

**KELLING TO LOWESTOFT NESS
SHORELINE MANAGEMENT PLAN**

REVIEW OF CONSULTATION RESPONSES

July 2005



TERRY+OAKES
A S S O C I A T E S

KELLING TO LOWESTOFT NESS SHORELINE MANAGEMENT PLAN

CONSULTATION REPORT July 2005

prepared for

SMP 3B Client Steering Group

by

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TOAL REPORT - ASSURED QUALITY			
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1 INTRODUCTION

- 1.1 On 15 December 2004, North Norfolk District Council, Great Yarmouth Borough Council, Waveney District Council and the Environment Agency (the Operating Authorities and Partners) issued a joint consultation document "Kelling to Lowestoft Ness Shoreline Management Plan – Document for Consultation".
- 1.2 The consultation was part of the review of the original Shoreline Management Plan (SMP) for the coastline between Sheringham, Norfolk, and Lowestoft Ness, Suffolk, which was completed in 1996. This revision of SMP presented the preferred plan and policies for managing the coastline for the next 100 years.
- 1.3 The objectives of the review of the SMP were:
- to define, in general terms, the risks to people and the developed, natural and historic environment within the SMP area over the next century;
 - to identify the preferred policies for managing those risks;
 - to identify the consequences of implementing the preferred policies;
 - to set out procedures for monitoring the effectiveness of the SMP policies;
 - to inform others so that future land use and development of the shoreline can take due account of the risks and preferred SMP policies; and
 - to comply with international and national nature conservation legislation and biodiversity obligations.
- 1.4 The consultation document offered respondents the opportunity to comment on the proposed plan for the future and the policies required for its implementation.
- 1.5 The Partners specified, using Defra guidelines, the means by which the consultation process was to be undertaken and appointed Terry Oakes Associates Ltd, Lowestoft, to manage the process and to receive comments. This report describes how the consultation process was undertaken. It provides an overall analysis of correspondence received and a summary of the opinions expressed.

2 CONSULTATION PROCESS

2.1 Consultation period

- 2.1.1 The consultation period began on 15 December 2004 with an initial closing date for comments of 31 March 2005. During early January 2005, we received a number of requests, from Parish Councils and members of the public, to extend the consultation by a further month to provide additional time for public and parish meetings and to give enough time for the public to absorb the full implications of the SMP. The Client Steering Group met on 19 January 2005 and agreed to extend the closing date to 29 April 2005.

2.2 Availability of consultation documents

- 2.2.1 The full consultation document, including all appendices and maps, was available in electronic format on the Anglian Coastal Authorities Groups' website www.acag.org.uk. A consultation response form¹ was available for download or completion on-line.

- 2.2.2 Printed versions of the consultation document were available for inspection as the following locations:

- North Norfolk District Council offices at Cromer, Fakenham and North Walsham;
- Great Yarmouth Borough Council offices at Maltings House, Great Yarmouth and GYB Services, 101 Churchill Rd Offices, Great Yarmouth;
- Waveney District Council offices at the Town Hall, Lowestoft; and
- Public libraries in Sheringham, Cromer, Holt, North Walsham, Mundesley, Stalham, Martham. Caister, Great Yarmouth, Gorleston and Lowestoft.

- 2.2.3 Copies of the consultation document were provided by the local authorities to following Parish Councils:

- North Norfolk: District Council sent printed versions of the consultation document together with an electronic version of the appendices on CD-ROM to the Parish and Town Councils after the SMP seminar in Cromer on 8 December 2005. The parishes represented were Sidestrand, Happisburgh & Walcott, Mundesley,

¹ See Appendix 1

East and West Runton, Overstrand, Beeston Regis, Bacton and Trimingham; Sheringham and Cromer Town Councils representatives attended too;

- Great Yarmouth Borough Council sent a printed copy of the plan and an electronic version of the appendices (on a CD-ROM) to every parish council in the borough;
- Waveney District Council gave a copy of the consultation document and maps to Corton Parish Council, the only coastal parish in Waveney covered by the SMP proposals.

2.3 Officer Presentations

2.3.1 A series of presentations was given by officers of the local authorities and the Environment Agency and staff of the Halcrow Group:

Location	Venue	Date	Audience
Great Yarmouth	Town Hall	3 November 2004	GYBC Cabinet
Broads Authority	UEA	18 November 2004	Broads Authority Research Panel Advisory Group
Great Yarmouth	Town Hall	2 December 2004	Parish Council representatives
Cromer	Council Offices	8 December 2004	Parish Council representatives
Cromer	Council Offices	14 December 2004	Local businesses
Broads Forum	County Hall, Norwich	16 December 2004	Forum Members
Stalham	Kingfisher Hotel	12 January 2005	Parish Council
Stalham	Sutton Staithe Hotel	19 January 2005	Stalham Farmers Club

Location	Venue	Date	Audience
Great Yarmouth	Town Hall	25 January 2005	Great Yarmouth Environmental Forum
Great Yarmouth	Assembly Rooms	15 February 2005	Parish Council representatives
Lowestoft	Town Hall	21 February 2005	WDC Council
Corton	Village Hall	1 March 2005	Parish Council

2.4 Public exhibitions

- 2.4.1 The public and businesses were invited to a series of public exhibitions where they were able to discuss the proposals contained in the draft SMP with officers of the local authorities and the Environment Agency.

Location	Venue	Dates	Times	Notes
Corton	Village Hall	8 February	2pm to 7:30pm	
Caister	Council Hall	14 February	2pm to 7:30pm	
Great Yarmouth	Town Hall	15 February	2pm to 6:30pm	
Winterton	Village Hall	16 February	9am to 2pm	
Gorleston	Library	17 February	2pm to 7:30pm	Display only
Overstrand	Parish Hall	22 February	2pm to 7:30pm	
Mundesley	Coronation Hall	24 February	2pm to 7:30pm	
Sea Palling	Sea Palling & Waxham Village Hall	25 February	2pm to 7:30pm	

Location	Venue	Dates	Times	Notes
Hemsby	Village Hall	12 March	2pm to 5pm	Display organised by Parish
Martham	Martham CLIP Office	9 April	2pm to 5pm	Display organised by Parish

2.4.2 Information boards were displayed at each of the exhibitions.

2.4.3 The topics covered on the boards included:

- What is a Shoreline Management Plan?
- Background to the Kelling to Lowestoft Ness SMP.
- SMP Study Area.
- Description of Area.
- Characteristics of Area.
- What issues are we facing?
- What would happen if we continue to defend into the future as we have done in the past?
- What would happen if we continue to defend our shorelines in the same locations, as we have done in the past?
- Need for a 'sustainable' approach.
- The SMP Policies.
- The Policy Appraisal Process.
- The Preferred Shoreline Management Plan (a series of 13 plans with explanatory text illustrating the SMP proposals for the coastline).
- Managing the Change.

- How can you get involved?

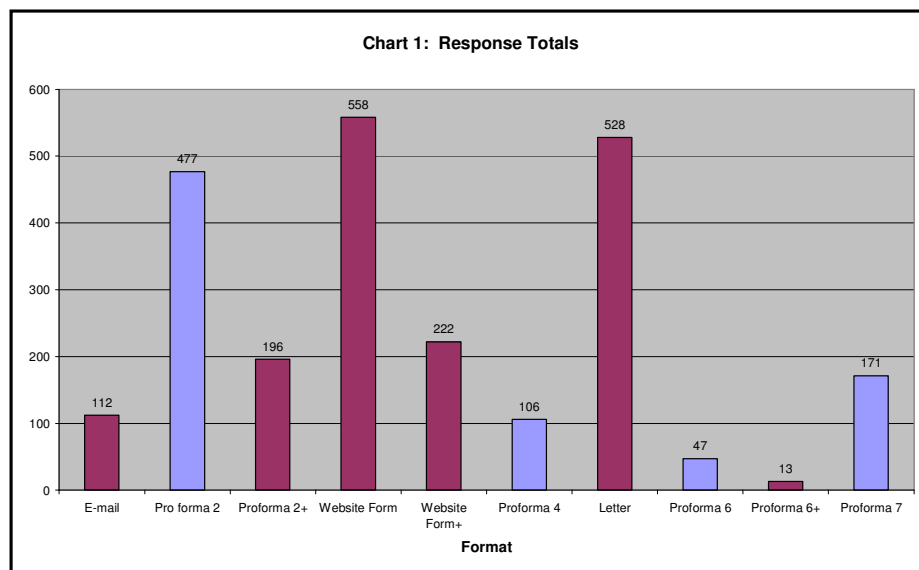
2.4.4 At each of the attended exhibitions, except for Sea Palling, there was a slide show lasting 18 minutes, which illustrated changing coastline and the need for the review of the SMP.

3 FORM OF RESPONSES

3.1.1 2,430 responses were received from residents, businesses, Parish Councils and other organisations. In addition, three petitions signed by 480, 95 and 26 people respectively were received.

3.2 Responses were received in a variety of formats:

- Individually written letters;
- Individually written e-mails;
- Comments at the public exhibitions;
- Individually completed consultation forms downloaded from the website – referred to in this report as Pro-forma 3²;
- Five different pre-printed forms signed by consultees – referred to in this report as Pro-formas 2, 4, 6 and 7³;
- Pre-printed forms signed by consultees with additional comments written by consultees – referred to in this report as Pro-formas 2+, 3+ and 6+⁴.

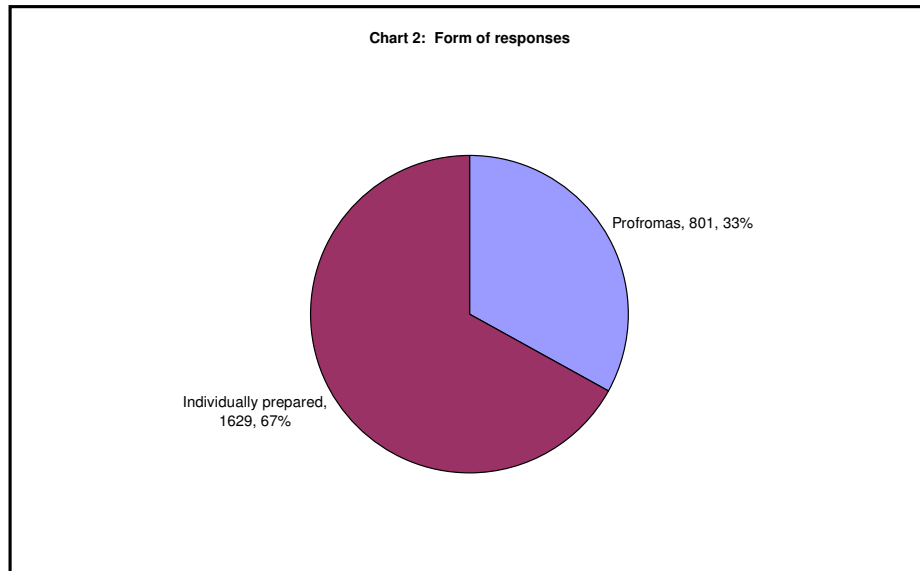


² See Appendix 2

³ See Appendix 3

⁴ See Appendix 4

- 3.3 67% of the responses were either prepared individually or contained individually written comments (shaded maroon on Chart 1). The other 33% of responses were returned as signed pro-formas:



4 METHOD OF ANALYSIS

4.1 All comments and responses received were recorded as detailed below:

- Upon receipt, each response was given a unique reference number and its date of receipt recorded.
- Each response was read on the day of receipt.
- We replied to questions and sought additional information from the Clients and/or Consultant if we were unable to answer the questions ourselves.
- We did not acknowledge receipt of the response unless requested so to do.
- Details of each response were entered on a Microsoft Excel spreadsheet. The details recorded included the unique reference number, the name, address and the postcode of the person making the comment, the format in which the comment was made and a summary of the response.
- As the database grew, we identified twelve dominant strands of comment and added fields for each strand (see next section for details).
- All records of all responses were updated to indicate the strands covered by each response.

