

Draft Policy LP15 – Coastal Change Management Area (Hunstanton to Dersingham)

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542893008419#section-s1542893008419>

Consideration of issues:

The main issues raised by consultees were:

- The Environment Agency (EA) recommended a number of minor changes which are recommended to be accepted.
- The need for a more strategic approach to climate change and sea level rise covering the entire coastal area. The new Climate Change policy will deal with issues around the impact of sea level rise on northern coastal areas.
- The restrictions on new development in this area. These are appropriate given the very low standard of protection and risk of overtopping and breaching of defences in this part of the borough. No change is recommended.
- The approach to temporary, time-limited consents and whether this is in line with national policy on Coastal Change Management Areas. The policy provides for existing temporary consents to be renewed in line with the funding agreement that exists through the Community Interest Company (CIC).

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group: The Task Group is recommended to:

- 1) Amend the description of the area where the policy applies as suggested by the EA.
- 2) Amend policy wording 1. and 2. by deleting 'tidal Flood Zone 3' and replacing with 'areas at risk of flooding in a 1 in 200 AEP event (including the relevant allowance for climate change), either directly or as a result of a breach in the coastal defences'.
- 3) Rephrase 2d. to: "the dwelling will incorporate 'resistance and resilience' measures...." to replace 'flood mitigation and resiliency'.
- 4) Change 'should' in policy wording 2g. and 4 to 'must'.
- 5) Amend 4 to state that 'Extensions that encroach within 16m of the toe of the flood defences will not be permitted.'
- 6) Update the wording of para. 6.2.2.
- 7) Include a reference to UKCIP in para. 6.2.5.
- 8) Amend the wording of 6.2.6 by deleting 'The required standard of protection from tidal flood risk, as stipulated in the National Planning Practice Guidance is one in 200 years (0.5% annual probability).' Replace with 'Although there are defences in place, the standard of protection they offer is low so there remains a significant risk of them being overtopped and/or breached within the lifetime of the development.'

Policy Recommendation:

Policy LP15 – Coastal Change Management Area (Hunstanton to Dersingham)

This policy applies within the area identified as being at risk of flooding during a 1 in 200 AEP event, now and in the future, either directly or through the failure of the coastal flood defences. An indicative area is illustrated within the Coastal Change Management Area as defined on the Policies Map.

New Developments

1. The following developments will not be permitted within areas at risk of flooding in a 1 in 200 AEP event (including the relevant allowance for climate change), either directly or as a result of a breach in the coastal defences Tidal Flood Zone 3 (including climate change) as designated on the Strategic Flood Risk Assessment (SFRA) Maps:
 - a. new dwellings;
 - b. new or additional park homes/caravans.

Replacement Dwellings

2. Replacement dwellings will only be permitted in areas at risk of flooding in a 1 in 200 AEP event (including the relevant allowance for climate change), either directly or as a result of a breach in the coastal defences Tidal Flood Zone 3 where all of the following seven criteria are satisfied:
 - a. a Flood Risk Assessment (FRA) must be undertaken for the development;
 - b. all habitable accommodation will be provided above ground floor level (habitable accommodation would usually include bedrooms, sitting rooms, dining rooms, kitchens and any other room designed for habitation. Rooms that are not normally used for living in, such as toilets, storerooms, pantries, cellars and garages, are not considered to be habitable);
 - c. The dwelling will only be occupied between 1st April and 30th September in any one year;
 - d. the dwelling will incorporate resistance ~~resilience~~ resilience ~~resiliency~~ measures in accordance with the Department for Communities and Local Government publication: “Improving the flood performance of new buildings, flood resilient construction” (2007);
 - e. the building must be appropriately designed to withstand and be resilient to hydrostatic pressure resulting from a breach/overtopping of the tidal defences;
 - f. a flood warning and evacuation plan will be prepared for the property and retained on site;

- g. the level of habitable accommodation provided by the new dwelling would not be materially greater than that provided by the original dwelling. Proposals ~~should~~ **must** not result in an increase in the number of bedrooms over and above the number in the original dwelling.

