



KIRKLEY WATERFRONT PLANNING POSITION STATEMENT

JULY 2025

Guidance for landowners, developers and key stakeholders on the redevelopment of this largely redundant brownfield site in Lowestoft

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Map 1 Site location

Introduction

This Planning Position Statement sets out the Council's position on key issues relating to the re-development of Kirkley Waterfront. It is an important corporate priority for the Council to see this site redeveloped.

The Sustainable Urban Neighbourhood and Kirkley Waterfront site is a strategic site allocated in the Waveney Local Plan (2019). The site is allocated for a mix of uses including 1,380 new dwellings, a retirement community, employment land and a primary school.

This brownfield site, which has been largely redundant and in need of re-development for many years, is key to delivering significant new housing and employment land in Lowestoft. On the key development sites, planning permission is being sought, the landowner/developer is engaged in pre-application discussions with the Planning team or there is an extant planning permission.

There are various issues affecting development on the site and viability is a major challenge. The Council needs to be pragmatic about what is likely to be achievable and wants to provide some helpful advice to landowners/developers and other key stakeholders in relation to key issues.

The Planning Position Statement is a material planning consideration and will be used to help make decisions on planning applications, alongside the Waveney Local Plan, the Kirkley Waterfront Supplementary Planning Document and other relevant considerations. The 'weight' it should be afforded is a matter for decision-makers in the context of other material considerations (including the National Planning Policy Framework) and the provisions of the Development Plan (the Waveney Local Plan and the Suffolk Minerals and Waste Local Plan).

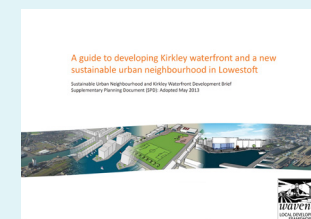
Waveney Local Plan

[Waveney Local Plan](#) policy WLP2.4 requirements, and other adopted policy requirements, cannot be formally altered through the Planning Position Statement and so remain in place.

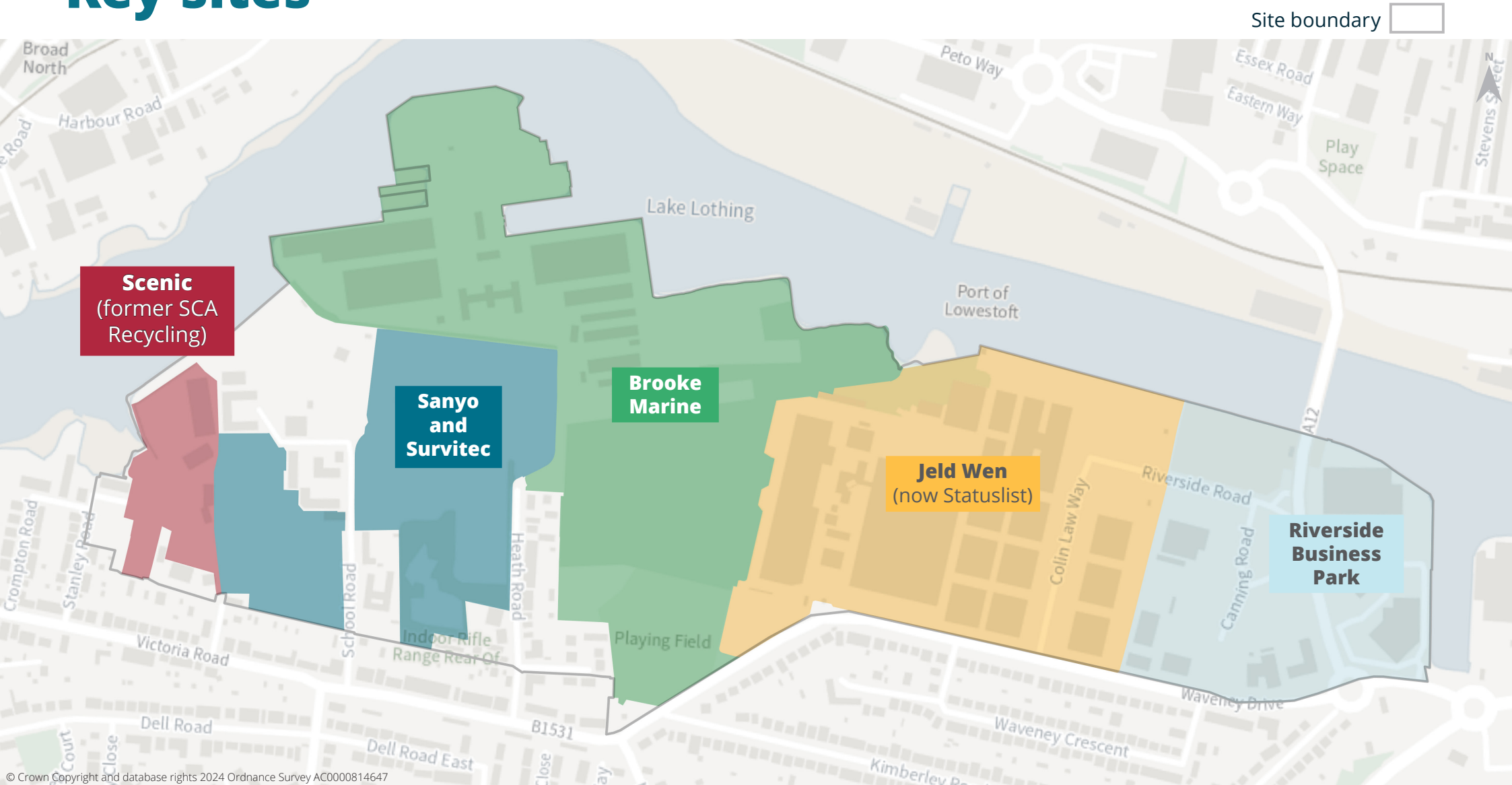


Supplementary Planning Document

The [Sustainable Urban Neighbourhood and Kirkley Waterfront Development Brief](#) was adopted in 2013 and will not be formally altered. Some of the information and details in the SPD is somewhat dated now, though.



Key sites



Map 2 Kirkley Waterfront and Sustainable Urban neighbourhood site allocation, showing key sites

Key changes



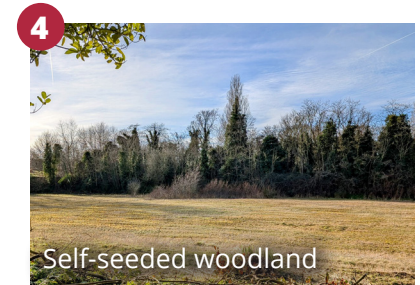
1 Outline planning permission on whole of Brooke Marine site, with Certificate of Lawful Development issued in 2024



2 Recent residential development



3 East Suffolk Council purchased the Sanyo site and cleared most of the buildings



4 Self-seeded woodland



5 Proposed phase 1 of the Brooke Marine development (no completions yet on site)



6 Planning application received for mixed-use development on the former Jeld Wen site



7 Colin Law Way road with associated pedestrian and cycling infrastructure



8 Riverside employment development



9 Gull Wing bridge, roads and roundabout with associated pedestrian and cycling infrastructure



Maxar, Microsoft | Esri Community Maps Contributors, Esri UK, Esri, TomTom, Garmin, Foursquare, GeoTechnologies, Inc. MET/NA

Map 3 Key changes since the adoption of the Sustainable Urban Neighbourhood and Kirkley Waterfront Development Brief SPD in 2013

Wider changes include

- New/updated Building Regulations
- Biodiversity Net Gain legislation came into effect in 2024
- Adoption of the Waveney Local Plan in 2019 and Suffolk Minerals and Waste Local Plan in 2020
- Adoption of the East Suffolk Community Infrastructure Levy Charging Schedule in 2023 (the site is zero-rated)
- Changes to the Use Classes Order in 2020
- Financial viability issues have increased significantly
- The tidal barrier is no longer being progressed
- Adoption of the Healthy Environments Supplementary Planning Document (2024) (as well as other SPDs)
- Updated Flood Risk Policy (National Planning Policy Framework 2024, paragraph 182) and Flood Maps (March 2025)
- Financial viability has decreased significantly

Land use

Most relevant Local Plan policies, Supplementary Planning Documents, other guidance and documents for the Kirkley Waterfront site

- [WLP2.4 Kirkley Waterfront and Sustainable Urban Neighbourhood](#)
- [WLP8.1 Housing Mix](#)
- [WLP8.2 Affordable Housing](#)
- [WLP8.3 Self Build and Custom Build](#)
- [WLP8.24 Flood Risk](#)
- [WLP8.29 Design](#)
- [WLP8.31 Lifetime Design](#)
- [Affordable Housing SPD](#)
- [Custom and Self-Build Housing SPD](#)
- [Healthy Environments SPD](#)
- [Sustainable Construction SPD](#)
- [Historic Environment SPD](#)
- [East Suffolk Cycling and Walking Strategy](#)
- At the time of writing, the [Lowestoft Neighbourhood Plan](#) is undergoing independent examination and is expected to be 'made' in Winter 2025.

