Contents

1. Introduction .................................................................................................................. 2
2. Summary of informal consultation prior to the publication of the First Draft ..... 3
3. Informal Consultation on First Draft ........................................................................... 4
   Who was consulted and how? .................................................................................. 4
   What issues were raised and how were they addressed ................................... 5
Appendix A – List of People and Organisations Consulted. ............................................. 43
Appendix B – List of People and Organisations who responded to the consultation on
the First Draft .................................................................................................................. 47
1. **Introduction**

1.1 A Draft Supplementary Planning Document (SPD) has been prepared to provide more detailed guidance for the delivery of the Sustainable Urban Neighbourhood and Kirkley Waterfront site as allocated by Policy SSP3 of the Lake Lothing and Outer Harbour Area Action Plan. The SPD sets out a site-specific vision and objectives for the delivery of the Sustainable Urban Neighbourhood and Kirkley Waterfront site and builds upon the detail set out in the Area Action Plan. Importantly it seeks to ensure that a comprehensive approach to development is achieved. In summary, the brief sets out:

- the distribution of land uses across the site,
- high level street network and transport proposals,
- open space and landscape principles
- design principles
- flood risk mitigation requirements
- implementation strategy

1.2 In accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012, this statement sets out the persons the local planning authority has consulted when preparing the SPD. It sets out a summary of the main issues raised and how they have been addressed in the Draft SPD.

1.3 Work on the SPD began in late 2010 in response to interest by landowners to submit planning applications for the Sustainable Urban Neighbourhood and Kirkley Waterfront. Initial work involved the preparation of a ‘Preliminary Development Brief’. This was subject to only focussed consultation, with landowners, the Environment Agency and Suffolk County Council.

1.4 Work on the ‘Preliminary Development Brief’ helped provide a basis to develop the document into a full first draft Development Brief in late 2011. During the preparation of a first draft of the Development Brief a number of meetings were held with Suffolk County Council, landowners and the Environment Agency to discuss the content.

1.5 A first draft Development Brief was published for informal public consultation in early 2012. The consultation invited comments from the neighbours, the wider public, landowners and other interested organisations. Consultation was also undertaken with students at the Lowestoft Sixth Form College. The results of this consultation have helped shape the Draft SPD.
2. Summary of informal consultation prior to the publication of the First Draft

2.1 Prior to the publication of a first draft of the Development Brief in February 2012 a considerable amount of engagement took place with landowners, and organisations including the Environment Agency and Suffolk County Council dating back to late 2010. Some of this engagement was also part of the process of preparing the Lake Lothing and Outer Harbour Area Action Plan.

2.2 In response to interest by landowners to submit planning applications for the Sustainable Urban Neighbourhood and Kirkley Waterfront in late 2010 a ‘Preliminary Development Brief’ was prepared. At the time the Lake Lothing and Outer Harbour Area Action Plan had not yet been submitted for examination and it was felt there was insufficient detail in the Area Action Plan to help determine an application and secure a comprehensive development. As such the ‘Preliminary Development Brief’ was prepared to expand on the emerging policies in the Area Action Plan and to set out the scope for a full Development Brief.

2.3 The ‘Preliminary Development Brief’ was sent to landowners within the Sustainable Urban Neighbourhood, the Environment Agency and Suffolk County Council for comment. Advice received from the Environment Agency and Suffolk County Council helped shape the content and detail of the first draft of the full Development Brief.

2.4 Advice on the content, scope and presentation of the Development Brief was also given by ATLAS (Advisory Team for Large Applications).

2.5 Following the close of the hearings as part of examination of the Lake Lothing and Outer Harbour Area Action Plan, the Council started a series of meetings with landowners, Suffolk County Council and the Environment Agency. These meetings helped develop the content of parts of the first draft of the Development Brief. These meetings also helped shape the outline masterplan presented in the first draft of the Development Brief.

2.6 The first draft development brief has been prepared and approved in conjunction with the Council’s Local Development Framework Working Group. This working group consists of 13 elected members and officers from Planning, Housing and Regeneration.
3. **Informal Consultation on First Draft**

**Who was consulted and how?**

3.1 A first draft of the Development Brief was published for consultation on the 10\(^{th}\) February 2012. The consultation period lasted until 23\(^{rd}\) March 2012. The aim of the consultation was to raise awareness of the project and get people's views on the proposals for the site. The consultation also sought to get detailed views from developers, government agencies and local organisations on the content of the first draft of the Development Brief.

3.2 As part of the consultation, members of the public, statutory consultees, local organisations, local developers, and Parish and Town Councils were all invited to make comments. A full list of the people and organisations consulted is found in Appendix A.

3.3 The consultation involved inviting people's written comments on the first draft of the Development Brief.

3.4 To help encourage a response from the general public a summary leaflet of the Development Brief was produced which presented the outline masterplan for the site and summarised some of the key development requirements set out in the first draft of the Development Brief. The leaflet was sent to all the households neighbouring the site and all businesses within the site and neighbouring the site. The leaflet was also sent to people registered on the Waveney Local Development Framework mailing list. Additionally, the Council published a press release to raise awareness and encourage responses from the public and an article was placed in the April edition of Council's ‘Intouch’ Magazine which is distributed to all households in the District.

3.5 A public exhibition was held on the 1\(^{st}\) March 2012 at Whitton Community Hall where the public and local businesses could come and talk to planning officers and get a better understanding of the plans for the area as set out in the first draft of the Development Brief. Exhibition boards detailing the proposals were also placed in the Marina Customer Service Centre, Lowestoft 6\(^{th}\) Form College and the East Point Academy.

3.6 Planning officers also attended an AS level geography lesson at the Lowestoft 6\(^{th}\) Form College to explain the proposals to the students. During the lesson, students undertook a practical exercise of distributing land uses across the site whilst taking into account different constraints. Students were supportive of the proposals and supportive of a pedestrian bridge across Lake Lothing. 11 Students from the college also submitted written comments.

3.7 In total 167 people/organisations responded to the consultation. The issues raised and how they were addressed are explained in the next section in detail.
What issues were raised and how were they addressed

General Issues

3.8 Overall, the majority of representations indicated general support for the proposals as detailed in the First Draft. Some of these were with reservations, particularly about impact on the local road network and need for a third crossing. There were only a handful of outright objections to the proposals.

3.9 Some concern was raised about the naming of sub-areas within the site and the distinction between the Sustainable Urban Neighbourhood and the Kirkley Waterfront.

3.10 Some respondents suggested that the document should consider and develop proposals for other parts of Lake Lothing.

Response: The widespread support for the proposals is welcomed. Issues with impacts of traffic are dealt with later in this report.

Further thought will be given to the names of different parts of the site and how they are referred to throughout the report. Figure 2.2 will be amended as appropriate.

The Lake Lothing and Outer Harbour Area Action Plan sets out proposals for the wider Lake Lothing area. Detailed Development Briefs for other areas of Lake Lothing will be prepared in due course.

Conclusion: Revise Figure 2.2 and the way in which the site is referred to.

Vision and Objectives

3.11 Three responses were received that supported the objectives set out to deliver a development that implements sustainability measures such as energy and water efficiency.

3.12 It was suggested that section 3.1 ‘Vision and Objectives’ was relocated to section 1.2 ‘Policy context’ and did not repeat the objectives set out in the AAP.

3.13 Suffolk County Council suggested that Objective 7, which relates to high quality design, could address the interior of buildings as these living environments are an important part of a sustainable neighbourhood. For example, Lifetimes Homes is a relatively affordable standard which is designed to make new homes more functional and flexible and consequently more responsive to the needs of an ageing society.

3.14 Suffolk County Council commented that Objective 12 ‘Sustainable Building’ only relates to energy and water and only when the building is occupied. To better represent sustainability, it may be desirable to reflect the broader remit of the Code for Sustainable Homes and BREEAM and recognise the opportunities for renewable/low carbon energy generation. Furthermore, WDC
may like to consider sustainability in the construction phase, for example regarding reuse of aggregates on site.

<table>
<thead>
<tr>
<th>Response:</th>
<th>Agree that the wider concepts of sustainability should be addressed within the objectives to better reflect the aspirations of a ‘Sustainable Urban Neighbourhood’.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>There is a connection between the vision and objectives with the policy, however, to clearly differentiate between the vision and policy no change will be made.</td>
</tr>
<tr>
<td></td>
<td>The SUN and Kirkley Waterfront is a key component of the Lake Lothing and Outer Harbour Area Action Plan and the overall objectives are reflected in this Development Brief. Policy SSP3 will be reiterated in the brief.</td>
</tr>
<tr>
<td>Conclusions:</td>
<td>Living and working spaces are an important part of a new development and people using the area. Objective 7 will be amended to reflect the importance of adaptability of a building to meet the needs of a changing population and support a high quality of life. The brief discusses the energy and water policies which are higher than those required by the Council’s adopted Development Management Policies, however, the requirement to achieve the wider sustainability standards of CfSH and BREEAM will be made more explicit in Objective 12.</td>
</tr>
<tr>
<td></td>
<td>Policy SSP3 ‘Kirkley Waterfront and Sustainable Urban Neighbourhood’ will be included in an appendix of the brief.</td>
</tr>
</tbody>
</table>

**Land Use and Outline Masterplan**

**General Comments (1)**

<table>
<thead>
<tr>
<th>3.15</th>
<th>It was suggested that the Development Brief could be improved if an indicative land use budget was included.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Response:</strong></td>
<td>It is agreed that a land use budget would be a useful addition to the Development Brief.</td>
</tr>
<tr>
<td><strong>Conclusion:</strong></td>
<td>Add land use budget to beginning of Section 3.2</td>
</tr>
</tbody>
</table>

**Too much housing proposed (3)**

<table>
<thead>
<tr>
<th>3.16</th>
<th>A small number of people raised concerns that too much housing was being proposed. The responses question the need for more housing in the town. They question whether there will be enough employment in the town and whether there will be services to support an increased population. Similar to other responses, concern was raised about the impact of the development on the town’s road network.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Response:</strong></td>
<td>The level of housing for the District and the town over the plan period (to 2025) was established by the Waveney Core Strategy (2009).</td>
</tr>
</tbody>
</table>
The Core Strategy identified a need for an additional 290 new homes each year in the District. This figure was lower than previous housing delivery rates in the District and reflected the need to rebalance the mix between housing and employment provision and the need to secure regeneration on underused brownfield sites in the centre of Lowestoft. The Lake Lothing and Outer Harbour Area Action Plan and this emerging Development Brief provides further guidance on how this level of housing can be delivered on the ground. The development proposals also seek to bring 12 hectares of land back into employment use.

The Sustainable Urban Neighbourhood and Kirkley Waterfront site is located in a central location with good access to employment and essential services and should therefore reduce the need to drive. This coupled with sustainable transport provision such as a bus route, cycle paths and a new pedestrian/cycle bridge should limit the impact of the site on the local road network.

**Conclusion:** No changes necessary.

### Housing Density (3)

3.17 Concern was raised that the housing densities suggested in Figure 3.2 and the table following paragraph 3.2.11 were not flexible enough. It was suggested that housing densities identified in the document should only be indicative and final housing densities should be dependant on detailed viability and master planning testing at the time of a planning application. Particular concern was raised about the density guidance detailed in paragraph 3.2.9 about the area of the site fronting Waveney Drive.

3.18 One respondent questioned what type of housing will be planned.

3.19 One respondent stated that it was not clear in the document what the massing and maximum height of buildings would be from the densities proposed.

**Response:** It is considered that the guidance on density already provides a degree of flexibility with the ranges provided in the table following paragraph 3.2.11. These figures are only approximate and will provide flexibility for exact densities at the time of a planning application. Nevertheless, it is important that densities on the site broadly relate to their surroundings, opportunities and site constraints. The statements in paragraph 3.2.9 only require a similar density to the existing properties on Waveney Drive and there will be some flexibility for slightly higher densities if appropriate and necessary.

The types of housing planned are identified in paragraphs 3.27, 3.28, 3.29 and 3.2.10. All type of housing will be acceptable on the site, but the majority will be terraced / townhouse styles given the central location of the site and the character of the surrounding areas. This gives an idea on the massing of buildings. More detail on massing will be left to Design Codes for individual character areas.

The brief is not specific on heights of buildings except in certain locations as detailed in Section 3.5. Generally buildings will be 2 or 3 storey, with
some 4 storey to 6 storey apartment blocks on the waterfront and other parts of the site. More detail on building heights will be left to Design Codes for individual character areas.

