



## Lowestoft Neighbourhood Plan Referendum

### Summary of Representations

This document contains summaries of the representations made in response to the consultation on the Submission Lowestoft Neighbourhood Plan which was held between 23<sup>rd</sup> April and 4<sup>th</sup> June 2025. The representations were submitted to the Examiner for consideration during the Examination of the Lowestoft Neighbourhood Plan. Full copies of the representations can be viewed on the following webpage:

<https://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-plans-in-the-area/lowestoft-neighbourhood-area/>

Respondent	Summary
East Suffolk Council	<p>East Suffolk Council supported the Lowestoft Neighbourhood Plan, and it was considered that overall, it complements the East Suffolk- Waveney Local Plan (March 2019). The plan is well-rounded and aims to tackle the difficulties that face the town, however there were some outstanding matters.</p> <p><u>Comments about the submission document are set out below.</u></p> <p><b>Visions and Aims</b></p> <ul style="list-style-type: none"> <li>• This section could be expanded to better reflect the distinctiveness of Lowestoft.</li> <li>• Several amendments were recommended in terms of updating references and additional information that was considered necessary for the conciseness and clarity of the plan.</li> <li>• Mention projects delivered as part of the Towns fund and include objectives of the Lowestoft Investment Plan</li> </ul> <p><b>Comments on policies</b></p> <p><b>LOW1 – East Point Pavilion</b></p> <ul style="list-style-type: none"> <li>• Noted that East Suffolk Council owned the building and that the Neighbourhood Plan should not hinder any potential replacement.</li> </ul> <p><b>LOW2 – Kirkley Waterfront Site</b></p>

