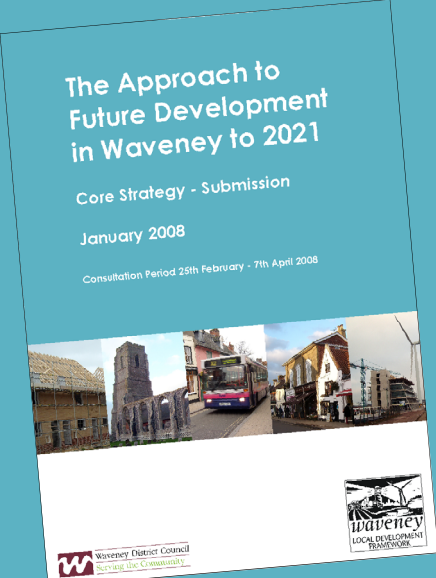


# The Sequential Approach to Flood Risk in Lowestoft

February 2008

To Accompany the Core Strategy Submission Document





# **The Sequential Approach to Flood Risk in Lowestoft**

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## **Contents**

	<b>Page Number</b>
1. Introduction	1
2. Context and background information	1
3. Addressing the Sequential and Exceptions tests in PPS25	9
4. Conclusion	15
Appendix 1 – Policy CS01 – Spatial Strategy	16

## 1. Introduction

The purpose of this document is to provide the evidence base that supports the approach to flood risk that has been taken by Waveney District Council in identifying the Lake Lothing and Outer Harbour Area of Lowestoft as a focus for development in the Core Strategy.

## 2. Context and background information

### PPS25 - Development and Flood Risk

2.1 PPS25 requires local authorities to take a sequential risk-based approach to determining the suitability of land for development at all levels of the planning process.

2.2 Paragraph 17 of PPS25 states that in areas at risk of flooding from rivers or the sea, preference should be given to locating new development in Flood Zone 1 (Low Probability). If there is no reasonably available site in Flood Zone 1, the flood vulnerability of the proposed development can be taken into account in locating development in Flood Zone 2 (medium probability) and then Flood Zone 3 (3a high probability and 3b functional floodplain). Within each Flood Zone new development should be directed to sites at the lowest probability of flooding from all sources as indicated by the Strategic Flood Risk Assessment.

2.3 In accordance with PPS25, most developments are considered inappropriate in the functional floodplain, with the exception of those uses classified as water compatible and essential infrastructure in Table D.2 of PPS25. The siting of such developments in the functional floodplain is only permissible where they can be designed and constructed to:

- Remain operational and safe for users in times of flood;
- Result in no net loss of floodplain storage;
- Not impede water flows; and
- Not increase flood risk elsewhere.

2.4 There are two policy aims in this zone. *'Developers and local authorities should seek opportunities to:*

- (i) reduce the overall level of flood risk in the area through the layout and form of the development and the appropriate application of sustainable drainage techniques; and*
- (ii) relocate existing development to land with a lower probability of flooding.'*

2.5 Paragraph 19 of PPS25 recognises the fact that wider sustainable development criteria may require the development of some land that cannot be delivered through the sequential test. In these circumstances, the exception test can be applied to some developments depending on their vulnerability classification (Table D.2 of PPS25) in order to avoid social and economic blight.

2.6 In order for the Exception Test to be passed the following criteria must be met (Paragraph D9, Annex D, PPS25):

- a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a SFRA where one has been prepared...;*

*b) the development should be on developable previously-developed land or, if it is not on previously developed land, that there are no reasonable alternative sites on developable previously-developed land; and*

*c) a FRA must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.*

- 2.7 The exceptions test cannot be applied in the functional flood plain (Table D.3 PPS25). Neither can it be applied for 'highly vulnerable' uses, such as police and ambulance stations, in areas at greater risk than Flood Zone 2. 'More vulnerable' uses include hospitals, schools and houses and the exception test can apply when these are in Flood Zone 3a. 'Less vulnerable' uses include shops, offices and industrial development and can be acceptable in Flood Zone 3a subject to the sequential approach.
- 2.8 Therefore, in terms of the type of development proposed in the Area Action Plan it is important that the level of flood risk in the area is reduced to at least Flood Zone 3a in order that the 'less vulnerable' uses can be acceptable subject to the sequential approach, and the exceptions test can be applied for the 'More Vulnerable' uses.

### **PPS3 Housing**

- 2.9 In support of its objective of creating mixed and sustainable communities, the Government's policy set out in PPS3 is to ensure that housing is developed in locations that offer a range of community facilities and with good access to jobs, key services and infrastructure. Effective use should be made of land.
- 2.10 The priority for development should be the re-use of previously developed land, in particular vacant and derelict sites and buildings. The national target is that at least 60% of new housing should be provided on previously developed land annually. PPS3 requires that Local Development Frameworks contain local previously developed land targets and trajectories, having regard to national and regional targets. Local authorities should consider a range of incentives or interventions to ensure that previously developed land is developed in line with the trajectory, including planning to address obstacles to the development of vacant and derelict sites.
- 2.11 Factors to be considered when identifying broad locations for new housing include:
- Contributions to cutting carbon emissions from focusing new development in locations with good accessibility by public transport and/or by means other than the private car;
  - Any physical, environmental and other constraints, including flood risk;
  - Accessibility of proposed development to existing local community facilities, infrastructure and services, including public transport;
  - The need to develop sustainable mixed communities across the wider local authority area as well as at neighbourhood level.

### **Waveney Strategic Housing Land Availability Assessment (November 2007)**

- 2.12 The Waveney Strategic Housing Land Availability Assessment (SHLAA) contained an update of the 2002 Urban Capacity Study. The report concluded that the realistic number of dwellings that could be delivered in Waveney on urban capacity sites (excluding the URC area) was 1,684.
- 2.13 Across the District only 208 of these dwellings were considered deliverable on previously developed vacant and derelict land, while a greater number (330) were achievable through

intensification. 72% of the sites were considered likely to yield less than 3 units. Many of the previously developed sites identified are small intensification sites, subdivision of existing housing or flats above shops that are not suitable for allocation and are more likely to come forward as windfalls.

- 2.14 In Lowestoft, the total realistic number of dwellings that could be delivered on urban capacity sites outside the URC area was 1,039. The Waveney Core Strategy needs to make provision for 2,374 new homes to be delivered in the District between 2007 and 2025, in order to meet the requirements of the East of England Plan (RSS14) and PPS3. As the main town, most of these should be built in Lowestoft.
- 2.15 This means that if the URC area was not developed, greenfield allocations would be necessary in and around Lowestoft in order to plan for sufficient housing. The SHLAA has shown that sufficient alternative large sites do not exist elsewhere in Waveney to meet this provision on previously developed land.

#### **Waveney Employment Land Study (January 2006)**

- 2.16 Key conclusions from the study include:

- While Waveney appears to have more employment land than it needs, it is not in the right places. There are shortages of land in popular locations, especially sites with good road access on the outskirts of town (e.g. South Lowestoft Industrial Estate).
- Waterfront industrial and port areas contain a high proportion of vacant buildings and land. Access in these areas (such as Lake Lothing) is poor, over congested bridges and/or densely developed residential areas, which makes them unsuitable for general industrial development. The areas are not currently popular with occupiers or prospective investors.
- Industrial development conflicts with the local residential community on the south shore of Lake Lothing.
- In the older port-riverside areas there is considerable surplus land. Lake Lothing in Lowestoft has an excess of up to 35 ha land, which should eventually be released.
- Survey results suggested that many users who have waterfront access do not need it. These sites can be developed for mixed use – principally housing, offices, marina and allied uses, with port areas rationalised.
- Areas should be reserved for core port uses, fabrication of wind turbines and existing businesses that really need water frontage.
- Offices and housing with high densities are better located close to the town centre, with low density, land hungry manufacturing and storage uses on the outskirts.
- Mixed use development could result in higher employment levels, on less land.