**Conclusion:** No changes necessary.

**Housing Mix (3)**

3.20 Two respondents welcomed a mix of market housing and affordable housing on the site given the current mix of private and affordable housing in the Kirkley ward. Although concern was raised that too many affordable units may be being sought.

3.21 Another respondent questioned whether there would be provision of housing for people with disability and whether there would be any provision for day centres for disabled people and respite centres within the development.

**Response:** The Development Brief reflects the requirements of adopted policies DM18 of the Development Management Policies and HC1 of the Lake Lothing and Outer Harbour Area Action Plan which seek to maximise affordable housing to deal with the current shortages of supply whilst retaining an appropriate mix of market housing and affordable housing on any one site.

It is appreciated that the first Draft Development Brief fails to make appropriate mention of the need for homes with people with disabilities. Building Regulations Part M sets some requirements for access to buildings. Lifetime Homes, which includes provision for disabled people, is encouraged by Waveney’s planning policies (Policy DM04) but this is not a mandatory requirement. The County Council has responsibility for the provision of day centres.

**Conclusion:** Make reference to the need for housing for people with disabilities and Lifetime Homes in the Housing Mix section of the Development Brief.

**The mix of Housing and Employment on the Site (8)**

3.22 A number of people raised concerns about the compatibility of the employment land and housing land. Concerns were raised about noise and amenity and the need for distinction and demarcation between the areas including in terms of access. It was suggested that housing may be better next to the County Wildlife Site on the eastern boundary rather than employment.

3.23 It was suggested by one respondent that the need for ‘buffer uses’ between more heavy industrial and residential in the eastern part of the Sustainable Urban Neighbourhood and Kirkley Waterfront should be applied flexibly and their need should be considered in both the long and short term.

3.24 Suffolk County Council suggested that it would be helpful to identify the relevant supporting LDF planning policies which support the temporary use of land on the Jeld Wen Factory site for employment use.
There are numerous examples where housing and employment uses can sit comfortably together and a mix of uses helps create more vibrant communities and reduces the need to travel. It is appreciated that there could be issues with respect to noise and amenity and these will need to be dealt with in the preparation of detailed planning applications. There are sufficient safeguards in paragraph 3.2.23 to ensure these issues are considered.

It is considered that there is sufficient flexibility within the Development Brief about the use of ‘buffer uses’ between housing and employment in both the short and medium term.

There are no policies in the Lake Lothing and Outer Harbour Area Action Plan or other LDF documents that specifically promote the use of temporary employment uses on the Jeld Wen Factory site. The proposal is a new idea that will help deliver the policy objectives of the Area Action Plan.

**Conclusion:** No changes necessary.

**The waterfront should be used for employment (8)**

3.25 A number of respondents suggested that more of the waterfront should be used for employment purposes rather than housing. Respondents stated that the waterfront could be used for large scale manufacturing and servicing associated with the offshore engineering sector and should therefore be protected for employment uses. It was also suggested that the loss of the waterfront to housing would permanently limit the future potential for Lowestoft to exploit the North Sea. It was suggested that the Brooke Business Park may be better suited for employment uses.

3.26 Concern was also raised about the existing businesses operating on the Brooke Business Park.

3.27 Concern was raised that housing on the waterfront would be incompatible with operations on the north side of Lake Lothing and could lead to noise complaints which could threaten existing operations on the north side of Lake Lothing. One respondent stated that their business on the north side of Lake Lothing in the Harbour Road area frequently undertake noisy operations on the waterfront including high pressure water blasting.

**Response:** The Sustainable Urban Neighbourhood and Kirkley Waterfront site will bring back a total of over 400m of waterfront into employment use. Other proposals within the Lake Lothing and Outer Harbour Area Action Plan include using more of the waterfront for employment uses. The only area of waterfront in current employment use which the draft plans propose to change to housing and leisure is the Brooke Business Park.

A key objective of the Lake Lothing and Outer Harbour Area Action Plan and the Development Brief is to open up access to the waterfront to the general public. A large number of people who responded to this consultation supported greater access to the waterfront. Unrestricted public
access to the waterfront is more easily achieved with housing and leisure uses fronting the water rather than heavy industrial uses.

The issue of noise was given significant consideration through the examination of the Lake Lothing and Outer Harbour Area Action Plan and it was concluded that it was not a fundamental constraint on development in this location. Evidence was presented by the Council's Environmental Health department which suggested that despite there being existing properties in the Harbour Road industrial area there had been limited complaints to date. There is also some existing housing on the south-side of Lake Lothing that are opposite to some of the operations on the north-side of Lake Lothing on Harbour Road. Changes to Policy EHC1 of the Area Action Plan will ensure that noise is considered at the planning application stage and appropriate mitigation measures, such as design features are put in place. Paragraph 2.17 of Appendix 1 of the Development Brief reiterates this.

Where businesses need to relocate the Council will assist them through the Relocation Strategy as described in paragraph 3.2.26.

**Conclusion:** No changes necessary.

---

**Retail (2)**

3.28 One respondent questioned whether the town needed more retail units given recent closures in the town centre.

3.29 One respondent pointed out that there was a consistency error in paragraph 3.2.29 with respect to the terminology used to refer to the local centre. It was suggested that all references to ‘neighbourhood centre’ were replaced with ‘local centre’.

**Response:** Retail provision on the Sustainable Urban Neighbourhood and Kirkley Waterfront will only be small-scale to serve day-to-day needs of people who will live in the area and will not compete with the town centre.

It is agreed that references to ‘neighbourhood centre’ should be replaced with ‘local centre’ to ensure consistency of terminology throughout the document.

**Conclusion:** Change references to ‘neighbourhood centre’ to ‘local centre’.

---

**Location of the Marina (2)**

3.30 Concerns were raised that any new marina immediately to the west of the Brooke Business Park peninsula could impact upon navigation and the ability to dredge the channel. Concern was also raised about ownership over the water area in relation to any marina.

**Response:** The Development Brief is not proposing a marina in this location. Paragraph 3.2.32 of the first Draft Development Brief states that new marina facilities could be provided around the Brooke Peninsula. However, it is not specific on where. Paragraph 3.2.32 also states that it will be necessary to ensure that existing navigation of Lake Lothing is not
Conclusion: Strengthen wording in paragraph 3.2.32 to ensure that any new marina development does not inhibit navigation or the ability to dredge the channel.

Leisure and Marina facilities (12)

3.31 A number of people responded to state that they would like to see more land allocated for leisure. A number of respondents also stated they would like to see the marina extended to provide new moorings including free moorings. It was suggested that a benchmark could be the Norwich Riverside development.

3.32 A number of respondents would like to see bars and restaurants in the area.

3.33 A suggestion was made that a maritime museum could be located on the site.

3.34 A number of respondents stated they would like to see leisure facilities such as a multiplex cinema, indoor water park and 10 pin bowling facilities located on the site.

3.35 One respondent questioned the scale of the leisure development with respect to the paragraph 3.2.33 which states that there should be no more than five ground floor units of leisure uses which should be under residential properties. The respondent suggested that the ground floor space of five residential units would only accommodate two modest sized leisure units.

Response: The leisure facilities identified in the Sustainable Urban Neighbourhood and Kirkley Waterfront First Draft Development Brief are proposed to be small-scale accommodating a few bars and restaurants to compliment the existing offer in the area. In accordance with the ‘town-centre first’ sequential approach, the Lake Lothing and Outer Harbour Area Action Plan allocates the Peto Square area near the Bascule Bridge for new leisure facilities.

The five ground floor units of leisure uses do not have to be the same size as the residential units above them, which are likely to be apartments. Paragraph 3.2.33 states there should be no more than five ground floor units below residential properties, not five units below five residential properties. As such there could be five ground floor leisure uses of a modest size and a greater number of apartments above.

Conclusion: No changes necessary.

Concern over new drinking establishments (1)

3.36 One respondent raised concerns over the amount of drinking establishments to be provided on the site and their associated opening times. The respondent stated that opening hours should be restricted given the proposed new private housing and primary school.
Response: The Sustainable Urban Neighbourhood and Kirkley Waterfront Draft Development Brief proposes only small-scale leisure development with a limited number of restaurants and bars. Opening hours of a drinking establishment are a licensing matter. Before any new premises are allowed to open they will require a license.

Conclusion: No changes necessary.

Location of the Primary School (2)

3.37 Two respondents questioned the location of the primary school. One questioned whether it was sensible for the primary school to be located next to the waterfront. The other questioned whether it was suitable for the primary school to be located next to the main access road due to issues of road safety.

Response: The primary school has been located in a central part of the site near other essential services to create a focal point to the development. The buildings themselves will not be adjacent to the waterfront and the parts of the land that are adjacent to the waterfront will be fenced to keep the children safe.

Suffolk County Council, as the local Highway Authority, have advised that they would prefer if the primary school was on the main access road to provide easy access. Road safety measures would be incorporated into the design of the road.

Conclusion: No changes necessary.

Need for a church (2)

3.38 Two respondents suggested the need for a church on the site. One of respondents specifically stated that the Lowestoft Community Church were actively looking for a site for a church in central Lowestoft and the Sustainable Urban Neighbourhood and Kirkley Waterfront site would be a potential site.

Response: Religious buildings, such as churches can act as focal points for a community and can provide additional community space outside of religious services. Dependant on the size and nature of the proposal, a centrally located church or other religious building could be supported. Such a proposal would need to be small scale, designed to serve the local community with limited associated surface car parking. The Council could not require a developer to freely transfer a parcel of land for a church as there is no evidence that the new development itself would create a need for a specific church.

Conclusion: No change necessary.

Community Uses (1)

3.39 One respondent stated that paragraph 3.2.36 should be expanded to explain how and with whom the community use of primary school buildings will be 'explored'.
Streets and Transport

Support for the pedestrian / cycle bridge over Lake Lothing (8)

3.40 A number of people consulted supported the idea of the pedestrian / cycle bridge over Lake Lothing at the Brooke Peninsula. This included support from cycling and sustainable transport organisations who see this as a valuable link.

Response: Support welcomed.
Conclusion: No changes necessary.

Concern about the pedestrian / cycle bridge over Lake Lothing (34)

3.41 A number of people who use the waters of Lake Lothing for yachting or business objected or raised concerns about the pedestrian / cycle bridge. This was due to the potential impact on navigation which in turn could restrict current activities and threaten existing businesses and the economic potential of the area west of the proposed bridge location. Some groups/individuals raised an absolute objection others just raised concerns. Specific concerns included:

- If the bridge is to be a fixed bridge, an air draft of 38 metres would be needed over high water. An opening bridge would need to be manned 24 hours a day;
- If the bridge was an opening bridge, the proposed location could cause difficulty for manoeuvring vessels due to the narrowness of the channel, particularly at low water when waiting for the bridge to open;
- Any failure of the bridge would leave in-bound vessels trapped between the Bascule Bridge and the footbridge in an area where vessels are prohibited from mooring or landing crew;
- An unmanned lifting or swing bridge could be vulnerable to vandalism;
- Concern over an opening bridge which could lead to delays, disruption and maintenance headaches;
- Concern that the pedestrian / cycle bridge may inhibit heritage vessels visiting the area due to width and depth of the channel in this location;
- Free access to the Broads.

3.42 A number of people suggested that instead of a bridge a water taxi/ferry service could prove a more acceptable and more affordable alternative. It was also suggested that any cycle and pedestrian bridge is attached to the existing railway swing bridge.

3.43 The Broads Authority stated that, as the navigation authority for the Broads, it was greatly concerned that the proposed pedestrian / cycle bridge may
impede vessels wishing to access the Broads. The Broads Authority stated is would wish to be involved in any discussions regarding the parameters and assessment of bridge options.

3.44 A number of people commented that they believed the proposed pedestrian/cycle bridge was a ‘waste of money’ and the benefits did not outweigh the costs. They believed the money would be better spent on a third vehicular crossing.

3.45 On a similar note, a number of respondents raised concerns about the impact of the proposed pedestrian / cycle bridge on the viability of development if developers on the Sustainable Urban Neighbourhood and Kirkley Waterfront site are required to contribute towards the majority or all of the cost of the bridge.

3.46 A number of people raised the issue that the increased permeability provided by the bridge may increase criminal activity by providing criminals with a quick escape route across Lake Lothing from the police.

3.47 One respondent raised concerns that the bridge may lead to increased parking problems on the north-side of Lake Lothing from people wanting to visit the site.