Waveney Local Plan policy WLP2.4 allocates the site for a range of uses, including 1,380 new homes, a retirement community, employment land, a primary school and pre-school. This is the main policy relating to the site.

Key matters

Housing

A high-quality design and layout that maximises the delivery of new homes is wanted. As a regeneration site in the middle of Lowestoft, a density of approximately 50 – 90 dwellings per hectare of residential built form would be appropriate. 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 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. Some taller buildings would be supported to maximise longer views across Lake Lothing to the north. 5% of housing on sites of 100+ dwellings should be self-build, unless this is satisfactorily demonstrated to be unfeasible.

Specialist/retirement accommodation

A comprehensive, high-quality scheme should be developed. Extra-care and/or sheltered dwellings should be located adjacent to the care home so residents can benefit from shared facilities, services, and staff. Extra-care and/or sheltered dwellings, plus the care home, should be well related to services, facilities, and public transport connections, and located so as to reduce social isolation. Good pedestrian, cycling and wheeling links should be provided, including throughout the site and to existing and proposed pedestrian networks nearby.

Current position on land use (continued)

Affordable housing

It is recognised that the viability of the site is low, due to the legacy of industrial uses, contamination, flood risk and low land values (amongst other issues), and has declined since the adoption of the Waveney Local Plan. The 20% requirement set out in the Waveney Local Plan is therefore highly unlikely to be achieved overall; however, any proposal to deliver a non-policy compliant level of affordable housing would need to be demonstrated through a viability assessment to the satisfaction of the Council. The Vacant Building Credit may apply on parts of the site where there are existing buildings (which could have the effect of reducing the affordable housing requirement). Where affordable housing can viably be provided, it should follow the principles of paragraphs 4.15 and 4.16 of the Kirkley Waterfront SPD (2013) and the Affordable Housing SPD (2022) in terms of the tenure mix.

Local Retail Centre

This is identified as a mixture of retail, cafes, restaurants and community uses (Use Classes E(a), E(b), F(1) and F(2)). This should be located on the Brooke Marine site, as a central location in the Kirkley Waterfront site, and as allowed for in the 2015 planning permission for that site.

Biodiversity Net Gain

The requirement for a minimum 10% biodiversity net gain (BNG) was introduced in 2024 through an amendment to the Town and Country Planning Act 1990 and affects all new planning application submissions from early 2024. The Sanyo/Survitec, Jeld Wen and Scenic sites are therefore all required to deliver this. 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), then BNG would be triggered. If this occurs, the situation could be complicated and it would need to be explored in more detail with the Council.

Soils, groundwater and contaminated land

Sustainable use of soils should be considered at the earliest stage, rather than well advanced into a design stage, to ensure that waste generation is minimised. The use of deep foundations such as piles should consider the risks to the water environment prior to any designs being developed, and not as an afterthought. Environment Agency guidance has been recently published, and any development should follow this guidance.

The use of infiltration may be limited, based on the previous land uses and the potential shallow depth of groundwater. Any development proposals should consider the Environment Agency's Sustainable Drainage System (SuDS) guidance at a very early stage.

Current position on land use (continued)

Open Space/Play Space

The Kirkley Waterfront SPD seeks appropriate play space and open space to be delivered on the site, including a Neighbourhood Equipped Area of Play (NEAP) of 1,000m², a Locally Equipped Area of Play (LEAP) of 400m² and a replacement football pitch of about 90m x 60m within a broader replacement playing field area. Policy WLP2.4 seeks a total of 1,800m² of children's play space with the playing field located centrally, close to the main new access road (the unbuilt road in the permitted Brooke Marine scheme).

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 occur. Therefore, requiring proportionate contributions from each site towards the overall requirement is a sensible alternative. It is important, however, that open space and play space is available for the wider Kirkley Waterfront residents to use, rather than being 'reserved' only for that specific development.

It remains the preference of the Council to provide a single large area of open grass of about 90m x 60m (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 largest sites 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 LEAP on each site with informal, usable, greenspace totalling 1,800m². A reduced requirement might be considered where the development can still provide high-quality open space and connections to facilities in the wider area.

The Healthy Environments SPD (adopted in 2024) contains further 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 Suitable Alternative Natural Greenspace (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.

Current position on land use (continued)

Protecting port operations

The Port of Lowestoft (owned and operated by Associated British Ports) is a key facility. It provides jobs and supports the substantial growth occurring in the offshore renewable energy sector off the East Anglian coast, as well as other offshore energy sectors, the Sizewell C development and other important trades. The Port – whose area of operations includes the north bank of Lake Lothing, opposite Kirkley Waterfront – is dynamic land that operates on a 24-hour, 7 days per week basis. Due to minerals being landed here, it is a safeguarded site (M3) in the Suffolk Minerals and Waste Local Plan (2020) and therefore enjoys the protection of Policy MP9 – Safeguarding of Port and Rail Facilities.

Any waterfront uses, connectivity to the waterfront and views of Lake Lothing must be compatible with port operations and not hinder its operation through (for example) amenity concerns. Applicants are encouraged to engage directly with Associated British Ports prior to the submission of any planning applications.

Employment land

Class E(g) offices, research and development and industrial processes (formerly class B1), B2 general industrial and B8 storage or distribution uses are all identified in Policy WLP2.4 as appropriate. However, higher-intensity B8 uses, such as 24 hours-a-day operation, would not be supported, given the proximity of existing and proposed residential dwellings.

Uses which support the cleantech (offshore wind/Sizewell C) industry will be particularly supported. Some new smaller/start-up employment units will be useful to deliver, if practicable. Hours of operation will be agreed as part of the planning application process, reflecting the use(s) proposed and the impact on neighbouring residential amenity.

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 so would be inappropriate for residential development.

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 not progress.

Current position on land use (continued)

Primary school and pre-school(s)

There is now considerable surplus capacity in nearby primary schools, due to falling birth rates. A primary school is part of the Brooke Marine planning permission, with a site location identified. However, on current projections by Suffolk County Council, this new school is no longer necessary for the Kirkley Waterfront site. Whilst the situation may change again in the longer term, so long as appropriate and safe walking/cycling routes to existing primary schools and East Point Academy are provided, no new/alternative primary school site will be required. New pedestrian crossings on Waveney Drive/Victoria Road are therefore required and funding for these will be secured primarily or entirely via planning applications by the developers of the Kirkley Waterfront sites. It is likely that three crossings will be necessary, in addition to the new signal-controlled crossing close to the Gull Wing bridge (which became operational in 2024).

Free pre-school hours for children aged 9-24 months have recently been introduced by the Government which is expected to increase demand for pre-school places. As there is an existing deficit of Early Years places in the Kirkley area, and therefore no capacity to cater for needs arising from this site, a full 30-place pre-school, expandable to 60 places if needed, is currently indicated as required on each of the three main sites – Jeld Wen, Brooke Marine and Sanyo/Survitec – as a result of the number of homes collectively proposed.

The locations must have good transport links to enable children to walk, cycled or be dropped off conveniently and safely. Each site will therefore need to ensure delivery of an appropriately-sized (0.22 hectare) pre-school on their landholdings, to meet Suffolk County Council's requirements.

The requirements for each site will be negotiated with Suffolk County Council through the application process, having regard to the wider development proposal(s) and the relevant Community Infrastructure Levy (CIL) tests.

The sites must be flat, regular shaped, fully serviced, be within Flood Zone 1, 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 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. Therefore, one or more of the pre-school site(s) could potentially be released for other uses, with housing the most likely alternative use.