	<ul style="list-style-type: none"> <li>• The Council commented that reference should be made to local plan allocation policy WLP2.4 and that policy LOW2 will only apply to the part of the allocation that falls within the Lowestoft Neighbourhood Area. It was noted that whilst the desire for public access to the waterfront was encouraged, it should be made clear that the parts of the waterfront that fall in Lowestoft Neighbourhood area, should be used for employment uses and allowing public access to quayside employment areas might create problems. It was recommended that the policy should be revised to add more flexibility.</li> <li>• Suggested that the policy should be amended to reflect support for employment use on the quayside and that the supporting text should be updated to identify Brooke Marine and Jeld-Wen Mosaic County Wildlife Sites and that there should be reference to the role of Kirkley and the seafront area and how it relates to the town centre to ensure it is adequately referenced in the plan.</li> <li>• Include reference Battery green and Post Office redevelopments, what they will offer, and how they will benefit the town.</li> </ul> <p><b>LOW3 – Lowestoft Town Centre and Historic High Street</b></p> <ul style="list-style-type: none"> <li>• Commented that the approach to Listed Buildings was too inflexible and ignored the planning balance.</li> <li>• Recommended changes to the town centre outline to match the one in the Local Plan.</li> <li>• Recommended that the potential conflict between residential uses and the closeness of employment land was identified and that it should take account of amenity issues that may be caused. Furthermore, it was suggested that more supporting text needed to address the impacts of high-rise buildings in what is a predominantly low-rise town, and that clarification around the conversion of upper floors adjacent to the town centre was included to provide clarity.</li> </ul> <p><b>LOW4 Kirkley District Shopping Centre</b></p> <ul style="list-style-type: none"> <li>• Queried whether it would be possible or appropriate to attach conditions to ensure living conditions were acceptable and to reduce conflicts between residents and businesses. Any conditions would have to meet six key tests as outlined in the NPPF to be acceptable.</li> </ul> <p><b>LOW5 Historic Town Hall Regeneration</b></p> <ul style="list-style-type: none"> <li>• The approach to the town hall, its location and any impacts from future development were considered appropriate, however advice was given insofar as the</li> </ul>
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	<p>policy potentially being out of date as works are underway on the site and updates were recommended to reflect the current and immediate future of the Town Hall. Wording should be updated where appropriate to add clarity.</p> <ul style="list-style-type: none"> <li>• Commented that land to the west of the Town Hall is owned by East Suffolk Council, and this should have been made clear and that the policy should not restrict development on the land in the future.</li> </ul> <p><b>LOW6 Residential Development</b></p> <ul style="list-style-type: none"> <li>• Commented that the policy should ensure that any residential uses would not experience amenity issues from other uses nearby.</li> </ul> <p><b>LOW7 Former Lowestoft Hospital Site</b></p> <ul style="list-style-type: none"> <li>• Commented that while the protective policy of this heritage asset was welcome, any development would require significant engagement with the landowner and/or developer. It was also suggested that supporting text was updated to reflect sources for CIL funding.</li> </ul> <p><b>LOW9 Design and Character</b></p> <ul style="list-style-type: none"> <li>• Commented that the opportunity could be taken to encourage well designed parking areas, reflective of their surroundings while taking the opportunity to enhance natural drainage and biodiversity. Include a link to the Council's Sustainable Construction SPD</li> </ul> <p><b>LOW10 Green Infrastructure, Urban Green Spaces and Biodiversity</b></p> <ul style="list-style-type: none"> <li>• Duplicate wording to be removed.</li> <li>• Text should be expanded to include a link to the councils Statement of Community Involvement, (Appendix 7).</li> <li>• Requirement for small-scale improvements to the natural environment is also supported by the National Design Code and should be referenced.</li> <li>• Amended wording was suggested at criterion 4 to add clarity to the policy and prevent misinterpretation.</li> </ul> <p><b>LOW12 Port Development</b></p> <ul style="list-style-type: none"> <li>• It was suggested that the policy wording or supporting text could be amended to give examples of environmental improvements that make interpretation of the policy clearer and that reference should be included to certain Local Plan policies.</li> </ul> <p><b>LOW13 North Lowestoft Conservation Area and LOW14 – South Lowestoft and Kirkley Conservation Area</b></p> <ul style="list-style-type: none"> <li>• Remove any similarities and duplications and the wording used was confusing. Therefore, this should be amended for clarity.</li> </ul>
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	<ul style="list-style-type: none"> <li>It was suggested different wording should be used in South Lowestoft and Kirkley Conservation Area to reflect the different periods of development and the character of the area.</li> </ul> <p><b>LOW15 Local Heritage</b></p> <ul style="list-style-type: none"> <li>Recommended that a reference to East Suffolk Councils criteria for identification of NDHA's should be added.</li> </ul> <p><b>Section 10 Environment and Place</b></p> <ul style="list-style-type: none"> <li>Recommended expanding this section to mention other significant green spaces in the town which would give a more complete view of the town, and links to documents should be added for clarity.</li> <li>Provide clarity about how the policy will augment local plan policy WLP8.23 relevant areas should be clearly identified in the neighbourhood plan.</li> </ul> <p><b>LOW16 Strategic Green Landscape</b></p> <ul style="list-style-type: none"> <li>East Suffolk Council own land within the land allocation for Strategic Green Spaces and the policy should allow for leisure or tourism use if it has been sensitively designed to allow the area to continue contributing to Lowestoft's economy. Insert a link or footnote for supporting document 3.</li> </ul> <p><b>LOW17 Local Green Spaces</b></p> <ul style="list-style-type: none"> <li>Recommended that the term 'exceptional circumstances' should be explained for clarity.</li> </ul> <p><b>LOW18 Recreational and Sports Spaces</b></p> <ul style="list-style-type: none"> <li>Recommended that the supporting text should reference the open space designations of local plan policy WLP8.23</li> </ul> <p><b>Page 62: Section 11 Transport and Movement</b></p> <ul style="list-style-type: none"> <li>Update text to include the opening of the Gull Wing bridge in 2024 and that to consider the impact this has had on traffic movement in the town.</li> <li>Recommended that ongoing public realm works at Royal green be referenced. Include text on the active cycle hub and electric car charging points.</li> </ul> <p><b>LOW19 Balanced Transport Provision</b></p> <ul style="list-style-type: none"> <li>Recommended that Criterion 2 should be read in accordance with the Suffolk Design Streets Guide (2022) and LTN 1/20 and should be referenced and footnotes added. Update references to the latest version of Suffolk Guidance for Parking (2023). State that a proportion of on-street parking should be used where appropriate.</li> <li>Include references to the East Suffolk Cycling and Walking Strategy.</li> </ul> <p><b>Section 12 Sustainable Energy</b></p>
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	<ul style="list-style-type: none"> <li>Recommended this section has additional detail and clarification included around policy WLP8.27 of the local plan which required areas to be identified in neighbourhood plans, however only Local Energy Schemes were mentioned.</li> </ul> <p><b>LOW20 Local Energy Schemes</b></p> <ul style="list-style-type: none"> <li>Commented that further information was needed to state what type of energy scheme was defined.</li> <li>Recommended that information should include the physical size of developments and generation capacity to help ascertain if a proposal is a local energy scheme.</li> </ul> <p><b>General Comments</b></p> <ul style="list-style-type: none"> <li>Recommended referencing the Partnership Scheme in a Conservation Area (PSiCA) which attracts investment for the improvement of high street shop frontages.</li> <li>Advised that references to Conservation Areas should be consistent throughout the plan.</li> <li>Recommended updating all maps to ensure the Gull Wing bridge was shown.</li> <li>Recommended that recognition should be given to all the projects that the Town Council are leading on such as the Town Hall project and Marina Theatre Refurbishment and that these projects should be given more content in the Neighbourhood Plan. Reference to this would illustrate investment, ensuring the future of the town and its significance, and that important buildings and projects which are fundamental to the future of the town.</li> <li>Finally, the Town Council were commended on producing a well-rounded plan and that it was trying to tackle some of the difficulties facing the town.</li> </ul>
<b>Environment Agency</b>	They identified that the Neighbourhood Plan Area will be affected by flood risk and any new development to be sited within the flood plain should consider the general flood risk guidance and the advice contained within the Planning Practice Guidance. Further comments were given regarding water resources and reducing water demand.
<b>Historic England</b>	They referred to their comments made at Regulation 14 stage and had no further comments to add.
<b>Natural England</b>	No specific comments were submitted on this draft neighbourhood plan however they did request that attention is drawn to information that is included in the general standing advice. This advice covers.