Replacement Caravans

3. The replacement of existing permitted caravans will be **allowed, permitted.** **in doing so opportunities should be taken to improve the resilience/resistance of the replacement caravans.**

Extensions

4. Extensions to existing properties (beyond any Permitted Development Rights that could be exercised) ~~should~~ **must** not materially increase the amount of habitable rooms. Significant extensions or those that raise the amount of habitable rooms in the property could lead to an increase in the number of people at risk and will not be permitted. A condition limiting the number of bedrooms will be imposed. **Extensions that encroach within 16m of the toe of the flood defences will not be permitted.**

Change of Use

5. Any proposed Change of Use will not be permitted if, as a result of the change, the flood risk vulnerability (as defined in the National Planning Practice Guidance) would be increased.

Seasonal Occupancy

6. Seasonal occupancy will be limited to between 1 April and 30 September. Applications to remove, relax or vary (by way of extension) any existing seasonal occupancy condition will be resisted.

Temporary Consents

7. Existing temporary consents for the siting of park/mobile homes and caravans will be renewed for a period ~~of 10 years~~ up to 2031. A flood risk assessment will need to be submitted with applications for such renewals.

LP15 Coastal Change Management Area (Hunstanton to Dersingham) Policy (previously DM18)

Introduction

6.2.1 The West Norfolk coastline has seen numerous inundations over the centuries, not least during the floods of 1953. Although defences and emergency arrangements are now much better, continued natural change to the coastline, the deepening challenges to the financial and practical feasibility of maintaining current defences, and the anticipated increased dangers associated with climate change mean that managing coastal flood risk is one of the key challenges for the Borough.

6.2.2 The Wash Shoreline Management Plan (SMP) identified uncertainties over the future management of the flood defences between Hunstanton and Wolferton Creek (west of Dersingham) **beyond 2025**. The current intent of the SMP is to maintain the front line “shingle ridge” defence **up until 2025**. However, this is subject to continued funding and also assumes that no irreparable damage is caused as a result of a storm tide event. **The approval for beach recycling in this area expired in 2012, but was continued until 2016, pending an alternative funding solution.**

6.2.3 The EA and Borough Council continued to work together, along with other key partners, to better understand how coastal processes and climate change may affect this coastline in the future and develop a clearer strategy for its future management and funding. The Wash East Coastal Management Strategy (2015) took this process forward, following on from the SMP (2010) and the Coastal Change Pathfinder study (2011). This work led to the development of a funding mechanism incorporating contributions from the East Wash Coastal Management Community Interest Company (CIC) (formed by local holiday park operators and landowners), Anglian Water Services Limited and the Borough Council. This is overseen by a Funding Group, formed from the funding partners, including the EA and a Stakeholder Forum, led by the Borough Council. Legal agreements were established to ensure that the funding mechanism runs for at least 15 years (i.e. to 2031), providing for the annual beach recycling operation and contributing towards occasional recharge operations.

6.2.4 The policy seeks to prevent inappropriate development in a vulnerable area by adopting a precautionary approach in this location.

Relevant Local and National Policies and Guidance

National Planning Policy Framework: Meeting the challenge of climate change, flooding and coastal change

National Planning Practice Guidance

Strategic Policies:

LP37 Development in Rural Areas

LP14 Coastal Areas

LP16 Flood Risk.

LP06 Economy

Joint Protocol (2012) on Strategic Flood Risk Assessment and Tidal River Hazard Mapping, Environment Agency and Borough Council of King's Lynn & West Norfolk

The Wash Shoreline Management Plan (SMP) (Nov 2010)

The Wash East Coastal Management Strategy (2015)

The Marine Policy Statement/East Marine Plans: Policies:

EC1-2 Economy,

TR3 Tourism and recreation

CC1 Climate change.

Policy Approach

6.2.5 The Shoreline Management Plan identifies that coastal development is likely to be exposed to a much higher risk of flooding within 10 to 15 years, but this could be sooner. The UK Climate Impacts Programme (UKCIP) provides scenarios that show how our climate might change and co-ordinates research on dealing with our future climate.