Priorities for each site

This is a summary of the position for each of the main four residential-led parcels in the Kirkley Waterfront site. It is not an exhaustive list of all matters but covers most of the main elements, especially where there have been recent changes to the situation.

Jeld Wen (now called Statuslist)

This site was the former Jeld Wen factory, producing wooden doors, window frames and similar. It closed in 2010 and has been derelict since then, becoming increasingly run-down.

It is the subject of a planning application ([reference DC/24/2381/OUT](#)), which was received on 1st July 2024 and is still being determined at the time of writing. The outline application – slightly altered by the applicant in June 2025 – is now for 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 pre-school land (Class F1a use), with associated access, public open space, infrastructure and landscaping.



Disused sheds



Former industrial buildings

Map 4 Jeld Wen (now called Statuslist) site



Maxar, Microsoft | Esri Community Maps Contributors, Esri UK, Esri, TomTom, Garmin, Foursquare, GeoTechnologies, Inc, MET/NA

Jeld Wen (now called Statuslist) (continued)

Key matters

- A minimum of **2.2 hectares of employment land** along the quayside. Offices, research and development and industrial processes (use class E(g), (formerly B1)), general industrial (B2) and storage or distribution (B8) uses are all appropriate. However, given the proximity of existing and future residential dwellings, any B8 uses would need to be carefully controlled such as hours of operation to minimise the potential for amenity and disturbance impacts.
- Incorporate an **East-West cycling, walking and wheeling route** through the site, including connecting through to Colin Law Way and an appropriate connection to the Brooke Marine site to the west.
- A **secondary vehicular access** for emergency purposes may be needed (primary access is to be via Colin Law Way).
- Minimum 10% **Biodiversity Net Gain** to be demonstrated.
- A site of at least 0.22 hectares for a **30-place pre-school setting**, expandable to 60 places, should be provided. This must be in an accessible location for the dropping off and collecting of children and be within Flood Zone 1 through land-raising, if necessary. It should not be within the County Wildlife Site.
- A **Locally Equipped Area of Play (LEAP)** of approximately 400m² to be provided on site, plus additional green (open) space for informal recreation, indicatively about 1,800m², 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 remediation undertaken prior to the implementation of the development.
- An appropriate **Suitable Alternative Natural Greenspace strategy** must be prepared and implemented.
- Ensuring that there are alternative appropriate **habitats for the gulls** who currently nest and roost on-site to relocate to.
- Appropriate contributions to **improving cycling, walking and wheeling connections to primary schools**, East Point Academy, GP surgeries and other key services will be secured through section 106 or section 278 agreements. This will include contributing to a safe crossing point (or points) across Waveney Drive/Victoria Road.
- Residential land must be safe from tidal flooding (through land-raising if necessary), with a **Flood Risk Assessment** demonstrating how the 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).

Brooke Marine

This was formerly a major boat-building centre, but this ceased many years ago. The site contains the Brooke Business Park at its northern end which has various small businesses operating from buildings, including some boat hobbyists. It also includes virtually all of the Brooke Yachts and Jeld-Wen Mosaic County Wildlife Site.

Outline planning permission was granted in 2015 for a comprehensive residential-led mixed-use scheme (reference ([DC/2013/3482/OUT](#)), for up to 850 dwellings, up to 1,774m² commercial floorspace, a primary school, open space and new spine road access.

Subsequently, a reserved matters approval for a first phase of 69 homes was granted, with a Certificate of Lawfulness issued in April 2024 ([DC/24/0490/CLE](#)), which confirms that planning permission has been lawfully implemented and is extant.

The implementation was secured through the construction of concrete foundations on a single plot, but no substantive development has taken place, nor is any taking place, at the time of writing.

Due to various changes in finance costs, building regulations, materials costs and the like – allied to the fact that no substantive development has taken place since the consent was issued in 2015 - the Council's view is that the site is highly unlikely to be viable for the full consented re-development (although in theory it could still take place).

The Council therefore cannot insist on changes to the extant planning permission, so the main points below therefore relate to the Council's preference for the site now – in other words, a different re-development.

Map 5 Brooke Marine site



Brooke Business Park

Brooke Marine (continued)

Key matters

- 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, should be provided and should not be 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).
- The **permitted high-density residential development** on the northern 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.
- Incorporate an **East-West cycling, walking and wheeling route** through the site, connecting from the Jeld Wen site to the east, across the County Wildlife Site to the Sanyo site to the west.
- The **County Wildlife Site is of greater interest than previously assumed**, with veteran oak trees, woodland, scrubland and grassland habitats. However, due to lack of management, some of the more open areas of the scrub which are important basking habitats for common lizards are degrading in ecological interest. Notwithstanding the consented scheme for the site, the Council would now prefer that as much of the County Wildlife Site remains undeveloped, although managed better.
- **Green infrastructure** to be provided in appropriate parts of the site but taking advantage of the benefits of the County Wildlife Site for nature.
- **Retail units**, if proposed, should be within the southern part of the site.
- **Housing to be focused on the southern part of the site**. This must be accessed via the consented (but currently unbuilt) road through the Waveney Drive junction.
- A **Locally Equipped Area of Play (LEAP)** of approximately 400m² to be provided on site, plus approximately 1,800m² of **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 remediation undertaken prior to the implementation of the development.



Units on Brooke Peninsula

Brooke Marine (continued)

- Appropriate financial contributions to improving **cycling, walking and wheeling connections to primary schools, GP surgeries and other key services** secured through section 106 or section 278 agreements. This will include contributing to a safe crossing point (or points) of Waveney Drive/Victoria Road.
- Residential land must be safe from tidal flooding (through land-raising if necessary), with a **Flood Risk Assessment** demonstrating how the 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).
- **Minimum 10% Biodiversity Net Gain** will need to be demonstrated for any residential development not benefiting from the Certificate of Lawfulness.
- An appropriate **Suitable Alternative Natural Greenspace strategy** must be prepared and implemented.

Brooke Peninsula



Former playing field



Brooke peninsula and County Wildlife Site

Sanyo / Survitec

This site had various uses, but the main part of the site most recently accommodated the Sanyo television factory. This closed in 2009 and was purchased by the Council in 2016. A planning application to re-develop the site (reference [DC/15/2004/RG3](#)) for up to 300 dwellings, open space, a football pitch, a play area and various other elements was granted permission, and the former buildings were demolished. However, the permission was not implemented and lapsed in 2018. There are no current definitive proposals for the site.

The former Survitec site (immediately to the north of the Sanyo West site and also owned by the Council) had some small commercial uses in the past and was most recently used temporarily for vehicle storage/parking, which ended in 2024.

In October 2023, the Council secured £4.2m of Government funding to remove ground contamination and prepare a new plan for the site. [Initial public consultation](#) – by the Council as landowner – on what should be considered for the site ran from July to August 2024 and pre-application discussions are continuing with the Council (as planning authority).

View across Sanyo east



Hardstanding at Survitec



Map 6 Sanyo / Survitec site



Key matters

- **Vehicular access** should be via School Road and/or Heath Road, with the precise distribution to be determined at the planning application stage.

- A site of at least 0.22 hectares for 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 (through land-raising, if necessary).

Sanyo / Survitec (continued)

- Incorporate an **East-West cycling, walking and wheeling route** through the site, including connecting through from the Brooke Marine site to the Scenic site, with onward connections to Stanley Road.
- Appropriate **contributions to improving cycling, walking and wheeling connections to primary schools, East Point Academy, GP surgeries and other key services** secured through section 106 or section 278 agreements This will include contributing to a safe crossing point (or points) of Victoria Road.
- A **Locally Equipped Area of Play** (LEAP) of approximately 400m² to be provided on site, plus approximately 1,800m² of 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.
- Residential land must be **safe from tidal flooding** (through land-raising if necessary), with a Flood Risk Assessment demonstrating how the 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).
- **Minimum 10% Biodiversity Net Gain** to be demonstrated.
- An appropriate **Suitable Alternative Natural Greenspace strategy** must be prepared and implemented.

Building on Sanyo west



Building on Sanyo west



Scenic (former SCA Recycling site)

This site is in current use as a storage site for the Scenic company, which provides stage scenery. It is a concrete and tarmac-covered site with shipping containers on it. No application has been made to change to residential use, although there have been recent pre-application discussions with the Council.