	<ul style="list-style-type: none"> <li>• Natural environment information sources</li> <li>• National Character Areas</li> <li>• Natural Environment issues which include landscape, wildlife habitats, priority and protected species, best and most versatile agricultural land</li> <li>• Improving the natural environment</li> </ul>
<b>Suffolk County Council</b>	<p>They welcomed the changes made in the plan in response to earlier Regulation 14 comments.</p> <p>Their comments included referencing the Historic Environment Record for Suffolk and adding reference to Minerals and Waste policies.</p> <p>They recommended rewording of policy LOW10 and commented on the consistency of the plan, and the plan should be reviewed to ensure continuity and clarity.</p>
<b>Suffolk Wildlife Trust</b>	<p>They commented that they have no concerns over policies and support the policy aims to protect biodiversity.</p> <p>Policy LOW8 – Residential Mix and Standards: they supported the policy wording which promotes biodiversity and positive design and landscape features.</p> <p>Policy LOW9 – Design and Character: they supported the policy wording which promotes biodiversity.</p> <p>Policy LOW10 – Green Infrastructure, Urban Green Spaces and Biodiversity: they supported the aims of the policy to protect biodiversity.</p> <p>County Wildlife Sites: they suggested that to fully meet requirements of the NPPF County Wildlife Sites should be identified and included.</p>
<b>Anglian Water</b>	<p>They welcomed changes made as a result of comments made at Regulation 14 stage.</p> <p>Anglian Water commented on LOW17 Local Green Spaces and supporting text that this would provide scope for Anglian Water Services to undertake operational development to maintain and repair any underground network assets that may be within the LGS areas.</p> <p>Anglian Water Services state that they did not wish to object to the designation of important community assets but that they believed that the current policy wording was not consistent</p>

