

Responses to Lowestoft Neighbourhood Plan

Regulation 16 Publicising a Neighbourhood Plan

Publicity period: 23 April to 4 June 2025

June 2025



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What is the purpose of this document?

Lowestoft Town Council submitted their Neighbourhood Plan to East Suffolk Council ahead of it being submitted for independent examination.

East Suffolk Council publicised the Plan and invited representations to be forwarded to the examiner for consideration alongside the Plan.

This document contains all representations received during the publicity period of 23 April to 4 June 2025.

Andrew Lee

I don't understand the rationale for having the boundary cut through the Parkhill estate. I live in Townsend Way and it appears that my address would form part of the Oulton neighbourhood area, where people living on the same street just a few doors away would be part of the Lowestoft area. It makes sense to me that the dividing line should be along the A12, west of the Parkhill Estate and Bentley Drive. The map used appears to be so old that the A12 doesn't appear on it heading north towards Hopton and Gorleston.

Anglian Water Services

Anglian Water Services has previously submitted comments on the pre-submission version (Reg 14) of the neighbourhood plan. We welcome those amendments made in the submission version of the neighbourhood plan, following our comments and recommended changes. However, we raise the following comments on Policy LOW17: Local Green Spaces and supporting text.

The policy designates areas of Local Green Spaces (LGS) within the neighbourhood plan area.

As outlined in our previous comments at Regulation 14 stage, Anglian Water Services has assets forming part of our water and water recycling network located within or in the vicinity of these designated areas of LGS. We welcome the removal of the Princes Walk sewage pumping station from proposed site LGS16 following our request to exclude it from the designation shown on the Proposals Map.

In general, we consider Policy LOW17 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, such as sewers, rising mains and mains water pipes, which would be consistent with the policy tests to upgrade or maintain these assets, and are generally 'permitted development'. Although there will be instances where the works could require planning permission.

Referring to the National Planning Policy Framework (NPPF) at para. 108 managing development within a LGS should be consistent with national policy for Green Belts i.e. paras. 153 – 155 of the NPPF, setting out the criteria regarding the types of development that may be appropriate in Green Belt areas.

Whilst Anglian Water Services does not wish to object to the designation of important community assets, the current policy wording is not wholly consistent with the NPPF. This approach has been clarified in the Courts. (See Court of Appeal case R on the Application of Lochailort Investments Limited v Mendip District Council. Case Number: C1/2020/0812.)

Policy LOW17 should provide the correct policy basis for decision-making if any future development was proposed on LGS and should be amended accordingly to reflect the NPPF only. The following wording is not required and should be deleted:

“2. Development should take opportunities to enhance and should not harm the accessibility, character, setting, amenity or safety of Local Green Space

3. In exceptional circumstances, small-scale development will be supported within Local Green Spaces where it directly supports the community use of the space and; a) does not harm the open and green character of the space; and b) includes positive design features to offset the loss of green space.”

In place it should read *“Development proposals within the designated local green spaces will be managed in accordance with national Green Belt policy.”*

Amendments to supporting text para. 10.44 are also required to reflect this change.

This will ensure that there is no doubt regarding the lawfulness of the policy and the restrictions on development with regard to LGS designation will continue to apply through the NPPF. The policy would then also meet the Basic Conditions.

Deborah Ray

Point 6.6 page 18 states that a flooding policy forms part of the plan, however no flooding policy exists in the current iteration of the plan.

The Lowestoft Neighbourhood Development Plan Regulation 14 Consultation Draft January 2023 included a section on Flooding and Coastal Erosion which has since been omitted. I believe this to be a grave omission as the floods of 1953 and 2013 demonstrate that parts of the town are susceptible to flooding and incidence of flooding will only increase with climate change. The postponement or cancellation of the proposed tidal barrier has increased the vulnerability of the town which will impact inward investment and economic prosperity due to the uncertainty faced by potential investors.

In the Lowestoft Neighbourhood Development Plan Support Document 1 - Statement of Consultation March 2025 several consultees including East Suffolk Council (page 68), Suffolk County Council (page 122/3) and the Environment Agency (page 138/9) state that the Plan is remiss in omitting the section on flooding and coastal erosion and consensus is that the plan is incomplete without it. Reasons provided for the omission are that the topic is covered in the Waveney Local Plan, policy WLP8.24, however, that plan does not take into account the cancellation of the tidal barrier and the specific challenges that Lowestoft faces as the largest urbanized coastal area in the UK without permanent flood defences.

As the plan covers fifteen years and predictions are that the climate will become less predictable as the average global temperature rises, it would be prudent to reinstate the section on flooding and coastal erosion to protect the future of the Lowestoft community.

East Suffolk Council

The preparation of the neighbourhood development plan for Lowestoft is supported, and it is considered that, overall, it is a well-presented plan that complements the strategy and policies contained in the East Suffolk (Waveney) Local Plan (March 2019).

The Council has had good liaison with the Neighbourhood Plan group and submitted comments during the preparation of the Plan, including in response to the Regulation 14 consultation. It is noted that some of the changes suggested as part of the Regulation 14 consultation response have been made, as set out in the Consultation Statement, but some have not. Whilst the Council does not have any 'basic conditions' objections to the submission of the Lowestoft Neighbourhood Plan, there are a number of comments on the Submission Neighbourhood Plan, which are set out below:

Section/Policy	Comments
Front Cover	This has been changed to reflect the whole of the town and is a welcome change
Foreword	This is written in the first person and reads like it should have the authors name against it. As it stands, it is not clear who has written it.
Introduction	Gull Wing Bridge (as per para 3.8 on page 8) -this bridge is now open but some context around what it is and why it is strategically important to the town could be included in the introduction.
Vision and Aims	<p>We commented at the Regulation 14 stage that we considered this section was too short and generic and this view remains.</p> <p>This section could be expanded to include some locally distinctive aspects of Lowestoft and could cover more of the elements that are outlined in the Aims. For example, more focus could be put on the natural environment and housing as key elements of this plan that have not been directly referenced in the Vision.</p>

	<p>The aims are also brief, and it feels like they could be more distinctive to Lowestoft. E.g.: Are there particular business sectors that are of importance to the town? Any benefits that could be maximized and built on as a result of infrastructure and/or regeneration projects.</p>
Page 7 - Para 3.7	<p>The wording “The Neighbourhood Development Plan Area encompasses the town’s two former Conservation Areas: North Lowestoft Heritage Action Zone and the London Road South Heritage Action Zone.” should be changed to prevent any confusion concerning the status of the North and South Lowestoft Conservation Areas and should read “the two ‘former Heritage Action Zones’.</p>
Page 8 – Para 3.8	<p>East Suffolk Council and other funding streams such as Historic England were key delivery partners in the Heritage Action Zone scheme and as such this should be referenced in the wording.</p> <p>In bullet point 2 it is mentioned that the First Light Festival is supported by the Arts Council, however this is somewhat narrow, and all other funders should be mentioned</p> <p>Bullet point 3 should state that the Town Centre Masterplan was adopted in 2020. This should also refer to the Lowestoft Seafront and High Street Heritage Action Zone Masterplan being adopted in 2022.</p> <p>This paragraph also refers to £24.9 million via the Towns Fund, however there is no mention of the projects being delivered and these should be included to give context to current investments. There should also be reference to the Levelling Up funding which has helped to finance the redevelopment of Jubilee Parade.</p> <p>Including the objectives of the Lowestoft Investment Plan would be very beneficial for this section.</p>
Page 10 - Para 3.10	<p>Reference should be made to other evidence that may have been used such as Celebrating Culture on the Edge: A New Dawn’, and East Suffolk Council’s Culture Strategy and how</p>

	they have been used in the interpretation of the associated policies.
Page 18 - Para. 6.4	The listed evidence documents are all marked 'to be updated'. It's not clear what updates are needed or why. This is confusing. As submitted documents these should be up to date. Is this wording included in error? If not, the updates to the documents should be made and the text in the plan amended accordingly.
Page 20 - para.7.4	This paragraph mentions two sites for culture and visitor-related uses, but these have not been defined in the plan as to what visitor-related uses would cover.
Page 21 - Para. 7.10	<i>"The temptation for the strategic housing sites and other key sites may be to adopt a development-at-any-cost approach, including acceptance of poor design."</i> – What is the foundation for this statement? None has been provided. Without a basis this type of statement is not very helpful. A build at all costs approach is not supported by East Suffolk. The neighbourhood plan should take an objective stance and be informed by sound evidence.
Page 24 LOW1 – East Point Pavilion	<p>This property is owned by East Suffolk Council and has recently undergone significant investment and refurbishment. Consequently, we would want to control the building, and any potential replacement should not be hindered by the Neighbourhood Plan in providing a development that may not work for the district council.</p> <p>Criterion 1 currently reads: This includes performance, display, exhibition, recreation, and other tourist and visitor-related uses. We suggest that the wording should be changed to 'for example this could include performance, display, exhibition, recreation, commercial and other tourist and visitor-related uses.' Alternatively, the list should be moved to the supporting text.</p> <p>The neighbourhood plan should acknowledge that the existing building falls within a Conservation Area and the</p>