4.2 Data contained in the spreadsheet were used to undertake the analysis of responses.

5 ANALYSIS OF RESPONSES

5.1 General

5.1.1 2,430 responses were received in total. Of these, 2,323 responses representing 2,870 people, were received from the public and 104 from businesses, Parish Councils and other organisations⁵. Three petitions signed by 601 people were received. Some consultees sent in more than one response.

5.1.2 2,420 (99.6%) of the total responses objected to the proposals.

5.1.3 Support for the draft policies was received from five members of the public and five organisations, including English Nature and the Environment Agency.

5.1.4 A summary of the source of the responses is given overleaf on Chart 3.

5.1.5 87% of the responses came from Norfolk and Suffolk. However, responses came from 21 other English and Welsh counties. Individual responses were received from New Zealand, South Africa and Australia.

5.1.6 The greatest number of responses came from residents most likely to be affected by a change in defence policy - Overstrand (254, 10.5%) followed by Bacton (232, 9.5%), Happisburgh (185, 7.6%), Potter Heigham (177, 7.3%), Walcott (144, 5.9%) and Mundesley (131, 5.3%).

5.2 Public meetings

5.2.1 The Operating Authorities did not arrange any additional public meetings apart from the exhibitions listed in 2.4.1. However, in response to the publication of the draft plan, four public meetings were organised in Norfolk during February 2005 by Malcolm Kerby of the Coastal Concern Action Group (CCAG) in conjunction with Norman Lamb MP to "try to explain the draft shoreline management plan & its impact on the local area to the general public in layman's terms"⁶. Local Authority and Environment Agency officers were not invited to attend.

5.2.2 Subsequently, Malcolm Kerby attended another five meetings at the request of the local people.

⁵ Listed in Appendices 1 to 4

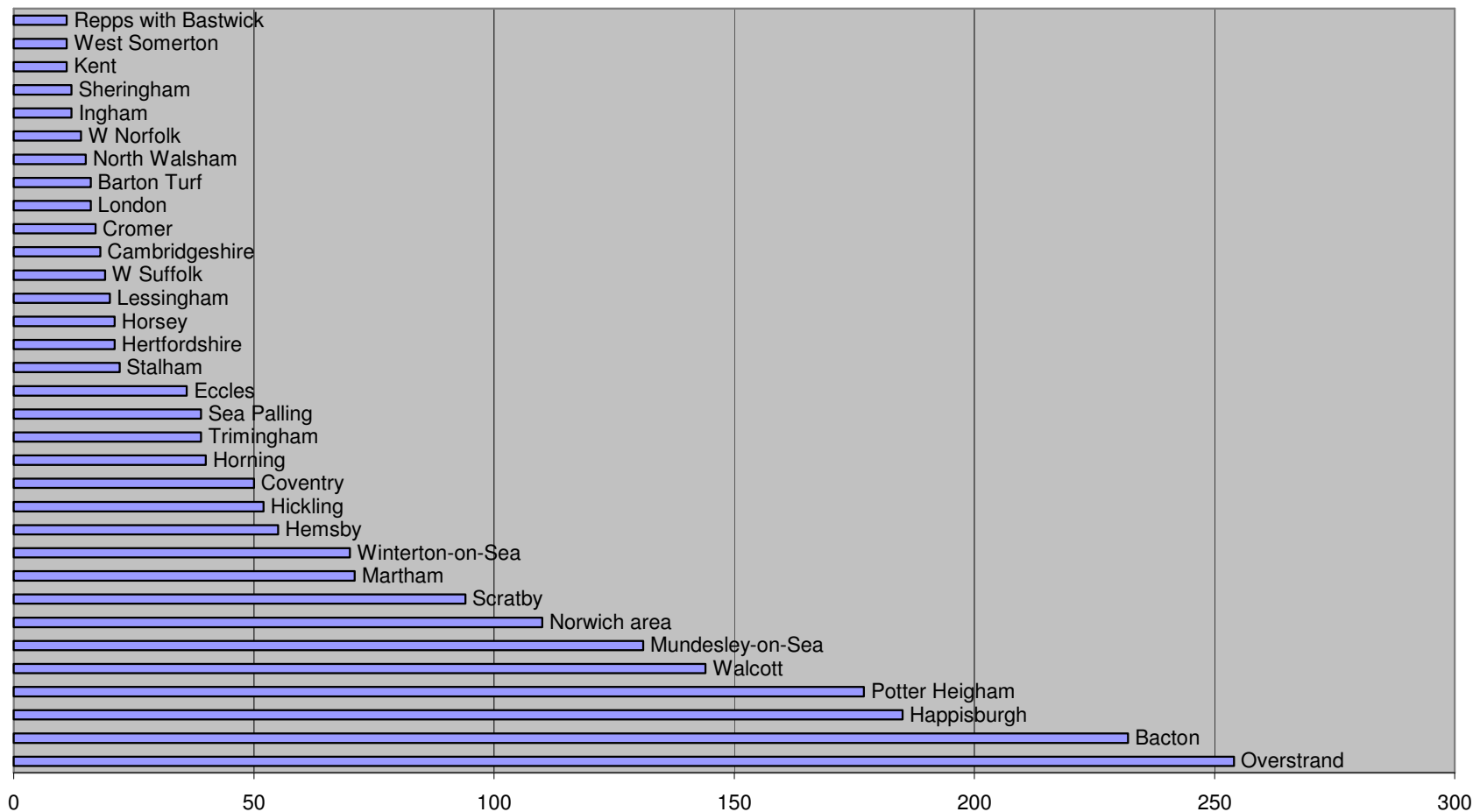
⁶ Quote taken from CCAG summary of the meetings at
www.happisburgh.org.uk/content/ccag_smp_meetings.doc

5.2.3 The following table give details of the meetings:

Date	Venue	Attendance
8 th February 2005	St. Mary's Church, Happisburgh	Approx. 200-250
10 th February 2005	Coronation Hall, Mundesley	Approx. 100-150
11 th February 2005	St Martin's Church, Overstrand	Approx 200-250
14 th February 2005	Village Church, Bacton	Approx. 120-180
tbc	Walcott	N/A
9 th March 2005	Potter Heigham	N/A
7 th April 2005	Scratby	N/A
8 th April 2005	Sea Palling	N/A
15 th April 2005	Horning	N/A

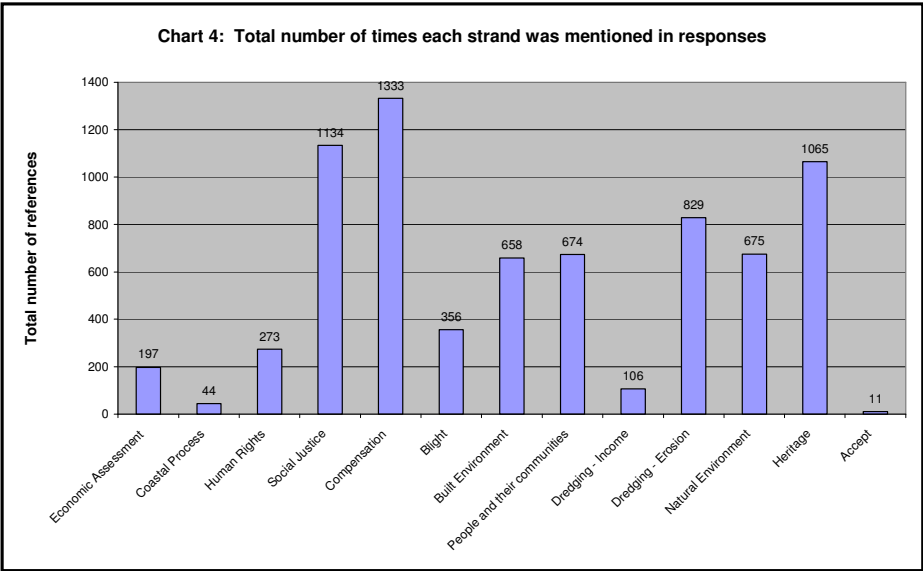
5.2.4 The meetings comprised presentations by Norman Lamb MP and Malcolm Kerby, Chairman of CCAG, and a slide presentation showing details relevant to the specific villages where the meetings were held.

5.2.5 A question and answer session followed each presentation.

Chart 3: Geographical distribution of locations sending in ten or more responses

5.3 Strands of Comment

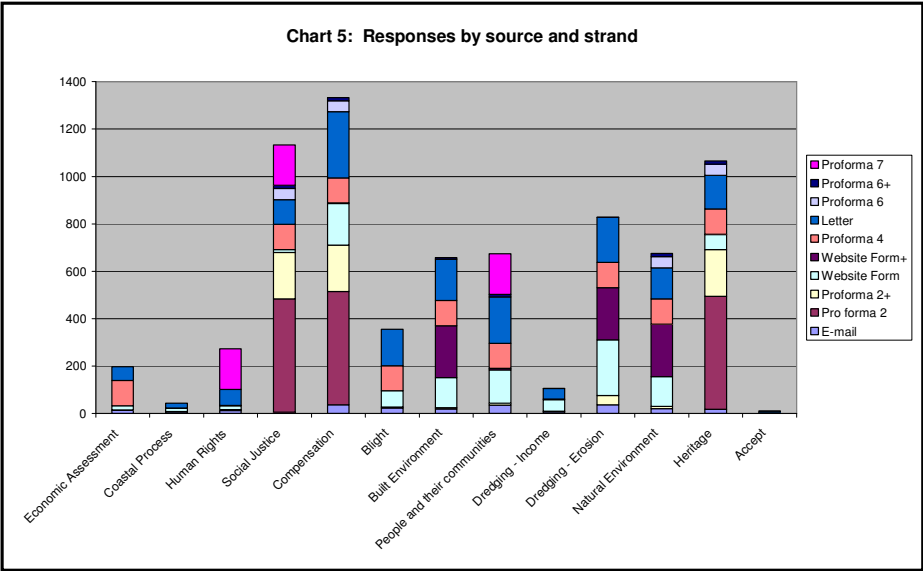
5.3.1 The comments made in each response were recorded against the twelve strands of objection and the “accept” category, referred to Section 6. These were totalled to identify the most common reason for objecting to the proposals. Chart 4 summarises the total number of times each strand was used as a reason to support an objection to the plan. The grand total is greater than the number of responses because responses commented on more than one strand.



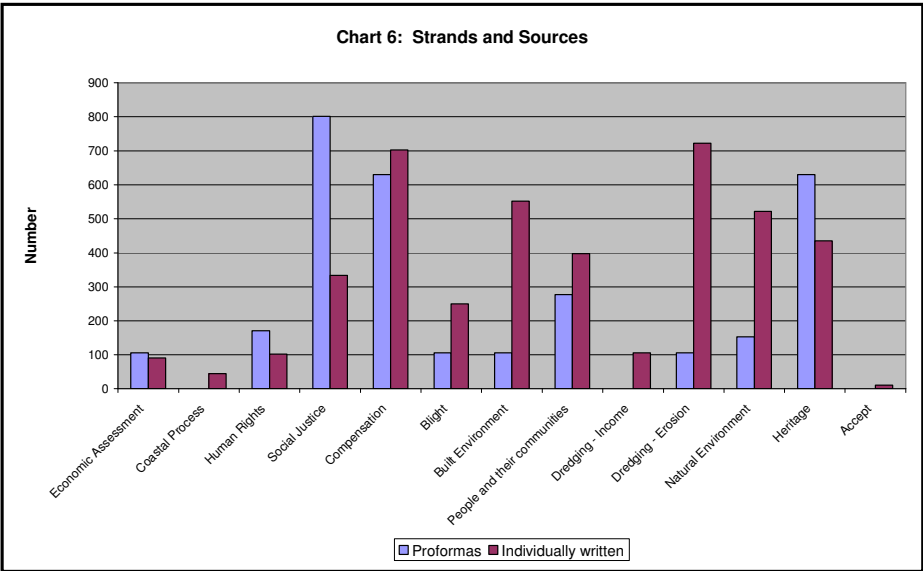
5.3.2 The strands with the highest scores are Compensation (1333), Social Justice (1134) and Heritage (1065).

