

Consultation Statement

Kirkley Waterfront Planning Position Statement

How the Council has undertaken consultation and taken views into account in preparing the Kirkley Waterfront Planning Position Statement

July 2025



Contents

1 Introduction	1
2. Who was consulted?	1
3. How were they consulted?	2
4. Landowners' Forum	5
Appendix 1: Initial Consultation Promotion Material.....	6
Appendix 2: Responses to the Initial Consultation	10
Appendix 3: Feedback from developers and landowners during production of the Kirkley Waterfront Position Statement	110
Appendix 4: Draft Consultation Promotion Material	143
Appendix 5: Responses to the Draft Planning Position Statement consultation	145

1 Introduction

The Kirkley Waterfront and Sustainable Urban Neighbourhood is a large site on the south side of Lake Lothing in Lowestoft. It is allocated for redevelopment as [Policy WLP2.4](#) in the Waveney Local Plan (2019) for approximately 1,380 new homes, a retirement community, primary school, pre-school, playing field, local retail centre, marina facilities and employment development. Some of the site has been developed, but much remains vacant or underused.

The Planning Position Statement should help bring forward development on the site by advising landowners and developers of the Council's position on recent changes and key issues affecting development. It will be used to help make decision on planning applications on the site.

The Council's approach to engagement is set out in the [Statement of Community Involvement](#)¹. Although Planning Position Statements are not covered in the Statement of Community Involvement, the general consultation methods for the preparation of Supplementary Planning Documents have been followed.

2. Who was consulted?

Consultation was split into two stages - an initial stage that sought views on what should be included in the Planning Position Statement (PPS) and a consultation that sought views on the content of the draft PPS.

Initial consultation

The initial consultation was carried out between 6th March and 3rd April 2024. The following organisations and groups were consulted:

- Landowners and developers of the key sites for redevelopment within the Kirkley Waterfront site
- Key organisations and stakeholders including
 - Associated British Ports
 - Environment Agency
 - Home Builders Federation
 - Homes England
 - Lowestoft Town Council

¹ How to get Involved in Local Planning – Statement of Community Involvement (April 2021)

- Natural England
- Oulton Broad Parish Council
- Sport England
- Suffolk County Council
- Suffolk Wildlife Trust
- Sustrans
- Town and parish councils adjoining Lowestoft and Oulton Broad parishes
- Owner/occupiers of properties within the site and immediately adjacent
- Owners of land within the Kirkley Waterfront site but outside of the key sites
- Planning agents and developers on the Local Plan mailing list
- Members of the public

Consultation on the Draft Planning Position Statement

Consultation on the Draft Planning Position Statement was carried out between 3rd April and 8th May 2025. All of the organisations, groups, and owners of land within the allocated site consulted at the initial stage (as listed above) were consulted as part of the draft consultation. All respondents to the initial consultation that requested to be notified of the publication of the draft document were informed.

3. How were they consulted?

Initial consultation

The initial consultation ran from 6th March to 3rd April 2024. The consultation material was made available on the East Suffolk Council website at: [Kirkley Waterfront - East Suffolk Council, Strategic Planning Consultations](#)

Hard copies of the document were also made available at the following locations:

- East Suffolk Council offices at Riverside and the Marina
- Lowestoft Library
- Oulton Broad Library

The consultation was advertised on the Council's website, social media platforms and through a press release (see Appendix 1). The consultation material including a questionnaire was published on the Council's website. Landowners and developers of the key sites for redevelopment, Lowestoft Town Council, Oulton Broad Parish Council, elected members and key stakeholders and organisations referred to in Section 2 were directly

notified by email/letter as their preference. A letter was sent to all 537 addressable properties within and immediately adjoining the site and the nine landowners within the site but outside of the key sites for redevelopment.

Hard copies of the consultation material was made available for inspection/collection in the Council's Riverside and Marina offices. 'Inspection copies' of the consultation material was made available in Lowestoft and Oulton Broad libraries. The consultation material was also available upon request by contacting the Planning Policy and Delivery Team.

A press article 'Views sought to 'bring forward' development on waterfront' was published in the Eastern Daily Press on 8th March 2024.

In total 60 individuals and organisations responded to the consultation. Appendix 2 provides a summary of each of the comments received, the Council's response and how responses informed the preparation of the Draft Planning Position Statement.

The full responses have been published on the Council's website at https://eastsuffolk.inconsult.uk/kirkley_waterfront_2024/consultationHome

Draft Planning Position Statement consultation

The consultation ran from 3rd April to 8th May 2025. The consultation material was made available on the East Suffolk Council website at: <https://eastsuffolk.inconsult.uk/KirkleyWaterfront2025/consultationHome>.

Hard copies of the document were also made available at the following locations:

- East Suffolk Council offices at Riverside
- Lowestoft Library
- Oulton Broad Library

The consultation was advertised on the Council's website, social media platforms and through a press release (see Appendix 4). The consultation material including supporting documents were published on the Council's website. Landowners and developers of the key sites for redevelopment, owners of other land within the site, Lowestoft Town Council, Oulton Broad Parish Council, elected members, key stakeholders and organisations, and planning agents referred to in Section 2 were directly notified.

A press article 'Lowestoft waterfront development: Local feedback call out' was published in the Eastern Daily Press on 4th April, and a follow-up article on 29th April 'Have your say on development at Kirkley Waterfront Lowestoft' in the Lowestoft Journal.

In total 40 individuals and organisations responded to the consultation. Appendix 5 provides a summary of each of the responses received, the Council's response and details of how responses resulted in changes to the Planning Position Statement. The full responses can be viewed at <https://eastsuffolk.inconsult.uk/KirkleyWaterfront2025/consultationHome>.

4. Landowners' Forum

East Suffolk Council Planning Team have worked with the main landowners of the allocated site to understand the detailed challenges facing development, the different timelines that owners have for development and to try and co-ordinate the delivery of key policy requirements across the site.

The key site owners (either representing themselves and/or with agents/consultants):

- Sanyo and Survitec sites represented by the East Suffolk Council Housing Team and their agent/consultant
- Brooke Marine site represented by their agent/consultant
- Scenic site represented by Lake Marina Properties Ltd and their agent/consultant
- Jeld Wen site owned by Statuslist and represented by their agents/consultants

The Landowners' Forum is regularly attended by representatives of the landowners, the Head of Planning and Coastal Management, East Suffolk Planning Policy officers, East Suffolk Development Management officers, and Suffolk County Council (SCC) officers including:

- Development Contributions Manager, SCC
- Head of Transport, SCC
- Principal Transport Development Planner, SCC
- Senior Planning Officer (Infrastructure), SCC

Representatives from Homes England, the Government's housing and regeneration agency, have sometimes attended forums. East Suffolk Councillors and members of the Local Plan Working Group have also had the opportunity to visit the site, as have Suffolk County Council officers.


The Landowners' Forum established that not all the key sites were being actively developed. The sites being actively developed are not all adjacent to one another and were likely to be delivered to different timescales. There was no agreement reached to distribute different planning policy requirements across the whole allocation, such as open space, play space or primary school/nursery.

The Landowners' Forum established the need for each landowner to develop their site independent of other sites within the allocation. Each site must deliver housing, open space, play areas, nursery facilities, and walking and cycling routes.

The draft Kirkley Waterfront Position Statement was discussed at the Landowners' Forum in February 2025. The comments received from landowner representatives and the Council's response are contained in Appendix 3.

Appendix 1: Initial Consultation Promotion Material

Facebook – 6 March 2024

**East Suffolk Council**
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We want your views on what should be included in a new planning document which will help bring forward development at Kirkley Waterfront in Lowestoft.

A public consultation is now open welcoming comments from local residents about what should be included in our Planning Position Statement for the Kirkley Waterfront and Sustainable Urban Neighbourhood.

Kirkley Waterfront is a large site in central Lowestoft which was identified for development in the Waveney Local Plan - some of the site has already been developed, but much remains vacant or underused.

East Suffolk Council is in the early stages of preparing a Planning Position Statement, which will provide guidance to landowners and developers on key issues affecting development.

Find out more and give your views: <https://bit.ly/3P7Rmim>

The consultation closes at 5pm on 3 April.

This consultation is separate to a recent public consultation undertaken by the owners of the Jeld Wen site on their proposed re-development plans.

Press Release – 5 March 2024

Views welcomed on Kirkley Waterfront

Posted by on 5 March 2024 | Comments

East Suffolk residents are invited to give their views on what should be included in a new planning document which will help bring forward development at Kirkley Waterfront in Lowestoft.

A public consultation is now open welcoming comments from local residents about what should be included in East Suffolk Council's Planning Position Statement for the Kirkley Waterfront and Sustainable Urban Neighbourhood.

Kirkley Waterfront is a large site in central Lowestoft which was identified for development in the Waveney Local Plan - some of the site has already been developed, but much remains vacant or underused.

East Suffolk Council is in the early stages of preparing a Planning Position Statement, which will provide guidance to landowners and developers on the Council's position on key issues affecting development. The document will be used to help make decisions on future planning applications on the site and to recognise any changes since previous guidance for the area was produced in 2013.

Cllr Kay Yule, East Suffolk's cabinet member for Planning and Coastal Management said: "It is a long-held ambition of the Council to maximise the opportunities offered by this prominent waterfront site and transform it into a vibrant community that local people can take pride in.

"Although the site was first identified for regeneration in 2009, there has been limited redevelopment to date and a Planning Position Statement will help to bring clarity to landowners, developers and important partners and help bring development forward."

Give your views on what should be included in the Position Statement

Kirkley Waterfront is the area on the south side of Lake Lothing and is a collection of mostly brownfield sites, including various former manufacturing and boat-building sites. It covers most of the south shore of Lake Lothing from Riverside Road in the east to Nelson Wharf in the west.

Following consideration of the responses, the Council will prepare a draft Planning Position Statement for public consultation in the summer. A final Planning Position Statement is expected to be adopted later this year and will be used to help make decisions on planning applications.

The consultation closes at 5pm on 3 April 2024.

This consultation is separate to a recent public consultation undertaken by the owners of the Jeld Wen site on their proposed re-development plans.

Neighbour letter dated 4 March 2024

letter content sent to 537 addressable properties within and immediately adjoining the site

Dear Owner/Occupier,

Kirkley Waterfront

Kirkley Waterfront is a large site on the south side of Lake Lothing. It is identified for development in the Waveney Local Plan (2019) for approximately 1,380 new homes, a retirement community, primary school, pre-school, playing field, local retail centre, marina facilities and employment development. Some of the site has been developed, but much remains vacant or underused. Please see the reverse of this letter for a map of the Kirkley Waterfront area.

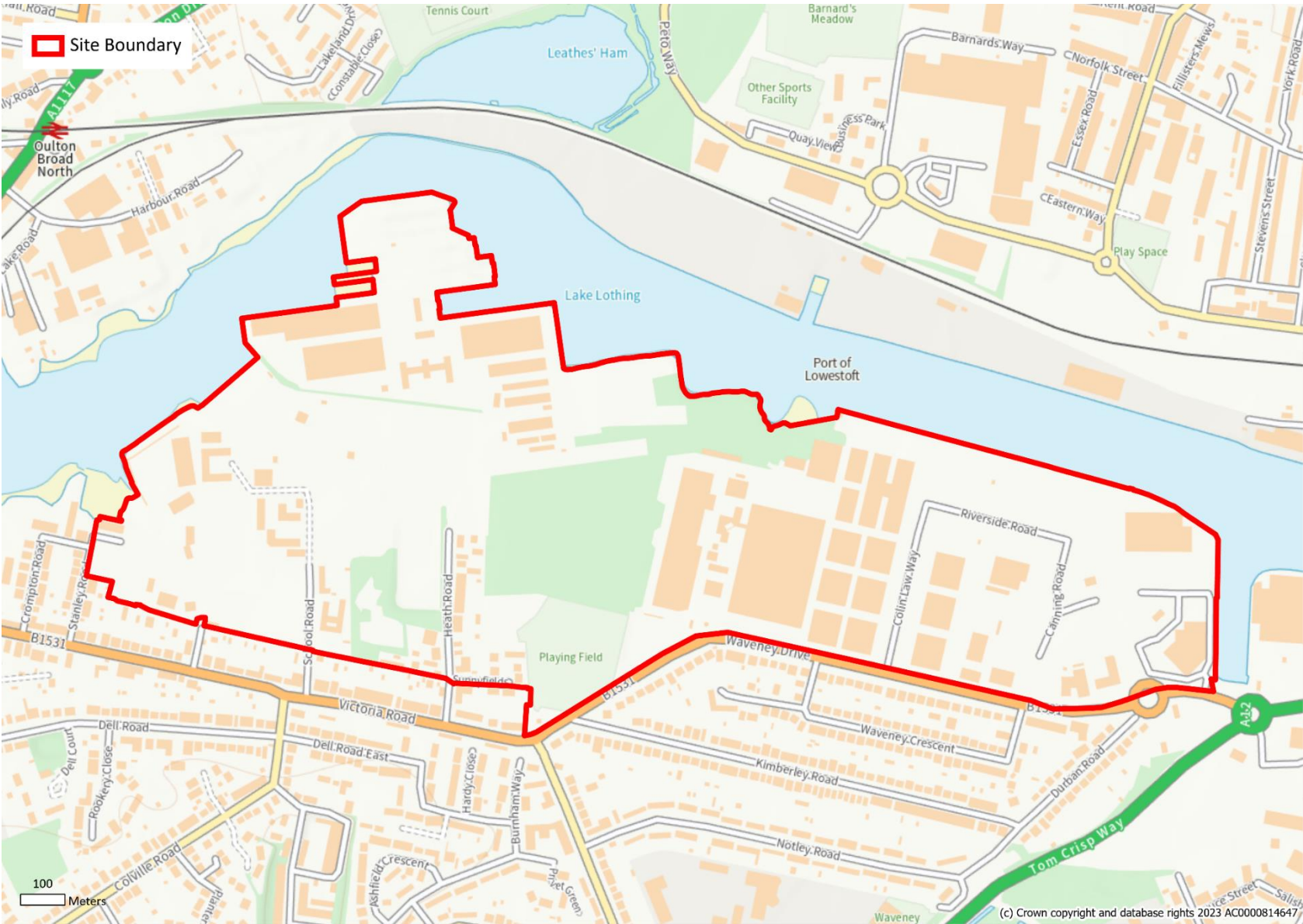
East Suffolk Council is at the early stages of preparing a Planning Position Statement for the site. The statement will aim to help bring forward development on the site by advising landowners, developers and key partners of the Council's position on key issues. This is likely to include flood risk and drainage, contaminated land, transport matters, the types and sizes of houses and various other issues. It will be used to help make decisions on planning applications in the area. The Planning Position Statement will not alter the Local Plan policy, which will remain in place.

At this early stage, we welcome your views on what should be included in the Planning Position Statement. Visit www.eastsuffolk.gov.uk/planning-policy-consultations to find out more and make a comment. Comments must be received by **5pm on Wednesday 3rd April 2024**. If you have any questions or are unable to access the consultation material online, please contact us as detailed in this letter. All comments and respondent names will be published in documents and online.

A draft Planning Position Statement will be published for public consultation in summer 2024. To be notified of this please email planningpolicy@eastsuffolk.gov.uk or write to the postal address below.

Yours faithfully

Adam Nicholls | Principal Planner
East Suffolk Council



Appendix 2: Responses to the Initial Consultation

This table summarises the main issues raised in the consultation responses, the Council's response and how they informed the preparation of the document.

The consultation questionnaire asked the following questions:

- What are the key issues that the Planning Position Statement should consider?
- Is there any new or updated evidence that should be taken into account?
- Do you have any additional comments?

The full responses can be viewed at https://eastsuffolk.inconsult.uk/kirkley_waterfront_2024/consultationHome

Name, organisation and agent	Comment Summary	Council Response	Action
Jamie Campbell, The Excelsior Trust	Need full use of water frontage for employment and leisure over housing. Kirkley Ham could be dredged and pontooned for leisure and commercial use.	The Council agrees employment and leisure facilities are important. Where possible the Council supports employment, marine and leisure uses along the waterfrontage. The Brooke Business Park has outline planning permission for residential, but the Council would support the continued employment use.	The waterfrontage of the former Jeld Wen site is to be retained as employment land. Lowestoft Beacon Marina is to be retained for marine/ leisure use.
Gregory Davis	Concerned over the site boundary in the consultation maps and potential loss of access to private property.	The Council agrees the maps should be clear and understandable. Development will not restrict access to private properties.	All the illustrations have been designed to be clearly understood.

Name, organisation and agent	Comment Summary	Council Response	Action
D. Leak	Request for new GP surgery, competitive hospitality sector, and affordable restaurants.	<p>The Position Statement cannot set new planning policies, specific requirements or targets.</p> <p>A GP surgery is not a planning policy requirement for this site. The Norfolk and Waveney Integrated Care System (formerly the Norfolk and Waveney CCG) have not requested a new GP surgery on this site or in the Waveney Local Plan area.</p> <p>A restaurant is not a planning policy requirement for this site but could be included with a local retail centre.</p>	No action taken.
Derek Reeve	<p>Request for a mixed-use development with cycling and walking along waterfront.</p> <p>Request for off-road parking and better bus service.</p>	<p>The Council agrees that walking, cycling, off road parking and access to public transport are all important.</p> <p>There are bus stops along Victoria Road and Waveney Drive, but the Council cannot require bus companies to alter their bus routes and travel into the development site.</p>	The Position Statement requires an east-west cycling, walking and wheeling route through the development.

Name, organisation and agent	Comment Summary	Council Response	Action
Nina Steer	Request for better food outlets, especially for vegan and vegetarian options.	<p>The requirements of the Waveney Local Plan policy WLP2.4 cannot be changed. Planning policy cannot specify types of restaurants provided on site.</p> <p>The Position Statement cannot set new planning policies, specific requirements or targets.</p> <p>Restaurants are not a planning policy requirement for this site but could be included within a local retail centre.</p>	No action taken.
Dominic McElnay	<p>Revitalize Lowestoft's Leisure Landscape with a riverside development similar to Norwich Riverside development adjacent to the Gull Wing bridge that includes family friendly activities such as a bowling alley, cinemas, children's play area and diverse dining etc.</p> <p>Improve accessibility and provide ample car parking. Boosting the local economy through increased footfall.</p>	<p>The Position Statement cannot set new planning policies, specific requirements or targets.</p> <p>The Waveney Local Plan policy WLP2.4 cannot be changed through the Position Statement and the policy has a strong focus on residential and employment use.</p> <p>Lowestoft is very different to Norwich, but the Council does want to see a high-quality</p>	No action taken.

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>Create a regional hub and visitors' economy.</p> <p>Make the site a vibrant destination.</p>	<p>redevelopment that meets the needs of existing nearby residents and future occupants.</p> <p>A bowling alley, cinemas, children's play area and diverse dining are not planning policy requirements, but some of these facilities could come forward as part of a local retail centre.</p>	
Mina Gourlay, Frondere Plants	<p>The respondent raises issues regarding:</p> <ul style="list-style-type: none"> • Need for traffic management with more traffic going to the new bridge and an increase in boy racers and speeding. • Concern for pollution and noise. • Need for more dentist and doctors. • Concerned about anti-social behaviours, crime. • Decaying high street. • Shortage of land and buildings for businesses. • Need more commercial properties with outdoor space, other than retail. 	<p>East Suffolk Council has commissioned a transport assessment to ensure additional traffic from proposed development can be accommodated and any issues can be mitigated.</p> <p>The Waveney Local Plan policy WLP2.4 is focused on housing delivery with 1,380 homes allocated. The Position Statement cannot set new planning policies, specific requirements or targets. However, the Council would support the retention of the Brooke Business Park as employment land.</p>	<p>Consultancy WSP was commissioned in 2024 to review the capacity of key junctions to accommodate growth and any potential mitigation measures. Their report was published in April 2025 and it informed the Position Statement.</p> <p>The Position Statement states the Council would support the retention of the employment land at Brooke Business Park.</p>

Name, organisation and agent	Comment Summary	Council Response	Action
	<ul style="list-style-type: none"> • Need strong and diversified retail rather than departmental stores. • Queries whether the focus is too much on housing over employment land. • Development is great but need to consider the impact on communities and town. 	<p>A GP surgery and dental surgery are not planning policy requirements for this site. The Norfolk and Waveney Integrated Care System (formerly the Norfolk and Waveney CCG) have not requested a new GP surgery on this site or in the Waveney Local Plan area.</p> <p>The site is allocated for a mixed use development. A high-quality redevelopment should reduce the current problems such as anti-social behaviour, crime, shortage of suitable land of businesses and need for commercial properties.</p> <p>The Council is aware high streets are struggling. This development is primarily focused on residential and employment uses. It should therefore not have a detrimental impact on the existing retail offerings nearby.</p>	

Name, organisation and agent	Comment Summary	Council Response	Action
Daniel Tyler	Need water sports and training.	<p>The Position Statement cannot set new planning policies, specific requirements or targets.</p> <p>The Waveney Local Plan policy WLP2.4 allocates the site for mixed use development with 1,380 homes, employment land and other uses, but not water sports.</p>	No action taken.
Cairolyn Crossley	Need: <ul style="list-style-type: none"> • Flood risk management. • Better social housing. • Leisure facilities. • More tourism. 	<p>The Position Statement cannot set new planning policies, specific requirements or targets. Waveney Local Plan policy WLP2.4 does not allocate tourism uses on the site. However, Lowestoft Beacon Marina is to be retained for marine/ leisure use.</p> <p>Waveney Local Plan policy WLP8.2 requires 20% of the housing delivered to be affordable housing, subject to financial viability.</p>	<p>The Position Statement has a chapter dedicated to Flood Risk Management that includes information on flood resilience and mitigation and land-raising.</p> <p>The Position Statement requirements include open space, and play areas.</p>
Jerry	Need: <ul style="list-style-type: none"> • Boat yard. • Boat building jobs. 	Lowestoft Beacon Marina is to be retained for marine/ leisure use.	The Position Statement states the Council supports the retention of the Brooke Business

Name, organisation and agent	Comment Summary	Council Response	Action
	<ul style="list-style-type: none"> • Social and affordable housing. 	The Council would support the retention of the Brooke Business Park as marine/ employment land.	Park for marine/employment use.
Keith Howard	Need a Health Centre. Provide riverside (waterfront) walkway/ cycling with links Oulton Broad and Lowestoft.	<p>A GP surgery/health centre is not a planning policy requirement for this site. The Norfolk and Waveney Integrated Care System (formerly the Norfolk and Waveney CCG) have not requested a new GP surgery on this site or in the Waveney Local Plan area.</p> <p>The Position Statement cannot set new planning policies, specific requirements or targets.</p>	The Position Statement requires an east-west cycling, walking and wheeling route through the development.
Terry Barber	<ul style="list-style-type: none"> • Please consider a temporary roundabout for site access. • Concerned about congestion especially during the construction. • Concerned about pedestrian safety and vehicular damage control. • Need a temporary roundabout, that might become permanent, at the bend in Waveney Drive, 	<p>East Suffolk Council has commissioned a transport assessment to ensure additional traffic from proposed development can be accommodated and any issues can be mitigated.</p> <p>Applicants must submit information on trees and ecological networks, and comply</p>	<p>Consultancy WSP was commissioned in 2024 to review the capacity of key junctions to accommodate growth and any potential mitigation measures. Their report was published in April 2025 and it informed the Position Statement.</p> <p>The Position Statement requires an east-west cycling, walking and</p>

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>(opposite the site entrance to the factory) for construction traffic.</p> <ul style="list-style-type: none"> Wants to see information regarding trees. 	<p>with legislation on biodiversity as part of a planning application.</p>	<p>wheeling route through the development.</p> <p>The Position Statement has a dedicated chapter on Open Space, Biodiversity and Green Infrastructure.</p>
Beryl Coleman	<p>Concerned about shortage of NHS dentists in the area.</p>	<p>A dental surgeries is not a planning policy requirements for this site.</p> <p>The Position Statement cannot set new planning policies, specific requirements or targets.</p>	<p>No action taken.</p>
Mr C P Fulford, Builder	<ul style="list-style-type: none"> Doctors' surgery not provided. How much social housing will be provided for local people? Need traffic management at Waveney Drive junction. Need to consider the environmental impact of construction on local residents. 	<p>GP surgeries are not a planning policy requirement for this site. The Norfolk and Waveney Integrated Care System (formerly the Norfolk and Waveney CCG) have not requested a new GP surgery on this site or in the Waveney Local Plan area.</p> <p>Waveney Local Plan policy WLP8.2 requires 20% of the housing delivered to be affordable housing, subject to financial viability.</p>	<p>Consultancy WSP was commissioned in 2024 to review the capacity of key junctions to accommodate growth and any potential mitigation measures. Their report was published in April 2025 and it informed the Position Statement.</p>

Name, organisation and agent	Comment Summary	Council Response	Action
		<p>East Suffolk Council has commissioned a transport assessment to ensure additional traffic from proposed development can be accommodated and any issues can be mitigated.</p> <p>The Council recognises that construction of new developments has an impact on existing residents in the area. The impact can be mitigated through Planning Conditions that restrict operational hours and require a Construction Management Plan.</p>	
Williams	<ul style="list-style-type: none"> Concerned about the destruction of wildlife habitats especially nocturnal species. Concerned about strain on existing resources and environmental impact. Suggests developing town centre instead and improving safety there. 	<p>The Kirkley Waterfront site is the largest brownfield site in the Waveney Local Plan area. It was allocated for a mixed use development in the 2019 Waveney Local Plan. Prior to this the site was allocated for development in the 2012 Lowestoft Lake Lothing & Outer Harbour Area Action Plan.</p>	<p>The Position Statement provides a chapter on Open Space, Biodiversity and Green Infrastructure that addresses wildlife issues such as Biodiversity Net Gain, the gulls and Habitat Regulation Assessments.</p>

Name, organisation and agent	Comment Summary	Council Response	Action
	<ul style="list-style-type: none"> Development will be run down in 30 years. 	<p>Waveney Local Plan policy WLP2.4 requires the development to support and enhance ecological networks and Biodiversity Net Gain legislation will also apply.</p> <p>The Position Statement cannot set new planning policies, specific requirements or targets.</p>	
Christian Newsome	Development should support existing services.	<p>A GP surgery and dental surgery are not a planning policy requirement for this site. The Norfolk and Waveney Integrated Care System (formerly the Norfolk and Waveney CCG) have not requested a new GP surgery on this site or in the Waveney Local Plan area.</p> <p>A primary school was allocated in planning policy WLP2.4 but Suffolk County Council has confirmed the additional school places are not required.</p>	The Position Statement requires a pre-school setting, open space, NEAP and LEAP (play areas) and an east-west cycling, walking and wheeling route through the development.
Steven Lambert	<ul style="list-style-type: none"> Cycle and walking route along entire harbour side. 	Lowestoft is very different to Norwich, but the Council does want to see a high-quality redevelopment that meets the	The Position Statement requires open space, NEAP and LEAP (play areas) and an east-west cycling,

Name, organisation and agent	Comment Summary	Council Response	Action
	<ul style="list-style-type: none"> • Create a retail/residential area comparable to Riverside, Norwich. • Create a central green space for socialising. • Adequate parking. • Industrial development restricted to northern shore with access off Commercial Road. • Development should be predominantly retail focused due to flood risk. Existing retailers should be encouraged to relocate here and use high streets etc for residential. • Parking on Waveney Drive and Victoria Road should be prohibited during the day. • Require public toilets and cycle parking. 	<p>needs of existing nearby residents and future occupants. Some retail and restaurant units could come forward as part of the proposed local retail centre.</p> <p>The Council agrees that adequate vehicle and cycle parking is important..</p> <p>The Waveney Local Plan policy WLP2.4 allocates the site primarily for residential, with some employment land use and a local retail centre.</p>	<p>walking and wheeling route through the development.</p> <p>The Position Statement has a chapter dedicated to Flood Risk Management that includes information on flood resilience and mitigation, and land-raising.</p>
Louise Feavours, Marine Management Organisation	The MMO is responsible for preparing marine plans for English inshore and offshore waters. Marine Plan boundaries extend up to the level of the mean high water spring tides mark and overlap with terrestrial	The information provided is appreciated.	No action taken.