Key matters

- **Vehicular access should be via Nelson Wharf**, unless (or as well as) an alternative could be secured through to School Road via the Sanyo site. Improvements to Nelson Wharf may be necessary to facilitate this. Access via Stanley Road will not be appropriate or acceptable (except for walking and cycling).
- Appropriate **financial contributions towards pre-school places** will be necessary.
- Incorporate an **East-West cycling, walking and wheeling route through the site**, including connecting from Stanley Road through to the Sanyo site to the east.

Containers on Scenic site



Map 7 Scenic (former SCA Recycling) site



- Appropriate **contributions to improving cycling, walking and wheeling connections to primary schools, GP surgeries and other key services** secured through section 106 or section 278 agreements. This will include contributing to a safe crossing point (or points) across Waveney Drive/Victoria Road.
- Proportionate **financial contributions towards open space and play space** (to be delivered elsewhere on the Kirkley Waterfront site) will be required.
- A full **contamination survey** with appropriate remediation play undertaken prior to the implementation of the development.
- Residential land must be **safe from tidal flooding** (through land-raising if necessary), with a Flood Risk Assessment demonstrating how the 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).
- **Minimum 10% Biodiversity Net Gain** to be demonstrated.
- An appropriate **Suitable Alternative Natural Greenspace strategy** must be prepared and implemented.

Riverside Business Park

The site is largely occupied by employment uses, but the Riverside area also includes educational provision and car sales.

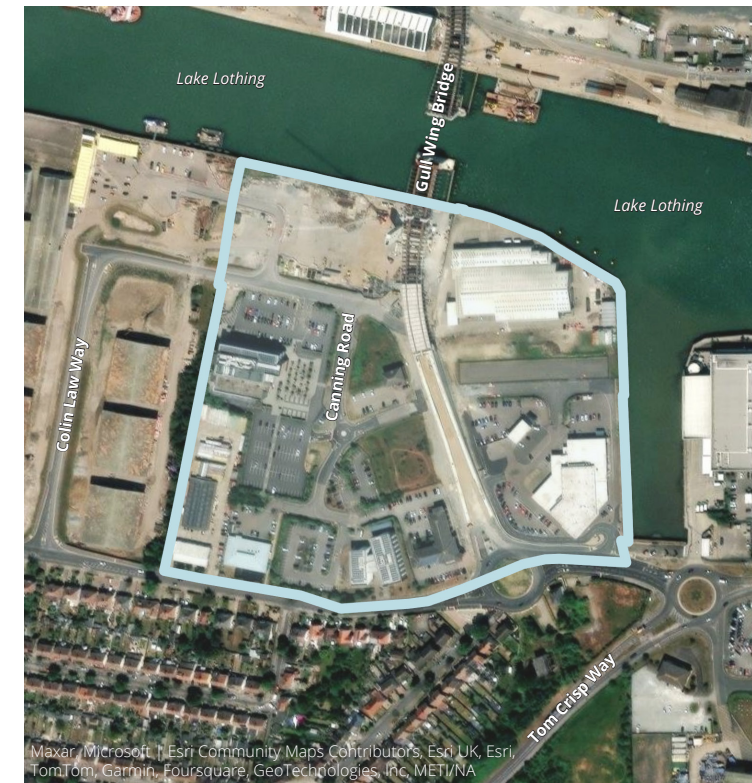
Much of the Riverside area is in active use, but there are some vacant areas, including along the waterfront, which had previously been used for construction management of the Gull Wing bridge.

There may be potential for some of the land to accommodate Sizewell C and/or offshore/ cleantech energy related uses, as well as other types of employment.

Key matters

- **Employment uses will be retained**, and future employment development (B2, B8 and E(g) planning use classes) will be supported.
- Incorporate an **East-West cycling, walking and wheeling route through the site**. Much of this has already been provided along Colin Law Way. Further connectivity to the Gull Wing bridge and beyond to the Bascule bridge should be contributed to if practicable.
- **Vehicular access** shall utilise Colin Law Way.
- New development would be expected to undertake appropriate **contamination surveys and flood risk assessments**.
- New development would be expected to provide a **minimum 10% Biodiversity Net Gain** as appropriate.

Map 8 Riverside Business Park



Riverside building

Streets and transport

This Planning Position Statement and the associated planning policies and documents support the delivery of development with a well-connected and effective transport network.

Relevant policies, guidance and documents

The design of the transport network and the streets should draw upon the following documents which have been adopted more recently than those quoted in the Kirkley Waterfront SPD.

- [WLP8.21 Sustainable Transport](#)
- [Manual for Streets 2019](#)
- [Suffolk Design Streets Guide](#)
- [Local Transport Note 1/20 Cycle infrastructure design \(LTN 1/20\)](#)
- [East Suffolk Cycling and Walking Strategy](#)
- [Healthy Environments Supplementary Planning Document](#)
- [Kirkley Waterfront Transport Access Study Technical Note 2025, WSP](#)

Much of the guidance and principles provided in the Sustainable Urban Neighbourhood and Kirkley Waterfront SPD and the Waveney Local Plan remain relevant.

The location of the Kirkley Waterfront site provides significant opportunities for development to maximise the use of sustainable transport. The site is located close to the town centre, two train stations (Lowestoft and Oulton Broad South) and local bus routes. Proximity to other services and job opportunities within Lowestoft would also enable development to provide good cycling, walking and wheeling facilities, as well as access to public transport.

The site's transport network should promote sustainability through cohesive cycling, walking and wheeling connectivity, for movements both within the site and to / from the site.

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.



Access to Survitec and Quayside Business Centre



Looking west along Brooke Business Park

Current position on streets and transport

Access

It is critical that there are good linkages for cycling, walking and wheeling between different parts of the Kirkley Waterfront site. The indicative vehicular network plan in the Kirkley Waterfront SPD provides a good guide to how this can be achieved, but alternative layouts may also be acceptable.

When certain development thresholds have been reached, the Kirkley Waterfront SPD requires the stopping-up of existing roads (Heath Road, School Road and Nelson Wharf) to through traffic and the traffic flows for the majority of the site (excluding the Jeld Wen factory site and Riverside Business Park) coming through a single access point on Waveney Drive, via the former playing field.

This has been reviewed and updated by transport consultancy WSP in 2024/2025. Their report reflects the current position (such as the opening of the Gull Wing bridge in September 2024) and included a camera traffic survey of the key junctions in October 2024.

Whilst the position is complicated due to the variety of existing uses, permitted uses and allocated uses, the key conclusions are:

- The junctions of Heath Road, School Road, Nelson Wharf and Stanley Road with Victoria Road have limited visibilities. (The Colin Law Way/Waveney Drive junction was not assessed by WSP and is assumed by the Council to be satisfactory in principle).
- Existing traffic volumes and movements – and future baseline traffic growth to 2034 – are well below capacity thresholds.
- The current accident record in the area is very low, although specific proposals will, of course, need to be assessed for safety implications.
- Without the new Brooke Marine road, there is a risk that the Heath Road/ Victoria Drive junction would be operating over capacity in the AM and PM peak times with development.
- The new Brooke Marine road junction may operate over the junction capacity (depending on the ultimate scale of growth served by the road).
- Some appropriate redistribution of traffic flows from Heath Road to School Road would assist in maximising capacity, and this would largely affect the Sanyo site.
- Demand reduction measures (such as improved cycling, walking and wheeling provision) would assist in reducing pressure.
- Various Traffic Regulation Order (TRO) measures – such as (but not necessarily including) extending some double yellow lines – could also assist with better management of traffic.

Current position on streets and transport (continued)

Access (continued)

The Transport Access Study Technical Note (2025) produced by WSP shows that should development from the Scenic site, Sanyo site and residential development from the Brooke Marine site go through Heath Road and School Road, in the following scenario both junctions were within capacity:

- Victoria Road / School Road – 175 inbound and 378 outbound development trips in the AM peak hour, and 333 inbound and 190 outbound development trips in the PM peak hour.
- Victoria Road / Heath Road – 127 inbound and 208 outbound development trips in the AM peak hour, and 164 inbound and 115 outbound development trips in the PM peak hour.