	<p>setting of several listed buildings and structures, including the outstanding Grade II* listed Royal Norfolk and Suffolk Yacht Club. This could be included within the supporting text.</p>
<p>Page 26 LOW2 – Kirkley Waterfront Site</p>	<p>There are some matters relating to this policy and the supporting text that still need to be addressed in our view.</p> <p>The policy or the supporting text should include clear reference to local plan allocation policy WLP2.4. The supporting text should make it clear for readers that the WLP2.4 site allocation extends beyond the Lowestoft Neighbourhood Area and that policy LOW2 will apply only to the part of the allocation which falls within the Lowestoft neighbourhood area.</p> <p>The desire for public access to the waterfront is understandable and is a great principle. However, the Kirkley Waterfront SPD sets out that the waterfront that falls in the Parish of Lowestoft should be used for employment uses and allowing public access to quayside employment areas might create problems where the public and the employment operators mix. Waterfront access for the public will be more easily achieved on parts of the waterfront which are outside of the Lowestoft neighbourhood area. It is recommended that this policy is revised to add more flexibility around some of the criteria in part 2 of the policy. For example:</p> <p><i>2. Development should comply with the following development principles:</i></p> <p><i>a) There should be public access to the waterfront edge, provided through a combination of walkways, cycle ways, public spaces and high-quality landscape design <u>where feasible</u>;</i></p> <p><i>b) Spaces should be designed to encourage public and visitor use of the waterfront <u>where feasible</u>;</i></p> <p><i>c) The layout should prioritise pedestrian access to the waterfront edge <u>where feasible</u> and include clear sight-lines through the development;</i></p>

	<p><i>d) The waterfront (<u>where accessible to the public</u>) and streets and spaces should be overlooked by active frontages;</i></p> <p>The neighbourhood plan expressly supports economic growth in its vision and aims and the need for more employment opportunities comes through very strongly in the consultation results. Para. 6.2 states that the key challenges for the town are improving viability and attracting employment and economic growth. This policy should therefore support these aims and outcomes by supporting employment use in this important part of the quayside.</p> <p>The area covered by this policy includes a large part of the Brooke Marine and Jeld-Wen Mosaic County Wildlife Site and the supporting text could be updated to reflect this designation.</p>
P27 – Section 8	<p>This section does not reference the role of the Kirkley and the seafront area in how Lowestoft functions, including how it relates to the town centre. Fig. 5 shows that people think that the beach is the best thing about Lowestoft, but this is still not adequately reflected in the neighbourhood plan.</p> <p>Para 8.1 this could include re-purposing of the town centre.</p>
Page 28 - para 8.12	<p>This paragraph could be updated to expand on the Battery Green and Post-Office redevelopments and explain how these will be of benefit to the town and what they will offer (art spaces/galleries etc.)</p>
Page 30 LOW3 – Lowestoft Town Centre and Historic High Street	<p>In Criterion 2 it is stated that proposals that lead to substantial harm of a listed building will not be supported. Resistance to the demolition or alteration of listed and/or historic buildings is too inflexible and ignores the planning balance that is required.</p> <p>The town centre outline is very extensive, much greater than the town centre defined in the East Suffolk Waveney Local Plan. This encompasses, and is directly adjacent to, areas of land allocated in the Local Plan for employment uses.</p>

	<p>Criterion 3 of the policy supports residential uses on sites in and immediately adjacent to the town centre. Residential uses will not generally be compatible with employment land. As a minimum, this criterion should take account of amenity issues created by unneighbourly such as bars or other late-night establishment and employment uses. Alternatively, residential uses should not be supported on land allocated for employment uses.</p> <p>Criterion 4 -our view is that more needs to be said about the impacts of high-rise buildings in otherwise predominantly low-rise areas, particularly in terms visual impacts and amenity.</p> <p>LOW3 appears as if it is more relaxed on residential conversions outside of the primary shopping area and the policy does not discourage ground floor conversions. However, the policy does state that it supports the conversion of the upper floors and adjacent to the town centre – some clarification around this is recommended in terms of where ground floor conversions would be considered as it is not wholly clear and leaves the policy vulnerable to interpretation.</p>
Page 30 & 32	We welcome the emphasis given to heritage assets. The public consultation showed that these were valued as making the town centre of Lowestoft appealing.
Page 32 - LOW4 Kirkley District Shopping Centre	Para 8.18 we are not convinced that it would be possible or appropriate to attach conditions to ensure harmonious living conditions and avoiding conflicts between residents and nighttime economy uses. Any conditions would have to meet the six key tests as outlined in the NPPF. If these tests are met then conditions may be an appropriate form of controlling developments.
Page 34 LOW5 Historic Town Hall Regeneration	Reference to the listed town hall, its location in a Conservation Area and any resultant impact from redevelopment is an appropriate approach.

	<p>Nevertheless, this policy could be considered out of date as works are underway on the site. Therefore, this policy should be updated so as to reflect the current and immediate future of the Town Hall.</p> <p>Criterion 1 – we are still uncertain as to what is meant by enterprise space and knowledge-based businesses – this should be clarified and could be added to the supporting text.</p> <p>The land to the west of the Town Hall as mentioned in criterion 3 is owned by East Suffolk Council so this should be made clear. The policy should not restrict development on this land in the future although preference would be given to parking but there are already underutilized car parks nearby. As landowner we would recommend that the neighbourhood plan provides clarity that other uses would not be unduly restricted.</p>
Page 37 -LOW6 Residential Development	<p>In criteria a) and b) residential development is supported in town centre locations and above shops and commercial uses. The policy should ensure that these residential uses are not approved where they would experience amenity issues from unneighborly uses.</p>
Page 39 - LOW7 Former Lowestoft Hospital Site	<p>This protective policy is welcomed as it aims to safeguard the future of Lowestoft Hospital as a heritage asset of local interest and value. Any development will require significant engagement with the owner and/or developer.</p>
Page 42 para 10.10	<p>This paragraph states the Lowestoft is zero rated for CIL, however it is still possible to make bids for CIL funding from the district pot and this should be made clear.</p>
Page 45 - LOW9 Design and Character	<p>The general approach to design taken by this policy is good and is supported.</p> <p>Whilst parking is addressed in this policy, we will take any opportunity to encourage the design of parking areas to ensure that it is well integrated into its surroundings but also to take the opportunity to enhance the natural environment</p>

	<p>and to encourage natural drainage opportunities while enhancing biodiversity.</p> <p>Criterion 6 this should mention the councils Cycling and Walking Strategy. East Suffolk Cycling and Walking Strategy » East Suffolk Council</p>
Page 46 para 10.26	<p>This list is welcomed but a link to the councils Sustainable Construction SPD could be added here for completeness</p> <p>FINAL-Sustainable-Construction-SPD.pdf</p>
Page 47 - LOW10 Green Infrastructure, Urban Green Spaces and Biodiversity	<p>Criterion 1 - the final sentence could be removed as this duplicates the relevant legislation.</p> <p>Criterion 2 states that developments should be based on a masterplan, and this could be expanded to include a link to the councils Statement of Community Involvement which outlines the masterplanning process at Appendix 7. This can be helpful to establish expectations for the masterplanning phase. Statement-of-Community-Involvement.pdf</p> <p>We support and encourage the requirement for small-scale natural environment improvements such as swift boxes, hedgehog 'highways and bat and bird boxes where appropriate and is an aspiration supported by the National Design Code and this could be added to the policy (criterion 3)</p> <p>We suggest that the wording in Criterion 4 is amended to 'outside of the curtilage of existing homes, ponds and the connections between them, should be protected from development' as this will add clarity to the policy and prevent misinterpretation</p>
Page 49 LOW12 Port Development	<p>Policy wording or supporting text could be expanded to give examples of improvements or environmental impacts as this would help designers, developers and decision-makers to more effectively apply the policy.</p> <p>LOW12 covers the northern shore of Lake Lothing, as well as the outer harbour. As such it covers the same land as several Local Plan allocations: WLP2.10 (Inner Harbour Port Area),</p>