#### **Waveney and Great Yarmouth Retail and Leisure Study (August 2006)**

- 2.17 Key conclusions from the study in relation to Lowestoft include:

- Lowestoft town centre is the principal shopping and commercial centre within Waveney.
- While there is limited capacity for new convenience goods retailing in Waveney up to 2016, there is more substantial capacity for new comparison goods retailing. Major new floorspace capacity should be concentrated in the principal retail centres (i.e. Lowestoft). These centres have the critical mass of retailing and catchments to sustain significant new additions to their retail stock, which will help to reinforce their relative status as the principal shopping locations.



- Residual expenditure should be allocated in town centre / edge of centre locations in the first instance – only if there are no suitable and viable sequential sites available should consideration be given to out of centre locations.
- Investment and expansion of provision of other centres in the area is likely to continue to increase (e.g. Norwich, Great Yarmouth). If other centres continue to improve their offer, so must Lowestoft if it is to retain and/or enhance its current position in the retail hierarchy. Standing still is akin to decline.
- The lack of private sector investment in Lowestoft in the recent past and in the development pipeline is a cause for concern. Lowestoft needs to raise its status and encourage market interest, using marketing and promotion initiatives. The key aim is to yield opportunities for redevelopment and reconfiguration within the centre to create units suited to modern retailer requirements.
- A shift change in the market perception of the town centre needs to be explored to attract new commercial and residential investors. This could be achieved through provision of a structured development opportunities approach that will allow for the procurement of significant mixed-use regeneration schemes to be used as a catalyst for further development within the town centre. It is essential that the product offered is diversified to broaden the market appeal of the town and broaden its socio-economic base.
- There is potential to improve and increase the quantity and quality of Lowestoft's retail and leisure offer. Lowestoft does not have a strong (quality) restaurant or evening offer. There would appear to be potential to strengthen the eating and drinking offer as part of the URC regeneration initiative, which would also cater for any potential increase in tourists and visitors.
- The study notes that inclusion of residential accommodation in town centre retail and leisure schemes assists general economic viability and sustainability, and provides a more balanced mix of uses that would introduce residents to the town centre, assist with long-term regeneration proposals and assist in addressing local housing needs.

### **Waveney Strategic Flood Risk Assessment (January 2008)**

- 2.18 The Strategic Flood Risk Assessment has provided an evidence base to inform the development of Core Strategy policies. Modelling for 2007 shows that the majority of the Lake Lothing and Outer Harbour area is within flood zone 3a, with small areas classified as flood zone 3b (functional floodplain – defined as land that would flood in a 1 in 20 year event). Taking into account climate change, the majority of the Lake Lothing area will be in flood zone 3b in 2107 if defence and/or land heights are not increased. (see map).
- 2.19 The Strategic Flood Risk Assessment has:
- Identified that allocations could reasonably be made outside flood zones 2 and 3 in all of the potential development areas except the Lake Lothing area of central Lowestoft – as a result Core Strategy policy CS03 (Flooding and Coastal Erosion) has been made more restrictive in other parts of the District, to specify that residential allocations will not be made in flood zones 2 and 3 elsewhere.
  - Identified that it will be difficult to locate new allocations outside flood zones 2 and 3 in the Lake Lothing area of central Lowestoft – as a result this is specified as an exception in the policy due to the wider sustainability benefits of developing this large brownfield area.
  - Demonstrated how actual flood risk to existing properties will increase in Lowestoft over the next 100 years, with the impact of climate change, if nothing is done to improve flood defences. Existing residential, employment and retail uses, as well as major transport routes, will be affected by more frequent flooding as sea level rises, with implications for the quality of life and economy of the area. Regeneration of existing town centre and existing residential and employment areas will be blighted by

the increased flood risk associated with climate change. The SFRA states that development of the Lake Lothing area may be limited unless strategic defence improvements are carried out. In the absence of EA funding, developing the area provides an opportunity to improve flood defences in Lowestoft for the benefit of existing properties as well as enabling new development to take place.

- Shown where the areas of greatest and least hazard will be in the event of flooding in the area in 2107, taking into account climate change. This includes actual risk if defences remain as they are now and are overtopped by floodwaters, and residual risk should they be improved yet breached. This can be taken into account when allocating sites for different uses in the Area Action Plan, and helps ensure that safe access and egress can be achieved.
- Produced animations that demonstrate which areas will be inundated first, how quickly other areas will flood, and what depths will be reached. Again, this can be taken into account when allocating sites for different uses in the Area Action Plan, and helps ensure that safe access and egress can be achieved.

### **Background to the designation of the URC**

- 2.20 The background and evolving policy context clearly demonstrates the regional and national commitment to support the regeneration of Lowestoft and in particular the heart of the town in and around Lake Lothing.

### **Regional Planning Guidance for East Anglia (RPG6), November 2000 (Now RSS)**

- 2.21 One of the three strategic aims of the Regional Planning Guidance is 'to reduce imbalances and promote the appropriate development of the economy and thus improve the social well being, prosperity and quality of life for the people in East Anglia.'
- 2.22 Objectives include: -
- maximising energy efficiency and minimising harmful emissions and waste
  - reducing disparities in social and economic opportunities and quality of life by investing in areas of disadvantage and encouraging employment opportunities in the region
  - maintaining and enhancing the region's economy and competitiveness, to increase employment, and to promote a closer relationship between homes and jobs
  - to make the most beneficial use of built-up areas, particularly derelict or previously developed land.
- 2.23 The Guidance identifies Lowestoft and Great Yarmouth as Priority Areas for regeneration. The attractive historic town centres, regeneration potential of docklands, vitality of the seaside resorts but weak economies, high unemployment and concentrations of deprivation in both Great Yarmouth and Lowestoft are acknowledged. Policy 20 states that a vision for Lowestoft and Great Yarmouth should continue to be developed and implemented by the District and County authorities concerned. The vision should:
- be based on an understanding of the linkages between and mutual roles of the two towns and surrounding communities;
  - strengthen their economic base and make the area more attractive to inward investment;
  - protect and enhance the attractive historic and natural environments; and
  - achieve the redevelopment for appropriate alternative uses of underused industrial sites.
- 2.24 In response to RPG6 policy 20 the local authorities, EEDA, Go-East and EERA contributed towards commissioning SQW to prepare a sub-regional development

framework (April 2003). The Study recommended that the area should continue to be identified as a Priority Area for Economic Regeneration. The existing industrial sectors, especially tourism, food processing and port related industries should continue to be supported. It was considered however, that reliance on these sectors would be insufficient to generate further employment growth. The Study therefore recommended developing new industrial sectors including the knowledge economy and environmental industries. The Study also encouraged an urban renaissance of the two towns as well as the need to promote transport improvements on the key links into and within the area.

- 2.25 The study proposed the following *Vision Statement* for the Great Yarmouth and Lowestoft sub-region:

*“Build on the unique qualities of the sub-region and its links with Europe through an urban renaissance and other initiatives to harness established strengths, realise leading edge opportunities, encourage the environmental economy and promote comprehensive regeneration”*

- 2.26 Further work by the local authorities developed the Study findings into the sub regional policies in the draft East of England Plan (December 2004).

**East of England Plan Draft Revision to the Regional Spatial Strategy (RSS) for the East of England, December 2004**

- 2.27 The draft Regional Spatial Strategy builds on the RPG policies and continues to identify Great Yarmouth and Waveney as Priority Areas for regeneration.