- It should be noted that any residential development on the Brooke Marine site would be expected to go through a new access road and it would be unacceptable for its traffic to use Heath Road and School Road meaning the number of dwellings requiring use of Heath Road and School Road will be less than modelled.

The Council's reflections on the WSP findings are:

- Traffic flows from the Sanyo site are likely to need to be focused primarily (but not necessarily exclusively) along School Road, rather than Heath Road.
- Enhanced walking and cycling connectivity are vital, including the East-West cycling, walking and wheeling route (and are allowed for in this Planning Position Statement) and some parking reduction measures may also be necessary.
- Appropriate TRO measures may need to be considered for Heath Road and School Road to enhance the flow of traffic.

- Any opportunities to improve the junction visibilities of Nelson Wharf, School Road and Heath Road with Victoria Road should be taken, where practicable.
- The December 2024 National Planning Policy Framework states (in paragraph 116) that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety or residual cumulative impacts on the road network would, following mitigation, be "severe". Whilst this can only be determined through the consideration of individual planning applications, these thresholds are high and not frequently exceeded. The fact that there could be some congestion at peak times does not automatically mean that the impacts would be unacceptable – Kirkley Waterfront is an allocated, urban site and there is already some congestion, especially westbound on Victoria Road in the evening rush hour.

Current position on streets and transport (continued)

Vehicular network

The principal routes in the Kirkley Waterfront area need to provide access for private cars, heavy goods vehicles, cyclists and pedestrians. This reflects the residential, employment and tourism uses on the site. Roads accessing employment sites should be appropriately wide to enable access for HGVs. There must also be consideration given in proposals how the amenity of dwellings near roads frequented by HGVs can be safeguarded.

Pedestrian and Cycle Network

The indicative pedestrian and cycle network plan within the Kirkley Waterfront SPD provides a good guide to how this could be achieved. Alternative layouts may also be acceptable, but any approach will require a cohesive network and co-operation between landowners.

Pedestrian and Cycle Bridge

The costs associated with building a new cycle and pedestrian bridge across Lake Lothing at Brooke Peninsula connecting to Normanston Park has increased significantly since the adoption of the Kirkley Waterfront SPD. The provision of such a bridge is no longer viable – and it has been removed in the 2023/24 Infrastructure Funding Statement – so other improvements are required. The Gull Wing bridge allows connectivity to north Lowestoft for cyclists and pedestrians through dedicated cycle/pedestrian paths on each side of the road and so it is essential that there is connectivity to it from the site – in practice this means connecting to Colin Law Way, from where the roads can be followed to the bridge. Other connectivity improvements are explained in this chapter.

Waterfront Pedestrian/Cycle Path

Care will need to be taken to ensure the twin objectives of both public and business access to the waterfront can be satisfied as much as possible. It will be important that any waterfront access in this location does not create health and safety issues for the operation of the marina/quay and businesses on the quayside. A cycling, walking and wheeling path along the waterfront will therefore not be possible for most of Lake Lothing edge for this reason.

To mitigate the inability to deliver a cohesive waterfront path across the entire Lake Lothing frontage, access points to the waterfront should be considered that enable views of/across Lake Lothing. These access points should be linked to the central East-West cycling, walking and wheeling route and Suitable Alternative Natural Greenspace (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.

Current position on streets and transport (continued)

Indicative East-West Cycling, Walking and Wheeling Route

Fundamental to the delivery of the overall site and ensuring it is sustainable and well-connected is a central, spinal cycling, walking and wheeling route which connects every land parcel, including areas largely already developed such as the Riverside Business Park and ensures services and facilities situated within the site are accessible to its residents.

The route will be expected to be a pleasant environment and should be fully compliant with the latest version of Local Transport Note 1/20 (or any superseding document). The route should be coherent, direct, safe, comfortable and attractive.

It is inevitable that the East-West cycling, walking and wheeling route will cross over the motorised vehicular network at times. Where this occurs the hierarchy of users as defined in the Manual for Streets should be considered and priority given to pedestrians and cyclists over motor traffic where appropriate and safe to do so. The Suffolk Design Streets Guide and LTN1/20 contain some guidance on this.

The East-West cycling, walking and wheeling route should be a 'Green Route', as described in the Healthy Environments SPD: Green Routes are active travel routes which are 'set in high quality, landscaped, natural settings.' They are intended to provide nature immersion for the benefit of users and be accessible and inclusive. The green route should also incorporate 'Play on the Way' (see Open Space in 5 Chapter of this Position Statement). Green Routes can contribute to the overall open space requirement, but not the play space requirement.

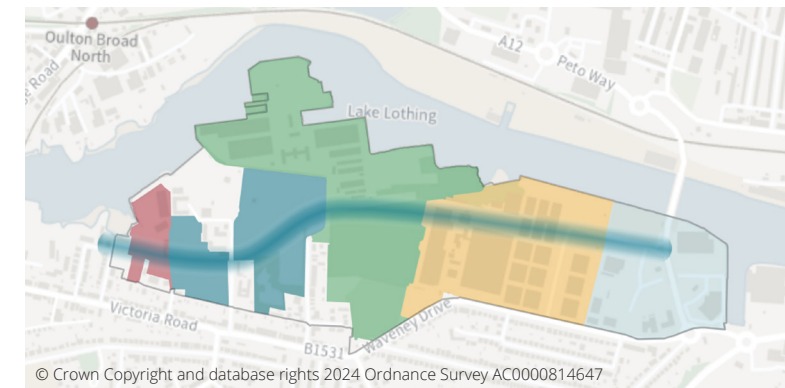
Where the route crosses the County Wildlife Site, a Public Path Order or similar will be considered to ensure a cohesive route can be achieved to connect both the Sanyo and Jeld Wen land parcels if this cannot be secured by agreement.

A coherent and legible series of wayfinding that promotes the identity of the Kirkley Waterfront site should be provided across all sites.

Where important infrastructure is provided within the Kirkley Waterfront site (i.e. open space, pre-schools etc) routes from this key, central cycling, walking and wheeling route to these destinations should be provided. In addition, it is expected that the route will connect into the Gull Wing bridge on the east side which will improve wider connections to services and facilities north of Lake Lothing.

Such is the importance of this route that its delivery should be as early in the development as possible for each parcel of land.

Map 9 Indicative East-West cycling, walking and wheeling route



Current position on streets and transport (continued)

Cycle Parking

Safe and secure cycle parking and storage facilities are an important part of encouraging residents and employees to cycle and ensure that it is an attractive transport option. Developments should therefore seek to encourage cycling, walking and wheeling and reduce reliance on private vehicles. A lower level of parking provision than the standards in the latest Suffolk County Council Parking Guidance (2023) or any successor document, may be appropriate/necessary, to encourage more sustainable travel. Any reduction of vehicular parking within the site to below Suffolk County Council Parking guidance should therefore be offset by additional cycle parking.

To ensure that cycling is an attractive option development should also provide safe and secure cycle parking and storage in public areas.

Vehicular Parking

The design of car parking is important to the overall quality of a development. Car parking should not dominate the public realm. It should also not impede the movement of cyclists and pedestrians, either by blocking desire lines or lines of sight. A mix of on-street and/or visitor parking should be provided. A small number of public car parking places should also be provided, with drop-off points. However, this should not detract from the overall coherence of the street scene.

Well-accessed and appropriately designed vehicular drop-off points for each pre-school must be provided.

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 is likely to be a need for shelters, real-time passenger information displays and hardstanding, where feasible.

It is important that the individual developments are designed to provide direct and attractive cycling and walking routes to these bus stops 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 (S106 agreement) to increase bus frequencies along Waveney Drive/Victoria Road.

Current position on streets and transport (continued)

Design of new roads

The Suffolk Design Streets Guide provides a template for the design of different categories of roads in new developments. The main new road access from Waveney Drive, which will be located on the Brooke Marine site and is included through the 2015 permission, should be designed to meet the standards of a primary carriageway. The standards for primary carriageway provision are:

- 30 mph speed limit
- Minimum 6.5 metres in width
- Discourage on-carriageway parking

Connecting roads, which link the main access route to smaller residential roads, should be designed and built according to the standards within the Suffolk Design Streets Guide.

