

Lowestoft Neighbourhood Plan Consultation Statement

Date

DRAFT

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1. Introduction and Background

- 1.1 The Lowestoft Neighbourhood Development Plan is a community-led framework to shape Lowestoft's development, regeneration and conservation. Extensive community engagement, consultation and communication has been undertaken to achieve a Plan that has the voices of local residents at the heart of it. This Plan has given the community an opportunity to create a 'vision' and planning policies for the future of Lowestoft.
- 1.2 This Consultation Statement accompanies the submission of the Lowestoft Neighbourhood Development Plan (Date). It summarises the community engagement programme and the Regulation 14 consultation. It shows how the requirements of Regulations 14 and 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) have been satisfied.
- 1.3 The Neighbourhood Development Plan Working Group have endeavoured to ensure that the Plan reflects the ideas and vision of the local community and key stakeholders, both of which have been engaged with since the beginning of this process.
- 1.4 Part 5, Section 15(2) of the Regulations sets out that a Consultation Statement should:
- a) contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
 - b) explain how they were consulted;
 - c) summarise the main issues and concerns raised by the persons consulted; and
 - d) describe how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.
- 1.5 Community consultation has been a key priority for the Neighbourhood Development Plan Working Group. Lowestoft is a large, coastal town with <49,000 residents so varied consultation methods were used throughout the consultation to engage with a wide number of the residents.
- 1.6 With the onset of the COVID-19 pandemic in 2020, in-person engagement events needed to be paused with a greater emphasis on online communications and with residents, businesses and landowners.

Designation of the Lowestoft Neighbourhood Development Area

2. Initial Consultation (2018)

- 2.1 Lowestoft Town Council was formed in 2017. Shortly after its formation, the Town Council published a Community Survey to gauge the views of the residents of Lowestoft on what the Town Council's priorities should be.
- 2.2 The survey was published in the Lowestoft Journal (a weekly, local newspaper with circulation of 7,500) in August 2018 with readers encouraged to fill in and return their answers. A stand at the Lowestoft Summer Festival was also arranged for attendees of the event to engage with the survey with hard copies handed out.
- 2.3 Amongst more specific questions, this survey included questions on:
 - What is good about Lowestoft?
 - What is bad about Lowestoft?
 - What could be better?
- 2.4 Responders to the survey were encouraged to select the options that most represented their views on Lowestoft.
- 2.5 Answers from this survey began the process of drafting the policy headings for the Lowestoft Neighbourhood Development Plan. The responses are summarised below.

Survey Questions

- 2.6 The survey asked three questions. Responders to the survey were asked to select the options which best represented their own views.
- 2.7 The first two questions were mirrors of each other. The first question was "What is good about Lowestoft?" with the second question being "What is bad about Lowestoft?". These two questions gave the responders the same options. These were:
 - Access to healthcare;
 - Beaches;
 - Cost of housing;
 - Crime rates;
 - Culture and the Arts;
 - Education and Training;
 - Employment opportunities;
 - Heritage;
 - Most Easterly Point;
 - Parks and Open Spaces;
 - Public Transport;
 - Sense of Community;
 - Shops; and
 - Traffic flow
- 2.8 In total, the question "What is good about Lowestoft?" had 343 responders answer whilst "What is bad about Lowestoft?" had 345 responders. A graph and table showing the results for these questions can be found in Appendix 1.

- 2.9 The Community Survey Summary Report which was published by Lowestoft Town Council after the consultation wrote:
- “The big plusses (liked by over 50% of respondents) were the beaches, heritage, the most-easterly point, the parks and public transport. We were pleased to see how positive people were about a range of Lowestoft assets and we will contribute where we can to increasing the pride in Lowestoft. We will consider these views as part of the development of our neighbourhood plan.”*
- 2.10 The survey responses also show that the majority of votes (over 50%) saw crime rates, employment and opportunities, shops and traffic flow as the four big negatives of Lowestoft.
- 2.11 The final question in the survey asked “What could be better?” and asked residents to vote for the answers that they felt best represented their views. The answer choices they had were:
- Culture, leisure and events
 - Educational opportunities
 - Employment opportunities
 - The environment
 - Housing mix
 - Litter, fly-tipping and waste disposal
 - Planning and development
 - Public transport
 - Range of shops and restaurants
 - Transport planning
 - Use of waterfront (coast and harbour)
- 2.12 This question received 350 responses which are collated in a table and graph in Appendix 1c.
- 2.13 The responses to this question show a large number of people saying that the top three options (all over 70%) for making Lowestoft better are employment opportunities, litter, fly-tipping and waste disposal and use of the waterfront.
- 2.14 Alongside the responses to the survey, some additional comments were also submitted. In total, 49 comments were submitted which added greater detail to the answers. These comments have been collated as part of Appendix 1.

Outcomes from the initial consultation

- 2.15 These responses to the initial survey, including the comments, helped to inform the draft policy themes and to create the nine aims for the Neighbourhood Development Plan. These aims are:
- To enhance the town centre as a distinctive destination for shoppers and visitors
 - To create a 21st-century, mixed-use waterfront
 - To promote investor and business confidence in Lowestoft
 - To achieve a sustainable economy and promote enterprise and innovation
 - To create sustainable communities, supported by a range of community facilities and housing to meet local need

- To create a high quality and sustainable environment
- To deliver heritage-led economic development
- To achieve a balanced and sustainable transport provision
- To protect and enhance green spaces, green infrastructure and parks

3. Further Engagement and Consultation (2018-2022)

3.1 As work on the Neighbourhood Plan progressed, engagement with the wider public and local organisations remained at the heart of its creation. Engagement took place in different forms, with some “ongoing” engagement alongside direct engagement.

Ongoing Engagement Activities

3.2 Throughout the process of creating the Neighbourhood Plan, a series of ongoing engagement took place. This engagement sought to:

- Keep the residents of Lowestoft up-to-date with the progress of the Neighbourhood Plan
- Encourage conversation around and submissions for the Neighbourhood Plan.

3.3 Encouraging further submissions for the Neighbourhood Plan was an important factor, especially as a large part of the plan focuses on the protection and enhancement of important green spaces. Residents were encouraged throughout the process to submit suggestions on the local green spaces they wanted to have protected and any comments to help create a strong evidence base for individual green spaces.

3.4 Examples of ongoing engagement include:

- Dedicated webpage on the Lowestoft Town Council website
- Weekly column in the Lowestoft Journal (a local newspaper with circulation of approximately 7,500)
- Posts on Lowestoft Town Council social media accounts on Neighbourhood Development Plan Working Group activities

3.5 The response for the ongoing engagement was positive with a number of suggestions and comments helping to further develop the Neighbourhood Development Plan. Many key issues were raised throughout the ongoing engagement.

Engagement Activities

3.6 Alongside the ongoing engagement, a series of engagement events also took place during 2018-2022. These used a variety of methods including direct communication with local businesses and organisations, attendance at local events (including Heritage Open Days and the Lowestoft Summer Festival) and online surveys.

3.7 A full list of the engagement and publicity activities and the response to these can be found in Appendix 2.

3.8 Major public consultations focused on the submission of proposals and comments on local green spaces that could be protected through the Neighbourhood Plan. In January 2019, Lowestoft Town Council published an online survey on Open Spaces where local green spaces could be proposed. These were then added to the appropriate policies with further evidence supplied in *Supporting Document 3 – Protecting Open Spaces, Sports Fields and Local Green Spaces*.

3.9 Following the initial engagement, a targeted consultation to gather evidence about the inner harbour took place in July 2019. A list of the people who attended and the results of that consultation can be found in Appendix 3.

3.10 A further stakeholder consultation took place in July/August 2022 specifically on Local Green Spaces. The consultation asked residents of Lowestoft to comment on *Supporting Document 3 – Protecting Open Spaces, Sports Fields and Local Green Spaces*. This consultation also included direct communication land owners, land users (sports clubs etc.) and the County and District Councils. The timings for this consultation matched with the national ‘#LoveParks’ campaign which Lowestoft Town Council used as a platform to run an awareness campaign of the Local Green Spaces consultation. This received a positive response with many of the comments received on social media being used to help add detail to the supporting document. A full summary of the comments received, and the response and action taken can be found in Appendix 4.

4. Informal Consultation ahead of Pre-Submission Consultation

4.1 Ahead of the Pre-Submission Consultation and as part of the stakeholder consultation on *Supporting Document 3 – Protecting Open Spaces, Sports Fields and Local Green Spaces*, Lowestoft Town Council asked both East Suffolk Council and Suffolk County Council for informal comments on the draft Lowestoft Neighbourhood Development Plan.

4.2 Both East Suffolk Council and Suffolk County Council gave feedback on the draft plan. Copies of their letters can be viewed in Appendix 5. Many of the recommendations from these informal comments were accepted. The main changes included:

- Correction of all typos and incorrect figure references,
- Recoding of policies to the LOW1, LOW2 format to improve cohesion,
- Addition of full *Policy Map* and adding labels to maps to improve legibility,
- Rephrasing of aspects of the Plan to make it sound more positive,
- Change of wording within many of the policies to remove “*must comply*” and replace with “*should comply*”,
- Addition of a *Glossary of Terms* at the end of the Plan,
- Additional references to existing plans and updating of references where plans have been adopted rather than being in draft format,
- Detail added to the Town Hall Regeneration supporting text to reflect the plans in progress as part of the Lowestoft Town Council initiative to bring the Town Hall back into use,
- Removal of *Seafront Ness Point Policy* (formally SW2) as this was viewed to not add anything to the existing policy in the Waveney Local Plan,
- Inclusion of Shopping Centre section in *Lowestoft Town Centre and Historic High Street Policy* to help differentiate how the policy should be interpreted for the different areas it covers,
- Removal of *Enterprise, Employment and Tourism Policy* (formally ETC3) as this was reviewed and considered not to add any value to the Plan,
- Removal of *Flood Policy* (formally FSW6) as this was deemed to not add significant detail to local flood policy,

- 4.3 It was also agreed following this informal consultation that the Lowestoft Neighbourhood Development Plan no longer needed a supporting document covering proposed development sites as the revised Plan made no recommendations for individual sites to be developed outside of existing developments proposed in the Waveney Local Plan and site-specific development plans.