- 2.28 Specific policies relate to the Great Yarmouth and Lowestoft sub-region. In particular, policy GYL1: Economy and Regeneration states that:

‘Local development documents and other strategies will:

- develop the existing economic structure by supporting established sectors including food processing, energy, port, transport, and tourism industries
- promote radical change in the economy by building on the area's attributes:
  - the renewable energy cluster (utilizing existing offshore engineering skills)
  - a more diverse tourism cluster (extending the market by exploiting proximity to the Broads and wildlife areas as well as the seashore)
  - environmental technologies and the wider environmental economy. This will be furthered by seeking to establish a research and teaching centre supported by further and higher educational institutions and others to underpin the environmental economy
- encourage an urban renaissance in core areas by identifying priority areas and projects for brownfield redevelopment in order to achieve economic, physical and social regeneration in inner urban areas and, in particular, taking advantage of key waterfront sites in both towns. Priority will be given to those regeneration projects that can assist in dealing with concentrations of deprivation within the towns.

- 2.29 The following strategic locations are identified as being of particular importance in achieving the proposals listed above and will require appropriate policies in local development documents:

- Business parks and employment sites in south Gorleston and Ness Point area of Lowestoft to provide a focus for innovation in the energy sector

- South Denes/EastPort area of Great Yarmouth, for urban regeneration and port related activities
- Lake Lothing area of Lowestoft, for maritime and leisure industries, offshore wind energy and electronics.’

- 2.30 The draft East of England Plan (Dec 2004) also set out the need to establish an appropriate form of local delivery vehicle to implement the sub regional strategy based on a partnership with the local authorities, regional agencies and local bodies. This resulted in a successful bid for the creation of 1st East, Waterfront Regeneration Company for the Lake Lothing and harbour areas of central Lowestoft and parts of Great Yarmouth.
- 2.31 Policy E2 sets down job growth targets and identifies the need for 4700 jobs in the Lowestoft part of the sub region over the period 2001 to 2021.

**East of England Plan Proposed Changes to the Regional Spatial Strategy (RSS) for the East of England, December 2006 and subsequently Further Proposed Changes November 2007**

- 2.32 The further proposed changes propose an Overall Spatial Vision:  
‘By 2021 the East of England will be realising its economic potential and providing a high quality of life for its people, including by meeting their housing needs in sustainable and inclusive communities. At the same time it will reduce its impact on climate change and the environment, including through savings in energy and water use and by strengthening its stock of environmental assets.’
- 2.33 Policy SS2 deals with the Overall Spatial Strategy and continues to direct most growth to the major urban areas, with greatest potential to build on existing concentrations of activities and physical and social infrastructure. A 60% target is set for development on previously developed land, primarily for housing and employment uses.
- 2.34 The focus for growth is on the 21 key centres for development and change (Policy SS3), including 11 within the 4 growth areas of Cambridge sub-region, Essex Thames Gateway, Haven Gateway and the London Arc. Lowestoft is included as a key centre for development and change. Waveney continues to be identified (Policy SS5) as a priority area for regeneration due to its weak economic performance.
- 2.35 Policy E1 clarifies the indicative target for net growth in jobs for the period 2001–2021 as 5,000 for Waveney District.
- 2.36 Policy E3 identifies Great Yarmouth and Lowestoft as regionally strategic employment locations where strategic employment sites should be identified to support development associated with port expansion, regeneration and economic diversification.
- 2.37 Policy GYL1 identifies Lowestoft and Great Yarmouth as key centres for development and change. The policy defines a strategic approach for the two towns to promote their comprehensive regeneration, capitalising on their strengths and protecting and enhancing their environmental assets. Key elements to implement this strategy include:
- Promoting radical change in the economy by building on established sectors and diversifying into renewable energy, environmental technologies and wider environmental economy, a more diverse approach to tourism and port and related activities to develop links with the rest of Europe;
  - Urban renaissance is encouraged by focusing on inner urban and waterfront brownfield sites;

- Delivering additional housing, including affordable housing; and
- Promoting transport improvements on key transport corridors into the areas and between the towns, together with measures to relieve congestion and improve access to regeneration opportunities.

2.38 The Lowestoft and Great Yarmouth Urban Regeneration Company (URC) was approved by the ODPM in March 2005. As a key delivery vehicle its principle aim is to address and reverse deprivation within the two towns, primarily through the creation of jobs and the promotion of economic growth. One of the conditions of its establishment was the requirement for a masterplan for its area of operation.

2.39 The URC involves four different local authorities:

- Norfolk County Council
- Suffolk County Council
- Great Yarmouth Borough Council
- Waveney District Council

2.40 In addition, the URC is supported by the East of England Development Agency (EEDA), English Partnerships and a Board consisting of representatives from private practice and community groups. The URC took the name 1st East in January 2006.

2.41 The masterplan is now being prepared as an Area Action Plan for the respective geographical areas of each town.

#### **Progress on the Area Action Plan**

2.42 The Lake Lothing and Outer Harbour Area Action Plan is being prepared by Halcrow, on behalf of 1st East Urban Regeneration Company and Waveney District Council.

2.43 Part of the 'issues and options' stage of preparing the Area Action Plans, a seven week consultation with the public was launched in March 2006. This presented a range of options for regenerating Great Yarmouth and Lowestoft and asked for views on what is important to residents and businesses.

2.44 Exhibitions took place in both towns in March 2006, and a total of 5,200 responses were received to the ideas on display. A total of 962 responses were received following publication of the 'issues and option' document for formal public consultation during March and April 2006.

2.45 Following analysis of the consultation responses, the ideas were then refined into two Area Action Plan Preferred Options documents - one for each town. A draft Sustainability Appraisal Scoping Report was also prepared for consultation setting out the framework against which policies and proposals would be appraised. The Lake Lothing Area Action Plan Preferred Options was published for public consultation from 5 January to 19 February 2007 together with the Draft Sustainability Appraisal.

2.46 As part of the consultation, some 31,000 summary regeneration leaflets were distributed in local newspapers and 2700 mailed to individuals and groups that are on the two councils' consultation lists. In addition, full copies of the Area Action Plans were available to view on the 1st East and Council websites and at 26 distribution points used by the two councils including the town hall, libraries, some surgeries and community liaison points. 200 consultees (such as government agencies) received a pack containing a CD of the plans and background reports. During the six week consultation period, two community forum events were held and four presentations were made specifically to business organisations,

including one hosted by the Waveney and Norfolk Chambers' of Commerce. Over 1100 responses were received in total to the 'preferred options' consultation, including 844 for Lowestoft, 224 for Great Yarmouth and 44 addressing both towns.

- 2.47 Work is currently on-going to develop the Area Action Plans for submission to the Secretary of State, considering the consultation responses and enhanced evidence base. Submission of the Lake Lothing and Outer Harbour Area Action Plan will take place following submission of the Core Strategy, with the exact timetable still to be confirmed.

### **Environment Agency approach to development in the Lake Lothing Area of Lowestoft**

- 2.48 Lowestoft is uniquely located around the undefended, self-contained tidal inlet of Lake Lothing. Predicted climate change and associated sea level rise by 2107 mean that much of the Lake Lothing area is classified as functional floodplain (flood zone 3b) because of the predicted increased frequency of flooding. The type of development that can take place within flood zone 3b is highly restricted by PPS25. Lake Lothing currently has no flood defences and the Environment Agency does not plan to introduce new defences to protect the area.
- 2.49 Recognising the need for regeneration in Lowestoft and the URC area in particular, the Environment Agency has developed a unique approach to development in this area, in discussion with Waveney District Council and 1st East. The Agency has indicated that land raising would be acceptable in these waterfront areas, subject to satisfactory individual Flood Risk Assessments and cumulative assessment of development proposals demonstrating that raising the land out of flood zone 3b will not adversely affect surrounding land and properties. The land raising activity should be subject to a separate planning application, and approved in principle before the application for the proposed development is submitted. This unique 2-stage approach enables development land that would otherwise be blighted to be elevated out of the functional floodplain, so that development but may potentially take place in accordance with PPS25 (Environment Agency Anglian Region Area Manager's Report, 17<sup>th</sup> October 2007). This approach has been endorsed by 1st East as a satisfactory method for assisting the delivery of sites within the Lake Lothing area.