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>plans which generally extend to the mean low water springs mark.</p> <p>Planning documents for areas with a coastal influence may wish to refer to the MMO's licensing requirements and relevant marine plans.</p> <p>The East Inshore and East Offshore Marine Plans and UK Marine Policy Statement (MPS) are relevant to the Position Statement. You may refer to our online guidance, Explore Marine Plans and the Planning Advisory Service soundness self-assessment checklist.</p> <p>The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the UK marine area. The MMO is responsible for marine licensing in English waters and for Northern Ireland offshore waters.</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>The marine licensing team are responsible for consenting and regulating any activity that occurs “below mean high water springs” level that would require a marine licence. These activities can range from mooring private jetties to nuclear power plants and offshore windfarms.</p> <p>The East Marine Plan was recommended to be replaced in the third 3-year monitoring review. Advise that you keep an eye on the latest updates about the future development of the Marine Plan and the policies.</p>		
Anne Millner	<ul style="list-style-type: none"> • Development of a sustainable community asset • Housing to be affordable and well designed (refers to Goldsmith Street, Norwich) • Green spaces and green waterside corridor for cycling and walking to link railway stations 	<p>Waveney Local Plan policy WLP8.2 requires 20% of the housing delivered to be affordable housing, subject to financial viability.</p> <p>Entertainment, food and retail outlets could come forwards as part of the local retail centre.</p>	<p>The Position Statement requires open space, NEAP and LEAP play areas, and an east-west cycling, walking and wheeling route through the development.</p> <p>The Position Statement has a dedicated chapter of Urban Design that includes a requirement for the design to</p>

Name, organisation and agent	Comment Summary	Council Response	Action
	<ul style="list-style-type: none"> • High quality food/retail outlets which celebrate Lowestoft and the views • Entertainment such as a cinema, facilities for young people, playground, community hub, and community garden • Development should be of highest design standard, reflecting Lowestoft's maritime history and influence of Morton Peto • Suggests wide consultations and visiting other successful developments 	The draft Position Statement will be subject to public consultation.	reflect the site's industrial and maritime history.
beverley wicks	<ul style="list-style-type: none"> • Suggests construction traffic uses Riverside Road and not School Road or Heath Road. • Maintain the trees next to the Sanyo site. 	<p>Information regarding construction traffic has been noted.</p> <p>Applicants must submit information on trees and ecological networks, and comply with legislation on biodiversity as part of a planning application.</p>	No action taken.
Steve Flatman	<ul style="list-style-type: none"> • Due to a decline in facilities south of the river, suggests leisure and recreation 	Lowestoft Beacon Marina is to be retained for marine/ leisure use.	The Position Statement requires open space, NEAP and LEAP play areas.

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>facilities for local residents and tourists.</p> <ul style="list-style-type: none"> • Riverside site is ideal location for leisure. • Parking and access. • Could help Lowestoft become a town to be proud of. 	<p>The Council agrees that adequate parking and access is important.</p>	<p>The chapter on Urban Design aims to maximise the opportunities to create a place that reflects Lowestoft's historic and maritime character, and be a place the town can be proud of.</p>
Sara Barratt	<ul style="list-style-type: none"> • Address flood risk • Minimise non-porous landscaping and include water absorbing/drainage features into design. • Retain/enhance existing scrubby plants and consider somewhere for the gulls at Jeld Wen site to nest 	<p>The information received is appreciated and has informed the Position Statement.</p>	<p>The Position Statement has a chapter dedicated to Flood Risk Management that includes information on flood resilience and mitigation and land-raising.</p> <p>The Position Statement has a dedicated chapter on Open Space, Biodiversity and Green Infrastructure that includes information on gulls.</p>
Lynn McFarlane	<p>The respondent enquires about the inclusion of GP and dental surgeries.</p>	<p>GP and dental surgeries are not planning policy requirements for this site. The Norfolk and Waveney Integrated Care System (formerly the Norfolk and Waveney CCG) have not requested a new GP surgery on this site or in the Waveney Local Plan area. There is no evidence of dental practices looking for new land/buildings in the</p>	<p>No action taken.</p>

Name, organisation and agent	Comment Summary	Council Response	Action
		Lowestoft area. A developer could propose a dental surgery within the Community Hub/retail centre, but this is not anticipated.	
Natalie Beal, Broads Authority	<p>The respondent suggested –</p> <ul style="list-style-type: none"> • Improving the foot and cycle route to Carlton Marshes along the Oulton Broad Shoreline. • Development offers a significant opportunity for enhancement at important gateway to the southern Broads. • The Content section should include historic background and maps of the site. • Should protect any non-designated heritage assets/older buildings. • Secure some historic interpretation (anything from the name of streets, design of street furniture or surfaces, or some physical 	The Council agree that the development should be a high quality design and reflect the historical context of the site.	<p>The Position Statement requires an east-west cycling, walking and wheeling route through the development.</p> <p>The Position Statement has a dedicated chapter of Urban Design that includes a requirement for the design to reflect the site’s industrial and maritime history.</p>

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>educational panels etc) to retain a sense of place.</p> <ul style="list-style-type: none"> • Include historic context/ protection of heritage as an objective in part 3. • More emphasis on aesthetics of design. • Secure the use of high-quality materials. • Proposals for improved permeability, especially along the waterfront, should be retained. • Retain some maritime/ industrial character. 		
Elsie Nunn, UK Power Networks	<p>Development is near a substation.</p> <p>Applicant must comply with the Party Wall etc. Act 1996 and is responsible for any costs associated with any appropriate measures required. Any Party Wall Notice should be served on UK Power Network's (London address provided).</p>	<p>The information provided is appreciated and will be useful at the planning application stage of the development.</p>	<p>No action taken.</p>

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>UK Power Networks have engineering guidelines regarding the design and distance of dwellings of two or more stories from substations and provided details.</p> <p>Transformers emit a low-level hum which can cause annoyance to nearby properties. Vibration from transformers can be transmitted through the ground to adjacent buildings. Little can be done to alleviate problems after the event. UK Power Network provided advice on distance and design of buildings near substations.</p> <p>24 hour vehicle access required to substations. If there is going to be any impact on access contact UK Power Network (Bury St Edmund address provided).</p> <p>There are underground cables on the site associated with the substation. Prior to</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>commencement of work accurate records should be obtained from UK Power Networks (Ipswich address provided).</p> <p>All works should be undertaken with due regard to Health & Safety Guidance notes HS(G)47 Avoiding Danger from Underground services. This document is available from local HSE offices.</p> <p>Should any diversion works be necessary then enquiries should be made to UK Power Network's Customer Connections department.</p>		
Angela Kempen, Suffolk Fire and Rescue Service	<p>Suffolk Fire & Rescue Service (SFRS) do not envisage additional service provision will be needed.</p> <p>SFRS encourage the provision of automated fire suppression sprinkler systems in any new development.</p>	The information provided is appreciated and will be useful at the planning application stage of the development.	No action taken.

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>SFRS will not have any objection with regard access that is in accordance with building regulation guidance.</p> <p>SFRS require adequate water supplies for firefighting, specific information as to the number and location can be obtained from the water officer via the normal consultation process.</p>		
Timothy Wicks	<ul style="list-style-type: none"> • Maintain and manage County Wildlife Site, suggests creating a pond to improve habitats • Suggests this could be maintained/managed using a community volunteer scheme • Allow (limited) public access to this area. 	The suggestions are appreciated and would need to be discussed at a later stage.	The Position Statement has a dedicated chapter on Open Space, Biodiversity and Green Infrastructure that includes information on the County Wildlife Site and public access to the space.
Graham Temple, Arrow Group Global Ltd	<ul style="list-style-type: none"> • Suggests division of land uses to minimise locating industrial/commercial uses close to housing, particularly in the area east of Colin Law Way. 	The information provided is appreciated.	The Position Statement specifies the location of different uses such as residential and employment land. Part of the land east of Colin Law Way is designated for employment land.

Name, organisation and agent	Comment Summary	Council Response	Action
	<ul style="list-style-type: none"> • Suggests reassigning this strip as industrial to create continuation of land use 		
John Thompson, Cycling UK	<ul style="list-style-type: none"> • Respondent is pleased to see an east to west cycling route included and would like to be consulted on future plans/proposals for the route • Suggests 20mph speed limits on new residential roads and claims this would reduce the need for off road cycling infrastructure • Walking and cycling infrastructure needs to be considered in all parts of the development • Separating cyclists from motor vehicles should be considered, and sharing with pedestrians or motor vehicles avoided where possible • All infrastructure should comply with LTN 1/20 • Primary school could be good candidate for School Streets scheme if located near the main access road. Trial 	<p>East Suffolk Council has commissioned a transport assessment to ensure additional traffic from proposed development can be accommodated and any issues can be mitigated.</p> <p>A primary school was allocated in policy WLP2.4 but Suffolk County Council has confirmed the additional school places are not required.</p>	<p>The Position Statement requires an east-west cycling, walking and wheeling route through the development.</p> <p>Consultancy WSP was commissioned in 2024 to review the capacity of key junctions to accommodate growth and any potential mitigation measures. Their report was published in April 2025 and it informed the Position Statement.</p>

Name, organisation and agent	Comment Summary	Council Response	Action
	schemes in Norfolk have all failed but there is evidence that they can be successful if well thought through.		
Ben	Concerned about traffic, particularly on Kirkley Run. This was exacerbated by closure of Durban Road. Witnessed three accidents due to closure of Waveney Drive. Those travelling to and from school are at particular risk. Concerned about lack of jobs and pressure on public services.	<p>East Suffolk Council has commissioned a transport assessment to ensure that proposed development can be safely accommodated by the transport network. The position statement will include safe access for pedestrians and cyclists, including school children travelling to nearby schools.</p> <p>GP and dental surgeries are not planning policy requirements for this site. The Norfolk and Waveney Integrated Care System (formerly the Norfolk and Waveney CCG) has not requested provision of a GP or dental surgery on this site or in the Waveney Local Plan area.</p> <p>Waveney Local Plan policy WLP2.4 included provision of a primary school, but Suffolk</p>	<p>The Position Statement provides safe access for cyclists and pedestrians including school children travelling to nearby schools.</p> <p>The Position Statement identifies locations for employment land.</p>

Name, organisation and agent	Comment Summary	Council Response	Action
		<p>County Council has stated that this is not necessary.</p> <p>The Position Statement includes provision of employment land.</p>	
Samantha Porter	Adequate service provision for additional residents. Provision of attractive waterside walks.	<p>GP and dental surgeries are not planning policy requirements for this site. The Norfolk and Waveney Integrated Care System (formerly the Norfolk and Waveney CCG) has not requested provision of a GP or dental surgery on this site or in the Waveney Local Plan area.</p> <p>The Position Statement will include the provision of a waterfront access. However, a continuous waterfront path will not be possible due to the operational needs of local employers.</p> <p>The Position Statement will contain the provision of an east-west cycle and pedestrian route.</p>	<p>The Position Statement requires an east-west cycling, walking and wheeling route through the development.</p> <p>The chapter on Urban Design includes waterfront access points.</p>
Tracy Pitcher	Questions whether there will be sufficient wildlife habitat.	The Position Statement will protect the County Wildlife Site from development and will also	The Position Statement has a dedicated chapter on Open Space, Biodiversity and Green

Name, organisation and agent	Comment Summary	Council Response	Action
		make provision of a network of open spaces across the site.	Infrastructure that includes information on the County Wildlife Site and public access to the space. The chapter also addresses wildlife issues such as Biodiversity Net Gain, the gulls and Habitat Regulation Assessments.
Mrs Amanda Frost	<p>Development should include waterfront access.</p> <p>Concern about pressure on public services, particularly NHS dentistry.</p> <p>There is also a proliferation of HMOs.</p>	<p>Provision of a waterfront path will not be possible due to the operational needs of waterfront employers. However, the Position Statement will include points of access to the waterfront and an east-west cycle and pedestrian route.</p> <p>GP and dental surgeries are not planning policy requirements for this site. The Norfolk and Waveney Integrated Care System (formerly the Norfolk and Waveney CCG) has not stated that there is a need for new GP or dental surgeries on this site or in the Waveney Local Plan area.</p>	The Position Statement includes providing points of access to the waterfront as well as an east-west cycle and pedestrian route.

Name, organisation and agent	Comment Summary	Council Response	Action
		The management of HMOs is outside of the scope of this document.	
Laurie Atkins	Infrastructure, sympathetic design, cycle and pedestrian access and impact on existing housing.	The Position Statement includes guidance about the provision of infrastructure and design. It also includes provision of an east-west cycle route. Design guidance will minimise impact of development on existing housing.	<p>The Position Statement requires an east-west cycling, walking and wheeling route through the development.</p> <p>The chapter of Urban Design aims to maximise the opportunities to create a place that reflects Lowestoft's historic and maritime character, and be a place the town can be proud of.</p>
Mike Healy	<p>Development should include public open space, sports facilities, retail and hospitality outlets.</p> <p>Development should be accessible with a possible exhibition venue.</p>	<p>The Position Statement will include the provision of a network of open spaces throughout the site, play areas) and an area for informal sports activities.</p> <p>The Position Statement also includes the provision of units to be used as retail and community facilities, although hospitality and exhibition space are beyond the scope of the document.</p>	The Position Statement requires open space, and NEAP and LEAP play areas.

Name, organisation and agent	Comment Summary	Council Response	Action
		<p>The Position Statement includes guidance to ensure that all facilities and parts of the site are accessible to cyclists and pedestrians. Disabled access is important and primarily addressed through Building Regulations,, but further guidance can be found in the Healthy Environments SPD.</p>	
<p>Craig Atkinson (Agent - Sarah Hornbrook Bidwells LLP)</p>	<p>Parts of the SPD are out of date.</p> <p>Certain aspects of the SPD should not be strictly applied.</p> <p>Very little development has been delivered.</p> <p>Seek to understand reasons for lack of delivery such as viability issues and unrealistic aspirations/ requirements in the SPD.</p> <p>Review Vision and Objectives. A pedestrian bridge and exemplar development are unrealistic.</p>	<p>It is agreed that the 2013 Supplementary Planning Document is out of date and very little development has been delivered since its adoption.</p> <p>The Position Statement will be adopted and will be a consideration in the determination of planning applications.</p>	<p>The Position Statement requires connectivity across the site.</p> <p>The Position Statement includes updated information on flood risk, land raising, drainage, and delivery of key infrastructure.</p> <p>The Position Statement sets requirements for each element of the site.</p>

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>Provide updated Guiding Principles and/or Masterplan/ Concept Plan that addresses connectivity, flood risk, land raising, drainage, and delivery of key infrastructure.</p> <p>Review the individual requirements of the SPD and set out which are relevant. Housing mix too prescriptive. Design requirements, such as perimeter block layouts, too inflexible. Vehicular street specifications too rigid.</p> <p>Include flexibility to reflect the development will be delivered in phases over years in different market conditions.</p> <p>Ideally use fresh evidence, particularly in relation to transport matters.</p> <p>Acknowledge evidence used for the SPD is out of date.</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>Give significant weight in the decision-making process to evidence submitted by applicants.</p> <p>Clarify the status to the Position Statement.</p> <p>The Position Statement must be adopted and be afforded weight in the decision-making process to be of value to developers.</p>		
Ross McGivern, Historic England	<p>Welcomes aims and objectives of current Local Plan and supporting SPD.</p> <p>No detailed comments at this stage but emphasises updating SPD to take account of guidance that has evolved since 2013. This could include permeability, flood mitigation, water management and SUDs, improved greening and wayfinding strategies connecting Kirkley Waterfront with the surrounding area.</p>	<p>Support noted. The Position Statement includes guidance about permeability through the site, as well as flood risk and drainage. It also makes provision for a network of green spaces throughout the site, as well as play spaces and spaces for informal sports activities.</p> <p>A design code is beyond the scope of this document but guidance is provided about views in and out of the site, particularly</p>	<p>The Position Statement requires an east-west cycling, walking and wheeling route through the development.</p> <p>The chapter on Urban Design aims to maximise the opportunities to create a place that reflects Lowestoft's historic and maritime character, and includes providing points of access to the waterfront.</p>

Name, organisation and agent	Comment Summary	Council Response	Action
	Supports the creation of a design code to deliver high quality design, character areas and respond to historic environment. Opportunity to update views in and out of the Waterfront development boundary and review any tall buildings strategy for the site.	towards Lake Lothing, as well as building heights.	
Sarah harper	Roads, healthcare and education. Small business sites. Recent traffic flow data.	<p>East Suffolk Council has commissioned a transport assessment to ensure that development proposed in the Position Statement can be accommodated on the road network.</p> <p>GP and dental surgeries are not planning policy requirements for this site. Norfolk and Waveney Integrated Care System (formerly the Norfolk and Waveney CCG) has not requested new health facilities on the site.</p> <p>Waveney Local Plan policy WLP2.4 included a requirement for a new primary school but</p>	<p>Consultancy WSP was commissioned in 2024 to review the capacity of key junctions to accommodate growth and any potential mitigation measures. Their report was published in April 2025 and it informed the Position Statement.</p> <p>The Position Statement includes an employment allocation on the Jeld Wen site and supports the retention of the employment land at Brooke Marine Business Park.</p>

Name, organisation and agent	Comment Summary	Council Response	Action
<p>Dick Houghrlton</p>	<p>Loss of wealth creating industries. Redevelopment of sites for housing removes land which could be repurposed for industrial uses. Cites example of Netherlands where specialist shipyards are located in coastal towns.</p> <p>Coastal locations could be redeveloped for tidal power.</p> <p>Brexit has provided the opportunity to redevelop the fishing industry.</p> <p>Economic regeneration would help to retain young people, who tend to leave the area once they achieve qualifications.</p>	<p>Suffolk County Council has since stated that this is not necessary.</p> <p>The Position Statement includes allocations for employment uses. The exact use of these allocations is not specified and could include marine uses or offshore energy businesses.</p> <p>Providing training opportunities is beyond the scope of this document.</p>	<p>The Position Statement sets out the requirements for the provision of land for employment.</p>
<p>gillian guttridge</p>	<p>Need consider wildlife on site, particularly gulls. Suggests involvement of RSPB to provide visitor facilities.</p>	<p>The Position Statement seeks to help protect the existing County Wildlife Site and the creation of a network of open spaces across the site.</p>	<p>The Position Statement has a dedicated chapter on Open Space, Biodiversity and Green Infrastructure that includes information on the County Wildlife Site and public access to the space. The chapter also</p>

Name, organisation and agent	Comment Summary	Council Response	Action
	Suggests provision of a tow path with seating, as well as a viewing tower.	<p>Development will include an east-west cycle and pedestrian route, which will be designed as a high-quality green corridor.</p> <p>Due to the operational needs of local employers a waterfront path will not be possible but the Position Statement will include provision of access points to the waterfront.</p>	<p>addresses wildlife issues such as BNG, the gulls and Habitat Regulation Assessments.</p> <p>The Position Statement requires an east-west cycling, walking and wheeling route through the development.</p>
Jamshid Melekzad, LCC	<p>Supports retention of the site for industrial use.</p> <p>Public slipway, enabling access to the lake.</p> <p>Provision of catering and entertainment facilities would be a nice addition.</p>	<p>The Position Statement includes provision of employment land. Quaysides and slipways will be retained and can be used by local employers.</p> <p>Provision of entertainment and catering facilities is beyond the scope of this document.</p>	The Position Statement includes an employment allocation on the Jeld Wen site and supports the retention of the employment land at Brooke Marine Business Park, complete with access to the quayside and slipways
Russel Hubbard	Affordable housing with green space and retail and leisure facilities. Suggests construction of and IKEA outlet.	The Position Statement includes housing allocations. Viability issues means that affordable housing provision will not meet the levels specified by the Local Plan, but the Council will seek to maximise affordable housing delivery when development proposals are considered.	The Position Statement sets out the housing, open space, play space and other land use requirements for each part of the site.

Name, organisation and agent	Comment Summary	Council Response	Action
		Provision of an IKEA outlet is beyond the scope of this document.	
Jack-Arthur Smith	<p>The spaces in front of and behind Heath Road supports a diverse range of wildlife.</p> <p>Retention of the reserve is inadequate and ignores rewilding that has taken place.</p> <p>Criticises lack of awareness of local issues and focus on new development at any cost.</p> <p>Proposed development on site is unrealistic. Smaller development that retains green spaces and wildlife habitat and takes account of infrastructure challenges would be supported.</p>	<p>The Kirkley Waterfront Position Statement will preserve the County Wildlife Site from development and provide a network of green spaces, which will include wildlife habitats.</p> <p>The Kirkely Waterfront Position Statement provides guidance for landowners for when they decide to develop their sites. It is not intended to develop the whole of the Kirkley Waterfront area at once.</p>	The Position Statement has a dedicated chapter on Open Space, Biodiversity and Green Infrastructure that includes information on the County Wildlife Site and public access to the space. The chapter also addresses wildlife issues such as Biodiversity Net Gain, the gulls and Habitat Regulation Assessments.
Georgia Teague, Suffolk County Council	<p>Natural Environment and Landscape:</p> <ul style="list-style-type: none"> Build on Objective 8 (Open Space and Environment) of the Kirkley Waterfront SPD (2013) and consider amenity on the public realm through 	<p>Natural Environment and Landscape:</p> <p>It is agreed that the green open space that provides well connected and attractive, direct routes are import for people and</p>	The Position Statement requires open space, NEAP and LEAP play areas, and walking and cycling east-west connection through the site which will maximise connectivity to the Gull Wing Bridge.