5. First Pre-Submission Consultation (Regulation 14) – January 2023

How The Consultation Was Undertaken

- 5.1 Lowestoft Town Council approved the final draft of the Lowestoft Neighbourhood Development Plan on 20th December 2022 ahead of the Pre-Submission Consultation.
- 5.2 The Pre-Submission Consultation (Regulation 14) ran from 24th January 2023 to 7th March 2023 for a six-week period.
- 5.3 Residents, organisations and groups were invited to read the plan and submit comments using a submission form. This form was very open and ask for general comments on the Plan as well as asking people to write what policies or page numbers they wanted to comment on. Residents were also invited to contact the Town Council if they wished for a hard copy of the plan to be sent to them.
- 5.4 A digital version of the Plan was available to download from the Lowestoft Town Council website alongside the comment submission form. Links to these were posted on Lowestoft Town Council’s social media pages (Facebook and Instagram) whilst the local press also ran a launch article in their weekly publication. At the monthly Market in Lowestoft on Saturday 11th February which is organised by Lowestoft Town Council, a leaflet was handed out to people who attended and who passed by to promote the consultation.
- 5.5 Emails were sent to 123 businesses, community groups and interest groups to ask for comments on the Plan. Those asked included statutory consultees (Natural England, Highways England, Public Health Suffolk etc.), local schools, and neighbouring parishes. A list of who was consulted can be seen in Appendix 6.
- 5.6 Through contacting Lowestoft Vision (the local Business Improvement District), the Plan was included in their weekly e-newsletter that is sent to all their partners in the area throughout the consultation.
- 5.7 Hard copies of the Plan were also sent to East Suffolk Council and Suffolk County Council to invite them to comment.
- 5.8 Two Consultation ‘drop-in’ sessions were also arranged. These took place at Hamilton House on Tuesday 7th February (late-afternoon/evening) and Tuesday 21st February (morning) allowing residents to view a display on the Plan’s policies, read a hard copy of the Plan, submit comments and ask questions. These were arranged for different times of the day to make them accessible to a wide range of people. In total, these drop-in sessions had eight attendees.
- 5.9 At the Meeting of the Annual Assembly for Lowestoft on 2nd March 2023, a presentation on the Neighbourhood Plan was given as part of the meeting which also invited those who attended to read the Plan, view the display and make comments. 19 people were present at the meeting.
- 5.10 After the Annual Assembly, the display was taken to Lowestoft Library until the end of the consultation. The display included copies of the submission form and a submission box for

comments. During the period that the display was at the Library, nine submissions were made.

Statutory Consultees

5.11 In accordance with the requirements of the Neighbourhood Planning Regulations, relevant statutory consultees were notified by email, with a link to the final draft of the Lowestoft Plan. In addition, five neighbouring Parish Councils were also consulted alongside schools, community organisations and landowners. All parties were advised that hard copies of the Plan could be issued upon request.

5.12 The full list of consultees that were contacted can be found in Appendix 5.

Responses

5.13 In total, the consultation period received 27 responses, with nine coming from statutory consultees. This resulted in 224 comments to consider which covered a wide range of topics.

5.14 The full list of responses, including the relevant comments and actions taken, can be found in Appendix 7.

5.15 Many of the comments submitted were positive and supported the approach that the Neighbourhood Development Plan was taking. A high percentage of comments also offered advice or suggestions on how policies could be re-worded or additional supporting documents that could be considered as part of the Plan.

5.16 A key concern raised was the imbalance between the policies for North Lowestoft and South Lowestoft with the main shopping centre in North Lowestoft and the North Lowestoft Conservation Area receiving their own policies whilst the equivalent areas in South Lowestoft had no policies. It was agreed that this imbalance should be addressed with new policies for the Kirkley District Shopping Centre (included in the updated Plan as policy LOW4) and the South Lowestoft Conservation Area (included in the updated Plan as policy LOW14) added.

5.17 In addition to this change, it was also suggested that an Infrastructure policy (included in the updated Plan as Policy LOW11) should be added. A Community Aspiration was also added.

5.18 Another issue that arose was that the Chapter on 'Flooding and Coastal Erosion' no longer had a policy assigned to it. The decision was taken that, as the Neighbourhood Plan would not add anything to pre-existing plans on this topic, that the chapter should be completely removed rather than the lack of policy justified.

5.19 Other key changes included:

- Correction of typos and creating consistency in policy names across the Plan,
- Further colour coded key added to the main policy map,
- Additional information added in supporting text across the plan,
- Amendments to various policies to make the wording clearer,

- Adjusting of policy numbering to include the three new policies under the appropriate headings,
- Removing LGS15 from LOW14 (now known as policy LOW17),
- Remapping LGS16 to remove the pumping station,
- Removed RSS7 (Dip Farm Golf Course) from policy LOW15 (now known as policy LOW18).

5.20 Many of the recommendations submitted were accepted. Where no action was required, the main reason was because the suggestion fell outside of the scope of the Neighbourhood Plan. Any comments that did not impact on the Neighbourhood Plan but may be relevant to other authorities or landowners were passed on to the relevant authority or business.

5.21 Following this Regulation 14 Consultation, the changes made from the responses, and advice given by East Suffolk Council, it was agreed that a second round of consultation on the Plan would be beneficial given the new policies that were added. It was agreed that this would address the key concern raised from this first Pre-Submission Consultation.

6. Second Pre-Submission Consultation (Regulation 14) – October 2023

How The Consultation Was Undertaken

6.1 Lowestoft Town Council approved for a second round of the Pre-Submission Consultation on 26th September 2023.

6.2 The Second Pre-Submission Consultation (Regulation 14) ran from 30th October 2023 to 11th December 2023 for a six-week period.

6.3 With two of the three new policies covering the South Lowestoft area, it was agreed that the consultation should focus on engagement in the South Lowestoft/Kirkley area. This involved targeted engagement with residents, businesses, community groups and organisations within the South Lowestoft area, especially those located on or near London Road South. These were invited to read the plan and submit comments using a submission form. As with before, this form was very open and asked for general comments on the Plan as well as asking people to write what policies or page numbers they wanted to comment on. Residents were also invited to contact the Town Council if they wished for a hard copy of the plan to be sent to them.

6.4 A digital version of the Plan was available to download from the Lowestoft Town Council website alongside the comment submission form. Links to these were posted on Lowestoft Town Council's social media pages (Facebook and Instagram) whilst the local press also ran a launch article in their weekly publication. The consultation was also featured in the Lowestoft Vision BID weekly newsletter to all partners.

6.5 Alongside the draft Plan, a separate document listing the full details of what had been changed in the Plan since the previous round of engagement was also published. This compared the wording in the two versions of the Plan. A copy of this document can be found in Appendix 8.

- 6.6 For this second round, over 125 businesses, community groups and interest groups were asked for comments on the Plan. Those asked included statutory consultees (Natural England, Highways England, Public Health Suffolk etc.), local schools, and neighbouring parishes. A list of who was consulted can be seen in Appendix 6.
- 6.7 A public drop-in session was also organised for Wednesday 22nd November, 3pm-6pm at The Kirkley Centre in South Lowestoft. This location was chosen as it is located in the heart of the two new policy areas affecting South Lowestoft with the time chosen to enable local businesses owners to attend at the end of the working day. In total, fifteen people attended this drop-in.
- 6.8 Following the drop-in session at The Kirkley Centre, a display about the Plan and a comments box was left for the users and visitors of the Centre to look at and comment on. This display coincided with the South Lowestoft Christmas event on the weekend 25th-26th November which had a high footfall of visitors come to events in and around The Kirkley Centre.

Statutory Consultees

- 6.9 In accordance with the requirements of the Neighbourhood Planning Regulations, relevant statutory consultees were notified by email, with a link to the final draft of the Lowestoft Plan. In addition, five neighbouring Parish Councils were also consulted alongside schools, community organisations and landowners. All parties were advised that hard copies of the Plan could be issued upon request.
- 6.10 The full list of consultees that were contacted can be found in Appendix 6.

Responses

- 6.11 In total, the consultation period received 27 responses, with nine coming from statutory consultees. This resulted in 128 comments to consider which covered a wide range of topics.
- 6.12 The full list of responses, including the relevant comments and actions taken, can be found in Appendix 9.
- 6.13 Many of the comments submitted were positive and supported the approach that the Neighbourhood Development Plan was taking. It was encouraging to see support for the new policies with the lack of balance across of Lowestoft seemingly addressed. Some of the submitted comments fell outside of the scope for a Neighbourhood Plan or promoted policy changes that were contrary to national planning policy.
- 6.14 Following the removal of the Flooding and Coastal Erosion chapter after the first Pre-Submission Consultation, it was decided that a new paragraph to note the flooding and coastal erosion that Lowestoft experiences within the opening context section of the Plan.
- 6.15 Two new supporting documents to add context to some of the Plan's policies were also suggested. These included a supporting document on Wildlife and Ecological Corridors and a separate document on Non-designated Heritage Assets.

6.16 It was also agreed that the section highlighting the “Other Evidence” documents (para 3.10) should be expanded to give a brief summary of each document and a link to the full document.

6.17 Other changes to the Plan included:

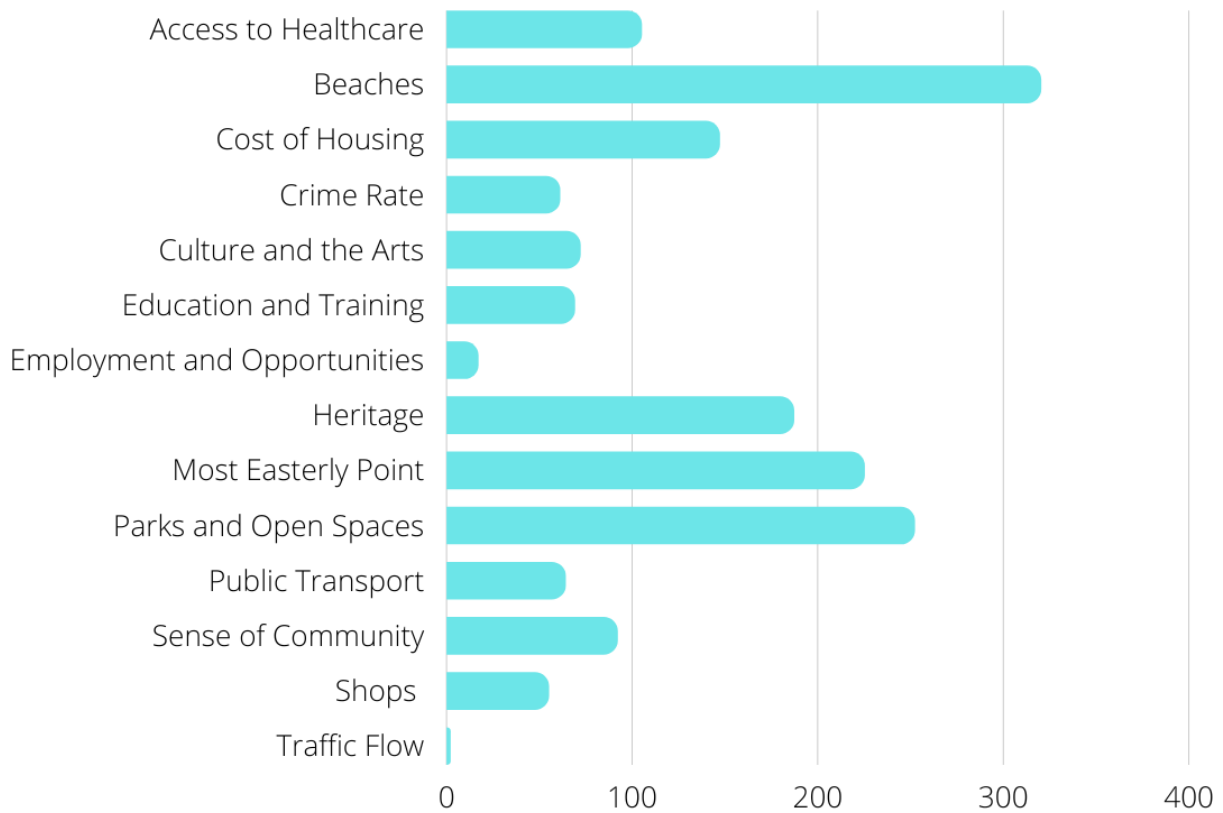
- Minor amendments to supporting text,
- Additional evidence documents added for reference,
- Policy Map key added alongside tidying up of maps to make them clearer,
- Minor amendments to policies (as suggested through consultation comments)

Appendix 1: Initial Consultation Survey Results

2a) Question: What is good about Lowestoft?