5.3.3 This reflects a widely held view that it is unfair that there is no compensation to owners who are likely to lose their properties because of the new policies. Proposals to change “hold the line” policies to “managed realignment” and/or “do nothing” were regarded as unjust, particularly as consultees had received recent advice that their homes would be protected in the long-term. Residents living in cliff-top properties believe it is unreasonable to expect them to absorb the full impact of a decision not to defend cliffs whilst other people, living down the coast behind beaches and defences receiving the sediment eroded from the cliffs, benefit. The fact that the policy change could be implemented within 20 years (or one generation) is also regarded as unjust. Some elderly and retired consultees make the point that they live on a fixed low income with few savings. They say they would not be able to afford to buy another property without some compensation for the loss of their present home.

5.3.4 We noted that the pre-printed forms “weighted” the total number of responses against some of the strands and examined the degree to which this influenced the results. For instance, the peaks for social justice, compensation and heritage are related to 477 Pro-formas 2 that referred to these three issues only. Chart 5 illustrates the point.



5.3.5 A further analysis produced Chart 6. This illustrates that the objections of the authors of individual written responses were based, in the main, on four strands - the adverse impact of offshore dredging; the lack of a compensation for the loss of property; the potential impact on the built environment; the potential impact on the natural environment.



5.4 Response from Parish Councils

- 5.4.1 We received responses from 21 Parish Councils⁷. An extremely comprehensive submission came from Overstrand Parish Council, which paid particular attention to the complex process of economic appraisal. Their submission was the result of the work of a number of working parties set up within the parish to address particular issues. We received a number of e-mails seeking detailed information on the economic appraisal process, which was not always readily available. On occasions, there was a delay in providing this information, for which we apologise. Appendix 6 includes a summary of their responses.

5.5 Responses from Businesses

- 5.5.1 30 businesses responded⁸. Appendix 6 includes a summary of their responses.

5.6 Responses from Organisations

- 5.6.1 Responses were received from 34 organisations⁹ representing residents, conservationists, political groups, sports bodies and others with an interest in the area. Appendix 6 includes a summary of their responses.

5.7 Responses from Government and non-Governmental Agencies

- 5.7.1 Two operating authorities replied – Great Yarmouth Borough Council and the Environment Agency. The National Trust, English Nature, Norfolk County Council, Broads Authority and English Heritage also responded¹⁰. Appendix 6 includes a summary of their responses.

⁷ See Appendix 1

⁸ See Appendix 2

⁹ See Appendix 3

¹⁰ See Appendix 4

6 STRANDS OF RESPONSES

6.1 The analysis identified twelve strands (or reasons) for objection, which have been included in the analysis of responses. The twelve strands are, in alphabetical order, listed below.

- Blight
- Built Environment
- Coastal Processes
- Compensation
- Dredging - Erosion
- Dredging - Income
- Economic Assessment
- Heritage
- Human Rights
- Natural Environment
- People and their Environment
- Social Justice

6.2 Inevitably some points raised by consultees will span more than one strand and there are clear links between some of the strands e.g. between “Compensation” and “Social Justice”, “Natural Environment” and “Heritage”.

6.3 We have also analysed those responses that supported any of the proposals as an “Accept” category.

6.4 Blight

6.4.1 Summary: The impact of the SMP policies on property values where there is a proposed change of existing policy from “hold the line” to “management realignment” and/or “do nothing”. There is a concern that the immediate effect of the Plan will be to blight coastal areas of the Norfolk coast. Within the zone identified as being under some threat during the lifetime of the plan there is a fear that property values are being depressed leading to financial loss by owners. Consultees quote specific instances when property sales fell through, following the publication of the draft plan. They also report that some postal areas are having difficulties in arranging insurance and mortgages for their properties.

6.4.2 Examples of quotes included in responses:

“The proposed abandonment of Overstrand has already had a detrimental effect on the value of my property. The value of my children’s inheritance will slowly reduce to nothing.” (Ref. 2022).

“When we bought our house and business years ago the policy was “Hold the line”. It is totally irresponsible for Government to then change their minds and not be held to account for the collapse of the spirit of the community and render the results of years of hard work to build up a business and buy a property worthless.” (Ref. 348).

“We strongly object to the plans and are very surprised that such plans should be considered. Some postal areas are also having difficulties in arranging insurance and mortgages for their properties.” (Ref. 2028).

“...three property sales were terminated as a direct result of the SMP and nothing has sold since.” (Ref. 1695).

“The most immediate effect of the Plan will be to blight whole areas of the Norfolk coast. As existing defences disintegrate, we will lose increasingly large areas of land, along with homes, businesses, livelihoods, amenities, natural habitats and agricultural land.” (Ref. 2084).

6.5 Built environment

6.5.1 Summary: This covers the impact of the plan on the buildings, facilities and infrastructure in urban areas and villages. Consultees object to the predicted loss of a large number of houses, businesses, amenities, facilities and services. They believe that the quality of the built environment will reduce as it becomes uneconomic to maintain and improve buildings and infrastructure with only a short-term future. It is argued that the loss, through coastal erosion, of community assets, such as schools, shops, post offices, churches and village halls, will lead to the gradual decay in the quality of life and the inevitable “death” of the community. A number of respondents have been keen to point out the far-reaching effect of instances where the coastal road network is severed. They also comment on the potential fate of coastal outfalls including those from the sewage system serving the local communities.

6.5.2 Examples of quotes included in responses:

“Yet another unknown quantity is the effect of the proposed wind farms. Apparently a major feed pipe is to go through the centre of Overstrand. If Overstrand is to be left to the elements, the construction of this pipe will need to be amended.” (Ref. 156).

“..no public utility will wish to spend money maintaining plant if it will crash into the sea.” (Ref.)

“We wish the plan to be revised to protect a thriving, historic and delightful village and coastline.” (Ref. 226)

“We moved here in July 2004 to retire to the coast and within months our lives have been turned upside down with the threat of losing our home within 20 to 50 years – this has already affected the value of our home and filled us with concern and worry that these plans may well go ahead and how can we continue to live here.” (Ref. 2323).

I understand there is not even going to be any protective work or repairs to the existing groynes, breakwaters or even the promenade steps and that this gives an estimated 25-50 years lifespan to the village. I find this unbelievable and hope that the plan is scrapped and a regeneration programme adopted. (Ref. 2088).

6.6 Coastal Processes

6.6.1 Summary: Coastal processes includes sediment characteristics and transport; long-term processes; how the coast responds to tides and waves; and beaches. The current experience at Happisburgh where the cliffs have eroded at a far faster rate than forecast is often quoted as a reason to question long-term predictions for erosion in the plan. Consultees state that the erosion predicted to take place over a 20-year period by the 1992 Happisburgh coastal strategy has taken place in under ten years. This, in turn, has led to some consultees challenging the predictions for coastal erosion and sediment transport along the rest of the frontage. Some suggest that more research is needed before accurate predictions can be made and policies established. Others challenge the assertion that sediment transport is in a southerly direction. Consultees seek a range of erosion rates and assurances that the remaining defences will not be outflanked. Some respondents believe that more account should have been taken of local opinions about coastal processes rather than placing too much reliance on scientific analysis. Within this strand we have also considered comments about the past and proposed management of coastal defence structures. The notion of a continuous supply of sediment along the plan frontage from north to south is queried in some responses where the effect of the “hold the line” units is questioned – will these not interrupt this flux and, if not, why can the same protective techniques not be applied in front of all threatened towns and villages.

6.6.2 Examples of quotes included in responses:

“The defences erected some 7 years ago worked. Why not re-build them?” (Ref. 30).

“What has stuck us straight away is the failure of the Authorities to even give consideration to the most sensible course of action which is the maintenance of the present coastline It would seem the Authorities are “hell bent” on letting the sea defences collapse.....” (Ref. 276).

“The plan is already out of date, cliff erosion in some places, such as Cart Gap, has already passed the lines on the map which purport to show the predicted loss of land over the next twenty years.” (Ref. 51).

“(The plan) is based on a mixture of projections and supposition which current experience (e.g. at Happisburgh where the coastline is eroding far faster than forecast) suggests is inaccurate.” (Ref. 472).

"Erosion of local cliffs is due mainly to underground springs outfalling on the cliff face. Some serious but relatively inexpensive work could reduce erosion dramatically." (Ref. 212)

"All these developments have contributed to the changing of underground watercourses which, in their path beneath the cliffs have caused erosion on a large scale. (Ref. 356).

"It is patently obvious that the principal reason for the 'abandonment to the sea' policy is to save the cost of repairs to the established sea defences" (Ref. 299).

"There has been proof of beach migration to the south and also the reverse. The SMP seems to imply it is predominantly to the south. It is not." (Ref. 562).

"Shoreline defences are surely going to be breached in unpredictable ways, as a consequence of sudden and violent sea surges and storms, causing widespread havoc with flooding inland along river basins." (Ref. 485).

"Previous projections of rates of erosion have grossly underestimated the speed of erosion of our coastline. The plan should, as a bare minimum, have shown both minimum AND maximum possible rates of erosion for each of the time periods shown. Failure to do this shows how untrustworthy a document this is." (Ref. 649).

"Hundreds of millions of pounds are spent on river flooding defences. Homes flooded by river water can be repaired." (Ref. 953)

"In our villages we have fishermen and lifeboat men who have more knowledge of the sea and tides in their little fingers than the whole government put together." (Ref. 1004).

"What effect will the proposed harbour at Great Yarmouth have on the beaches? Surely this will disrupt the movement of sediment along the coast." (Ref. 1559).

"The SMP document gives the impression that a naturally functioning coastline (the ultimate goal of the plan) would have gradually moving sediments along the beach giving a natural barrier to high rates of erosion. But the 1953 storm event shows that the largest erosion occurs during these large and smaller storm events." (Ref. 1531).

“(The repair and reinforcement of the existing lines of defence) may itself be a relatively costly exercise, but will surely be more cost effective to do so now and avoid a logistical problem of relocating large numbers of the population to other areas or become entangled in financial settlements. With this underway, greater attention and time can be given to research into coastal erosion, ways to protect the coast and the effects of offshore dredging...” (Ref. 2039).