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>well-designed and beautiful places.</p> <ul style="list-style-type: none"> • The open spaces should be well connected and provide attractive, direct routes. • Open spaces should provide better connectivity for wildlife. • More vegetation, i.e. trees provided in smaller street layouts as well as main streets, to benefit wildlife and the micro-climate. Micro green spaces at the end of roads. • Promote inclusive design practices and include early and ongoing involvement of stakeholder/user groups. • Ensure the CWS can fulfil its ecological function and is not overwhelm recreational pressures, by creating spaces elsewhere in the development. • Consider section 12 and para. 136 of new NPPF. 	<p>wildlife. The references provided have been considered.</p> <p>Education: The Position Statement does not require the delivery of a primary school as Suffolk County Council has provided information that there are sufficient spaces in existing schools, due to declining birth rates.</p> <p>Highways: The references provided have been considered and are appreciated.</p> <p>Flood and Water Management: Policy WLP2.4 requires all new development to be subject to a specific flood risk assessment and WLP2.24 requires SuDS to be used. Suffolk County Council will be consulted on planning applications as the Lead Local Flood Authority.</p> <p>Public Health: The site has been allocated in the Waveney Local Plan and the Position Statement</p>	<p>There is a dedicated chapter on Open Space, Biodiversity and Green Infrastructure.</p> <p>There is a dedicated chapter on Flood Risk Management that includes information on flood resilience and mitigation, and land-raising.</p> <p>The Position Statement provides safe access for cyclists and pedestrians including school children travelling to nearby schools.</p>

Name, organisation and agent	Comment Summary	Council Response	Action
	<ul style="list-style-type: none"> Consider BNG in Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Consider Accessible Public Realm: Updating Guidance and further research, 2020. Consider report the public realm by CIHT. <p>Highways:</p> <ul style="list-style-type: none"> Ensure permeability for future users to key destinations and facilities, both on-site and off-site. Have key desire lines to on-site and off-site facilities and destinations. Ensure existing public transport can accommodate future occupants. Maximise connectivity to the Gull Wing Bridge for walking and cycling. Consider internal vehicle movements. 	<p>cannot alter the policy requirements in relation to population data or provide additional services and facilities. The Waveney Local Plan design policies require development to deliver high-quality, dementia friendly schemes.</p> <p>A GP surgery and dental surgery are not a planning policy requirement for this site. The Norfolk and Waveney Integrated Care System (formerly the Norfolk and Waveney CCG) have not requested a new GP surgery on this site or in the Waveney Local Plan area.</p> <p>Archaeology: The Position Statement is not addressing archaeological issues. Policy WLP8.40 requires an archaeological assessment where development may affect archaeological remains. Policy WLP2.4 does require ground contamination investigations.</p>	

Name, organisation and agent	Comment Summary	Council Response	Action
	<ul style="list-style-type: none"> Consider limiting vehicular access from the maintainable highway. Consider updating the base year traffic model. Consider reviewing a future scenario which includes the Gull Wing being open to traffic. Due to the Gull Wing and costs of new bridge, a pedestrian and cycle bridge is now not considered justified. Consider Suffolk Guidance for Parking 2023. Consider Suffolk Design Streets Guide. Consider Adopted Suffolk Minerals and Waste Local Plan 2020. <p>Flood and Water Management:</p> <ul style="list-style-type: none"> Need to identify the preferred outfall arrangements including river discharge. Have regard for the tide lock and the 	<p>Suffolk Minerals and Waste Local Plan 2020: The information received is appreciated and has been considered in the development of the Position Statement.</p>	

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>implications on the storage requirements across site. Sufficient storage will be required for a no-outfall tide lock scenario.</p> <ul style="list-style-type: none"> Widespread raising of levels on-site will require an in-depth assessment of how new proposed levels effect existing overland flows and where these may be routed by the site works. The Lead Local Flooding Authority would expect there to be a multifunctional, green open SuDS led approach with conveyance and attenuation features throughout the site from the early stages to achieve SuDS excellence. Consider latest SCC SuDS Guidance (2023). <p>Public Health:</p> <ul style="list-style-type: none"> Evidence base should identify 'key issues'. Undertake an Health Impact Assessment, 		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>which includes population data.</p> <ul style="list-style-type: none"> Consider Active Design, 20 minute neighbourhood, dementia friendly community principles, and Building for a Healthy Life. <p>Archaeology:</p> <ul style="list-style-type: none"> Suffolk County Council Archaeological Service (SCCAS) recommend (excluding the received archaeological evaluation (negative) in 2013) the whole site has a full Desk Based Assessment. SCCAS recommend contamination and GI investigations include archaeological monitoring and analysis. <p>Education:</p> <ul style="list-style-type: none"> Due to the location and flood zones, build costs for the school are likely to be higher. 		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>Public Health</p> <ul style="list-style-type: none"> • Kirkley ward is one of the most deprived wards in Suffolk. • SCC asks if consideration was given to pressure on GP practices. • SCC queries capacity of dentists. <p>Suffolk Minerals and Waste Local Plan 2020:</p> <ul style="list-style-type: none"> • Reference should be made to the Adopted Suffolk Minerals and Waste Local Plan 2020. • Note Safeguarded Site W3 North Quay, Lowestoft Port Authority. • Consider Policy MP9 – consideration will need to be given to whether the safeguard site may be compromised or lost by this development. • The site is within a Mineral Consultation Area for the possible extraction of minerals above the 5Ha 		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>threshold of Policy MP10. It needs to be shown that 'the sand and gravel present is not of economic value, or not practically or environmentally feasible to extract, or that the mineral will be worked before the development takes place or used within the development'.</p> <ul style="list-style-type: none"> Lowestoft port average 150,000 tonnes cargo per year. 		
Toby Feirn, Cadent Gas	<p>Cadent Gas should be consulted on any development that impacts their assets including access and protection easement. Cadent has an intermediate Pressure gas pipeline in the southern section of Brooke Marine off Kirkley Run.</p>	<p>The information received is appreciated and will be relevant to the planning application stage of development.</p>	<p>Cadent Gas will be consulted on Draft Position Statement.</p>
Christopher Elliston	<p>Respondent has lived in Lowestoft most of his life. He has seen the decline of industry and prosperity. The town's problems have been compounded by population growth and</p>	<p>It is agreed that employment and marine uses are important. Local Plan Policy WLP2.4 allocates land for employment use. However, the policy also allocates 1,380 homes. This Position Statement</p>	<p>The Position Statement includes an employment allocation on the Jeld Wen site and supports the retention of the employment land at Brooke Marine Business Park.</p>

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>associated issues with local infrastructure.</p> <p>Lowestoft has a unique geographic location with an entrance from the sea to the broads and is steeped in maritime history.</p> <p>The development is needed but building houses only serves to add to issue of low skilled employment, traffic congestion, stretched public resources and so on.</p> <p>We need industry and to produce.</p> <p>Look at Chatham docks and riverside development where there are houses as well as the marinas and facilities around them. What is built should provide wealth and prosperity and not just houses.</p>	<p>cannot alter the requirements of the policy.</p> <p>The site is not suitable for a tourism redevelopment like Chatham Docks. The heavy industrial uses on the site have resulted in contaminated land and contaminated buildings. There are also flood issues, and challenges with traffic and transport. Residential development offers the most financially viable way of redeveloping the site whilst also addressing the need for homes.</p>	

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>It is prime waterfront. We have the boat building college with sought after traditional skills.</p> <p>The fishing industry has gone and offshore gas will follow. Wind farms provide some relief. If Birds Eye leaves the town's people will be dependant on benefits.</p> <p>The area needs some housing and tidying up. We need industry and to make the port viable.</p>		
Mrs Rachel Dawes	<p>Emphasis on affordable housing (both for the retirees and other people).</p> <p>New buildings need reduced carbon, eco-friendly heating systems. Electric heating systems are more efficient and affordable compared to storage heaters.</p> <p>The respondent believes in mixed use developments with affordable eateries and leisure facilities for all ages.</p>	<p>The Position Statement cannot set new planning policies, specific requirements or targets.</p> <p>The Waveney Local Plan policy requires the site to provide a retirement community and that 20% of the dwellings delivered on the site to be affordable homes, however this is subject to financial viability.</p> <p>Restaurants are not a planning policy requirement for this site</p>	<p>The Position Statement requires open space including LEAP and NEAP play areas. The Position Statement s also provides for an east-west cycling, walking and wheeling route across the site.</p>

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>Some indoor and outdoor spaces for teenagers is crucial.</p> <p>The respondent requests there are no fast-food restaurants.</p> <p>Ensure pedestrians, cyclists and other people have space and access to the area.</p>	<p>but could be included with a local retail centre.</p>	
<p>Norman Castleton</p>	<p>Raising land levels to combat flooding is unrealistic because of lack of stability. Flood protection is incomplete due to the lack of a harbour barrier.</p> <p>A lack of jobs makes buying a house impossible.</p> <p>There is a lack of proper unrestricted access to surrounding road network e.g. Victoria Road & Waveney Drive.</p> <p>The land should be used for business & industrial development to make use of logistics e.g. access to road, rail and water frontage.</p>	<p>The Position Statement cannot set new planning policies, specific requirements or targets.</p> <p>Waveney Local Plan policy allocates the site for 1,380 home to help meet the identified housing need in the Waveney Local Plan area.</p>	<p>The Position Statement has a dedicated chapter on Flood Risk Management that includes information on flood resilience and mitigation, and land-raising.</p> <p>The Position Statement includes an employment allocation on the Jeld Wen site and supports the retention of the employment land at Brooke Marine Business Park.</p> <p>Consultancy WSP was commissioned in 2024 to review the capacity of key junctions to accommodate growth and any potential mitigation measures. Their report was published in April 2025 and it informed the Position Statement.</p>

Name, organisation and agent	Comment Summary	Council Response	Action
	The area should be used to create jobs and bring prosperity to the town and surrounding area.		
Edward Gittins FRTPI, Inland Waterways Association : IWA Planning Advisory Panel	<p>Inland Waterways Association promotes and safeguard inland waterways.</p> <p>The development should contribute to waterside character, amenity and facilities.</p> <p>IWA wants to be kept informed of progress.</p>	The information provided is appreciated.	Inland Waterways Association : IWA Planning Advisory Panel will be consulted on the Draft Position Statement.
Clare Howe, Sport England	<p><u>Jeld Wen Playing Fields</u></p> <p>The Jeld Wen development would result in the loss of playing fields.</p> <p>Sport England would object, unless it meets one or more of the exceptions set out in Sport England's Playing Field Policy and met paragraph 103 of the NPPF. Exception 4 of Sport England's Playing Fields Policy is most relevant in this case which requires a new playing field meets the following criteria:</p>	<p>Jeld Wen Playing Fields: The playing fields have been vacant for approximately a decade. The former playing fields have planning permission for residential development and a legal start has been made on site. The Position Statement will not alter the policy requirement/ planning permission for residential development on the former playing fields.</p> <p>A primary school was allocated in planning policy WLP2.4 but</p>	<p>The Position Statement does not require the delivery of new playing fields, but does provide for open space, and LEAP and NEAP play areas.</p> <p>The principle of active design have been incorporated in a broad/ highly level way appropriate to the scope of the Position Statement.</p>

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>1. It should be of equivalent or better quality.</p> <p>2. It should be of equivalent or greater quantity.</p> <p>3. It should be located in a suitable area.</p> <p>4. It should have equivalent or better accessibility and management arrangements.</p> <p>It is recommended that the wording of Exception 4 is paraphrased within the SPD as follows, <i>'The replacement playing fields will take place at a suitable location, ensuring that they are of equivalent or greater size, equivalent or better quality, and subject to equivalent or better accessibility and management arrangements as the existing playing fields.'</i></p> <p>The Position Statement should require the needs of the new housing development to be met through the provision of indoor and outdoor sporting provision.</p> <p>Need to prevent additional</p>	<p>Suffolk County Council has confirmed the additional school places are not required, due to declining birth rates.</p>	

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>pressure on existing sports facilities creating or exacerbating deficiencies in existing sporting facilities.</p> <p>Strongly advise reference is made to the Active Design Guidance within the Position Statement.</p> <p><u>Active Design</u></p> <p>Sport England, Active Travel England and OHID, has produced 'Active Design', a guide to planning new developments. The guidance sets out ten key principles that aimed to promote and create healthy communities through good urban design inline with section 8 of the NPPF.</p> <p>Sport and physical activity should be considered early in the master planning and design of the Position Statement.</p> <p>Sport England recommend the Local Planning Authority to use the Active Design Checklist and it</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>is appended to the Position Statement or referred to.</p> <p>Including Active Design within the Position Statement would assist the Council in delivering their vision of a healthy population and a healthy environment.</p> <p>The respondent provided a list of case studies around the country that have integrated Active Design within planning policy, SPDs and/or developments: Alconbury Weald, Maylands, Stevenage town centre, and Baytree Nuneaton.</p> <p><u>Community Use</u> If the school development includes outdoor and/or indoor sporting facilities, the school should allow community use of these facilities. This would help meet the community's needs for sports facilities near where they live. A Community Use Agreements can be an effective</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>tool to achieve this. Revenue from community use can fund ongoing maintenance. The school would need to complete a community use agreement. The Position Statement should include reference to Sport England's guidance on preparing Community Use.</p>		
<p>Alice Canning Tye, Natural England</p>	<p>This site is near The Broads National Park (NP), Broadland Special Protection Area (SPA)/Ramsar site, The Broads Special Area of Conservation (SAC) and Sprat's Water and Marshes, Carlton Colville Site of Special Scientific Interest (SSSI).</p> <p>Assessment of the impact on the protected landscape and designated sites will be required at the application stage, including project-level Habitats Regulations Assessment. Design and landscaping including greenspace, should take account of its location in the setting of the protected landscape.</p>	<p>The information and references provided are appreciated and have been considered and included in the Position Statement in a broad/ high level way that is appropriate for the scope of this Position Statement.</p> <p>Many of the issues raised will be addressed the planning application stage.</p>	<p>The Position Statement has a dedicated chapter on Open Space and Biodiversity which includes relevant information on Green Infrastructure.</p>

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>Green Infrastructure (GI) – Natural England advises that onsite Green Infrastructure should be included within the development.</p> <p>The advice is to support the development of the Position Statement and planning applications.</p> <p>The broad principles in Suitable Accessible Natural Green Space (SANGS) guidance can be helpful in designing GI.</p> <p>Natural England advise that minimum provisions should include:</p> <ul style="list-style-type: none"> • High-quality, informal, semi-natural areas • Circular dog walking routes of 2.7 km within the site and/or with links to surrounding public rights of way (PRoW) • Dedicated ‘dogs-off-lead’ areas • Signage/information leaflets to householders to promote these areas for recreation 		

Name, organisation and agent	Comment Summary	Council Response	Action
	<ul style="list-style-type: none"> • Dog waste bins • The long term maintenance and management of these provisions <p>Natural England recognises the sites constraints and encourage the inclusion of principles and standards in Natural England's GI Framework within the position statement.</p> <ul style="list-style-type: none"> • Network of spaces: Create a connected, green network throughout the development using smaller and larger areas of greenspaces. Use the Accessible Natural Green Space Standards (ANGSt) when considering the adequacy of the provision whether sufficient green space is provided. Map spaces using the Green Infrastructure Map. • Existing features: The Position Statement should identify habitats, and work to retain and enhance them 		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>alongside additional green space.</p> <ul style="list-style-type: none"> • Living Streets: If you propose to include street trees, Natural England refers you to the urban tree manual from Forest Research. All planting should be done in accordance with British Standard BS 8545:2014. • Sustainable drainage systems (SuDS): Natural England support SuDS to manage surface water disposal. SuDS can be used to create wetland habitats for wildlife. The CIRIA guidance provides useful information about integrating SUDs and biodiversity. The maintenance of SuDS should be provided for the lifetime of the project. • Management: Ongoing management and monitoring required to ensure green space continues to benefit the community. This should be considered in future 		

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	<p>design stages and set out in any planning application. Refer to Guide 9: Long-Term Stewardship - Town and Country Planning Association (tcpa.org.uk).</p> <ul style="list-style-type: none"> • Multifunctionality: A key component of GI is it's multifunctionality. Green space can provide space for exercise, improve mental and physical wellbeing, reducing flood risk, improve air quality and provide space for communities. • Accessibility: Consider the accessibility and inclusivity of the space. All users need to be able to access greenspace and feel safe. The design should include accessible signage and information about sites. <p>Biodiversity Net Gain – Net gains for biodiversity must be in accordance with the NPPF paragraphs 180(d), 185 and 186 and at least 10% from 12</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>February 2024. The BNG Planning Practice Guidance provides further information on how BNG is calculated and implemented.</p> <p>Could reference or consider the Natural England's Nature Networks Evidence Handbook which was published in 2020 and builds upon the Lawton Review.</p> <p>Suffolk Coast RAMS – The development is in the 'Zone of Influence' (Zol) for European designated sites scoped into the Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy ('RAMS').</p> <p>Certain types of new development (including new tourist accommodation) in this area is 'likely to have a significant effect' on these European designated sites.</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>The application of measures to avoid or reduce the likely harmful effects will need to be formally checked and confirmed by East Suffolk Council via an appropriate assessment in view of the European Site's conservation objectives and in accordance with the Conservation of Habitats & Species Regulations 2017 (as amended).</p> <p>As a larger residential development in the Suffolk Coast RAMS zone of influence, the development will not be able to fully mitigate the adverse impacts on European designated sites with a RAMS payment alone. Developments should include the provision of well-designed open space / green infrastructure (GI), that is proportionate to its scale to minimise any predicted increase in recreational pressure to designated sites, by containing the majority of recreation within</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>and around the development site boundary and / or bespoke mitigation measures. Please refer to our above advice on Green Infrastructure.</p> <p>It is a matter for East Suffolk Council to decide whether an appropriate assessment of this proposal is necessary in accordance with the Conservation of Habitats & Species Regulations 2017.</p>		
<p>Alex Jessop, Suffolk Wildlife Trust</p>	<p><i>Brooke Yachts and Jeld-Wen Mosaic CWS</i></p> <p>The Kirkley Waterfront includes Brooke Yachts and Jeld-Wen Mosaic County Wildlife Site (CWS). They have an open mosaic of habitats on previously developed land and a small area of intertidal mudflat (biodiversity priority habitats). It provides food, shelter, and nesting sites for a wide range of wildlife. The site has significant biodiversity value. It supports the common</p>	<p>The information and resources provided are appreciated and have been considered.</p> <p>There is an outline planning permission which includes some housing, a retail centre, primary school and new access road to the Brooke Business Park being delivered on the CWS. The Position Statement cannot affect the existing planning permission.</p> <p>It is agreed that Kirkley Waterfront development should be an exemplar development,</p>	<p>The Position Statement aims to retain and enhance the Brooke Yachts and Jeld-Wen Mosaic County Wildlife Site, subject to the need for a new road access in the existing planning permission.</p> <p>Suffolk Wildlife Trust will be consulted on the Draft Position Statement.</p>

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>lizards, breeding song thrush, linnet and other birds.</p> <p>Information provided reiterates that in 2015 planning permission which would see the loss of an area of the CWS Planning permission DC/13/3482/OUT would greatly decrease the ecological value of the CWS and the biodiversity value of this part of Lowestoft. Suffolk Wildlife Trust stand by previous comments and notes no significant impact to the CWS has occurred.</p> <p>The CWS provides an opportunity to put nature at the heart of development, building on the 2013 SPD. This builds on Para.185 of the NPPF.</p> <p><i>Constraints, Changes, and Issues Relating to Kirkley Waterfront</i></p> <p>There are limited aspects Suffolk Wildlife Trust can comment on.</p>	<p>however we are mindful of the serious challenges developers face on this site including contaminated land, contaminated building, flooding, vehicular access, biodiversity and other issues. The highest quality scheme should be delivered within the scope of what is financially viable.</p>	

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>The principles and key elements for delivering exemplar nature-friendly development are cited below.</p> <p>Overall, Suffolk Wildlife Trust welcome the opportunity for specific discussion on the noted constraints, changes, and issues with all stakeholders.</p> <p><i>Delivering Exemplar Development at Kirkely Waterfront</i></p> <p>Kirkley Waterfront should focus on development which is planned, designed, and built with nature at its heart. Nature recovery, health and wellbeing benefit local people. They ensure development is integrated with the natural environment at every level. Local habitats and species should be retained and incorporated creating nature-friendly development that contributes to the nature</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>recovery network. It would allow the Council to show commitment to biodiversity.</p> <p>Key elements of nature-friendly development include:</p> <ul style="list-style-type: none"> • Strict adherence to the mitigation hierarchy. A focus on avoiding impacts to habitats of biodiversity value and enhancing these where possible. The CWS provides a central point for this to be delivered. • Biodiversity Net Gain with a meaningful contribution towards nature recovery in line with CIEEM best practice guidelines. Delivery of net gain should go beyond 10%. Focus on providing net gain early in the development process. The declaration of a biodiversity emergency in East Suffolk provides initial justification that delivering net gain above the mandatory minimum level of 10% is both reasonable and 		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>necessary.</p> <ul style="list-style-type: none"> • That Green Infrastructure (GI) design, creation, and management should be led by local wildlife priorities, such as key habitats or species. GI can include tree planting, which will deliver wildlife and community benefits. A reduction or avoidance of pesticide and herbicide use for the health of the food chain and limiting any runoff or leaching into Lake Lothing. • Improve the ecological corridors identified in the SPD. GI is important when delivering ecological corridors and stepping stones and can be linked with green travel routes with an aim of encouraging cycling and walking. GI and ecological corridors can show that the biodiversity crisis and the climate crisis can be tackled together. • Consider sustainable development with wildlife in 		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>mind, considering energy and water efficiency, keeping development within the environmental limits.</p> <ul style="list-style-type: none"> • Encourage engagement of residents and workers with nature and the natural environment by including integrated bird boxes, green roofs, and community planting schemes. <p>Further information is available from Suffolk Wildlife Trust.</p> <p><i>Summary</i> Suffolk Wildlife Trust are happy to be consulted and thank East Suffolk Council for contacting them. They welcome further opportunities to discuss biodiversity at Kirkley Waterfront with the Council and stakeholders.</p>		
Fiona Brown, Associated British Ports	Written behalf of Associated British Ports (ABP) which is located adjacent to the Kirkley	The information provided is appreciated and has been considered.	The Position Statement explains that employment land is considered to be an appropriate

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	<p>Waterfront site. ABP is grateful for the opportunity to be involved in the preparation of the Planning Position Statement.</p> <p>ABP is a strong supporter of the Council's efforts to build Lowestoft's economy. The Port of Lowestoft – along with ABP's other East Anglian ports at Ipswich and Kings Lynn – contribute £360m annual to the UK economy, supports 3,700 jobs in the region and 5,300 jobs nationally (2019 figures). The Port supports growth in the offshore renewable energy sector, other offshore energy activities and other trades. The Port has finite space which is in high demand.</p> <p>The Kirkley site is a fantastic opportunity for the redevelopment ABP welcomes the Planning Position Statement. ABP notes it is important that key issues are correctly identified, understood and taken</p>		<p>use on the south side of Lake Lothing opposite ABP operations.</p>

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>account of in any future development proposals.</p> <p>Key issues that the Planning Position Statement should consider:</p> <p>One key issue is that the Kirkley Waterfront area is located adjacent to the Port of Lowestoft – a facility that operates 24 hours a day seven days a week and is a dynamic land use that is able to change the type of activities occurring in relatively short order.</p> <p>ABP's Permitted Development rights</p> <p>ABP's ownership expands to the navigational channel and land north of the Kirkley Waterfront development site, specifically the Brooke Marine and Jeld Wen parts of the site.</p> <p>ABP benefits from permitted development rights that enable the port to carry out a range of activities.</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>What is currently a relatively quiet part of the Port could intensify very quickly without requiring planning permission. This could impact future residents / uses of the Kirkley Waterfront site, unless mitigated against. New development must be sensitive to existing uses and avoid potential issues which may prejudice the continued operation and expansion of these uses at the Port.</p> <p>Kirkley Waterfront as an ‘agent of Change’</p> <p>It is critical the Position Statement reflects the ‘agent of change’ planning principle set out para. 193 of the NPPF, in respect of the Port.</p> <p>The development would introduce new (noise-sensitive) receptors near the Port. The development requires careful management to mitigate impacts</p>		

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	<p>that might prejudice the operation of the Port.</p> <p>The Position Statement should make clear that this is incumbent on any future development to mitigate any impacts on future residential occupants, rather than impinge on the current and on-going port operation.</p> <p>Impact should be mitigated for two reasons. First, any compromise to future port operations will limit the overall potential of the wider Lowestoft economy. Secondly, the viability of this new neighbourhood is likely to be contingent on Lowestoft reaching its full economic potential.</p> <p>The Position Statement must identify the relationship between the site Port as a key issue.</p> <p>The statement should encourage developers to engage with ABP at an early stage to ensure that</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>issues are addressed at an early stage through the pre-application design process.</p> <p>ABP suggests adding Lowestoft Eastern Energy Terminal (LEEF) to the Council's list of recent changes affecting the site.</p> <p>Lowestoft Eastern Energy Facility, was granted consent in 2022 and is under construction.</p> <p>It is part of the Port Gateway project that will benefit from Lowestoft's £24.9M towns. Once completed it will provide opportunities for the supply chain as Lowestoft remains at the forefront of operational support for the renewable sector. The Council should consider impacts of development with future uses to support the energy transition.</p> <p>There is an option agreement for SZC on the Former Shell Base piece of land (13 acres adjacent</p>		

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	to the Kirkley Waterfront development site). This could be utilised for any number of workstreams by the SZC team.		
Statuslist Ltd. (Agent - Pegasus Group)	<p>Representations by Pegasus Group on behalf of Statuslist Ltd.</p> <p>Statuslist welcomes this opportunity to work with the Council.</p> <p>It is essential that the Position Statement reflects the realities of regeneration on brownfield land and provides sufficient flexibility to involved.</p> <p>Need to regenerate the Kirkley Waterfront.</p> <p>Statuslist intends to submit an Outline Planning Application for the former Jeld Wen Factory site in April 2024.</p> <p>Statuslist has engaged with East Suffolk Council, Lowestoft Town</p>	The information provided is appreciated and has been considered.	The planning application for the former Jeld Wen site has been received by East Suffolk Council and negotiations regarding the site are taking place.