Answer	Responses (%)	Responses
Access to Healthcare	30.61%	105
Beaches	93.29%	320
Cost of housing	42.86%	147
Crime rates	17.78%	61
Culture and the Arts	20.99%	72
Education and Training	20.12%	69
Employment opportunities	4.96%	17
Heritage	54.52%	187
Most Easterly Point	65.60%	225
Parks and Open Spaces	73.47%	252
Public Transport	18.66%	64
Sense of Community	26.82%	92
Shops	16.03%	55
Traffic Flow	0.58%	2

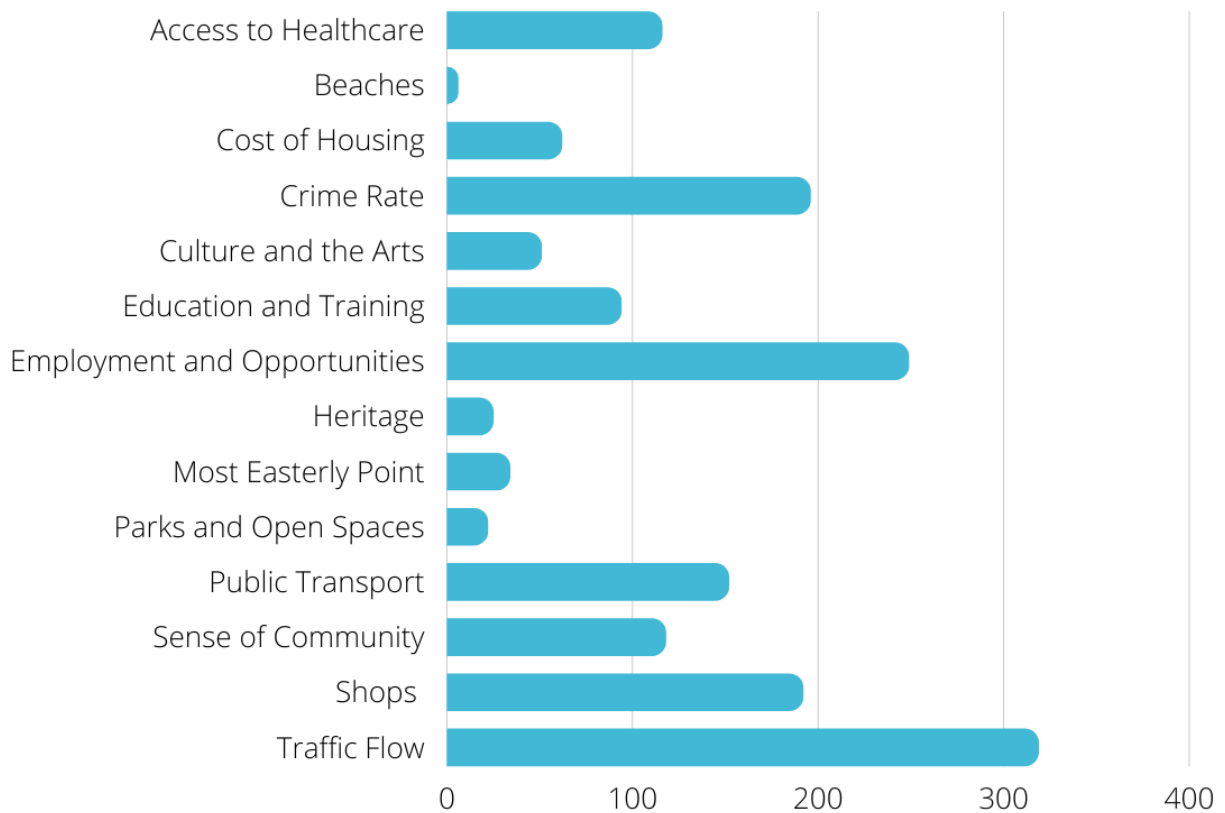
What is Good about Lowestoft?



2b) Question: What is bad about Lowestoft?

Answer	Responses (%)	Responses
Access to Healthcare	33.62%	116
Beaches	1.74%	6
Cost of housing	17.97%	62
Crime rates	56.81%	196
Culture and the Arts	14.78%	51
Education and Training	27.25%	94
Employment opportunities	72.17%	249
Heritage	7.25%	25
Most Easterly Point	9.86%	34
Parks and Open Spaces	6.38%	22
Public Transport	44.06%	152
Sense of Community	34.20%	118
Shops	55.65%	192
Traffic Flow	92.46%	319

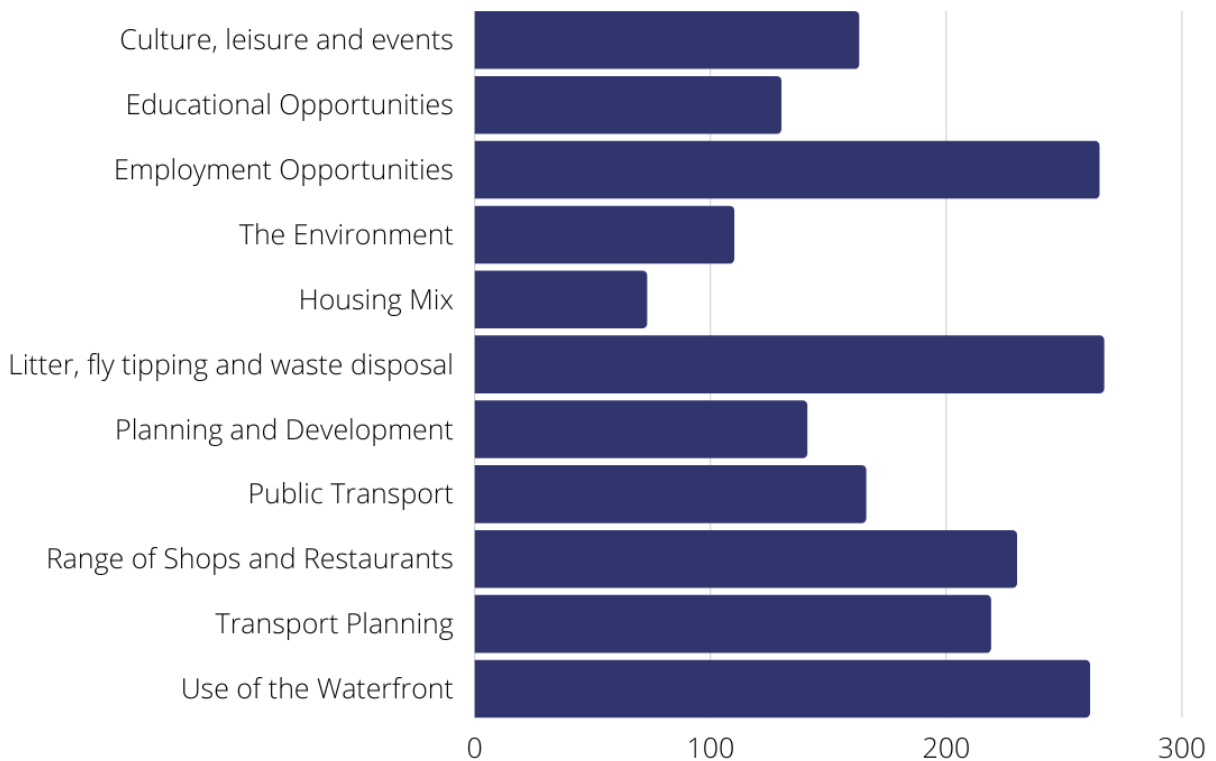
What is Bad about Lowestoft?



2c) Question: What could be better?

Answer	Responses (%)	Responses
Culture, leisure and events	46.57%	163
Educational opportunities	37.14%	130
Employment opportunities	75.71%	265
The environment	31.43%	110
Housing mix	20.86%	73
Litter, fly-tipping and waste disposal	76.29%	267
Planning and development	40.29%	141
Public transport	47.43%	166
Range of shops and restaurants	65.71%	230
Transport planning	62.57%	219
Use of the waterfront (coast and harbour)	74.57%	261

What could be better?



2d) Comments submitted alongside the questions

Subject	Comment
Access to Healthcare	<i>No additional comments submitted</i>
Beaches	<ul style="list-style-type: none"> • Not blue flag • North Beach needs facilities • Wonderful – though more attention to Pakefield cliff cutting would be appreciated
Cost of housing/Housing Mix	<ul style="list-style-type: none"> • Could be more quality, less Persimmon • Landlords are buying up property and don't care who is in it • Lowestoft offers affordable housing in line with the rest of the country
Crime rates	<i>No additional comments submitted</i>
Culture and the Arts	<ul style="list-style-type: none"> • Good – especially the Royal Philharmonic Orchestra at the Marina Theatre
Education and Training	<i>No additional comments submitted</i>
Employment opportunities	<i>No additional comments submitted</i>
Heritage	<ul style="list-style-type: none"> • The sad, shabby old Town Hall has taken the heart out of North Lowestoft! Pity Gt Yarmouth's example wasn't followed – refurbishment £3million and preservation of a grand old building
Most Easterly Point	<ul style="list-style-type: none"> • Dreadful dump • Could be made more attractive around it • A 'sad spot' in an industrial area providing much needed employment, so difficult to resolve
Parks and Open Spaces	<ul style="list-style-type: none"> • Not maintained as before • Make better use of the parks for events • Good – mainly through magnificent work by volunteers
Public Transport/Transport Planning	<ul style="list-style-type: none"> • Bring back the yellow buses. If I go to the Marina there are no buses at all and have to get a taxi. Would visit more shows • Abysmal • Very bad • Bad, especially in Oulton Broad • Trains are good, buses bad • Faster trains and more frequent trains to London Liverpool Street, Ipswich and Norwich • Improve 100% • Bad due to the bridge
Sense of Community	<i>No additional comments submitted</i>
Shops/Range of Shops and Resaurants	<ul style="list-style-type: none"> • Sad so many closed – bring down business rates and parking charges • More restaurants Pakefield end and amusements for small children along the front like Felixstowe
Traffic Flow	<ul style="list-style-type: none"> • It doesn't! • Terrible • Close Oulton Broad bridge at certain off-peak times only. This causes a major obstacle (and cost). Traffic queues are intolerable • Cars parking on grass verges and pavements • Very bad at bus station • Cheaper car parking