## **3. Addressing the Sequential and Exceptions Tests in PPS25**

### **The Sequential Test**

- 3.1 Sequential Test aims to ensure that development does not take place in areas at high risk of flooding when appropriate areas of lower risk are reasonably available. Alternative lower risk sites need to be appropriate for the type of development proposed and consistent with wider sustainability objectives.
- 3.2 Core Strategy proposes the central Lake Lothing and Outer Harbour area of Lowestoft for a mix of uses, including employment, retail, leisure, community facilities and residential development. Although the different uses could potentially be provided separately on smaller, dispersed sites, this would not achieve the benefits of creating a sustainable community with an integrated mix of uses.
- 3.3 Lake Lothing is a large brownfield site and if this were not developed, greenfield allocations would need to be made on the edge of Lowestoft or other towns - sufficient opportunities do not exist to accommodate growth on brownfield sites elsewhere on this scale (Waveney Strategic Housing Land Availability Assessment, November 2007).

3.4 As the main town in Waveney (and 2<sup>nd</sup> largest town in Suffolk), most growth should take place in Lowestoft. The SFRA indicated that there are large greenfield sites around the edge of Lowestoft in flood zone 1 (e.g. around of Oulton and Carlton Colville), with lower risk of flooding than Lake Lothing. However, these sites are not considered appropriate for the type of development proposed in Lake Lothing, for the following reasons:

3.5 Town centre uses:

- Town centre uses including new retail, office and leisure development should be located in, or on the edge of, town centres, in accordance with PPS6. Increasing the vitality and viability of Lowestoft town centre would attract new development and benefit the whole town. The Waveney and Great Yarmouth Retail Study (2006) showed that investment in Lowestoft town centre was necessary in order to maintain (and improve) its position in the regional retail hierarchy. Therefore the local economy would benefit from potentially reducing the amount of trade lost to other nearby centres (e.g. Great Yarmouth / Norwich). Integrating residential development in mixed use, central developments would have synergistic benefits, improving vitality and viability of the town centre by increasing footfall and potential customers to retail and leisure uses throughout the day and evening, and increasing access to services and facilities for residents. Out of centre sites are not considered appropriate for retail, leisure and office development.

3.6 Employment uses:

- Lowestoft has been identified as a Strategic Employment Location in policy E3 of the East of England Plan - further proposed changes (October 2007). Policy CS07 (Employment) seeks to implement this designation by identifying the Lake Lothing area as a strategic employment site.
- There are synergistic benefits to creating clusters of employment development, to encourage and support new industries. Lake Lothing offers the opportunity to create renewable energy and knowledge economy clusters by expanding on existing employment uses in the area. Access to the port is a particular benefit for these industries (e.g. maritime research and engineering). There are no alternative sites available that would offer these benefits.

3.7 Residential uses:

- Oulton already has permission for 800 homes and associated development (Woods Meadow) to be phased over a number of years. It is considered that further large-scale development in this timescale could put pressure on transport, services and other infrastructure in Oulton.
- Carlton Colville has seen substantial growth in recent years, and its population is still expanding as permissions are built out. Local opinion does not support further large-scale development in this timescale. It is considered that transport, services and other infrastructure in the parish needs time to adjust to the recent growth, in order for a sustainable community to develop. There are other environmental constraints, for example historic character and substantial archaeology, that make certain sites of low flood risk unsuitable for development in Carlton Colville.
- Strategic Gaps are defined in the Waveney Local Plan (Adopted November 1996) and the Waveney Interim Local Plan (May 2004) between Lowestoft and Kessingland and Corton. Development in these areas would lead to urban sprawl and loss of character in the villages. Undefended coastal areas outside existing settlement limits are likely to be at risk of coastal erosion now or in the future, making them unsuitable for residential development. In addition, many coastal areas have high biodiversity and/or geodiversity value (e.g. Pakefield to Easton Bavents, Corton Cliffs).
- Large parts of the countryside around Lowestoft consist of best and most versatile agricultural land (Grades 1, 2 and 3a), including areas of Grade 1 agricultural land

around Blundeston and Gisleham/Carlton Colville. In accordance with PPS7, this should be taken into account and poorer grade land used in preference, unless to do so would be inconsistent with other sustainability considerations.

3.8 General sustainability considerations:

- Developing a thriving community in place of vacant and under-used land in the heart of Lowestoft would benefit the whole town and improve perception of the area. It would contribute to the wider regeneration of Waveney and the Great Yarmouth and Lowestoft subregional area, in accordance with the East of England Plan (RSS14). Greenfield development will not address this issue, and dispersed development would not have the same cumulative benefits offered by comprehensive redevelopment of Lake Lothing.
- The wards surrounding Lake Lothing contain some of the most deprived areas of Suffolk (Index of Multiple Deprivation 2004). Development in these wards will help regenerate these areas, improving access to services, community facilities and a greater range of employment and accommodation options for new and existing residents, including those in most need. Well-designed development will improve the environment and perception of the area. Improved flood defences will reduce the vulnerability of existing residents to climate change. Again, development on alternative greenfield sites will not address these issues. Indeed, with increasing flood risk and blight, the deprivation and inequalities in this area of Lowestoft could worsen in future without development.
- Lake Lothing gives the opportunity to provide vibrant, mixed use development giving close access to jobs, services and facilities within walking distance of the new homes. This minimises reliance on the car for travel, and maximises opportunities for walking and sustainable transport (capitalising on this central location's proximity to a public transport interchange). In comparison, out of town, greenfield alternatives would result in reduced access to services, shops and facilities, and greater reliance on car travel to meet residents' day-to-day needs.
- If the Lake Lothing area is not redeveloped, large areas in the heart of Lowestoft, including existing town centre and employment uses important to the local economy, will be blighted. Unless measures are taken to address the predicted increase in flood risk as a result of climate change, the area at risk from flooding and blight will expand.

3.9 Developing sites of lower flood risk in preference to Lake Lothing would not address the regeneration needs of this area in the heart of Lowestoft, with its areas of vacant land and deprivation. Additional information outlined in support of the Exceptions Test (see below) shows that having regard to wider sustainability objectives, developing alternative greenfield sites of lower flood risk would not deliver the same benefits as developing Lake Lothing.

### **The Exception Test**

#### **a) Wider sustainability benefits of development in the Lake Lothing Area**

3.10 Development within the URC area of Lake Lothing and the Outer Harbour will meet a range of wider sustainability objectives, as outlined below:

#### Flood risk in Lowestoft

3.11 There are considerable wider sustainability benefits that can accrue through the comprehensive approach to development in this area. The policy aims as cited in PPS25 (Table D.1) can be achieved by seeking to reduce the overall level of flood risk in the area, through design and form of development but also through addressing the need for flood protection measures that will reduce the risk of flooding across a wider area of Lowestoft.



Large scale development could also contribute to a more coordinated approach to mitigating the impact of flood risk.