Crossing Points

Road crossings within the Kirkley Waterfront site should be located as close as possible to key cycling, walking and wheeling routes through the site, to retain 'desire lines' (shortest possible connection distances). This means that crossings will often be located close to road junctions. They should prioritise the movement of cyclists and pedestrians over motorised vehicles.

The use of appropriate materials and raised surfaces will help to make crossings safe and attractive to use and increase awareness among other road users.

Road crossings across Waveney Drive/ Victoria Road will be vital in ensuring that the site is appropriately connected to services, employment opportunities and broader transport networks in south Lowestoft.

Safe and convenient cycle and pedestrian access will be required to key services such as East Point Academy and local primary schools, which are located to the south of the Kirkley Waterfront site, as well as recreational facilities.

The crossings should be at strategically important locations and must be of an appropriate type for the scale of anticipated use and location. A minimum of three crossings, broadly spread out across the southern edge of the site, are likely to be necessary.

Appropriate contributions must be made towards the crossings by the developers, with the details to be discussed through individual planning applications.

In relation to the Brooke Marine site, the Section 106 agreement to the 2015 planning permission allows if that the financial contribution towards the Pedestrian and Cycle Bridge has not been spent within 10 years of being paid, then it may be spent on other sustainable transport projects directly mitigating the impacts of the site. As this bridge will no longer be provided, it is therefore proposed that this contribution instead be put towards a new pedestrian crossing in the vicinity of the site.

Current position on streets and transport (continued)

Connectivity to be provided (to outside the site)

Good connectivity to the immediate surrounding area will be necessary, with the details to be discussed and negotiated through individual applications. This will in turn provide better, safer access to the town centre, Normanston Park (for sports/leisure activities), north Lowestoft and North Quay Retail Park. There should also be improved access to Oulton Broad (as far as is practicable), which has various shops and services close to western parts of the site.

The delivery of the East-West cycling, walking and wheeling route through the site will be fundamental in ensuring that any access/routes to external services will be safely accessible to all residents throughout the site.

Cycle and pedestrian routes should be extended to provide access to important services that are located outside of the Kirkley Waterfront site, and particularly to provide safe access to nearby primary schools in south Lowestoft. These include Dell Primary School, Phoenix St Peter Academy Primary School and Red Oak Primary School. Safe cycle and pedestrian connections to East Point Academy on Kirkley Run are also critical.

GP surgeries in south Lowestoft should be safely accessible for cyclists and pedestrians from the Kirkley Waterfront site, especially the Victoria Road Surgery and the Kirkley Mill Health Centre.

Due to narrow footpaths and houses close to the road edge along most of its length, meaningful improvements to Victoria Road (to introduce/widen cycle paths) are not practicable.

Cycling and walking route adjacent Victoria Road



Open space, biodiversity and green infrastructure

This Planning Position Statement, associated planning policies and documents support the delivery of attractive and well-located green infrastructure which enhances wildlife habitats, biodiversity and contributes to the health and wellbeing of the surrounding communities.

Relevant policies, guidance and documents

- [WLP8.30, Design of Open Spaces](#)
- [Healthy Environments SPD](#)
- [Biodiversity Net Gain Interim Planning Guidance Note for Suffolk \(2023\)](#)
- [Waveney Local Plan Habitats Regulations Assessment](#)
- [MAGIC site](#)
- [RAMS SPD \(2021\)](#)
- [Playing Pitch & Outdoor Sports Strategy & Action Plan 2021](#)
- [Wilder Ecology report on the condition of the Brooke Yachts and Jeld Wen County Wildlife Site \(2024\)](#)

Green infrastructure such as green open spaces, green routes, well-designed Sustainable Drainage System (SuDS) features and equipped play provision are now considered essential within residential developments and will provide areas for recreation, relaxation and also support 'nature immersion'.

Due to the urban location of the site, open space in the surrounding area is particularly limited. It is therefore important that this is a prominent feature in the design of any development on this site.

Much of the open space and biodiversity principles and guidance provided in the Sustainable Urban Neighbourhood and Kirkley Waterfront SPD and the Waveney Local Plan remain relevant. However, there have been some significant changes which would need to be considered in new applications such as Biodiversity Net Gain and RAMS requirements, as well as evolving habitats.

The Brooke Yachts and Jeld-Wen Mosaic County Wildlife Site contains some mature woodland (including some veteran oak trees), heathland/scrubland and grassland, and includes the only natural shoreline on the southern side of Lake Lothing. It is central to the Kirkley Waterfront site as a whole and has ecological value, although due to degradation, requires better management to improve the habitats for birds and reptiles within.

Current position on open space, biodiversity and green infrastructure

Brooke Yachts and Jeld-Wen Mosaic County Wildlife Site

The County Wildlife Site (CWS) is central to the site and extends to the edge of Lake Lothing. The CWS is designated for its open mosaic habitat (which is only found on previously developed land) and intertidal mudflats (priority habitats). The site supports an 'exceptional' population of common lizards (making it a Key Wildlife Site) and supports an important bird population due to its mosaic of grassland, gorse scrub and woodland. The woodland contains some veteran oak trees. Suffolk Wildlife Trust conducted a report on the condition of the CWS in 2024 and this is linked to above.

In recent years, due to lack of management, the habitat has degraded somewhat as scrub has encroached on the majority of the grassland areas. Ongoing management is required to manage areas of scrub and maintain the open grassland (for which the CWS is part-designated).

The consented scheme allows for some loss of parts of the CWS. However, the Council's view is that the consented scheme for Brooke Marine is very unlikely to be viable in totality. In an alternative scenario envisaged by the Council, the only acceptable loss will be for creating essential roads and/or paths through the site. Enhancement of retained areas of CWS must offset the loss of areas needed for roads and/or paths.

Footpath links will be required through and/or around the CWS, particularly as part of the East-West cycling, walking and wheeling route spanning the Kirkley Waterfront site. There is currently no public access into the CWS; therefore, measures will be required to protect the site and its wildlife whilst also allowing some public access to enjoy nature. Appropriate artificial lighting will need to be provided to ensure the safety of cyclists and pedestrians using the routes, whilst mitigating the impact of lighting on wildlife and ecology.

An up-to-date habitat management plan will be required to set out the paths through the CWS. These paths should be fenced to prevent public and dog access into more ecologically sensitive areas of the CWS. The site should be managed to benefit nature as well as the public, signage informing the public of the wildlife on site, reptile hibernacula (hibernation structures) and dead wood loggeries for insect interest.

As part of the planning of essential paths and/or roads, any contamination discovered by surveys will need to be appropriately remediated.

The Jeld Wen site immediately borders the CWS (which is to the west). This re-development must demonstrate that it does not impact adversely on the CWS, should the section of the East-West cycling, walking and wheeling route through the Brooke Marine section not be created at the same time (or at all). Public access therefore must be prevented from future houses/gardens through the construction of secure fencing, with no gates.

Current position on open space, biodiversity and green infrastructure

Gulls

On the site there are currently about 900 breeding pairs of herring gull and lesser black-backed gull. They are primarily concentrated on the roofs of the former timber storage yards on the Jeld Wen factory site, which are proposed to be re-developed for housing. These species are both Birds of Conservation Concern ("Red List" species) due to declining numbers.

It may well be necessary to provide replacement habitats (permanent and, if necessary, also temporary) to enable the gulls to relocate to appropriate locations within the relevant part of the Kirkley Waterfront site. Redevelopment of the site will therefore need to consider the habitats of gulls, particularly during the nesting season, and a full survey of gull habitats will be required, with suitable mitigation secured on the basis of this information.

Biodiversity Net Gain

Biodiversity Net Gain (BNG) requires development to have a positive impact (net gain) on habitats for wildlife, and ensure they are in a better condition than before development occurred. BNG requirements became mandatory in February 2024, with a minimum 10% gain required for any new planning permissions. It may also be required for any revised development plans on the Brooke Marine site, although the extant 2015 planning permission would not trigger the need for BNG if non-material amendments and/or variations of condition submissions were made.

The BNG hierarchy is expected to be followed on all the component sites, and consideration should be given to how effective BNG delivery could be co-ordinated across the sites with the aim to deliver gains on-site where practicable.

The majority of the habitats across the site are of low ecological value (hardstanding), although there are some areas of high value, including the CWS and the priority woodland and open mosaic habitats on the Sanyo site. Whilst 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 may be impacted by on-site BNG provision.