“The cliffs to the west (unprotected) are supposed to be depositing sand that Overstrand is stopping. Where is all this sand? Halcrow state material reaching Overstrand will be deflected offshore and lost. Halcrow’s statement is incorrect. Why hasn’t the sandbank outside the low between Cromer and Mundesley not gone east as predicted by Halcrow? Sand from Cromer will continue to protect SMP cliffs. Halcrow depend on taking sediment from the cliffs which the sea seldom reaches and where rotational slump seldom occurs. The tidal flow is too weak to divert sand offshore. Halcrow has not considered Counter flow. They appear to have no real knowledge of tidal flows in the Cromer and Overstrand areas. There is no accurate figure for sediment supply from the cliffs. (Ref. 2428)

6.7 Compensation

6.7.1 Summary: Comments concerning the lack of compensation to owners who can expect to lose their property from coastal erosion over the period of the plan, particularly when the proposed defence policy is to change with time from “hold the line” to “managed realignment” and/or “do nothing”. A number of parallels are drawn between the situation with coastal property owners and those affected by road building schemes where, it is perceived, fair financial recompense is available. The argument is sometimes linked to the view that the affected owner has to withstand the financial loss to provide a benefit for the wider community i.e. in supplying sediment for down drift beaches. The compensation issue is also linked by some to the disruption and resettlement costs likely to be incurred by displaced families. There is reference to the effect on displaced businesses and people losing their jobs.

6.7.2 Examples of quotes included in responses:

“The strategy for a managed retreat is fatally flawed, because nowhere are there any proposals for compensation for those required to lose their homes, lands and livelihoods.” (Ref. 95).

“Why am I not going to be compensated by you for deciding that I’m going to lose my main security? What gives you the right to take over my property? This is a democratic country, don’t dictate to me.” (Ref. 2042).

“This is not fair to expect people to lose their homes and receive no compensation.” (Ref. 2055)

“It is unacceptable that the generation who happens to live and own homes in coastal communities at the time the rules change, from a position of defending the coastline to one of abandonment, should lose everything. Without compensation, blight is likely to set in straightaway. A compensation scheme would give people renewed confidence to buy into and live in these schemes. Such a scheme would also force Government to assess the advantages and disadvantages of defending a specific stretch of coastline more objectively. At present, abandonment is a nil cost option.” (Ref. 1427).

“We are expected to pay with our homes and receive no compensation for the inconvenience and heartache that we are already going through.” (Ref. 1530) “Is warning given to those purchasing homes in this area that value will drop?” (Ref. 2023).

6.8 Dredging - Erosion

6.8.1 Summary: Many people believe that offshore dredging for aggregate increases the rate of erosion at the coast. They remain to be convinced by the assurances of the dredging industry and Government experts that there is no link and suggest that dredging should cease until there is more certainty and a better understanding of the inter-relationship, if it exists. Consultees believe their arguments are supported by the comment in the first paragraph on page 10 of the Consultation Document, which suggests it is uncertain that there is such a link. Whatever interpretation is put on this remark, a number of respondents believe that the plan is dismissive of the potential effect of dredging. Consultees refer to practice in other countries, particularly The Netherlands, where they believe dredging close in-shore is not permitted. The statement in the plan that the effect of dredging is uncertain is challenged by the dredging industry, which points out that the current procedures ensure no adverse effect on the coast.

6.8.2 Examples of quotes included in responses:

"...dredging should not be allowed so close into our coastline, scientists have already confirmed that dredging can be the cause of coastal erosion and have a detrimental effect on our beaches." (Ref. 10).

"It has been stated that there is no evidence that offshore dredging affects coastal erosion.....Surely common sense dictates that this is being achieved by the sediment being taken out by the dredger being replaced with sediment from elsewhere. Before any credible SMP is presented there must be more research into this" (Ref. 784).

"The SMP effectively dismisses the concern over the impact of offshore dredging on coastal erosion in one small sentence "the effects of offshore dredging are uncertain". It cannot be right that a plan is formulated which will condemn rural coastal communities, and ultimately huge inland areas of North Norfolk, to the sea when a major potential factor such as dredging is not understood and has an uncertain effect!" (Ref. 2335).

"Seems completely wrong to continue to grant licences for dredging marine aggregate from the sea when the effect of dredging on coastal erosion is uncertain and it may be that dredging and erosion have an interrelationship not fully understood. (Ref. 2076).

"The Dutch authorities have already banned dredging close to their shoreand the same ruling should apply here." (Ref. 10).

6.9 Dredging - Income

6.9.1 Summary: Consultees are aware that the Government receives income from the sale of marine dredged aggregate. They also believe that much of the marine dredged aggregate is exported to mainland Europe. Linking this to the general belief that dredging does increase problems at the coast, they demand that the income should be used to fund coastal defence schemes. There is also concern about the perceived conflicts of interest on the part of the organisations involved in the dredging/aggregate industry and coastal management.

6.9.2 Examples of quotes included in responses:

"Why is the Government selling our sea-bed to Holland for their sea defence work?" (Ref. 1695.)

"The crown/government is happy to make large sums from dredging close off the east coast, but it ignores its implications." (Ref. 2014).

"At a local meeting.....it was also pointed out to us the connection between people concerned with this plan and the company which is licensed to dredge off our coastline and sell to other countries." (Ref. 406).

"What contribution to coastal defences are both the dredging companies and the Crown Estates, who take their licence money, making to the costs of damage caused by their actions?" (Ref. 1530).

6.10 Economics

6.10.1 Summary: Comments on the perceived inadequacy of the economic appraisal process that compares the costs of defending the coastline with the benefits achieved from undertaking the defence works. Consultees refer to Appendix H3.1.1 which states “Losses and benefits have been calculated only upon the basis of residential and commercial property values. Other assets, such as utilities, highways, and intangibles, such as recreation, impacts upon the local economy and environment, have not been valued or included. Exclusion of these factors will robustly confirm economic viability, as these would provide added value.” Consultees believe that inclusion of the items excluded from the appraisal could justify maintaining existing defences. Others question the accuracy of and method of determining the property valuations and the absence of the value of tourism to the area. Some consultees challenge the base information used in the analysis e.g. the classification of Overstrand as a residential area without considering its tourism importance and the economic activity associated with some of the buildings from which businesses are run. The way in which central Government allocates funds is also challenged. This is manifest in a number of aspects – the disproportionate allocation between East Anglia and the South coast, between inland areas subject to river flooding and the coast and between coastal defence and other Government responsibilities such as overseas aid

6.10.2 Examples of quotes included in responses:

“(In the cost benefit analysis) no allowance has been made for the reconstruction of highways lost to the sea; the replacement of electricity transformers, gas and water mains; schools, village halls etc.” (Ref. 377).

“The costing of the plan is severely flawed in that it does not allow for the economic effect on the area.” (Ref. 473).

“The SMP’s estimate of the value of property lost during the period if the defences are abandoned is £7.7m. I do not consider this to be accurate, but believe the value of property and amenities to be more in the region of the figure in an earlier report in 2004, some £57.9m” (Ref. 1436).

“There has been no proper assessment of the costs of abandonment, ... losses and benefits have been calculated only upon the basis of residential and commercial property values. Other assets, such as utilities, highways and intangibleshave not been valued or included.” (Ref. 1530).

“..the document acknowledges “losses and benefits have been calculated only on the basis of residential and commercial property values. Other assets, such as utilities, and highways, and intangibles such as recreation, impacts on the local economy or environment have not been valued or included.” How can such an important decision be made when we have no idea of the true financial cost to the area?” (Ref. 2037).

“I also understand that the finance for today’s spending on defences is determined in London and not locally, does local opinion for local people not matter any more – obviously not.” (Ref .567).

“I believe that the residents of East Anglia are being discriminated against and that there are other ways to deal with this problem. After all coastal protection is being provided in other areas in the south of England and I am horrified that a government I voted for is effectively telling me and my fellow residents that we just don’t count.” (Ref. 1024).

“ .. cash is available to defend certain land and property - £155M for homes falling into Combe Down Mines; £6M to save Southwold; £12M for tunnelling under Epping Forest to save a cricket pitch.” (Ref.1415).

“The economics section of their (the consultants) report is not only flimsy but also wholly misleading.My conclusion is that other and independent consultants should be engaged with the relevant technical competence to conduct a formal cost benefit appraisal.... This aspect of the report should be rejected out of hand and no decision taken until the economic facts are properly presented.” (Ref .1510).

“Whilst it is virtually impossible for small rural communities to qualify for aid under this (Defra) system, it nevertheless exists and a chance is therefore available. If the proposed SMP is accepted then those areas which are defined under the heading of “no active intervention” will remain so and even the slim chance of help currently available will be signed away” (Ref 2335).

“The SMP is a narrowly focussed technical response to the coastal erosion problem. It does not take into account the financial and social consequences of its recommendations or even suggest how others might address these issues. The “plan” is therefore incomplete and unbalanced and should not, in my opinion, have been presented in this form for consultation/approval” (Ref.1525).

“....all along this coastline people depend on the tourists for their living, and to support their families.....Richard Caborn MP on Anglia Television

March 29th said how much he wanted to encourage more tourists to come to East Anglia" (Ref. 1584).

We find it hard to believe the organisations involved in recommending the plans can justify to not only abandon a village the size of Overstrand but also numerous other villages along the coast causing untold misery to so many people." (Ref. 1572).

"Just the proposal of this plan has caused enormous worry to many residents....already impacting on the whole livelihood of the area. There are many questions left unanswered (including) "What help would there be if residents, farmers and businesses are affected?" (Ref. 913).

6.11 Heritage

6.11.1 Summary: The impact on the heritage and history of the area, which would be lost forever if defences are removed and/or not maintained in place. Particular reference is made to the potential loss of unique historic buildings such as 17th and 18th Century houses in Norfolk, the Lutyens buildings in Overstrand and the churches, including those at Mundesley, Trimingham and Happisburgh, which are under some threat. The heritage value of the buildings and landscape of the Broads is often mentioned.

6.11.2 Examples of quotes included in responses:

"The heritage and history of (Overstrand) would be lost forever. Overstrand provides many jobs, and the tourism which is brought to N Norfolk thorough Poppyland, Lutyens buildings and the history connected with Sir Winston Churchill, is immeasurable." (Ref. 1429).

"Historic buildings at risk will require recording as base-line mitigation, perhaps in some cases followed by dismantling and relocation. All these forms of mitigation require funding which cannot be obtained from local authority sources" (Ref. 943).

"The coastline and lands of Norfolk are a legacy we have inherited from our forefathers and as such should be protected and cherished into the future." (Ref. 1532).

6.12 Human Rights

6.12.1 Summary: The policies are regarded as short sighted and badly constructed. People believe an arbitrary change in policy from defending a coastline to not defending the coastline an abuse of human rights insofar as it affects their “right” to live where they chose. People who have recently been given consent to develop new cliff-top properties object that they are now being told that their land is under threat of erosion. Others point out that they bought property on the understanding that defences would be maintained indefinitely. Many people believe there is a national obligation to provide protection to the community and their property and that they have a basic human right to live in peace and security. In some cases, they have reinforced this view by reference to the European Union legislation on Human Rights.

6.12.2 Examples of quotes included in responses:

“Government has a responsibility to defend the realm and protect its people and ensure that any burdens of loss are shared equitable. Failure to do so clearly breaches Article 8 of the European Convention on Human Rights (as incorporated into the Human Rights Act 1998) which states ‘Everyone has the right to respect for his private and family life, his home and his correspondence’” (Ref. 874).

“Your plan needs to be reviewed and human rights taken into consideration. Nature and people can live together to maintain an equilibrium to save both our environments.” (Ref. 2042).

“I am entitled to live where I choose – but it is not unreasonable to expect security for my home, or is that another thing which becomes part of the post code lottery? Under the proposed scheme our security is withdrawn; our citizen rights are denied.” (Ref. 422).

“The people of Overstrand have every right to demand that their village is protected as much as possible at all times and in every way possible” (Ref.1178).

“I have a basic human right to live in quiet, peace and enjoyment. The buildings will deteriorate. Already abandoned buildings are in decline and this may cause vandalism and decline.” (Ref. 1715).