#### Access to Jobs and Services

- 3.12 Development within the URC area will provide development that is easily accessible and well-connected to
- public transport
  - the town centre
  - community facilities and services
  - jobs and employment opportunities
  - available infrastructure capacity, or locations where this can most readily be provided

#### Make Efficient and Effective Use of Land

- 3.13 Development within the URC area will provide development that will
- accord with the priority for development on previously developed land, including vacant and derelict sites and buildings
  - contribute to national and regional targets for re-use of previously developed land
  - provide for higher housing densities
  - make effective use of existing land and infrastructure
  - create mixed use developments

#### Encourage High Quality Design

- 3.14 Provide locations and a form of development that will
- create development in an attractive waterside setting
  - encourage higher density, mixed use development
  - promote viable and vibrant town centres
  - encourage intensification of the existing urban fabric
  - reinforce the distinctive maritime identity of the District
  - improve public access to the waterfront
  - improve linkages across the town and between the town centre and the waterfront
  - regenerate the heart of the town, which will support a sense of local pride and civic identity

#### Promote Sustainable and Inclusive Communities

- 3.15 Development within the URC area will provide development which
- will be of a sufficient scale and variety of locations which will provide a wide mix of housing type, tenure and price
  - addresses existing social needs and current high levels of deprivation
  - creates development of a sufficient size and mix to sustain community facilities, infrastructure and services
  - assists people to live near their work
  - has been based on positive engagement with key stakeholders and which meets community aspirations
  - will have synergistic benefits on town centre vitality and viability

#### Promote Sustainable Economic Development

- 3.16 Provide employment land in locations that will
- facilitate expansion of existing businesses
  - encourage clusters of similar activities, building on and supporting existing development
  - build on and reinforce current strengths in marine sciences, the food industry and the energy and renewables sectors

- promote growth in sectors which support current regional and sub-regional economic strategies

#### Reduce Carbon Emissions

3.17 Development within the URC area will provide

- a critical mass and scale of development which is better able to achieve effective carbon reduction from decentralised energy supply systems based on renewable and low-carbon forms of energy supply
- development in locations with good public transport accessibility and/or by means other than the private car

#### Sustainability Appraisal Criteria

3.18 The Sustainability Appraisal of the Waveney Core Strategy illustrated many of the sustainability benefits that are likely to result from policies to develop and regenerate the Lake Lothing area. A number of policies relate to development in this area, but of particular relevance are policies *CS05 – Lake Lothing and Outer Harbour Area Action Plan*, *CS03 – Flooding and Coastal Erosion* and *CS01 – Spatial Strategy*. Tables summarising the Sustainability Appraisal of these Core Strategy policies, together with appraisals of ‘do nothing’ scenarios for comparison, are included as an Appendix to this paper.

#### *CS05 – Lake Lothing and Outer Harbour Area Action Plan*

3.19 This policy performed better than the Do Nothing situation in social, environmental and economic areas, bringing a wide range of benefits. Lake Lothing is a large, underused brownfield site in a disadvantaged area of Lowestoft, where traditional industries have declined. Regeneration of this area could have significant positive effects in maximising use of previously developed land, creating jobs, homes, services and new retail floorspace in a well-designed mixed-use development, and improving the perception of Lowestoft. Large-scale development here minimises the need for greenfield development. Providing improved flood protection will have benefits for the wider area currently at risk from tidal flooding.

3.20 The main significant negative effect identified was that the area is currently at high risk of tidal flooding. Potential for flood risk, particularly from tidal flooding, needs to be mitigated – residual risk (e.g. from breach) will remain even with improved defences. To help mitigate this risk, developments should be designed to incorporate flood risk mitigation measures, and Environment Agency advice should be taken on how to minimise risk (e.g. through land-raising and design). It was also considered possible that revitalising this edge-of-centre area could draw visitors and investment out of the town centre as currently defined, particularly to the north, although the overall impact on the town centre will be positive. Ensuring good links to and from the town centre, including good accessibility by public transport, walking and cycling, will help to maintain vitality of both areas.

#### *CS03 – Flooding and Coastal Erosion*

3.21 Policy CS03 compared positively with the Do Nothing option in terms of improving health, achieving sustainable economic growth, and various environmental criteria. Significant positive effects include reducing the risk of new development being affected by flooding or coastal erosion. Increased use of sustainable drainage systems will further reduce risk of flooding and increase water supply to natural systems (groundwater and natural habitats). There is also likely to be an indirect positive impact on biodiversity and water pollution by preventing development near water based habitats like rivers, the coast, broads and

marshes. The residual risk associated with development in the high flood risk area of Lake Lothing is recognised. However, the fact that the policy allows for the regeneration of this area has positive impacts on the use of previously developed land, economic performance in disadvantaged areas, increased vitality of town centres, and increased accessibility to work by sustainable modes

#### *CS01 – Spatial Strategy*

- 3.22 This policy compared positively with the Do Nothing option against social, environmental and economic criteria. Likely significant positive effects of policy CS01 included preventing the loss of greenfield land to development outside existing settlement boundaries (in most cases), maximising the use and regeneration of previously developed land (including in town centres); meeting affordable housing needs throughout the District; encouraging rural diversification; giving protection to green infrastructure and local distinctiveness; minimising distance to services and the need to travel; and providing opportunities for travel by other means than the car. The spatial strategy emphasises employment and jobs growth, including in key sectors, and makes explicit the regeneration focus. This has positive impacts in the areas of employment, economic growth, investment and deprivation. It makes provision for jobs growth and accessible employment development, including in key sectors, in line with housing growth.
- 3.23 Although it was considered possible that concentrating development in existing town limits could put pressure on existing services and infrastructure, *policy CS04 – Infrastructure* ensures that services and facilities will be provided in line with development to avoid overburdening existing services in towns. It was also considered that the spatial strategy in isolation could potentially put development pressure on urban areas at risk from flooding or with archaeological value, or rural sites of high biodiversity, landscape, and agricultural value. This risk should be mitigated through consideration of the location and design of development and use of planning conditions, and policies *CS16 – Natural Environment* and *CS17 – Built and Historic Environment* will prevent inappropriate development from taking place.

#### **b) Provision of developable previously developed land in the Lake Lothing Area of Lowestoft**

- 3.24 The Lake Lothing and Outer Harbour area of Lowestoft contains a large proportion of the previously developed land within Waveney. The Waveney Employment Land Study estimated that up to 35 ha of surplus employment land could be released for other uses in this area, some of which could come forward quickly. Many sites are currently vacant, as the previous employment uses have already ceased.
- 3.25 All housing, commercial and other development proposed in this area in the Core Strategy could be delivered on previously developed land. This will contribute towards regional and national targets for the use of previously developed land.
- 3.26 Developable sites “should be in a suitable location for housing development and there should be a reasonable prospect that the site is available, and could be developed at the point envisaged” (PPS3).
- 3.27 Lake Lothing is considered a suitable location for housing development, since it will provide land in accessible locations with good access to public transport, services and facilities.
- 3.28 Development within the URC area is considered to have good prospects of delivery because:

- it is being led by an Urban Regeneration Company specifically charged with this responsibility
- it will provide land in locations which meets the needs of a large proportion of the District's existing residents and businesses
- it reflects existing patterns of need and demand for housing and other uses.

3.29 Sites within Lake Lothing are considered to be deliverable in the medium to long term, rather than the short term. New developments within this area were not included when identifying a "5-year supply" of housing land in Waveney. This allows time for necessary infrastructure to be delivered and options explored for addressing flood risk in the area. However, if for any reason sites within the Lake Lothing area were not deliverable in the medium term, the contingency would be an early review of the Core Strategy to identify other options.

**c) Flood Risk Assessments**

3.30 Part c of the Exceptions Test will be addressed by individual applications. Core Strategy Policy CS03 reiterates the national requirement that a Flood Risk Assessment will need to be carried out where appropriate, and states that the risk to development should be fully mitigated by design and engineering measures.

**4. Conclusion**

4.1 Comprehensive redevelopment of the Lake Lothing and Outer Harbour Area of central Lowestoft will contribute positively towards the sustainable development of Waveney. The need for regeneration of the heart of Lowestoft has been endorsed by the Government through the establishment of 1<sup>st</sup> East URC as a local delivery vehicle. The Regional policy context also supports this approach. There are no sequentially better sites that would be appropriate for the full range of uses proposed, nor deliver the synergistic benefits offered by allocating this brownfield and largely vacant, central, area for mixed-use development.