3.48 One respondent suggested that the bridge over the railway line on the north-side of Lake Lothing, which any bridge over Lake Lothing would need to connect to, needs improving. Concern was raised that it was very difficult to get bicycles over the existing steep bridge. The respondent suggested that improvements were needed regardless of the Sustainable Urban Neighbourhood and Kirkley Waterfront project.

Response: In response to concerns raised about the impact on navigation the Council met with members of the yachting community and businesses in the western end of Lake Lothing that make use of Lake Lothing. At the meeting it was suggested by both the yachting community and the local businesses that a chain-ferry could be a viable alternative to a bridge which would have less impact on navigation. The Council do not consider this to be a preferable option and will not deliver the same level of use as a bridge and therefore will not have the same sustainable transport benefits. The meeting raised a number of issues with the operation of a bridge and it is clear that in bringing forward the bridge further discussion and consultation will be required with the people who use Lake Lothing to ensure navigation is not compromised. Any pedestrian bridge will need to be designed so that it can open 24 hours a day, 7 days a week. Appropriate signalling will also be required. These measures should help overcome the concerns raised about the impact on navigation.

The Council believes that there will be many positive benefits from the pedestrian / cycle bridge in this location. The pedestrian bridge will link the development to Normanston Park and improve access to Oulton Broad North Station and other services located in Oulton Broad. The quick link to Oulton Broad and North Lowestoft will help reduce the impact of the development on traffic in the town. The bridge will also provide wider benefits for the town by providing a much needed crossing in the centre of Lake Lothing for pedestrians and cyclists. It will provide a more direct route
to further education establishments in the north of the town to people from South Lowestoft. Taken as a whole, it should enhance the attractiveness of walking and cycling by reducing journey lengths between North and South Lowestoft. The cost of a pedestrian and cycle bridge crossing is likely to be a 10th of the cost of providing a vehicular crossing. It is likely that a pedestrian and cycle bridge could be funded and achieved in the relative short-term.

Although the Council will continue to campaign for and support a vehicular crossing it is less certain whether there will be funding or a deliverable solution for a third vehicular crossing. There is a risk that by diverting developer contributions and other funding away from a pedestrian and cycle bridge to a vehicular bridge that no additional crossings are delivered over the centre of Lake Lothing. Notwithstanding this, the Development Brief will ensure that opportunities for a third road crossing are not lost as development of the site takes place.

The Council will be exploring other funding sources and developers on the Sustainable Urban Neighbourhood and Kirkley Waterfront site will not have to contribute to the full cost of the bridge. Developers contributions will be subject to viability testing. Where an acceptable level of contribution cannot be secured due to viability issues, the Council will seek to use deferred contributions arrangements or overage agreements to secure higher contributions if and when the market improves.

Crime issues should be mitigated by increased overlooking from new development. CCTV associated with the operation of an opening bridge may also deter criminal activity.

It is unlikely that the site will be a destination in its own right that would lead to significant increased parking problems north of Lake Lothing. The new schools catchment area would be limited to the south-side of Lake Lothing and there would be limited other destinations immediately south of the bridge that would encourage people to drive to the north of Lake Lothing to gain access to.

Improvements / replacement to the pedestrian and cycle bridge over the railway line have been identified in the Council’s Infrastructure Study that is informing the introduction of a local Community Infrastructure Levy.

**Conclusion:** Add extra text about operation requirements of the pedestrian bridge in order to minimise impacts on navigation in Lake Lothing.

**Bus Services (8)**

*3.49* A number of comments mentioned the need for an adequate bus service for the site. Concern was raised by some respondents that not enough thought had been given to the provision of bus services and that the current text is vague. Comments suggested that the services should be designed so that the maximum number of households are within easy walking distance of a bus stop. It was also suggested that any proposed service(s) should form a circular route which embraces Bridge Road, which is inadequately served at present by public transport.
3.50 One comment suggested that services should be provided from the start of the development and that bus shelters should be provided with proper seating.

3.51 Concern was raised that the Council would not be able to influence the bus companies to set up a route through the site.

3.52 Suffolk County Council suggested that an enhanced service in this location may necessitate some developer funding in the initial stages of development. It would be expected that the service will be a commercial service and self-sustaining in the longer term. Suffolk County Council advised that additional services will need to be considered in the context of existing services rather than new services. Suffolk County Council suggest that the route shown in Figure 3.7 should be indicative pending agreement on the configuration of the network and the requirements of a future bus operator.

3.53 One respondent suggested that Figure 3.7 should be amended to show that the bus route through the eastern part of the site be seen as a second phase and that Figure 3.7 should focus on the initial phase. It was stated that Figure 3.7 should also explain what the transport node was.

**Response:** The Development Brief requires the provision of facilities to support a bus route through the site. The exact route will need to be determined in consultation with Suffolk County Council and a future bus operator.

It is unlikely that an extended service through the site will be operational until there is a critical mass of new homes to support it.

Agree that new bus routes should be considered in the context of existing services rather than new services. Given that any bus route will likely involve minor extensions to existing bus routes, it is not considered that developer funding will be required. Any developer contributions to pump-priming a bus service will need to be assessed through transport assessments. Agree that Figure 3.7 is indicative and that further text is needed to clarify that the final route will need to be agreed in the future in consultation with bus operators.

It is difficult to prescribe phases to the bus route at this stage particularly as any figure can only be indicative. It may be that the eastern part comes forward in the short term to serve the employment area associated with the Enterprise Zone and Local Development Order.

**Conclusion:** Remove Figure 3.7 to avoid confusion as any route will need to be agreed in the future with consultation with bus operators. Add text to state that the that bus routes will need to be confirmed in the future in consultation with bus operators.

**Vehicular Network (3)**

3.54 One respondent suggested that the main access road into the site should be completed before the demolition of asbestos buildings on the Brooke
Business Park, Sanyo and Jeld Wen sites in order to avoid asbestos travelling down existing and new residential streets.

3.55 Suffolk County Council advised that the Local Development Order for Riverside Road does not make for provision for a westward extension of Canning Road. Suffolk County Council also advised that they had concerns about the future use of the existing entrance to the former Jeld Wen factory due to poor visibility for traffic travelling westwards along Waveney Drive and wishing to turn right into the site. If this junction was to be used to serve new development a signalised junction would needed. The need for signalised junction would be removed if an alternative access point was provided further eastwards.

3.56 Suffolk County Council stated that the future use of existing access from Victoria Road would need to examined through a Transport Assessment.

3.57 One respondent suggested that a second circular access road that followed the existing cycle route around the employment area should be developed.

**Response:** How asbestos is removed from the site will need careful consideration. It will only be through new development that the access road is delivered, therefore, it is not considered reasonable to require the access road to go in prior to demolition and subsequent development. There may be alternative methods for removing asbestos such as by boat from Lake Lothing. Operations involving asbestos are governed by other regulatory provisions such as the Control of Asbestos Regulations 2012.

The transport guidelines in the Riverside Road Local Development Order are noted, and revisions will need to be made to figures in the Development Brief to reflect these. Agree that access road into the Jeld Wen Factory site should ideally be moved to the east.

The suggestion for a second circular access road that goes along the waterfront is not supported. There is no clear the need for such a road and it would undermine the objective of a traffic-free pedestrian and cycle route along the waterfront.

**Conclusion:** Amend figure showing road network to reflect Suffolk County Council’s comments.

Standards for roads going through employment areas (2)

3.58 One respondent suggested that the Council should give consideration to defining the standards for roads only serving employment areas. Another respondent stated that roads going through employment areas should allow provision for wide loads and limit on-street parking and cycle lanes.

**Response:** Guidance for roads servicing employment areas is found in the Suffolk "Industrial Estate Roads: Notes for Guidance of Developers" this document is referenced in the Brief.

It will be important to ensure there is adequate cycle and pedestrian access into employment areas to ensure people have the ability to choose more sustainable methods of commuting to work. Figure 3.5 shows an off-street
cycle path in the industrial area, which connects into the wider cycle network to ensure safe use.

**Conclusion:** No changes necessary.

---

### Car Parking (9)

3.59 A number of respondents questioned whether enough car parking would be provided on the site and whether garages would be provided. It was also questioned whether public parking provided and if there would be space for delivery vehicles.

3.60 A specific question was asked whether public parking would be provided at the pedestrian bridge for people from South Lowestoft to park to access Normanston Park.

3.61 Concern was raised whether the primary school would include drop off / picking up space for cars. The respondent believed that such provision would encourage car use.

3.62 Suffolk County Council advised that they were updating their Advisory Parking Standards in collaboration with the District Councils.

<table>
<thead>
<tr>
<th><strong>Response:</strong></th>
<th>There will be adequate parking provided for cars in accordance with the latest Suffolk Advisory Parking Standards. This will ensure an appropriate amount of private and public parking is provided.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>There will be no specific car parking provided at the pedestrian bridge. The purpose of the pedestrian bridge is to encourage walking and cycling and specific car parking will undermine this by encouraging people to drive to the bridge if their destination is just across the other side of the bridge.</td>
</tr>
<tr>
<td></td>
<td>The primary school will have no drop off / picking up facility or parking for parents.</td>
</tr>
<tr>
<td></td>
<td>It is noted that the Suffolk Advisory Parking Standards are being updated.</td>
</tr>
<tr>
<td><strong>Conclusion:</strong></td>
<td>Remove detail on parking standards as these may change with any revisions to the current Suffolk Advisory Parking Standards.</td>
</tr>
</tbody>
</table>

---

### Impact on Existing Road Network and Need for a Third Crossing (62)

3.63 A number of respondents raised concern about an increase in traffic resulting from the development and impact on already congested roads. Related to this a significant number people suggested there was a need for a third crossing over Lake Lothing.

3.64 Some people suggested that a third crossing should be put in place before any new development takes place on the site. Other people suggested that the Development Brief should identify a corridor or suggested route for the
third crossing through the site. It was argued that this would minimise uncertainty, future potential blight and the need for future compulsory purchase. If not identified in the Development Brief, it was argued that a route should at least be identified before development starts.

3.65 Some respondents suggested that money for the pedestrian / cycle bridge would be better put towards a third vehicular crossing.

3.66 A number of people stated that if a third crossing cannot be achieved, the existing Bascule Bridge should be replaced or upgraded with more lanes. One respondent suggested that any replacement should be located via the most direct route from the South Lowestoft Relief Road.

3.67 One respondent suggested closing Lowestoft Station and stopping trains at both Oulton Broad North and South and providing a bus service from the stations into Lowestoft. They argued that the result of this would provide a ‘Third Crossing’ in the form of the railway bridge over Lake Lothing which could be adapted along with the existing railway lines to provide traffic relief.

3.68 One respondent suggested that the location of the proposed pedestrian / cycle bridge was the ideal place for the third vehicular river crossing and that the whole of that particular area should be earmarked for that crossing.

3.69 One respondent suggested a tunnel under Lake Lothing would be best way to provide an easier access for A12 through traffic as well as provide for the full and unhindered growth potential for the Lake Lothing sites.

**Response:** The Council appreciates the concerns about the impact of the development on the local road network. Evidence, undertaken to inform the Lake Lothing and Outer Harbour Area Action Plan, suggested that without town-wide traffic reduction measures congestion could increase as a result of the development. The central location of the site and the services provided such as retail facilities, a primary school, and leisure facilities should help limit car journeys. Additionally, the proposed pedestrian / cycle bridge together with the network of cycle paths and bus route through the site will also help limit car use. The Council will continue to work with Suffolk County Council to pursue other off-site traffic reduction measures to help reduce the impact of this development and others in Lowestoft. There is an ongoing need for new homes and employment development in the town. The Council considers that this site, given its central location and good accessibility is one of the most suitable sites to deliver this growth and will have the least impact on congestion.

The Core Strategy and the Lake Lothing and Outer Harbour Area Action Plan were found sound and subsequently adopted on the basis that the delivery of the Plans including the proposals for the regeneration of Lake Lothing were not dependent on the third crossing being in place. The third crossing remains a long-term aspiration of the Council. However, there is currently no funding available for the crossing and there is unlikely to be in the foreseeable future. The Council and its partners are working on other projects which aim, to reduce congestion in the town.

**Conclusion:** No changes necessary.
Open Space and Biodiversity

Provision of Open Space and Facilities (13)

3.70 Several comments emphasised the importance or recreational access to the waterfront. This included the need to incorporate open spaces and facilities that would support a range of activities and provide links between different spaces.

3.71 One representation suggested that the central open space be registered as a village green.

3.72 There was uncertainty about the type of facilities that would included within the open spaces such as changing rooms on the sports pitches and play spaces for children. It was suggested that a fenced space for dogs could be identified to keep the wider green space free from dog fouling.