6.13 Natural Environment

6.13.1 Summary: Objections to policies that may result in the flooding from the sea of the Broads and the subsequent loss of the freshwater areas and habitats. The consequent impact on the economy of the area from the loss of income from tourism, which supports the costs of managing the natural environment. Under this heading we have also considered comments made about the impact on the landscape and Areas of Outstanding Natural Beauty in particular.

6.13.2 Examples of quotes included in responses:

"The ...fresh water areas are vitally important to the unique wildlife that inhabits this area in particular the bittern and otters which have only recently started breeding." (Ref. 966).

"Permanent flooding would mean the loss of agricultural land, wildlife and tourism but temporary flooding and salt penetration could also mean serious damage to the Broadland environment." (Ref. 789).

"Why has Halcrow dismissed turbidity and smothering? Why are the important breeding and nursery fish areas not considered?" (Ref. 2428)

6.14 People and their Communities

6.14.1 Summary: There is a belief that the plan takes little or no account of the adverse effects of the medium and long-term effects on people. People state that their health is suffering because of worry and concern about the proposed policies. Those who have moved to the area make the point that their properties represent a life's work that was expected to offer security in retirement and allow them to pass on an inheritance to their children. Elderly consultees make the point that their pension represents their only income and that it could not fund the purchase of another property. It is anticipated by consultees that blight will prevent people moving out of the area and discourage people from moving in. As a result, the average age of the population is likely to increase. This will threaten the survival of schools and other community facilities. We have also included in this strand the expressed views of people about the consultation process itself.

6.14.2 Examples of quotes included in responses:

"But even more important – what happens to the displaced population? Where are 200,000 – 250,000 displaced persons going to be re-housed? Where are they going to find employment? Who is going to fund relocation expenses?" (Ref. 859).

"The plan has not taken into account the true cost to the village.....There is quite a number of elderly, but independent, residents who under the proposed SMP would have to be re-housed – a burden on the state, something they had worked all their lives to avoid. " (Ref. 1850).

"Furthermore there have been no socio-economic factors taken into account. We are talking about a substantial number of people, a lot of whom are retired and/or elderly whose lives will be effectively ruined with attendant emotional upset and trauma, in the face of such a lack of understanding" (Ref. 781).

"The SMP has caused great anxiety and distress in the village (Overstrand). People feel abandoned and worthless, as their properties plummeted in value overnight." (Ref. 1695).

"Just the proposal of this plan has caused enormous worry to many residents....already impacting on the whole livelihood of the area. There are many questions left unanswered (including) "What help would there be if residents, farmers and businesses are affected?" (Ref. 913).

"Previously, construction has taken place on the understanding that sea defences would be maintained (such as at Happisburgh). I believe there is such an obligation in the Coast Protection Act 1949." (Ref. 843).

"Our little café on the top of the cliff is a famous watering hole for...people that walk the path from Cromer.....We employ twelve people. These jobs and many more in the village will be lost. Please re-think your plan." (Ref. 2017).

"I am horrified to learn of the proposed Shoreline Management Plan. It is flawed by a major lack of consultation leading to major inaccuracies regarding tourism, historical significance, environmental and economic issues." (Ref. 1214).

"You show a disturbing ignorance in relation to a number of important aspects relating to Overstrand. This is obviously caused by your offensive non-consultation with Overstrand. We had no representation on the planning group and I would question your competence in running this review." (Ref. 129).

"The whole process of consultation has been handled extraordinarily badly. If the local action group had not drawn my attention to this I would not have been aware of the proposals. For proposals like this, which affect the future of our community, we have the right to be consulted proactively rather than reactively." (Ref. 1109).

"I object to the blatant discrimination against human beings in favour of birdlife." (Ref. 2425).

"In 2001 my sister and I purchased a property in Trimingham after notification from NNDC that the coastline on which our home is located fell into the "maintain the line" category of coastal defences. However, your preferred option for my cottage is to become settlement (sediment?) for the beaches lower down the coastline, so is it any wonder that my stress levels are now increased and that, having been medication free for over a year, I now have to realise there is every probability of having to return to prescription drugs." (Ref. 107).

"What about the stress and anxiety caused by devaluing my property, which I saved for and hoped to use to finance looking after myself when I'm old, rather than burden the country?" (Ref. 2428).

6.15 Social Justice

6.15.1 Summary: This strand includes issues whereby consultees feel that “fairness” has not been applied when developing the draft policies. In the main, this involves properties and land that was previously protected through defences now to be lost. Those who have retired and moved to the area make the point that their properties represent their life's work and savings and that the loss of the property is poor reward for those who have contributed so much to society including fighting in the last war etc. They believe it unjust and unfair that an “arbitrary” change in policy can lead to the loss of their cliff-top properties that were bought on the understanding that defences would be maintained. This contradicts their belief that it is a perceived national obligation to provide protection to the community and their property. Others question why should they should suffer loss of their property and assets for the benefit of others – they refer to the scenario whereby material from eroding cliffs is deposited on adjacent beaches and offers protection to other communities.

6.15.2 Examples of quotes included in responses:

“ residents who have purchased property in good faith, only to have its value drastically cut by government action.” (Ref. 1502).

“It seems ludicrous to me that I, and any others like me, am expected to sacrifice my home for the good of the nation when beaches further down the coast line are already suffering the effects of coastal erosion.” (Ref. 107).

“Why has planning permission been granted and still being granted by North Norfolk District Council in the proposed Overstrand risk areas?” (Ref. 1506).

“.....are you aware that an entire development of 23 new homes have been built within the last 2 years, including 4 whose building curtilage extends to just 50 metres from the cliff edge!” (Ref. 324).

“When my wife and I bought our property we were assured that our shoreline would be maintained.” (Ref. 1186)

“It appears that developers have gained permission from the Deputy Prime Minister's Office after refusal from the District Council. Now we learn they are to be abandoned to the sea.” (Ref. 395).

"We purchased our property (newly built) in 2002 after checking with North Norfolk District Council that the property was not under threat from erosion. We now learn...that Trimingham's coastline will no longer be defended." (Ref. 1223).

"We put our life savings into our home (in Overstrand). The news about the Shoreline Management Committee's proposals to withdraw their continued support has come as a devastating blow to us and is totally unacceptable." (Ref. 1513).

"I bought my bungalow three years ago for my retirement and to enjoy and support local community and its way of life here in Norfolk. We are going to loose our home and all I have worked for over the past 42 years f my working life." (Ref. 1637).

"I purchased my bungalow in Overstrand facing the sea as my permanent home to retire. When buying I had no reason to believe the "hold the line" adopted by NNDC would be changed." (Ref. 1715).

"Sea defences were in place when we bought the property and having such defences to be allowed to crumble was never even considered in anyone's worst nightmares!" (Ref. 2014).

"We bought two years ago on understanding the policy was then and would always be hold the line." (Ref. 2017).

"I bought my house ... knowing that a hard defence was at the bottom of the cliff." (Ref. 2042) "My father fought in World War II and my grandfather died in World War I. I am appalled that that our land and homes should be given up after such sacrifice because of inaction by government." (Ref. 2425).

Money is always found for wars, animals, birds, overseas help, young unemployed who have not paid a penny into the system, yet older people who have served their country in war or the younger retired, who have worked and saved for their need in old age, find that they are to be abandoned alongside their village." (Ref. 1429).

"When people have spent their whole lives looking after their homes and businesses what right has the Government to say...we'll let you fall into the sea?" (Ref. 1004).

“our dream was to retire to the coast and enjoy entertaining our respective families in this beautiful part of North Norfolk....In one foul (sic) swoop you have destroyed all our hopes and aspirations” (Ref. 1185).

“Now we are feeling very sad and disappointed that the money we have invested in this property, and the thousands of pounds we have spent in renovating this property, has all been for nothing.” (Ref. 1698).

“We did not work hard and use our life savings (including pension provisions) to buy our house and just accept that nothing can or should be done to save it.” (Ref. 2018).

My parents have always told us that we will inherit the house ...if there is a house still standing we will not be able to sell it!” (Ref. 2055).

“..this (the tsunami) was a devastating tragedy...but would it not have been better for some of the Government’s millions to have been put into our own sea defences.” (Ref. 1178).

“The people of Overstrand.....have been treated unjustly, discriminated against and treated unfairly by inadequate consultation that failed to provide equal opportunity to all communities and organisations.” (Ref 1506).

“..to switch from hold the line to allowing the coastline to retreat naturally without an interim stage is not socially acceptable.” (Ref. 2060).

6.16 Accept

- 6.16.1 Summary: Consultees were asked if they supported the any of draft policies for the management of the coastline. Support is offered by organisations seeking sustainable management of the coastline. They wish to see it managed so that it can respond the natural and climate change-related processes. Individuals offer support for the policies on a local basis.

"We welcome the SMP "as a useful base for the future sustainable management of the Kelling to Lowestoft Ness coastline. We note the importance of the cliffs of the Norfolk coast as an international nature conservation area of importance and that the flora and fauna of the area is reliant on the continued natural erosion of the cliffs to maintain a suitable habitat. We feel that the SMP is flexible enough to take full account of environmental, social and economic factors....whilst clearly setting out the long-term management options for the coast" (Ref. 1108).

"I accept the policy for the shoreline because I realise that there will come a time when Waveney DC cannot justify maintenance of the revetment below my land. Would I be allowed to undertake maintenance work myself?" (Ref. 325).

"Local policies (Corton area) are acceptable. We recognise the 20 to 30 year-life of the Corton defences and that these are not renewable afterwards." (Ref. 326).

"Policies are acceptable. Understand the issues. Realise that the current policy for Corton will not be able to be continued after the defences fail." (Ref. 327).

"Policies are acceptable. I am concerned at the way property owners in "the Marrams" have done various excavations in the dunes. This can't help. (Ref. 1645).

"I support the plan in general and the guiding principles as an essential framework for the plan. Technically the plan is realistic and based on sound thinking. Although this leads to serious implications for the longer term future of property, settlements and facilities on the coast." (Ref. 2105).