## Appendix 1. Sustainability Appraisal of selected Core Strategy policies and 'Do Nothing' options

### Key To Scores

++	Major positive
+	Minor positive
-	Minor negative
--	Major negative
0	Neutral effect
?	Uncertain effect

### Core Strategy Policy CS01: SPATIAL STRATEGY

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	'Do Nothing' rating	Rating with policy	Comment
<b>SOCIAL</b>				
To improve the health of the population overall	Will it improve access to high quality, health facilities?	-	+?	Concentrating development in towns maintains access to facilities – though could put pressure on existing facilities unless new provision ensured in line with development.
	Will it reduce death rates?	0	0	
	Will it encourage healthy lifestyles?	-	?	Opportunities for walking/ cycling to work or school may increase in towns, yet countryside offers recreational opportunities for healthy lifestyles.
To maintain and improve levels of education and skills in the population overall	Will it improve qualifications and skills of young people?	0	0	
	Will it improve qualifications and skills of adults?	0	0	
To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0	0	
	Will it reduce the fear of crime?	0	0	
	Will it reduce noise and odour concerns?	0	0	
To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	0	+	Focus on regeneration, particularly in central Lowestoft where most of the deprived areas are located.
To improve access to key services for all sectors of the population	Will it improve accessibility to key local services?	-	+	Concentrating development in towns gives access to most people. However, limiting population growth in rural areas may affect viability of rural services/POs. Concentrating development in towns gives access to most people. However, limiting population growth in rural areas may affect viability of rural shops. Concentrating development in towns maintains access to facilities – though could put pressure on existing facilities unless new provision ensured in line with development.
	Will it improve accessibility to shopping facilities?	-	+	
	Will it improve access to childcare?	-	+	

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	'Do Nothing' rating	Rating with policy	Comment
To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce unemployment overall?	-?	+	Jobs growth in the towns, close to existing areas of high unemployment.
	Will it reduce long-term unemployment?	-?	0	
	Will it provide job opportunities for those most in need of employment?	-?	+	Jobs growth in the towns, close to existing areas of high unemployment.
	Will it help to improve earnings?	0	+	Encourages key employment sectors, with opportunities for more highly paid jobs.
To meet the housing requirements of the whole community	Will it reduce homelessness?	0	0	
	Will it provide enough housing?	+	+	Provided there are enough housing sites inside the limits of the towns.
	Will it increase the range and affordability of housing for all social groups?	-	++	Meet demands for affordable housing in rural areas.
	Will it reduce the number of unfit homes?	0	0	
To improve the quality of where people live and to encourage community participation	Will it improve the satisfaction of people with their neighbourhood as a place to live?	-	?	Depends on design and integration of new housing, and whether services are provided in line with growth.
	Will it increase access to natural green space?	0	+	Protection and enhancement of open space is integral to policy. Some provision associated with new development.
	Will it encourage engagement in decision making?	0	0	
	Will increase the number of people involved in volunteer activities?	0	0	
	Will it improve ethnic relations?	0	0	
	Will it improve access to cultural facilities?	-	+?	Concentrating development in towns maintains access to facilities – though could put pressure on existing facilities unless new provision ensured in line with development.
<b>ENVIRONMENTAL</b>				
To maintain and where possible improve water and air quality	Will it improve the quality of inland waters?	+/0	0	
	Will it improve the quality of coastal waters?	+/0	0	
	Will it improve air quality?	-	+	Concentrating development in towns reduces need to travel – less car travel and congestion.
To conserve soil resources and quality	Will it minimise the loss of greenfield land to development?	--	++/-	Concentrates development on PDL and in existing limits. However, could lead to some loss, particularly with meeting affordable housing needs in the countryside. See above.
	Will it minimise loss of the best and most versatile agricultural land to development?	--	++/-	
	Will it maintain and enhance soil quality?	0	+	Need to find sites in towns could lead to restoration of contaminated/ previously developed land.
To use water and mineral resources efficiently, and re-use and recycle where possible	Will it promote sustainable use of minerals?	0	0	
	Will it promote sustainable use of water?	0	0	
	Will it maintain water availability for water dependant habitats?	0	0	

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	'Do Nothing' rating	Rating with policy	Comment
To reduce waste	Will it reduce household waste? Will it increase waste recovery and recycling?	0 0	0 0	
To reduce the effects of traffic on the environment	Will it effect traffic volumes?  Will it reduce the need for local travel?  Will it increase the proportion of journeys made using modes other than the private car?	-  --  -	+/-  ++  +	Concentrating growth in towns where public transport is best and need to travel is reduced, helps minimise traffic growth. However, may lead to congestion on existing routes within towns? Most development in towns, and distance to services minimised. Shorter journeys to work/ school and better provision of public transport etc in towns.
To reduce contributions to climate change	Will it reduce emissions of green house gases by reducing energy consumption?  Will it increase the proportion of energy needs being met by renewable sources?	-?  0	0  0	No impact on household energy consumption, but reduction in car emissions.
To reduce vulnerability to climatic events	Will it minimise the risk of flooding to people and property from rivers and watercourses?  Will it minimise the risk of flooding to people and property on the coast?  Will it reduce the risk of coastal erosion? Will it reduce the risk of damage to people and property from storm events?	0  0  0 0	+ / -?  + / -?  0 + / -?	Has the potential to put pressure on building in areas vulnerable to flooding within towns – mitigated by location of development, design and conditions. See above. Policy states that improved flood protection measures are essential in Lowestoft. See above.
To conserve and enhance biodiversity and geodiversity	Will it maintain and enhance sites designated for their nature conservation interest?  Will it avoid disturbance or damage to protected species and their habitats? Will it avoid disturbance and damage to Suffolk Biodiversity Action Plan habitats and species, and help deliver the actions within the Suffolk Biodiversity Action Plan? Will it help to reverse the national decline in farmland birds? Will it protect and enhance sites, features and areas of geodiversity value in both urban and rural areas?	-  - - - -	+  + + + +	Minimises greenfield development and disturbance to the countryside (most protected sites/ species are located outside towns). Policy states that green infrastructure should be protected and enhanced. See above. See above. See above. Minimises greenfield development and disturbance to the countryside (most protected sites/ species are located outside towns). Policy states that green infrastructure should be protected and enhanced.
To conserve and where appropriate enhance areas of historical and archaeological importance	Will it protect and enhance sites, features and areas of historical and cultural value in both urban and rural areas?	0	0	Potential for loss/ damage with increased development associated with policy is avoided by need to protect and enhance local distinctiveness. Mitigate through site selection, design and conditions. Rural sites and character are protected.

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	'Do Nothing' rating	Rating with policy	Comment
	Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas?	0	+ / -	May put more pressure on urban sites, but protects rural ones. Mitigate through site selection, design and conditions.
To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Will it reduce the amount of derelict, degraded and underused land?	--	++	Concentrating development in towns increases use of PDL, and makes efficient use of land in town limits. Policy includes PDL targets. Increased development may impact on urban townscape, but rural settlements and landscape are generally protected. Mitigate through site selection, design and conditions.
	Will it improve the landscape and/or townscape?	-/+	+ / -	
<b>ECONOMIC</b>				
To achieve sustainable levels of prosperity and economic growth throughout the plan area	Will it improve business development and enhance competitiveness?	?	+	Makes provision for employment growth across District, including in key sectors.
	Will it improve the resilience of business and the economy?	?	+	Makes provision for employment growth across District, including in key sectors.
	Will it promote growth in key sectors?	0	++	Key employment sectors are promoted.
	Will it improve economic performance in advantaged and disadvantaged areas?	0	+	Could help regenerate towns, particularly central Lowestoft and allows for rural economic development.
	Will it encourage rural diversification?	0	++	Med-long term. Encouraged by policy.
To revitalise town centres	Will it increase the range of employment opportunities, shops and services available in town centres?	-	+	Resists out of town development.
	Will it decrease the number of vacant units in town centres?	-	+	See above.
To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	-	+	Concentrating house building in towns has potential to reduce commuting / car use, but it relies on behaviour of residents.
	Will it improve accessibility to work by public transport, walking and cycling?	--	++	Long-term. Growth concentrated in towns, some of which have rail links.
	Will it increase the proportion of freight transported by rail or other sustainable modes?	-	+?	
	Will it increase the consumption of locally produced food and good?	0	+?	Possibly, as farm shops and farmers markets able to increase.
To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	?	+	Makes provision for employment growth and regeneration across District, including in key sectors.
	Will it encourage inward investment?	?	+	Makes provision for employment growth and regeneration across District, including in key sectors.
	Will it make land available for business development?	?	+	Makes provision for employment growth across District