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>Council, key stakeholders and the public and made representations to the Regulation 14 consultation of the Lowestoft Neighbourhood Plan in December 2023. Overall discussions have been positive.</p> <p>The sites been identified for redevelopment for a long time in different Planning documents. The planning policy guidance is now out-of-date and needs updating. Statuslist is keen to feed into this work to ensure proposals are deliverable.</p> <p>The key issues that Planning Position Statement should consider are:</p> <p>1. The Gull Wing Bridge & Colin Law Way: It is a significant new infrastructure asset that will help alleviate congestion and provides new connections over Lake Lothing. The current policy</p>		

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	<p>requirement for a new pedestrian / cycle bridge should be removed. Development needs to be designed around Colin Law Way.</p> <p>2. The Tidal Barrier: The tidal barrier on hold due to a funding shortfall. The Former Jeld Wen Factory Site is not reliant on the Tidal Barrier. The 'more vulnerable' land uses will need to be raised. The costs associated with land raising should be factored into the Council's guidance.</p> <p>3. Site Remediation: Due to the historic industrial uses it is anticipated that remedial works will be required to address ground contamination, demolition and clearance. The redevelopment of brownfield land involves significant upfront abnormal costs which should be factored into the Council's guidance.</p>		

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	<p>4. Land Uses: Due to the cost's flexibility is needed, particularly regarding the location and quantum of employment and housing.</p> <p>Proposals for the Former Jeld Wen Factory Site include up to 500 homes and up to 3.2 hectares of employment land. The spatial distribution is broadly in line with the previous guidance with an uplift in residential land use and a reduction in employment land.</p> <p>5. Phasing & Design Aspirations: The Former Sanyo Factory Site and the Brooke Peninsula benefit from extant planning permissions but have not come forward. This highlights the viability constraints.</p> <p>Statuslist has committed significant investment. The Former Jeld Wen Factory Site should be identified as 'Phase 1' of the allocation, which will establish the key design</p>		

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	<p>principles, such as connectivity between the different parcels. A waterfront pedestrian/cycle path is not compatible with the intended employment uses. The Former Jeld Wen Factory Site seeks to deliver a pedestrian/cycle path as part of a Strategic Green Infrastructure corridor between the proposed employment and residential land uses, linking the site with the adjoining Brooke Peninsula to the west and Colin Law Way to the east.</p> <p>6. Social Infrastructure and Affordable Housing: Social land uses should be provided within a central location within the allocation (i.e. within the Brooke Peninsula area) accessible to whole of the new community. Need to review the requirements for certain complementary land uses (e.g. the Primary School). The Position Statement should be based on an up-to-date</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>evidence base of local needs in this regard and the allocation requirements updated accordingly. The Position Statement should explicitly recognise the viability challenges.</p> <p>7. Mandatory Requirements: Additional requirements such as mandatory Biodiversity Net Gain have been introduced since the Local Plan adoption, which impacts viability in the form of additional land take requirements and/or higher build costs.</p> <p>Summary The reality of the significant up-front costs must be acknowledged by East Suffolk Council and sufficient flexibility be introduced in policy terms to ensure viable schemes can come forward.</p> <p>The Position Statement should take into account detailed and</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	up-to-date investigation of the site's baseline conditions that will be provided in the forthcoming Outline Planning Application.		
Taylor Williams, Lowestoft Town Council - Planning Committee	<p>Request for heath infrastructure (doctors and dentists).</p> <p>Costs associated with land contamination need to be considered.</p> <p>Flood risk needs to be considered.</p> <p>The Town Council is concerned development up to the waterfront could be detrimental to future light industrial use.</p> <p>There needs to be provision for light industrial use.</p> <p>Need to consider sewerage systems.</p> <p>Need to consider access roads.</p>	<p>A GP surgery and dental surgery are not a planning policy requirements for this site. The Norfolk and Waveney Integrated Care System (formerly the Norfolk and Waveney CCG) have not requested a new GP surgery on this site or in the Waveney Local Plan area.</p> <p>Waveney Local Plan policy WLP2.4 requires planning applications to include a full site investigation of ground contamination and a flood risk assessment.</p> <p>Planning applications will also need to provide evidence of Sustainable Drainage and traffic assessments.</p>	<p>The Positions Statement's supports employment land along the waterfront of the former Jeld Wen site.</p> <p>The Position Statement includes an employment allocation on the Jeld Wen site and supports the retention of the employment land at Brooke Marine Business Park, including access to the quayside and slipways.</p>

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<p>James Goldberg, East Suffolk Council (Agent - GP Planning Limited (Maureen Darrie))</p>	<p>GP Planning Ltd are the planning agents, representing East Suffolk Council regarding the former Sanyo and Survitec Site.</p> <p>The Waveney Local Plan, SPD, emerging Position Statement and associated planning policies and guiding principles will be material considerations in the determination of planning application.</p> <p>The Council, as landowner of this site, is keen to ensure that the site can be delivered in a timely manner in collaboration with promoters and developers of neighbouring sites.</p> <p>The opportunity to provide views on what should be included in the Position Statement is appreciated.</p> <p>Status of the Planning Position Statement</p> <p>The consultation document states that the Position</p>	<p>The 2013 SPD will remain in place.</p> <p>The Position Statement will be a material consideration when determining planning applications.</p> <p>The Position Statement is a high level document that sets out the masterplan and framework for the redevelopment of the site. It also includes information on changes in circumstance and legislation since the adoption of the 2013 SPD.</p> <p>The Position Statement is a high level document which allows a reasonable degree of flexibility to accommodate the sites challenging financial viability issues. Detailed matters are to be addressed at the planning application stage.</p>	<p>The Position Statement has a dedicated chapter on Open Space and Biodiversity that addresses issues such as biodiversity, open space, and green infrastructure.</p> <p>The Position Statement has a Land Use chapter and Priorities for Each Site chapter. These two chapters provide information on key matters for each element of the site.</p> <p>The Position Statement include a dedicated chapter on Urban Design which sets out the key criteria for redevelopment.</p> <p>Consultancy WSP was commissioned in 2024 to review the capacity of key junctions to accommodate growth and any potential mitigation measures. Their report was published in April 2025 and it informed the Position Statement.</p>

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>Statement will not alter the Local Plan policy, the SPD will also remain in place and the Position Statement will bring clarity to help bring forward development.</p> <p>Need to know if the Position Statement be a material consideration in the determination of forthcoming planning applications.</p> <p>How are the SPD and Position Statement intended to interrelate?</p> <p>The Position Statement would seem better suited as an Addendum to the SPD.</p> <p>Matters the Planning Position Statement Should Address</p> <p>1. The extent to which legislative and environmental context has changed since the SPD was adopted. The Position Statement should make it very clear which elements of the SPD are no longer to be relied upon or given</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>weight in decision making. Include guidance on Biodiversity Net Gain and future 30-year management plans, energy resilience and adaptation and managing climate change.</p> <p>2. The Position Statement should comment in detail on the current updated matters needing to be considered which differ from the existing masterplan in the SPD, to assist delivery in a collaborative and comprehensive manner.</p> <p>3. The Position Statement should address open space provision (formal and informal) and plan for equalisation across the masterplan area. The existing outline masterplan in the SPD shows limited open space across the new housing areas, with a central playing field block on the former Sanyo and Survitec site.</p> <p>4. Review the land use budget in the SPD.</p> <p>5. Update the SPD objectives to reflect changes in national planning policy including design</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>codes, BNG and deletion of reference to exemplar development which will impact on viability.</p> <p>6. Update the design guidance in the SPD to provide overarching design principles.</p> <p>7. The housing mix and tenure will most likely need to be updated accordingly.</p> <p>8. The Position Statement should make the Council's position on a flexible approach to viability.</p> <p>9. Now that the Third Crossing is nearing completion modelling related to the anticipated use in lieu of any updated data on actual levels of usage and any updated baseline should be reflected in the Position Statement.</p> <p>10. The strategic phasing, programming and delivery in the SPD should be updated to reflect local changes.</p> <p>11. There is a need for co-ordination on land levels across the area to ensure that individual development plots are not</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>compromised.</p> <p>12. The Position Statement should make the Council's approach to BNG across the allocation clear, highlighting the potential for a more collaborative approach to delivery where there are challenges on specific sites.</p> <p>13. The Position Statement should set out the Council's planning application requirements with reference to any changes to national and local validation alongside site specific requirements.</p>		
<p>Louise Gooch, East Suffolk Councillor for Kirkley and Pakefield</p>	<p>The consultation document set out the current situation clearly.</p> <p>The list of proposed areas for consideration in the planning development documents is comprehensive and clear, and the list touches upon the most important considerations.</p> <p>To this, I would only add the following by way of emphasis:</p>	<p>The comments are appreciated.</p>	<p>The Urban Design chapter notes that the design should reflect the site's industrial and maritime history.</p> <p>The Position Statement requires an east-west cycling, walking and wheeling route to improve connectivity across the site and to the Gull Wing Bridge.</p> <p>The Position Statement includes a dedicated chapter on Flood</p>

Name, organisation and agent	Comment Summary	Council Response	Action
	<ul style="list-style-type: none"> • Include some commemoration/celebration of the history of the land and all of the industries and individuals. • Show how transport can link the site to Lowestoft town centre and western suburbs, and include a waterside cycle route along the length of the lake. • The Gull Wing bridge has changed whole ambience of Lowestoft. The development has the potential for business, home-life, leisure and recreation. <p>Development must address the issue of flooding as there is no funding for a tidal barrier.</p>		<p>Risk Management that includes information on flood resilience and mitigation, and land-raising.</p>
Shamsui Hoque, National Highways	<p>The site's development could impact the Strategic Road Network particularly to and from the road junction between A47 and B1532, located immediately south of the Bascule Bridge, Lowestoft. Accordingly National Highways would welcome</p>	<p>The information and advice are appreciated.</p> <p>Planning applications for the site are required by policy to submit a Transport Assessment and Travel Plan.</p>	<p>Consultancy WSP was commissioned in 2024 to review the capacity of key junctions to accommodate growth and any potential mitigation measures. Their report was published in April 2025 and it informed the Position Statement.</p>

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>further opportunity to respond to future consultations.</p> <p>National Highways highlight that any moderate development would require a:</p> <p>Transport Assessment where there is an increase in traffic movements during peak hours which impacts the Strategic Road Network and;</p> <p>A Construction Management Plan whereby they would welcome plans to reduce HGV movements during peak hours.</p>		
Pat Abbott, Environment Agency	<p>Environment Agency comments relate to Flood Risk, Environmental Permitting, Land Contamination, Biodiversity Net Gain, Sustainable Development, Climate Change, Water Resources and Waste Water Disposal.</p> <p>Environment Agency would welcome further engagement as</p>	<p>The information and advice are appreciated.</p> <p>Any planning application for the development of the site is required to submit a flood risk assessment and full site investigation of ground contamination.</p>	<p>The Position Statement includes a dedicated chapter on Flood Risk Management that includes information on flood resilience and mitigation, and land-raising.</p>

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	<p>detailed plans for the area are considered.</p> <p><u>Flood Risk</u> The Council should consider the NPPF's weighting of the impacts of climate change on the sustainability of some areas for development.</p> <p>Consider paragraph 167(d) of the NPPF regarding flood risk. The Council needs to understand the future frequency and impacts of flooding (both in and around the developments) when making decisions.</p> <p>The Flood risk & coastal change PPG paragraph 009 refers to Strategic Flood Risk Assessment's (SFRA), and the Position Statement should comply with it when considering the flood risk issues.</p> <p>Small parts of the site are in Flood Zone 3b (functional floodplain), however with</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>climate change large parts will be in Flood Zone 3b in the future.</p> <p>Table 2 of the NPPG states that only the water compatible and essential infrastructure land use classes, shown in Annex 3 of the NPPF, are compatible in Flood Zone 3b and that all other forms of development should not be permitted.</p> <p>Paragraph 165 of the NPPF requires local planning authorities to avoid siting inappropriate forms of development in areas at risk of flooding and directing development away from areas at highest risk (whether existing or future).</p> <ul style="list-style-type: none"> • The Position Statement should highlight the need to apply the Sequential Test and, where necessary, the Exception Test as set out in 		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>NPPF paragraphs 167, 168, 169 and 170.</p> <ul style="list-style-type: none"> • The Position Statement should highlight the need to determine the acceptability of flood risk in relation to emergency planning capability. • The Position Statement should highlight the need for site specific food risk assessments. <p>There may be ways to redevelopment of this area to be climate resilient and meet the requirements of the Sequential Test and, where necessary, the Exception Test and comply with PPG Paragraph 079 Table 2 (Flood risk vulnerability and flood zone 'incompatibility')</p> <ul style="list-style-type: none"> • Land raising areas above the tidal 0.5% annual exceedance flood level, plus upper end climate change including a 		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>300mm freeboard to make it safe. This will change flood water propagation characteristics and may also impact on existing surface water and drainage flow paths in these areas with the potential to increase flood risks to third parties if not designed properly.</p> <ul style="list-style-type: none"> • Building a tidal flood defence to defend against the tidal 0.5% annual exceedance flood event, plus upper end climate change. <p>There could be opportunities to manage the flood risk through the built development. The buildings could act as the flood defences, the defences can be set back from the river and could be an aesthetic enhancement compared to a separate flood defence (e.g. a concrete wall). The Position Statement may consider these options and</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>recommend a preferred approach.</p> <ul style="list-style-type: none"> • Sequentially siting less-vulnerable development uses on the ground floor accepting that they will flood frequently and requiring resilient construction to aid recovery after flooding.. • Sequentially siting non-habitable elements of more vulnerable uses on the ground floor accepting that they will flood frequently and requiring resilient construction to aid recovery after flooding. • Ensuring that there are robust emergency plans at both development, District and County level. <p><u>Flood Resilient/Resistant Construction</u></p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>Consider flood proofing measures to reduce the impact of flooding when it occurs.</p> <p>The EA encourages development to incorporate flood resilience/resistance measures up to the extreme 0.1% (1 in 1000) year climate change flood level. Both flood resilience and resistance measures can be used for flood proofing.</p> <p>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'.</p> <p>Flood resistant and resilient development is now a policy requirement as set out in NPPF paragraph 173(b).</p> <p><u>Safety of Building</u> Development should be designed to provide both habitable areas</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>and refuge areas above the predicted flood levels. It is important buildings are structurally resilient to withstand flood water. Supporting information and calculations should be submitted.</p> <p><u>Safety of Inhabitants – Emergency Flood Plan</u></p> <p>The Environment Agency does not normally comment on or approve the adequacy of flood emergency response procedures and they would delivering flood warnings to occupants/users covered by our flood warning network.</p> <p>The PPG states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered.</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>A key considerations is whether adequate flood warnings would be available to people using the development.</p> <p>Where flood warning are necessary local planning authorities should consider the emergency planning and rescue implications of new developments in making their decisions.</p> <p>Local Authority Emergency Planners and the Emergency Services should review the position statement to ensure it appropriately considers the emergency planning capability.</p> <p>No new tidal flood risk hydraulic model is currently available.</p> <p><u>Environmental Permitting Regulations</u></p> <p>Applicants may need an environmental permit for flood risk activities if they want to do work in, under, over or within</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>8m of the river and of any flood defence structure or culvert of Lake Loathing which is designated a 'main river'.</p> <p>The EPR are a risk-based framework that enables us to focus regulatory effort towards activities with highest flood or environmental risk. Lower risk activities will be excluded or exempt and only higher risk activities will require a permit. Your proposed works may fall under an either one or more of the below:</p> <ul style="list-style-type: none"> • 'Exemption, • 'Exclusion', • 'Standard Risks Permit' • 'Bespoke permit. <p>Anyone carrying out these activities without a permit where one is required, is breaking the law.</p> <p><u>Groundwater and Contaminated Land</u></p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>There may be contamination to ground waters. Planning applications should include relevant information to satisfy the requirements of the NPPF including a Preliminary Risk Assessment.</p> <p><u>Contaminated land advice sources for developers</u></p> <p>We recommend that developers should:</p> <ol style="list-style-type: none"> 1) Refer to our ‘Groundwater Protection’ website; 2) Refer to our CL:AIRE Water and Land Library (WALL) and the CLR11 risk management framework. 3) Refer to our Land Contamination Technical Guidance; 4) Refer to ‘Position Statement on the Definition of Waste: Development Industry Code of Practice’; 5) Refer to British Standards BS 5930:1999 A2:2010 Code of practice for site investigations and BS10175:2011 A1: 2013 		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>Investigation of potentially contaminated sites – code of practice</p> <p>6) Refer to our ‘Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination’ National Groundwater & Contaminated Land Centre Project NC/99/73. The selected method, including environmental mitigation measures, should be presented in a ‘Foundation Works Risk Assessment Report’, guidance on producing this can be found in Table 3 of ‘Piling Into Contaminated Sites’;</p> <p>7) Refer to our ‘Good Practice for Decommissioning Boreholes and Wells’.</p> <p>8) Refer to SuDS Manual (CIRIA C753 , 2015), Guidance on the Construction of SuDS C768, the Susdrain website and the EA Groundwater protection position statements (2018), in particular Position Statements G1 and G9 – G13.</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>9) Refer to our ‘Dewatering building sites and other excavations: environmental permits’ guidance when temporary dewatering is proposed</p> <p><u>Standard Sustainable Drainage Systems</u></p> <p>In brief, our general requirements with regards to SuDS are:</p> <ol style="list-style-type: none"> 1. Infiltration SuDS such as soakaways, unsealed porous pavement systems or infiltration basins shall be used where they do not pose a risk to the water environment. 2. Infiltration SuDS must not be constructed in contaminated ground. 3. Only clean water from roofs can be directly discharged to any soakaway or watercourse. Surface water from associated hard-standing etc shall be incorporated into pollution 		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>prevention measures with suitable SuDS treatment train components.</p> <p>4. The maximum acceptable depth for infiltration SuDS is 2.0 m below ground level, with a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels.</p> <p>5. Deep bore and other deep soakaway systems are not appropriate in areas where groundwater constitutes a significant resource. If deep soakaways are proposed you should contact us, as an environmental permit maybe needed.</p> <p>Please also refer to the SuDS Manual (CIRIA C753, 2015), the Susdrain website (http://www.susdrain.org/) and the draft National Standards for SuDS (Defra, 2015) for more information.</p> <p><u>Biodiversity Net Gain</u></p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>Landscaping proposals should consider ecological enhancement as per the NPPF and Natural Environment White Paper (2011).</p> <p>The development is an opportunity to provide multi-functional benefits - providing open space for residents, sustainable transport links, wildlife/ecological value, climate change resilience, improved water quality and flood risk management.</p> <p><u>Biodiversity Metric Within the current system</u></p> <p>The Natural England Biodiversity Metric is not intended to replace or supersede any of the current environmental legislation. If used the previously unaccounted for environmental damage to sites will be measured and compensated for.</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p><u>Suggested Policy Environmental Net Gains for inclusion within Local Plans</u></p> <p>Biodiversity or geodiversity on new development should be increased by at least 10%.</p> <p>Planning permission will only be granted in exceptional circumstances, where the benefits of the development demonstrably outweigh both the harm caused and the uplift in biodiversity.</p> <p>A metric calculation should be submitted with planning applications and the the mitigation hierarchy adhered to.</p> <p>1 http://publications.naturalengland.org.uk/publication/5850908674228224</p> <p>2 https://www.forest-trends.org/bbop/bbop-key-concepts/mitigation-hierarchy/</p> <p>3 Para 118 – National Planning Policy Framework</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p><u>Sustainability</u></p> <p>Climate change is one of the biggest threats to the economy, environment and society.</p> <p>New development should resilience and able to adapt, particularly with regards to infrastructure such as water supply, treatment and quality and waste disposal facilities.</p> <p>Need to limit the consumption of natural resources.</p> <p>The planning system, tackling these climate change problems.</p> <p><u>Overall sustainability:</u> a pre-assessment under the appropriate Code/BREEAM standard should be submitted with the application. The design Stage and Post-Construction certificates should sought through planning conditions.</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p><u>Resource efficiency</u>: the efficient use of resources in new development is crucial.</p> <p><u>Sustainable energy use</u>: design the development to minimise energy demand. Have decentralised and renewable energy incorporated.</p> <p><u>Climate Change</u> The UK Climate Change Risk Assessment (2022), The Climate Change Committee's (CCC) Independent Assessment of UK Climate Risk (2021), the UK Climate Projections (UKCP18), a BBC and Met Office tool UKCP18, and the Environment Agency (EA) report, Living better all provide recommended information on climate changed.</p> <p><u>Water Resources</u> Evidence indicates that groundwater abstraction is already or is at risk of causing ecological damage to Water</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>Framework Directive designated waterbodies.</p> <p>The development should consider whether the water resource needs can be supplied sustainably without adverse impact to WFD waterbodies and chalk streams.</p> <p>You must have regard to River Basin Management Plans and be in accordance with Local Plan policies.</p> <p>Ensure the local Water Recycling Centre has sufficient capacity.</p> <p>Have a maximum of 110 litres per person per day standard as per Building Regulations.</p> <p>Consider all water saving options including rainwater harvesting and greywater systems.</p> <p>The EA recommends all new non-residential development of 1000sqm gross floor area or</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>more should meet the BREEAM 'excellent' standards for water consumption.</p> <p><u>Foul Water Disposal</u></p> <p>Anglian Water Services should be consulted regarding the available capacity in the foul water sewer. If there is not sufficient capacity in the sewer then the EA must be consulted again with alternative methods of disposal.</p> <p>Should you wish us to review any technical documents or want further advice to address any environmental issues, we highlighted in this response, we can do this as part of our charged for service.</p> <p>Early engagement will speed up our response times for formal responses and could result in a better quality and more environmentally sensitive development.</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
Michael Stannard, MP Associates Ltd	<p>The Brooke Marina planning consent includes a Primary School, County Wildlife site and other benefits.</p> <p>MP Associates Ltd are keen to continue working with East Suffolk Council and other Stakeholders.</p> <p>There are significant collective challenges including –</p> <ul style="list-style-type: none"> • Rising Sea levels and latest changes on Flood Risk • New Building Regulation changes and requirements • Legislative Changes • Rising build costs • Increased Interest Rates for Development Finance • Inflation • S106 costs • Current Market Conditions 	The extant planning permission on the Brooke Marina is acknowledged.	<p>The Position Statement includes an employment allocation on the Jeld Wen site and supports the retention of the employment land at Brooke Marine Business Park, including access to the quayside and slipways.</p> <p>The Position Statement aims to retain and enhance the Brooke Yacht and Jeld-Wen Mosaic County Wildlife Site, subject to the need for a new road access.</p>

Name, organisation and agent	Comment Summary	Council Response	Action
	<ul style="list-style-type: none"> • Lack of appetite currently from Developers and National House Builders • Protection of the Environment and mitigation of Climate Change • Employment • Rising infrastructure costs <p>All Landowners need to work with East Suffolk Council together with Homes England and other Statutory bodies to find solutions to the challenges.</p> <p>To make the development more viable, desirable and affordable it may require amendments to the current consent.</p> <p>MP Associates Ltd are willing to negotiate changes and facilitate changes to the current 'Reserved Matters' consent and/or a Section 93a/Section 76 process.</p>		

Name, organisation and agent	Comment Summary	Council Response	Action
	<p>The Kirkley Waterfront Landowners Forum has provided a good platform discuss issues.</p> <p>MP Associates Ltd confident the development can include proposals outline by the Council such as improved connectivity (East to West) for cycling, walking and wheeling across all sites.</p> <p>MP Associates Ltd remain a committed and willing partner in this process.</p>		

Appendix 3: Feedback from developers and landowners during production of the Kirkley Waterfront Position Statement

This table summarises the main issues raised, the Council's response and how they informed the preparation of the document.

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight , proposed text to delete struck out .)	Council Response	Action
Pegasus (Agents for Jeld Wen)	Page 5 Key changes since the adoption of the SPD in 2013 Suggestion: amend to include reference to the pedestrian and cycle routes now allowed for along Colin Law Way and over the bridge. Consider including connections to these routes in the E-W route that this document is seeking to secure.	This is reasonable as the sections of cycling and walking infrastructure along Colin Law Way could contribute to the wider east-west route.	Add “ <i>with associated pedestrian and cycling infrastructure</i> ” to points 7 and 9.
Agents for Jeld Wen	Page 6 Additional sentence proposed at the end of second paragraph – There is also no evidence to confirm when or if the reserved matter scheme will be implemented.	The paragraph has been deleted as it repeats details and information from another section later in the text.	No action as paragraph has been deleted due to repetition.
Agents for Jeld Wen	Page 6 Housing – a high-quality design and layout that maximises the delivery of new homes. As a regeneration site in the middle of Lowestoft, a density of approximately 50 – 90 dwellings per hectare would be appropriate. It is acknowledged that a higher density of housing will influence the level of open space that can be delivered at this site and the applicant will be expected to demonstrate appropriate solutions to open space provision. Varying heights are to be expected, with some landmark/‘entrance’ buildings expected to be higher to provide focal points. Taller buildings	Agree that the first change is appropriate (re-worded slightly), as the amount of open space will indeed need to reflect the density and number of dwellings.	Change to say: “ <i>The density and overall numbers of houses will influence the level of open space that can be delivered on individual sites and applicants will be expected to demonstrate</i> ”

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight, proposed text to delete struck out.)	Council Response	Action
	near and along the waterfront are supported to maximise longer views across Lake Lothing to the north		<i>appropriate solutions to open space provision."</i>
	<p>Page 6 Housing – The provision of 5% of housing should be self-build/custom-build housing is desirable and a proportion of 5% across the entire site is requested. Viability considerations will be taken into account when considering this provision and the proportion within individual development parcels may vary.</p> <p>They further stated that the position statement should include reference to evidence used in determining self-build dwellings are appropriate in this location. They have raised concerns over self-build units in this location.</p>	<p>Disagree with the proposed change. 5% self-build for schemes of 100+ dwellings is a requirement of Policy WLP8.3 and the need for self-build, based on numbers on the Register, is only growing (and the text will be updated to clarify this point). No evidence has been advanced to show that that it is inappropriate/unviable for the site and the policy (WLP2.4) does not remove the requirement for self-build.</p> <p>Any proposal for a scheme of 100+ dwellings to not include</p>	<p>Alter the text to say: "5% of housing on sites of 100+ dwellings should be self-build"</p>

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight , proposed text to delete struck out .)	Council Response	Action
		5% self-build would have to be considered on its individual merits.	
Agents for Jeld Wen	Page 7 “wheeling” needs defining.	Wheeling is an alternative to foot/pedestrian-based mobility utilising wheels. This can include wheelchairs, mobility scooters and prams amongst other methods of movement.	Definition of wheeling to be added to the position statement in the glossary.
Agents for Jeld Wen	Page 7 Employment land – should be provided primarily on the northern part of the former Jeld Wen factory site, given that it is close to the 24-hour port operations on the northern side of Lake Lothing (operated by Associated British Ports), which can sometimes be noisy and may be so would be inappropriate for residential development. Provision of this use will take into account the most recent need for such floorspace, including whether the employment uses on the Brooke Marine site are to remain. Where the need for this use is uncertain, alternative uses that are compatible with the wider development site will be considered	Paragraph 2.40 of the Waveney Local Plan highlights that the activities incompatible with port uses and other businesses should be avoided, largely due to amenity concerns. Employment land is a key part of the allocation of land at Kirkley Waterfront and with uncertainty about the future of the Brooke Marine site, no	No action required.

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight , proposed text to delete struck out .)	Council Response	Action
		alternative scenario to employment land on the north could be seriously envisaged in the Position Statement, especially given the burgeoning offshore wind and cleantech demands for land (some related to Sizewell C). Any different proposals to this would have to be considered on their merits.	
Agents for Jeld Wen	<p>Page 7</p> <p>Class E(g) (formerly B1), B2 and/or B8 uses are all identified in Policy WMP2.4 as appropriate, although higher-intensity B8 uses (storage and distribution), such as 24 hours-a-day operation, would not be supported, given the proximity of residential dwellings. Uses which support the cleantech (offshore wind/Sizewell C) industry will be particularly supported. Some new smaller/start-up employment units will encouraged if the redevelopment of the Brooke Marine site is a certainty be important to deliver, if practicable.</p>	An appropriate mix in the scale of the employment units to include smaller/start-up units will create broader opportunities for a range of business needs. A scheme in this location should aim to deliver these smaller/start-up units. However, this requirement is	No action required.

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight , proposed text to delete struck out .)	Council Response	Action
		quantified by the words 'if practicable' if the demand is demonstrably for larger units and the smaller/start-up units would be unviable then there is flexibility in the requirement. As before, cleantech and quayside demand for space is key.	
Agents for Jeld Wen	<p>Page 7</p> <p>The Council would support the retention of some or all of the existing Brooke Business Park for employment and marine uses, should the permitted high-density residential development scheme from 2015 continue to not come forward. In such circumstances, this will necessitate a reconsideration of the need for employment uses on the wider site that this document relates to.</p>	<p>Whilst the Position Statement seeks to support the continued use of the Brooke Business Park for employment use, this does not guarantee its retention, especially in the light of the certificate of lawfulness for the site.</p> <p>Regardless, an objective in the SPD is to retain</p>	No action required.