	<ul style="list-style-type: none"> • Too many traffic lights • Parking is also bad • Not always the bridge to blame • Traffic never flows in this town. Either Oulton Broad or Waveney Drive. You always queue. Total waste of money spent on road system • Stop cycling in town centre (between McDonalds and Tennyson Road). Too many speeding cyclists – had near misses! • Dreadful – especially Clapham Road/Denmark Road. Motorists ignore yellow boxes • Car parking in stupid ways
The Environment	<ul style="list-style-type: none"> • The drain in the shopping area often smells and has done for years – puts people off shopping • Please please do something! Unable to shop in town centre as seagull mess everywhere! Pavements are white with it. I now avoid the town centre and gulls • Please note pollution of pavements especially to town centre • The brickwork of the Crown Hotel destabilising, also buddleia growing from corner brickwork part way up • Do something about the smell of sewage in the town centre • Dogs on beach – bad • Dog poo everywhere on pavements – bad • Filthy bus station • Filthy town centre streets – bad image for visitors/tourists and locals when it's not beach weather
Litter, Fly-tipping and Waste Disposal	<ul style="list-style-type: none"> • Educate people not to throw litter • Most important. Stop charging at the recycle centre/tip. Too much fly tipping • Glass could be disposed of with recycling collections • More litter bins required • Home owners should clean up at the back of their properties
Planning and Development	<ul style="list-style-type: none"> • Get rid of eyesores • On approach to Lowestoft from Ipswich everything looks fine. It is the town centre and High Street where things go badly wrong. It mostly looks rundown and in dire need of re-development. Even the bus station is a mess – move it. • Eyesore of what remains of the car park above Wilko's – is it finished?! • Toilets bad. Near Claremont Pier very dirty, need updating. Toilets near East Point Pavilion have no water to wash your hands or dryers working • Toilets could be better • Lack of toilet facilities on the promenade • Pavements on Higher Drive and Orford Drive are not good for mobility scooters • Make sure the drains and gutters are clear of leaves and rubbish so as to help stop flooding! • Get people to cut their hedges • Council and home owners who allow hedges to grow over the pavements

	<ul style="list-style-type: none"> • Toilets disgusting. Broken doors for months at Bus Station • Toilets near Wilko so narrow if you have shopping etc, with the toilet roll on wall, no room. I was in town waiting for bus at 09:30 and toilets were shut. I counted at least 25+ people trying to get in
Use of the Waterfront (Coast and Harbour)	<ul style="list-style-type: none"> • 10000% needs to be improved • Improve access, not made the most of • Look at Ipswich waterfront. Lowestoft looks derelict • Loss of too many businesses • Bring back our fishing from E.U • Also the town centre

Appendix 2: Publicity and Engagement Activities 2018-2023

	Publicity and Engagement	Key issues raised or feedback received
Ongoing	Dedicated webpage on the Lowestoft Town Council website	
Ongoing	Weekly column in the Lowestoft Journal (a local newspaper with circulation of approximately 7,500)	<ul style="list-style-type: none"> • Green spaces • Tourist economy • High Street • Generic questions regarding what the Neighbourhood Development Plan can do for the town
Ongoing	Posts on Lowestoft Town Council social media accounts on Neighbourhood Development Plan Working Group activities	<ul style="list-style-type: none"> • Environmentally friendly posts have received most comments. A photo shared of all members of Neighbourhood Development Plan working group leaving the office on their bicycles was well received
Ongoing	Engagement with “Friends of” and advocacy groups throughout the town regarding the use of parks and open spaces	<ul style="list-style-type: none"> • Initiatives to protect and improve parks and open spaces
Ongoing	Formal engagement with Historic England regarding the protection and redevelopment of the Town Hall (grade II listed) and work with the Heritage Action Zone (HAZ) stakeholders. This has included engagement with members of the public at HAZ events.	<ul style="list-style-type: none"> • Protection and appropriate development within the (North Lowestoft) Heritage Action Zone
Ongoing	Engagement with Highways Authority and Highways England on transport and infrastructure engagement	<ul style="list-style-type: none"> • Flood defences • Third River Crossing and related infrastructure and roadworks planning
Ongoing	Engagement with the business community, including Associated British Ports, Scottish Power and Birds Eye.	<ul style="list-style-type: none"> • Regeneration of the high street retail areas • Use of the ‘water side’ land and development of port activity.
Ongoing	Engagement with Coastal Fisheries initiative regarding harbour redevelopment	<ul style="list-style-type: none"> • Growth in offshore energy industry • Redevelopment and funding generation for the future of the high street
Ongoing	Engagement with the Lowestoft Place Board (on which Lowestoft Town Council is a stakeholder) and the Lowestoft Ambassadors	<ul style="list-style-type: none"> • Policies to support quick and long term ‘fixes’ for improved footfall in town • Regeneration of the East Anglian fishing industry
Ongoing	Engagement with history and heritage groups	<ul style="list-style-type: none"> • Protection of the historic environment • Historic High Street and buildings within, unique ‘scores’ heritage aspects of parks and open spaces • History of the fishing village
August 2018	Community Survey to residents. One Tabloid page with questions on what is good, what is bad, would you change. Results began the policy heading drafting.	<i>See Appendix 1</i>

August 2018	Lowestoft Summer Festival – stand with copies of the above Community Survey	<i>See Appendix 1</i>
September 2018 & September 2019 and ongoing	Heritage Open Days	<ul style="list-style-type: none"> • Protection of the historic environment • Historic High Street and buildings within, unique ‘scores’ heritage aspects of parks and open spaces • History of the fishing village
January 2019	Survey Monkey on Open Spaces. Also engagement with Suffolk Wildlife Trust and commissioning of biodiversity surveys. Have an extensive list of respondents who put forward their requests for LGS designations including rambles association, bird watching groups, dog walking groups.	<ul style="list-style-type: none"> • Dip Farm site registered as an asset of community value. • List of sites for designation
February 2019	Tourist Board meetings. Engagement with Lowestoft Cultural Board and cultural initiatives such as First Light Festival, Making Waves Arts Project. Engagement on public art for new Ness Park.	<ul style="list-style-type: none"> • Opportunities for all to engage in the arts and development of the arts.
March 2019 & March 2020	Annual Town Meeting. Stand and displays with opportunity to suggest areas for LGCS	<ul style="list-style-type: none"> • Local Green Spaces designations. • Protection of open space and places for recreation. • Cycle paths and movement around town. • The future of the high street - shop closures, out of town shopping detrimental to high street.
June 2019 and ongoing	NSPCC open event presentation. Waveney Youth Council.	<ul style="list-style-type: none"> • High Street - nothing to do! • Public Transport to access other towns and cities.
June – December 2019	Sustrans Cycle Way Consultation, Community Rail Development Officer, East Suffolk Travel Association meetings, liaison with County Council cabinet member for Transport.	<ul style="list-style-type: none"> • Cycle Parking. • Lack of bus stops and bus routes not accessing key areas of town.
July 2019	Town Council declares climate emergency. Lowestoft Climate Action Group formed. NDP Committee presentations to Action Group. Development of policies and initiatives to support ‘green’ initiatives. Engagement on standards for new buildings.	<ul style="list-style-type: none"> • Standards for sustainable development. • Electric charging for cars. • Cycle paths. • Insulation in properties. • Tree Planting and conservation of open spaces.
November 2019 and ongoing	Work with District Council in socially deprived area to engage with youth and improve facilities for them. Surveys and engagement events carried out	<ul style="list-style-type: none"> • Amenities required. • Social and Sporting activities needed.
March 2020	Engagement with landowners of sites designated for development in Waveney Local Plan	<ul style="list-style-type: none"> • Protection of heritage assets in development. • Securing green space within development. • Residential and Retail Mix.

July/August 2022	Consultation on proposals for protection of green spaces and playing fields	<i>See Appendix 4</i>
July/August 2022	Informal consultation with County and District Councils on the draft Plan and supporting documents	<i>See Appendix 6</i>
January-March 2023	Regulation 14 Consultation – Pre-submission draft consultation with the public and statutory consultees. Consultation period included two “drop-in” sessions, leaflet hand out at monthly Triangle Market event in February, radio interviews and public display in Lowestoft Library	<i>See Appendix 6 and 7</i>
March 2023	Annual Assembly presentation to give an update on the LNDP and give further opportunities for responses to the Regulation 14 pre-submission consultation.	<ul style="list-style-type: none"> • Importance of local green spaces raised • Climate Emergency • Protection of wildlife • General queries on how the LNDP works alongside the Waveney Local Plan and other planning documents
October – December 2023	A second Regulation 14 Consultation – Pre-submission draft consultation with the public and statutory consultees. Consultation period included a “drop-in” session in South Lowestoft alongside a public display at the Kirkley Centre.	<i>See Appendix 8 and 9</i>

Appendix 3: Inner Harbour Targeted Consultation

Date	Contact	Company	Business
2019-06-26	John Wylson - Chairman	Lowestoft Harbour Maritime Business Group	Also vice-president of the Excelsior Trust (preserved sailing vessel)
2019-07-16	Simon Brown – General Manager	Caudwell Marine	Diesel engine outboard propulsion units
2019-07-16	Graham Barber - Owner	Sunny Camper Restoration Ltd	VW camper van restoration (ABP tenant)
2019-07-19	Carl Honeywood – Managing Director	Alpine Fabrication Services Ltd (AFS)	Steelwork fabricators; marine repairs
2019-07-23	Derek Saunders – Silo Manager	Dudman (Lowestoft) Ltd	Grain silo – export wheat & barley shipments
2019-07-23	Paul Willis – Operations Director	Boston Putford Offshore Safety Ltd	Shipowners – offshore standby/supply vessels
2019-07-24	Jim Maitland – General Manager	P&O Maritime UK Ltd	Ship management – <i>CEFAS Endeavour</i> research vessel
2019-07-24	Robert Holmes – Estates Manager	Associated British Ports (ABP)	Lowestoft port operator and landowner
2019-07-25	Neil Clarkson – Managing Director	Windcat Workboats Ltd	Offshore wind farm crew transfer boats
2019-07-25	David Saunders - Owner	Wavetrade Ltd	Crane hire
2019-07-25	James Grala-Wojrezyk – Shipyard Manager	Southampton Marine Services (SMS Group)	Shiprepair – Lowestoft dry dock

Observations

The interviews were conducted with either shipping companies whose vessels berth in the harbour, or businesses located adjacent to the port along Commercial Road and North Quay, and most importantly with ABP, the owner and operator. There is an eclectic mix of those intimately dependent upon shipping, such as the long-established dry dock and silo, which cannot be located inland, and new businesses such as the manufacturer of outboard diesels and the operator of wind farm catamarans.

