properties will not be permitted although a more pragmatic approach to existing businesses will be taken to ensure continued community and tourism benefits.
17. Agree that homeowner’s ability to pay for relocation is inequitable but this is outside the control of the LPA.