	WLP2.3 (Peto Square), WLP8.18 (New Town Centre Use Development) and WLP2.2 (Power Park). These policies should therefore be referenced.
Page 51 & 53 LOW13 North Lowestoft Conservation Area LOW14 – South Lowestoft and Kirkley Conservation Area	Both LOW13 and LOW14 are well considered Conservation policies with supportive wording, however there are some similarities and duplications. In both Low 13 and LOW14, there is some ambiguity around the term ‘rear of the footway frontages’ and what this means – how should it be interpreted? Does it mean the rear of the footpath to the front of housing/shops etc. or something different? Clarity and an explanation are needed for decision makers.
Page 53 LOW14 – South Lowestoft and Kirkley Conservation Area	In LOW14, the South Lowestoft CA could be amended to reflect the different late 19 th /early20 th C characteristics of the area such as differing architectural styles, materials palette and appearance of buildings which are generally ‘newer’ than those in the north Lowestoft CA, particularly the High Street area which has medieval origins.
Page 54 - LOW15 Local Heritage	The plan does not include a list of Non-Designated Heritage Assets, but the plan could reference East Suffolk Councils criteria for identification of NDHA’s to help identify and support buildings that are subject to planning applications and/or development. Non-designated heritage assets » East Suffolk Council
Section 10 Environment and Place	This section could also mention other green spaces in the town such as Ness Park and Kensington Gardens, both of which are owned by the town council and would offer a more rounded view of green spaces in the town. Para 10.41 this paragraph could include a link to the referenced document as it will make the plan more accessible and user-friendly. Para 10.43 states that policy LOW16 augments policy WLP8.23 of the local plan but offers no explanation of how substantial parts of this green space are protected as open

	space under Local Plan policy WLP8.23. These areas should be clearly identified in the Neighbourhood Plan.
Page 57 LOW16 Strategic Green Landscape	<p>East Suffolk owns land within the allocation for Strategic Green Space which was last in use for tourism and leisure use. This policy should allow for sensitively designed leisure or tourism development, that complements the character and openness, to reflect the established use of parts of this area. This would allow this area to continue contributing to the leisure and tourism economy of Lowestoft.</p> <p>A link (or footnote) should be added for Supporting document 3- Protecting Open Landscapes, Sports Fields and Local Green Spaces.</p>
Page 59 LOW17 Local Green Spaces	We recommended at Regulation 14, that 'exceptional circumstances' should be explained. This explanation is still needed as it will help landowners/ developers and decision makers.
Page 61 LOW18 Recreational and Sports Spaces	The supporting text makes no mention of Local Plan policies that cover open space designations WLP 8.23 Protection of Open Space
Page 62 Section 11 Transport and Movement	<p>This section (para 11.5) should mention the Gull Wing bridge which opened in 2024, and text could be updated to consider the impact of traffic movement in the town.</p> <p>There are also ongoing works to the public realm at Royal Green which will include a new active cycle hub and electric car charging points which could be referenced</p>
Page 64 - LOW19 Balanced Transport Provision	<p>Criterion 2.a) this sentence should read in accordance with the Suffolk Design Streets Guide (2022) and LTN 1/20 – the 15 and 16 appear to be footnote references that are missing</p> <p>Criterion 6) The reference to Suffolk Guidance for Parking should be updated to 2023. Additionally, this should state with a proportion of on-street parking 'where appropriate' Lowestoft is a densely developed town and development opportunities will come from changes of use and conversions</p>

	<p>which are unlikely to have their own access road and/or parking spaces and will therefore rely on the existing road network which may lack the necessary capacity for additional non-street parking.</p> <p>There is an opportunity to include references to the East Suffolk Cycling and Walking Strategy in this policy and/or supporting text</p>
Page 65 Section 12 Sustainable Energy	The sustainable energy section Chapter 12) needs some additional detail adding/clarification – it currently sets out that policy WLP8.27 in the Local Plan requires areas to be identified in Neighbourhood Plans, however in the rationale it sets out that the NP supports renewable but then only mentions Local Energy Schemes as a policy.
Page 66 - LOW20 Local Energy Schemes	Some text has been added to state what type of energy scheme is defined however further information is needed here. This information should include generation capacity and physical size of the development as this will help decision makers and developers to ascertain whether a proposal is truly a 'local' energy scheme.
General Comments	<p>The Partnership Scheme in a Conservation Area (PSiCA) should be referenced as this scheme attracts private investment to engender improvements to the appearance of the High Street through shop front restoration and enhancements.</p> <p>References to the South Lowestoft and Kirkley Conservation Area should be consistent throughout the Neighborhood Plan for clarity and certainty.</p> <p>Maps should be updated where appropriate to show the Gull Wing Bridge</p> <p>Lowestoft has an array of cultural projects that are ongoing, particularly the Battery Green cultural quarter redevelopment, which will a new community hub, and the former Post Office which is being turned into a gallery and art space. These schemes aim to address some of the challenges</p>

	<p>facing Town Centres and the way people spend their leisure time with the new uses drawing people into the Town Centre and provide a range of activities for local residents and tourists. Recognition should also be given to the projects that the Town Council are leading non such as the Town Hall project and Marina Theatre refurbishment and it would be encouraging to see these projects included more heavily in the Neighbourhood Plan to illustrate the level of investment and ensuring the future of the town and its significant and important buildings. It should also be mentioned that these are part of the Towns Fund and Levelling Up funding streams. These projects are fundamental to the future of the town and should be referenced.</p> <p>Finally, we would like to commend the Town Council on producing a well-rounded plan that aims to tackle some of the difficulties that the town faces.</p>
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Environment Agency

For the purposes of neighbourhood planning, we have assessed those authorities who have “up to date” local plans (plans adopted within the previous 5 years) as being of lower risk, and those authorities who have older plans (adopted more than 5 years ago) as being at greater risk. We aim to reduce flood risk and protect and enhance the water environment, and with consideration to the key environmental constraints within our remit, we have then tailored our approach to reviewing each neighbourhood plan accordingly.

A key principle of the planning system is to promote sustainable development. Sustainable development meets our needs for housing, employment and recreation while protecting the environment. It ensures that the right development, is built in the right place at the right time. To assist in the preparation of any document towards achieving sustainable development we have identified the key environmental issues within our remit that are relevant to this area and provide guidance on any actions you need to undertake. We also provide hyperlinks to where you can obtain further information and advice to help support your neighbourhood plan.

Environmental Constraints

We have identified that the Neighbourhood Plan Area will be affected by the following environmental constraints:

Flood Risk

We note that Section 6.6 of the draft Lowestoft Neighbourhood Development Plan dated March 2025, sets out that the policies of the plan are contained within several chapters with ‘Flooding’ being a chapter. However, it is disappointing to note that the draft plan currently does not include the chapter on ‘Flooding’ and so currently has no policies on flood risk. Lowestoft is at tidal flood risk from the North Sea and at fluvial flood risk from Kirkley Stream. Please ensure that the plan assesses all sources of flood risk.

Should any new development be sited within the floodplain they should consider our general flood risk guidance below.

All development proposals within the Flood Zone (which includes Flood Zones 2 and 3, as defined by the Environment Agency) shown on the Policies Map and Local Maps, or elsewhere involving sites of 1ha or more, must be accompanied by a Flood Risk Assessment.