There were some common complaints: -

- The lack of skilled local labour – most qualified tradesmen in the area are now late middle aged, having received traditional craft apprenticeships. The offshore business still relies on a predominantly travelling workforce.
- Low attainment levels of school leavers in Lowestoft. A couple of companies had successfully recruited decent apprentices; another firm had abandoned any training.
- Traffic congestion at the junction of Commercial Road and the A12 at the northern end of the bascule bridge. Residents and shoppers who park blatantly on double yellow lines on both sides of Commercial Road leave insufficient room for mobile cranes and articulated lorries.

The sequence of the traffic lights at the junction leaves insufficient time for lorries to leave Commercial Road.

- High rents charged by ABP as landlord of the port estate.

The shipping companies noted that although there was segregation of recycled material onboard, there are inadequate waste reception facilities along the quays. Also there is no provision for shore power supplies to ships moored alongside.

On the other hand, there was general optimism for the opportunities and relief to be gained from construction of the Gull Wing third crossing, and also the flood defence scheme that will release waterfront sites for realistic inward investment.

Time does not stand still. As the oil and gas business has declined, so support of the offshore wind farms has developed. After a lapse of several years, new fuel tanks provide a bunkering facility. Since Brexit there has been hope that the fishing industry might be revived. However, one respondent stated that 30 years ago it had been difficult to recruit crew for trawlers, so that deep-sea fishing would be unlikely to return to Lowestoft. Traditional skills such as net mending have all but disappeared.

Over the last four decades the size of ships has steadily increased, inversely affecting the market for the ageing dry dock, which cannot be extended. Similarly, the silo used to load and discharge coasters of 800 tonnes, but now handles fewer cargoes, loading ships of up to 4,200 tonnes deadweight. The silo can no longer discharge cargoes, and its capacity is much reduced, though still exporting grain from all over East Anglia.

Following re-signalling and track relaying by Network Rail, the revised layout of the freight yard at Lowestoft Station is an investment for the future, in anticipation of aggregates from offshore dredging being discharged at North Quay into ballast trains destined for construction sites inland such as HS2 and Sizewell 'C'. Network Rail also plans refurbishment of the three, ancient swing bridges at Oulton Broad, Somerleyton and Reedham in order to extend their life by 25 years, though it has not been clarified if weight or speed restrictions will be eased.

ABP has drafted a Masterplan for consultation, to which Lowestoft Town Council responded. The final version is due for publication imminently. ABP has invested over £3m over the last three years – demolition of the redundant Shell base to release 13 acres of waterfront land; new warehousing and security, quay fendering, fibre-optic internet, and a new pilot boat. In addition, Scottish Power Renewables has ploughed £10m into its operations and maintenance base in Hamilton Dock.

Perhaps the nadir of the port of Lowestoft has passed. With improved transport links, the future may indeed be brighter.

Appendix 4: Local Green Spaces Stakeholder Consultation

Comment	Response	Action
General Comments:		
It's a great idea! Lots of luck on it. Those areas sound great. I don't know much of Lowestoft but sounds good.	Support Welcomed	No action taken
I think a focus on preserving (and creating) high quality green spaces is a really important and worthwhile NP objective	Support Welcomed	No action taken
On the Contents Page, page 8 is listed as "Local Green Spaces identified in Lowestoft Neighbourhood Plan". Figure 1 caption below the image on page 8 states "Map of Local Open Spaces identified in Waveney Local Plan". The title above the image on page 8 reads "Local Green Spaces identified in the Waveney Local Plan". It is recommended to have consistency with these titles and captions.	Agreed – changes to be made	Changes to the constituency to titles and captions made across the supporting document
Reference is made to the NPPF, and in particular the criteria for LGS set out in paragraph 102, which is supported. It is suggested that the criteria displayed on page 7 indicates that this is paragraph 102 of the NPP	Agreed – add para 102	Paragraph 102 added
Strategic Green Space		
What do you define as "extensive"? The first sentence of Section B Strategic Green Space (page 10) states "...northern coastline of Lowestoft that is too extensive to be classified as a Local Green Space". What was the criteria for designation as a 'Strategic Green Space'? This should be clarified.	Extensive cannot be definitively clarified it's a matter of judgement. The NPPF simply refers to 'should not be an extensive tract of land' with no further definition.	No action taken
General Comments on Local Green Spaces		
From the descriptions provided in the tables for each site in Section C Local Green Spaces, we cannot see any concerns with the proposed LGS sites, and each appear to meet the criteria set out in the NPPF. We welcome that the tables include the details of what makes each of the sites significant, including views, ecology, recreation, history, green break etc. If this is your final selection of sites, it is suggested to add at the bottom of each table: "Is site suitable for designation as LGS?" = "Yes. Site is designated as LGS" This would clarify that	Support for sites selected as LGS is welcome. Agreed to add wording to clarify the site is selected as an LGS.	Clarification added

<p>the site was suitable, and would be designated as LGS. Maps of each site indicating location is included, which is welcome.</p> <p>In the 'proximity' section of table, it is suggested to include distances from key locations e.g. "LGS site 1 is [X] meters from [town hall] [train station]" Each of the tables read: "The site is not an extensive tract of land." It is recommended to include site size in each table for clarity, to prove that is it not an extensive tract of land</p>	<p>Distance from key sites is not relevant to selection as a LGS.</p> <p>Site size to be added to the tables.</p>	<p>Sizes are already included in titles of maps.</p>
<p>The following sites do not have photos included with the descriptions, and should be added: • LGS4 Fisheries Meadow • LGS5 Shingle Glade • LGS6 Saints Green • LGS7 Florence Field & Nightingale Road Play Area • LGS8 Pakefield Green • LGS9 Pakefield Park & Love Lane • LGS10 Tom Crisp • LGS11 Rosedale Park • LGS12 Uplands Community Centre • LGS13 Clarkes Lane • LGS15 Kirkley Waterfront • LGS17 Gunton Community Park</p>	<p>Agreed</p>	<p>Additional photographs added</p>
<p>Formal Recreation and Sports Spaces Maps are included for the sports & recreation sites, which is welcome. Sites 2,3,5 include photos in the description of the sites. It is suggested to include photos of all of the sites listed as part of descriptions. It is suggested to add site sizes into text description of each site.</p>	<p>Agreed to add photos and site sizes.</p>	<p>Additional photographs added and site sizes included.</p>
<p>GENERAL OBSERVATIONS. Excellent report as far as it goes, but information may be obsolete in relation to at least two of the specified assets, I believe another asset is poorly/ambiguously defined, some of the Town Council "plans" cited for certain assets are aspirations from the Open Spaces Strategy and are not under active consideration as live projects so these would need to be tabled on relevant agendas if we are to deliver on any such undertakings communicated through the Neighbourhood Plan, and there are one or two conspicuous (and disappointing) omissions.</p>	<p>Support and comments providing detail on proposals (see below) welcomed.</p>	
<p>We would like to comment on the Lowestoft Neighbourhood Plan - Local Green Spaces. We are the community group representing residents and businesses in the North Lowestoft HAZ area. These comments came out of a meeting where we looked at and discussed the document sent to us.</p> <p>1. We do not understand how Green Spaces can be discussed in isolation outside of the neighbourhoods in which they are located. A neighbourhood</p>		<p>Comments to be discussed at next Working Group meeting</p>

<p>needs to be considered in its entirety i.e. how it works for the people living, working and connected to it. If other assets in the neighbourhood are under the direct control of a different council so cannot be considered alongside then this may be problematic as it undermines the integrity of the local area e.g. roads or other access routes, other developments that may encroach on green spaces, inappropriate developments roundabout, etc.</p> <p>2. In our local area - the north Lowestoft HAZ area there are very few 'community' green spaces. Although Arnold's Walk, Sparrows Nest, Belle Vue Park and the Ness but are found in our HAZ area these are not in local areas where people live and spend time (e.g. the High Street and roads adjacent that are very densely populated). We feel we are very short of community green spaces that all in our area can enjoy and are very keen to work with LTC in developing community green spaces that local people feel ownership and responsibility towards. For example - the pocket park in Compass St is much used by local people (and children) but it has no green in it and is a particularly inhospitable and 'hard' area; similarly land next to the Scores and even the Scores themselves are vestiges of a previous era and have now fallen into disrepair through lack of proper use. The Scores could be a resource for tourists and local residents giving meaning and purpose back to them now and in the future.</p>		
<p>Wellington Gardens:</p>		
<p>I wish to write to support Wellington Gardens being part of the lowestoft Green spaces. It's a beautiful space between the historic Samuel Morton Peto terrace and the sea. I live in the terrace and watch people using the garden from the early hours to walk their dogs. In early morning children wandering through, young parents sitting with children and then as the day continues families and retired couples enjoy the tranquility of the park.</p> <p>In summer people leave the beach to enjoy the freshness of lying on the greenery and having a picnic. It's very much part of the local community life. I've known the Gardens for nearly 20 years. Previously there were lovely flowers which are no longer planted. The grasses and small annuals are pleasant, but the previous array of flowers are much missed. It's a shame when</p>	<p>Support welcomed – details to be included in the justification</p>	<p>Details added to Wellington Gardens description</p>