6.2.6 The Strategic Policies aim to ensure that future growth in the Borough is sustainable and that the findings of the Strategic Flood Risk Assessment are used to guide future growth away from areas of high flood risk. This section of the coastline is considered to be at very high risk with only a one in 50 year (2% annual probability) standard of protection at best. Although there are defences in place, the standard of protection they offer is low so there remains a significant risk of them being overtopped and/or breached within the lifetime of the development. The required standard of protection from tidal flood risk, as stipulated in the National Planning Practice Guidance is one in 200 years (0.5% annual probability).

6.2.7 Considering the risks associated with the seasonality of each of the highest astronomical tides, the probability of storm surges, and wave action severity, reports undertaken for the Borough Council concluded the only safe period of occupancy was between 1 April and 30 September each year. Occupation outside these dates at this location could not be considered safe due to flood risk and would therefore be contrary to the National Planning Policy Framework/Practice Guidance.

6.2.8 A cautious approach will be taken to the renewal of earlier temporary planning permissions for the siting of park/mobile homes and caravans. Regard will be given to the anticipated increase in flood risk associated with rising sea levels, decayed or reduced defences, and climate change. A flood risk assessment will need to be submitted with applications for such renewals (a Flood Risk Assessment form is available from the Borough Council). Existing Article IV directions remove permitted development rights in this area.

Sustainability Appraisal:

LP15 Coastal Change Management Area (Hunstanton to Dersingham) Policy

LP15: Coastal Change Management Area (Hunstanton to Dersingham) Policy																							
Policy	SA Objective:																					Overall Effect	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+		-
LP15	0	0	0	0	0	0	0	++	0	0	++	++	0	0	0	0	0	0	0	0	+6	0	Likely Positive Effect +6
Draft LP15	0	0	0	0	0	0	0	++	0	0	++	++	0	0	0	0	0	0	0	0	+6	-0	Likely Positive Effect +6
No Policy	0	0	0	0	0	0	0	--	0	0	--	--	0	0	0	0	0	0	0	0	-6	0	Likely Neutral Effect

The changes to the policy recommended have no material impact on the scoring – it remains as having a likely positive effect.

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
Town Clerk Hunstanton Town Council	Object	Limitation of occupancy from 1st April to 30 September is blighting regeneration of the South Beach Road Area. In that vicinity there are properties with a whole range of occupancy restrictions which is inconsistent. It is acknowledged that the days are shorter and the weather is usually colder during the winter months which increases the danger. Provided that the other 6 criteria are strictly adhered to including evacuation whenever a flood warning is issued, it is contended that the occupancy restriction is not justified.	Omit the occupancy restriction 1st April to 30 September but amend other sections. The inhabitants must be signed up to an effective flood warning system and on receipt of a warning, the property must be evacuated.	Disagree. The occupancy condition is essential in this area which has a very low standard of protection and falls within the Tidal Hazard Zone. EA response: The occupancy period is the time where large tidal surges are less likely to occur, therefore the risk of flooding is lower. However, the risk does remain that a storm could occur within this period and higher tides are not limited to winter months. The occupancy period was put in place to reduce the risk to existing development, not to unlock sites for development.
Mr Alan Dear	Object	I suggest that the policy LP15 is amended by adding a sub category to 'the change of use' section in the following way:- Offer the opportunity for the owners of empty seaside plots, the	Change of use - Sub Category. Owners of empty seaside plots can apply for a temporary	Disagree. The long-standing approach agreed with the Environment Agency is not to allow any