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight , proposed text to delete struck out .)	Council Response	Action
		employment uses along the Waterfront, which will enable businesses to take advantage of the opportunities presented by the growing onshore and offshore renewable energy sector, new port related activities and an existing skilled work force. Other uses alongside the Jeld Wen waterfront site would run contrary to this objective and remove important quay headings.	
Agents for Jeld Wen	<p>Page 8 – para.1. New pedestrian crossings of Waveney Drive/Victoria Road are therefore required and funding for these will be explored through the planning application process must be paid for (through S106/S278 agreements) by the developers of the Kirkley Waterfront sites. It is likely that at least two, and potentially three, crossings will be necessary.</p> <p>They further stated that the Position Statement should not detail the method of payment for any obligations whilst uncertainty remains over</p>	The delivery of appropriate crossings is key to ensuring the acceptability of development proposals and so the wording cannot be as loose as proposed. However, a refinement to indicate	Alter the text to say: <i>“New pedestrian crossings of Waveney Drive/Victoria Road are therefore required and funding for these will be secured primarily or entirely via planning applications by the</i>

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight, proposed text to delete struck out.)	Council Response	Action
	the costs and method of delivery. They believe that this should be determined through the application process.	that there might be other funding sources as well as S106/S278 will be added.	<i>developers of the Kirkley Waterfront sites."</i>
Agents for Jeld Wen	<p>Page 8 Free pre-school hours for children aged 9-24 months, varying by age, have very recently been introduced by the Government, with an anticipated increase in increasing demand and expectation for pre-school places (previously only older children were eligible for free hours). As there is an existing deficit of Early Years places in the Kirkley area, full a 30-place pre-school, expandable to 60 places if needed, is currently indicated as required on each of the three main sites – Jeld Wen/Status list, Brooke Marine and Sanyo/Survitec – as a result of the number of homes collectively proposed.</p> <p>They further questioned whether there is sufficient evidence for a shortfall in early year places. In addition, they believe having several early year schools in close proximity will provide unwelcome competition that will put off potential operators.</p>	This minor wording change is agreed with, although to be altered slightly.	Alter the text to say: <i>"...been introduced by the Government, which is expected to increase in increasing demand..."</i>
Agents for Jeld Wen	Putting a 6mo in preschool is a choice for many parents - not a demand or even a requirement (unlike primary education). It does not follow that the provision of free places will automatically increase demand.	Whilst the first part of this is true, the whole rationale of the Government's approach is to incentivise parents to be able to return to work earlier (if they want to) and so it is	No action required.

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight , proposed text to delete struck out .)	Council Response	Action
		considered all but inevitable that demand will increase. The NPPF definition of “Early Years” is “ <i>a child from birth to the September after the child turns 5</i> ”.	
Agents for Jeld Wen	<p>Page 8</p> <p>The locations must have good transport connections to enable parents/carers to be able to conveniently and safely walk/cycle with their child(ren) or drop them off on their way to work. Each site will therefore need to ensure delivery of an appropriately-sized (0.22ha) pre-school on their landholdings, to meet Suffolk County Council’s requirements. The requirements for each site will be negotiated with SCC through the application process having regard to the wider development proposal and the relevant CIL tests sites must be flat, regular shaped, fully serviced, be within Flood Zone 1, be free of encumbrances, and have no contamination (or be clear of any contamination) and be transferred to Suffolk County Council for £1. Suffolk County Council needs to be involved with identifying the location of each site and would expect the promoters to provide necessary surveys and cover the costs of the feasibility studies. Options for new sites elsewhere in the area – especially connected to existing education establishments – are being explored by Suffolk County Council. Should it later be determined that appropriate and adequate pre-school provision is available (or will be made available) elsewhere in the local area, then the need for some of the pre-school provision might reduce or fall away, in which case one or</p>	<p>It is accepted that the precise details of SCC’s site requirements do not need to be included, and some re-wording will take place. It is not necessary to explicitly support housing as the re-use should there be a reduced need for Early Years provision but in reality this is by far the most likely alternative use.</p>	<p>Change the text to say: “<i>Should it be determined...could potentially be released for other uses, with housing the most likely alternative use.</i>”</p>

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight, proposed text to delete struck out.)	Council Response	Action
	more of the pre-school site(s) could potentially be released for other uses. The Council will support the reuse of such facilities for housing.		
Agents for Jeld Wen	<p>Page 8/9</p> <p>It is clear that much has changed since the SPD was adopted in 2013 and the comprehensive and co-ordinated re-development of the Kirkley Waterfront envisaged in the SPD and the Local Plan may not is now unlikely to occur. Therefore, requiring proportionate contributions from each site towards the overall requirement is a now more sensible alternative. It remains the preference of the Council to provide a single large area of open grass of about 60 x 90m (5,400m²), for informal recreation within the Kirkley Waterfront area. However, if that cannot be negotiated then the Council will expect each of the three biggest sites will therefore need to provide suitable open space and play facilities within each site having regard to the density of the development and the uses proposed. As a starting point, the Council will expect to see the provision of a their own LEAP on each site and, unless mutual agreement can be reached to provide a single large area of open grass of about 60 x 90m (5,400m²), for informal recreation – which would be preferred – somewhere on the site as a whole, each of the three biggest sites will have to provide their own area of with informal, usable, greenspace totalling of about 1,800m². A reduced requirement will be considered where the development can still provide high quality open space and connections to facilities in the wider area.</p>	The proposed amendments are broadly sensible, but will be modified slightly to reflect the fact that great clarity is needed on play space.	Alter the text to say: “It is clear that much has changed since the SPD was adopted in 2013 and the comprehensive and co-ordinated re-development of the Kirkley Waterfront envisaged in the SPD and the Local Plan may not is now unlikely to occur. Therefore, requiring proportionate contributions from each site towards the overall requirement is a now more sensible alternative. It remains the preference of the Council to provide a single large area of open grass of about 60 x 90m (5,400m ²), for informal recreation

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight , proposed text to delete struck out .)	Council Response	Action
			<p><i>within the Kirkley Waterfront area.</i></p> <p><i>However, if that cannot be negotiated then the Council will expect each of the The three biggest sites will therefore need to provide suitable open space and play facilities within each site having regard to the density of the development and the uses proposed. As a starting point, the Council will expect to see the provision of a their own LEAP on each site and, unless mutual agreement can be reached to provide a single large area of open grass of about 60 x 90m (5,400m²), for informal recreation – which would be preferred – somewhere</i></p>

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight , proposed text to delete struck out .)	Council Response	Action
			on the site as a whole, each of the three biggest sites will have to provide their own area of with informal, usable, greenspace totalling of about 1,800m ² . A reduced requirement might be considered where the development can still provide high quality open space and connections to facilities in the wider area.
Agents for Jeld Wen	<p>Page 10 <i>Key matters</i></p> <ul style="list-style-type: none"> • A minimum of 23 hectares of employment land along the quayside. Offices (Use Class E(g), (formerly B1), light industrial (B2) and/or storage and distribution (B8) uses are all appropriate, although given the proximity of existing and future residential dwellings, any B8 uses would need to be carefully controlled (hours of operation, for example) to minimise the potential for amenity and disturbance impacts. <p>They further stated that lower levels of employment land could allow for other uses.</p>	<ul style="list-style-type: none"> • This will stay as 3ha to reflect overall needs. Any proposal to reduce this would need to be justified through a planning application • It won't be acceptable to 	<ul style="list-style-type: none"> • No changes • Alter to say "Investigate and ensure both short-term..." • No changes • Alter to say: "A site area of at least 0.22ha for a 30-place pre-school setting,

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight, proposed text to delete struck out.)	Council Response	Action
	<ul style="list-style-type: none"> • Investigate and where possible provide Provide both short-term and long-term habitats to enable the gulls who currently nest on-site to relocate. A full survey of gull habitats will also be required. • A secondary vehicular access for emergency purposes may be needed (primary access is to be via Colin Law Way). • A site area of at least 0.22ha for a A 30-place pre-school setting, expandable to 60 places, must be provided. This must be in an accessible location for the dropping off and collecting of children and be within Flood Zone 1 post mitigation. • Incorporate an Provide for part of the East-West cycling and walking route through the site, including connecting through to Colin Law Way. • Investigate appropriate financial contributions to improving cycling and walking connections to primary schools, GP surgeries and other key services secured through section 106 or section 278 agreements having regard to the viability of the scheme. This will include contributing to a safe crossing point (or points) of Waveney Drive/Victoria Road. • A Locally Equipped Area of Play (LEAP) of approximately 400m² to be provided on site, plus additional approximately 1,800m² green (open) space for informal recreation, unless the location and funding of a single larger open space site of about 5,400m² can be reached through agreement of the main landowners. • A full contamination survey with appropriate mitigation undertaken prior to the implementation of the development. 	<p>not properly to address the gull issue, as they roost and nest on the site and are protected species</p> <ul style="list-style-type: none"> • No changes sought • Changes agreed – this improves clarity • Agree to this re-wording (with some minor additions) – it is only the section of the E-W path within this site which can be asked for • A safe crossing point(s) is essential and the other matters are highly desirable 	<p>expandable to 60 places, must be provided. This must be in an accessible location for the dropping off and collecting of children and be within Flood Zone 1 post mitigation”</p> <ul style="list-style-type: none"> • Alter to say: “Incorporate an East-West cycling and walking route through the site, including connecting through to Colin Law Way and an appropriate connection to the Brooke Marine site to the west.”

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight , proposed text to delete struck out .)	Council Response	Action
	<p>They further stated that as there is no final design at this stage which means there is uncertainty regarding the level of contamination surveys needed meaning this should be dealt with by way of planning condition.</p>	<p>but viability matters can only be considered in the context of a planning application</p> <ul style="list-style-type: none"> • With further modifications, agree to the change proposed on open space • Agree to the change for the reason given. 	<ul style="list-style-type: none"> • Alter to say: <i>“Appropriate contributions (financial and/or direct delivery) towards a safe crossing point (or points) of Waveney Drive/Victoria Road will be necessary. Contributions towards improving cycling and walking connectivity to key local services will also be sought.”</i> • Alter to say: <i>“...plus additional green (open space) for</i>

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight , proposed text to delete struck out .)	Council Response	Action
			<p><i>informal recreation, indicatively about 1,800m², unless the location...”</i></p> <ul style="list-style-type: none"> • Alter to say: <i>“...mitigation undertaken prior to the implementation of the development.”</i>
Agents for Jeld Wen	The agents for the developer noted that different parcels of land are under different ownerships which provides uncertainty for the site as a whole. They ask that the Planning Position Statement considers alternative approaches for sites that do not progress as well as guidance for how other sites can progress around this.	No response.	No changes.
Agents for Jeld Wen	<p>Page 17 - East-West Cycling and Walking Route</p> <p>The agents for the developer note that lack of progress from one site could jeopardise an east-west cycle route and asks that the Position Statement acknowledges this and provides guidance on how such an eventuality will be approached.</p>	This is true – all each individual landowner can do is provide the section through their land. The Council does have Rights of Way (Permissive Path) powers to potentially enable it to deliver a	Change the text to say that a Public Path Order or similar will be considered if needed.

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight, proposed text to delete struck out.)	Council Response	Action
		section of the crossing if it is not coming forward.	
Agents for Jeld Wen	Page 18 To mitigate the inability to deliver a cohesive waterfront path across the entire Lake Lothing frontage, access points to the waterfront should must be considered that enable views of/across Lake Lothing. These access points should be linked to the central East-West cycling and walking route and SANG paths where possible. However, the small area of beach (which is part of the County Wildlife Site) must be protected from public access, due to the impacts of disturbance on wildlife there.	Agree to this change.	Change “must” to “should”.
Agents for Jeld Wen	Page 18 – Crossing Points A minimum of three crossings, broadly spread out across the southern edge of the site, are likely to be necessary. These off-site improvements will be required via developer obligations (a S106/S278 agreement). They further stated that other funding methods should not be ruled out.	Agree about reducing the specificity of S106/S278 agreements, but there must remain a clear link to developers contributing towards these.	Alter text to say: <i>“Appropriate contributions must be made towards the crossings by the developers, with the details to be discussed through individual planning applications”.</i>
Agents for Jeld Wen	Page 18 – Crossing Points A crossing would be expected to be provided (whether directly or via contributions) at least by each of the landowners/developers of the Sanyo, Brooke Marine and Jeld Wen sites to ensure each individually provides appropriate access and connections to facilities in the rest of Lowestoft, and individual Transport Assessments to support planning applications must inform the details of this.	Agree that this text duplicates text elsewhere.	Delete this paragraph.

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight, proposed text to delete struck out.)	Council Response	Action
	They further stated this paragraph could be deleted.		
Agents for Jeld Wen	<p>Page 19 - Connectivity to be provided (to outside the site) This is unreasonable and un-priceable at this stage. The development should commit to connecting into existing points around the edge of the site and the scope for wider connections must be a matter for individual applications. You have already acknowledged the viability issues with the site and this section adds further ambiguity to the potential cost to the delivery of a scheme that meets the PPS. Suggest deletion of entire section.</p>	Noted and agreed that the text should be revised accordingly.	Alter the text to say: <i>“Good connectivity to the immediate surrounding area will be necessary, with the details to be discussed and negotiated through individual applications.”</i>
Agents for Jeld Wen	<p>Page 19 - Public Transport A bus route through the Kirkley Waterfront site is recognised now as not being practicable, meaning a central pull-in facility will also not now be necessary. Appropriate bus stop locations along Waveney Drive/Victoria Road – and potentially a pull-in bus facility close to the proposed pre-school locations – will be necessary instead. Existing stops may be appropriate, but there may be is likely to be a need for shelters, real-time passenger information displays and hardstanding, where feasible). This will be explored at through individual planning applications.</p> <p>It is important that the individual developments are designed to provide direct routes to these bus stops (through cycling/walking paths) to ensure suitable maximum walking distances are achieved (in other words, no parts of the site are too far away from the stops). Further, there may be the need to make developer contributions (\$106</p>	The role for negotiations and viability in the context of individual applications is agreed, but it is important to note that the Position Statement is not a Local Plan. The need for transport contributions towards bus improvements are therefore not an explicit policy requirement, but may be necessary, as noted (“...there may be	Alter the text to say: <i>“...there may be a need for...” and “This will be considered through individual planning applications”.</i>

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight, proposed text to delete struck out.)	Council Response	Action
	<p>agreement) to increase bus frequencies along Waveney Drive/Victoria Road.</p> <p>They stated this is an additional obligation on a complex site that should instead be considered during the determination of individual applications.</p>	a need to make developer contributions...”).	
Agents for Jeld Wen	<p>Page 24</p> <p>Play provision is to be delivered before 50% occupancy on each separate site (HE SPD) unless alternative arrangements are considered to be appropriate to ensure the timely delivery of the development scheme.</p>	The details of each site will be negotiated separately, but there is no need to caveat the Position Statement on this point – this is an important benchmark.	No change.
Agents for Jeld Wen	<p>Page 27 Flood Risk Management – Sequential test -</p> <p>How does this fit with the requirement to now provide preschool settings?</p>	As the site is a mixed-use scheme on an allocated site, and there will be a requirement for the Early Years settings to be within Flood Zone 1 (after any necessary mitigation), it is concluded that the sequential test will not need to be re-considered.	No change.
Brooke Marine -	Page 6- Introduction	Planning permission DC/13/3482/OUT is	Alter text to say: “...Subsequently, a

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight, proposed text to delete struck out.)	Council Response	Action
MP Associates	<p>This site received outline permission in 2015 and a reserved matters approval for a first phase of 69 homes, with a Certificate of Lawfulness to confirm the formal commencement of phase 1 (on the former playing field) issued in April 2024 to confirm that The Permission DC/13/3482/OUT has been lawfully implemented and is an extant consent. The only works to date are the initial foundations for one house and there is no current evidence that any further development will be completed in accordance with the permitted scheme.</p>	<p>extant, with the Certificate of Lawfulness confirming this. However, it is very questionable whether any further development on this site will come forward as envisioned by the consent. The requested changes to the first paragraph will be made but the second sentence is factually accurate and so will remain.</p>	<p>reserved matters approval for a first phase of 69 homes was granted, with a Certificate of Lawfulness issued in April 2024, which confirms that planning permission DC/13/3482/OUT has been lawfully implemented and is extant.”</p> <p>Delete: “This site received outline permission in 2015 and a reserved matters approval for a first phase of 69 homes, with a Certificate of Lawfulness issued in April 2024, which confirms that planning permission DC/13/3482/OUT has been lawfully</p>

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight , proposed text to delete struck out .)	Council Response	Action
			implemented and is an extant consent.
Brooke Marine - MP Associates	Page 8- Biodiversity Net Gain Suggested new text at end of paragraph- The position on the Brooke Marine site, with the extant planning permission from 2015, is more complicated and this will need to be explored in more detail and agreed separately with the Council.	It is agreed that Brooke Marine has an extant planning permission (DC/13/3482/OUT) and so biodiversity requirements will need to be explored separately.	Add text at the end of paragraph 1 to say: “...2015 planning permission. As the situation is complicated, it will need to be explored in more detail and agreed with the Council. ”
Brooke Marine - MP Associates	Page 10- Brooke Marine A Certificate of Lawfulness application was granted in 2024 (reference DC/24/0489/CLE) such that it was confirmed that the permission had been lawfully commenced implemented , following the approval of reserved matters for Phase 1. However, this simply constitutes the concrete foundations for one dwelling (on the former football pitch), and no substantive development has taken place, nor is any taking place, at the time of writing.	Some minor re-wording is appropriate, but it is factually correct to state that only the foundations of a single plot have been installed.	Alter text to say: “ <i>Certificate of Lawfulness application was granted in 2024 (reference DC/24/0489/CLE) such that it was confirmed that the permission had been lawfully implemented, following the approval of reserved matters for Phase 1. The implementation was</i> ”

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight , proposed text to delete struck out .)	Council Response	Action
			<i>secured through the construction of concrete foundations on a single plot, and no substantive development..."</i>
Brooke Marine- MP Associates	Page 10- Brooke Marine- Key matters However, a 30-place pre-school setting, expandable to 60 places if needed, must be provided and this would ideally be sited in a more southerly part of the site...	The extant permission requires Early Years provision, and an Early Years setting of 30, expandable to 60 places, is required on all three main sites, unless alternative provision can be secured by Suffolk CC. The site will need to be in Flood Zone 1 (allowing for any necessary land raising). Some amendments to the text will be made to clarify the situation. Delivery of the pre-school facility will be necessary to meet the future need identified	Alter text to say: <i>"...must be provided and not within the County Wildlife Site. It must be in an accessible location for the dropping off and collecting of children and also be in Flood Zone 1 (through land-raising, if necessary).</i>

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight , proposed text to delete struck out.)	Council Response	Action
		<p>by Suffolk County Council. It is agreed that the southern part of the site will be preferable because it will be in flood zone 1 and it will be easier to collect and drop children off. The section 106 agreement for DC/13/3482/OUT makes the following requirements. Schedule 2 states that no more than 60% of dwellings in a reserved matters tranche shall be occupied unless the education contribution has been paid to the county council. Schedule 3 states that the County Council shall use the education contribution for a primary school, including early years provision. Any money</p>	

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight, proposed text to delete struck out.)	Council Response	Action
		not spent within 5 years of the final educational contributions shall be transferred to the District Council as affordable housing contribution. Schedule 8 sets out the conditions under which land shall be transferred to the County Council for construction of a primary school and pre school setting.	
Brooke Marine - MP Associates	Page 10- Brooke Marine- Key matters Should the permitted high-density residential development from 2015 on the northern promontory continue to not come forward. is now considered highly unlikely to be viable.	It is important to state the Council's view in this Position Statement, which is that a high-density and high flatted scheme is clearly unviable (in part due to post-Grenfell Building Regulations changes increasing the cost of such schemes, but with other factors involved	No changes.

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight , proposed text to delete struck out .)	Council Response	Action
		too). This situation, in the Council's opinion, is highly unlikely to change in the short to medium term at the very least. No changes to the text will therefore be made.	
Brooke Marine - MP Associates	Page 10- Brooke Marine- Key matters Notwithstanding the consented (but largely unimplemented) scheme for the site...	The permission has been implemented for the outline scheme, so this change will be made.	Alter text to delete <i>"...but largely unimplemented..."</i>
Brooke Marine - MP Associates	Page 10- Brooke Marine- Key matters Housing to be focused on the southern part of the site, including the phase which has the benefit of a Certificate of Lawfulness. This must be accessed via the consented (but unbuilt) road through the Waveney Drive junction	The Council's view is that housing should be focused on the southern part of the site, south of the County Wildlife Site, so this will remain, but the suggested deletion is reasonable and so will be made.	Delete text: <i>"...including the phase which has the benefit of a Certificate of Lawfulness..."</i>
Brooke Marine -	Page 10- Brooke Marine- Key matters	The suggested text is already stated in the	No changes.

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight, proposed text to delete struck out.)	Council Response	Action
MP Associates	Biodiversity Net Gain will need to be demonstrated for any new planning application submissions from early 2024. residential development not benefiting from the Certificate of Lawfulness.	Ecology chapter, and the original text is factually correct, so will remain.	
Brooke Marine - MP Associates	Page 19- Brooke Yachts and Jeld Wen Mosaic County Wildlife Site Notwithstanding the consented scheme the only acceptable loss of any parts of the CWS will be for creating essential roads and/or paths through the site.	A nuancing of the text is appropriate, as the existing consent does allow for some loss of the CWS. The text will be altered to make the situation clearer.	Alter text to say: <i>"The consented scheme allows for some loss of parts of the CWS. However, it appears that this scheme is not viable. In an alternative scenario, the only acceptable loss..."</i>
Brooke Marine - MP Associates	Page 20- Biodiversity Net Gain It may also be required for any new development on the Brooke Marine site, despite the extant 2015 planning permission. The position on the Brooke Marine site, with the extant planning permission from 2015, is more complicated and this will need to be explored in more detail and agreed separately with the Council.	It is agreed that Brooke Marine has an extant planning permission (DC/13/3482/OUT) and so biodiversity requirements will need to be explored separately.	Add text at the end of paragraph 1 to say: <i>"...2015 planning permission. As the situation is complicated, it will need to be explored in more detail and agreed with the Council."</i>
Respondent Name	Comment (submitted as a separate document)	Council Response	Action
Sanyo Site - GP Planning	The Council could consider promoting a Local Development Order for some or all of the SPD area.	Whilst an LDO is not ruled out completely, as	No changes.

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight , proposed text to delete struck out .)	Council Response	Action
		a complicated mixed-use site with various significant constraints (including Habitats Regulations matters and contamination amongst others), it is considered very unlikely that an LDO would be appropriate.	
Sanyo Site - GP Planning	There is uncertainty as to the status/weight of the Planning Position Statement (PPS).	It is not a Local Plan document, nor an SPD. The precise weight to be afforded to it will be a matter for the decision-maker.	No changes.
Sanyo Site - GP Planning	The PPS contains some inconsistencies in relation to the language used.	The Council will attempt to remove inconsistencies.	Appropriate changes to be made.
Sanyo Site - GP Planning	The map should be updated to include land owned by Associated British Ports.	This will be included.	Update map to include ABP land on both sides of Lake Lothing.
Sanyo Site - GP Planning	Suggested additions to the key changes- <ul style="list-style-type: none"> The tidal barrier no longer being proposed. Adoption of the Healthy Environments SPD. Updated Flood Risk Policy (NPPF) and updated flood maps (2025). 	As the barrier was not allowed for in the Waveney Local Plan, it will not be included. However, the other two	Add in the adoption of the Healthy Environments SPD and updated flood risk

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight , proposed text to delete struck out .)	Council Response	Action
	Financial viability has decreased significantly as a consequence of the above.	matters are relevant and will be included.	information and matters.
Sanyo Site - GP Planning	Housing Housing densities should be flexible, site specific and of varying heights. Requirement for custom/self-build should be across SPD area.	It is agreed that this is the case but neither need to be stated explicitly, as they are set out in the existing SPD and Local Plan.	No changes.
Sanyo Site - GP Planning	Affordable Housing The ability to meet the affordable housing requirement will depend on costs/viability.	This is obviously correct, but no changes need to be made as the challenging viability is already recognised.	No changes.
Sanyo Site - GP Planning	Specialist/retirement accommodation This requirement is supported. Reference to links through the site is misplaced here.	What is meant here is strong links etc through any specialist/retirement accommodation specifically and this will be clarified.	Alter the text to say: <i>"...including through the specialist/retirement site and to..."</i> .
Sanyo Site - GP Planning	Primary School and Pre-school <ul style="list-style-type: none"> It is unclear if requirement for the primary school has fallen away, if so the word 'may' should be deleted. No evidence in the draft PPS to support requirement of new pedestrian crossings and no indication of a trigger. 	<ul style="list-style-type: none"> The primary school need has indeed fallen away and so the text will be altered 	<ul style="list-style-type: none"> Alter text to delete "may" No changes Minor re-wording has been done

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight , proposed text to delete struck out .)	Council Response	Action
	<ul style="list-style-type: none"> • The trigger will be proportionate to the sites, and it would not be acceptable that the requirement would be split across land parcels. • The level of early years provision is not justified. The additional peak trips created would not be attributable to the development on the sites. If there is a local requirement, the provision would need to be proportionate to the development. • It is unclear how/when places will be delivered by SCC. • Requiring land to be free from contamination should be rephrased. 	<ul style="list-style-type: none"> • This is required to enable safe home to school travel (primary and high), as there are no crossings at present, apart from the new crossing close to the Gull Wing bridge • Each of the three large sites needs to provide an Early Years site, to ensure that, at worst there is a fallback position. It is accepted that the precise need and size will need to be refined at the planning application stage 	<ul style="list-style-type: none"> • Detailed text has been deleted.