3.73 One representation suggested that open space located at the entrance of the site where the proposed access road meets Waveney Drive would create a positive entrance to the site and a sense of openness. Otherwise, the entrance could simply appear to lead into a housing estate. Similarly, open space located where the proposed pedestrian bridge meets the Brooke Peninsula should be considered.

3.74 Several suggestions were made that employment uses should have more green space around them to protect residential properties from commercial uses. The areas of concern were located around the Kirkley Waterfront where the residential areas is located opposite that areas identified for employment uses and areas on the north shore of Lake Lothing. Additional green space would also create better walkways and cycleways through the development.

3.75 A comment was made querying the compatibility of an open space located opposite an area that has retail and residential uses in terms of disturbance, smell, servicing etc.

3.76 A suggestion was made that Figure 3.10 could be amended to show a wider range of open space facilities available in the local area.

Response: The central location of the largest open space and the variety of facilities could support a designation such as a community green. Any such proposal could be considered in the future.

There is an identified shortfall of playing pitch provision in South Lowestoft. It is one of the key elements within the draft Development Brief that if the Jeld Wen playing fields are to be built upon, they must be replaced elsewhere within the SUN. The Council will explore the options available to ensure that quality playing pitches are provided including ancillary facilities.
Playing pitches and play facilities have been identified in the Brief as key components of the central open space, however, the specific layout has not yet been decided. The Council will consider a variety of facilities that could be accommodated on the site that could improve versatility and encourage greater use by people in the local area.

Entrance to the site will be given further consideration. It is envisaged that the road accessing the site will be lined with trees and green verges to create a sense of openness. However, the provision and design of open space at the junction of Waveney Drive and the access road will be considered further as it would be beneficial for local amenity.

The existing green space on the north bank is outside the remit of this Development Brief. The green spaces shown in the draft masterplan are indicative and only represent particular spaces. Other green measures including trees, scrubs, walkways, verges etc. will be included as part of a detailed planning application submitted by a developer.

The proposed retail area will have a limited number of shops to support the local community. The Brief has stated that new retail provision is not to provide competition to the Lowestoft or Oulton Broad shopping areas. Small ground level retail units with residential accommodation above is common practice in Waveney and elsewhere. Restrictions on the type of retail use could be implemented through planning conditions if there are concerns over potential impacts on local amenity.

A multi-purpose outdoor space that could be used throughout the year would be beneficial to the local area and should be designed for local use. A location that would maximise local amenity and the setting of Lake Lothing to encourage greater use of the area has been identified in paragraph 3.4.3. The potential for cultural events such as performing arts area has been identified in identified in paragraph 3.4.18. The scale of any such provision would need to be designed at appropriately to reflect the local community and be available for multiple uses during summer and winter.

**Conclusion:** An indicative sketch will be used to illustrate a possible approach to the inclusion of open space and landscaping at the entrance of the site.

Reference to facilities to accompany particular open spaces will be made where appropriate. Reference will also be made to the Open Space Supplementary Planning Document which outlines the provision of open space and related facilities.

A sketch will be prepared that sets out an indicative layout of the central open space to provide greater clarity on what could be provided and how different facilities relate to each other.

Figure 3.10 to be amended to show playing pitch provision and skate park.
Open Space on the Waterfront (9)

3.77 Several respondents suggested that a greater number of open spaces should be provided along the waterfront (in place of the identified housing). This could be enhanced with trees, shrubs. The waterside path should link Oulton Broad with the Bascule Bridge and provide a route for cyclists and pedestrians. Ancillary facilities such as seating should be provided for rest and recreation. Increased waterfront access through a linked network of well designed spaces will create a more memorable place to be, increase local tourism and improve areas for wildlife.

3.78 The Ipswich Docks area was suggested as a good example of waterside development but it could have been improved with a greater amount of open space provision.

3.79 A comment was made that safety must be considered along the waterfront to protect young children.

3.80 Two responses suggested the need for an outdoor area that could be used for multiple uses such as performing arts.

Response:
Open spaces identified in the brief are indicative at this stage and greater details will be provided as part of any planning application submitted by a developer.

The waterfront path will link Oulton Broad and the eastern end of Lake Lothing and have a variety of spaces consisting of both green and paved areas. It will be designed to improve views across Lake Lothing to other areas of Lowestoft and increase access to the CWS and other landmarks within the SUN. The path will increase local amenity and assist with the creation of a place people will want to visit and enjoy reflecting the positive attributes of Lowestoft.

Lake Lothing is one of the most important features of the area that has been integral to the town’s history. It is important that the community is given the opportunity to reconnect with this geographical asset. To encourage people to use the path, it is important that the path relates well to Lake Lothing, new dwellings and employment uses.

A community open space located where the proposed pedestrian bridge meets the Brooke Peninsula may be isolated have a limited amount of potential for multiple uses. However, identifying an area of shared use amenity space would be beneficial to this particular area.

The potential for performing arts area has been identified in paragraph 3.4.18.

Conclusion: Greater detail about the waterfront path will be set out.

Greater clarity will be provided that states the open spaces shown within the development area are indicative. The details will be finalised as part of
3.81 Natural England and the Broads Authority commented that potential impacts on the development should be considered throughout the development process. It was also suggested that a biodiversity strategy should be prepared to provide guidance for the development to ensure spaces are integrated and well linked to support existing biodiversity in the area and encourage new wildlife to colonise any newly developed area.

3.82 Natural England and the Broads Authority support the provision of green space within the SUN and Kirkley Waterfront area to enhance the ecological network. They state that the provision of open spaces will divert pressure away from more sensitive areas. It was also stated that green infrastructure should be an integral part of the creation of sustainable communities by creating new opportunities to access open space.

3.83 The County Wildlife Site is designated for its ecological importance. Natural England and the Broads Authority stated that protected species may be affected by increased public access. It was suggested that as part of any planning application, a detailed ecological assessment undertaken by a qualified ecologist should be undertaken in accordance with IEEM (Institute of Ecology and Environment Management) guidelines.
3.84 One representation queried if expert advice had been sought about the CWS.

3.85 Several representations stated their concerns that the CWS may not be protected from development. It was also suggested that the CWS could be extended to create a greater buffer between employment and residential uses and provide more recreational activities in the vicinity of the waterfront.

3.86 A couple of comments were submitted stating that the CWS was of little value because it is so small and that the brief overall highlights a lack of green space for wildlife in the area. Proposals to remedy this do not seem to be very imaginative.

3.87 Natural England suggested the path width through the CWS is kept to an absolute minimum and that there is no lighting of the route to minimise the disturbance to the site. The path being kept away from the natural shoreline was also supported. Any proposals relating to the CWS need to be discussed with the County Council ecologist to ensure development is not to the detriment of the resident species. A query was also raised asking if the path going through the CWS would be accessible to those disabilities.

3.88 One respondent questioned what was proposed to deal with the gulls who currently use the former Jeld Wen sheds as a nesting site.

3.89 It was suggested that there would be interest from local wildlife organisations in providing nest boxes for birds in appropriate locations in the CWS to support biodiversity.

3.90 Suffolk Wildlife Trust supported educational benefits of the CWS site but did not support some of the site being incorporated as part of the primary school land.

Response: Lowestoft has a number of ecologically important areas that are important for wildlife including a number of international, national and locally protected areas. The built up area of Lowestoft boarders the Broads which are of national significance for flora and fauna. Lowestoft has been identified as having brownfield sites that support a diverse variety of wildlife. These sites of ecological importance will be given greater emphasis in the Development Brief.

There are no proposals to relocate the existing CWS. The Brief seeks to ensure important ecological sites are protected and the green infrastructure network is enhanced by improving linkages between areas that support wildlife within the proposed development site and surrounding areas. The Habitats Regulations Screening Report (2010) for the draft Lowestoft Lake Lothing and Outer Harbour Area Action Plan showed that there will be no significant impacts on any Natura 2000 sites.

The suggested need for an ecological survey of the CWS has been noted. An ecological assessment of the Brooke Yachts and Jeld Wen Mosaic was undertaken by the Suffolk Wildlife Trust in 2007 resulting in its designation as a CWS. The protection of the site is discussed within the Development Brief and it is proposed to increase public access to the site to encourage
more public awareness and better maintenance greater public access. Greater community involvement could also enhance the quality of the site using community initiatives such as bird boxes.

Support from Natural England is acknowledged and the Council will discuss proposals with the County Ecologist further to ensure access for all can be achieved without any detrimental impacts to the CWS, including discussions on the width of the path and surfacing to ensure it can be used by all members of the community. The support for the site to be used for educational benefit but not to have land identified as part of the CWS included within the school boundaries has been noted.

Any proposals to extend the CWS beyond its current boundaries are likely to be difficult because much of the site is in private ownership and a balance between open space provision, including areas for wildlife, housing, employment and community facilities needs to be struck the ensure the development is viable. Expanding the CWS may compromise future development of the site overall.

Sea gulls are a protected species. Demolition of existing buildings will need to avoid the nesting season, however, nest removal after this period will result in less nesting sites therefore reducing the number of gulls in the area.

**Conclusion:** The importance of Sprat’s Water, Oulton Marshes and Natura 2000 sites will be made more explicit. The designation will be represented on the map in Appendix 1 showing the wider ecological network in the Lowestoft area.

Greater clarification about lighting will also be provided.

The requirement for an ecological assessment for any development proposals will be listed along side other planning application requirements.

---

**Representation of protected sites (2)**

3.91 The Broads Authority suggested that the Broads Administrative Area should be shown on maps to reflect its proximity to the development and its importance as a designated landscape. It was also suggested that it would be helpful if the boundary between the Broads Authority Administrative area and Waveney District Council’s planning area were shown on the maps.

3.92 The Suffolk Wildlife Trust suggested that the County Wildlife Site should be identified as a separate character area in Figure 3.14.

**Response:** The Broads are a designated landscape and it is agreed that this should be made more explicit in the brief. It is appropriate to identify the Broads Authority Administrative area on the map that sets out the context of the SUN and Kirkley Waterfront in the wider local area.

**Conclusion:** The Broads Authority Administrative Boundary will be shown
in new Figure 2.1.

The County Wildlife Site will be presented as its own Character Area in the Urban Design section.

Design

Conservation Areas and PRoWs (2)

3.93 Two respondents stated that development should consider the presence of visual receptors likely to be sensitive to the development proposals including Conservation Areas and Public Rights of Way.

Response: Proposals will need to reflect qualities of the local area which includes both the built and natural environment. This is supplemented by Figure 3.15 which shows potential locations of landmarks and views to ensure the development relates well to its surroundings. Creating a network of high quality and legible walkways and cycleways throughout the development is an important element of the Development Brief to achieve the long-term objectives.

Conclusion: No changes necessary.

Access to the waterfront for employment uses (3)

3.94 Several respondents stated that access to the waterfront was essential for commercial activities.

3.95 Concerns were raised about the compatibility of commercial activities and public access.

3.96 Associated British Ports commented that some areas identified for public access were appropriate, particularly in the vicinity of the marina. As the joint operating port authority ABP would like to agree with the Council where waterfront access was appropriate.

3.97 It was also commented that in areas where there was shared use on private land, and a conflict did arise, it was hoped that priority would be given to the commercial user.

3.98 One representation stated that the development needed to include the other harbour areas.

Response: The proposed development in the area identified as the SUN and Kirkley Waterfront is one of nine strategic areas identified for development in central Lowestoft as part of the Area Action Plan. The waterfront along the south shore of Lake Lothing is currently under used although it has been, and still is, an essential part of Lowestoft's economy. Areas along the waterfront have been identified for employment uses to
ensure that when the port requires additional operating land it is physically available.

Public access to the shore of Lake Lothing is currently very limited. It is a long-term aspiration of the Council to reconnect Lowestoft’s community with one of it’s most important features. This can be achieved through both physical access and visual connections. In areas where there may be a conflict between public access and commercial activities the Council will seek measures that can meet the needs for both the community and commercial operator(s). The Council will consider, in collaboration with port operators, where waterfront access is appropriate and identify solutions that can facilitate public access to the waterfront without compromising commercial activities.

Conclusion: Further considerations will be given to how commercial operations and public access to the waterfront can co-exist. Greater clarity will be ascertained as development proposals are brought forward.

Amenity Issues (7)

3.99 Concerns were raised over several issues that could impact on existing and new residents and business in the area. These included:

- Dust;
- disposal of demolition materials such as asbestos and their transport through existing residential areas;
- blight;
- heavy vehicle activity;
- views;
- overlooking.

