

Equality Impact Assessment Screening Opinion

Kirkley Waterfront Planning Position Statement

April, 2025



Introduction

1. It is the Council's duty under the Equality Act 2010 to undertake an Equality Impact Analysis at the time of formulating a decision, drafting a report, designing or amending a policy. This will ensure that the Council is considering and taking positive action where possible to promote access to services for all their communities, including their wider communities. The Equality Impact Assessment Screening Assessment will assess whether there is any impact upon any of the groups with protected characteristics under the Equalities Act, which are listed in the table below. If an adverse impact upon any of these groups is identified then a full Equalities Impact Assessment will be required.

Introduction

2. The original Kirkley Waterfront and Sustainable Urban Neighbourhood Supplementary Planning Document (SPD) was adopted in 2013. With a passage of time a significant amount has changed since then but is not possible to alter or change the SPD. Therefore, the purpose of this Position Statement is to set out the Council's approach to main issues concerning development of the Kirkley Waterfront Site. Once adopted by the Council, it will be a material consideration when deciding planning applications.

Land uses

3. This chapter provides an overview of policy WLP2.4, stating where the major development sites are within the Kirkely Waterfront area. It also sets out in greater detail the provision of affordable housing, housing for retirement housing, specialist housing, open space and play space, retail and employment land. Other issues covered include retail and the development of a pre-school setting.

Priorities for each site

4. This chapter covers the main sites provides an overview of how each of them should be developed. The main sites are Jeld Wen/Statuslist, Brooke Marine, Sanyo/Survitec and Scenic. In each case, the chapter outlines current uses and issues on each site and lists the matters that development on each site should address.

Transport and Streets

5. This chapter provides guidance about transport, both within and connecting to the Kirkley Waterfront site. This includes the design of the road network, seeking to remove pinch points. It also includes vehicle parking, electric vehicle charging points the provision of pedestrian and cycle routes. A key objective of the chapter is to encourage cycling and

walking and reduce car use. Key parts of this include good connectivity across the site, as well as safe crossing points and convenient cycle parking.

Open Space, Biodiversity and green infrastructure

6. This chapter provides an overview of the open space, biodiversity and green infrastructure issues relating to development of the Kirkley Waterfront site. This includes the condition, access to and management of the Brooke Yachts and Jeld Wen Mosaic County Wildlife Site. The chapter explains how biodiversity net gain (BNG) will affect redevelopment of the site. It explains how the impacts of development of gulls that nest on the site will be mitigated. A habitat regulations assessment was undertaken, which stated that any impact upon protected sites could be mitigated. The Recreational Disturbance Avoidance Mitigation Strategy (RAMS) is a payment per dwelling towards mitigating the impact of recreational activity on European sites, which results from the development. Other issues covered include the delivery of new playing fields on the site, the delivery of open space and the delivery of play space.

Urban Design Guidance

7. The chapter sets out the key issues that need to be covered when planning future development. Issues covered include context driven design (design should reflect industrial and maritime history); the importance of Lake Lothing; creating connectivity across the site in terms of cycling and walking; creating an overarching character and identity for the whole site; pedestrian scale design; developing a network of green spaces across the site; encouraging use of the Suffolk Design Management Process and Suffolk Design Review Panel; promoting sustainable design.

Flood Risk Management

8. This chapter states that existing guidance contained in the Sustainable Urban Neighbourhood and Kirkley Waterfront Supplementary Planning document is still relevant. It also sets out the level of flood risk across the Kirkley Waterfront site, stating that parts of it are located within flood zone 3 (the highest risk) and other parts in flood zone 2. It also provides information about the sequential and exception tests, flood resilience and mitigation and land raising, as well as sustainable urban drainage. The Position Statement includes flood resilience and mitigation measures which appeared in the original SPD. The position statement provides guidance about land raising, including soil types and the need to encourage vegetation to thrive. Material used in land raising must also encourage high quality SUDs approaches across the site. Each site should contain sustainable drainage systems that adequately drain the site without flowing onto adjoining land. SUDs should be able to be adopted by Suffolk County Council or Anglian Water. Open space should form

part of any SUDs scheme. Surface water and foul drainage should be designed into any SUDs scheme on the Kirkley Waterfront site and a foul drainage scheme agreed with Anglian Water (AW).