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight , proposed text to delete struck out .)	Council Response	Action
		<ul style="list-style-type: none"> Although it is necessary (to ensure that Suffolk CC does not incur additional expense of decontaminating a site), the details of the site requirements will be deleted, and replaced with a statement referring to the SCC Developers' Guide (which contains all their requirements). 	
Sanyo Site - GP Planning	Open Space/Play Space <ul style="list-style-type: none"> No reference to the Healthy Environment SPD. There is no justification for the MUGA or locating it within the Sanyo site and uncertainties mean it may be inappropriate. Open/play space figures vary and need to be checked. 	<ul style="list-style-type: none"> The Healthy Environment SPD will be mentioned The specific reference to a 	<ul style="list-style-type: none"> Add a mention of the HE SPE Broaden the text by referring to "provision to

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight , proposed text to delete struck out .)	Council Response	Action
	SANG should refer to table 15 matrix in the Healthy Environments SPD.	<p>MUGA will be deleted, and replaced with broader text</p> <ul style="list-style-type: none"> A reference to Table 2.1 of the HE SPD will be added (which contains the figures). 	<p>accommodate all ages”</p> <ul style="list-style-type: none"> Add a reference to Table 2.1 and Table 15 of the Healthy Environment SPD.
Sanyo Site - GP Planning	<p>BNG</p> <p>This paragraph should reflect the impact BNG will have on the viability of development. A flexible approach could be required on acceptable development and rigid must-have requirements.</p>	BNG is mandatory but it is recognised the overall site viability is challenging. Where compromises need to be made, BNG is an area where this may be very hard due to the specific legislation.	No changes.
Sanyo Site - GP Planning	<p>Jeld Wen</p> <p>The Jeld Wen proposal is not yet determined. If it is approved, and is not compliant with the PPS, other sites should not be expected to pick up any deficit.</p>	Each site will need to be considered on its own merits, within the broad context of the site as a whole. It is freely acknowledged that the site is very challenging to develop viably, so	No changes.

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight , proposed text to delete struck out .)	Council Response	Action
		some compromises on the Local Plan requirements will be necessary.	
Sanyo Site - GP Planning	<p>Brooke Marine It should be made clear that the Certificate of Lawfulness for the whole Brooke Marine site has been implemented and are capable, on paper, of being delivered. Key matters are set out for Brooke Marine, but it is unclear how these can be delivered if relying on implemented planning permission.</p> <p>It should be clear that the key matters relate to the Council's expectations if a new application is submitted.</p> <p>There are extant s.106 obligations relating to the management of the CWS.</p>	What is stated here is correct, and relevant changes to the text will be made to reflect the points. The Brooke Marine situation is complicated.	Text has been clarified that the Council's expectations for Brooke Marine are in the event of a new application being submitted.
Sanyo Site - GP Planning	<p>Sanyo/Survitec The Council purchased the site in 2016 The PPS should make it clear that there are no current proposals for the Sanyo site. Requirement for a pre-school setting is considered unnecessary. If requirement remains, a trigger point is required. Delivering a nursery as part of a mixed-use building would more appropriate than a single storey nursery building. Due to issues on the site, key matters should be less prescriptive and more flexible.</p>	<ul style="list-style-type: none"> An update to mention there are no current proposals can be added There is an existing deficit of pre-school places in the area and unless other provision 	<ul style="list-style-type: none"> A change has been made to reflect that there are no current proposals for the site No other changes made.


Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight , proposed text to delete struck out.)	Council Response	Action
	<p>Contributions to safe crossing points are not justified and only necessary if an assessment related to an application concludes this.</p> <p>There is no justification for a MUGA, this would be more justifiable on the Jeld Wen site.</p>	<p>can be secured elsewhere, a site needs to be made available</p> <ul style="list-style-type: none"> • Delivery of a mixed-use pre-school may be acceptable – the details can be discussed during pre-application engagement • Safe crossing points are necessary to ensure home-school walking routes can be delivered (as well as improving safe access for all ages). The details can be left to the individual 	

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight, proposed text to delete struck out.)	Council Response	Action
		planning application <ul style="list-style-type: none"> See above for the MUGA point. 	
Sanyo Site - GP Planning	Scenic Site Same points related to key matters above.		
Sanyo Site - GP Planning	Streets and Transport 'The Council' s reflections on WSPs findings relating to NPPF and level of severity seem unnecessary in the Draft' Disappointed that the waterfront path has been abandoned as this would have provided significant opportunities and increased desirability of the area for future residents. Public transport needs further consideration to ensure connectivity.	The waterfront path is not achievable as a single continuous path, due to various constraints. However, waterfront access remains an important matter, as set out in the Position Statement. The connectivity of all sites to public transport is important and will be discussed within every individual planning application.	Minor wording have been made to reflect the inability to secure the continuous waterside path.
Sanyo Site - GP Planning	Open Space, Biodiversity and GI Management obligations for the CWS should be included here and should set out extent of any LPA leverage.	There are no current management obligations for the CWS.	The proposed wording change has been made.

Respondent Name	Comment (Suggested changes - proposed new text in yellow highlight , proposed text to delete struck out .)	Council Response	Action
	<p>Any new permission on Brooke Marine will be caught by 10% Biodiversity Net Gain.</p> <p>In relation to the Sanyo site, preferred text for the final sentence of BNG paragraph would be-</p> <p>‘While the preference is to retain and, where possible enhance priority habitats, development proposals on each site will be determined on its merits alongside proposed mitigation, including the need to provide off-site mitigation where scheme viability is impacted by onsite BNG provision.’</p>	<p>The re-wording of parts of the BNG text are agreed as sensible.</p>	

Appendix 4: Draft Consultation Promotion Material

Facebook 3 April 2025


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Give your views on a new planning document which will help bring forward development at Kirkley Waterfront in Lowestoft!


We have prepared the draft Planning Position Statement for the Kirkley Waterfront and Sustainable Urban Neighbourhood which when finalised, will provide guidance to landowners and developers on the Council's position on key issues affecting development.

The document will be used to help make decisions on future planning applications on the site and to recognise any changes since previous guidance for the area was produced in 2013.

Kirkley Waterfront is a 60-hectare site on the south side of Lake Lothing which was identified for development in the Waveney Local Plan.

The area is a collection of mostly brownfield sites, including various former manufacturing and boat-building sites. It covers most of the south shore of Lake Lothing from Riverside Road in the east to Nelson Wharf in the west. The land is in multiple ownerships and some of the site has already been developed, but much remains vacant or underused.

Give your views on the draft Position Statement by 8 May:
<https://bit.ly/4jAQik3>



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Press release 3 April 2025

Have your say on Kirkley Waterfront planning document

Posted by on 3 April 2025 | Comments

Residents are invited to give their views on a new planning document which will help bring forward development at Kirkley Waterfront in Lowestoft.

Starting on Thursday 3 April, residents are invited to give their views on the draft Planning Position Statement for the Kirkley Waterfront and Sustainable Urban Neighbourhood, which has been prepared by East Suffolk Council.

When finalised, the Planning Position Statement will provide guidance to landowners and developers on the Council's position on key issues affecting development. The document will be used to help make decisions on future planning applications on the site and to recognise any changes since previous guidance for the area was produced in 2013.

Kirkley Waterfront is a 60-hectare site in central Lowestoft which was identified for development in the Waveney Local Plan. The land is in multiple ownerships and some of the site has already been developed, but much remains vacant or underused.

Cllr Mark Packard, East Suffolk's cabinet member for Planning and Coastal Management said:

"There have been significant changes in this area since the site was originally allocated for development in 2009, such as the completion of the Gull Wing bridge, however there has been limited redevelopment on the site so far.

"Kirkley Waterfront has the potential to become a vibrant place for local people to enjoy and the aim of the Planning Position Statement is to provide clear advice to landowners, developers and other key stakeholders on various issues and challenges, and to ultimately 'kickstart' the development of the site."

Kirkley Waterfront is the area on the south side of Lake Lothing and is a collection of mostly brownfield sites, including various former manufacturing and boat-building sites. It covers most of the south shore of Lake Lothing from Riverside Road in the east to Nelson Wharf in the west.

Give your views on the draft Position Statement.

The final Planning Position Statement is expected to be adopted later this year and will be used to help make decisions on planning applications.

During a consultation in March 2024, residents were asked for their comments about what should be included in the Planning Position Statement. These views have been considered during the development of the draft statement.

The five-week consultation closes on Thursday 8 May 2025.

Appendix 5: Responses to the Draft Planning Position Statement consultation

This table summarises the main issues raised in the consultation responses, the Council's response and how they informed the preparation of the final document. The full responses can be viewed at <https://eastsuffolk.inconsult.uk/KirkleyWaterfront2025/consultationHome>.

Name, organisation and agent	Comment Summary	Council Response	Change required
1st Oulton Broad Sea Scout Group (Alan Gosling)	<p>Respondent raises concerns that the traffic surveys, in relation to the Nelson Wharf access, have not accounted for the associated traffic from the hall usage. If the junction is to become busier, there is a risk of harm to young people arriving and departing the building.</p> <p>This section of road should be considered in the same way as a school.</p>	<p>The peak periods are assessed to understand the functionality of the road when it is likely under the most strain. If the road is able to function within capacity during these periods, then it is highly likely that it will be able to function adequately during off-peak times.</p> <p>Nelson Wharf is expected to operate well within capacity in all modelled scenarios.</p> <p>However, it is an expectation that each application will provide a detailed Transport Assessment for each individual site, when the proposed access arrangements would need to be explored in further detail with council officers and Suffolk County Council Highways officers. Potential 'conflicts' with the users of the hall – recognising that there will be children</p>	No changes made to the document.

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		arriving/leaving at some key times of the week, as stated – would need to be taken into account and (as appropriate) mitigated.	
Anglian Water (Tessa Saunders)	<p><u>Jeld Wen - Statuslist</u></p> <p>Anglian Water provided information and advice about not building over underground water assets, respecting easements for water assets, not having sewers in private gardens, and the need to apply to Anglian Water if the developer wants to divert any water assets. Anglian Water has guidance and policies on surface water drainage.</p> <p><u>Brooke Marine</u></p> <p>Anglian Water doesn't have any water assets in the site, but there is a pumping station nearby with an encroachment buffer. The developer is recommended to have pre-app engagement with Anglian Water.</p> <p><u>Sanyo / Survitec</u></p> <p>Anglian Water has a sewer and pumping station within the site. They provide information about easement strips, encroachment buffer zones,</p>	<p>Information and advice will be passed on landowners and developers.</p> <p>Reference to water efficient design and measures will not be added into the Urban Design Guidance chapter as this is addressed in the Waveney Local Plan. Local Plan policy WLP8.28 requires developments to achieve a water efficiency standard of 110 litre/person/day.</p>	<p>The sentence regarding the adoption of Sustainable Drainage Systems (SuDS) by an appropriate body has been amended as suggested to include reference to Anglian Water's adoption manual.</p>

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	<p>and the need to apply to Anglian Water if the developer wants to divert any water assets.</p> <p><u>Scenic (former SCA Recycling site)</u></p> <p>Anglian Water doesn't have any assets in the site. The developer is recommended to have pre-app engagement with Anglian Water.</p> <p><u>Urban Design Guidance</u></p> <p>Section could include reference to water efficient design and measures.</p> <p><u>Flood Risk Management</u></p> <p>Anglian Water agrees with need for flood risk assessments and would seek to ensure that flood risk is managed effectively. Anglian Water supports the section on green infrastructure, agrees with need for a comprehensive approach to SuDS, is pleased the foul drainage strategy will need to be agreed with them, and support the reference to updated flood maps.</p> <p><u>Flood Risk Maps</u></p> <p>We would request that the sentence regarding the adoption of SuDS by an appropriate body (such as Anglian Water) is amended to include:</p>		

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	<p>"following the requirements in their adoption manual".</p> <p>https://www.anglianwater.co.uk/siteassets/developers/drainage-services/aws-suds-guide-sm.pdf</p>		
Alsop, Mr & Mrs	<p>Strongly objects.</p> <p>Believes housing to the rear of his property, particularly affordable housing, would result in a variety of anti-social behaviour.</p> <p>They want peace and quiet and would prefer retail or similar development</p>	<p>The Council does not agree with the respondents that the proposed development, including affordable housing, would inevitably result in antisocial behaviour and crime. A high-quality development is sought that will enhance the character of the town.</p>	<p>No changes made to the document.</p>
Alsop, Mr & Mrs	<p>Concerned the development will disturb asbestos in the ground and create a danger to residents.</p> <p>Wants the alley behind their house tarmacked.</p>	<p>There are rules and regulations on managing and working with asbestos. Local Plan policy requires a full site investigation report assessing the risk of ground contamination be submitted with any planning application.</p> <p>The alleyway is not a public highway and so the tarmacking of a private road/alleyway would be the responsibility of the owner(s). This is not a Planning</p>	<p>No changes made to the document.</p>

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		Policy issue and so falls outside the scope of this document.	
Associated British Ports Katherine Snell	<p>ABP broadly supports the Council's ambition to strengthen Lowestoft's economy through redevelopment.</p> <p>This response builds on response to previous consultation in April 2024.</p> <p>Port of Lowestoft is a key facility supporting numerous industries.</p> <p>In accordance with national policy, the port needs to operate 24 hrs a day, 7 days a week.</p> <p>ABP does not consider that the position statement identifies key issues.</p> <p><i>The relationship of the Kirkley Waterfront area and the Port of Lowestoft</i></p> <p>ABP is concerned that considering the close proximity of the port to the Kirkley Waterfront site, that the PPS only makes one reference to the port.</p> <p>ABP is surprised that the relationship to the Port of Lowestoft is not mentioned in the 'Key</p>	<p>The Council acknowledge and agree with the comments made by ABP; the Council shares the concern that operational port activities must not be put at risk through inappropriate nearby development.</p> <p>This has been addressed more clearly by adding new text into the section on Key Matters.</p> <p>Applicants are also encouraged to engage directly with Associated British Ports prior to the submission of a planning application and this is included in the new text.</p>	<p>A new section titled 'Protecting port operations' has been added into Key Matters. The new text addresses the concerns raised by ABP by requiring any waterfront uses, connectivity to the waterfront and views of the lake must be compatible with port operations and not hinder the 24-hour, 7-day a week operation.</p>

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	<p>Matters' section for the Brooke Marine and Jeld Wen sites.</p> <p>ABP explains their interpretation of the 'agent of change' principle, making reference to relevant NPPF section.</p> <p>Concerned that PPS is inward looking and overlooking the impact on the Port.</p> <p>PPS suggests employment should be on north of Jeld Wen but does not take similar approach with the Brooke Marine site. It only sets out Council's preference for the site, not the position if the current permission were implemented on the Brooke Marine site.</p> <p>The PPS makes reference to taller buildings on the waterfront, which may give rise to complications due to Port activities.</p> <p>PPS mentions Lake Lothing as a focal point, access to the waterfront and waterfront views- this will require careful consideration.</p> <p>If the previous schemes are not likely to go ahead, the PPS should guide this 'different redevelopment' but this guide would not be effective in protecting port operations as it</p>		

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	<p>does not include port activities within the key priorities.</p> <p>Summary</p> <p>Statutory nature of the Port and responsibility of developers to avoid impacting operations needs to be expanded and strengthened in PPS.</p> <p>As PPS will be used to make decisions, these relationships and expectations need to be clearly represented in the PPS.</p> <p>ABP suggests that it is made clear that developers should engage with ABP during pre-app process. In ABP's experience this is beneficial for the form of development and the application process.</p> <p>ABP welcomes the opportunity to work proactively with all parties before any further applications are submitted/decided across the Kirkley Waterfront site.</p>		
Barratt, Sara	Encouraged by the prominence of green space and consideration for the existing natural environment and wildlife populations.	Support is appreciated.	No changes made to the document.
Baxter, Tony	Agree with the overall need to redevelopment the waterfront area.	Support for the overall development is appreciated.	No changes made to the document.

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	<p>Concerned about housing, particularly affordable housing, on the Sanyo site. Wants to know what affordable housing means and is concerned about the type of person it will attract, issues of antisocial behaviour, crimes and declining property values.</p> <p>Also concerned about rumours of asbestos in the land, noise during construction, access to this home during construction, and adequate road structure.</p> <p>Query whether they are entitled to compensation for the inconvenience.</p> <p>Questioned building when there is a risk of flooding.</p> <p>Would prefer the site is used for business or entertainment to attract tourists to the town.</p>	<p>The Council does not agree with respondents that the proposed development, including the affordable housing, would inevitably result in antisocial behaviour and crime. A high-quality development is proposed that will enhance the character of the town.</p> <p>There are rules and regulations on managing and working with asbestos. The Local Plan policy requires a full site investigation report assessing the risk of ground contamination be submitted with any planning application.</p> <p>Any noise from the construction would be temporary and doesn't warrant leaving the site undeveloped.</p> <p>A Transport Access Study was carried out recently (and is available on the Council's website) to ensure the roads could handle the additional traffic from the redeveloped site. But in any case, each site will need to prepare a Transport Assessment or similar to</p>	

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		<p>demonstrate how the transport matters will be addressed in detail.</p> <p>Residents are not entitled to compensation when neighbouring or nearby land is developed.</p> <p>There is a dedicated chapter on Flood Risk Management that addresses the need for flood resilience and mitigation, including land-raising (to take land out of the highest risk flood plain).</p>	
Belsey, Tony	Get on with it and stop wasting time.	The Council wants to see the re-development occurring as soon as possible too, and the Planning Position Statement will hopefully assist with the process.	No changes made to the document.
Charge, Sally	<p>Considers the proposals an exciting approach. Welcomes plans for safe cycle routes, biodiversity, shoreline, housing and recreation. References Riverside in Norwich and Ipswich as successful developments.</p> <p>Notes the flood is a big concern and wants to see innovative housing designs to address flooding.</p>	<p>Support for the proposals is appreciated.</p> <p>There is a dedicated chapter of Flood Risk Management that address the need for flood resilience and mitigation, including land-raising.</p>	No changes made to the document.

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	Is proud to be a Lowestoft resident.	There is a dedicated chapter on Urban Design; innovative housing design would be supported.	
Clarke, Carole	Respondent suggests that a new doctor's surgery is included. More residents will worsen shortage of appointments.	A GP surgery is not a planning policy requirement for this site and the Norfolk and Waveney Integrated Care Board has not requested a new GP surgery on this site. Challenges seeing a GP are recognised but are not a land use issue that can be addressed through planning.	No changes made to the document.
Coote, Kevin	The respondent has identified areas that should be left for wildlife and notes that there are insects, lizards, mammals, and birds including kingfisher which use the sandy banks at the edge of Lake Lothing to nest in. The former playfield could be a wildflower meadow and the existing wildlife area should be left undisturbed.	The development must comply with biodiversity legislation and provide a minimum 10% biodiversity net gain (BNG). The document has a dedicated chapter on Open Space, biodiversity and green infrastructure which supports wildlife.	No changes made to the document.
De Brea, Robin	The section on flooding is indecipherable without professional expertise. The respondent wants to understand the flood risk of the thousands of residents across the town impacted by the lack of a flood barrier.	The document is aimed at landowners /agents /developers for the site. The purpose of the document is to assist in the submission of planning applications and delivery of the site. It is necessary to provide landowners /agents /developers with technical information.	No changes made to the document.

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		<p>Some information in the document may therefore require professional expertise to understand.</p> <p>It is outside the scope of this document to address flooding issues for wider town.</p> <p>The document is focused on supporting the development of the allocated site and mitigating flood risk for the site, without increasing the flood risk to the surrounding area.</p>	
East Suffolk Council (Maureen Darrie – GP Planning)	<p>The respondent represents East Suffolk Council as landowner of the Sanyo site and noted East Suffolk Council’s responses to their previous comments to the first consultation. They consider the opportunity remains for a Local Development Order (LDO) for some or all of the Kirkley Waterfront SPD area which would provide advantages to developers.</p> <p>There is uncertainty surrounding the status of the document, in planning terms, and the weight that will be afforded to its contents in the planning balance.</p>	<p>A Local Development Order (LDO) is not considered appropriate for such a large, mixed-use site with such complex issues and challenges to address. LDOs in the Waveney Local Plan area haven’t been successful in delivering development on allocated sites. They also take quite a lot of time and resource to prepare.</p> <p>The document doesn’t need to state at the introduction that it is high level and flexibility is key – this is mentioned at various points in the document already.</p>	<p>“Key Changes since adoption of the SPD” updated as suggested.</p> <p>Land Uses – Issues</p> <p>The text had been updated to specify the built form should be 50-90 dwelling per hectare to give flexibility to the rest of the land uses.</p>

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	<p>The Introduction should expressly state the high level nature of the document and the in-built flexibility referred to in the Council's response to our previous comments.</p> <p>The key matters for each site contains confusing language. This does not promote a flexible approach to site development. The stringent requires could potentially frustrate viable development.</p> <p>Amendments to Map 1 welcome.</p> <p>"Key Changes since adoption of the SPD" should reference:</p> <ul style="list-style-type: none"> • The tidal barrier no longer being proposed • The adoption of Healthy Environments SPD, 2024 • Updated Flood Risk Policy (NPPF 2024, paragraph 182), updated flood maps (March 2025), and • Financial viability has decreased significantly as a consequence of the above <p><u>Land Uses – Issues</u></p> <ul style="list-style-type: none"> • Densities should be expressed as flexible and site specific. 	<p>Appreciate that the amendments to Map 1 are welcomed.</p> <p>The Council agree that "Key Changes since adoption of the SPD" should be updated.</p> <p>The Key Matters text contains a combination of Local Plan policy requirements, other requirements (e.g. BNG) and other matters that should be addressed appropriately. The text therefore needs to be viewed in the round – some elements will be non-negotiable, but others may/will have more flexibility.</p> <p>Land Uses – Issues</p> <ul style="list-style-type: none"> • The text mentions 50-90 dwelling per hectare. This has been updated to specific the built form should be at this density. Site-specific densities have not been provided as we want to retain a flexible approach. • Due the lack of significant cooperation between landowners and developers, such as masterplanning and coordination of 	<p>Text on land contamination changed from "mitigation" to "remediation".</p> <p>Text added under Streets and Transport, East-West Cycling, Walking and Wheeling route,</p> <p>" , including areas largely already developed such as Riverside"</p> <p>"In addition, it is expected that the route will connect into the new Gull Wing Bridge on the east side which will improve wider connections to services and facilities north of Lake Lothing."</p> <p>Map to be adjusted to show line to Gull Wing</p> <p><u>Open space</u></p>

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	<ul style="list-style-type: none"> Varying heights are welcomed. The requirement for self/custom built should be across the SPD area. <p><u>Affordable Housing</u></p> <ul style="list-style-type: none"> The ability to meet the requirement is dependent on costs and viability. The text about affordable housing being reduced levels through a viability assessment is welcomed. <p><u>Specialist/retirement Accommodation</u></p> <ul style="list-style-type: none"> This requirement is welcomed. Further guidance on location would be welcomed to avoid a commitment on the later parcels of land to come forward. Reference to links through the site still seems misplaced in this paragraph. <p>Primary School and Pre-school</p> <ul style="list-style-type: none"> Clarification that the primary school is no longer needed is welcomed. 	<p>delivery, it is necessary that each parcel of land independently meets the requirements of the Local Plan. The requirement for self/custom build cannot be aggregated across the whole of the allocated site.</p> <p>The comments on affordable housing are appreciated.</p> <p>The comments on Primary School and Pre-school are appreciated.</p> <p>Specialist /retirement</p> <ul style="list-style-type: none"> No location has been given to provide developers with maximum flexibility to provide financially viable and appropriate residential development Reference to the need for pedestrian, cycle and transport links within and surrounding the developments will be clarified 	<p>Add under Key Matters: “The Healthy Environments SPD (adopted in 2024) contains a lot of detail on the provision of open space and play space and should be referred to also, within the framework of the Waveney Local Plan and Kirkley Waterfront SPD. In particular, Table 15 and the associated sections of text should be consulted to as the standard requirements for greenspace and SANG, although some compromise of the Healthy Environment SPD’s standards will likely be needed on at least some of the individual sites due to viability concerns.”</p> <p>Reference to the Sanyo site needing to deliver</p>

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	<p>New pedestrian crossings.</p> <ul style="list-style-type: none"> There is no evidence to support requirement for three crossings and no indication of what will trigger will be. If the requirement is split across land parcels this would not be acceptable in planning terms. <p>Early years provision</p> <ul style="list-style-type: none"> One on each site is not justified, is not sustainable in planning terms and would encourage additional vehicle trips in the peak. The provision on each site should be proportionate to the proposed development. It is not clear how it will be delivered by SCC, or when. <p>Land contamination</p> <ul style="list-style-type: none"> The requirement for the land parcels to be free from contamination should be rephrased to state remediation or civilisation which would allow a range of alternatives to be considered. 	<p>Early Years provision</p> <ul style="list-style-type: none"> Due the lack of significant cooperation between landowners and developers, such as master planning and coordination of delivery, it is necessary that each parcel of land independently meets the requirements of the Local Plan and SCC's requirements therefore each site should provide land for an Early Years setting. The precise size and location will be agreed in discussion with the Council and SCC The Early Years provision must be adequately sized to help meet the needs of the wider Kirkley Waterfront site, if this is necessary; Details of how the early years provision will be delivered by SCC must be secured through a S106 legal agreement. The SCC Developers Guide sets out more details on this process. <p>New pedestrian crossings</p>	<p>recreational and green space has been added to the Open Space section in Chapter 5 – this had been inadvertently omitted.</p> <p><u>Brooke Marine</u></p> <p>Delete the largely repeated text in para 4: “A Certificate of Lawfulness application was granted in 2024 (reference DC/24/0490/CLE) such that it was confirmed that the permission had been lawfully implemented, following the approval of reserved matters for Phase 1.”</p> <p><u>Sanyo</u></p>

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	<p>Open Space/Play Space</p> <ul style="list-style-type: none"> The stated requirements in this section do not flow through the Draft PS. Reference is made to Policy WLP2.4 but not to Healthy Environments SPD requirements. The removal of MUGA on the Sanyo site is welcomed. SANGS should reference Table 15 matrix in Healthy Environments SPD and also include reference to the Open Space Methodology and Play Provision sections. The document is unclear on the open space and details are required. Page 29 only relates to Jeld Wen and Brooke Marine. <p>Biodiversity Net Gain</p> <ul style="list-style-type: none"> BNG will impact development viability, so flexibility is needed for other requirements. Development proposals will be determined on its merits alongside proposed mitigation. <p>Local Retail Core</p>	<ul style="list-style-type: none"> The need for new pedestrian crossings of Waveney Drive/Victoria Road is clear, to ensure that there are safe walking and cycling routes to local schools. Due the lack of significant cooperation between landowners and developers, such as master planning and coordination of delivery, it is necessary that each parcel of land can independently deliver appropriate crossing points. It is therefore necessary for each parcel of land to be required to provide a crossing to mitigate the impact its developments, as people simply will not walk longer distances to cross the road where there is a proper crossing. (At present, there is a signal-controlled crossing by the Gull Wing bridge, but no other formal crossing points). If any Transport Assessments show, to the satisfaction of the Highway Authority, that a (further) crossing point is not necessary, then it could be that the requirement will fall away, but that cannot be 	<p>Change text to say: "There are no current definitive proposals for the site."</p> <p><u>Riverside Business Park</u></p> <p>New text detailing more information about this part of the Kirkley Waterfront has been added to Chapter 2</p>