APPENDIX 1**List of Parish Councils responding**

Name	Summary of response
Bacton Parish Council	Proforma 2
Beeston Regis Parish Council	The coast depicted in the plan is unacceptable and as such, the Plan is unacceptable to the Parish Council.
Belton with Browston Parish Council	Strongly object to the document in its present form. Concerned about management realignment and impact on villages from N Caister to Hopton.
Hemsby Parish Council	Implications for the loss of property in the Parish mean that Councillors cannot accept the SMP. Supported by a petition rejecting the SMP due to: loss of property, business, holiday trade, agricultural land, wildlife and conservation areas, impact on the Broads and that there is no compensation.
Hickling Parish Council	The Parish Council rejects the SMP because of its devastating effect on people, landscape, and ecology of the area. Plus the loss of Wetland habitat. Also, could the EA take onboard the concern about dredging on fish stocks and coastline and explain better the DEFRA funding rules.
Hopton Parish Council	Effects of North Sea dredging on the coastline; Explain full effects of global warming; Consult with the Netherlands on wind farms, dredging, methods of defence. More positive about time scale of changes; identify the areas most likely to expect drastic change

Name	Summary of response
Horning Parish Council	Policies unacceptable. The losses and benefits have not been fully calculated. Impact of dredging needs reviewing. Cannot let nature eat away at our shores because impact on coast and inland would be catastrophic.
Lessingham Parish Council	A more gradual approach to the change from hold the line to natural retreat with intermediate stages. A graded rate of less intervention. Investigation of a system of compensation. One umbrella organisation to manage the entire coastline. Integrate the SMP with the Broadland Flood Alleviation Project. Research into offshore dredging.
Martham Parish Council	Reject the SMP because too many uncertainties. Looking for more research into dune systems, tidal drift and offshore dredging. No account of the "real" costs of managed retreat. "Gloss over" the impact on the Broads. Until research completed they expect the hold the line policy and the "line" to be defined.
Mautby Parish Council	The Parish Council agreed no decision on the SMP until "costs and assessments" have been carried out.
Mundesley on Sea Parish Council	Proforma 2
Ormsby St Margaret, Scratby Parish Council	The Parish Council feel that little account has been taken of "very local conditions". They also feel that the plan is "uncosted" and look for compensation for property owners who are being abandoned.
Overstrand Parish Council	Detailed response to be analysed by Halcrow Group
Potter Heigham Parish Council	Impact on "the most important wetland in Britain" as well as requesting compensation scheme and the short-term research "whose forecasts are already being shown to be unreliable"

Name	Summary of response
Repps-with-Bastwick Parish Council	Rejects the SMP for planned retreat. Population penalised by property and insurance values, false time-scales on predicting future events, lack of dredging the river system will be unable to deal with the dispersal of flood waters, there does not appear to be an alternative plan and finally the continued extraction of aggregate should be curtailed until independent survey done.
Sea Palling & Waxham Parish Council	Totally objects to plan.
Sidestrand Parish Council	Following the amalgamation of coast protection and inland waterways flood relief budget, the coast is loosing out to inland areas. Alternatives not considered in depth or given equal analysis.
Somerton Parish Council	Compares some of the SMP issues with the Coastal Habitat Management Plan produced in January 2003 i.e. short-term data and data could be unreliable. Looking for: regular newsletters from the Environment Agency, Independent investigation regarding dredging, EA to be responsible for the whole coastline, better explanation of DEFRA funding allocation.
Stokesby with Herringby Parish Council	The Parish Council agreed no decision on the SMP until "costs and assessments" have been carried out.
Trimingham Parish Council	Proforma 2
Trunch Parish Council	It is totally unacceptable to abandon this stretch of coastline without compensation. Defending towns will be useless without preserving the infrastructure. The loss would be greater than anticipated. It is a short-term plan to save money. Slow retreat may be inevitable but compensation must be paid.

APPENDIX 2**List of businesses responding**

Name	Summary of response
Aylett & Associates(Consulting Engineers (Electrical, Energy and Safety))	Identifies that no consideration has been given to water depth, and the feasibility of maintaining, supplementing or prevention of erosion scour patterns. Suggests that the solution is to maintain a smooth coastline "keeping the long-shore twice daily flows in a channel between the smooth channel between the defended and supplemented beaches and cliffs and the offshore banks typified by the Scroby and similar banks two miles off".
Beach Rock Leisure Limited	Objects as residents and business owners. More scare mongering for coastal residents effects property prices. Flooding issues causes great distress for people. If Government can spend millions fighting war, why can it not afford a few million for E Anglia?
British Marine Aggregate Producers Association	Worried that the draft SMP has "further reinforced" the perceived link between dredging and erosion along the coast. The SMP does not accurately report the current position. "At no stage...has any further approach been made to the directly to industry for further information". As well as the Southern North Sea Sediment Transport Study, there are Coastal Impact Studies. These could be made available but insistence is placed on them being preceded by a technical briefing. Reference also to the Broads Research Advisory Panel seminar on 18/11/04. In essence, the uncertainty from the SMP is thought to be unhelpful. Large amounts of data available re monitoring the seabed. Would like to meet Halcrow to discuss and clarify which would better inform the public of the role of marine dredging.

Name	Summary of response
Burnley Group Partnership	Believe that the policy of hold the line should be maintained for 50 years to enable proper evaluation to be made of the options and consequences of retreat. Compensation is a matter of equity, as a change of policy would impact unfavourably on those who acted prior to the change. The Broads is a World Heritage Site and their salination would lead to a great range of flora and fauna. Debate about offshore dredging need to be resolved especially as the Dutch, for example, do not dredge. A possible solution is provided by advance alignment by soft defences out from the existing shoreline. The costs of this approach need to be considered
Buskell Engineering	Proforma 2
C S Gray Builders Ltd, & Holiday Properties Mundesley Ltd	Argues that a true hold the line would mean defences repaired if they failed - this is not what the plan says. Compensation for people and businesses or replacement homes or businesses. The plan is "fatally flawed" because it underestimates the rate of erosion, does not account for the cost of infrastructure and is misleading as to the impact of erosion where an Erosion Report last year concluded that there was a link to coastal erosion.
Castaways Holiday Park	Economic impact on business and compensation
Cliff Top Café	Petition signed by 480 people
Coastal Concerns Ltd	Request for an extension of time to reply - granted
Customised Phone Covers	Mr Manners thinks that "the Council" should have written to every domestic and business premise in the affected area.
DLA Town Planning Limited	An independent body to analyse the report and present its findings. Suggests that the continued maintenance of the existing sea defences is economically viable. Also co-operation between industry and local councils, compensation, reconsideration of dredging.

Name	Summary of response
Eastwood Whelpton Limited	The Broads is an internationally famous area for training young sailors. Nelson learnt to sail on the Norfolk Broads. The Broads are a "unique and safe haven for young sailors".
F W Smith, Builders	Recently built a bungalow affected by pla. Plan would create hardship, blight, unemployment, and loss of heritage. Property values have been underestimated.
George Smith & Sons	Strongly objects to proposals to allow thousands of acres of beautiful coastline to be lost to the sea.
Haines Marine	The employment in Catfield, somewhat inland from the coast but not isolated from the impact of the SMP, has a number of factories employing over 300 people. Haines Marine is looking for a cost effective way to stop erosion, stopping dredging, producing coastal reefs and compensating residents. Also, publish the conclusions of worldwide research on seabed dredging. Joined up thinking between DEFRA and Environment Agency is necessary. More information should be given to the public.
Hanson Aggregates Marine Limited	Denies the "uncertain" conclusion of the SMP and looks for the statement to be removed. Hanson have data they will share as part of the most rigorous dredging assessments carried out anywhere in the world.
Happisburgh Estates	Issues should be embraced as a regional problem. Compensation for "those who these proposals choose to place at a total loss of all they have worked and saved for"
Horsey Estate	Mr Buxton's life's work has been managing the estate and seeing the wild life enhanced. There is a formal arrangement between the Estate and the National Trust. Mr Buxton witnessed the 1938 sea flood as a boy of ten years old "and it was a dramatic scene at Horsey and beyond. Many people, past and present, would be shocked to see suggestions that the defences put in place in 1938 were in vain".

Name	Summary of response
HR Wallingford (Dr A Brampton)	<p>I believe that this draft version of the SMP has unnecessarily given credence to locally held views regarding the alleged consequences on the coastline of offshore aggregate dredging by stating the effects of this dredging are “uncertain”. I see no justification within this document for such a statement from scientific or engineering viewpoints. While I appreciate the strength of feeling in some communities about this issue, and hence the pressure that Halcrow must have felt when addressing it, I am most surprised by their conclusion.</p> <p>If Halcrow, in their professional opinion, feels that the many previous studies into the effects on the coastline of offshore dredging have not been sufficient to rule out such adverse effects, then that opinion should be explained, ideally demonstrating and quantifying the mechanisms by which such dredging might damage the coastline. This is the more important given the large amount of dredging that has been necessary to provide beach sediments for the coastline between Sea Palling and Winterton in recent years, a recharge scheme for which I believe Halcrow are the consultants appointed by the Environment Agency. Has this “uncertainty” been previously mentioned in their appraisal of the effects of that dredging on other stretches of coastline, for example?</p> <p>Notwithstanding the many studies into the effects of offshore dredging that have concluded the present “checks and balances” are sufficient to ensure no adverse effect on the coast, we are still open to counter-arguments based on sound science, and have ourselves suggested independent reviews of both the studies and the dredging itself (see conclusions of the SNS2 study). It is regrettable that Halcrow has not added anything positive to this debate in preparing this SMP, but have presented an unsubstantiated conclusion that could be easily regarded as a weak reaction to public opinion rather than a professional assessment.</p>

Name	Summary of response
Ivy Farm Holiday Park	Tourism and visitors generate £1.9 billion each year in Norfolk with some 4.6 million visitors. Shocked, stunned, and find it unbelievable that to think anybody has the right to decide our future. We have offered help to Tsunami victims and rightly so. We could save our coastline before it becomes a disaster. Fourth generation owners hoping tradition would continue. Have improved park at considerable cost and achieved awards. Now expected to sit back while our heritage, homes, village and way of life disappear over cliff to rejuvenate other beaches and wildlife areas. Government funds must be made available to continue to protect coastline.
Landmark Landscape Consultants	Childhood spent in Overstrand. Formative years in a place thick with accent, history, weathered flint walls and occupied by people of substance. Must find resources to preserve Overstrand.
Norfolk Holiday Cottages Association	Notes of an Association meeting look for compensation for business and homeowners. Offers some observation about how the compensation may be calculated. Further observation about the need to protect Overstrand, and Mundesley.
PK Consultancy	Proforma 6
Riverside Estate	Plan unacceptable because it leads to loss of so many villages and so much freshwater habitat. With real threat to Broads. How can the sea level rise be predicted for 100 years when global dimming is now identified? Allow offshore wind farms to generate income. Offshore banks should not be dredged.
S W Chapman & Partners	Proforma 3+
Thurne Bungalow Management Co Ltd	Proforma 3+

Name	Summary of response
The Area Partnership	Accept it is unrealistic to hold the line. Acknowledge the difficulties in preparing the plan, but it raises rather than resolves issues. No reference is made to people or businesses and there is no compensation having a "democratic deficit from inception". Offshore dredging has not been proved not to be exacerbating the situation. Even if rejected by NNDC the present Defend the line is seriously under funded because of the allocation of available funds to river flooding schemes. Noted that many of the areas affected by this plan are in areas of high social and economic deprivation.
The Manor Hotel	Reliability of plan timetable, little known about the impact of dredging, full compensation for affected parties. Also, asks where people will be relocated and looks for compensation for the stress involved and what solutions regarding at risk graveyards.
Thurne Bungalow Management Co Ltd	Proforma 3+
W L Ritchie & Partner	Proforma 6

APPENDIX 3**List of organisations responding**

Name	Summary of response
Bacton Sea View Association	<p>Overview: SMP is "a well considered and thought provoking document". Impact of the problem and the consequences of action or inaction require that this be dealt with at the highest level. The plan must be clearly understood and not "tarnished by the shadows of uncertainty or expediency". Once agreed there must be commitment to the strategy. Part 1: Questions about the communication and consultation process which undermines the validity of the consultation process. Compensation would deliver an acceptable strategy and the cost benefit analysis must represent these costs. Dredging and its impact on the coast is of considerable concern and the SMP does not do enough to address the issue-urgent action from a publicly accountable body to research this area is needed. Managed retreat/realignment cannot be done for free. The background papers offer little in the way of evidence of the funding available. Financial evaluations appear "thin" and superficial. The SMP may be a high-level document but the implications are very much ground level. Some concern about a 60% optimism bias. Finally, in part 1 the group are looking for a rationalisation of the diverse range of groups who currently share responsibility for strategic development and execution of flood and coastline defence. Part 2: Compares statements from the 1996 SMP and the 2004 SMP and contrasts the difficulty the public would have reconciling the two. Bacton to Walcott area is dealt with in some detail calling into question the impact of the amount of useful sediment from the low cliffs released by erosion. Particular attention to groyne maintenance and useful life. The group also look for, in this Part, a detailed cost Benefit analysis for the area of Bacton to Walcott before any plan is adopted. In particular, it is concerned about beach nourishment in the first epoch which will be abandoned as Bacton, Ostend and Walcott are abandoned.</p>
Beach Close Residents Association	"Badly thought out" plan. "Decision not to contribute to our coast maintenance policy"

