

Equality Impact Assessment Screening Opinion

Draft Coastal Adaptation Supplementary
Planning Document

October 2022



Introduction

1. It is a Council's/Broads Authority's duty under the Equality Act 2010 to undertake an Equality Impact Assessment at the time of formulating a decision, drafting a report, designing or amending a policy. This will ensure that the Council is considering and taking positive action where possible to promote access to services for all their communities, including their wider communities. The Equality Impact Assessment Screening Assessment will assess whether there is any impact upon any of the groups with protected characteristics under the Equalities Act, which are listed in the table below. If an adverse impact upon any of these groups is identified, then a full Equalities Impact Assessment will be required.
2. The Coastal Adaptation SPD is being produced jointly by East Suffolk Council (the lead authority), North Norfolk District Council, Great Yarmouth Borough Council and the Broads Authority. Coastal Partnership East – a single team of coastal officers who work across and for North Norfolk, Great Yarmouth and East Suffolk – are also a partner. This Equality Impact Assessment Screening Assessment has been prepared by East Suffolk Council on behalf of all four authorities.
3. North Norfolk District Council Core Strategy policy EN10 (Development and Flood Risk) provides policy guidance about how development should be planned and managed in relation to flood risk. Policy EN11 (Coastal Erosion) provides policy guidance about development in areas at risk from coastal erosion/change. Policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion risk) provides policy guidance about the relocation and replacement of development damaged or destroyed by coastal erosion.
4. Great Yarmouth Borough Council Local Plan Part 2 includes two policies about flood risk and coastal change. Policy EN1 (Flood Risk) provides policy guidance about development and flood risk. Policy EN2 (Relocation from Coastal Change Management Areas) provides guidance about the relocation of development away from areas that are experiencing coastal change.
5. East Suffolk District Council was formed by the merger of Suffolk Coastal District Council and Waveney District Council in 2019. Both of the former Districts have adopted local plans, which contain policy guidance about coastal change and adaptation. Suffolk Coastal Local Plan policy SCLP9.3 (Coastal Change Management Area) sets out the policy position regarding development in areas that area at risk from coastal erosion/change. SCLP9.4

(Coastal Change Rollback or Relocation) provides policy guidance about the relocation of development that has been impacted or destroyed by coastal change, including the provision of replacement housing. Waveney Local Plan policy WLP8.25 (Coastal Change Management Area) provides policy guidance about development within areas impacted by coastal change. Policy WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion) provides policy guidance for development that has been damaged or destroyed by coastal change, which includes providing replacement housing in a safer location.

6. There are no policies in the Broads Local Plan that directly relate to coastal change adaptation, although there is a policy relating to the short stretch of coast in the Broads Authority Executive Area.
7. The Coastal Adaptation Supplementary Planning Document (SPD) provides information and guidance to help communities to cope with the impact of coastal change. Much of the coastal area of this part of East Anglia – especially undefended coastlines – are experiencing rapidly changing coastlines due to erosion. This can lead to the damage or loss of housing and property, as well as land more generally.
8. The Coastal Adaptation SPD seeks to provide additional guidance which will help to deliver the North Norfolk, Great Yarmouth, Suffolk Coastal, Waveney and the Broads Authority Local Plan policies summarised above. The SPD is divided into the following chapters:

Introduction

9. This chapter sets out the purpose of the SPD and explains who has been involved in its preparation. This includes providing definitions of two key terms: partnership authorities and partnership. The former includes East Suffolk Council, North Norfolk District Council, Great Yarmouth Borough Council and the Broads. The latter includes East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads and CPE.

Chapter 1 – Context: Homes, Businesses, Communities and Environments affected by Coastal Change

10. This chapter provides the context in which the Coastal Adaptation SPD is being produced and is divided into three key sections, as set out below:

1. What are the geology and coastal processes affecting the coastline?
2. What are the economic, social and environmental benefits enjoyed along the coastline and how are they affected by coastal processes?
3. How is and will climate change affect the coastline?