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	<ul style="list-style-type: none"> The sites are required to provide improved walking and cycling infrastructure which we should fully support. Need to show Homes England how the project fits in with the wider town. There is no need or demand for additional retail. <p>Jeld Wen/Statuslist</p> <ul style="list-style-type: none"> The site is subject to a current planning application. If the application is determined favourably and it is not consistent with the Position Statement, then the other sites should not be required to pick up any land use quantum deficit. <p>Brooke Marine</p> <ul style="list-style-type: none"> Confirmation on the planning status of the site is welcomed. There is duplication in paragraphs 3 and 4. It is not clear how the key matters can be delivered if the landowner continues to rely on the implemented planning permission. 	<p>guaranteed and so a fallback position must remain.</p> <p>It is agreed that the Statement could make greater reference to forming a connection between the east-west cycling/walking route and the new Gull Wing Bridge as well as the Riverside area more broadly.</p> <p>The Position Statement balances the desire for waterfront access with the operational constraints of employment along the quay side, plus the presence of the (private) marina. Access points to the waterfront would be supported to provide views of Lake Lothing.</p> <p>Bus connectivity was carefully considered during the production of the Statement to ensure appropriate provision. A bus link through the site as a whole is simply – regrettably – not practicable.</p>	

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	<ul style="list-style-type: none"> • This section now makes it clear that the key matters relate to the Council's preference for the site now, should further redevelopment be applied for. • It is understood there are extant CWS obligations under a S.106 Agreement relating to its management. • It is unclear why there is a change to retain employment land or how the demand for additional water side space been calculated. This is the only site which can provide waterfront homes not impacted by the port on the Northern side of the lake. The current usage of the site is poor and does not fit in with the overall aspiration of the development. No matter what the future usage of the site is, considerable investment is needed, raising questions over deliverability. • The development at Jeld Wen could provide an opportunity for the minimal marine based organisation to relocate. <p>Sanyo/Survitec</p>	<p>Agree with comment on land contamination and the change to "remediation" will be made.</p> <p><u>Open space, playspace and SANG</u></p> <p>References will be added to the Healthy Environments SPD, to the Sanyo site needing to deliver open space and playspace in the chapter on Open Space and in relation to SANG provision</p> <p>In relation to BNG, the potential impact on viability is recognised – it is one of many such factors – but no further changes are needed to the text as this is already highlighted as an issue.</p> <p><u>Jeld Wen</u></p> <p>Each application will need to be judged on its own merits. If it is not proposed to meet the full requirements, it would</p>	

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	<ul style="list-style-type: none"> The text should make it clear that there are no definitive proposals for the site at this time, after reference to preapplication engagement. The requirement to provide equal play space across the 3 sites seems unjustified given the difference in size and the number of homes to be delivered. The 400m² of play area and 1800m² of open space could impact future viable and should be based on the number of homes provided. <p>Early Years Provision</p> <ul style="list-style-type: none"> Clarity is needed to address this in advance of the development. Potential opportunities could include Colville House or East Point Academy. Equally provision across the 3 main sites seems unjust. The requirement for a 30 place pre-school setting is unnecessary. An appropriate trigger point is required for provision is needed. 	<p>not be expected that other sites would automatically have to pick up any 'slack', as the Council recognises the considerable viability challenges.</p> <p><u>Retail</u></p> <p>Some retail provision is required as part of the WLP policy, although it is recognised that the retailing picture has changed significantly and that the demand for units has in all likelihood fallen (although not completely).</p> <p><u>Brooke Marine</u></p> <p>Paragraph 4 of the section will be deleted, due to effective duplication.</p> <p>It is recognised, of course, that if the current permission for the site is built out in full, then some of the requirements of the Position Statement will be unlikely to be met. However, the Council remains of the view that it is at</p>	

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	<ul style="list-style-type: none"> It is onerous given the viability is already tenuous. A nursery as part of a mixed use building would be much more appropriate as a single storey nursery building is an inefficient use of land. Key matters should be less prescriptive and more flexible to allow viable development. The requirements for crossing points are justified and will only be necessary if assessment work related to an application concludes that is the case. <p>Scenic Site</p> <ul style="list-style-type: none"> Points related to key matters are the same as addressed above. <p>Riverside Road Commercial Site</p> <ul style="list-style-type: none"> Support for development within B2, B8 and E class, but Position Statement lacks reference to the relationship between Riverside Road and the remainder of the 	<p>best uncertain that the development will be completed as per the 2015 permission.</p> <p>It is agreed that the current employment space at Brooke Business Park is not necessarily of the highest standard, but it is cheap to rent and so therefore helps meet a local need.</p> <p><u>Sanyo</u></p> <p>Minor re-wording to make clear that there are no definitive proposals for the site.</p> <p>The quantum of open space is stated as being the same for each individual site, to try to ensure that viable spaces are produced and for simplicity. The details will be best explored through pre-application and application discussions. It may be that a lower amount could be agreed, as some high quality open</p>	

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	<p>site. Should have explicit reference to linkages.</p> <p>Streets and Transport</p> <ul style="list-style-type: none"> It is disappointing that the waterfront path has been abandoned. There are opportunities for opening up the waterfront and increasing the desirability of the area for future residents. Further consideration should be given to public transport with the site. <p>Open space, biodiversity and GI</p> <ul style="list-style-type: none"> Management objectives seem predicated on landownership and extant obligations. The extent to which the LPA has any leverage should be set out. 	<p>space/playspace might help overcome any quantitative deficit.</p> <p>In relation to the Early Years requirements, the details will need to be negotiated with Suffolk County Council. It might be possible for the Early Years setting to be part of a broader building, but again this would need to be discussed.</p> <p><u>Riverside</u></p> <p>A new section will be added to Chapter 2 of the Position Statement with information about this part of the site</p>	
Environment Agency (Andrew Thornton)	<p>Flood risk</p> <ul style="list-style-type: none"> Recommend updating the Cumulative Impact Assessment study (2008) to support planning requirements and assessment of land raising. <p>Future flood risk in the absence of land</p>	<p>Whilst the Cumulative Land Raising Study is now somewhat dated, the need for this would be more appropriately considered through the preparation of the forthcoming East Suffolk Local Plan. The individual land parcels will need to consider flood risk matters</p>	<p>Change the “Priorities” text to: “ Residential land must be safe from tidal flooding (through land-raising if necessary), with a Flood Risk Assessment demonstrating how the</p>

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	<p>raising and defences Updated FMfP and NaFRA2 information</p> <ul style="list-style-type: none"> Updated Freeboard guidance from 300 mm to 600 mm Surface water considerations <p>Further, more general comments are mostly related to updated policy/guidance, which include:</p> <ul style="list-style-type: none"> FRAP advice Land raising observation – regarding cost Since the previous consultation, multiple NPPF/PPG paragraphs have changed. <p>Flood risk omissions and recommended change referring specifically to the Kirkley Waterfront Planning Position Statement:</p> <ul style="list-style-type: none"> Replacement wording provided for paragraph on page 9, 11, 13 and 14 relating to residential land at risk of tidal flooding. Replacement wording provided for the section on Sustainable Design on page 30. On page 31 beginning “Significant parts of the site are within Tidal Flood Zone 3.....” and “Climate change and associated sea-level rise...”. Both paragraphs need to be 	<p>appropriately, including with regard to neighbouring areas.</p> <p>Agree to update the text on residential flood as requested in the “Priorities for each site” to highlight the need to mitigate potential impacts on nearby land.</p> <p>Agree to revise the text in the Urban Design chapter, as requested.</p> <p>Agree to make the other changes/updates, as requested, except:</p> <ol style="list-style-type: none"> 1) Minor re-wording to the text on the freeboard allowance, to make clear that there is no expectation that a 600mm freeboard allowance must be made – 300mm will be sufficient 2) The text on the Agency’s move to Flood Risk Activity Permits will not be included in the Position Statement, as it is not 	<p>land could be occupied and accessed/egressed safely. Flood Hazards must not increase to the detriment of third parties, following the modification of ground levels and floodwater flow paths (overland or surface water).”</p> <p>Change the Urban Design text on flood risk to say:</p> <p>“East Suffolk Council declared a climate emergency in 2019 and is committed to reducing carbon emissions and to encouraging communities to help manage climate change. Developments with energy efficient buildings that</p>

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	<p>updated with the outcomes from the new Flood Map for Planning (FMfP) and National Flood Risk Assessment (NaFRA2) products.</p> <ul style="list-style-type: none"> • Replacement wording provided for paragraph on page 31 beginning “Significant parts of the site are within Tidal Flood Zone 3.....” • On page 32 there is reference to a 300 mm freeboard and the National Flood Risk Standing Advice was updated and recommends working to a higher freeboard value of 600 mm. The Environment Agency is satisfied that the 2018 coastal modelling in this location can support and justify the lower freeboard value of 300, but they recommend the developers work to the higher freeboard level to improve flood resilience. • Text for an additional paragraph is recommended for page 32 in the section titled Flood resilience and mitigation. It relates to the ESC SFRA Level 2 (2018), section 3.3.2, as well as PPG paragraphs 068 and 0.69. • For text on page 32 regarding Land raising the Environment Agency strongly advises 	<p>specific to the area. It will, however, be communicated to applicants/pre-applicants</p> <p>3) The text on water efficiency will not be added, as the Waveney Local Plan already requires an elevated standard of efficiency</p>	<p>minimise carbon emissions are strongly supported. Developments must consider present-day and future flood risk by reflecting the aims of the policy paragraphs in Section 14 of the NPPF when developing climate resilient designs for the lifetime of all developments. Some of the information in the Kirkley Waterfront SPD regarding sustainable design has been superseded by Building Regulations and Local Plan policy, especially on energy efficiency”</p> <p>A new section on “Soils, groundwater and contaminated land” has been added to Chapter 2 to</p>

Name, organisation and agent	Comment Summary	Council Response	Change required
	<p>the LPA to consider a refresh of the Cumulative land raising study. If the Cumulative land raising study from 2008, is used to support land raising in the area, the flood risk to the site may be underestimated and underrepresented which may undermine future assessments of flood risk.</p> <ul style="list-style-type: none"> • Replacement text recommended for first paragraph on page 33 regarding neighbouring properties and surface water drainage. <p>General comments</p> <p><u>FRAPS</u> Environment Agency FRAP guidance has been updated as follows with details and web link provided.</p> <p><u>Land Raising</u> The Council could consider the comparative costs of land raising compared to the costs of flood defences, and if less costly, whether collectively it would benefit developers to contribute towards a defence project. The re-working of the 2008 Cumulative Land Raising Study would be a good starting</p>		<p>reflect the Agency's requested text</p>

Name, organisation and agent	Comment Summary	Council Response	Change required
	<p>point for looking at the respective economics for both options.</p> <p><u>Groundwater and Contaminated Land</u> The Environment Agency is satisfied with the information provided and support the opportunity to redevelop the brownfield land. It is an opportunity to improve ground and water quality in the area.</p> <p>Some additional notes:</p> <ul style="list-style-type: none"> • There are areas of potential land contamination in the plan area. A land contamination assessment will be required for much of the area and this should consider risks to the water environment. • Sustainable use of soils should be considered at the strategic stage. • The use of deep foundations should consider the risks to the water environment prior to any designs being developed. • The use of infiltration may be limited, and any development should consider our SuDS. 		

Name, organisation and agent	Comment Summary	Council Response	Change required
	<p>Water Resources</p> <ul style="list-style-type: none"> • It is one of the driest areas of the country and is under pressure from potable water demand. • New developments should contribute towards reducing water demand and mitigate against the risk of deterioration to our rivers, groundwater and habitats from groundwater abstraction. • Development should achieve 110 litres per person per day as set out in the Building Regulations &c. (Amendment) Regulations 2015. • 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 or from underground strata will require an abstraction licence and there is no guarantee that a licence will be granted. 		

Name, organisation and agent	Comment Summary	Council Response	Change required
Field, Darren	Respondent's uncle previously worked in the building and thinks it should be demolished to build new houses. This will prevent arson incidents and help the homeless.	Agree with the respondent and the document should support the redevelopment of the site.	No changes made to the document.
Goldsmith, Ellie	Respondent is concerned that the influx of population will further impact the ability for local people to get doctor, dentist and NHS appointments.	A GP surgery is not a planning policy requirement for this site. The Norfolk and Waveney Integrated Care System (formerly the Norfolk and Waveney CCG) have not requested a new GP surgery on this site or in the Waveney Local Plan area. Any challenges seeing a GP are not a land use issue that can be addressed through planning.	No changes made to the document.
Harris, Richard	<p>Respondent says that the document is too complicated and difficult to understand.</p> <p>They think that this will limit the number of responses.</p> <p>Despite a desire to improve the site, this document will not provide constructive comments.</p>	This is a planning document primarily aimed at giving detailed, practical, technical planning policy information and guidance to the landowners, agents and developers of the site. The Council accepts that some of the information and guidance may be outside the knowledge of some members of the public and limit their ability to engage with the consultation. However, the information and guidance are necessary to assist landowners, agents and developers in bringing the site forward.	No changes made to the document.

Name, organisation and agent	Comment Summary	Council Response	Change required
Historic England (Andrew Marsh)	Historic England welcome the opportunity to comment but have no specific comments at this stage.	Comments noted.	No changes made to the document.
Howard, Keith	Respondent emphasises a need for a health centre/doctors surgery to accommodate new homes.	A GP surgery is not a planning policy requirement for this site. The Norfolk and Waveney Integrated Care System (formerly the Norfolk and Waveney CCG) have not requested a new GP surgery on this site or in the Waveney Local Plan area. Any challenges seeing a GP are not a land use issue that can be addressed through planning.	No changes made to the document.
Hudson, Helen	<p>Respondent says plans should not be watered down and must prevent traffic on Victoria Road.</p> <p>When attending a previous consultation event for the Brooke Marine and Sanyo site, attendees hadn't considered this issue.</p> <p>Respondent thinks that a doctor's surgery would be essential.</p>	<p>A Transport Access Study was carried out to ensure the roads could handle the additional traffic from the redeveloped site.</p> <p>There is a dedicated chapter on Streets and Transport in the document that addresses a range of issues.</p> <p>A GP surgery is not a planning policy requirement for this site. The Norfolk and Waveney Integrated Care System (formerly the Norfolk and Waveney CCG) have not requested a new GP surgery on this site or in the Waveney</p>	No changes made to the document.

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		Local Plan area. Any challenges seeing a GP are not a land use issue that can be addressed through planning.	
J&M Preservations (Mason Rutty)	<p>Respondent wanted to highlight their preservation work on historic buses and the difficulty in finding large storage facilities that are affordable.</p> <p>Without access to affordable storage, the preservation work will cease. This will put historical vehicles at risk.</p> <p>A lack of affordable storage puts a financial strain on preservationists and prevents others from entering the hobby.</p> <p>The respondent is concerned that this redevelopment will impact their access to affordable storage which enables them to carry out their restoration work.</p>	<p>East Suffolk Council support the work to preserve historic vehicles. The redevelopment of the Kirkley Waterfront is not intended to prevent the continued operation of existing businesses.</p> <p>The Brooke Marine site has outline planning permission for a residential development on the peninsular. However, this is thought unlikely to be built due to the financial cost of the proposals. The Council would support the peninsula remaining as employment land. The document makes this clear.</p>	No changes made to the document.
Leak, Dave	Respondent is supportive of redevelopment.	Support welcomed.	No changes made to the document.

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Lowestoft Town Council Planning Committee	<p>Land Use</p> <ul style="list-style-type: none"> The plans for housing need to consider land contamination and flooding in the area. The combination of light industrial and housing could cause issues for residents, such as noise disturbance. There is an opportunity to support the marine industry as part of the employment land development. <p>Streets and Transport</p> <ul style="list-style-type: none"> A cycle footpath connecting Waveney Drive to Oulton Broad would be welcome, if viable. A footpath from the Bascule Bridge along the waterfront to Oulton Broad by the Wherry Hotel would be a worthwhile and provide access to the shops, restaurants and cafes. <p>Flood Risk Management</p> <ul style="list-style-type: none"> Flood measures need to consider climate change projections and storm surges. <p>Open Spaces, Biodiversity and Green Infrastructure</p> <ul style="list-style-type: none"> There should be a wildlife corridor alongside the East-west cycling, walking and wheeling 	<p>Waveney Local Plan policy WLP2.4, the Supplementary Planning Document and this Position Statement require consideration of land contamination, flood mitigation, and residential amenity.</p> <p>The development can provide walking and cycling routes within the development and it is anticipated that the site will provide an east-west cycle route. Some of the route from the Bascule Bridge to the Wherry Hotel is outside the site and on private land and so cannot be easily delivered, but the Council supports improved cycling and walking connectivity such as this.</p>	No changes made to the document

Name, organisation and agent	Comment Summary	Council Response	Change required
	<p>route that connects to the County Wildlife Site.</p> <ul style="list-style-type: none"> Street trees would provide benefits, including shade provision, increased biodiversity, reduction of surface water runoff, mitigation of climate change and air pollution, and would provide a boost to the mental health of residents. 		
Mace, Derren	<p>Respondent is concerned that the town could not cope with the extra people. Services are already strained.</p> <p>Resulting traffic will cause more congestion and pollution and affect public transport.</p> <p>It could devalue homes.</p> <p>We need to encourage economic growth.</p> <p>Crime will increase.</p> <p>Homes will be allocated to illegal immigrants.</p> <p>Suggests increasing tourism offering.</p> <p>Respondent wants the people of the town to be thought of and will oppose the plans.</p>	<p>A GP and dentist surgery are not a planning policy requirement for this site. The Norfolk and Waveney Integrated Care System (formerly the Norfolk and Waveney CCG) have not requested a new GP or dentist surgery on this site or in the Waveney Local Plan area. Any challenges seeing a GP or dentist are not a land use issue that can be addressed through planning.</p> <p>A Transport Access Study was carried out to ensure the roads could handle the additional traffic from the redeveloped site.</p>	No changes made to the document.

Name, organisation and agent	Comment Summary	Council Response	Change required
		<p>The site has been allocated for development in the Waveney Local Plan, which was subject to public consultations and independent examination. The Position Statement does not seek to change Local Plan policy but provide extra guidance and information to assist landowners, agents and developers to bring forward the development.</p> <p>It is not accepted that the proposed development would result in antisocial behaviour, crime or the devaluing of property in the area. A high-quality development is proposed that will enhance the character of the town.</p>	
MP Associates Ltd (Michael Stannard)	<p>Page 3</p> <ul style="list-style-type: none"> • Photos 1 and 5 are misleading. • Photograph 1 should also be referenced with the words 'Certificate of Lawful Development' added. • DC/13/3482/OUT has been lawfully implemented and includes for the whole development. 	<p>Page 3</p> <p>Detailed reference to the Certificate of Lawfulness is made on page 10 and there is little benefit to adding additional information or maps on page 3 – the site area is shown on Map 1. However, there will be some re-wording</p>	<p>Change the title of photo 1 to say: "Outline planning permission on whole of Brooke Marine site, with Certificate of Lawful Development issued in 2024"</p>

Name, organisation and agent	Comment Summary	Council Response	Change required
	<ul style="list-style-type: none"> The map include with the 'Certificate of Lawful Development' should be added into the document <p>On page 5 the following paragraph should be deleted</p> <p>'As the situation is complicated, it will need to be explored in more detail and an approach agreed with the Council'</p> <p>Statutory legislation makes it very clear that if a planning application for a development was made before day one of mandatory BNG on 12 February 2024, the development is exempt from BNG.</p> <p>The Position Statement should not attempt to vary or complicate any such interpretation.</p> <p>On page 10 6th paragraph should be deleted and replaced with - <i>"Should the permitted high density residential development and implemented scheme on the northern promontory continue not to come forward, the council would support the site remaining as employment land. The main points below relate</i></p>	<p>to the descriptions of location 1 and 5 to clarify the situation</p> <p>Page 5</p> <p>Any non-material amendments and applications to vary planning conditions will not trigger biodiversity net gain. Any material amendments (or fresh applications), however, likely would and this is what was meant by the original text. The text will be refined to reflect this.</p> <p>As noted in the response, further detail is provided on page 11 so it is not needed on page 5.</p> <p>Page 10 and 11</p> <p>The Council remains of the clear view that the permission, as a whole – and particularly the high-density flatted scheme on the promontory – is not viable, as little evidence has been</p>	<p>Change the title of Photo 5 to say: "Proposed phase 1 of the Brooke Marine development (no completions yet on site)"</p> <p>Change the second and third sentences of the BNG paragraph to say: "The Brooke Marine site has an extant planning permission from 2015 and should the existing permission be delivered, or there are non-material amendments and/or variations of planning condition, then BNG cannot be required. If there are any material alterations, (or a fresh application is made), however, then BNG would be triggered. As such a situation could be complicated, it would need</p>

Name, organisation and agent	Comment Summary	Council Response	Change required
	<p><i>to the Councils preference for the site now – in other words a different development and newly submitted application. The current approved and implemented consent does not provide for or have any obligation to newly introduced policy requirements. The implemented development cannot cater for such significant and fundamental changes to the approved layout and designs.”</i></p> <p>On page 10 bullet point 1 should be reworded as follows - <i>“The permitted primary school is no longer required. However, a site of at least 0.22 hectares for a 30-place pre-school setting, expandable to 60 places, must be provided would be desired and must not be within the County Wildlife Site. It must The Council would like for it to be in an accessible location for the dropping off and collecting of children and also be in Flood Zone 1 (through land raising, if necessary).</i></p> <p>Page 11, 1st bullet point should be reworded as follows – <i>“Should the permitted high-density residential development on the northern</i></p>	<p>provided to demonstrate that it is deliverable, now 10 years after the consent was issued.</p> <p>Some minor wording changes will be made to clarify further that the Council cannot require changes to the existing consent and the same applies to the Biodiversity chapter (pages 24-25).</p> <p>On page 34, whilst there is no context to the photo of Brooke Marine, this doesn't matter – it is just a “filler” photo of somewhere on the Kirkley Waterfront site</p>	<p>to be explored in more detail with the Council.”</p> <p>Minor changes have been made to the Brooke Marine text on p10 to clarify that that the Council's (different) future vision for the site cannot be insisted upon. Similar minor changes have been made to the Biodiversity chapter.</p>

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	<p>promontory is now considered highly unlikely to be viable. The Council would support this remaining as employment land and most of the points below relate to this assumption.”</p> <p>On page 11 there should a second bullet point as follows – “The current approved and implemented consent, and the Section 106 Agreement attached to the consent does not provide a statutory obligation to provide or incorporate such newly introduced Policy requirements. The main point listed below therefore simply promote the Councils preference for the site.”</p> <p>On page 24 the 3rd paragraph should be reworded as follows – “The consented scheme allows for some loss of parts of the CWS. However, it appears that this scheme is not viable.”</p> <p>On page 25 the following should be deleted – “It may also be required for any new development on the Brooke Marine site, despite</p>		

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	<p>the extant 2015 planning permission. As this situation is complicated, it will need to be explored in more detail and agreed with the Council."</p> <p>On page 34 the photograph of the Brooke Business Park has no context.</p>		
Natural England (Alice Canning Tye)	<p>Natural England (NE) provided responses to the first consultation on the Kirkley Waterfront Development and the consultation for the planning application at the former Jeld Wen site (DC/24/2381/OUT).</p> <p>They attended a site visit with East Suffolk Council officers on 05 November 2024 and provided written advice following the visit. This response should be read in conjunction with their previous advice.</p> <p>Green Infrastructure (GI) NE recognises there are GI constraints across the site, and welcome the work done to deliver coherent mitigation across the site. NE support the inclusion of the East-West cycling, walking and wheeling route as a 'green</p>	<p>The advice is appreciated. Information on the Urban Greening Factor and the CIRIA guidance (susdrain.org) will be shared with developers.</p> <p>Any improvements to existing nearby greenspaces will be costed and secured through a S106 agreements.</p>	No changes made to the document.

Name, organisation and agent	Comment Summary	Council Response	Change required
	<p>route', and note it should be delivered as early as possible.</p> <p>The Urban Greening Factor (UGF) is recommended to measuring on-site greenspace. The recommended minimum UGF value for residential development is 0.4 and commercial development is 0.3, but the council cannot insist on this.</p> <p>NE support sustainable drainage systems (SuDS). These systems can be used to create wetland habitats for wildlife in an attractive aquatic setting and could be incorporated into the design. The CIRIA guidance (susdrain.org) provides useful information about integrating SUDs and biodiversity. The maintenance of SuDS should be provided for the lifetime of the project.</p> <p>Any improvements to any existing nearby greenspaces need to be costed and secured through a S106 agreement and secured at the outline application stage. NE advise that other suitable mitigation for the increased recreational disturbance should be secured at outline stage.</p> <p>Habitats Regulations Assessment (HRA)</p>		

Name, organisation and agent	Comment Summary	Council Response	Change required
	NE has provided advice on the draft HRA and their response still stands. They have no further comments to make in regard to the HRA.		
National Highways (Shamsui Hoque)	<p>National Highway's role is to maintain the safe and efficient operation of the Strategic Road Network. They are responsible for the A47 and B1532 in Lowestoft. The Kirkley Waterfront developments could potentially impact the A47 and the Bascule Bridge.</p> <p>Highways will expect a Transport Assessment and a Construction Traffic Management Plan to be submitted planning applications.</p>	<p>The submission of a Transport Assessment is a requirement both of the local plan allocation policy and the planning application Local Validation Checklist so will be expected with an application.</p> <p>The Local Validation checklist also states that the submission of a Construction Management Plan (which also includes elements of traffic management) is strongly encouraged to avoid the potential need for pre-commencement conditions.</p>	No changes made to the document.
Newson, Colin	<p>Respondent is supportive of the document and acknowledges the positive impact of the Gull Wing bridge and the regeneration of the seafront.</p> <p>They hope progress is not slowed down by political argument.</p>	Comments welcomed. The Council would like to see the re-development happen as quickly as possible too.	No changes made to the document.