3.100 Several responses raised significant concerns about the potential impact of noise originating from marine based industries impacting on new residential development. There is concern that if complaints are lodged by new residents against existing industries on the north shore then the industries will be held responsible for making changes to accommodate these complaints. This is despite the fact that the marine industries on the north shore were located here before this residential development and this will place commercial operators at risk. It was suggested that the use of covenants as discussed in the brief to ensure new development was mitigated the impact of noise would not be enforceable.

3.101 Concern was raised over the Environmental Statement completed in 2007. It was stated that noise assessments should have been undertaken as part of an EIA when the site was allocated to alleviate such issues when a planning applications are submitted.

3.102 One response suggested that some of the impacts of development could be reduced through the use of planted trees.

Response: It is a key objective to create a place where people want to live. Negative impacts on local amenity such as dust, movement of demolition
materials and heavy traffic will be required to comply with environmental health regulations and any planning conditions that are imposed as part of any planning permission. North of Lake Lothing in the Harbour Road area, marine and other industries are located in close proximity to residential properties showing that these land uses can be compatible in the area.

In the past, businesses operating in the SUN area generated significant volumes of HGV traffic. Much of the predicted vehicular traffic associated with new development in the SUN area will not be HGV vehicles. This new traffic is unlikely to be create greater impacts than experienced in the past. New infrastructure that is designed to accommodate additional vehicular traffic, provide links for pedestrians and cyclists and to improve access to the waterfront is to be provided for new and existing residents and businesses that would not otherwise be delivered.

Construction issues will need to be mitigated by developers to minimise disruption for existing residents and businesses which might make the development unacceptable otherwise.

The use of landscaping and trees will be used in the development to create an attractive environment and improve local amenity. A network of pedestrian and cycle routes as well as some of the roads will be designed to incorporate trees and create a network of green routes through the development.

Overlooking can be an issue for existing properties. Plot layout and building design are issues that will be considered as part of the design of the new proposed development to ensure negative impacts on residents such as overlooking are minimised. The planting of trees to break the view between properties can also be used to reduce the risk of overlooking.

The requirement for noise assessments is set out in section 4.3 ‘Planning Application Requirements’ and further discussed in paragraph 2.17 of Appendix 1.

**Conclusion:** Further clarification on the need to protect local amenity during the construction phase will be provided in the urban design section. Developers will be encouraged to register with the Considerate Constructors Scheme to reduce potential impact on neighbours during construction.

---

**Urban Design (4)**

3.103 One respondent was uncertain if the path going through the wildlife area would be accessible by those with disabilities, particularly someone in a wheelchair.

3.104 It was suggested that plenty of seating should be provided. The seating provided along the South Beach promenade was very popular.

3.105 It was suggested that elements of crime could be designed out as part of the development.
3.106 Plot layout should be used to create a quality development. Examples of developments in the area have no frontages bordering onto the footpaths (in some cases there are no footpaths either) and this makes the area look awful. Consideration should also be given to spacing between dwellings and the use of private gardens.

**Response:** Street layout and the layout of building plots are key to creating a quality street scene. Footpaths will be required throughout the development to encourage people to use other transport modes than the car. Spaces between individual buildings and along building frontages will be sought where possible.

Parking spaces will be provided within the site for residents using the Suffolk Advisory Parking Standards. It is envisaged that vehicle parking will not dominate the street scene within the SUN. To achieve this, a variety of vehicle parking design measures will be issued which could include parking spaces under buildings (which acts to mitigate flood risk), providing parking spaces within perimeter blocks and allowing spaces behind dwellings. The appropriate type of type of car parking will reflect building design, site layout and characteristics of the site.

**Conclusion:** The importance of design can be made more explicit in paragraph is given more emphasis. This includes explicitly stating the need for seating along the waterfront and furnishings in public open spaces, further information about the path through the CWS including wheelchair access, path width and lighting. Reference is also made to the initiative titled ‘Secured By Design’ which seeks to inform development proposals about approaches to design out crime and increase safety.

Heritage and Archaeology (1)

3.107 Suffolk County Council Archaeology stated that a detailed cultural heritage desk-based assessment should be undertaken in order to understand the archaeological and historic significance of this area. They stated that two buildings, the former offices of the East Anglian Ice Works and The Sanyo factory building, were identified as locally significant in the Cultural Heritage Assessment for the Area Action Plan. They stated that the Ice Works offices are the only surviving historic structure within the area and that opportunities should be identified for the restoration and reuse of the local heritage asset, which can make a positive contribution to the area while preserving the historic environment.

3.108 Suffolk County Council Archaeology also commented that a trial trenched evaluation and palaeo-environmental assessment should be undertaken to assess the below-ground archaeological implications of any proposals. They suggested that the work should be undertaken at an early stage and incorporated into the Development Brief to ensure any potential remains can be preserved in situ. They stated that the Development Brief should also ensure that proposals for the public benefit of the investigations are included in any re-development of the area such as information panels and museum displays, should material of sufficient interest and importance be defined.

**Response:** It is considered that the Cultural Heritage Assessment prepared for the Lake Lothing and Outer Harbour area Action Plan
provides sufficient background for the Development Brief. It should be noted that the former offices of the East Anglian Ice Works have been demolished since the completion of the Cultural Heritage Assessment.

It is considered that archaeological assessments involving trial trenches would be better carried out as more detailed proposals are worked up as part of planning applications. Agree that the redevelopment of the area should include proposals such as information panels detailing any material of sufficient interest and importance found during the redevelopment.

**Conclusion:** Make reference to including items such as information panels detailing any material of sufficient interest and importance found during the redevelopment.

---

**Energy Efficiency (5)**

3.109 Several responses were received that supported the objectives set out to deliver a development the implemented sustainability measures such as energy and water efficiency.

3.110 One response was received that supported the use of solar panels on new buildings stating these would be cost effective in the long-term.

3.111 One response was received that commented on the use of air and ground source heat pumps saying there were concerns over their practical use in a development such as the SUN. It was also stated that CfSH level 5 for energy was currently unviable.

3.112 Two responses commented that if a community energy scheme was to be taken forward then it would need to be designed into the development from the outset. It was also mentioned that to date no financial appraisals of such a scheme have been included in the development proposals.

3.113 Suffolk County Council suggested that the potential for a community energy scheme could be explored further. Issues that could be considered included:

- a single large energy plant that could be oversized to serve the new development and be expanded in the future to serve existing and new development later
- for economic reasons, a number of smaller energy plants that could provide energy for a smaller number of buildings which could be phased in to the development as the SUN progresses.
- the potential for working in conjunction with an Energy Service Company (ESCo) could be explored.

3.114 Suffolk County Council drew attention to a statement in the 2011 Government Budget that it will make developers accountable for those carbon dioxide emissions that are covered by Building Regulations. This should be considered in light of the proposed allowable solutions and how this may apply to the SUN energy strategy. It was suggested that the Council may wish to consider possible schemes to which compensatory payments to provide more flexibility for developers to meet their obligations and reduce carbon emissions across the District.

**Response:** To achieve the required energy efficiency standards set out in
the brief developers will need to consider options early in the design process. How energy efficiency is to be achieved (building fabric or technologies such as solar panels and heat pumps) has not been prescribed in the document so not to limit flexibility for developers.

The potential for a community energy scheme will need to be further investigated in partnership between developers and the Council to identify issues related to feasibility and viability. An overall energy strategy will need to be identified before planning proposals are submitted and these will need to set out how they will contribute towards delivering the identified strategy. If a community energy scheme is not to be used on site then achieving the energy requirements of Code Level 6 from 2016 will be difficult. It will be important that developers demonstrate how the requirements can be achieved as part of any detailed planning application.

Any community scheme that involves combined heat and power or district heating will likely involve an energy service company (ESCo). If an ESCo is created to provide capital and recoup the profits from energy sales then the Council and developers will need to work together to deliver such a project. This approach is likely to be the most financially acceptable method to reduce carbon emissions in the long-term.

An overview of ‘allowable solutions’ will be included in the text.

**Conclusion:**
Allowable solutions will be in the discussed Development Brief to maximise other opportunities to reduce carbon emissions in the District if they cannot be achieved on site. Reference will be made to the Sustainable Construction and Renewable Energy SPD currently being prepared.

### Water Efficiency (2)

3.115 It was suggested that achieving higher levels of water efficiency in advance of Building Regulations may not be the most cost effective approach. Alternative options could be considered, similar to the proposed allowable solutions for energy, that would enable developments that cannot achieve the required water efficiency on site to provide a financial contribution to install water savings measures elsewhere in the District. This would provide greater flexibility for developers.

3.116 It was also suggested that, as well as being very expensive, the reliability of grey water recycling systems is unproven to date. It was also pointed out that no financial appraisals of such a scheme have been undertaken or put into the public domain.

**Response:** Reducing water consumption in Waveney is a priority for the Council. It is recognised that there are cost implications achieving the standard ahead of Building Regulations. Where achieving the standard is not cost effective consideration will be given to offsetting water use in other ways which may include providing funds to install water saving measures elsewhere in Lowestoft or in other parts of the District. Any such schemes will need to be discussed with different departments within the Local Authority.
**Conclusion:** Alternative options may be considered if viability is an issue. This will be discussed in the Brief.

---

**Freshwater Supply (1)**

3.117 It was suggested that a desalinisation plant to supply fresh water irrigation purposes would be beneficial for the wider area because of water shortages.

**Response:** Freshwater is a significant issue and Waveney has been identified as one of the most water stressed area in England. Desalinisation plants are useful in areas where there is very little access to water making such a facility financially viable. Desalinisation plants are expensive and require significant amounts of energy to sustain the reverse osmosis process. In the case of Waveney (and other areas in the East of England), there are concerns over water shortages, however, a location such as central Lowestoft is not considered appropriate for such a facility.

**Conclusion:** No change.

---

**Recycling and Waste Management (3)**

3.118 The Environment Agency and a member of the public stated that opportunities for recycling in the public realm should be maximised. One comment was hopeful that recycling facilities would be available within the new development area.

3.119 Suffolk County Council forwarded information that stated the Government would no longer be requiring developments larger than £300,000 to prepare a Waste Management Strategy for the development. It was also suggested that the wider issues of sustainability during the construction phase of the development such as recycling of aggregates on site could be discussed further.

**Response:** Recycling facilities will be provided within the SUN through the District Council’s waste collection scheme. Community recycling facilities are currently available at ASDA several hundred metres east of the SUN. Additional community recycling schemes will be considered in the future. The Government’s intention to remove the requirement for Waste Management Plans has been noted.

**Conclusion:** The potential for recycling created by an additional 1500 households in the area will be made more explicit in the Brief. Waste and the wider issues of sustainability will be made more explicit in the Vision and Objectives section.

The reference to the requirement for Waste Management Plans will be removed. Waste Management Plans will still be encouraged.
### Sustainable Urban Drainage Systems (SuDS) (4)

3.120 Natural England commented that SuDS schemes should be designed to support multiple uses in addition to drainage. There is an opportunity any new system to be part of a more expansive green infrastructure network and enhance biodiversity.

3.121 Suffolk County Council stated that they will be the SUDS Approval Body from October 2012 and that developers should contact the County Council early in the design process to discuss proposals.

3.122 One respondent stated that Suffolk County Council will become the SUDS Adopting Authority in 2012 and it would be useful if the County Council would start addressing the necessary construction standards for adoption now.

3.123 The Environment Agency commented that SuDS could be an important design feature used to enhance the public realm and provide multiple environmental benefits such as biodiversity and climate change mitigation. When considered early in the design process, SuDS can be a cost effective way to manage surface water flooding. Examples can be provided.

3.124 The Environment Agency suggested that greater reference could be made to SuDS in the open space section of the document.

| Response: | The need for greater clarity in related to delivering any SUDS scheme is noted. |
| Conclusion: | No changes necessary |

### Biological Waste (1)

3.125 It was suggested by one respondent that for a truly sustainable design, we should also be looking at the reuse of human waste as a way of improving soil quality. The respondent pointed to successful examples in Sweden.

| Response: | Whilst this may be technically possible, central Lowestoft is not considered to be an appropriate location for this particular form of sustainable development. |
| Conclusion: | No change. |

### Flood Risk Management

**General Concerns (5)**

3.126 A number of respondents raised concerns about flood risk and whether new properties would be protected from flooding. Concern was also raised that development may increase flood risk elsewhere and may cause pollution. It
was suggested that building should be built on higher ground, on stilts or behind a flood wall.