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		<p>chance to apply for permission to park a drive-on, drive- off vehicle on their plot, during the summer months. This could be administered by offering a temporary permits for 1, 5, 10, 15 yrs. to successful applicants. The consent could be removed at any time if Climate Change starts to effect 'the safe period of occupancy' as stated by the EA as being the 1st April to 30th September.</p> <p>Reason At the moment the two empty plots situated along North Beach, Heacham, in particular run the risk of further deterioration. It is difficult to find the motivation to care for 'a white elephant'. This concession would enable families to enjoy their leisure plots during 'the safe period of occupancy' as quoted by the EA without increasing the risk to life or property.</p> <p>Safety - I don't believe that the proposed 'Change of Use' would result in an increase in the flood risk vulnerability.</p> <p>Reasons - The vehicle can be driven away from the site in seconds, if a dangerously high tide is predicted. The vehicle will not be stored on the site during the winter months A flood warning and evacuation plan will be prepared for the property and retained on site as for 'Replacement Dwellings'.</p>	<p>permit to enable them to park a drive on/ drive off vehicle on their plot during 'the safe period of occupancy' as described by the EA. (between 1 April and 30 September). The permit will be renewed or removed, at the digression of the planners and the EA. If it is considered that a plot has become unsafe for habitation during the summer months, due to an increased risk of Over-topping caused by a Tidal Surge, then the permit will be withdrawn.</p>	<p>new development in this area, time-limited or otherwise, due to the combination of the high level of flood risk and the low standard of protection. The EA does not want us to change this approach and increase the numbers of properties and people at risk in this area. Their view is that although there are defences in place, the standard of protection they offer is low so there remains a significant risk of them being overtopped and/or breached. We, jointly, consider our approach to be an appropriate response, given our particular local circumstances, to national policy guidance, which locally balances to need to protect life and property with the economic value of the area.</p> <p>EA response: Drive on/off</p>

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				<p>permissions: the use of the land to temporary site RV style caravans has a lower risk than the siting of a permanent caravan/park home style dwelling. However, taking a sequential approach it still should be avoided unless it can be demonstrated that there is no other locations, at lower risk of flooding, to locate the required sites. Even then it will need to demonstrate the proposals result in a wider benefit that outweighs the flood risk to meet the requirements of the exception test.</p> <p>The other concern would be that this would result in a steady degradation of the policy position in this area and result in various applications to change the use to permanent caravans.</p>

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				EA response: "Safe period occupancy": The occupancy period is the time where large tidal surges are less likely to occur, therefore the risk of flooding is lower. However, the risk does remain that a storm could occur within this period and higher tides are not limited to winter months. The occupancy period was put in place to reduce the risk to existing development, not to unlock sites for development.
Mr Alan Dear	Object	<p>LP15 – Coastal Change Management Area (Hunstanton to Dersingham) New Developments Paragraph 1. Page 89</p> <p>I think that it would be prudent timing and good management to adapt policy LP15 in the following ways.</p> <p>1a. New Builds. Include new builds situated along North Beach Rd, Heacham in the same section as rebuilds under the same rules and regs. stated in LP15, because unlike South Beach, Heacham, Snettisham and Dersingham they are protected by the, much improved, sea wall. And/or Make provision in the policy LP15 for granting permits for drive-on/ drive-off vehicles for the owners of</p>	<p>Page 89 Paragraph 1 a Delete 'New Build' from section 1a 'New Developments' and include it in section 2 'Replacement Dwellings'</p> <p>Wording – 'New Build situated in North Beach Rd., Heacham, as well as replacement dwellings</p>	<p>Disagree. The long-standing approach agreed with the Environment Agency is not to allow any new development in this area, time-limited or otherwise, due to the combination of the high level of flood risk and the low standard of protection. The EA does not want us to change this</p>