Equalities Act

9. The Equality Act 2010 lists nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation. East Suffolk Council has added a tenth characteristic, socio-economic deprivation, in addition to the nine protected characteristics listed in the legislation. This reflects that pockets of deprivation that exist across East Suffolk.

Screening of impact on different groups

	Groups	Likely Impact (positive/negative/no impact)	Reason for your decision
a	Age (Includes safeguarding issues)	Positive	<p>Redevelopment of the Kirkley Waterfront site includes the provision of play spaces, playing fields, pre-school settings and retirement housing. The housing allocated on the site will also provide accommodation for older people. It will therefore benefit those from different age groups.</p> <p>Consultation documents will be available online and in libraries. The Council will offer assistance in its publicity material for those who cannot view consultation materials in the ways outlined above. The consultation will therefore not discriminate against those from different age groups.</p>

b	Disability	Positive	<p>Redevelopment of the Kirkley Waterfront site is anticipated to include the delivery of a nursing home and retirement accommodation. Some of the housing allocated on the site is likely to be accessible, which will likely benefit those who are disabled. Redevelopment of the site will therefore benefit those with a disability.</p> <p>Consultation documents will be available online and in libraries. The Council will offer assistance in its publicity material for those who cannot view consultation materials in the ways outlined above. The consultation will therefore not discriminate against those with a disability.</p>
C	Gender reassignment	No impact	<p>The Kirkley Waterfront Position Statement contains guidance that seeks to guide the regeneration of the Kirkley Waterfront site. It will therefore not impact upon this group.</p> <p>Consultation documents will be available online and in libraries. The Council will offer assistance in its publicity material for those who cannot view consultation materials in the ways outlined above. The consultation will therefore not discriminate against who have undergone gender reassignment.</p>

D	Marriage and Civil Partnership	No impact	<p>The Kirkley Waterfront Position Statement contains guidance that seeks to guide the regeneration of the Kirkley Waterfront site. It will therefore not impact upon this group.</p> <p>Consultation documents will be available online and in libraries. The Council will offer assistance in its publicity material for those who cannot view consultation materials in the ways outlined above. The consultation will therefore not discriminate against those who are married or in a civil partnership.</p>
E	Pregnancy and maternity	No impact	<p>The Kirkley Waterfront Position Statement contains guidance that seeks to guide the regeneration of the Kirkley Waterfront site. It will therefore not impact upon this group.</p> <p>Consultation documents will be available online and in libraries. The Council will offer assistance in its publicity material for those who cannot view consultation materials in the ways outlined above. The consultation will therefore not discriminate against those who are pregnant or on maternity leave.</p>
F	Race	No impact	<p>The Kirkley Waterfront Position Statement contains guidance that seeks to guide the regeneration of the Kirkley Waterfront site. It will therefore not impact upon this group.</p>

			<p>Consultation documents will be available online and in libraries. The Council will offer assistance in its publicity material for those who cannot view consultation materials in the ways outlined above. The consultation will therefore not discriminate against those from different racial backgrounds.</p>
G	Religion or Belief	No impact	<p>The Kirkley Waterfront Position Statement contains guidance that seeks to guide the regeneration of the Kirkley Waterfront site. It will therefore not impact upon this group.</p> <p>Consultation documents will be available online and in libraries. The Council will offer assistance in its publicity material for those who cannot view consultation materials in the ways outlined above. The consultation will therefore not discriminate against those from different religions or beliefs.</p>
H	Sex	No impact	<p>The Kirkley Waterfront Position Statement contains guidance that seeks to guide the regeneration of the Kirkley Waterfront site. It will therefore not impact upon this group.</p> <p>Consultation documents will be available online and in libraries. The Council will offer assistance in its publicity material for those who cannot view consultation materials</p>