Planning Practice Guidance (PPG)

The Neighbourhood Plan should apply the sequential test and use a risk-based approach to the location of development. The plan should be supported by the local Strategic Flood risk Assessment (SFRA) and should use the NPPF Planning Practice Guidance (PPG). The PPG advises how planning can take account of the risks associated with flooding and coastal change in plan-making and the planning application process. The following advice could be considered when compiling the Neighbourhood Plan to ensure potential development is sequentially sited or if at flood risk it is designed to be safe and sustainable into the future.

Sequential Approach

The sequential approach should be applied within specific sites in order to direct development to the areas of lowest flood risk. If it isn't possible to locate all of the development in Flood Zone 1, then the most vulnerable elements of the development should be located in the lowest risk parts of the site. If the whole site is at high risk (Flood Zone 3), an FRA should assess the flood characteristics across the site and direct development towards those areas where the risk is lowest.

Finished Floor Levels

We strongly advise that Proposals for 'more vulnerable' development should include floor levels set no lower than 300 mm above the level of any flooding that would occur if defences were overtopped in a fluvial 1% / tidal 0.5% flood event (including allowances for climate change). Safe refuge should also be provided above the 0.1% undefended/breach flood level (including allowances for climate change). We are likely to raise an objection where these requirements are not achieved.

We recommend 'less vulnerable' development also meets this requirement to minimize disruption and costs in a flood event. If this is not achievable then it is recommended that a place of refuge is provided above the 0.1% flood level (including allowances for climate change). Where safety is reliant on refuge it is important that the building is structurally resilient to withstand the pressures and forces (hydrostatic & hydrodynamic) associated with flood water. The LPA may need to receive supporting information and calculations to provide certainty that the buildings will be constructed to withstand these water pressures.

Safe Access

During a flood, the journey to safe, dry areas completely outside the fluvial 1% (1 in 100) / tidal 0.5% (1 in 200) AEP flood event, including allowances for climate change, should not involve crossing areas of potentially fast flowing water. Those venturing out on foot in areas where flooding exceeds 100 millimetres or so would be at risk from a wide range of hazards, including, for example; unmarked drops, or access chambers where the cover has been swept away. Safe access and egress routes should be assessed in accordance with the guidance document [‘FD2320 \(Flood Risk Assessment Guidance for New Developments\)’](#). We would recommend that you refer your SFRA which has produced hazard maps following a breach/overtopping of the defences?

Emergency Flood Plan

Where safe access cannot be achieved, or if the development would be at residual risk of flooding in a breach, an emergency flood plan that deals with matters of evacuation and refuge should demonstrate that people will not be exposed to flood hazards. As stated above refuge should ideally be located 300mm above the 0.1% AEP flood level including allowances for climate change. An emergency flood plan should be submitted as part of an FRA for any new development, and it will be important to ensure emergency planning considerations and requirements are used to inform it.

Flood Resilience / Resistance Measures

To minimise the disruption and cost implications of a flood event we encourage development to incorporate flood resilience/resistance measures up to the extreme 0.1% AEP climate change flood level. Information on preparing property for flooding can be found in the documents [‘Improving the Flood performance of new buildings’](#) and [‘Prepare your property for flooding’](#).

Increases in Built Footprint (excluding open coast situations)

When developing in areas at risk of flooding consideration should be given to preventing the loss of floodplain storage. Any increase in built footprint within the 1% AEP, including allowances for climate change, flood extent will need to be directly compensated for to prevent a loss of floodplain storage. If there are no available areas for compensation above the design flood level and compensation will not be possible then a calculation of the offsite flood risk impacts will need to be undertaken. If this shows significant offsite impacts, then no increases in built footprint will be allowed. Further guidance on the provision of compensatory flood storage is provided in section A3.3.10 of the CIRIA document C624.

Climate Change

The Environment Agency guidance 'Flood risk assessments: climate change allowances' should be used to inform the spatial distribution of growth and the requirements of Flood Risk Assessments (FRA) for individual applications.

The National Planning Practice Guidance provides advice on what is considered to be the [lifetime of the development in the context of flood risk and coastal change](https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances). The 'Flood risk assessments: climate change allowances' guidance provides allowances for future sea level rise, wave height and wind speed to help planners, developers and their advisors to understand likely impact of climate change on coastal flood risk. It also provides peak river flow and peak rainfall intensity allowances to help planners understand likely impact of climate change on river and surface water flood risk. For some development types and locations, it is important to assess a range of risk using more than one allowance. Please refer to this guidance. <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>. This advice updates previous climate change allowances to support NPPF and may result in flood extents being greater than they have been in the past. This does not mean out flood map for planning has changed, as these maps do not consider climate change, but fluvial flood maps that may have been produced as part of SFRAs and other flood risk studies may be out of date. FRAs submitted in support of new development will need to consider the latest climate change allowances.

Environmental Permit for Flood Risk Activities

An environmental permit for flood risk activities may be required for work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert.

Application forms and further information can be found at:

<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. Anyone carrying out these activities without a permit where one is required, is breaking the law. The Neighbourhood Plan should consider this if they decide on allocating any development sites adjacent to a 'main river'. A permit may be required, and restrictions imposed upon the work as a result in order to ensure the development does not have a detrimental impact upon the environment and flood risk.

Water Resources

Being in one of the driest areas of the country, our environment has come under significant pressure from potable water demand. New developments should make a significant

contribution towards reducing water demand and mitigate against the risk of deterioration to our rivers, groundwater and habitats from groundwater abstraction. We recommend you check the capacity of available water supplies with the water company, in line with the emerging 2024 Water Resources Management Plan which is due to be published in 2023. The Local Planning Authorities Water Cycle Study and Local Plan may indicate constraints in water supply and provide recommendations for phasing of development to tie in with new alternative strategic supplies.

New development should as a minimum meet the highest levels of water efficiency standards, as per the policies in the adopted Local Plan. In most cases development will be expected to achieve 110 litres per person per day as set out in the Building Regulations &c. (Amendment) Regulations 2015. However, a higher standard of water efficiency (e.g. 85 l/p/d) should be considered, looking at all options including rainwater harvesting and greywater systems. Using the water efficiency calculator in Part G of the Building Regulations enables you to calculate the devices and fittings required to ensure a home is built to the right specifications to meet the 110 l/p/d requirement. We recommend all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

Developments that require their own abstraction where it will exceed 20 cubic metres per day from a surface water source (river, stream) or from underground strata (via borehole or well) will require an abstraction licence under the terms of the Water Resources Act 1991. There is no guarantee that a licence will be granted as this is dependent on available water resources and existing protected rights. The relevant abstraction licencing strategy for your area provides information on water availability and licencing policy at Abstraction licencing strategies (CAMS process) - GOV.UK (www.gov.uk).

Informatives

We encourage you to seek ways in which your neighbourhood plan can improve the local environment. For your information, together with Natural England, Historic England and Forestry Commission, we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: [How to consider the environment in Neighbourhood plans - Locality Neighbourhood Planning](#)

Source Protection Zones

Your plan includes areas which are located on Source Protection Zones. These should be considered within your plan if growth or development is proposed here. The relevance of the designation and the potential implication upon development proposals should be considered with reference to our Groundwater Protection guidance:

<https://www.gov.uk/government/collections/groundwater-protection>

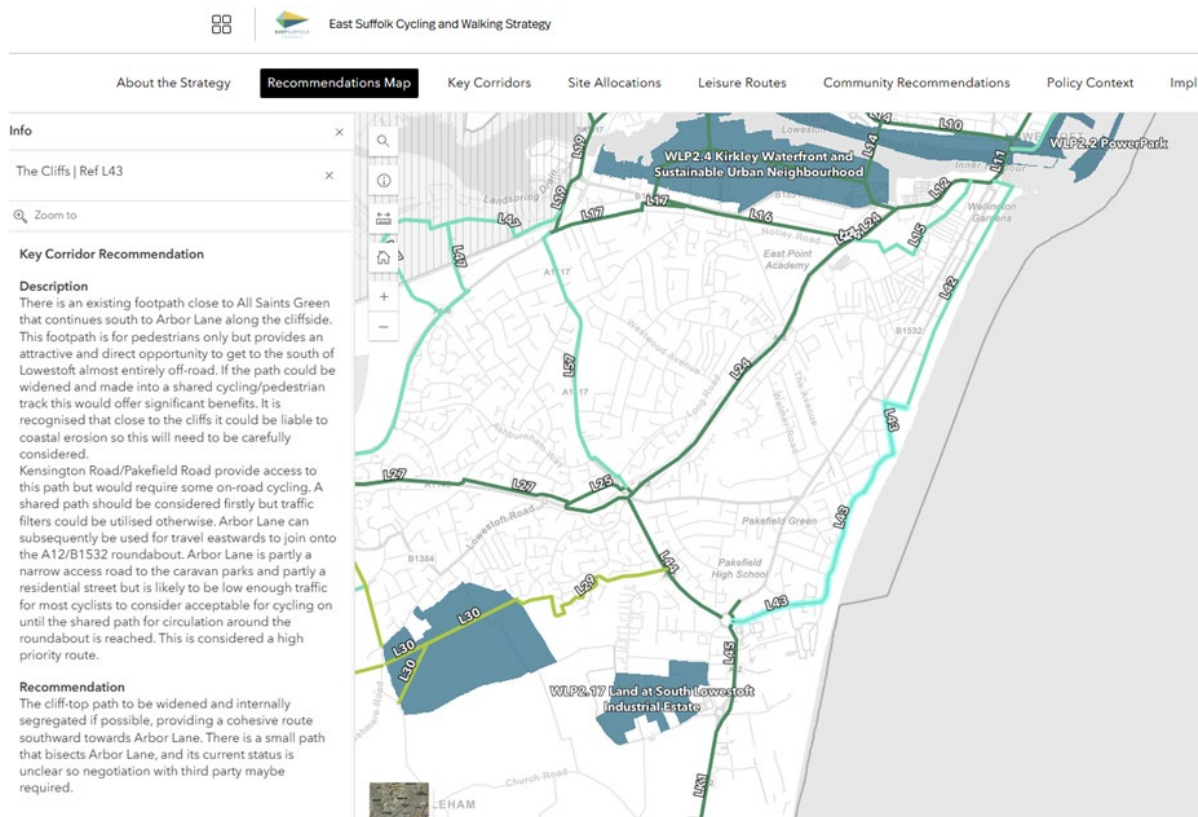
George Redpath

In this section it states that cycling is a key mode of transport through the town, which is exactly that stated in the East Suffolk Council's Cycling & Walking Strategy (2022). What has happened on the ground in Lowestoft since 2022 with regard to cycling, I can summarise and state the square root of nothing.

In fact a major retrograde step has quietly emerged and I refer to the attached excerpt from the East Suffolk cycling strategy, a key corridor recommendation is route L43 from Arbor Lane along the cliff top to the Jolly Sailors public house. This month May-25, a posse of council workers descended and painted in large lettering along the cliff top NO CYCLING, how mad is that? Where for god's sake do you expect cyclists especially school children to and from the two Pakfield schools to cycle, along the busy arterial route which is London Rd, it's madness :(

This just typifies how dysfunctional and out of touch local and regional councils are when this madness takes place.

This is a major cycling route along the cliff top as stated in the strategy, so please remove the NO CYCLING madness and let's get as many people in Lowestoft and encourage them into cycling, but unfortunately NO CYCLING signs across a scenic cliff top path will not help.



Historic England

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Development Plan.

Having reviewed the plan we do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found

here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

We would be grateful if you would notify us

on eastplanningpolicy@historicengland.org.uk if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Kate Stott

The September 2022 draft plan included a chapter and related policy on flooding but neither of these are present in this final draft, although reference to them still exists on page 18 (paragraph 6.6).

Why is there no mention of flooding within the Plan? In light of the effects of the on-going climate crisis and in particular the associated increased probability of high-impact heavy rainfall and sea level rises affecting our town, the absence of a chapter on flooding and coastal erosion strikes me as a grave oversight. The damage caused by the 2013 tidal surge on both domestic and commercial properties in the town centre shows how real these risks are.

The likelihood of fluvial and tidal flooding along the Kirkley Stream and in the Lake Lothing area respectively are significant factors affecting the sustainable development of key areas of the town centre. Add to this that the tidal barrier project, a previously agreed critical element of Lowestoft Flood Protection Scheme, was scrapped in early 2024, it makes it even more important that any development is required to take account of these externalities. The particular nature of the risks and remedies specific to Lowestoft should form a part of the Neighbourhood Plan.

This is not just my view but is supported by public bodies including East Suffolk Council, Suffolk County Council and the Environment Agency as noted in the Lowestoft Consultation Statement.

Margaret Parsons

Lowestoft Neighbourhood Plan NP which is a plan for Lowestoft Town.

Tidal barrier flood defences which started now cancelled and incomplete and now Nothing.
the chapter in the neighbourhood plan has title? Flood protection?

so the risk assessment? Nothing?

no documents to which all this evidence and need of neighbour hood plan to read and see?

insurances of business and property not needed? as no consideration with the risks of
flooding to people living in the neighbourhood of Lowestoft Town. No warning of floods
needed for anyone?

Future plans? for the protection from flooding in the neighbourhood of the town of
Lowestoft?.

main coastal town Lowestoft vulnerable to flooding twice flooded lost of life 1953 and
properties 2013

the evidence of which is well documented. Media, Government and Councils aware of the
situation of reporting and surveying the damage caused by the sea. Legal obligation for
health and safety. Risk to life etc

Future plan then is to not have in the plan?

So the Future of Lowestoft Town coastal and vulnerable to sea flooding continues without
flood protection.

Natural England

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#) .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental

assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, [National Parks \(England\)](#), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#) .

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁴ website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework--2)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).
- Planting additional street trees.

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore)

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

Norfolk and Waveney Integrated Care System

Introduction

Thank you for consulting the Norfolk and Waveney Integrated Care System (ICS) strategic estates workstream on the neighbourhood development plan. The following comments are on behalf of the Norfolk and Waveney ICS, incorporating Norfolk & Waveney Integrated Care Board (ICB), Norfolk Community Health and Care (NCHC), East Coast Community Health and Care (ECCH), The James Paget Hospital NHS Foundation Trust, and Norfolk and Suffolk NHS Foundation Trust.

Existing Healthcare Position Proximate to the Proposed Development Plan Area

The local Primary Care Network (PCN) that covers the health needs of the Lowestoft Neighbourhood area residents, is the Lowestoft PCN, this is a collaboration between primary, secondary, community, social, voluntary, and mental health care providers to form an integrated health and social care service to patients.

Alongside the service providers listed in the introduction, and in terms of physical infrastructure local to the Lowestoft NP residents, Andaman Surgery, Alexandra and Crestview Surgery (Alexandra), Alexandra and Crestview Surgery (Crestview), Highstreet Surgery and Kirkley Mill Health Centre are the GP practices with catchments covering the plan area.

Demand and capacity data indicates that 3 of the 5 GP practices listed above are currently in floorspace deficit for the number of registered patients, 2 are not. However, when looking at capacity as a whole the 5 GP practices provide an overall deficit 56.6 m² of floorspace across the Lowestoft neighbourhood plan area.

It is the choice of the resident as to where they register and any further housing growth could potentially add to the already constrained surgeries.

Review and Assessment of the Proposed Development Plan

Vision Statement - The Lowestoft NP seeks to secure sustainable and high-quality regeneration and economic development, realising the towns potential as an attractive place to live, work, visit and invest. One of the aims of the plan is to create sustainable communities supported by a range of community facilities and housing to meet local needs.

The adopted East Suffolk Local Plan has 3 site allocations for housing within the Lowestoft neighbourhood plan boundary. These 3 sites equate to a total of circa 1400 dwellings. The new residents to these dwellings would likely register at their nearest GP Practice.

Any further registrations at GP practices that are already constrained will place more pressure on them and this would become unsustainable and potentially impact demand and capacity further, especially when taking into account any future housing growth outside of the neighbourhood plan area but still within the catchment of those GP practices. An example of this is the North of Lowestoft Garden village, which sits outside of the Lowestoft neighbourhood plan area, however the population increase will impact GP practices within the boundary such as Alexandra and Crestview Surgeries and High Street Surgery.