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		<p>the two empty plots. That would give motorhome owners the same benefits as caravan and mobile home owners until 2031.</p> <p>I am requesting this because I think that people are safer than ever before if they own a property along North Beach.</p> <p>My reasons explained:-</p> <ol style="list-style-type: none"> 1 Replacement buildings are sited on plinths or stilts to mitigate against the threat of over-topping. 2 Most are restricted to summer occupancy 'The safe period' which means that few people are resident in the area in the winter when all three floods occurred. 3 The sea wall was tested in 2013 and stood firm. Minimal over-topping occurred along North Beach when devastation was caused elsewhere along the coast. 4 Mike McDonnell through the CIC has raised enough money to support our sea defences until at least 2031. 5 The chance of a Tidal Surge over-topping is predicted as 1/200 each year. There are no recordings of an over-topping in the summer months, which is why it is labelled by the EA as 'the safe period of occupancy' 6 IF there is a tidal threat the upgraded flood warning signs in Hunstanton and Heacham will give people up to 5 hrs warning , and then, nearer to high tide, there will be a request to evacuate if a tidal surge becomes more threatening 7 New Builds on the two empty plots along North Beach are in theory replacement dwellings. Number 64 for example had a really nice 3 bedroom bungalow on it until 1978. <p>Other reasons: How is Climate change going to affect sea levels?</p>	<p>in Tidal Flood zone 3, will only be permitted where the following seven criteria are satisfied.'</p>	<p>approach and increase the numbers of properties and people at risk in this area. Their view is that although there are defences in place, the standard of protection they offer is low so there remains a significant risk of them being overtopped and/or breached. We, jointly, consider our approach to be an appropriate response, given our particular local circumstances, to national policy guidance, which locally balances to need to protect life and property with the economic value of the area.</p> <p>EA response: "Safe period occupancy": The occupancy period is the time where large tidal surges are less likely to occur, therefore the risk of flooding is lower. However, the risk does remain that a storm</p>

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		<p>Statistics and Predictions are only Statistics and Predictions. They are not necessarily fact. I have read more than 20 studies, reports and policies about the effects of Climate Change. I am now totally confused is to whether 'Doomsday' is approaching, or that there is 'not much to worry about', because many of them offer conflicting views. They all claim to use scientific evidence.</p> <p>If we take the worst case scenario and assume that the sea will overtop during every spring tide, we can plan for it. The Dutch see rising sea levels as an opportunity for innovation. They have developed Floating, Pontoon and Stilt Houses to suit the various vulnerable locations. 'Make room for the river' is one of their slogans. There are also many examples in this country. Properties in Maidenhead, Lewis and St Osyth innovative examples.</p> <p>No one knows what is going to happen in the future, we can only predict it. Due to incorrect predictions the planning policies, the owners of my plot have lost up to 40yrs of family fun, unnecessarily, since their bungalow was washed away in 1978. If we are going to work with the predictions of scientists, can we prepare for what might happen in the next 10, 20, 30 yrs. as well as looking 100 years ahead.</p> <p>We could work on data gleaned from the study on sea level rise. The first epoch predicts a possible sea level rise of 30cm in the next 30yrs? Surely we do not have to retreat yet? If a 'Lawful Development Cert.' is not considered appropriate, the owners of the two empty plots could be issued permits valid until the CIC funding runs out. They could then be reviewed, replaced or removed if it was deemed necessary. The owners could enjoy their</p>		<p>could occur within this period and higher tides are not limited to winter months. The occupancy period was put in place to reduce the risk to existing development, not to unlock sites for development.</p>

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		plots while the authorities would retain control of making the ultimate decision. The granting of a permit, for empty plot owners, would give motorhome owners the same benefits as caravan and mobile home owners until 2031. 'A compromise to accommodate, without a compromising in safety'.		
Planning Advisor Environment Agency	Object	Replacement Caravans 3. Replacement of existing permitted caravans will be permitted. Should there be an aspiration to improve the resiliency of the caravans through extensions?	EA clarified that the physical replacement of caravans (if requiring planning permission) would be an opportunity to improve the resilience/resistance of them and if the policy could make this a requirement then this would be beneficial.	Agree amend wording to encourage improved resilience/resistance in replacement caravans.
Planning Advisor Environment Agency	Object	Replacement Dwellings 2 d. reword the bullet point, "the dwelling will incorporate flood mitigation and resiliency ..."	Rephrase to: "the dwelling will incorporate resistance and resilience measures...."	Agree.
Planning Advisor Environment Agency	Object	Use of 'should' in policy wording; change to 'must'.		Agree.
Planning Advisor Environment Agency	Object	Replacement Dwellings - Should there be a condition on all applications that remove the permitted development rights as there is a concern that even minor development near the flood defences could pose a risk to them?		Disagree – this is unnecessary as the area is subject to an Article IV direction removing these