Current position on open space, biodiversity and green infrastructure

Habitat Regulations Assessment

A Habitat Regulations Assessment is needed to assess the risks to/mitigation towards, internationally designated nature conservation sites caused by developments. The Waveney Local Plan had a full [Habitats Regulations Assessment](#), including Appropriate Assessment, to support its development and adoption, which includes the allocation of the Kirkley Waterfront site.

There are some nationally/internationally designated nature conservation sites relatively close (such as some within the Broads National Park). However, it was concluded that, subject to application-level Appropriate Assessments and the Recreational Disturbance, Avoidance and Mitigation Strategy (RAMS) payments, any impacts on such nature conservation sites could be mitigated appropriately. Therefore 'shadow' HRAs must be provided with relevant planning applications, detailing how they will manage potential impacts on internationally designated nature conservation sites (Special Areas of Conservation (SACs), Special Protection Area (SPAs) and Ramsar sites).

Playing field

The existing Jeld Wen football pitch has not been in use for more than 10 years and has planning permission to be re-developed for homes as part of the Brooke Marine consent. The Council has delivered recent improvements to the Barnards Meadow football complex, close by to the north of Lake Lothing. Additionally, a new 3G pitch at the Benjamin Britten High School was opened in early 2025. Any further new football pitches in the town would be better delivered on the Oakes Farm site in Carlton Colville (Policy WLP2.19), which is a large sports-led allocation with a variety of full-sized, youth and mini football pitches allocated (amongst other sporting facilities). Therefore, there will no longer be a need to develop a formal match-standard football pitch on the Kirkley Waterfront site. However, included within the open space should be open grassed area for informal recreational uses, which should ideally be at least 90m x 60m. This should preferably be on a single site, but as this does not appear likely to be delivered by agreement amongst the main landowners, it should be disaggregated into 3 x 1,800m² parcels.

Urban Greening Factor

Natural England recognises that applying the principles of [Urban Greening Factor](#) (UGF) can be a beneficial approach to measuring on-site greenspace (especially for brownfield sites). It can also help demonstrate how some of the mitigation measures will contribute to SANG. Features that can improve the factor (score) include rain gardens, green roofs, trees and semi-permeable paving, and some of these elements would obviously also contribute to a more attractive local environment.

The recommended minimum UGF value for predominantly residential development is 0.4 and for predominantly commercial development is 0.3. The Council cannot insist on these figures being achieved, because this is not an adopted policy requirement and it may well not be achievable anyway, but application of the UGF approach is supported for each of the component sites.

Current position on open space, biodiversity and green infrastructure

Open and play space provision

As set out in Chapter 2 Land Use, each site will therefore need to provide an appropriate area of open space/play space. For all sites (except the Scenic site) this should include an Area of Play and appropriate buffers (trees/fencing/landscaping) around that area. The Jeld Wen and Sanyo & Survitec sites will also need to accommodate appropriate recreational/green space, as will the Brooke Marine site (this is included in the existing planning permission). The Scenic site, being the smallest, will need to make appropriate provision too, but this may be in a different form, perhaps solely 'Play on the Way'.

All sites will need to provide appropriate 'Play on the Way' provision adjacent to main walking (green) routes.

Play provision is to be delivered before 50% occupancy on each separate site (as per the Healthy Environments SPD).

Applicants will need to refer to the Open Space methodology contained in the Healthy Environments SPD for detailed guidance on play provision requirements. Appropriate provision to accommodate all ages should be secured on the site as a whole – this might mean that play provision in one site is focused on younger children, whilst another site caters more for older children/youths, for example. If a Multi-Use Games Area (MUGA) is not provided somewhere on the site as a whole, then alternative provision for more 'active' pursuits should be provided.

SuDS can qualify towards the overall open space provision but to do so must be integrated into landscape and designed to be fully and safely accessible (see p77 of the Healthy Environments SPD and Chapter 7 Flood Risk Management).

Sanyo east



Current position on open space, biodiversity and green infrastructure

Recreational Disturbance and Avoidance Mitigation Strategy (RAMS) and Suitable Alternative Natural Greenspace (SANG)

The [Recreational Disturbance and Avoidance Mitigation Strategy \(RAMS\) SPD](#) was adopted in 2021. This requires the payment of a defined per-dwelling sum to mitigate the impact of recreational disturbance from increased visitor numbers on nearby SACs, SPAs and Ramsar sites, unless bespoke mitigation is proposed and acceptable. The RAMS SPD makes clear, however, that for any site of 50+ dwellings (which is all the main four component sites) the mitigation must be a combination of RAMS payment and demonstrable on-site/off-site measures.

Suitable Alternative Natural Greenspace (SANG) is not required as part of the Waveney Local Plan allocation policy for the site. However, ensuring that there are appropriate dog-walking paths is important. Dog ownership levels are expected to be lower than an equivalent greenfield site due to the location of the site and the expected sizes and types of dwellings.

As an urban site in multiple land ownerships, however, with the many physical constraints of the site and viability challenges, it is extremely hard to envisage achieving a single co-ordinated and delivered SANG route.

Fen Park and (from October-April) the South Beach are the nearest public spaces where dogs can be exercised off-lead, and whilst they are both relatively close, neither are immediately accessible. Therefore, as a full 2.7km SANG route for the site as a whole is considered to be undeliverable, each individual site application will need to demonstrate, through its shadow HRA, how appropriate recreation provision will be secured.

Connections to nearby recreation facilities should be enhanced through improved cycling/walking links and safe crossings of Victoria Road/Waveney Drive and/or via the Gull Wing bridge.

Where improvements to any existing nearby greenspaces (including access improvements) are considered to be necessary, as part of mitigation measures, they will need to be costed and secured through a S106 agreement. They will need to be secured at the outline application stage rather than the reserved matters stage.

The Healthy Environments SPD (Table 15 and supporting text) contains further details of how SANG should be addressed.

Urban design guidance

This Planning Position Statement and the associated planning policies and documents support the delivery of development with a high quality of design, construction, and energy efficiency.

Relevant policies, guidance and documents

- [WLP8.28 Sustainable Construction](#)
- [WLP8.29 Design](#)
- [WLP8.30 Design of Open Space](#)
- [WLP8.31 Lifetime Design](#)
- [Sustainable Urban Neighbourhood and Kirkley Waterfront Development Brief SPD](#)
- [Sustainable Construction SPD](#)
- [Historic Environment SPD](#)
- [Healthy Environments SPD](#)
- [National Design Guide](#)

The historic character of the site and its location next to Lake Lothing provide opportunities to design imaginative and high-quality buildings and spaces.

The prominent location of this site, situated close to Lowestoft town centre, means that good quality design is important. Much of the design guidance and principles provided in the Sustainable Urban Neighbourhood and Kirkley Waterfront Development Brief SPD remains relevant. Where possible the design of the development is encouraged to reflect the site's industrial and maritime history. Design should incorporate high quality landscape schemes on all sites, which include green spaces and are in keeping with the surrounding area.

Current position on urban design guidance

Sustainable Design

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 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 National Planning Policy Framework 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.

Current position on urban design guidance (continued)

Context driven design

The design should reflect the site's industrial and maritime history as well as the character of the wider town.

This can be achieved through the size, scale and mass of buildings, the aesthetics of the buildings design, the palette of materials used for the buildings, or through the name of streets, design of street furniture or surfaces, or some physical educational panels.

Lake Lothing

The development should address Lake Lothing as a focal point and provide access points where possible, with views across the water. A variety of uses should be incorporated along the waterfront, views should be directed towards the water, and density should be higher (including taller buildings) to make the most of the waterfront views.

Overarching character and identity

It is important that the whole site has an overarching identity, rather than each land parcel "reading" as separate developments. This does not mean uniformity, as a variety of designs is important to provide interest - it can be achieved through the design of street furniture or surfaces as well as building design. Distinctive buildings should be provided at crossroads, junctions and corners to create local focal points to assist with legibility and wayfinding as well as helping to define the character of the development.

Connectivity

As mentioned in Chapter 4 Streets and transport, there should be high connectivity across the site, particularly in terms of cycling, walking and wheeling. This should include connections between each part of the site, and links to the East-West cycling, walking and wheeling route across the whole allocation.