The ICS recognise the addition of Policy LOW11 in this revised Reg 16 draft following comments made by the ICB in the Reg 14 consultation.

With the addition of proposed new developments planned in Lowestoft and other developments around the area in the near future, capacity issues do have potential to arise. The PCN are looking at ways to better integrate the community teams with Primary care provision to allow care closer to home, however this will require the physical space within local GP practices to run these services from.

Conclusion

The ICS welcomes the Lowestoft Parish Councils support in ensuring suitable and sustainable provision of healthcare services across all health sectors for the residents in the plan area, through the utilisation of local CIL (community infrastructure levy) developer contributions as and when improvements to healthcare capacity are required.

The ICS strategic estates team will continue to work with local authority colleagues to highlight constraint and identify options that will expand healthcare estate infrastructure in the area, as a means of mitigating population growth from housing developments and satisfactorily addressing the issues raised in this response.

Paul Johnston

You mention flooding policy in the Lowestoft Neighbourhood Development Plan Regulation 16 Consultation Draft March 2025, 6.6, yet there is no further mention of flooding policy.

Lowestoft is a seaside town with history of flooding and has a rising risk of flooding. As I understand it, Lowestoft is the largest seaside town in the UK without permanent flood defences.

It does not make any sense to me as to why you are not mentioning the flood risk, especially as the flood barrier has not materialised. There needs to be reference to the fact that there is not a barrier, and it doesn't look like a barrier will happen in the near future.

It follows that because there is no barrier there should be a statement setting out how planning applications, for example, should be assessed.

As it stands, any person looking at this plan would assume that there is not a flood risk, which is clearly not the case.

Richard Chilvers

The cancellation of the 2nd stage of the Lowestoft Barrier Project was originally promoted as a critical national infrastructure project as this town and docks does not have permanent flood defences even though it was severely impacted in 1953 and 2013.. I suggest this puts the short term interest of Lowestoft dock owners and the Sizewell C project before protecting Lowestoft even though central government has financially approved by rushing through changes to the Kessingland levels with new pumping stations, sea outflows to protect the A12 from catastrophic flooding.

Documentation in support of the Kessingland project is predictive of future flooding incidence within a time scale of just a few years. I enclose an East Suffolk Council document as an attachment which shows that the present owners of the docks namely ABP has determined a very constrained construction window which not only requires winter construction over a six year period and as a result escalates the costs according to the enclosed which would add 35 million if the barrier was to be started in 2028. This document also shows that the failure to construct the barrier compromises not just the Kirkley waterfront and the recently built Gull Wing bridge



Lowestoft Tidal Barrier Briefing

Introduction

Lowestoft is at significant risk of climate change impacts. Prior to the Lowestoft Flood Protection scheme, Lowestoft was the only UK town of its size without any formal tidal flood defences, which led to significant flooding of homes, businesses and critical infrastructure in the 2013 East Coast Tidal surge.

The full solution would be a tidal flood wall and barrier project to drastically reduce flood risk to 1500 homes and 850 businesses in the face of increasing sea level rise. This will create a resilient coastal hub for those that live work and visit Lowestoft and provide considerable reassurance for investors in a burgeoning and strategically important location.

Lowestoft spearheads the offshore energy sector in the southern North Sea and is an emerging hub to support the Sizewell C Nuclear development. With £122 billion of investment across the East of England, huge financial resources will help the town grow the green energy sector and support the UK's net zero carbon emissions target. Scottish Power Renewables have recently announced their intention to make Lowestoft their UK base for offshore renewables.

East Suffolk Council led the project, with partners, to this point, delivering the Flood Walls and progressing the Transport Works Act Order for a Barrier.

Costs and Timescales

If funding were to become available immediately, the proposed tidal barrier would cost a minimum of £265 million. If work on the tidal barrier design and consenting resumed immediately the earliest construction would begin in autumn 2028. Construction would potentially last six winters with completion in spring 2034. These costs and timings assume the worst-case scenario that the harbour authority, operated by ABP, requires a constrained construction window of winter working only. This constraint adds approximately £35 million to the costs and two years to the construction programme.

Financial Implications

At present, 482 homes and 373 commercial properties are situated in the tidal flood zone in Lowestoft. With sea level rise, this increases to 1,485 homes and 936 commercial premises at risk of flooding. There are key brownfield sites in the flood zone ideally placed for redevelopment. However, the land remains derelict, in part, due to the scale of investment required at site-level to address the flood risk.

The new Gull Wing bridge is vital for the connectivity of Lowestoft. Without the tidal barrier, access roads to the bridge will remain vulnerable to flooding and its full benefits cannot be realised.





The proposed tidal barrier would have made 10,900 jobs more resilient, generated 3,500 additional direct jobs locally and 8,800 indirect and induced jobs nationally.

Current Status

In 2016 the Council acquired 1400 metres of temporary barriers. These temporary defences are temporary rather than a permanent solution. The defences have been realigned to work in conjunction with the new tidal flood walls and demountable defences to provide some protection to the most vulnerable areas of Lowestoft. A new deployment plan has been produced for this.

The temporary defences are coming towards the end of their design life. Due to the nature of the temporary defence, there have been cases elsewhere where similar defences have been deployed and the defence has been moved by incoming water, causing flooding as a result. A review is taking place to see if Coastal Partnership East (CPE) need to strengthen the temporary defences at any critical locations.

In 2025 a joint study will be completed by CPE, the Environment Agency and Suffolk County Council to investigate a long-term solution. Previous options appraisals identified the tidal flood walls and barrier scheme as the preferred solution for Lowestoft tidal flood risk and construction of a tidal barrier remains the ultimate aim of the scheme.



Robin de Brea

There is no mention anywhere of the terrible consequences on Lowestoft of climate change and the effect of the tidal barrier plan being dropped. I live in a house that will become "medium" flood risk in 2036, according to the government flood risk map. I understand that the cost of a single flood similar to the one that affected Lowestoft in 2013 could be as much as £184 million, when the cost of the tidal barrier would be £124 million. The tidal barrier makes unbelievable sense. The neighbourhood plan should place flood protection as a banner headline over everything else as, without it, everything else will be thrown into disarray. Lowestoft deserves better and the neighbourhood plan appears to be blinkered. This has to change!

Statuslist Ltd (Pegasus Group)

I write on behalf of my client, Statuslist Ltd, in response to the current Lowestoft Neighbourhood Plan Regulation 16 consultation, and in respect of my client's interests at the Former Jeld Wen Factory Site to the north of Waveney Drive, as shown indicatively in Figure 1 below, which falls within the Lowestoft Neighbourhood Plan boundary.

Figure 1 Statuslist's land interests at Land North of Waveney Drive (red shaded) shown within the Lowestoft Town Council administrative boundary (red outline)

Map not included due to copyright

Statuslist are broadly supportive of the themes expressed within the draft Plan. The purpose of these representations is to respond to the updated plan, including the emerging vision, objectives, and policies, and to reaffirm the commitment to and deliverability of the Former Jeld Wen Factory site to provide positive transformational change to this key previously developed (brownfield) site, to create a new vibrant and inclusive community within a high-quality environment.

Vision and Aims

The vision and overall planning strategy for the Neighbourhood Plan, as set out in Paragraph 2.1 (vision) and 2.2 (Aims) are supported in principle. Both are considered to be aspirational and deliverable, striking a balance between recognising that new development is needed to meet the diverse needs of the community, whilst ensuring that development is sustainable and respectful of the character and heritage of Lowestoft. The vision and objectives proposed should help to deliver tangible economic, social, and environmental benefits for Lowestoft, which is to be commended.

Indeed, the vision and aims align with Statuslist's aspirations to deliver high-quality, sustainably designed and constructed new neighbourhood at Kirkley Waterfront. The scheme will seek to deliver a range of new housing and employment to meet identified local needs, alongside high-quality green infrastructure enhancements.

Residential Development

The draft Plan refers to adopted Local Plan allocation WLP2.4 *Kirkley Waterfront and Sustainable Urban Neighbourhood*, part of which falls within the Lowestoft Neighbourhood Plan area. Supporting text at paragraph 7.7 recognises the strategic importance of the Kirkley Waterfront site and reaffirms support in the Neighbourhood Plan to help shape the forthcoming development and ensure it is sustainable, high quality and appropriate for the waterfront location.