Chapter 2 – Coastal Management Measures and Policies

11. This chapter provides an overview of the planning policy and guidance context for the SPD, at both the national and local level. The chapter explains that local authorities along the Norfolk and Suffolk Coast work together to implement Integrated Coastal Zone Management, or ICZM. This is a holistic approach to managing coastal change. At the national level, coastal change is covered by the Coastal Erosion Risk Management Policy Statement and the National Planning Policy Statement (NPPF). The NPPF implements the ICZM approach and requires local authorities to create Coastal Change Management Areas. The Planning Practice Guidance on Flood Risk and Coastal Change is also relevant. The text also explains the boundary between the marine and terrestrial planning systems.
12. At the local level the suite of documents includes Shoreline Management Plans, Local Plans and Neighbourhood Plans and the chapter describes the objectives for each document in terms of managing coastal change. It also lists the Local Plans which are covered by the Coastal Adaptation Supplementary Planning Document. It outlines key policies from each of the Local Plans covered by the SPD which relate to Coastal Change Management Areas and Coastal Rollback.

Chapter 3 – Development in the Coastal Change Management Area

13. This chapter provides an explanation of what a Coastal Change Management Area is and summarises the guidance contained in the Planning Practice Guidance. The chapter then provides an explanation of policy about the different types of development that can occur within coastal change management areas, including permitted development. The final section of the chapter provides an overview of the Coastal Erosion Vulnerability Assessment (CEVA), which is used to assess whether a proposed development will be appropriate and seeks to balance the need to maintain the viability of coastal communities against the threat from coastal erosion/change.

Chapter 4 – Rollback and Relocation

14. This chapter sets out the National Planning Practice Guidance relating to rollback and relocation, as well as the Local Plan policies. The chapter provides guidance about when the rollback/relocation of homes and businesses affected by coastal erosion/change would be acceptable and appropriate.

Chapter 5 – ‘Enabling’ Development

15. This chapter explains the concept of enabling development, which is a development that is contrary to policy but is permitted because its public benefits outweigh policy considerations. This is then applied to development that enables the relocation of homes and businesses impacted by coastal change. The chapter provides information about a range of different types of development that are impacted by coastal change and set out, when enabling development may be required and what viability information will be necessary to demonstrate an enabling development case.

Appendices

16. There are also six appendices:
 - i) Norfolk and Suffolk Coastal Authorities Statement of Common Ground
 - ii) Organisation roles and responsibilities
 - iii) Coastal Erosion Vulnerability Assessments Level A & B
 - iv) Case studies
 - v) Neighbourhood Plan Guidance
 - vi) Glossary

Equality Act 2010

- vii) The Equality Act 2010 lists nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation. A tenth characteristic, socio-economic deprivation, is considered in addition to the nine protected characteristics listed in the legislation. This reflects that pockets of deprivation that exist across the SPD area.

Screening of impact on different groups

| | Groups | Likely Impact (positive/negative/no impact) | Reason for your decision |
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| a | Age (Includes safeguarding issues) | No impact | <p>The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group.</p> <p>Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language).</p> <p>The draft SPD consultation will therefore not discriminate against those from different age groups.</p> |
| b | Disability | No impact | <p>The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group.</p> |

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| | | | <p>Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language).</p> <p>The draft SPD consultation will therefore not discriminate against those with any disability/ies.</p> |
| C | Gender reassignment | No impact | <p>The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group.</p> <p>Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language).</p> <p>The draft SPD consultation will therefore not discriminate against those who have undergone gender reassignment.</p> |

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| D | Marriage and Civil Partnership | No impact | <p>The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group.</p> <p>Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language).</p> <p>The draft SPD consultation will therefore not discriminate against those who are married or in a civil partnership.</p> |
| E | Pregnancy and maternity | No impact | <p>The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group.</p> <p>Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service</p> |

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| | | | <p>centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language).</p> <p>The draft consultation SPD will therefore not discriminate against those who are pregnant or mothers.</p> |
| F | Race | No impact | <p>The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group.</p> <p>Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language).</p> <p>The draft SPD consultation will therefore not discriminate against those from different racial backgrounds.</p> |
| G | Religion or Belief | No impact | <p>The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that</p> |