<p>you go to other local seashores, that they have kept the tradition of more flower beds.</p> <p>More recently the upgrade of the pier has improved the look of the edge of the garden. This has had some downside with unsightly bins being stored next to the garden and some unruly behaviour from the pier spilling over to the garden late at night.</p> <p>I hope others have also written to support this great space.</p> <hr/> <p>I am writing in response to the call for responses about local green spaces in Lowestoft. I would like to register my views about the importance of protecting Wellington Gardens as a well-loved and historic green space in Lowestoft.</p> <p>I own a house on Wellington Esplanade, which I let out to holiday makers. My house is an entire house (ie it has not been divided into flats) and so it tends to attract multi-generational families (grandparents with their adult children and their children), or two families holidaying together. For these groups, the beach and the Gardens, giving a beautiful open view to the sea, are a major attraction of coming to Lowestoft. In turn, my guests bring spending power to the local businesses, shops and restaurants around.</p> <p>As you will know, the Gardens have historical significance as they were part of the construction of Wellington Terrace by Sir Samuel Morten Peto in the mid 1800s. The Terrace is now Grade 2 listed and members of the planning department at East Suffolk Council have previously expressed the view to me that it is considered to be one of the most important architectural assets in the town. Jon Sheaff, the architect currently engaged by East Suffolk Council in respect of the Towns Fund regeneration has also emphasised the historical importance and interest of the Gardens, as have members of Historic England when they have visited.</p> <p>In addition to the historical significance, the Gardens are also a well-used green space for local people: there is the weekly park run and yoga classes, as well as dog walkers and members of the public who use the benches and gardens as a place to sit, picnic, catch up with friends and enjoy a few moments rest when walking along the sea front. There is also a local group (of which I am a member) who tend to two community herb beds in the gardens. The herbs that are grown are for the use of anyone who would like to take some. I have had</p>	<p>Support welcomed – details to be included in the justification</p>	<p>Details added to Wellington Gardens description</p>
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<p>many conversations with members of the public passing by who ask about how to cook the artichokes we grow, for example, or saying that they have been using some of our rosemary, or chives, or thyme in their cooking.</p> <p>For all of these reasons, I consider Wellington Gardens to be a very important local green space and one which should be protected and, if at all possible, invested in so that the pathways and planting can be improved to make it an even nicer place to be.</p>		
<p>In response to questions for above green space (<i>Wellington Gardens</i>):</p> <ol style="list-style-type: none"> 1. There are significant views from Wellington Esplanade properties across the gardens. Samuel Morton Peto having designed the gardens to always ensure a sea view for these historic homes. 2. It affords the public with these sea views - a place where they can have a coffee, play and can picnic, walk dogs, join fitness classes or join in council run park run for 500 people or more. It provides a green space with clean fresh sea air and provides mental well being with the seasonal colour planting. 3. The site dates back to the building of the terrace in 1860's and is part of Samuel Morton Petos development of Lowestoft as a Spa town and popular seaside resort. I have postcards of Victorian images of the gardens which would be recognisable now to the Victorian visitor. It is a valuable space adding greatly to the visual architecture of Wellington Esplanade properties which are being listed as integral to the current development of the High Street Heritage Action Zone area programme in conjunction with Historic England and East Coast Suffolk council. 4. The site does have recreational value to numerous health projects including football training, outside gym keep fit classes and the community weekly park fun run for well over 500 people. In addition it is a popular meeting place to share chips and a chat as well as endless dog walkers enjoying the greenery and a safe open space to walk. 	<p>Support welcomed – details to be included in the justification</p>	<p>Details added to Wellington Gardens description</p>

<p>5. & 6. The site is tranquil as it can be a step off the busy promenade of cyclists and walkers to take solace as plenty of seats to enjoy the sun and views. The hedging provides wind shelter, sound barrier from road as well as nesting and screening for sparrows and starlings in particular. There are hedgehogs, foxes and rabbits.</p> <p>Friends if Wellington gardens have provided a community herb and edible plant bed which also brings in butterflies and bees.</p> <p>7. The gardens do provide a space between road and beach - and highlight the beauty of the area - it enhances the seafront and provides a garden in between car parks, play areas, tea rooms and hotels. In fact they should be made more of and the fauna and flora increased to provide more colour and scent and texture and have a sensory garden to bring even more well being and mental health support alongside existing physical sport.</p> <p>The site is very important locally - and it is disappointing when the council gardeners and refuse collectors work so hard to ensure it's maintained for all, that those who frequent the Pier see it is to be used as a public convenience and somewhere to scream and swear and fight late at night disturbing the tranquility we otherwise all enjoy.</p>		
<p>Wellington Gardens is laid out in a formal manner to complement the Grade II listed Victorian terrace of Wellington Esplanade and as such it should remain. It forms part of one of the most iconic sites in the town. There are a couple of large plaques providing historical information about Samuel Morton Peto. It provides a tranquil area in which to sit and is a popular meeting place. It is also used by many dog walkers.</p> <p>It provides the finishing line for the park run on Saturday mornings which brings in several hundred runners every week. It is also used by a women's exercise group on Wednesday mornings.</p> <p>Please let me know if there is anything further I could add. I have not mentioned how the area might be improved or the impact of new developments nearby.</p>	<p>Support welcomed – details to be included in the justification</p>	<p>Details added to Wellington Gardens description</p>

<p>I live opposite the Claremont pier & I am a pensioner. I have no complaints about the night club or the early cleaning. Whoever complained about going's on in Wellington Gardens must have very good eyesight as I'm always looking out my window and at night it is very hard to see what goes on in the gardens . Sadly there are always going to be the few who spoil it for people enjoying themselves. I have lived in Lowestoft all my life & when I was younger there were lots more places to go but now there is hardly any. I was told the people at the Claremont pier were going to do fireworks last summer but couldn't as some people objected at least someone is trying to do something for the people of Lowestoft please don't let the small minority of people spoil for them.</p>	<p>Support welcomed – details to be included in the justification</p>	<p>Details added to Wellington Gardens description</p>
<p>Bond's Meadow, off Sand's Lane</p>	<p>This is in Oulton Broad Parish so falls outside of the Neighbourhood Plan area.</p>	<p>No action required</p>
<p>Strategic Green Space:</p>		
<p>To repeat a previous comment, the consultant's proposal to congregate areas A-K of North Lowestoft and Gunton into a Strategic Green Space is an excellent and pragmatic idea. To be consistent, areas LG4-LG7, which form a linear strip along the clifftops at Pakefield, could also be combined into a single Strategic Green Space.</p>	<p>Support for the strategic green space welcomed. This area is too big to be classified as a Local Green Space while the green spaces along the clifftop at Pakefield are smaller and are not contiguous and are therefore best classified as Local Green Spaces.</p>	<p>No action required</p>
<p>Gunton Warren-</p>		
<p>Simple question. Does this mean that Gunton Warren (which appears to be 'protected' in the document) will not be 'allowed' to be reclaimed by the sea and that Coastal management will take the necessary steps to stop any further loss with sea defences?</p>	<p>The identification of Gunton warren and the wider area of the strategic green space is not directly related to coastal protection.</p>	<p>No action required</p>

<p>It is worth considering they have admitted that the erosion and subsequent loss of beach in the area has occurred much faster than was expected and predicted in the relevant coastal management documents.</p>		
<p>GUNTON WARREN. I have been given to understand that the local adder population may have disappeared in recent years, and that any individuals remaining may not constitute a viable population, in which case I question whether they should be highlighted in support of justification for protection of this area unless there are plans to re-introduce adders and re-establish a viable population. This area historically constituted part of the heathland environment that featured along much of the Suffolk coastline but which has largely disappeared, with only residual pockets remaining. A great deal of work had gone into recreating and maintaining areas of heathland plants, including the heathers from which heathland takes its name, but much of this has been destroyed in preparation for relocation of the sewage pipes further up the cliff to prevent their imminent loss to coastal erosion. Some of the flora on this site is non-native and of questionable biodiversity value in a Suffolk heathland environment e.g. holm oaks. The coastal erosion threat would probably mitigate against future development of this site, even without additional protection, but I totally agree that this should area should be included in the report for protection against development. However, I feel that some refinement to the text is needed to justify the grounds for protection, ensuring that any obsolete information which might expose the report to challenge is removed. Degradation of the site over recent decades cannot be ignored either. The ecology of this area has been seriously threatened and depleted in recent years – burial of oil from the Eleni V at the base of the cliffs, fires both accidental and deliberate, introduction and spread of non-native species, the continuing coastal erosion compounded by the enforced relocation of sewage pipes by Anglian Water and associated destruction. Protection will be required to prevent further depletion of the area’s ecological value, but significant restorative work may also be required. The old WW2 coastal defences are of wider heritage significance because the whole Suffolk coastline was fortified but only a relatively few pockets remain today, so those that still exist have</p>	<p>Support for inclusion of Gunton Warren with the Strategic Green Space is welcomed as are the details provided which will be used to update the description.</p>	<p>Details added to Gunton Warren description</p>

<p>heritage value and significance, and should be included in development of the town's heritage offering.</p>		
<p>I haven't yet managed to read the plan (and my old computer may not allow it) but did manage to view some photos on the cover. I noticed Gunton Warren was shown. Whilst a V.important site, I was a bit surprised as LTC "gave away" the site to ESC several years or so ago. Gunton Warren is actually my top priority, it is an important site, and a friend and I started working there 15+ years ago. I have become increasingly worried about it's management for a number of years. I can't really avoid being blunt and saying that SWT are doing a poor job there. I actually got in touch with [previous] LTC councillors about my V.serious concerns whilst still LTC-owned, but got nowhere before the transfer to ESC and I then had to start all over again..... and ESC are V.difficult to make progress with, and there seems to be absolutely no scrutiny or accountability of the site management. SWT say "we do not discuss our work with volunteers" (despite us knowing the site better than they do and often achieving better results) and ESC claim that as the site is leased to SWT, they have no influence (I find that hard to believe as they are the landowner and a powerful organisation!) so it is like Vikings fighting back to back, a V.effective ,mutual defence - while such an important site basically goes to hell at significant public expense! You may be noticing that I'm V.angry and stressed about all this.....!</p> <p>I contacted Andy Pearce partly in the hope that LTC may still have influence - it's clearly V.V. difficult and stressful for me trying to influence ESC, and ESC councillors don't seem interested in the environment (beyond being photo'd with GWCP). Actually it's truly an utter nightmare. Gunton Warren is a key wildlife site which also has important WW II heritage (tho' two earthworks have just been largely destroyed by Anglian Water) and other amenity value - it should be one of Lowestoft's most prized assets, yet seems to be not just an inconvenience to be neglected, but downright abused!</p> <p>Another key reason I spoke to Andy was that there should be some sensible co-ordination of management of sites adjacent to Gunton Warren, as some</p>	<p>Support for the protection of Gunton warren welcomed and some of the details provided will be used to update the description.</p> <p>Comments on management passed onto SWT and ESC</p>	<p>Details added to Gunton Warren description</p> <p>Comments passed onto the relevant bodies.</p>