Pedestrian scale design

It is important that the buildings on the site interact positively with the surrounding streets. All dwellings should have active frontages facing onto the street with unoccupied ground floor spaces to the front of properties (i.e. integrated garages) kept to a minimum. Active frontages help to provide natural surveillance as well as providing interest and activity. Non-residential buildings also need a 'public face' and buildings can be used to provide a barrier for security and noise mitigation rather than relying on expanses of walls/fencing.

Suffolk Design Management Process / Suffolk Design Review Panel

Developers should follow the Suffolk Design Management Process when progressing the design. Early and consistent engagement with the Council helps to increase certainty and confidence in the planning process and allow timely consideration and decision making. Engagement with the Suffolk Design Review Panel is also strongly encouraged.

Flood risk management

This Planning Position Statement and the associated planning policies and documents support the delivery of development with appropriate regard to flood risk and drainage.

Relevant policies, guidance and documents

- [WLP8.24 Flood Risk](#)
- [WLP8.28 Sustainable Construction](#)
- [Strategic Flood Risk Assessment for Waveney and Suffolk Coastal \(Level 1 and Level 2, 2018\)](#)
- [Sustainable Urban Neighbourhood and Kirkley Waterfront Development Brief SPD](#)
- [Cumulative Land Raising Study 2008](#)
- [Flood risk assessments: climate change allowances \(Environment Agency\)](#)
- [Lead Local Flood Authority guidance on SuDS](#)

Much of the guidance and principles provided in the Sustainable Urban Neighbourhood and Kirkley Waterfront Development Brief SPD and the Waveney Local Plan remain relevant.

Significant parts of the site are within Tidal Flood Zone 3, which means it is at risk of flooding from up to a 0.5% annual probability flood event. Parts of the remainder of the land are in Flood Zone 2, especially in the east and north (at risk from a 0.5% to 0.1% annual probability flood event). Most of the more southern and western parts are in Flood Zone 1 (lower than a 0.1% annual probability of flooding). Although most of the site is not at risk of surface water flooding, there are parts at low risk and smaller areas at medium and high risk.

In the absence of flood defences or ground raising, parts of the site have the potential, in future, to become Flood Zone 3b once climate change is taken into account. The Council and developers need to consider this when developing a mitigation strategy, taking into account the future sustainability of the land on which the development is sited with regards to the appropriateness of the land use vulnerability class (Annex 3 of the National Planning Policy Framework) to the Flood Zone (Table 2 of the Flood Risk and Coastal Change Planning Practice Guidance) and the advice given in paragraph 172(d) of the National Planning Policy Framework.

Climate change and associated sea-level rise is worsening the position and the extent of the zones changed when the Environment Agency published [updated Flood Risk maps](#) on 25th March 2025; these should be referred to. This needs to be reflected appropriately in scheme design.

Current position on flood risk management

Sequential test

Given the sustainability benefits of regenerating this brownfield site, it is allocated in the Waveney Local Plan and so the sequential test was passed as part of the Local Plan process. Unless different uses are proposed than set out in the policy, then the sequential test will not need to be applied again in relation to planning applications.

Flood resilience and mitigation

The resilience and mitigation measures set out in paragraphs 8.8-8.14 of the Kirkley Waterfront SPD all apply, although the references in the SPD to PPS25 and the PPS25 Practice Guide have been superseded by the National Planning Policy Framework and Planning Practice Guidance.

The Waveney and Suffolk Coastal (Level 2) Strategic Flood Risk Assessment (2018) recommendation on flood resilience should be considered alongside flood resilient approaches and measures under Planning Policy Guidance paragraphs 068 and 069.

Exception test

The requirements of paragraph 178 of the National Planning Policy Framework will apply. That the development would provide “wider sustainability benefits” should be straightforward to demonstrate, given its allocation in the Waveney Local Plan. It will also need to be demonstrated through the Flood Risk Assessment (and, as appropriate, the Design and Access Statement) that the development will be safe for its lifetime, taking into account the vulnerability of its users, without increasing flood risk elsewhere. Lifetime is assumed to be 100 years for residential development and 75 years for other development.

The Anglian climate change allowances, published by the Environment Agency/ Defra and most recently updated in May 2022, must be applied within Flood Risk Assessments (although it is noted that these may change again in the future, so the most recent allowances must always be used). National Flood Risk Standing Advice is for developments to work to a freeboard value (“safety margin”) of 600mm. The

Environment Agency is satisfied that the 2018 coastal modelling in this location can support and justify the lower freeboard value of 300mm, so whilst it generally recommends that developers work to the higher freeboard level to improve flood resilience, this is not required on the Kirkley Waterfront site.

Surface water flooding

Consideration of SuDS early in the design process for development, including at the pre-application or master-planning stages, can lead to better integration, multi-functional benefits and reduced land-take (see the [PPG on SuDS](#)).

Surface water and foul drainage strategies must be an integral part of the design of each component site from the earliest stages, rather than being “retrofitted” after (say) the location of housing has been “fixed”.

Current position on flood risk management (continued)

Land-raising

Land-raising will be necessary (to take land out of Flood Zone 2 or 3) and must have appropriate regard to the 2008 Cumulative Land Raising Study for the area.

Any land-raising must not increase flood risk to adjoining areas. Any material imported for land-raising, especially topsoils, must be appropriately similar to the current soil types in the area (which is largely sand-based), to ensure that similar vegetation would thrive. The material must also facilitate high-quality SuDS approaches across the site.

Land-raising proposals should be discussed with adjoining landowners as appropriate, to ensure a broadly consistent approach is taken.

The impact of raised development on the amenity of neighbouring and nearby residential properties (e.g. inappropriate overlooking, surface water and drainage) must be considered and any impacts mitigated through the design and layout of the proposed developments. Raised development bordering the County Wildlife Site must demonstrate the following:

- How the landscaping and changes in gradients are to be appropriately designed to ensure it is 'blended' with neighbouring areas with appropriate transitions between urban and green spaces; and
- Drainage impacts of raised land adjacent to the CWS must not adversely impact the CWS (e.g. by increasing the water table height).

Sustainable drainage systems (SuDS)

A comprehensive approach for SuDS will be necessary, with each individual site needing to demonstrate that it can be drained without surface water flowing onto adjoining land. Paragraph 182 of the National Planning Policy Framework states that where required, SuDS are '*proportionate to the nature and scale of the proposal... providing multifunctional benefits*' and 'have maintenance arrangements in place.'

SuDS structures must be capable of being adopted by an appropriate body (such as Anglian Water), if needed. The inclusion of open space, recreation space, biodiversity and green infrastructure connections should be considered as part of SuDS infrastructure,

with the SuDS 'hierarchy' followed. Some of the desirable SuDS features that could be used include raingardens, tree pits, downpipe planter/attenuation and microbasins rather than a sole reliance on large-scale features. Such features may also contribute to an improved Urban Greening Factor score.

Discharge to Lake Lothing must design for a tide-lock scenario (where discharge cannot take place due to a very high tide). Existing data must be used to design storage for the 1 in 100 +45% critical volume storm with zero discharge for the peak amount of time the outfall would be tide-locked.

A foul drainage strategy, following the requirements in their [adoption manual](#), for each component site, will need to be agreed with Anglian Water.

Glossary

Play on the Way

Play equipment that is delivered on a supplementary basis to a LEAP, NEAP or Youth/Casual that is being delivered elsewhere on-site, and in relatively close proximity. Play on the Way is usually located along routes between key origins and destinations for children (e.g. between home and school) or key community locations (e.g. outside community facilities/local shops, etc.). Play on the Way equipment can be aimed at any age of user, with Play on the Way for young people and adults being typically more fitness focused. Examples include sets of swings, horizontal bars, leapfrog features, boulders/climbable features, stepping stones, permanent hopscotch grid, etc.

Suitable Alternative Natural Greenspace (SANG)

An area of land set up to provide alternative recreational space to reduce pressure on nearby Special Areas of Conservation (SACs) or Special Protection Areas (SPAs), which are the highest.

Wheeling

Wheeling is an alternative to foot/pedestrian-based mobility utilising wheels. This can include wheelchairs, mobility scooters and prams amongst other methods of movement.



Brooke Yachts and Jeld-Wen Mosaic County Wildlife Site

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