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| | | | <p>are at risk from coastal change. It will therefore not discriminate against this group.</p> <p>Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language).</p> <p>The consultation will therefore not discriminate against those different religions or beliefs.</p> |
| H | Sex | No impact | <p>The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group.</p> <p>Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language).</p> |

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| | | | The draft SPD consultation will therefore not discriminate in terms of sexual identity. |
| I | Sexual orientation | No impact | <p>The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group.</p> <p>Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online, in libraries and in the LPAs' customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language).</p> <p>The consultation will therefore not discriminate in terms of sexual orientation.</p> |
| J | Socio-economic deprivation | No impact | <p>The Coastal Adaptation SPD provides guidance that implements the planning policies of North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority and East Suffolk Council. In particular, this SPD provides guidance about new and existing development in areas that are at risk from coastal change. It will therefore not discriminate against this group.</p> <p>Consultation documents will (as appropriate, depending on the precise requirements of the LPAs' individual Statements of Community Involvement) be available online,</p> |

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| | | | <p>in libraries and in the LPAs’ customer service centres (or equivalent) and the LPAs will offer assistance in publicity material (for example, for those who would like the document in a foreign language).</p> <p>The consultation will therefore not discriminate against those who are experiencing economic or social deprivation.</p> |
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Consultation and Engagement

There was an initial process of consultation that guided the preparation of the Coastal Adaptation SPD, which ran from 4th September 2020 to 16th October 2020. This initial stage of consultation was led by East Suffolk Council but all four organisations were involved in promoting the consultation. The purpose of the initial consultation was to inform the content of the Coastal Adaptation SPD. The consultation took the form of a short document that set out the main aims of the Coastal Adaptation SPD, the local planning policy background relating to development and coastal change and a proposed list of contents. The latter part of the consultation document took the form of a series of questions, the answers to which will inform the content of the future Coastal Adaptation SPD. The consultation document was published on East Suffolk Council’s consultation portal and advertised on the Council’s website and on social media. Consultees on each of the four authorities’ mailing lists were also contacted.

In view of the Covid-19 social distancing measures that prevailed during the initial consultation, the Council had set out measures to enable safe participation in the consultation and to ensure that those who wish to engage in the consultation are not disadvantaged. The Council would normally have made hard copies of consultation documents available to view in libraries and in the Council’s offices for those who are unable to view them online, however as this was not possible to do this at this time due to the Covid-19 pandemic the Council put alternative measures in place. For those unable to view the consultation documents online, hard copies were made available on request (free of charge) by post. In view of these measures the Council did not consider that this initial consultation disadvantaged any of the groups covered by this EQIA screening exercise.

A formal public consultation on the Draft Coastal Adaptation SPD will take place from January 2023 for six weeks. Consultation letters and emails will be sent to consultees on the LPAs' Planning Policy mailing lists. The planning policy mailing lists includes Town and Parish Councils, Suffolk and Norfolk County Councils, neighbouring district councils, developers, agents, landowners, business associations, civic societies, infrastructure providers, and members of the public. A press release will be prepared, and it will be publicised through the councils' social media channels too.

Copies of consultation documents will be available online, and hard copies made available for inspection in libraries and in the LPAs' customer service centres (as appropriate).

Anyone who is unable to view the consultation documents online, in libraries or in the Customer Service Centres can contact the relevant council/authority, and the publicity material provides contact details and an offer of assistance.

Presentation in Different Languages

As part of a six-week period of formal consultation, the document will be published on the LPAs' websites, with hard copies available on request for those unable to access it online. The document may also be requested in a different language. When such requests are received, the Customer Services Team will be involved with ensuring this request is actioned.

Proposed Changes

The LPAs will analyse responses received during the public consultation and will make any appropriate changes as a result of comments received.

Conclusion

This EQIA screening exercise shows that the Coastal Adaptation SPD will not negatively impact upon any protected group or those experiencing socio-economic deprivation. Therefore, a full EQIA assessment is not considered necessary.