Name	Summary of response
British Dragonfly Society	Concern that over time saline deposits will replace freshwater in the Broads. Concern over phrases used regarding timing. The Broads are SAC, NNR and a wealth of SSSI and it is important to protect this national and internationally recognised area. Dragonflies require slow moving freshwater in which to breed and a change to saline conditions would be bad. Example used of the Norfolk Hawker. Need to recreate in advance of any loss a compensatory habitat.
British Reed Growers' Assoc	Particularly the Happisburgh to Winterton section. Approve hold the line for 50 years whilst alternatives are researched because reed beds take 10 years to come to maturity but concerned that the retreat the line in other areas means reed beds lost before such retreat by not being maintained. Allied to this is the local skills base that would be threatened too.
Buglife, The Invertebrate Conservation Trust	Buglife welcomes the SMP "as a useful base for the future sustainable management of the Kelling to Lowestoft Ness coastline. Buglife notes the importance of the cliffs of the Norfolk coast as an international nature conservation area of importance. Further, it notes that the flora and fauna of the area is reliant on the continued natural erosion of the cliffs to maintain a suitable habitat. "We feel that the SMP is flexible enough to take full account of environmental, social and economic factors....whilst clearly setting out the long-term management options for the coast" (www.buglife.org.uk)
Clifton Park Residents Association	The proposals are not costed properly. Infrastructure costs not included. Impact on the environment and on the local economy not assessed. Need to integrate The East of England Plan and the impact of global warming. Social costs associated with blight on property values. Compensation scheme required. Moratorium on building in coastal areas. No information on how people should lobby for change to the plan. Moratorium on dredging until full study done. Move to a national SMP to give consistency.
Coastline Village Residents Association	The Association feel that the plan is drawn up on purely an economic basis with "little or no thought given to small communities, individuals who live in those communities, the property and land these individuals own and their well being if they have to move house".

Name	Summary of response
Council for National Parks	Welcome for the in depth consideration to the effects the proposals will have on the Broads Authority area. It is important that the significance of the various protections and recognitions of the area are fully weighted so that funds can be released for the EA to recharge beaches. The organisation sees managed realignment as the most sustainable solution for the area but concedes that hold the line is necessary in the short term. Finally, a lack of financial mechanisms "to enable those land and property owners...to consider alternatives" reduces the credibility of the plan.
Country Land and Business Association	"The SMP must be understood primarily as a means of managing a dynamic physical process and guiding future decision making. It should not be an exercise in the application of current funding formula." The Cost Benefit model undervalues the long-term benefits in relation to the upfront costs. "The CLA believes that the SMP should seek to manage the coastal processes...based on an understanding of the ideal sediment budget for the coast." Further the current level of interference cannot be neutralised by abandoning defences between Cromer and Yarmouth. The strategy should be to conserve beaches by sand nourishing and soft engineering techniques. The CLA opposes the adoption of the SMP, as it must be part of a longer process of rethinking coastal policy. Final point requires\attention to the dredging debate because of the huge concern.
CPRE	Supportive of the approach of working with natural processes, taking a much longer term strategic view, employing the sustainable approach to issues, providing the opportunity for open, transparent debate. Therefore, part of the solution must include compensation. Finally they recognise that a 100% go with the natural process is not a realistic option. They lay out a possible formula for compensation, which is "simple and workable".
East Anglian Society of New Zealand	A petition against the proposals.
Great Yarmouth Liberal Democrats	Suggest offshore reefs to protect the coastline. Also, note the loss of villages and property as unacceptable together with the loss of the fresh water habitat in the Upper Thurne area. Compensation and an investigation into the impact of offshore dredging.

Name	Summary of response
Martham Boat Dyke Trust	In particular, hold the line "Eccles to Beach Road Winterton". Largest breeding colony of Little Terns on the east coast. Plus grey seals in the winter. Natterjack toads in the Marrams which are home to endangered species. Beyond this is the habitat of the otter and great crested newt. And between Waxhan, Winterton, Martham and Hickling provides the habitat for orchids and worts as well as hen harriers, marsh harriers and the bittern. The trustees go on to seek compensation for "all house owners". The trustees also mention the human cost as homes and houses are lost and the tourist trade is lost. The trustees are convinced that dredging affects the shoreline and if it must continue the funds derived from it should be directed to giving compensation to affected homeowners. Finally, the reduction of the Gulf Stream impact on UK should also be considered.
Mundesley Methodist Church	"Benefits of enhancing our tourism potential far outweigh any savings of maintenance costs"
Mundesley Parochial Church Council	After the last war Rev. J Gedge petitioned the King = revetment which has proved very effective.
NNDC Conservative and Independent Group	<p>Change from "Hold the Line" to "Managed Retreat" would be a total lack of social justice. The "ToR" must be widened to include the wider human issues and the study re-run.</p> <p>Other points mentioned: 1) geomorphologic study into gravel extraction offshore should be undertaken. 2) shift impact to social rather than scientific conclusions. 3) Single responsible agency must be given responsibility for coastal defence. 4) DEFRA's current points system renders sea side towns and villages lesser funding than inland flooding. 5) Discussions with Gt Yarmouth and Waveney DC to agree a common approach.</p>

Name	Summary of response
Norfolk Coast Partnership	Well written plan in accessible language, succinct and well supported by information. Support the plan in general, realistic and based on sound thinking. There are serious implications which must be addressed in the light of the development of a naturally functioning coastline. Some reservations: means of managing the implications are not in the plan and while this is not the remit of the plan addressing this would help the acceptance of the plan by those directly affected. Also low level of involvement by representatives from coastal communities. And some reservations about the over-emphasis on economic justification throughout the plan. Particular comments on individual aspects of the plan follow - what look like some useful points here.
Norfolk Green Party	This group see the impact of offshore dredging as "fundamental" to the SMP debate. It is "the fundamental cause of the rapidly escalating erosion". The SMP is "myopic" and exploitative of communities and the environment and the lack of compensation makes the policy "indiscriminate, unethical and socially unacceptable". The \impact on the natural habitat as rivers become salinated and agricultural land is lost. The loss of rich historical and cultural heritage is to be regretted too. Party proposes: a) moratorium on the granting of new marine aggregate extraction licences. b) secure key sand and gravel habitats listed as protected under the EU Habitats Directive 92/43 c) Promote and establish in the UK a marine Economic Zone (200 miles) of Marine Reserves where no "extractive activity" will be permitted.
Norfolk Landscape Archaeology	This group look for the provision of funding to ensure excavation of sites threatened by the proposals of the SMP
Norfolk Wildlife Trust	"We support the view that in order for the plan to work it is important to ensure that there is a continued supply of sediment arising from the soft cliff areas of the plan". In particular, the Eccles to Winterton Road section where they support the hold the line that will move in the longer term to managed re-alignment. The need for research is supported.

Name	Summary of response
North Norfolk Fishermen's Society	Each community could have made a significant contribution to the study. Would like to see other alternatives and scenarios more fully explored. Reflects on the difficulty of launching boats in the different locations along the coast and the impact on Norfolk's fishing industry.
North Sea Action Group	Draft SMP is based on assumptive predictions rather than established findings and factual historical data. The valuable information supplied by fishermen and those that have a practical understanding of coastal processes has been ignored and sidelined. Decisions such as those projected by the document affect the welfare and livelihood of an entire region and need to be based upon realistic data and a totality of well founded factual data without the exclusion of facts that could prove uncomfortable to the government. Studies of a like nature to those that the SMP is based on were carried out in 1992 by the same consultants, Halcrow, who produced erosion line predictions covering the following sixty years. Many of these lines produced were crossed with 12 years, i.e. five times that rate predicted, so producing a lack of confidence in what can only be seen as vague assumptions. This inaccuracy was because the Halcrow Report did not allow for the impact of Offshore Aggregate Dredging. When that factor enters the equation, the apparent anomaly becomes fully explainable. The new SMP must consider this major cause if it is to have any credence. Eleven specific responses covering offshore dredging; sediment budgets; income from dredging; compensation; underfunding; historical/cultural heritage; unfairness/unjust.
Overstrand Bowls Club	From the view point of "absence of local consultation" the Bowls Club objects to the plan and notes that the bowling green is part of an attractive sporting complex on Harbord Road.
Potter Heigham's Residents Association	Lack of evidence that the "hold the line" between Winterton and Eccles is the current policy. Would like to see more public meetings.
Royal Cromer Golf Club	The golf course is an historic one of very high standard. Defences must be maintained to protect property, local community and the golf course in its present form.

Name	Summary of response
RSPB, Eastern England Regional Office	Impact on sites that have been designated for their importance to wildlife (list follows in submission). Overall work towards a sustainable coastline will continue to provide important habitats for wildlife. Eccles to Winterton - RSPB supports the hold the line policy "Continued beach recharge.....should enable the habitat for little terns to remain, despite the ongoing erosion. For the next 50 years, the RSPB feels that wildlife losses that are likely to occur need to be examined much more closely. RSPB recognises the difficulty of establishing re-created habitats and supports conservation in-situ. However if realignment over designated habitats is inevitable compensatory habitats must be provided in advance of the loss.

Name	Summary of response
The Broads Society	<p>Primary concern is to "ensure that the north-east corner of the Broads region...is not flooded as a result of a breach in the dune defences south of Cart Gap." Welcome the length of coast dealt with by the SMP and the strategic approach. Also the SMP will help draw attention to "Coastal squeeze" attributable to climate change which will "make it physically impossible to maintain the coast of East Anglia on its present alignment." However the plan lacks detail about the sociological implications and the authors do not appear "there will be scores of properties whose value will be drastically curtailed." Dismayed at the failure to address this issue with regard to compensation - in particular those to the north of Cart Gap and doubt the reason for this - to provide sediment to strengthen the protection for the Broads - will follow. Surprised that the DEFRA points system is based on purely financial considerations and takes no account of the environmental importance of the sites protected from the sea. This has led to difficulties for the EA to secure funds for the on-going maintenance of defences between Cart Gap and Winterton. From this the Society is disappointed that the strategic approach for planning of which the SMP is part is not reflected in a single organisation to carry out such work. Also the Society comments on the difficulty of predicting the rate of coastal squeeze and sites the Coastal Habitat Management Plan assumptions which (appear) to differ from the SMP. In regard to the section Unit 3b, they note the wording of the SMP because this is the area which is the main line of defence to the Broads. They welcome the intention to maintain the line here but regret the beach feeding funds will not be available until 2007. This leads on to a general "unhappiness" with the way DEFRA distribute funds. They also note that the tombola have caused accretion to such an extent that sediment arriving from the north is being deflected seawards. It is not known if this is "lost" to the system and more research is necessary. The SMP bandings of the set back policy have contributed to the "blight" on property. Finally they caution against the enthusiasm of the conservationists because while the habitats created would be biodiverse there would be loss of recreational value of the broads.</p>

Name	Summary of response
The Church of England Parishes of Bacton, Happisburgh, Hempstead et al	After consultation with a number of Parishes, the Churchwardens and PCC of Happisburgh The Rev'd offers the following: This first revision of the 1996 SMP falls short of this objective to define in general terms the risk to people etc. it is itself already in need of revision. Inadequate to sum up the Parish Church as a heritage feature and of community value is wholly inadequate. The church should be uprated from G3 to G2 and from medium to high in significance. Prefer Managed Realignment to allow time to explore ways to protect this valuable site. Impossible to compensate for the loss of a site associated for over 600 years with the worship of God, so further work needs to be done as a matter of urgency.
The Inland Waterway Amenity Advisory Council	The Viscountess Knollys OBE DL, Chairman IWAAC. Supports the submission of the Broads Authority
The Lutyens Trust	Highlights the loss to the cultural heritage if the plan is accepted by the loss of Lutyens buildings.
The Society for the Protection of Ancient Buildings	"The society fully supports the objective of establishing an environmentally and economically viable long-term strategy for managing this area of the Norfolk/Suffolk coastline". But concerned about the blanket strategy without consideration for the historic environment especially regarding satisfactory evidence for long-term protection of historic buildings. Endorse the comments of English Heritage.
The Victorian Society	A statutory amenity society. Disappointed that they were not furnished with a note of the buildings that will be lost. Brief history of areas growth in popularity. Looking for detailed study on the buildings that would be lost.
Tony Wright, Labour Party Candidate	Tony Wright draws attention to the detail of the adjournment debate held by Norman Lamb in the House of Commons on 08/03/05 and asks all views expressed in that debate be fully weighed in consultation on the SMP. He is also looking for a single agency approach to coastal defence, compensation to those affected and agrees with a hold the line policy. Finally, he is sceptical about the evidence regarding offshore dredging.