	<p>with the NPPF (para. 108 Green Belt). They commented that LOW17 should provide the correct policy basis for decision making and should be amended to reflect the NPPF and alternative wording was recommended.</p>
<b>Norfolk &amp; Waveney Integrated Care System</b>	<p>The ICS welcomed the support in the plan to ensure suitable and sustainable provision of healthcare services for the residents in the plan area.</p>
<b>Statuslist Ltd (Pegasus Group)</b>	<p>Statuslist have stated that they are broadly supportive of the themes expressed within the draft Plan and that the vision and aims align with the aspirations of their client to deliver a high-quality and sustainably designed and constructed new neighbourhood on Kirkley Waterfront.</p> <p><b>Residential Development</b></p> <p>Statuslist noted that the allocated site (WLP2.4) partly falls within the Lowestoft Neighbourhood Plan area and that the neighbourhood plan recognises the strategic importance of Kirkley Waterfront and that it supports any future development and to ensure that it is sustainable, high-quality and appropriate for its location. They also note the Town Councils recognition of the importance of the site and efficient land-use for regeneration.</p> <p>Statuslist raised the point that the Development Brief Sustainable Urban Neighbourhood and Kirkley Waterfront Development Brief Supplementary Planning Document (SPD, 2013) is out-of-date. However, a Planning Position Statement is being prepared which updates the objectives and priorities and as such the wording should be amended to reference any successor documents and ensure consistency with policy LOW2.</p> <p><b>Policy LOW2 – Kirkley Waterfront Site</b></p> <p>Statuslist stated that they support this policy in principle and that there is a clear focus on creating a high-quality urban waterfront which includes both residential and employment uses. However, they have commented that greater flexibility in policy wording would be an advantage and to ensure that any schemes are viable and can be delivered in a timely way.</p> <p>Statuslist also commented that the development principles, whilst agreeable in principle, should remain flexible given the constrained nature of the site and to prevent delays in bringing the site back into use. They have also suggested further amendments to part 2 of the policy wording.</p>

	<p>They have also referenced access to the waterfront edge and that public access is not predictable as there are conflicts between public access and the use of the waterside for employment use. However, appropriate public access can be provided from an alternative route in the wider site allocation which can be linked via appropriate green infrastructure. Nevertheless, they have reiterated that public access to the waterfront within the Former Jeld Wen Factory part of the site is not possible.</p> <p>Statuslist go on to say that masterplanning of the site is necessary to ensure that attractive views of the waterfront are available throughout the site along the proposed Green Streets running through the site in recognition of the value that blue and green infrastructure can have in enhancing the quality and legibility of developments, while also ensuring that the quayside remains commercially attractive whilst protecting ecological interests. As such they have recommended wording amendments to the policy.</p> <p>Statuslist have confirmed support of the supporting text outlining the expectations of the site producing exemplar design and being a positive symbol of the transformation of Lowestoft whilst maintain their opinion that public access to the waterfront is not deliverable within the Former Jeld Wen Factory site.</p> <p><b>LOW8: Residential Mix and Standards</b></p> <p>Statuslist have confirmed that they are supportive of this policy and that part 1 considers a range of housing types and tenures to ensure a good choice off accommodation that will help to create a mixed and balanced community. However, they have also commented that flexibility will be needed to ensure that a viable scheme can be delivered. They also support the wording of Part 3 which addresses the need for affordable housing provision where there is an affordable housing requirement. They also go on to consider parts 4 and 5 of the policy which are both supported.</p> <p><b>LOW19 – Balanced Transport Provision</b></p> <p>Statuslist are supportive of the aims of Policy LOW19 and the aims to reduce the impact of developments on the local road network and encourage sustainable modes of travel.</p> <p><b>General comments</b></p> <p>Statuslist are generally supportive of the Neighbourhood Plan while recognising the importance of future growth in the town</p>
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	<p>and to ensure that this is delivered in a high-quality and aspirational manner to ensure developments reflect and enhances local character.</p> <p>They have also stated that subject to recommendations they have made that the Neighbourhood Plan will accord with the relevant legislation and be in general conformity with the strategic policies of the Local Plan.</p>
<b>A Lee</b>	<p>They queried the rationale for having the parish boundaries cutting through the Parkhill estate with residents being in Oulton and others in Lowestoft. They also noted that the map was missing the A12 heading north.</p>
<b>D Ray</b>	<p>Commented that it is mentioned at point 6.6 that a flooding policy forms part of the plan, but flooding is not mentioned after that. They also stated that the first Regulation 14 consultation draft included a section on Flooding and Coastal Erosion however this has since been omitted.</p> <p>They raised the fact that both Suffolk County Council and the Environment Agency mentioned that the plan is remiss in omitting the section on flooding.</p> <p>They acknowledge that the topic is covered in the Waveney Local Plan (policy WLP8.24) but the Local Plan does not consider the cessation of work on the tidal barrier. They further commented that Lowestoft faces specific challenges as the largest urbanized coastal area in the UK without permanent flood defences.</p> <p>They also stated that the plan covers 15 years, however they also commented that climate change is becoming less predictable, and that it would be prudent to reinstate the section on flooding and coastal erosion to protect Lowestoft in the future and its residents.</p>
<b>G Redpath</b>	<p>Comments were submitted which stated that cycling is a key mode of transport through the town, but that nothing has happened in the town since 2022. However, they did raise concerns that there are now 'No Cycling' signs painted along the cliff top so there is no access available for cyclists and school children to and from the two Pakefield schools along a busy arterial route.</p> <p>They also stated that they had worries that the cliff top is stated as a major cycling route in the Council's Cycling &amp; Walking</p>