<p>wildlife needs space or moves between sites. This needn't be complicated/expensive, just ongoing thought, care, communication and flexibility. Dip Farm is also owned by ESC, but the N.Denes belong to LTC. I have made a few V.simple suggestions to Andy for changes to the denes management regime. I'd V.much like to be able to consult various people and organisations, including the RSPB</p> <p>Gunton Warren has additional upheaval due to the Arrival of Anglian Water. It was actually me that contacted them to check that it was their pipeline under the dunes and did they realise the erosion threat - it seemed to be news to them.! They initially said they would defend the pipes, but we were slow to hear when they changed their mind, decided to re-route and gave the mitigation money to SWT. The better quality heathland habitat that has been destroyed was created by my friend and I (not SWT with their £80k grant from WDC...).</p> <p>Another unwelcome complication is the Norse "upheaval" - we worked with them before SWT suddenly took over, but it makes sense to get them involved again as it should make it easier to co-ordinate the three sites. They also have far more manpower than SWT.</p> <p>There is a tremendous opportunity to achieve something truly special for the long-term future of Lowestoft, but I'm extremely worried as it is probably "now or never", particularly for Gunton Warren, but getting anyone in authority to truly care seems incredibly difficult, everyone seems to prefer to just carry on as they are, and ignore the evidence...but "talk green". I feel trapped in an awful "looking-glass world" here - when it's still not quite too late to improve things dramatically. It probably wouldn't cost that much either - certainly things should be significantly better for less money than is already being spent.</p>		
<p>Gunton Community Park</p>		
<p>GUNTON COMMUNITY PARK. Could the adjacent residents' hall and surrounding open land be added to the Community Park in order to try and afford some protection against future development. One of the local District Councillors has</p>	<p>The intent of the comments is understood but the intent of the policy is to protect undeveloped</p>	<p>No action required.</p>

previously been very vocal in stating her opinion that the hall should be demolished and flats built on the site.	areas and retain them as open spaces rather than to protect buildings.	
Gunton Community Park – I remember playing here as a child back in the 70s & 80s (I lived on Tedder Road from birth – 1971-1995). We used to refer to this as ‘Montgomery Playing Field’. I also remember the concrete train that was part of the play equipment back in the 70s to early 80s, and playing in what we called the ‘wild area’ where Pedders Way now stands. Great memories, and great to see it looking good.	Comments welcome – details will be added to the description.	Details added to Gunton Community Park description
Gunton Community Park – My mother and father were among some of the first people houses in Hollingsworth Road when it was built. When I came along a bit later, I used to play football with all my friends on ‘the playing field’ as we used to call it.	Comments welcome	No action required
Gainsborough Drive		
GAINSBOROUGH DRIVE. Gainsborough Drive itself is a residential estate so what exactly is intended to be included as part of the proposed Strategic Green Space. Just the area in the photo (accessed from Gainsborough Drive via Cotman Close)? What about other publicly-owned land off Gainsborough Drive, such as the Gainsborough Drive pond and surrounding grassy area at Raphael Walk? The pond is all that remains of a larger man-made pond that I believe once belonged to Gunton Hall and can be found on an 1840 tithe map. Should this also be included, as the open space at Raphael Walk is a relict of the Gunton woodland that once covered this whole area, and is therefore part of the same environment as the green space behind Cotman Close but now separated by the road and residential estate. Similarly with the pond behind Vermeer Close, and the pockets of open space that separate (a) Gainsborough Drive from Yarmouth Road, and (b) Degas Gardens from the Harvester and Travelodge. All residual pockets of green space on the Painters (Gainsborough Drive) estate, remnants from what was once contiguous woodland and open space. What about privately-owned land on Gainsborough Drive, including gardens in private residences which adjoin the nearby woodland and form part of an integrated wildlife corridor? We recently had an otter on the loose in some of these gardens. I dare say residents whose ponds were emptied of fish	Gainsborough Drive area defined by map. Areas to be included needs further discussion. Areas being put forward are small and/or ponds. Wording to protect ponds could be added to a policy within the LNDP	Wording added to Policy on Green Infrastructure, Urban Green Spaces and Biodiversity to protect ponds. Additional areas proposed are considered too small and so no action is required.

<p>probably weren't too appreciative of this transient visit by a representative of local biodiversity, but it wasn't too many years ago that otters in this country (and, indeed, in Norfolk and Suffolk) were endangered and were the subject of a major re-introduction and recovery programme. Memories are short: the days of hunting otters may be gone, but other threats including river pollution and development of open spaces are not, and we should not kid ourselves that otters could not find themselves on the endangered list again as a result of pollution and habitat destruction/encroachment. Even today they are classified as Near Threatened in the UK and are fully protected in law. The fact that this otter was wandering through residential gardens is a warning sign itself: otters have large home ranges so, when open space is reduced or becomes disconnected from other open space as the result of development, the local population will come under pressure and individual wandering otters will be forced to cross roads and privately-owned gardens. If those privately-owned gardens are then built on, so that what were wildlife corridors cease to be corridors, then the eventual outcome is not hard to foresee. Pollution of waterways is another serious threat to otters.</p>		
<p>THE NESS. Agree that this area should be included as a constituent of the strategic green space area, although the threat posed by development is minimal given that it is a brownfield site and development is a part of the site's history: the legacy of contamination that remains on the site (fenced-off areas and residual contamination only a foot below the surface beneath an impermeable seal) will in itself be a barrier to development. The accidental introduction of weeds and hemlock with supposedly clean topsoil will have further compromised the ecological integrity of the site. That having been said, the site does still have ecological value: in addition to the rare invertebrates mentioned in the text, there are (or were until recently) I believe also some important plant species on this site. I feel that references to the recent ESC/Concertus development are incidental and do not in themselves provide reason for protection from development, especially when you consider the differences between the proposed project and the end result, and the lash-ups that have characterised that project. The real value of this site as an open space lies outside that project, with the possible exception of the play area and the</p>	<p>Support for inclusion of the Ness in the Strategic Green Space welcomed and details provided will be added to the description.</p>	<p>Details added to Gunton Community Park description</p>

<p>virtual guide. In particular, I feel that reference to recreation of the rope-walk and liver reduction trench should be removed, as these are no longer present in any meaningful form; also the reference to the “stage for hosting events”, as it is unlikely that the stage will ever actually host public events in practice</p>		
<p>OTHER COMMENTS RE STRATEGIC GREEN SPACE AREA. If recreational areas such as Dip Farm and Denes Oval are included as part of this larger area, should Bentley Drive play area not also be in there? At the other end, if Sparrows Nest, Belle Vue Park, and Arnolds Bequest are in there, should High Green (Land next to 2 High Street, where the Town sign stands) not also be included as an adjoining constituent part of the strategic green space. This area has additional historic significance. The High Street got its name not because it was the “main” street, as with high streets in other towns, but because it was quite literally the high street (above the Beach settlement). The report comments separately on the Scores linking the High Street to the Beach settlement, and also on the connection between the Arnold family and Arnolds Bequest. The Grade II listed Arnold House is immediately adjacent to High Green. Jack Cleveland (one of the main protagonists in the Town Hall “riots” of 1933) lived in Arnold House in his final years, until his death in 1980. The open area here was carved out by the devastating Focke Wulf raid of May 1943, which destroyed much of the northern extension of the High Street.</p>	<p>Comments noted</p>	<p>Same comments as other play areas. Question on what size of play area should be included. Add new play area protection policy</p> <p>Town Green to be added to the Strategic Green Space</p>
<p><u>Pakefield</u></p>		
<p>On page 40 of the draft Plan there is a reference to 'a small grassed area fronting the caravan park'. The area which stretches between Cliftonville Road and Arbour Lane, Pakefield, is a dedicated Public Open Space (POS). This came into being in the 1980's by reason of a legal planning agreement between the then owners, Bourne Leisure, and Waveney District Council (WDC). It was agreed that the area would be dedicated as a POS and would comprise the whole of the land between Cliftonville Road and Arbour Lane and would have a depth of 30 metres (100 ft) on which no caravans or structures would be permitted, and access by the public would be un-restricted; (this included any other form of development.) As this is a confirmed POS, I am of the opinion that this status should be included upon and clearly indicated on the intended plan of open spaces.</p>		<p>Does POS offer any protection? We think will be affected by coastal erosion</p>

<p>I have copies of all documentation relating to this agreement., as I carried out the negotiations with WDC.</p> <p>I have not been to the site for some time, but I did notice that the resident of the property abutting the shrub-land section of the POS had made certain adjustments to that area which might imply it was part of that property; of course, that is not the case.</p>		
Normanston Park/Fen Park		
NORMANSTON PARK/FEN PARK. Mention outdoor fitness equipment in descriptions within report?	Support welcome and details will be added to the description.	New details added
Fen Park – It is a lovely tranquil area. Bonus is the swans. I just wish that people were more careful with their litter	Support welcome and details will be added to the description	New details added
Eastern Linear Park		
MAJOR OMISSION: I believe very strongly that the Great Eastern Linear Park should be included as an area of open space to be protected against development in the Neighbourhood Plan. It has ecological, recreational, and heritage (railway history) value. It is a valuable enclave of open space in an otherwise very urbanised area of town, and is popular and valued with local people. On the recent SWT visit, SWT commented specifically on its ecological importance and additionally mentioned that it has some designation as a county wildlife site (albeit a designation which afford no statutory protection or safeguard against development).	Agreed the linear park has amenity and wildlife value and should be added.	Great Eastern Linear Park added as a Local Green Space
<p>This runs from the Yarmouth Rd through to the edge of Normanston Park and is used by school students, shoppers and cyclists. It is also has easy access for people with a disability.</p> <p>Historically it was the rail link to Great Yarmouth, The sides are rich in habitats and there is a stream that runs through it. It is very popular with cyclists as it gives off road access to the retail park and Normanston Park. Suffolk Wildlife Trust have identified it as a rich habitat and Lowestoft Town council are working to improve the flow of the stream and the habitats.</p>	Comments welcomed	Details added to new inclusion of the Great Eastern Linear Park
The piece of land through which the natural spring flows on the northern border of Lowestoft 6th Form College and the Water Lane Sports Centre. This was once managed as a tranquil resting spot with boardwalks for accessibility,	Agreed – include as LGS Refer to report proposing improvements.	Details added to new inclusion of the Great Eastern Linear Park

presumably by one of the local councils, but has fallen into a poor state through neglectful management and has been fenced off from the public for some time now, with no details about when the area will be cleaned up and returned to public use as an amenity.		
St Margarets Play Area		
St Margarets play area and nearby green space on corner of Thurston Rd. Valuable open space (play/amenity area) in a heavily urbanised part of town. Historic significance: this play area is the site of the historic common known as Goose Green (and later Cage Green), mentioned on Page 13 of the report in the text for North Denes. I've not heard of it referred to as Fair Green, and I understand from Ivan Bunn that the site was not actually used as a goose fair, rather it was where the town kept its geese in a pen on what was then the outskirts of town, and they additionally acted as an early warning system if intruders approached the town from that direction. Subsequently a cage was erected on the site to house miscreants, hence the name Cage Green, and apparently there was a nearby set of stocks outside what is now the First and Last.	This is a small play area of which there are many in the Town. Need to decide whether to include all of them or none for consistency unless there are specific and persuasive reasons why one or a few should be included and not others	Addition of protection to all play areas added to the policy covering Recreational and Sports Spaces within the LNDP
Railway Land adjacent Denmark Rd		
Open space in heavily urbanised and former industrial area. Should be maintained as open space for health and wellbeing of residents. Includes former allotment site and not inconceivable that allotment provision could be resurrected at some future point. Additional heritage value: site contains structures of heritage significance, and protection would support and complement work of Community Rail Partnership, station maintenance/development, and wider railway preservation efforts.	Don't think there is any public access to this area.	Not an appropriate site. No action taken.
Elm Tree Open Spaces		
The report mentions Uplands Community Centre, Clarke's Lane, and Rosedale Park, but what about Britten Road and Whitton Green? These represent valuable open/amenity space in an urban area with challenges around economic and social deprivation. Also potentially the Uplands pond, if this is not included within the community centre land, especially as I understand this is located on an otherwise residential estate – parallels with GD pond at the northern end of the parish – and contains a healthy population of fish including common carp and rudd.	Area between Britten Rd and Kirkley Run – quite big – include if not already? Whitton green play area – same comment as above re play areas Uplands Pond- very small area	To be mapped and included See comment about adding play area protection into policy