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				rights. We could however reference this in the supporting text.
Planning Advisor Environment Agency	Object	The Coastal Flood Risk Hazard Zone shouldn't be limited to this map, rather it should be a specific flood event scenario.	<p>The area could be the outline for the 0.5% AEP tidal outline, plus an allowance for climate change, and may include a caveat to state that it is subject to change in line with updated climate change allowances.</p> <p>It is also recommended that the Coastal Change Management Area is included on the SFRA mapping.</p>	<p>The policy wording has been amended in line with the EA's subsequent clarifications of the area affected.</p> <p>We can't add the CCMA to the SFRA mapping. This was completed and published in November 2018.</p>
Planning Advisor Environment Agency	Object	Extensions - Ideally this should also restrict extensions that encroach towards the defences.	EA subsequently clarified that this may catch a lot things that they would not be concerned with so it could be worded something like this: "Extensions that encroach within 16m of	Agree.

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			<p>the toe of the flood defences will not be permitted.”</p> <p>16m reflects the Environmental Permitting Regulations requirements for tidal defences. EA are trying to catch those extensions that will further hinder access to the defences.</p>	
<p>Planning Advisor Environment Agency</p>	<p>Object</p>	<p>New developments</p> <p>(1) The following developments will not be permitted within Tidal Flood Zone 3 (including climate change) as designated on the Strategic Flood Risk Assessment (SFRA) Maps. There is a mismatch between the terminology used within the local plan and the SFRA. Flood Zone 3 is not referenced as ‘Tidal Flood Zone 3’ on the SFRA mapping.</p>	<p>EA subsequently clarified that with the updated sea level allowances released in December 2019, the current mapping of the flood risk along the coast (and along the Tidal River) contains a greater level of uncertainty. Without commissioning an update of the Wash Flood Modelling and the Tidal Hazard Mapping, the only way to account for this uncertainty will</p>	<p>Agree – amend policy wording as suggested.</p>

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			<p>be to require applicants to submit an assessment of their tidal flood risk. This will require a broader definition of the area covered by LP15 to include a buffer around the current flood zones/THM extents.</p> <p>Some rough wording: “This policy applies within the area identified as being at risk of flooding during a 1 in 200 AEP event, now and in the future, either directly or through the failure of the coastal flood defences. An indicative area is illustrated within the Coastal Change Management Area on the Policies Map”.</p>	
Planning Advisor Environment Agency	Object		Paragraph 6.2.2 needs to be updated or deleted.	Agree – update para. 6.2.2 as suggested.

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Planning Advisor Environment Agency	Object	6.2.5 UK Climate Impacts Programme (UKCIP) may be a more relevant reference or an additional reference here.	UK Climate Impacts Programme (UKCIP) may be a more relevant reference or an additional reference here.	Agree - include reference to UKCIP in para. 6.2.5.
Planning Advisor Environment Agency	Object	6.2.6 – ‘The required standard of protection from tidal flood risk, as stipulated in the National Planning Practice Guidance is one in 200 years (0.5% annual probability).’ This sentence isn’t very relevant. Areas must be protected to this standard to be classed as an Area Benefitting from Defences in the EA Flood Map, but this point is not relevant for the sequential test. The point to make here is that, although there are defences in place, the standard of protection they offer is low so there remains a significant risk of them being overtopped and/or breached within the lifetime of the development.		Agree – amend wording by deleting this sentence and replacing it with the suggested text.
Parish Clerk Holme-nest-the-Sea Parish Council	Mixed	The value of this policy is recognised but the Borough needs a more strategic approach to climate change and sea level rise covering the entire coastal area. This would take account of the northern coastal areas such as Holme which has managed realignment status in the SMP and where more than 40% of the Parish is at risk from Climate Change.		Disagree - the strategic approach to climate change and sea level rise will be set out in the Climate Change policy. The SMP policy covering the north coast (North Norfolk SMP) is currently going through a refresh process.
McDonnell Caravans	Mixed	My name is Michael McDonnell. My business is McDonnell Caravans based in Gayton, which was established in 1966. I own 7		1. The policy can’t deal with the range of