3.127 A few respondents also questioned whether new properties would be able to obtain insurance. The Environment Agency advised that the Government and the insurance industry are currently in discussion over the provision of flood insurance and that the current commitment to provide flood insurance for domestic properties at risk from flooding does not apply to any new property built after 1st January 2009. The Environment Agency advised that failure to obtain insurance would mean it would be difficult to sell properties on the site. They advised that the elevation of finished floor levels reduces the likelihood of the property itself suffering from flooding and therefore is important as to whether insurance could be obtained. The Environment Agency also advised that in light of the above it would be worth considering the elevation of commercial buildings and the approach should be in line with agreed Local Development Order for the site.

3.128 The Environment Agency advised that as Lake Lothing is classified as a “Main River”, any structures in, under or over Lake Lothing will require a Flood Defence Consent from the Environment Agency. They also advised that any erections or works within 9 meters of the edge of the river will require consent under the Anglian Region Land Drainage and Sea Defence Byelaws.

Response: Before any development can proceed on the site, detailed, site-specific, flood risk assessments will be needed that will need to demonstrate that an adequate level of protection is provided to new properties in accordance with the National Planning Policy Framework and that flood risk is not increased elsewhere.

Availability of insurance will be key to ensuring a viable development. Further text will be needed to explain this and reference made to the recent ABI publication “Guidance on Insurance and Planning in Flood Risk Areas for Local Planning Authorities in England”

Reference also needs to be made to commercial development in Section 3.6.

Reference could be made to other consents needed as identified in the Environment Agency Response.

Conclusion: Amend Flood Risk Management section to make reference to flood insurance and other consents required.

Flood Risk Evidence (3)

3.129 One respondent raised concerns about the reliability of the original Flood Risk Assessment and that another should be commissioned by a different organisation before the project moves forward.

3.130 The Environment Agency advised that they are currently commissioning a new 2-Dimensional flood model for the Lake Lothing area. Whilst they have not received any formal outputs of this modelling, they advised that the initial
drafts indicate that this northernmost part of the site could be at frequent risk of flooding (in the current 1 in 20 year tidal flood event).

3.131 It was also questioned whether the new flood model for Lake Lothing may allay the Environment Agency concern about part of the Sanyo site acting as a conveyance route.

**Response:** All planning applications for development within the Sustainable Urban Neighbourhood and Kirkley Waterfront site will require flood risk assessments to be prepared. If the revised flood-model for Lake Lothing is available these Flood Risk Assessments will need to take it into account.

**Conclusion:** No changes to the document necessary at this stage.

**Sequential Approach (1)**

3.132 The Environment Agency questioned whether the sequential approach had indeed been followed as claimed in paragraph 3.6.1. The Environment Agency stated that the high density residential development proposed on the northern-most part of the site seemed contrary to this approach as this area was subject to high frequency flooding and also in the 1 in 1000 year event would be subject to high hazard flooding. However, the Environment Agency in their response, drew attention to paragraph 103 of the National planning Policy Framework which states “within the site, the most vulnerable development is located in areas of lowest risk unless there are overriding reasons to prefer a different location”. They suggested that the Council might want to consider the land raising study, economic reasons etc when considering whether the northern most area of the site is the appropriate location for the highest density housing.

**Response:** The Council believes that it has considered the sequential approach when defining land uses in the Outline Masterplan. This is demonstrated by proposing open space in the area of the most frequent high hazard flood area on the northern part of the Sanyo site and proposing employment in the eastern part of the site where there are pockets of high hazard flooding. Although it is appreciated that the sequential approach has not been strictly followed in terms of housing density. The only part of the site which is not subject to frequent flooding (1 in 20 year) or high/medium hazard flooding is the Jeld Wen Playing Fields site where it would not be appropriate to have higher densities due to the character of the surrounding area.

**Conclusion:** Amend text in paragraph 3.6.1 to better clarify the Council’s approach and justification.

**Flood Risk Mitigation Methods (5)**

3.133 The Environment Agency suggested that land raising is flood mitigation rather than a ‘flood defence’ as mentioned in paragraph 3.6.2. The Environment Agency also stated that land raising, as a mitigation option, could be quite important given the frequency of flooding on site in low return events and the
restrictions on developments that are appropriate in such areas. They suggested that land raising also provides opportunities for innovative design.

3.134 The Environment Agency suggested that the term ‘dry refuge’ in paragraph 3.6.3 should be replaced with ‘place of safety’.

3.135 The Broads Authority raised concern about flood risk. They stated that land raising should only be permitted where it can be demonstrated that it will not result in increased pollution or increased flood risk, or changes in water levels upstream of the site in the Broads. One respondent raised concerns that partial land raising of the Brooke Peninsula / Brooke Business Park without raising the Sanyo site would exacerbate an existing ‘sink’ and trap flood waters increasing flood risk on site. They suggested that comprehensive land raising or defence of the whole site should take place. They suggested that this would remove the need for the sequential approach to land allocation and provide overland flow routes across the development area catering for on and off site flow paths.

3.136 One respondent questioned whether it was appropriate to allow car parking in the 1 in 20 year flood zone. They also raised concerns about the approach proposed in Figure 3.16. They raised concerns that ramped access would be needed to rear parking areas and in times of flood, rear parking areas in perimeter blocks would become lagoons as the water would get trapped there. They also stated that ramped access to the rear of dwellings would be space hungry.

**Response:** Agree that land raising is flood mitigation rather than defence and agree with change of phrase from ‘dry refuge’ to place of safety.

The Cumulative Land Raising Study demonstrated that the land raising of the Brooke Business Park site would not impact on flood risk elsewhere. Site specific flood risk assessments will need to demonstrate that land raising in other areas of the site not tested by the Cumulative Land Raising Study will not increase flood risk elsewhere.

The brief does not suggest that car parking should be allowed in the 1 in 20 year flood zone. As the roads that wrap around the perimeter block will be above the 1 in 200 year flood level there will be no risk of water entering except in the most extreme flood events (1 in 1000 year event). In these situations design solutions that allow water to flow out of the internal areas of the perimeter block could be incorporated. The ramps into perimeter blocks would not be too space hungry the as raised level of the streets and buildings only have to be on average 1m higher to be outside of the 1 in 200 year flood event.

**Implementation**

**Phasing (1)**

3.137 One respondent suggested that details on the phasing of development are fundamental to the delivery of the site. They suggested that more information on viability, infrastructure requirements, site constraints, timescales, and
funding mechanisms were needed. They stated that any phasing plan needs to be supported by a robust a flexible delivery strategy.

3.138 It was stated, with reference to paragraph 3.2.11, that the site is highly likely to come forward through multiple planning applications reflecting the multiple landownerships rather than just one application. As such it was suggested that the Development Brief should set out parameters for managing this process.

**Response:** It is agreed that a phasing strategy is very important to help guide development. It is also agreed that further work is needed to inform a phasing strategy including high level transport work to understand when a new access route is needed for the western part of the Sustainable Urban Neighbourhood and Kirkley Waterfront site.

It is agreed that it is highly likely that the site will come forward in multiple ownerships and that the Development Brief should be more explicit in setting out the parameters for managing this.

**Conclusion:** A Phasing Plan supported by evidence will be included in further drafts of the Development Brief. Additional text will be added on how the site can be delivered through multiple planning applications.

---

### General Infrastructure Comments (13)

3.139 Concern was raised that infrastructure may not be delivered in parallel with development and questions were raised about the phasing of infrastructure provision such as the pedestrian bridge.

3.140 A number of respondents requested that the Development Brief prioritised the various infrastructure requirements. One respondent suggested that the pedestrian / cycle bridge should be the lowest priority as they remained unconvinced of its merit.

3.141 Suffolk County Council also stated that they would support the intention to work towards some form of infrastructure prioritisation. Suffolk County Council suggested that primary school could be delivered on a phased basis and only to a size that is necessitated by pupil yields from the new catchment (which they currently propose to match to the boundary of the SUN).

3.142 Some respondents requested that the Development Brief clarify whether the provision of affordable housing on the site would be given greater priority than the provision of social infrastructure.

3.143 One respondent suggested greater clarity is needed in the document to anticipated sources of other funding for infrastructure and level of provision which might be achievable, in order to give some greater certainty as to the viability and deliverability of the development.

3.144 One respondent argued that the pedestrian bridge is a site specific requirement and should be subject to Section 106 provisions from the site and should not be funded from wider developer contributions through CIL. The same respondent raised an objection to funds collected through the
proposed Community Infrastructure Levy being used to fund infrastructure within the Sustainable Urban Neighbourhood and Kirkley Waterfront site in principle. They were concerned that this could give a competitive advantage to developers on the site and could be contrary to EU laws on state aid.

3.145 A number of respondents suggested that the apparent ‘Grampian’ condition in paragraph 4.2.11 that states the pedestrian / cycle bridge should be in place prior to the completion of all residential units. Particularly as it is suggested that the bridge will be dependent on other sources of funding in addition to developer funding from the Sustainable Urban Neighbourhood and Kirkley Waterfront site. It was suggested that the text could disincentivise the completion of the development. One respondent suggested that paragraphs 4.2.10 to 4.2.13 should therefore be removed from the document.

3.146 One respondent suggested that paragraph 4.29 is amended to make clear that any contributions towards off-site secondary school provision relate to the proportion of pupils arising from the SUN development that are likely to use the school, and not based on the number of dwellings provided (which might not all accommodate children).

3.147 One respondent questioned whether any public toilets would be provided on the site.

3.148 It was questioned whether there would be sufficient water supplies for the development and whether the sewerage system would be able to cope.

3.149 Suffolk Wildlife Trust suggested that it was essential that Section 4 should include details on how the County Wildlife Site will be managed and how it will be funded and delivered through the proposed development.

3.150 Natural England raised concerns about potential funding constraints associated with the funding of infrastructure. They suggested that the environmental impact of any failure to deliver the necessary infrastructure should be considered as part of the wider Environmental Impact Assessment of the development.

3.151 One respondent questioned the need for a new primary school when there was already one (Dell Primary School) in close proximity to the site.

3.152 One respondent questioned whether high-speed broadband will be provided across the site.

Response: It is appreciated that this section needs greater clarity with respect to phasing and prioritisation of infrastructure delivery. It is considered that all infrastructure requirements listed in Section 4 will help make the site a sustainable development that promotes healthy lifestyles and preserves and enhances the local environment. Any prioritisation and phasing has to be kept flexible in the Development Brief to ensure the document can accommodate changing circumstances such as the availability of funding for different types of infrastructure. The same applies to affordable housing.

The pedestrian / cycle bridge will not only benefit development in the Sustainable Urban Neighbourhood and Kirkley Waterfront site and
therefore it is appropriate that contributions from wider developments through the Community Infrastructure Levy will be applied to the bridge. Transport modelling undertaken to support the Lake Lothing and Outer Harbour Area Action Plan demonstrated that only 80% of the development proposed in the Area Action Plan area (when considering other planned development in Lowestoft) could be accommodated if town-wide traffic reduction measures are not implemented. The pedestrian bridge will improve north-south connections in the town for journeys made by foot or cycle and will therefore help reduce the overall traffic impact from all new development across the town.

The purpose of the Community Infrastructure Levy (CIL) is to help deliver new development in a timely fashion that is supported by infrastructure. Therefore it is justified to spend funds on infrastructure to deliver new development. Similar to public funding, the CIL funds will not be used to subsidise developers to give them a commercial advantage. CIL will not be used to fund infrastructure where it will deliver developer profits above normal levels or where it will support historic or higher than normal residual land values for landowners. However, CIL similar to other public funding could be used to help unlock development sites early where viability is a problem and where infrastructure on or near those sites brings wider benefits to other developments. CIL intentionally breaks the link between a development and specific infrastructure provision to enable Council’s to apply the funds flexibly to deliver current priorities. The Council is currently working up methods on how future CIL receipts will be spent and prioritised. The Council will need to ensure that a balanced approach is taken to ensure that infrastructure across the District is funded and delivered. The text of the Development Brief could be clarified to reflect this.

It was not the intention for paragraph 4.2.11 to seek to impose a ‘Grampian’ condition which would restrict the full development of the site. It is agreed that a ‘Grampian’ style condition would be an unreasonable approach. The text is paragraph 4.2.11 is not clear and should be amended as appropriate.

Suffolk County Council have advised that there will be no need for off-site contributions towards secondary school provision. Therefore, amendments to paragraph 4.2.9 would not be needed as suggested by the respondent.