			in the ways outlined above. The consultation will therefore not discriminate in terms of sexual identity.
I	Sexual orientation	No impact	<p>The Kirkley Waterfront Position Statement contains guidance that seeks to guide the regeneration of the Kirkley Waterfront site. It will therefore not impact upon this group.</p> <p>Consultation documents will be available online and in libraries. The Council will offer assistance in its publicity material for those who cannot view consultation materials in the ways outlined above. The consultation will therefore not discriminate in terms of sexual orientation.</p>
J	Socio-economic deprivation	Positive impact	<p>The Kirkley Waterfront Position Statement contains guidance that seeks to guide the regeneration of the Kirkley Waterfront site. This will include publicly accessible open space and facilities and probably affordable housing and this will have a minor positive impact on those who are experiencing socio-economic deprivation.</p> <p>Consultation documents will be available online and in libraries. The Council will offer assistance in its publicity material for those who cannot view consultation materials in the ways outlined above. The consultation will therefore not</p>

			discriminate against those who are experiencing socio-economic deprivation.
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Consultation and Engagement

10. There was an initial process of consultation, which guided the preparation of the Kirkley Waterfront Position Statement (SPD). The consultation ran from 6th March 2024 to 3rd April 2024 and the following groups were contacted:

- Landowners and their agents
- Lowestoft Town Council and Oulton Broad Parish Council
- Suffolk County Council – Highways, Public Health, Planning Strategy
- Infrastructure providers – e.g. Network Rail, Environment Agency etc.
- Relevant national, regional and county level organisations – Sport England, Homes England, Sustrans, Home Builders Federation, etc.
- The NHS Norfolk and Waveney Integrated Care Board
- Nearby local residents.

The organisations listed above were contacted by email or post. The consultation was advertised on the Council's website as well as on social media posts. A questionnaire was published on the Council's website, which included background information about the Position Statement, as well as a series of questions to be completed. Hard copies were available on request by contacting the planning policy and delivery team. Hard copies were also made available at local libraries and customer services centres. Comments received have been taken into account in the preparation of the draft Position Statement.

11. A formal public consultation will take place from 3rd April to 8th May on the Draft Kirkley Waterfront Position Statement. This consultation will last a total of five weeks. The purpose of this consultation is to enable respondents to comment on the draft Kirkley Waterfront Position Statement. The document will be made available online on the Council's website and in hard copies at local libraries to enable people to comment. Consultation letters and emails will be sent to relevant consultees on the Council's planning policy mailing list. A press release will be released covering the consultation and there will be a notice on social media. The planning policy mailing list includes Lowestoft Town Council, Oulton Broad Parish Council, Suffolk County Council, ward members, neighbouring district Councils including the Broads Authority, developers, agents, landowners, business associations, civic

societies, infrastructure providers, and members of the public. The Council will also contact those who responded to the first consultation and asked to be informed of the second formal stage of public consultation.

12. Anyone who is unable to view the consultation documents online or in libraries because of lack of internet access or disability can contact the Planning Policy and Delivery Team, and the publicity material provides contact details and an offer of assistance. This includes posting hard copies to the address of those who cannot access consultation materials in other ways.

Presentation in Different Languages

13. As part of a five-week period of formal consultation, the document will be published on the Council's website, with hard copies available on request for those unable to access it online. The document may be requested in a different language. When such requests are received the Council as a whole will fulfil any such requests.

Proposed Changes

14. The Council will analyse responses received during the public consultation and will make appropriate changes as a result of comments received.

Conclusion

15. This EQIA screening exercise shows that the Kirkley Waterfront Position Statement will not negatively impact upon any protected group or those experiencing socio-economic deprivation. Therefore, a full EQIA assessment is not considered necessary.