Paragraph 7.9 further recognises the importance of making efficient use of land within the Neighbourhood Plan area to accommodate Lowestoft's growth aspirations.

The Town Council's recognition of the importance of the site and the need to make efficient use of land for regeneration is supported by Statuslist.

It is noted that Paragraph 7.12 states that the policies in the Neighbourhood Plan for the Kirkley Waterfront should be read alongside Local Plan Policy WLP2.4 and the Development Brief Sustainable Urban Neighbourhood and Kirkley Waterfront Development Brief Supplementary Planning Document (SPD, 2013). However, it is considered that the SPD is now significantly out-of-date, as recognised by East Suffolk Council's efforts to prepare the emerging Kirkley Waterfront Planning Position Statement (PPS) (April 2025) which seeks to update the objectives and priorities for the Kirkley Waterfront to reflect the up-to-date position, constraints and opportunities at the allocation. The paragraph should be amended to include reference to "*or successor documents*" consistent with wording of Policy LOW2.

Policy LOW2 – Kirkley Waterfront Site

Policy LOW2 is supported in principle. There is a clear focus upon creating a high-quality urban waterfront, including both residential and employment uses which is in line with Statuslist's vision for the site.

In terms of specific requirements outlined for the site in Part 2 of LOW2, it is considered that greater flexibility in policy wording would be advantageous to ensure that the scheme remains viable and can come forward in a timely manner.

Whilst the development principles outlined within LOW2 are agreeable in principle, recognition of the highly constrained nature of the site is required. Flexibility should be introduced across the policy to recognise the constraints of the site and to allow Statuslist to bring the site back into productive use without delay.

Statuslist will prioritise high-quality design and layout, however the site constraints require a degree of flexibility to ensure that the scheme remains achievable. An amendment to the

policy wording to amend Part 2 to read “*Development should, wherever possible and unless justified, comply with the following development principles*” would be fully supported.

In light of the above, public access to the waterfront edge, as envisaged in 2(a) is not practicable given the inherent conflicts between public access and the primary objective of utilising the quayside for proposed employment use. It is envisaged that appropriate public access can be provided to the waterfront on the adjoining Brooke Peninsula and/or Riverside areas of the wider allocation to the west and east of the Former Jeld Wen Factory site respectively and linked via an appropriate Green Infrastructure and/or movement network through the Jeld Wen site. But it is important to recognise that public access to the waterfront within the Former Jeld Wen Factory site part of the wider allocation is not possible.

The masterplanning of the site will ensure attractive vistas and views of the waterfront are provided through the site, whilst ensuring the employment uses on the quayside can remain commercially attractive to operators and ecology interests are also protected. It is proposed that amended wording be inserted into Policy LOW2 to read “*2 (a) Where possible and practicable, there should be public access to the waterfront edge...*”. This revised wording would remain compatible with part (b) whereby spaces are to be designed to encourage public and visitor use of the waterfront within appropriate parts of the allocation.

Likewise, part (c) is supported in principle. Every effort will be made to ensure attractive vistas of the waterfront are provided. The Illustrative Masterplan submitted with the outline planning application (ref: DC/24/2381/OUT) demonstrates that clear sightlines can be provided along the proposed ‘Green Streets’ running north-to-south through the site in recognition of the value that blue (and green) infrastructure can have in enhancing the quality and legibility of development.

In terms of part (d) the provision of active frontages overlooking areas of public space is supported. Active frontages will be prioritised wherever possible throughout the scheme to ensure a safe environment for new residents and users.

Parts (e) and (f) are supported in full. It is Statuslist’s intention to create a high-quality scheme, influenced by the waterfront context and industrial heritage of the site.

Supporting text at paragraph 7.19 confirms that the aim of the policy is to achieve exemplar design and create a positive symbol of the transformation of Lowestoft. The text goes on to confirm that the key to compliance with LOW2 is the creation of a new neighbourhood with an accessible and vibrant waterfront. Both of these supporting statements are wholly supported, and the ambition for the site is shared by Statuslist, with acknowledgement that

public access to the waterfront is not deliverable within the Former Jeld Wen Factory site parcel.

LOW8: Residential Mix and Standards

Policy LOW8 is supported.

In respect of Part 1 of LOW8 it is the intention to deliver a scheme which provides a range of housing types and tenures to ensure a choice of residential accommodation and to create a mixed and balanced community. Flexibility will inevitably be required to ensure that a viable scheme can come forward to deliver these significant benefits.

The wording of Part 3 of LOW8 in relation to Affordable Housing is supported whereby provision is triggered “*where there is an affordable housing requirement*”. The submitted outline planning application (DC/24/2381/OUT) has been subject to independent viability review by ESC which confirms the Former Jeld Wen Factory Site yields a deficit against the viability benchmark. Accordingly, the scheme is unable to support Affordable Housing (and is not required to in any event due to the exemptions associated with Vacant Building Credit). The wording of LOW8 is therefore supported.

Part 4 of LOW8 requires developments to meet or exceed national space standards, which is supported where feasible.

Part 5 of LOW8 seeks positive design and landscape features to reduce carbon impact and promote biodiversity. As demonstrated within the submitted outline planning application, the Former Jeld Wen Factory site incorporates significant strategic green infrastructure and amenity space, including tree-lined streets; formal and informal play; and protection for existing, and creation of new habitats for wildlife.

LOW19 – Balanced Transport Provision

Land North of Waveney Drive (Former Jeld Wen Factory site) is sustainably located within walking and cycling distance of key amenities in Lowestoft, including public transport, health services, schools, and employment.

Statuslist supports the aim of Policy LOW19 of reducing the impact of development upon the local road network. Accordingly, the submitted outline planning application (ref: DC/24/2381/OUT) is accompanied by a Travel Plan to identify measures to encourage the use of sustainable modes of travel.

Concluding Remarks

Lowestoft is already an attractive place to live and work, and Statuslist supports the Neighbourhood Plan where it seeks to strike the right balance of recognising the importance of future growth and ensuring that this is delivered in a high-quality and aspirational manner to ensure that development reflects and enhances the local character and context. The Former Jeld Wen Factory site represents an exciting opportunity to contribute towards borough-wide housing needs in a sustainable, mixed use and high-quality development that complements and enhances the character of the Kirkley Waterfront area.

It is considered that subject to the proposed amendments above, that the Neighbourhood Plan will accord with Basic Condition 1 (Conformity with National Planning Policy); Basic Condition 4 (Contribution to Sustainable Development); and Basic Condition 5 (General Conformity with the Strategic Policies of the Development Plan), as required by the regulations when examining Neighbourhood Plans.

Statuslist has recently submitted updated proposals at the Former Jeld Wen Factory Site under outline planning application DC/24/2381/OUT. The updated proposals have evolved in response to the technical consultees and changing objectives for the allocation as identified within the emerging Kirkley Waterfront PPS and represent an exemplar regeneration opportunity which will act as a catalyst for the positive transformational change of the Kirkley Waterfront and wider town. It is essential that the emerging Neighbourhood Plan reflects and supports the deliverable opportunity at the site as submitted to ESC.

The above representations seek to demonstrate Statuslist's commitment to delivering on the needs of the local community, and I trust these comments will be considered in the preparation of the Neighbourhood Plan. Statuslist would welcome further engagement and should ESC or the Neighbourhood Plan committee / Town Council have any queries in relation to the above, then please do not hesitate to contact me.

Suffolk County Council

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Lowestoft Neighbourhood Plan.

SCC welcome the changes made to the plan in response to comments made at the Reg. 14 pre-submission consultation stage.

As this is the submission draft of the Plan the County Council response will focus on matters related to the Basic Conditions the plan needs to meet to proceed to referendum. These are set out in paragraph 8(2) Schedule 4B to the Town and Country Planning Act. The basic conditions are:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan
- b) the making of the neighbourhood plan contributes to the achievement of sustainable development.
- c) the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)
- d) the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.