	Strategy (2022) but there are 'No Cycling' signs across the scenic cliff top path which will deter people from cycling which is against the aims of the strategy.
<b>K Stott</b>	Commented that the September 2022 draft plan included a chapter and related policy on flooding but noted that neither of these were present in the final draft and questioned why there is no mention of flooding in the plan. They also raised the risk of fluvial and tidal flooding along Kirkley Stream and Lake Lothing which are significant factors that will affect sustainable development in key areas of the town. They also commented that the particular nature of the risks and remedies specific to Lowestoft should form a part of the Neighbourhood Plan.
<b>M Parsons</b>	Commented that Lowestoft Neighbourhood Plan is a plan for the town of Lowestoft but there are no documents or contents in the plan which evidence flooding protection in the town and that there is no consideration of the risks of flooding to people living in Lowestoft. They commented on the fact that the future plan is to not include flooding in the plan and thereby leave Lowestoft vulnerable to sea flooding and without flood protection.
<b>P Johnston</b>	<p>Raised the fact that flooding is mentioned in paragraph 6.6 but there is no further mention of flooding or a flooding policy. They commented that Lowestoft is a seaside town with a history of flooding and that this risk of flooding is increasing and that Lowestoft is the largest seaside town in the UK without permanent flood defences.</p> <p>They also commented that it does not make sense why flood risk is not mentioned in the neighbourhood plan especially as the flood barrier has not been built. They also commented that it should be set out how planning applications (for example) should be assessed and that any person looking at this plan would assume that there is no flood risk in the town which is not the case.</p>
<b>R Chilvers</b>	Commented that the flood barrier was promoted as a critical national infrastructure project as Lowestoft town and docks does not have any permanent flood defences, but short terms projects removed funding from the barrier project. They stated that documentation shows that the failure to construct the barrier compromises not just Kirkley waterfront but also the Gull Wing bridge.
<b>R de Brea</b>	Commented that the neighbourhood plan should place flood protection as a headline above everything else. They stated that

	<p>without it, everything else will be thrown into disarray and that Lowestoft deserves better and stated that considered that the neighbourhood plan was blinkered.</p>
<b>Use Your Voice</b>	<p>Commented that the current draft plan fails to address the single most important strategic challenge facing the town which is flood risk and that Lowestoft is now England's most vulnerable urban centre to both tidal and river flooding.</p> <p>They stated that the draft Local Neighbourhood Plan made no mention of this major change to the town's flood resilience strategy and did not explore the implications of the cancellation of the barrier on allocated development sites nor how the quality, design and location of development may have to change in the context of the barrier not being delivered. They also commented that there were errors in the plan as it stated that at paragraph 6.6 it contained a flood risk policy but that there was no policy in the draft plan.</p> <p>Use Your Voice stated that they have sought for two years to put forward proposals that would enhance the Local Neighbourhood Plan and make it a policy vehicle for real and sustainable strategic growth in the town. They commented that they felt the plan, as currently drafted, was not fit for this purpose.</p>