Name	Summary of response
VOICE - Villagers Organisation Interested in Coastal Erosion	Managed retreat is unacceptable and hold the line must be clearly defined and published. Managed retreat is only acceptable if the extent of retreat is defined and any loss of property, livelihood or damage to the SSSI is fully compensated. Create a single authority to manage the shoreline. Give more consideration to the people in the area. Stop dredging. Reject plan.

APPENDIX 4**List of Local Government and non-Governmental Agencies responding**

Name	Summary of response
Broads Authority	The Authority supports the general policies for the Eccles to Great Yarmouth stretch of the coast. It advocates holding the line for the next 50 years to provide time to improve current knowledge of coastal processes. Additionally, it has major concerns about: 1) no financial mechanism to address loss of assets; 2) Defending Eccles to Great Yarmouth needs to be evidenced with an allocation of funds; 3) The Authority seeks reassurance that further research to better inform long term options is agreed and commissioned as soon as possible; 4) The issue of dredging undermines support for more sustainable solutions and further work is necessary and to communicate such evidence to stakeholders. Finally, the BA is keen to work closely with the EA and English Nature to raise long-term strategic and funding issues with relevant parts of government.
English Heritage, East of England Region	Lack of historic environmental consultant to the SMP - the possible provider quoted in the SMP says he did not advice. Secondly concerns about the localised problems at Cromer (Pier) and Great Yarmouth. Also, review the values used in cost benefit in areas of managed realignment or no active intervention. Beyond this the loss of the churchyards, scientific information and concerns of families whose members remains are interred. More work also needed to develop Conservation Area Appraisals to evaluate the heritage significance of vulnerable settlements. English Heritage also looking for mitigation of significant archaeological losses and take issue with individual sites rather is looking for a strategic landscape based approach.
English Nature, Norfolk Team	English Nature considers that the SMP "takes proper account of the economic, technical and environmental drivers" and is based on a sound understanding of coastal processes. If implemented EN consider that it would deliver a more naturally functioning sustainable coastline. A significant commentary follows in EN's submission.

Name	Summary of response
Environment Agency	<p>The Plan is consistent with our current sea defence strategy for the frontage from Happisburgh to Winterton. In the short to medium term, we can justify a policy of “hold the line”, subject to available funds. In the long term, 50 to 100 years, the future is less clear. More work needs to be carried out to fully understand the implications to people, their communities, the natural environment and the associated costs of any of the future policies outlined in the plan.</p> <p>The draft Shoreline Management Plan is based on a sound scientific understanding of the coastal processes operating within the sub-cell and the impacts of those processes on this coastline. We maintain that the restoration of dynamic coastal processes is an important component of sustainable shoreline management, delivering the most appropriate and practical defence options in the long term.</p> <p>Using all of the current research and best available data, through the shoreline management plan process, an attempt has been made to understand how the implications of the policies in each policy unit will impact on neighbouring policy units.</p> <p>This draft Shoreline Management Plan has raised important and complicated issues for communities and policy makers on a local and national scale. These issues are in no way unique to this section of coast and will require further debate at a national level. The outcomes of this may well be reflected in the next revision of the document in the next 5 to 10 years. A Shoreline Management Plan is a working document that must react to changes in our knowledge and in Central Government policy.</p> <p>As a partner in the production of this document, the Environment Agency supports the policies within the draft Shoreline Management Plan.</p>

Name	Summary of response
Great Yarmouth BC, Corporate Director (Environment & Economy), Deputy Chief Executive	Accept integrity of technical analysis of the coastal processes with the exception of impact of offshore dredging. Cannot accept the application of this analysis to the SMP i.e. the principle of MR in absence of consideration of human, social, economic and environmental consequences. Total lack of social justice in policy change from hold the line to managed retreat. Action needed: independent analysis of the impact of dredging, professional cost analysis of what is at risk if the plan were implemented, comparison with the cost of appropriate defence strategies, development of a compensation regime. Wants application of draft SMP suspended pending (1) outcome of various studies and (2) suitable measures to address those locations at immediate risk of erosion.
Norfolk County Council. Environment Manager, Department of Planning and Transportation	Following consultation with political group leaders and relevant cabinet members: creating a more sustainable coastline is welcomed, but implications not drawn out in the plan. Important reservations: must be a clear programme and time frames for decision making and resources identified; the plan illustrates the need for a major review of social, economic and environmental costs of managed retreat; Plan would be stronger if included a clear rationale for its position on offshore dredging; Eccles to Winterton policy has clear impact on the Broads and Government reassurance needed that sufficient funds will be available to defend this area; Policy unit implications do not include plans to mitigate against the negative impacts of the preferred plan.
The National Trust	Pleased to see the first revision of the "almost anonymous" 1996 SMP. Proposals for Kelling Hard to Sheringham are consistent with the Trust's Coastal Policy. Eccles to Winterton Beach Road the Trust preferred plan is for hold the line but doubts the financial support for this over the lifetime of the proposed SMP The Trust identify 5 factors that illustrate more information is required before deviating from the hold the line: 1) economic case 2) impact of hold the line on the coasts to north and south 3) ability of the held shoreline to form a natural beach 4) greater understanding of natural habitat cost benefit 5) ability to mitigate displacement and losses.

APPENDIX 5

Proformas

Proforma 2

Name.....

Address.....

.....

Date:.....

Terry Oakes Associates Ltd.
PO Box 186
LOWESTOFT
NR33 0WY

Dear Sirs

I ~~totally~~ reject the proposed *Kelling to Lowestoft Ness Draft Shoreline Management Plan 2004* for the following reasons.

Firstly on the grounds of a lack of social justice in that the plan is unworkable unless compensation for property or land lost to the sea is included. Secondly to allow swathes of this county to disappear means consigning too much cultural heritage to oblivion.

I firmly believe there are other ways of tackling the problem.

Yours faithfully

Signature.....

Further comments:

Proforma 3+ Page 1

Subcell 3b - Draft Shoreline
Management Plan (SMP) Review
2004/05

The ultimate goal of this Study is to *reduce* the risk to people and to the developed and natural environment from flooding and coastal erosion. To achieve this, the management objectives for the shoreline will be developed by taking into account the views of the coastal stakeholders.

Your views and comments will play an important part in the development of the SMP for the Kelling to Lowestoft shoreline.

The partners involved in the production of the SMP have appointed Terry Oakes Associates Ltd. to manage the consultation process. We would be grateful if you would take the time to fill out this comment form and return it to the address below by **31st March 2005**. If necessary, please continue on a separate sheet. An electronic version of this form can be found at www.acag.org.uk and can be submitted by email at the address below.

Terry Oakes Associates Ltd.
PO BOX 186
Lowestoft
NR33 0WY

Email: smp3b@terryoakes.com

Contact Details - Comments received may be incorporated into the SMP although personal details will not be published but may be held on file

1 - Name (and organisation)

2 - Contact details (address, telephone number, email)

Comments on the preferred plan

3 - Are any of the preferred policies presented in the SMP acceptable?

No. These proposals are totally unacceptable. I want to see a new plan that will help the marram dunes hold the present line, supported by offshore reefs, where appropriate.

Proforma 3+ Page 2

4 - Are any of the preferred policies presented in the SMP unacceptable and, if so, why?
What can be done to make policies acceptable?

This is a completely unacceptable plan. I cannot support something that will lead to the loss of so many villages and the loss of so much valuable fresh-water habitat, with the very real threat to the rest of the Norfolk Broads.

5 - Do you have any further comments to add?

**Yes. Only recently we heard about 'global dimming'. This has the opposite effect to global warming! So how can the sea level be predicted for 100 years in the future, as the SMP attempts to do? Even if this country manages to control emissions, what about the developing nations and the USA?
If cost is an issue, allow planning consent for a row of wind-powered electric generators, one on each of the proposed coastal reefs, so long as they pay for the reef construction, in the same way as supermarkets pay for road improvements.
As in Holland offshore banks should not be dredged. To prevent this, each county should have big gravel pits, which can then be used for the much-needed burial of rubbish.**

Thank you for taking the time to participate in the SMP consultation program. Please feel free to attach any supporting information to this form.

Proforma 4

Name.....

Address.....
.....
.....

Date.....

Terry Oakes Associates Ltd.,
PO Box 186,
Lowestoft,
NR33 0WY

Dear Sirs,

I am opposed to the draft **Kelling to Lowestoft Ness Shoreline Management Plan 2004** for the following reasons:

1. The principle of "managed realignment" is unacceptable without considering the human, social and economic consequences for our communities.
2. There is no justice in a fundamental change of policy from "hold the line" to "retreat".
3. Any realignment would have a most damaging effect on one of the most important lowland wetland sites in Britain, including a Ramsar site. Potter Heigham as a whole would be badly affected.
4. A compensation scheme is essential in any proposal, to avoid blight (already beginning) and to maintain confidence in our communities. The cost of defending the coast must be compared against the costs of compensation.
5. The plan is based on unreliable short-term research and, moreover, takes no account of the effects of offshore dredging.

The plan should be rejected.

Yours faithfully,

Signed.....

Proforma 6

Terry Oakes Associates Ltd
PO BOX 186
Lowestoft
NR33 0WY

Date: _____

An objection to the Shoreline Management Plan (Kelling to Lowestoft) from:

Name:	
Company / Organisation:	
Address:	
Postcode:	
Telephone:	
Email:	

Dear Sirs

I totally reject the Shoreline Management Plan. I have a particular interest in policy unit 3b13 - Eccles to Winterton Beach Road. I am a visitor to this area.

I strongly object to the loss of the rural landscape, Norfolk Broads and wildlife.

I find it unacceptable that there is no compensation proposed for loss of homes, property and business.

Signed

Proforma 7

Terry Oakes Associates Ltd
PO BOX 186
Lowestoft
NR33 0WY

March 2005

Dear Sirs

I strongly object to the Kelling to Lowestoft Draft Shoreline Management Plan 2004 as it will destroy our community, my home and my way of life. This plan proposes to abandon us to the sea. Why should we not continue to enjoy the coastal protection put in place after the tragedy of the 1953 floods?

Hundreds of millions of pounds are spent on river flooding defences. Homes flooded by river water can be repaired. If our coastal defences are abandoned, our homes will go for good. This is not justice.

Yours faithfully