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Nicholas Percival (Nancy Noble)	Nicholas Percival Limited are managing agents of the properties on behalf of Habendum Limited. They are concerned about continued access being maintained to properties via School Road. They want assurances that the development won't increase flood risk to surrounding properties.	Concerns are noted. Public highway access would be maintained and there is a dedicated chapter on flooding in the document – it is important that flood risks do not increase to adjoining land parcels.	No changes made to the document.
Oulton Broad Parish Council	<p>Generally supportive but wishes to raise the following points.</p> <p><u>Victoria Road</u></p> <p>Could become a barrier to accessing essential services. Crossing points and traffic calming measures should be included in future development.</p> <p>Bus stops could impede traffic flow and should be located in laybys.</p> <p>Side roads have poor visibility and lack of turning space. Side roads should be equipped with proper visibility splays and large radius entries and exits.</p> <p><u>Waterfront access</u></p>	<p>It is agreed that crossing points at Victoria Road are important to enable access to schools, doctor's surgeries and other essential services.</p> <p>Whilst off-road bus stops can be preferable in some cases, they can make it hard sometimes for buses to rejoin the road. In addition, there is little/no space along Victoria Road to allow them anyway.</p> <p>It is agreed that the junctions with side roads accessing Victoria Road suffer from poor visibility but again there is little that can be done practicably.</p>	No changes made to the document.

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	<p>The central pedestrian walkway should be shown with a clear route to ensure that it is delivered.</p> <p>Waterfront access benefits society and the individual. Prior to industrialisation there was a tow path along the waterfront.</p> <p>Haphazard road layouts and objects can seriously impede pedestrian access. There should be continuous public access to the waterfront along the whole length of the development.</p>	<p>A central cycling, walking and wheeling route, linking the different sites within the Kirkley Waterfront is an important part of future development.</p> <p>Waterfront access needs to be balanced against the requirements of employment and marine uses operating in the area, to ensure that there are no health and safety concerns. There is also the private marina on part of the site. Therefore, continuous waterfront access will not be possible. However, access points, enabling views of and across Lake Lothing, will be provided where possible</p>	
Pegasus (on behalf of Statuslist) Peter Atkin	<p>Housing</p> <ul style="list-style-type: none"> • Supports high-quality design. • Welcomes recognition of the need for flexibility and use of varying building heights. • Disappointed that the text on self-build doesn't recognise the viability challenges 	<p>Housing</p> <p>The text will be updated slightly to reflect the self-build request, although the tenor of the Position Statement is that Kirkley Waterfront overall has significant viability challenges.</p>	<p>Housing</p> <p>Text on self-build updated to reflect local plan policy WLP8.3.</p> <p>Affordable Housing</p>

Name, organisation and agent	Comment Summary	Council Response	Change required
	<p>and recommends text is amended to reflect policy wording in WLP8.3.</p> <p>Affordable Housing</p> <ul style="list-style-type: none"> • Welcomes recognition of viability challenges. • Document should reference Vacant Building Credit which provides an incentive for brownfield sites containing vacant buildings and which may legitimately reduce a site's affordable housing requirement to below 20%. <p>Employment Land</p> <ul style="list-style-type: none"> • The document is sufficiently clear on employment land uses supported, but guidance on hours of operation is needed. • If the Brooke Business Park is retained for employment and marine uses, then the need of employment land on the Jeld Wen site should be reconsidered. <p>Open Space/ Play Space</p>	<p>Employment Land</p> <p>The Brooke Marine site has an extant permission to develop the peninsular for residential use. There is a lack of certainty regarding delivery and any development on the site. Each main parcel of land is expected to come forward independently of the others and meet the requirements set out the Position Statement, including for employment (where relevant). It is also worth noting that if the existing Brooke Marine employment area <i>did</i> remain in the longer term, it would not necessarily be a like-for-like 'replacement' for new employment land – this would typically be new buildings in good condition, perhaps to assist with the offshore/cleantech market, for example.</p> <p>Residential use along the waterfront on the Jeld Wen site opposite 24/7 port operations on the north side would not</p>	<p>Reference to Vacant Building Credit added.</p> <p>Employment Land</p> <p>Additional text added regarding hours of operation.</p> <p>Priorities for each site (Jeld Wen, now called Statuslist)</p> <ul style="list-style-type: none"> • The description of the planning application has been updated. • 3 hectares of employment land has been updated to 2.2 hectares. • Text on gull habitat mitigation has been updated as suggested. • Text on the crossing has been updated as suggested.

Name, organisation and agent	Comment Summary	Council Response	Change required
	<ul style="list-style-type: none"> Welcome recognition that it is challenging to coordinate an open space strategy/ provision across the whole site. They consider the solution pragmatic. <p>Primary School and Pre-school(s)</p> <ul style="list-style-type: none"> The document shouldn't specific the number of crossings required. An Early Years setting on each main parcel of land is supported and the stated flexibility. <p>Priorities for each site (Jeld Wen, now called Statuslist)</p> <ul style="list-style-type: none"> The description of the site will soon be out-of-date and shouldn't be included in the document. New description proposed – <i>"Up to 500 residential dwellings (Class C3 use); up to 2.2 hectares (ha) of employment land, comprising up to 16,076sqm Class B2/B8 floorspace; and up to 2.26ha Early Years land (Class F1a) use), with associated access, public open space, infrastructure and landscaping"</i>. 	<p>be supported by the Council, as it could risk the operational Port of Lowestoft on the North Quay.</p> <p>The longer term future of the Kirkley Waterfront allocation may well be reviewed in the forthcoming East Suffolk Local Plan.</p> <p>Primary School and Pre-school(s)</p> <p>The provision for each main parcel of land to supply a crossing has been retained, as there is little certainty whether and when individual sites will actually come forward. Any specific details and situations can be addressed through the planning application process.</p> <p>Streets and Transport</p> <p>It is agreed that whilst operational requirements may restrict a full waterfront path, views and access</p>	<p>The route on Map 8 has been labelled "indicative" as requested.</p> <p>Connectivity to be provided (to outside the site)</p> <p>Text altered to largely reflect the Sanyo text on this point – this expresses the connectivity improvements more broadly, in the context particularly of schools and GP access</p> <p>Open Space, Biodiversity and Green Infrastructure</p> <p>The text on gull habitats altered to say: "Ensuring that there are alternative appropriate habitats for the gulls who currently nest and</p>

Name, organisation and agent	Comment Summary	Council Response	Change required
	<ul style="list-style-type: none"> Request that “3 hectares of employment land” is changes to “2.2 hectares of employment land”. Request change to text on gulls – <i>“Investigate the potential and where possible provide for gull habitat mitigation. and ensure both short term and long term habitats to enable the gulls who currently nest on-site to relocate. A full survey of gull habitats will also be required.”</i> Request change to text on crossings – <i>“Appropriate contributions (financial and/or direct delivery) towards a safe crossing point (or points) of on Waveney Drive/Victoria Road will be necessary. Contributions towards improving cycling, walking and wheeling connectivity to key local services will also be sought.”</i> Supports a range of provisions that are list in the document and that are currently being brought forward through the planning application process. <p>Streets and Transport</p>	<p>where appropriate are important. This is reflected in the text.</p> <p>East-West Cycling, Walking and Wheeling Route</p> <p>It is agreed that the route should be labelled as Indictive.</p> <p>Connectivity to be provided (to outside the site)</p> <p>The Position Statement outlines that the primary school within the site will no longer be required, meaning residents of the site will now need to attend schools external to the site. Improving the routes – especially crossing points of Waveney Drive/Victoria Road – to these sites is key to ensure that they are safe for children to use.</p> <p>The exact contributions and method of delivery of off-site cycling and walking</p>	<p>roost on-site to relocate to.”</p> <p>East-West Cycling, Walking and Wheeling Route</p> <p>“Indicative” added to title of map 8</p>

Name, organisation and agent	Comment Summary	Council Response	Change required
	<ul style="list-style-type: none"> • Welcome acknowledgement of the challenges with public access to the waterfront. • A sense of connectivity with the lake can be achieved through urban design such as clear viewing corridors. <p>East-West Cycling, Walking and Wheeling Route</p> <ul style="list-style-type: none"> • They support the travel route. • It is pragmatic to recognise the green corridor may not be delivered on the Brooke Marine site and consider other mechanism such as a Public Path Order to give certainty to Sanyo and Jeld Wen. • The route on Map 8 should be labelled “indicative”. <p>Vehicular Parking</p> <ul style="list-style-type: none"> • Flexibility towards car parking is welcome. • The design criteria for car parking are considered reasonable. • Pre-school drop-off is noted. 	<p>improvements will be determined through the planning application process for each site. It is recognised that contributions to broader improvements, to connect to Lowestoft and Oulton Broad town centres, for example, might be challenging to secure viably, though.</p> <p>Open Space, Biodiversity and Green Infrastructure</p> <p>More naturalistic options to safeguard parts of the County Wildlife Site could potentially be considered, but dogs are capable of pushing through even deep undergrowth, so it may be that some secure fencing would be the only practicable way of securing sensitive habitats. Therefore the text will not be changed.</p> <p>The gulls on the site enjoy protection and it is noted that both the RSPB and the Council’s own ecologist are supportive of replacement roosting</p>	

Name, organisation and agent	Comment Summary	Council Response	Change required
	<p>Connectivity to be provided (to outside the site)</p> <ul style="list-style-type: none"> • It doesn't appear that there are any supporting feasibility studies regarding necessary works. The requirement is therefore unreasonable. • It unhelpful and unnecessary to add requirements to a challenging site. • Parcels of land should connect into existing points around the edge of the site. • Scope for wider connections should be a matter for planning applications and subject to viability. <p>Open Space, Biodiversity and Green Infrastructure</p> <ul style="list-style-type: none"> • A naturalistic option should be used instead of secure fencing with no gates to restrict public access into the CWS. <p>Summary</p> <ul style="list-style-type: none"> • There are significant up-front costs associated with the redevelopment which 	<p>habitats, as their current habitat would be lost once the sheds are demolished. The text will be modified to delete the requirement for both short- and long-term habitats to be available, but will say that alternative appropriate habitats should be available for the gulls to relocate to.</p>	

Name, organisation and agent	Comment Summary	Council Response	Change required
	should be acknowledged by ESC and sufficient flexibility introduced policy.		
RSPB (Luke Wilkinson)	RSPB supports the comments regarding gulls under matters for Jeld Wen. There are significant breeding pairs of gulls on the Jeld Wen site and RSPB supports that alternative nesting sites should be provided in the locale where possible.	Appreciate the RSPB's support.	No changes made to the document.
Shaun	Supports business use and green areas, but no housing. Believes housing would be detrimental to the area. Concerned about flooding.	<p>It is not agreed that the proposed housing development would have a detrimental impact. The Position Statement will facilitate a high quality mixed use development that will enhance the character of the surrounding area.</p> <p>There is a dedicated chapter of Flood Risk Management that address the need for flood resilience and mitigation including land-raising.</p>	No changes made to the document.
Slark, Ronald	Respondent suggests that the roofs of residential buildings align with the suns passage to enable the use of solar panels.	The document supports a high quality of design, construction and energy efficiency. The details are provided in the chapter on Urban Design Guidance.	No changes made to the document.

Name, organisation and agent	Comment Summary	Council Response	Change required
		The Future Homes Standard is expected to introduce new Building Regulations which require solar panels on the roofs of new buildings.	
Sport England (Clare Howe)	<p>Jeld Wen Playing Field</p> <p>They note the existing Jeld Wen football pitch has not been in use for more than 10 years.</p> <p>Paragraph 15 of Sport England's Playing Fields Policy and Guidance notes</p> <ul style="list-style-type: none"> • A lack of use of a playing field, or part of, should not necessarily indicate an absence of need. • Land can retain the potential to provide playing pitches to meet current or future needs. • If used as a playing field in the five years then Sport England should be consulted as a statutory consultee. • If it is over five years ago, Sport England would still expect to be consulted, albeit as a non-statutory consultee and Sport England apply its Playing Fields Policy. 	Appreciate the advice and link to Sport England's Active Design Guidance. It is noted that Sport England has no further comments of the former Jeld Wen playing fields.	No changes made to the document.

Name, organisation and agent	Comment Summary	Council Response	Change required
	<ul style="list-style-type: none"> The former playing fields have planning permission for residential development and a legal start has been made on site with a Certificate of Lawfulness application was granted in 2024 (DC/24/0490/CLE). On this basis, Sport England have no further comments. <p>Active Design</p> <ul style="list-style-type: none"> Sport England provided a link to 'Active Design', a guide to planning new developments that create the right environment to help people get more active. The guidance sets out ten key principles for ensuring developments incorporate opportunities for people to take part in sport and physical activity. Whilst the SPD does not refer to Sport England's Active Design Guidance, the principles are reflected throughout the SPD which is supported. 		
Stuart	Respondent requests that natural areas are preserved to protect existing wildlife as it will not recover in the same way if replaced.	The development will have to comply with biodiversity legislation and provide a minimum 10% biodiversity net gain (BNG).	No changes made to the document.

Name, organisation and agent	Comment Summary	Council Response	Change required
		The document has a dedicated chapter on Open Space, biodiversity and green infrastructure which supports wildlife.	
Suffolk County Council (Busranur Serin)	<p>Archaeology</p> <p>SCC Archaeology has no further comments other than reiterating the recommendations provided in response to the previous consultation stage.</p> <p><i>“Suffolk County Council Archaeological Service (SCCAS) would recommend that, excluding the few small areas that received archaeological evaluation (negative) in 2013 (HER codes LWT 215 and 190), the whole site should have a full Desk Based Assessment looking at archaeological potential. This will help inform the need/extent/timing of trial trench evaluation.</i></p> <p><i>SCCAS also accepts that there may be significant disturbance and/or contamination. SCC recommends that contamination and GI investigations include archaeological monitoring and analysis to also help inform the need/extent/timing of trial trench evaluation. This is in line with Waveney Local Plan 2019 Policy WLP8.40 (Archaeology) and the NPPF as</i></p>	<p>The East-West cycling, walking and wheeling route will be an important part of the site and is a policy requirement. A cohesive east-west path is a minimum requirement but expansion of this path to a more circular route would likely be considered positively with any applications. Cohesive wayfinding would be beneficial and will be referenced in the text.</p> <p>An Equalities Impact Assessment has been undertaken.</p> <p>The WSP report highlights the constraints along Heath Road and School Road and indicates the trip distribution that will allow both roads to function within capacity. The WSP report further suggested potential improvements (including Traffic</p>	<p>No significant changes made to the document.</p> <p>Text added to the Streets and Transport chapter, East-West Cycling and Walking Route, “A coherent and legible series of wayfinding that promotes the identity of the Kirkley Waterfront site should be provided across all sites.”</p> <p>A reference to the Minerals and Waste Local Plan 2020 added to the Introduction chapter and the safeguarded North Quay port (W4) added to the new</p>

Name, organisation and agent	Comment Summary	Council Response	Change required
	<p><i>set out in Chapter 16 – Conserving and enhancing the historic environment.”</i></p> <p>Education</p> <p><i>Land_Use – Primary school and pre-school(s)</i></p> <ul style="list-style-type: none"> • SCC welcomes the contents regarding the primary school. However, a critical issue will be ensuring that there are safe and suitable walking, cycling and wheeling routes to local primary schools. • SCC welcomes the three on-site Early Years facilities to be delivered. The Jeld Wen planning application has identified 0.26 hectares for early years setting of up to 60 places. • The other two major landowners are to provide 0.22 hectares each for settings of up to 60 places. This land should be secured by way of a Section 106 agreement. • The assumption is that infrastructure will be funded by Section 106. • SCC notes that child yield per full time place is currently 0.12 per dwelling. 	<p>Regulation Orders) to help manage the impact of the traffic on the existing junctions. The exact measures and requirements will be subject to more detailed plans and Transport Assessments for individual applications as well as further review from the Highway Authority.</p> <p>It is agreed that sustainable transport will be an important element of the wider scheme and the crossing points will help facilitate this. As noted in the Position Statement the full extent of the contributions (including potential off-site parking) towards any off-site works will be a matter of negotiation, however it remains an ambition.</p> <p>The comments on Archaeology, Libraries, Public Health and Flooding are noted, but it is not considered necessary to alter the text in the Position Statement – any relevant</p>	<p>section “Protecting port operations” in Chapter 2.</p>

Name, organisation and agent	Comment Summary	Council Response	Change required
	<p>Flooding (Lead Local Flood Authority)</p> <ul style="list-style-type: none"> • SCC welcomes the SuDS statement. • The content has incorporated prior comments and supports SCC to carry out its responsibilities as the Lead Local Flood Authority (LLFA). <p>Health and Wellbeing</p> <p><u>Land Use – Local Retail Centre</u></p> <p>SCC welcomes the exclusion of any Sui Generis use, which effectively prevents the inclusion of hot food takeaways. This is a positive and important measure that supports public health objectives. Given the proximity of the proposed retail centre to the pre-school and areas where children and families are likely to gather, this is an important position.</p> <p>To safeguarding this intention and avoid the risk of future reinterpretation or variation, SCC recommends specific references NPPF paragraph 97 are included, which states:</p>	<p>matters will be picked up through the determination of planning applications.</p> <p>A reference to the Minerals and Waste Local Plan 2020 will be added to Site Changes list in Chapter 1 and the protected Port of Lowestoft (North Quay) wharf added to the new section on the Port of Lowestoft on page 9. It is not considered necessary to add the reference to the Minerals Consultation Area, as this was considered in the allocation of the site.</p>	

Name, organisation and agent	Comment Summary	Council Response	Change required
	<p>“97. Local planning authorities should refuse applications for hot food takeaways and fast food outlets:</p> <p>a) within walking distance of schools and other places where children and young people congregate, unless the location is within a designated town centre;”</p> <p>It is recommended that the PPS acknowledges the established public health rationale for restricting hot food takeaway / Sui Generis use. The PPS should set a clear stance that Sui Generis uses, such as hot food takeaways, are not compatible with the health and wellbeing objectives of the development.</p> <p><u>Libraries</u></p> <p>New residents’ needs will be met at existing libraries in the area. However, improving library capacity or services will require developer funds. Mitigation would need to be secured by way of Section 106 contributions.</p> <p>It is recommended to ensure good connectivity to libraries. They are community hubs and their role in supporting sustainable living, education, and access to information for households.</p>		

Name, organisation and agent	Comment Summary	Council Response	Change required
	<p><u>Minerals and Waste</u></p> <p>The following comments made in response at the previous consultation stage are still relevant, and the information set out around the Suffolk Minerals and Waste Local Plan 2020 and safeguarded site should be mentioned in the document:</p> <p>“...Reference should be made to the adopted Suffolk Minerals and Waste Local Plan 2020</p> <p>Note Safeguarded Site W3 North Quay, Lowestoft Port Authority</p> <p>The location of safeguarded sites and ' mineral consultation areas' can be found using the Interactive Map of Waste Locations of Interest² and 'definitive map of sites' can be found in the Suffolk Minerals and Waste Local Plan 2020.</p> <p>This safeguarded site and the cumulative impacts should be taken into consideration. On this basis Policy MP9 - Safeguarding of port and rail facilities, and facilities for the manufacture of concrete, asphalt and recycled materials – consideration will need to be given to whether the safeguard site may be compromised or lost by this development.</p>		

Name, organisation and agent	Comment Summary	Council Response	Change required
	<p>The site is within a Mineral Consultation Area for the possible extraction of minerals above the 5Ha threshold of Policy MP10. Therefore, it needs to be shown that ‘the sand and gravel present is not of economic value, or not practically or environmentally feasible to extract, or that the mineral will be worked before the development takes place or used within the development’.</p> <p>It should be noted that north Quay has an active minerals wharf processing an average 150,000 tonnes cargo per year.”</p> <p><u>Natural Environment</u></p> <p>SCC notes that the document provides detailed analysis of the various sites involved.</p> <p>It would be useful, if a schematic masterplan was included that illustrates the elements and how they link together.</p> <p>SCC welcome that connectivity both for non-motorised users as well as for wildlife have been woven into all aspects of the document.</p> <p>The fencing of routes through the CWS should be done sympathetically to provide amenity and avoid the sensation of a narrow corridor. If</p>		

Name, organisation and agent	Comment Summary	Council Response	Change required
	<p>possible fencing should set back from pedestrian and cycle routes. SCC recommends consideration be given to minimising disturbance to the CWS particularly for new residents who own dogs. Dog walking and exercise areas should be carefully considered.</p> <p>Reference to the Suffolk Design Streets Guide is welcome, but a greater commitment to tree-lined/green streets and end of road micro green spaces is suggested.</p> <p><u>Passenger Transport</u></p> <p>SCC Passenger Transport welcomes the content.</p> <p>It is recommended that the residents have easy access to bus services in the area including appropriately located bus shelters with Real Time Passenger Information screens.</p> <p><u>Public Rights of Way</u></p> <p><i>Urban design guidance – Lake Lothing</i></p> <p>The importance of blue space for health and wellbeing should be stressed. There should be an aspiration to prioritise public access to the waterfront as much as practical without that</p>		

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	<p>element being compromised by higher housing densities that is suggested in this paragraph.</p> <p><i>Streets and transport - East-West Cycling, Walking and Wheeling Route</i></p> <p>A traffic-free east-west route is welcome. Any east-west walking, cycling and wheeling link must be dedicated as public highway.</p> <p>Any such route must ensure dwellings are well connected to facilities, services, employment and key destinations.</p> <p>The east-west link does not need to be limited to just one option as shown in Map 8. It could form a circular route, with a road-free route option that incorporates the waterfront. Any a route should meet the needs of all users with frequent benches and effective wayfinding.</p> <p>SCC suggests wayfinding policy to sign residents and visitors to points of interest, services, and facilities within and outside the site to connect the development with the wider built and natural landscape.</p> <p>SCC recommends that an Equality Impact Assessment should be completed for the site.</p>		

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	<p><u>Transport</u></p> <p>SCC welcome the content of the document and the consideration of our previous comments.</p> <p><i>Streets and transport</i></p> <p>SCC support text to achieve suitable modal shift and reduce vehicular demand on accesses further.</p> <p><i>Streets and transport - Access</i></p> <p>SCC recommends limiting movements on School Road and Heath Road to ensure they are within capacity, regardless of whether a new access road is delivered to serve Brooke Marine. This may require physical restrictions on-site. Though if the new access road is delivered, trips will need to be distributed among School Road, Heath Road and the new access road accordingly.</p> <p>Traffic Regulation Orders may be needed on School Road and Heath Road to assist with traffic movement.</p> <p><i>Streets and transport – Pedestrian and Cycle Bridge</i></p>		

Name, organisation and agent	Comment Summary	Council Response	Change required
	<ul style="list-style-type: none"> • With no pedestrian bridge over Lake Lothing, priority should be given to sustainable transport across the allocation. • To encourage use of trains it would be sensible to ensure that there is sufficient secure cycle parking at the railway stations in Lowestoft and Oulton Broad. • Pedestrian crossing facilities on Waveney Drive / Victoria Road are vital to connected to services, including primary schools. • Safe walking routes to local primary and secondary schools should be secured by planning conditions. <p><i>Streets and transport - East-West Cycling, Walking and Wheeling Route</i></p> <p>An east-west route is paramount and will require engagement between developers.</p> <p><i>Streets and transport – Public Transport</i></p> <p>New residents need access to high-quality bus services and bus shelters with RTPI screens.</p> <p>General</p> <p><i>Land Use – Primary and pre schools</i></p> <p>There are two typos in this section that should be corrected.</p>		

Name, organisation and agent	Comment Summary	Council Response	Change required
Suffolk FA (Matt Stebbings)	<p>Respondent advises of a local deficit in football facilities. The historic playing fields cannot be accessed but this does not mean they are not needed, contrary to the East Suffolk Council playing pitch strategy.</p> <p>There isn't a surplus in provision and there is a need to protect or replace in line with policy.</p>	Sport England have noted the existing Jeld Wen football pitch has not been in use for more than 10 years and accepted the loss of the facility.	No changes made to the document.

Name, organisation and agent	Comment Summary	Council Response	Change required
Warner, Mike	<p>Respondent states that comments they made on previous consultation have not been addressed.</p> <p>They suggested that a new access road to the Sanyo site could be created where the Ladbrokes office is, and this could be relocated on the Sanyo site. This would provide direct access to main road and is wide enough.</p> <p>Heath Road already has insufficient parking which would be further impacted by putting junctions there. If parking was provided on the Sanyo site this would make it difficult to charge electric cars away from their homes.</p> <p>A representative said that charging points could be provided at a cost which would be higher than charging at home.</p>	<p>It appears that the consultation referred to last year was by the Council as landowner of the Sanyo site, not as author of the Planning Position Statement. Officers will speak to their colleagues about this matter.</p> <p>The Ladbrokes site is within different ownership to the Sanyo site and with further parcels of land behind meaning its potential as an access would be uncertain. If the applicant acquires this land and submits an application showing this as a point of access it will be considered during the decision-making process.</p> <p>The Position Statement will shape planning decisions but does not include a detailed layout plan of the estate roads. The exact layout the wider impact on existing roads will need to be considered during the decision-making process.</p>	No changes made to the document.
Wicks, Bev	Respondent has no objections to the redevelopment but has concerns about Heath Road's suitability as an access road.	The Kirkley Waterfront Planning Position Statement has been informed and supported by a Transport Access Study produced by WSP. This document	No changes made to the document.

Name, organisation and agent	Comment Summary	Council Response	Change required
	Also concerned about the large trees next to their house which have not been maintained by the Council. Respondent would like them maintained regularly.	<p>considered capacity levels for different access points and further considered an appropriate distribution of traffic movements between Heath Road and School Road. In addition, each individual application would be expected to undertake a further detailed transport assessment to ensure the roads function effectively.</p> <p>There is no indication that, in aggregate, Heath Road and School Road will not be able to accommodate the additional traffic arising, and it is also worth noting that the Council is strongly encouraging of higher levels of walking and cycling.</p> <p>The Position Statement does not cover the existing maintenance of trees. Instead, the Council's Asset Management Team should be contacted; officers will also speak to their colleagues about this.</p>	
Wright, Heather	Respondent is pleased that open spaces are included.	The Position Statement balances the desire for waterfront access with the operational constraints of employment along the quay side. Access points to	No changes made to the document.

Name, organisation and agent	Comment Summary	Council Response	Change required
	Would like to see waterside access with a walking and cycling route, and a waterside eating place and car parks.	the waterfront would be supported to provide views of Lake Lothing.	

Write to us



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