## Core Strategy Policy CS03: FLOODING & COASTAL EROSION

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	'Do Nothing' rating	Rating with policy	Comment
<b>SOCIAL</b>				
To improve the health of the population overall	Will it improve access to high quality, health facilities?	0	0	
	Will it reduce death rates?	-	0	
	Will it encourage healthy lifestyles?	0	0	
To maintain and improve levels of education and skills in the population overall	Will it improve qualifications and skills of young people?	0	0	
	Will it improve qualifications and skills of adults?	0	0	
To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0	0	
	Will it reduce the fear of crime?	0	0	
	Will it reduce noise and odour concerns?	0	0	
To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	0	0	
To improve access to key services for all sectors of the population	Will it improve accessibility to key local services?	0	0	
	Will it improve accessibility to shopping facilities?	0	0	
	Will it improve access to childcare?	0	0	
To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce unemployment overall?	0	0	
	Will it reduce long-term unemployment?	0	0	
	Will it provide job opportunities for those most in need of employment?	0	0	
	Will it help to improve earnings?	0	0	
To meet the housing requirements of the whole community	Will it reduce homelessness?	0	0	Could be local impact, but unlikely to have a significant effect overall. Housing growth can be accommodated with policy.
	Will it provide enough housing?	+?	0	
	Will it increase the range and affordability of housing for all social groups?	0	0	
To improve the quality of where people live and to encourage community participation	Will it reduce the number of unfit homes?	-	+	Reduces risk of homes becoming uninhabitable due to flooding or erosion.
	Will it improve the satisfaction of people with their neighbourhood as a place to live?	-?	?	
	Will it increase access to natural green space?	0	0	
	Will it encourage engagement in decision making?	0	0	
	Will increase the number of people involved in volunteer activities?	0	0	
	Will it improve ethnic relations?	0	0	
Will it improve access to cultural facilities?	0	0		
<b>ENVIRONMENTAL</b>				
To maintain and where possible improve water and air quality	Will it improve the quality of inland waters?	-	+	Indirect effect of preventing development near rivers. Indirect effect of preventing development near coast.
	Will it improve the quality of coastal waters?	-	+	
	Will it improve air quality?	0	0	
To conserve soil resources and quality	Will it minimise the loss of greenfield land to development?	0	++	Locating development in Lake Lothing avoids need for greenfield sites. However policy could prevent development of some PDL sites in other areas.

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	'Do Nothing' rating	Rating with policy	Comment
	Will it minimise loss of the best and most versatile agricultural land to development? Will it maintain and enhance soil quality?	0 0	0 0	
To use water and mineral resources efficiently, and re-use and recycle where possible	Will it promote sustainable use of minerals? Will it promote sustainable use of water?  Will it maintain water availability for water dependant habitats?	0 0 -	0 +? +	Climate change could reduce water supply so new development should be designed to reduce water use. See above. Plus sustainable drainage reduce run-off and increase supply of water to natural systems.
To reduce waste	Will it reduce household waste? Will it increase waste recovery and recycling?	0 0	0 0	
To reduce the effects of traffic on the environment	Will it effect traffic volumes? Will it reduce the need for local travel? Will it increase the proportion of journeys made using modes other than the private car?	0 0 0	0 0 0	
To reduce contributions to climate change	Will it reduce emissions of green house gases by reducing energy consumption? Will it increase the proportion of energy needs being met by renewable sources?	0 0	0 0	
To reduce vulnerability to climatic events	Will it minimise the risk of flooding to people and property from rivers and watercourses? Will it minimise the risk of flooding to people and property on the coast?  Will it reduce the risk of coastal erosion? Will it reduce the risk of damage to people and property from storm events?	-- -- -- --	++ ++ / - ++ ++ / -	Reduces risk to new development from the outset. Increased impact as more development takes place. See above. However, residual risk in Lake Lothing area will remain and will need to be mitigated. See above. See above. However, residual risk from storm surges in Lake Lothing area will remain and will need to be mitigated.
To conserve and enhance biodiversity and geodiversity	Will it maintain and enhance sites designated for their nature conservation interest?  Will it avoid disturbance or damage to protected species and their habitats? Will it avoid disturbance and damage to Suffolk Biodiversity Action Plan habitats and species, and help deliver the actions within the Suffolk Biodiversity Action Plan? Will it help to reverse the national decline in farmland birds? Will it protect and enhance sites, features and areas of geodiversity value in both urban and rural areas?	-  - - 0 -	+?  +? +? 0 0	Long term. Sustainable drainage reduce run-off and increase supply of water to natural systems – impact on water supply to habitats and wildlife. Indirect effect of preventing development near water based habitats (e.g. broads, rivers, fens, marshes). See above. See above.
To conserve and where appropriate enhance areas of historical and archaeological importance	Will it protect and enhance sites, features and areas of historical and cultural value in both urban and rural areas? Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas?	0 0	0 0	

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	'Do Nothing' rating	Rating with policy	Comment
To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Will it reduce the amount of derelict, degraded and underused land?	+?	++	Locating development in Lake Lothing makes use of vacant sites. However policy could prevent development of some PDL sites in other areas.
	Will it improve the landscape and/or townscape?	0	0	
<b>ECONOMIC</b>				
To achieve sustainable levels of prosperity and economic growth throughout the plan area	Will it improve business development and enhance competitiveness?	-	0	Although policy will enable CS05, and its positive impacts in this and other areas.  Lake Lothing AAP area contains disadvantaged areas.
	Will it improve the resilience of business and the economy?	-	0	
	Will it promote growth in key sectors?	-	0	
	Will it improve economic performance in advantaged and disadvantaged areas?	-	++	
	Will it encourage rural diversification?	0	0	
To revitalise town centres	Will it increase the range of employment opportunities, shops and services available in town centres?	0	++	Positive impact on Lowestoft town centre from developing Lake Lothing AAP area. See above.
	Will it decrease the number of vacant units in town centres?	0	+	
To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	0	+	See above. See above.
	Will it improve accessibility to work by public transport, walking and cycling?	0	++	
	Will it increase the proportion of freight transported by rail or other sustainable modes?	0	0	
	Will it increase the consumption of locally produced food and good?	0	0	
To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	0	0	Could be local impact, but unlikely to have a significant effect overall. Employment uses can be accommodated with policy.
	Will it encourage inward investment?	-	0	
	Will it make land available for business development?	+?	0	