Archaeology

Listed Buildings

As part of the Pre-Submission consultation, SCC noted that “though there is mention of Listed buildings throughout the document, these are not discussed in any detail. The designated heritage assets form a significant part of the town’s visible heritage and as such SCC would advise, at a minimum, there should be the inclusion of a Figure showing the location of Listed buildings.” SCC provided clarification that further records are available from the Historic Environment Record (HER), and publicly available records can be seen through the Suffolk Heritage Explorer¹. It is still recommended that reference is made to the HER.

Paragraph 5 (Ref: 18a-005-20190723) of the Planning Practice Guidance explains that “The historic environment record is a useful source of information on the local historic

¹ <https://heritage.suffolk.gov.uk/>

environment. The local planning authority heritage advisers can advise on local heritage issues to be considered when preparing a neighbourhood plan.” Setting this out within the Plan would ensure that the local character and history is taken into consideration, and thus the plan would be clear and unambiguous, as per NPPF paragraph 16, part d.

SCC reiterates that the HER contains numerous records for the town, indicating activity in the area dating from the prehistoric to the modern day. Six examples were provided in the Regulation 14 response to illustrate this.

Given the above and to accord with Basic Condition A, SCC would encourage the addition of the following wording in Chapter 10 again, relating to archaeology in development sites:

“Suffolk County Council Archaeological Service manages the Historic Environment Record for the County and holds numerous records for the parish relating to historic settlement and other cultural activity. Non-designated archaeological heritage assets would be managed in development through the National Planning Policy Framework. Suffolk County Council Archaeological Service would advise that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of any future development sites at an appropriate moment in the design stage, in order that the requirements of the National Planning Policy Framework, and East Suffolk (Waveney) Local Plan are met. Suffolk County Council Archaeological Service, as advisors to East Suffolk Council would be happy, to advise on the level of archaeological assessment and appropriate stages to be undertaken.”

Minerals and Waste

In response to SCC’s response at Regulation 14 stage, in the Consultation Statement the Town Council set an action that they will “add the MWP to the list of strategies in para 3.10”. However, the Suffolk Minerals and Waste Local Plan 2020 (SMWLP) has not been added to the list. It is assumed that this is simply a minor oversight.

Footnote 17 of the NPPF states that “Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area”. SCC acknowledges that the plan is in general conformity with the SMWLP and has been mentioned to paragraph 3.4. However, because paragraph 3.10 is stated to be a list of “Key Evidence Documents used to inform this plan”, the SMWLP would fall into this category and would need to be included in this list to accord with Basic Condition A.

Natural Environment

Policy LOW10 Green Infrastructure, Urban Green Spaces and Biodiversity

At Regulation 14 stage, SCC suggested a minor amendment to Policy LOW10 in order to strengthen its interpretation in respect of biodiversity:

“1. Development should provide a measurable increase in ~~have no overall significant adverse impact on~~ biodiversity. ~~Any identified adverse impacts should be mitigated, including with positive building design and landscape features to enhance developments for wildlife. Development should achieve biodiversity net gain, which should be measured~~ using the latest DEFRA biodiversity metric available at the time of submission of the proposal for planning permission. Any identified adverse impacts that cannot be avoided or further minimised should be mitigated, including with positive building design and landscape features to enhance developments for wildlife.”

The Town Council have responded in their Consultation Statement that “These suggested changes do not seem to fit in the sections suggested” and therefore no change is required. However, SCC notes that the amendment suggested is not an addition of new information, it is a rewording of the language that the Town Council had already used. So, the reasoning given to dismiss this amendment is inaccurate.

SCC’s amendment intends to mirror the Environment Act 2021 legislation and ensure existing ponds remain connected, which should further protect their continued ecological value. The amendment also ensures language is in line with paragraph 187, part d, of the NPPF with states that policies should contribute by “minimising impacts on and providing net gains for biodiversity” rather than just requiring there to be no overall significant adverse impact at all as the policy currently suggests. This is an unrealistic and constrictive requirement.

Paragraph 193, part d, of the NPPF states that “opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity”. This also underlines the need for measurable outcomes rather than simply requiring for no overall adverse impact.

General

Consistency

Paragraph 6.4 of the plan refers to “Supporting Document 5 - Habitat Regulations Assessment Screening Response” but the supporting document uploaded on the East Suffolk Website is title “Habitat Regulation Assessment”. SCC queries if this is referring to the same document, and if so, why have they not been given the same title.

Paragraph 6.4 of the Neighbourhood Plan outlines a list of the supporting documents and shows how they will be referenced within the plan. Throughout most of the plan the documents are referred to with both their supporting document number and title. For example, paragraph 4.3 refers to “Supporting Document 1 – Statement of Consultation” and paragraph 6.3 refers to “Supporting Document 3 – Protecting Open Landscapes, Sports Fields and Local Green Spaces”.

However, paragraphs 5.12 and 10.16 do not include that the Habitat Regulation Assessment is Supporting Document 5. This reference should be updated to reflect the format used in other paragraphs.

While these are not Basic Condition matters, the above should be reviewed by the Town Council for continuity and clarity.

Suffolk Wildlife Trust

Thank you for sending Suffolk Wildlife Trust notice of the Regulation 16 Consultation for the Lowestoft Neighbourhood Plan. Our comments relate only to Wildlife Conservation, Biodiversity, and Ecology – our charitable remit.

Policy LOW8 – Residential Mix and Standards

Suffolk Wildlife Trust support Point 5 of this Policy which states, “Housing development should include positive design and landscape features to ... promote biodiversity.”

Policy LOW9 – Design and Character

Similarly, we support Point 8 of LOW9 which aims to promote biodiversity.

Policy LOW10 – Green Infrastructure, Urban Green Spaces and Biodiversity

The policy suitably shows consideration of the Mitigation Hierarchy, in line with previous Suffolk Wildlife Trust comments, and Biodiversity Net Gain. We raise no concerns over the policy and support the policy aims to protect biodiversity.

County Wildlife Sites

While policy LOW16 references County Wildlife Sites (CWSs), and many of the green spaces identified and mapped in Policy LOW17 include CWSs, specific reference and identification of CWSs in the parish should be included to fully meet the requirements put forward in National Planning Policy Framework (Para. 192)¹, as per our previous comments dated 14th November 2023

¹ Department for Levelling Up, Housing and Communities (2024) *The National Planning Policy Framework*, December 2024, (Available: <https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf>)

Use Your Voice

UseYourVoice Lowestoft wish to register a formal objection to the draft Local Neighbourhood Plan.

The current draft plan fails to address the single most important strategic challenge facing the town: flood risk. Lowestoft is now England's most vulnerable urban centre to both tidal and river flooding. The adopted Waveney Local Plan of 2019 recognises this explicitly and makes reference to a Strategic Flood Risk Assessment and a Flood Risk Management Project. The latter project is described as 'tidal flood walls and a tidal barrier' in officially published LFRMP information.

In the context of the subsequent cancellation of the tidal barrier, it is extraordinary that the draft Local Neighbourhood Plan makes no mention of this major change to the town's flood resilience strategy. Nor does the plan explore the implications of the cancellation of the barrage on allocated development sites nor how the quality, design and location of development may have to change in the context of the barrage not being delivered.

The plan contains clear errors: it states in paragraph 6.6 that it contains policy on flood risk, yet the referenced policy is not to be found in this draft.

The ESC's guidance on Local Plans includes the following:-

“The whole point of a neighbourhood plan is that it is community led. The neighbourhood planning group will need to talk to lots of people locally (residents, businesses, community groups, schools etc) to find out what is important to them about where they live, what they would like to improve and what their vision is for the local area. “

Use Your Voice 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. We believe that as currently drafted, the plan is not fit for this purpose.

Further to the risks is the Atlantic Meridional Overturning Circulation (AMOC) highlighted by Professor Dave Evans in the EDP on 3rd June 2025. “...a weakened AMOC could accelerate sea level rise along the eastern coast of the UK. For communities already concerned about erosion and storm surges this is a cause for real alarm...we need strong climate change adaptation strategies...”

We wish to see a plan that acknowledges the actual conditions that the town faces as England's most flood-vulnerable urban centre; that addresses the town's strategic needs in

the context of these conditions and that explicitly recognises and addresses the implications of the cancellation of the town's tidal barrier.