In terms of public toilets, it is unlikely that the Council will choose to build new public toilets within the site. If there is felt there is a need the Council will look to implement a community toilet scheme, where restaurants, bars or cafes on the site make their toilets available for the public. The Council will then pay the company a commuted sum to cover maintenance. The Council is currently planning to build its own offices in the eastern part of the site on Riverside Road, public toilets my be provided as part of this development.

With respect to water supply, The Waveney and Great Yarmouth Joint Water Cycle Strategy Scoping Report identified that there will be surplus water resources in the area through to 2020/21 with slight deficits by 2025/26 when taking into account growth levels. Essex and Suffolk Water have raised no issues with respect to water supply through the plan making
process and the Water Cycle Strategy states that they have a number of programmes in place to overcome uncertainty about future resources. Anglian Water have confirmed there is capacity at the Wastewater Treatment Works to accommodate this development but have advised there will likely be a need for some site-specific sewerage network improvements to accommodate the development.

A County Wildlife Site Management Plan would be beneficial to improving access to the site and enhancing its quality as a habitat for wildlife. These details are best set out as part of a planning application when greater detail is provided. This will be referred to in the Brief.

It is agreed that when assessing the environmental impact of schemes, studies will need to consider the impact on the environment both with and without any infrastructure being in place if it is at risk of not being delivered due to financial constraints. This will be particularly relevant to transport assessments and the pedestrian / cycle bridge.

The level of development proposed in the Sustainable Urban Neighbourhood and Kirkley Waterfront will exceed the level of capacity available at Dell Primary and other nearby schools. Therefore a new primary school will be needed on the site.

The Council will encourage developers on the site to provide high-speed broadband for residents and businesses. Provision of high-speed broadband should help make it easier for developers to market the site.

**Conclusion:** Provide further text on phasing and prioritisation of infrastructure requirements. Clarify text with respect to the use of the Community Infrastructure Levy. Amend text to make clear that development will not be restricted until the completion of the pedestrian / cycle bridge. Add text about high speed broadband in Site Specific Infrastructure section.

Text will be provided that requires details of how the County Wildlife Site will be integrated into the development and maintained in the future.

### Viability (4)

3.153 A number of respondents raised concerns about the financial viability of the development.

3.154 One respondent stated that in light of viability concerns a risk assessment will be needed to ascertain whether the development can fund the necessary infrastructure itself. The respondent believed that based on evidence to date it was unlikely that the development could viably deliver all the infrastructure required and therefore could not meet the requirements of an LDF allocation. It was also suggested that recent viability evidence had not included the cost of the access road and sewerage upgrades.

3.155 One respondent suggested that the scheme was unviable and that there other more suitable sites that could deliver housing in the District.
3.156 Suffolk County Council suggested that as the scheme will be developed across a number of economic cycles a phased approach to viability should be applied.

**Response:** The Council appreciates that the viability challenges that this site presents. The most recent viability evidence in the CIL Viability Study (BNP Paribas, 2012) confirms that the development is viable but would struggle to deliver necessary social infrastructure requirements and affordable housing in today’s market. The results of this viability study means that it will be difficult for the Council to apply the Community Infrastructure Levy to the whole site, which as a fixed charge will likely make the development unviable.

The Council will continue to work with the relevant parties to address the issue of viability using a phased approach of deferred contributions (overage) through the Section 106 regime as suggested by Suffolk County Council. This will allow the Council to take further contributions towards infrastructure as viability improves in the future. According to the CIL Viability Study, a 10% increase in sales values above build costs would likely mean that the development could viably deliver the primary school, open space and 10% affordable housing together with an approximate £740,000 contribution to the pedestrian / cycle bridge. Further, more detailed viability studies will be worked up with landowners and developers to ensure a deliverable solution is found.

The access road is considered as part of the normal external development costs that a scheme would have to cover as it will essentially be an estate road. Therefore it has not be identified as an additional abnormal cost in viability studies undertaken to date. The requirement for a signalised junction at the end of the access road has been modelled as an abnormal cost. The nature of sewerage improvements is not yet known and won’t be known until detailed schemes are worked up. There is no indication that these costs would be abnormal at the moment for this type of development.

**Conclusion:** Clarify process to dealing with viability issues in Section 4, in particular deferred contributions and make reference to the CIL Viability Study (BNP Paribas, 2012).

---

3.157 The Highways Agency and Suffolk County Council stated that travel plans should be required alongside Transport Assessments.

3.158 Suffolk County Council advised that an air quality assessment will also be necessary given the concern over the air quality issues (traffic related) at the Bascule Bridge. Suffolk County Council referred to the new Suffolk-wide guidance.

3.159 Suffolk Wildlife Trust advised that any planning applications should include an appropriate ecological assessment of each part of the site, including
assessment of the cumulative impacts of development. They advised that although the CWS is likely to represent the main area of ecological importance within this area there is also the potential for other parts of the wider site to support important biodiversity.

**Response:** It is agreed that Travel Plans will be necessary to support planning applications in the Sustainable Urban Neighbourhood and Kirkley Waterfront.

It is agreed that air quality assessments will also be needed. These will need to take into account the results of the Transport Assessments.

An ecological assessment will need to form part of the Environmental Impact Assessment.

**Conclusion:** Amend Planning Application Requirements to refer to the need for Travel Plans, ecological assessments and air quality assessments. Also make reference to other Environmental Impact Assessment studies that will likely be required such as a townscape/landscape assessment.
Appendix A – List of People and Organisations Consulted.

Members of the public
331 households who live close to the Sustainable Urban Neighbourhood
2109 people who are on the Council’s Local Development Framework mailing list
Press release in Lowestoft Journal to inform other interested people.

Statutory Consultee Organisations

<table>
<thead>
<tr>
<th>Organisation</th>
<th>Consultee</th>
</tr>
</thead>
<tbody>
<tr>
<td>Anglian Water</td>
<td>Norfolk County Council</td>
</tr>
<tr>
<td>Associated British Ports</td>
<td>O2 (UK) Ltd</td>
</tr>
<tr>
<td>Royal Mail</td>
<td>Office of Government Commerce</td>
</tr>
<tr>
<td>British Telecom</td>
<td>Orange</td>
</tr>
<tr>
<td>British Telecommunications plc</td>
<td>Suffolk Coastal District Council</td>
</tr>
<tr>
<td>Broads Authority</td>
<td>Suffolk County Council</td>
</tr>
<tr>
<td>Broads Authority</td>
<td>South Norfolk District Council</td>
</tr>
<tr>
<td>Broads Authority</td>
<td>Suffolk Coastal District Council</td>
</tr>
<tr>
<td>Mobile Operators Association</td>
<td>Suffolk Coastal District Council</td>
</tr>
<tr>
<td>UK Power Networks</td>
<td>Suffolk Constabulary (Architectural Liaison Officer)</td>
</tr>
<tr>
<td>Department for Business, Innovation &amp; Skills</td>
<td>Suffolk Constabulary (Eastern Area Partnership Manager)</td>
</tr>
<tr>
<td>Department for Culture, Media and Sport</td>
<td>Suffolk County Council</td>
</tr>
<tr>
<td>Department for Education</td>
<td>Suffolk County Council</td>
</tr>
<tr>
<td>Department for Work and Pensions</td>
<td>Suffolk County Council</td>
</tr>
<tr>
<td>East of England Development Agency</td>
<td>Suffolk County Council</td>
</tr>
<tr>
<td>East of England Local Government Association</td>
<td>Suffolk County Council (Development Policy Manager)</td>
</tr>
<tr>
<td>East of England Public Health and Social Care Directorate</td>
<td>Suffolk County Council (Planning Obligations)</td>
</tr>
<tr>
<td>East of England Strategic Health Authority</td>
<td>Suffolk County Council</td>
</tr>
<tr>
<td>English Heritage</td>
<td>Suffolk County Council (Rail Policy &amp; Freight)</td>
</tr>
<tr>
<td>Environment Agency</td>
<td>Suffolk County Council</td>
</tr>
<tr>
<td>Essex &amp; Suffolk Water</td>
<td>Suffolk County Council</td>
</tr>
<tr>
<td>GO-East</td>
<td>Suffolk County Council</td>
</tr>
<tr>
<td>Great Yarmouth Borough Council</td>
<td>T-Mobile (UK) Limited</td>
</tr>
<tr>
<td>Highways Agency</td>
<td>The Home Office</td>
</tr>
<tr>
<td>Homes and Communities Agency</td>
<td>The National Federation of Gypsy Liaison Groups</td>
</tr>
<tr>
<td>Hutchison 3G</td>
<td>The Planning Inspectorate</td>
</tr>
<tr>
<td>James Paget Healthcare Trust</td>
<td>The Southwold &amp; Reydon Society</td>
</tr>
<tr>
<td>Waveney Disability Forum</td>
<td>UK Power Networks</td>
</tr>
<tr>
<td>Great Yarmouth Borough Council</td>
<td>Vodafone Group plc</td>
</tr>
<tr>
<td>Marine Management Organisation</td>
<td>Waveney Practice Based Commissioning</td>
</tr>
<tr>
<td>Mid Suffolk District Council</td>
<td>Department for Environment, Food and Rural Affairs</td>
</tr>
</tbody>
</table>
Local Organisations

Abellio Greater Anglia Ltd
Active Waveney Sports Partnership
Agency for the Legal Deposit Libraries
Ancient Monuments Society
Associated British Ports
Babergh District Council
Beccles & Bungay Journal
British Library
Bungay Chamber of Trade
Bungay Society
Church Commissioners
Churches Together
The Crown Estate
CTC Right to Ride Network (Waveney)
DIAL Lowestoft and Waveney
East Anglian Ambulance NHS Trust
Fields in Trust (FIT)
First Eastern Counties
Flagship Housing Group
Forest Heath District Council
Forestry Commission
Halesworth Playing Field Association
Health & Safety Executive
HM Prison Service

Ian Bradbury
Sport England
St Edmundsbury Borough Council
Suffolk ACRE
Suffolk Amphibian & Reptile Group
Suffolk Coast & Heaths Unit
Suffolk Fire & Rescue Service (Lowestoft)
Suffolk Fire & Rescue Service (Planning & Review)
Suffolk Preservation Society
Suffolk Wildlife Trust
Suffolk Wildlife Trust
Suffolk ACRE
Sustrans
The Beach Radio
The Beccles Society
The Broads Society
The Bungay Society
The Colville Gospel Trust
The Community Forum
The Gypsy Council
The Halesworth & Blyth Valley Partnership
The National Trust
The Theatres Trust
MP for Suffolk Coastal
Home Builders Federation
Kessingland Travellers Site
Internal Drainage Board
Ipswich Borough Council
Job Centre Plus Cambridgeshire & Suffolk
Kessingland Sports & Social Centre
Kirkley Business Association

Learning Skills Council for Suffolk
Legal Deposit Office
Lowestoft & Waveney Chamber of Commerce
Lowestoft Civic Society
Lowestoft College
Lowestoft Harbour Maritime Businesses Group

Lowestoft Journal
MP for Great Yarmouth
MP for Waveney
NHS Great Yarmouth and Waveney
NATS Safeguarding
Northern Area Education Office
Positive Changes 4 Young People
RSPB East of England
SAVO
Southwold and Reydon Society

Parish and Town Councils

Ashby, Herringfleet and Somerleyton Parish Council
Barnby Parish Council
Barsham & Shipmeadow Parish Council
Beccles Town Council
Benacre Parish Meeting
Blundeston & Flixton (East) Parish Council
Blyford & Sotherton Parish Council
Brampton with Stoven Parish Council
Bungay Town Council
Corton Parish Council
Covehithe Parish Meeting
Flixton, SE St Cross & St Margaret Parish Council
Frostenden, Uggeshall & South Cove Parish Council
Gisleham Parish Council
Halesworth Town Council
Henstead with Hulver Street Parish Council
Holton Parish Council
Homersfield Parish Council
Ilketshall St Andrew Parish Council
Ilketshall St John Parish Meeting
Ilketshall St Lawrence Parish Council
Ilketshall St Margaret Parish Meeting

The Woodland Trust
Waveney Cycling Campaign
Waveney Tourism Forum
Woodland Trust
1st East Waterfront regeneration Co
East of England Tourist Board
Jobcentre Plus (East Anglia)
Lowestoft International Support Group
Royal Mail Group
Suffolk Coast and Heaths AONB Unit
Suffolk Development Agency
Suffolk Preservation Society
Suffolk Preservation Society (CPRE)
1st East Waterfront Regeneration Co
Kessingland Parish Council
Lound Parish Council
Mettingham Parish Council
Mutford Parish Council
North Cove Parish Council
Oulton Parish Council
Redisham Parish Meeting
Reydon Parish Council
Ringsfield & Weston Parish Council
Rumburgh Parish Council
Rushmere Parish Meeting
Shadingfield, Sotterley, Willingham & Ellough Parish Council
Southwold Town Council
Spexhall Parish Council
St James South Elmham Parish Meeting
Three Saints Parish Council
Carlton Colville Town Council
Wangford with Henham Parish Council
Wissett Parish Council
Worlingham Parish Council
Wrentham Parish Council
### Appendix B – List of People and Organisations who responded to the consultation on the First Draft.