## Core Strategy Policy CS05: AREA ACTION PLAN FOR LAKE LOTHING

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	'Do Nothing' rating	Rating with policy	Comment
<b>SOCIAL</b>				
To improve the health of the population overall	Will it improve access to high quality, health facilities?	0	+	Local impact associated with new facilities
	Will it reduce death rates?	0	0	
	Will it encourage healthy lifestyles?	0	+	Local impact associated with more open space
To maintain and improve levels of education and skills in the population overall	Will it improve qualifications and skills of young people?	0	+	Local impact associated with new facilities
	Will it improve qualifications and skills of adults?	0	+	Local impact associated with new facilities
To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0	+	Local impact associated with creation of well-designed, safe new environment.
	Will it reduce the fear of crime?	0	+	
	Will it reduce noise and odour concerns?	0	+	Through regeneration of a former industrial area.
To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	-	++	Aims to bring jobs and services to a deprived area of Lowestoft.
To improve access to key services for all sectors of the population	Will it improve accessibility to key local services?	-	+	Local improvement, with key services brought to the Lake Lothing area.
	Will it improve accessibility to shopping facilities?	0	+ / -?	Will provide new retail floorspace to expand and enhance Lowestoft town centre to south. However, this could impact on northern parts of town centre.
	Will it improve access to childcare?	0	+?	If childcare facilities are provided among the community facilities.
To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce unemployment overall?	-	+	Aims to provide jobs in an area with high unemployment.
	Will it reduce long-term unemployment?	-	+	See above.
	Will it provide job opportunities for those most in need of employment?	-	+	See above.
	Will it help to improve earnings?	-	+?	Depends on the type of jobs created.
To meet the housing requirements of the whole community	Will it reduce homelessness?	0	+	Affordable housing will be created.
	Will it provide enough housing?	0	+	
	Will it increase the range and affordability of housing for all social groups?	0	+	A mix of housing will be built.
	Will it reduce the number of unfit homes?	0	0	
To improve the quality of where people live and to encourage community participation	Will it improve the satisfaction of people with their neighbourhood as a place to live?	-	++	Large-scale regeneration improves wider perception of Lowestoft as well as resident satisfaction.
	Will it increase access to natural green space?	0	0	
	Will it encourage engagement in decision making?	0	0	
	Will increase the number of people involved in volunteer activities?	0	0/?	Perhaps greater local involvement as result of enhanced cohesion and pride in community?
	Will it improve ethnic relations?	0	0	
	Will it improve access to cultural facilities?	0	+	Creation of facilities for residents and population of Waveney in general.

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	'Do Nothing' rating	Rating with policy	Comment
<b>ENVIRONMENTAL</b>				
To maintain and where possible improve water and air quality	Will it improve the quality of inland waters?	-	+	Through regeneration of a former industrial site.
	Will it improve the quality of coastal waters?	-	+	
	Will it improve air quality?	0	0	
To conserve soil resources and quality	Will it minimise the loss of greenfield land to development?	-	++	Lake Lothing is a large brownfield area and its redevelopment minimises need for greenfield development. See above.
	Will it minimise loss of the best and most versatile agricultural land to development?	-	+	
	Will it maintain and enhance soil quality?	-	+	Contaminated former industrial sites may be restored.
To use water and mineral resources efficiently, and re-use and recycle where possible	Will it promote sustainable use of minerals?	0	+	Aims to minimise use of resources. Minor, local impact. See above.
	Will it promote sustainable use of water?	0	+	
	Will it maintain water availability for water dependant habitats?	0	0	
To reduce waste	Will it reduce household waste?	0	0	
	Will it increase waste recovery and recycling?	0	0	
To reduce the effects of traffic on the environment	Will it effect traffic volumes?	?	?	Aims to decrease congestion. May be offset by increasing visitors to the area. Mixed use development, providing jobs, housing and services close by. May have local impact.
	Will it reduce the need for local travel?	-	+	
	Will it increase the proportion of journeys made using modes other than the private car?	-?	+	
To reduce contributions to climate change	Will it reduce emissions of green house gases by reducing energy consumption?	0	0	Aims to make best use of renewable technologies.
	Will it increase the proportion of energy needs being met by renewable sources?	0	+	
To reduce vulnerability to climatic events	Will it minimise the risk of flooding to people and property from rivers and watercourses?	-	+ / -	Lake Lothing is near the Broads and in a tidal floodplain. . Improving flood defences will have benefits for wider area. Potential for flooding must be mitigated in all development and residual risk should be considered. Area is currently at significant risk from tidal flooding. Improving flood defences will have benefits for wider area. Potential for flooding must be mitigated in all development and residual risk should be considered. See above.
	Will it minimise the risk of flooding to people and property on the coast?	-	+ / -	
	Will it reduce the risk of coastal erosion? Will it reduce the risk of damage to people and property from storm events?	0 -	0 -	
To conserve and enhance biodiversity and geodiversity	Will it maintain and enhance sites designated for their nature conservation interest?	-?	0	The 2 County Wildlife Sites in the area are on sea/harbour walls and these structures will not be affected by policy. Depends on location and nature of development, which will be considered through Area Action Plan.
	Will it avoid disturbance or damage to protected species and their habitats?	-?	?	

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	'Do Nothing' rating	Rating with policy	Comment
	Will it avoid disturbance and damage to Suffolk Biodiversity Action Plan habitats and species, and help deliver the actions within the Suffolk Biodiversity Action Plan?	-?	+	Local enhancement of wildlife and habitats.
	Will it help to reverse the national decline in farmland birds?	-?	+?	Lake Lothing is a large brownfield area and its redevelopment minimises loss of farmland to development.
	Will it protect and enhance sites, features and areas of geodiversity value in both urban and rural areas?	0	0	
To conserve and where appropriate enhance areas of historical and archaeological importance	Will it protect and enhance sites, features and areas of historical and cultural value in both urban and rural areas?	-	+	Utilises maritime culture of the area.
	Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas?	0	0	
To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Will it reduce the amount of derelict, degraded and underused land?	--	++	Lake Lothing is currently a large, underused brownfield site.
	Will it improve the landscape and/or townscape?	--	++	Regeneration of a formerly industrial, waterfront site.
<b>ECONOMIC</b>				
To achieve sustainable levels of prosperity and economic growth throughout the plan area	Will it improve business development and enhance competitiveness?	-	++	Providing jobs and improving perception of Lowestoft area.
	Will it improve the resilience of business and the economy?	-	++	See above, plus promotion of new sectors.
	Will it promote growth in key sectors?	0	++	Creates opportunities in key sectors such as tourism and renewable energy.
	Will it improve economic performance in advantaged and disadvantaged areas?	-	++	It will bring jobs to a disadvantaged area.
	Will it encourage rural diversification?	0	0	
To revitalise town centres	Will it increase the range of employment opportunities, shops and services available in town centres?	0	++ / -?	Development and economic growth in this area may have negative impact on town centre, as currently defined, especially to the north. Expanding and enhancing town centre could increase attraction of Lowestoft town centre as a whole, with benefits for existing shops and services. More people living and working nearby could increase vitality.
	Will it decrease the number of vacant units in town centres?	0	+ / -?	See above.
To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	-	+ / ?	Mixed use development may reduce commuting, but could attract more people into area for work.
	Will it improve accessibility to work by public transport, walking and cycling?	0	+	
	Will it increase the proportion of freight transported by rail or other sustainable modes?	0	0	
	Will it increase the consumption of locally produced food and good?	0	0	
To encourage and accommodate both indigenous and	Will it encourage indigenous business?	-	+	Providing jobs and improving perception of Lowestoft area.
	Will it encourage inward investment?	-	++	

SA Objective	Question: Will this policy / proposal / plan / strategy help to.....	'Do Nothing' rating	Rating with policy	Comment
inward investment	Will it make land available for business development?	0	++	Lake Lothing is a large brownfield site with potential for business development.

If you would like this Local Development Framework document in another language, large print, Braille or audio format, please telephone 01502 523029 or email [planningpolicy@waveney.gov.uk](mailto:planningpolicy@waveney.gov.uk)

#### Polish

Jeżeli chcieliby Państwo otrzymać ten dokument w innym języku lub w innym formacie albo jeżeli potrzebna jest pomoc tłumacza, to prosimy o kontakt z nami.

#### Portuguese

Por favor peça se desejar este documento: documento da Estrutura de Desenvolvimento Local, noutra língua, em impressão grande, Braille ou formato de áudio, por favor telephone o seguinte número: 01502 523029

#### Chinese

此檔案本地發展架構文件備有多種語言及不同的型式版本，如字體方大、盲人點字或錄音聲帶等。  
如有需要請致電：01502 523029

#### Hindi

अगर आप इस स्था नी यदि का सके सं धार का दस्ता वे ज दू सरे भा षा मे चा हते हो या उसे बड़े अक्ष र, ब्रे ल या श्र वण के मा ध्य म से स सिल करना चा हते हो तो क पया 01502 523029 पर सं पके कि जी ए ।

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