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		<p>holiday caravan parks in West Norfolk, from Snettisham to Brancaster.</p> <p>I am also responsible for setting up the 'The East Wash Coastal Management Community Interest Company' (C.I.C), which acts as a not for profit company, acting for the interests of the community at large. We have to date raised over £600,000 to be used for the annual RE-CYCLING (of sand) exercise between Snettisham and Hunstanton, in conjunction with The Borough Council and The Environment Agency. We are also accumulating these funds to go towards the cost of a RE-CHARGE, which is when the dredgers come into The Wash and blow back the sand and shingle to help maintain the front line sea defences. There is also a pledge from The Rural Flood Defence Fund to commit £300,000 to this RE-CHARGE exercise when it is required, probably within the next 3-4 years.</p> <p>Because the "C.I.C" has made a 15 year commitment to fund the annual recycling, we have a 42% support grant from Central Government through the 'partnership funding' mechanism, as opposed to the normal 25%. This has been brought about by means of every caravan park owner, in the 'flood risk area' i.e. between the front line and second line of defence, contributing £50 per caravan plot, on an annual basis, in order to ensure that we are using our best efforts to protect our coastline, and preserve its longevity.</p> <p>My comments for your consideration are:</p> <p>1. There is a considerable amount of planning permission</p>		<p>existing permissions and use rights that have arisen over many years in this area.</p> <p>2. The revised policy LP15 does allow for the renewal of existing temporary permissions to 2031 (the end of the current funding agreement).</p> <p>3. Para. 6.2.3 describes the role of the CIC.</p> <p>4. See answer to (2.) above.</p> <p>5. Noted.</p> <p>6. The policy does adopt a positive approach to the renewal of existing permissions. The approach to extensions is necessarily restrictive to avoid more people being put at risk in this area.</p>

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		<p>inconsistency, covering the Snettisham, and Heacham South and North Beach areas.</p> <p>2. There is considerable amount of both uncertainty and unease amongst the various private property owners, many of whom have temporary planning permissions which expire in 2020.</p> <p>3. Local Plan DM18 does not take into account the existence of the C.I.C, and the fact that it has funded the annual RE-CYCLING since 2016, (because of the withdrawal of Central Government funding).</p> <p>4. I suggest that the temporary planning permissions be renewed, either on a permanent basis, with the occupation restrictions, or at the very least that they are renewed up to 2031 or 2032, to coincide with the completion of the 15 year term to which the C.I.C is currently committed. You should also be aware that all of the caravan parks in this area operate from mid-March to October 31st unless they are on the 11 month season.</p> <p>5. The C.I.C is “promoting the retention and/or improvement of local sea defences” as per earlier policy CS07.</p> <p>6. Failure to adopt a more constructive attitude to planning extensions/renewals may lead to the whole of this vulnerable coastal strip being abandoned, which would ultimately result in the loss of the front line defences, in the absence of which the second line of defence, the grass bank, would ultimately also become vulnerable, and the severe economic consequences to the area in general, that would lead to.</p>		<p>7. The restrictions on new development stated in the policy are the long-standing approach agreed with the Environment Agency in the light of the very poor standard of protection and high risk of overtopping/breaching in this part of the borough.</p>

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		<p>A more detailed version of my comments is available in a letter which was sent, by e-mail, to Peter Jermany, on 2nd January this year.</p> <p>7. Whilst I am largely in support of the proposed Policy LP15 – Coastal Change Management Area (Hunstanton to Dersingham), quite obviously there will be a very small number of plots, for example on the North Beach Road at Heacham, where the placing of a holiday caravan or lodge, on a plinth, will NOT lead to a greater flood risk. This is the type of inconsistency which people find difficult to reconcile; replacement of existing permitted caravans is OK, but not next door!!?</p>		