<table>
<thead>
<tr>
<th>Name</th>
<th>Organisation Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr Michael Leedham</td>
<td></td>
</tr>
<tr>
<td>Mr George Redpath</td>
<td></td>
</tr>
<tr>
<td>Graham Hunt</td>
<td></td>
</tr>
<tr>
<td>Mr Andrew Hughes</td>
<td></td>
</tr>
<tr>
<td>Mr Norman Castleton</td>
<td></td>
</tr>
<tr>
<td>Ralph Paul</td>
<td></td>
</tr>
<tr>
<td>Mr Gerald Wilson</td>
<td>Sharpley &amp; Regent Insurance Services Limited</td>
</tr>
<tr>
<td>Mr Leslie Eddowes</td>
<td></td>
</tr>
<tr>
<td>Mr Bob Prior</td>
<td></td>
</tr>
<tr>
<td>Mr Peter Webster</td>
<td></td>
</tr>
<tr>
<td>Mr Michael Wilks</td>
<td>Suffolk County Council</td>
</tr>
<tr>
<td>Miss Carrie Williams</td>
<td>Environment Agency</td>
</tr>
<tr>
<td>Mr Richard Chilvers</td>
<td>Waveney Trades Union Council</td>
</tr>
<tr>
<td>Mr &amp; Mrs C S Clarke</td>
<td></td>
</tr>
<tr>
<td>Mr &amp; Mrs R Sweetman</td>
<td></td>
</tr>
<tr>
<td>Miss R K Hutton</td>
<td></td>
</tr>
<tr>
<td>Mr John H Martin</td>
<td></td>
</tr>
<tr>
<td>Mrs Rita Carroll</td>
<td></td>
</tr>
<tr>
<td>Mr BA Crockford</td>
<td></td>
</tr>
<tr>
<td>Edward Gilder</td>
<td>Badger Building</td>
</tr>
<tr>
<td>LE Matthews</td>
<td></td>
</tr>
<tr>
<td>R Brown</td>
<td></td>
</tr>
<tr>
<td>Mr Ian Smith</td>
<td></td>
</tr>
<tr>
<td>Gary Chisman</td>
<td>Highways Agency</td>
</tr>
<tr>
<td>Mr Peter Eyres</td>
<td></td>
</tr>
<tr>
<td>Mr Charles William O'Neill</td>
<td></td>
</tr>
<tr>
<td>Mr R Lock</td>
<td></td>
</tr>
<tr>
<td>Roger Denny</td>
<td></td>
</tr>
<tr>
<td>David J Ferris</td>
<td></td>
</tr>
<tr>
<td>Mr Stephen Faulkner</td>
<td>Norfolk County Council</td>
</tr>
<tr>
<td>Mrs Sue Bull</td>
<td>Anglian Water</td>
</tr>
<tr>
<td>John Clements</td>
<td>Broads Authority</td>
</tr>
<tr>
<td>Jess Tipper</td>
<td>Suffolk County Council</td>
</tr>
<tr>
<td>Mr -</td>
<td>Natural England</td>
</tr>
<tr>
<td>Mr John Thompson</td>
<td>CTC Right To Ride Network (Waveney)</td>
</tr>
<tr>
<td>Mr G Humphries</td>
<td></td>
</tr>
<tr>
<td>Mr John W Parish</td>
<td></td>
</tr>
<tr>
<td>Mr Nigel Searby</td>
<td></td>
</tr>
<tr>
<td>Miss G &amp; Miss J Bailey</td>
<td></td>
</tr>
<tr>
<td>Ray And Patricia Oldman</td>
<td></td>
</tr>
<tr>
<td>Mrs Eileen Currell</td>
<td></td>
</tr>
<tr>
<td>B R Knights</td>
<td></td>
</tr>
<tr>
<td>Mrs N E Rich</td>
<td></td>
</tr>
<tr>
<td>Mrs L Sivell</td>
<td></td>
</tr>
<tr>
<td>Mr P H Cook</td>
<td></td>
</tr>
</tbody>
</table>
### Name | Organisation Name
--- | ---
Alan Moltino |  
Mark Oakes | M S Oakes Securities Limited  
Miss J E Fermer |  
Mr L Manners |  
R H Carr |  
Valerie Banham |  
Mrs J Wright |  
Mrs Rosemary Chapman |  
D & R Briggs |  
B J Hood And Mrs G Hood |  
John Bennett |  
Neville D Collen |  
Norman P J Cossey |  
Mr Alan Bagley | Lydia Eva & Mincarlo Charitable Trust  
Mr Anthony Swain |  
Mrs Eileen Pembroke |  
Mr John Wyson | The Excelsior Trust  
Mr John Wyson | Lowestoft Harbour Maritime Businesses Group  
C W Knights |  
Bob Lawrence |  
Mr R B Cook |  
Mr Trevor Francis |  
Joyce Jacob |  
Martin Jeffries |  
Keith Jordan |  
Mrs H Morris |  
Mrs Angela Whittaker |  
Mr & Mrs DJ Tebble |  
RD Redford |  
Ms Lawrence |  
John Grint |  
Mrs CJ Coward |  
Mr & Mrs J Tucker |  
Mr Brian E Holland |  
C Morgan |  
D A Humm |  
Mr David Morgan |  
G Barnes |  
J & B Sansom |  
J E Constable |  
J Perkins |  
Joan Durrant |  
Mr Barry Moore | Campaign For Better Transport - Ipswich And Suffolk Group  
Miss MD Witty |  
Mr James Bailey |  
Mrs J Burrows |  
Mr & Mrs JA Hunt |  
J Reed |  
Mr & Mrs S Reader |  
Mr Roderick Linsell |
<table>
<thead>
<tr>
<th>Name</th>
<th>Organisation Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr D Tapping</td>
<td></td>
</tr>
<tr>
<td>Mr J Spalding</td>
<td></td>
</tr>
<tr>
<td>Mrs Sally Stoakley</td>
<td></td>
</tr>
<tr>
<td>Mrs AE Axon</td>
<td></td>
</tr>
<tr>
<td>Mrs C Hunt</td>
<td></td>
</tr>
<tr>
<td>Mrs Ina Champion</td>
<td></td>
</tr>
<tr>
<td>Mr Norman A R Walker</td>
<td></td>
</tr>
<tr>
<td>Mrs F Benton</td>
<td></td>
</tr>
<tr>
<td>Mrs Rosalie Bruce</td>
<td></td>
</tr>
<tr>
<td>Mrs M Breach</td>
<td></td>
</tr>
<tr>
<td>Mrs J Hogg</td>
<td></td>
</tr>
<tr>
<td>Mrs Diana Beamish</td>
<td></td>
</tr>
<tr>
<td>Mr F R And Mrs S J Hambling</td>
<td></td>
</tr>
<tr>
<td>Mrs Jane Shelley</td>
<td></td>
</tr>
<tr>
<td>Mr John Hunt</td>
<td></td>
</tr>
<tr>
<td>Mr Derek Prentice</td>
<td></td>
</tr>
<tr>
<td>Peter A Warnes</td>
<td></td>
</tr>
<tr>
<td>V G Christie</td>
<td></td>
</tr>
<tr>
<td>Mr Neville Surtees</td>
<td>Barton Willmore (On Behalf Of Sanyo Industries (UK) Ltd)</td>
</tr>
<tr>
<td>Mr Jonathan Towns</td>
<td>Lowestoft Cruising Club</td>
</tr>
<tr>
<td>Mr John Dimbleby</td>
<td>DTZ</td>
</tr>
<tr>
<td>Mr James Meyer</td>
<td>Suffolk Wildlife Trust</td>
</tr>
<tr>
<td>Cllr Sonia Barker</td>
<td></td>
</tr>
<tr>
<td>Peter George</td>
<td>Lowestoft Cruising Club</td>
</tr>
<tr>
<td>Valerie Burton</td>
<td></td>
</tr>
<tr>
<td>Mr Dean Millican</td>
<td></td>
</tr>
<tr>
<td>Mr Jim Jordan</td>
<td></td>
</tr>
<tr>
<td>Mr Robert Riley</td>
<td>Unite The Union</td>
</tr>
<tr>
<td>Mr Stuart Self</td>
<td></td>
</tr>
<tr>
<td>Mr Richard Cole</td>
<td></td>
</tr>
<tr>
<td>Sarah Guymer</td>
<td></td>
</tr>
<tr>
<td>Atkins</td>
<td></td>
</tr>
<tr>
<td>Mr Richard Bennett</td>
<td></td>
</tr>
<tr>
<td>Mr Tony Tibbenham</td>
<td></td>
</tr>
<tr>
<td>Mr Joseph Horwood</td>
<td></td>
</tr>
<tr>
<td>David Evans</td>
<td></td>
</tr>
<tr>
<td>Mrs C Cartner</td>
<td></td>
</tr>
<tr>
<td>Mr John Cooper</td>
<td></td>
</tr>
<tr>
<td>John Wells</td>
<td></td>
</tr>
<tr>
<td>Mrs Judy Smith</td>
<td></td>
</tr>
<tr>
<td>Mr Eric Richardson</td>
<td></td>
</tr>
<tr>
<td>Jayne Boys</td>
<td></td>
</tr>
<tr>
<td>Roger Shaw</td>
<td>Lowestoft Cruising Club</td>
</tr>
<tr>
<td>Mr Rodney Clark</td>
<td>Lowestoft Cruising Club</td>
</tr>
<tr>
<td>Mr Richard Jordan</td>
<td></td>
</tr>
<tr>
<td>Mr David Hatton</td>
<td></td>
</tr>
<tr>
<td>Peter Reeve</td>
<td></td>
</tr>
<tr>
<td>Richard Card</td>
<td>Norfolk And Suffolk Boating Association</td>
</tr>
<tr>
<td>Mr Michael Kippin</td>
<td></td>
</tr>
<tr>
<td>Name</td>
<td>Organisation Name</td>
</tr>
<tr>
<td>---------------------------</td>
<td>-------------------------------------------------------</td>
</tr>
<tr>
<td>Mr Simon Fennell</td>
<td>S&amp;G Gas Services Ltd</td>
</tr>
<tr>
<td>Cross</td>
<td></td>
</tr>
<tr>
<td>Ms Sue Cunningham</td>
<td>British Horse Society</td>
</tr>
<tr>
<td>Stuart Mack</td>
<td>Lowestoft Cruising Club</td>
</tr>
<tr>
<td>Mary Pretswell</td>
<td></td>
</tr>
<tr>
<td>Mr &amp; Mrs Mallabar</td>
<td></td>
</tr>
<tr>
<td>T M O'Hara</td>
<td>Associated British Ports</td>
</tr>
<tr>
<td>Mark Jones</td>
<td>AKD Engineering Ltd</td>
</tr>
<tr>
<td>R Hynd</td>
<td></td>
</tr>
<tr>
<td>Mr W Grint</td>
<td>Capelli Professional Hair And Beauty Supplies</td>
</tr>
<tr>
<td>Adam Rio Jovovich</td>
<td></td>
</tr>
<tr>
<td>R &amp; S Burgoyne</td>
<td></td>
</tr>
<tr>
<td>Peter M Farrow</td>
<td></td>
</tr>
<tr>
<td>Stanley Road Resident</td>
<td></td>
</tr>
<tr>
<td>Jo And John Skinner</td>
<td></td>
</tr>
<tr>
<td>Mrs A Weeks</td>
<td></td>
</tr>
<tr>
<td>John &amp; Ann Leech</td>
<td></td>
</tr>
<tr>
<td>Tony Webb</td>
<td>Swanton Herons Girls Football Club</td>
</tr>
<tr>
<td>Tina Andrews</td>
<td></td>
</tr>
<tr>
<td>Richard Woods</td>
<td></td>
</tr>
<tr>
<td>Lynne Firmage</td>
<td></td>
</tr>
</tbody>
</table>