		Covered in addition of ponds protection so no further action required.
Allotments		
can/should these be protected against reclassification and future development under a Neighbourhood Plan?	These are already legally protected as scheduled allotments	No further action required
Municipal cemeteries and memorial parks		
can/should these be protected against reclassification and development under a Neighbourhood Plan? It may seem unlikely that a cemetery would ever be reclassified and approved for developed, but it is worth remembering that the old Union workhouse in Oulton included a consecrated cemetery that was in use throughout the 19 th Century. Look what is happening there now. The Lowestoft and Kirkley municipal cemeteries are younger and date from the 1880s, so who knows what stance future generations will take towards continuing to give over large tracts of open space in towns where development space is at a premium to the dear and departed, especially when these cemeteries reach capacity and active interments cease.	As the responder says unlikely to be developed – some cemeteries (eg London Rd Beccles – not sure if there are any in Lowestoft) become recreational areas and if so could be included.	No further action required
Bentley Drive		
<p>Include Bentley Drive</p> <ul style="list-style-type: none"> • It is a green space with a play park and serves a relatively new housing development near the A47 roundabout, west, that serves Tesco's. • There are many houses in this area and it is a community space which is in short supply in this development. The play park is due to be refurbished. The green space is surrounded by mature trees and is packed with habitats. It is a peaceful space in an urban setting • The area is used by those living on the estate 	Howley Play area? – quite a big area could be included	Protection is offered through the inclusion of the play area policy addition. No further action required.
St Margaret's Plain		
<p>Include St Margaret's Plain;</p> <ul style="list-style-type: none"> • This play park serves a densely populated area in North Lowestoft on Church Lane. Many of the houses have very small or no garden. It is very popular and is currently being refurbished. 	Area of land is too small to be included	Protection is offered through the inclusion of the play area policy addition. No further action required.

<ul style="list-style-type: none"> • The green space next to the play park could be a picnic area. It was originally the place where geese were allowed to graze and was the edge of the town. • It is not an extensive tract of land 		
The Bleaches		
<p>Include the Bleaches:</p> <ul style="list-style-type: none"> • A play park on the Oulton Road and near Waterlane Leisure Centre. It is opposite St Margaret’s Primary School and used by children who live close to the park or attend the school • It is a popular park with a variety of play equipment and it is owned by ESC. Many of the surrounding houses have very small or no garden and it is a community space where parents or carers can meet and socialise. • It is not an extensive tract of land 	Area of land is too small to be included	Protection is offered through the inclusion of the play area policy addition. No further action required.
Normanston Park		
<p>Normanston Park – Not only is the park a valuable community asset, in terms of public amenity and leisure activity, it’s also important historically as a large surviving piece of the West South Field – one of the three agricultural open spaces which grew the Lowestoft community’s crops. The fall of the land, from both north to south and west to east, necessitated the individual arable strips being ploughed across the slope (not up and down it) in order to prevent soil-creep – especially that generated by wet weather.</p>	Normanston Park is already in as an RSS	No action required

Appendix 5: Informal Consultation Responses

5a: Informal Comments from Suffolk County Council

SCC Informal Comments – Lowestoft draft Neighbourhood Plan (02/09/22)

Please note that these comments are provided as informal guidance prior to the commencement of the Reg14 Pre-Submission consultation.

At this time, internal discussions with Suffolk County Council colleagues have not taken place. During official consultation, the draft plan will be circulated internally for comments from service areas within the county council.

PLAN COMMENTS:

- The neighbourhood plan has no policy map.
It is recommended to create a Policies Map, which shows all of the core themes of the plan and policies in one clear and consolidated image.
Use Figure 1 boundary of neighbourhood plan area, and Figure 7 (Locations of Local Plan Development Sites from the Waveney Local Plan) as a starting point, as this shows allocations for housing and employment.
Recommended to also include Local Green Space sites, recreation/sports sites, community facilities under protection i.e., town hall etc.
Inset maps can be used to show closer details in specific areas, i.e., town centre areas
- Policy numbering is a little confusing.
We suggest simplifying the policies naming to just one code, such as "Policy LOW1, LOW2 etc".
Unclear why flood policy is 'FSW6' and not 'FSW1'
- Figure 4 life expectancies comparison of male & female: should use the same wards (Gunton & Corton / Pakefield) to ensure comparison is accurate.
- Other neighbourhood plans have included a Glossary of Terms as part of their plan. This could include Use Classes.
- Policy LH3 Residential Mix & Standards – the following amendments are suggested:
 1. Residential development should add to the mix, quality and choice of residential accommodation in the area, based on the latest evidence of local need and including housing suitable for the elderly, *such as adaptable and accessible homes built to M4(2) and M4(3) standards.*
 4. Residential development should be flexible to changing needs, including *for an aging population*, home working, and should meet or exceed national space standards.
- Policy EP1 - recommend the following wording to be added:
 6. Street layouts should be designed for low vehicle speeds, with varied provision of parking so that traffic and vehicles do not dominate the public realm, *and in accordance with the Suffolk Design Streets Guide.*

(Suffolk Design Streets Guide: <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/suffolk-design-streets-guide/>)

- Policy EP6, it could be helpful to define what is meant by a "strategic green landscape"
- The designation of Local Green Spaces follows a criteria from the National Planning Policy Framework (NPPF) paragraph 100-103, what is the criteria for a strategic green space?

- Policy EP7 Local Green Spaces: would have been helpful for Figures 17 & 18 to have each of the sites labelled, to provide context.
Could include the criteria from paragraph 102 of NPPF in the supporting text
See also: previous comments provided on Local Green Spaces supporting document (email dated 17/08/22)
- Policy EP8 supporting text states:
"10.47 Policy EP7 does not apply to designated Local Green Space, which is dealt with by similar provisions in Policy EP6. Policy EP5 deals with impacts on the character of parks and gardens."
Clarity is sought here. Policy EP7 is the Local Green Space policy.
- Policy FSW6 & page 45 & paragraph 11.11: it is suggested to remove "urban" from the SuDS definition, as this implies that non-urban areas do not require drainage systems, which could be misleading.
It would be better to read as "Sustainable Drainage Systems".
- Policy TMI1 - Add in references to Suffolk Guidance for Parking & Streets Guide
- Following wording is suggested to be added to Policy TM1:
6 Parking standards must be in accordance with Suffolk Guidance for Parking 2019, or any successor documents. Residential parking should be provided as part of the development, and with a proportion of on-street parking provisions for visitors that is well-designed and integrated to avoid obstruction or impede visibility.

Suffolk Guidance for Parking 2019: <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/Suffolk-Guidance-for-Parking-2019-Adopted-by-SCC.pdf>

General & typos:

- Paragraph 3.3 "the town" is in strikethrough - to delete.
- Paragraph 4.3 says "figure 4 summarises responses to questionnaires", should read "figures 5 and 6"
- Paragraph 7.5 says "identified in figure 3 below" - should read as figure 7:
figure 7 'Locations of Local Plan Development Sites from the Waveney Local Plan' is the image displayed below, on page 20.
- "Figure 7 seafront pavilion site" & referenced to in Policy SW1 - should be "figure 8"
- All following figure numbers are now misnumbered ("figure 8 Seafront Ness Point Site" should be "figure 9" and Policy SW2 should refer to "figure 9" not "figure 8"... and so on)
- Policy ETC1 part 3 reads "demolition of listed buildings or a buildings in a Conservation Area"
= remove "a"
- Policy EP4: the "flowing" key characteristics – do you mean "following"?

5b: Informal Comments from East Suffolk Council



To Sarah Foote, Deputy Town Clerk, Lowestoft
Town Council
By email only:
Sarah.Foote@lowestofttowncouncil.gov.uk

Date: 12th September 2022
Please ask for: Dickon Povey
Direct dial: (01502) 523043

Email: Dickon.povey@eastsuffolk.gov.uk

Dear Sarah,

Re: Draft Lowestoft Neighbourhood Development Plan

Thank you for sending through the above draft neighbourhood plan and supporting documents. Below I have set out our general and detailed comments on the plan. It would be very helpful if you could send me your latest planned timetable for the progress of your plan.

General Comments

Lots of good content and well laid out.

General lack of attention given to the south of the Town including Kirkley and Pakefield. This gives the plan an unbalanced feel.

The huge number of initiatives, infrastructure being delivered, and funding secured could be highlighted much more in the plan. For example, the third crossing receives just one mention which is very frugal for such a significant project in the town.

The plan could include a section on identifying and prioritising infrastructure. Guidance is available here: <https://www.eastsuffolk.gov.uk/planning/developer-contributions/community-infrastructure-levy/parish-support/>

The supporting text in general is quite light. The links and interactions with the local plan policies should be made clearer for the benefit of all readers.

Coastal erosion, particularly at Pakefield, is an important issue. This would seem fitting to reference in the plan, even if no policy follows.

Many Neighbourhood Plans include 'non-policy actions', or 'community actions'. You could consider adding these to the plan to help set out a clear response to local issues and concerns.

Introduction

- Lots of opportunities are available in Lowestoft and there is a very positive picture in terms of initiatives; infrastructure delivery; and funding in the town. Mention of this would be very relevant in the introduction.
- para 1.3 – Waveney Local Plan adopted March 2019 not April.

Vision and Aims

- no. 1 – typo: 'Distinctive'.

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DX: 41220 Lowestoft

- No. 6 – does this mean built, natural, or historic environment? Or all three?

Overview of Lowestoft

- Mention of key pieces of infrastructure progressing in the town would seem very fitting in this section.
- Para. 3.1 - First sentence, could be phrased more positively. Eg. 'Lowestoft is a town in the district of East Suffolk (formerly part of Waveney district) and is the easternmost point in the UK'
- Para. 3.2 - "...A new estate is planned on the outskirts of Lowestoft." If this means the development allocated under local plan policy WLP2.13 (North of Lowestoft Garden Village), then 'estate' is not quite accurate as it will provide a mixed-use development including housing, employment, a primary school, green infrastructure amongst other things.
- Para. 3.3 - "It is divided by Lake Lothing..." - sounds a touch negative. 'Lake Lothing is found in the centre of the town...' or similar would sound less negative.
- Para. 3.3 – typo at beginning of third line (The town)
- Para. 3.4 - This should reference industries which are showing growth as well as supporting others. Tourism and the importance of the visitor economy should be mentioned.
- Para. 3.6 - Agreed. Heritage assets provide a significant opportunity as an attractor and contributor to economic growth.
- Para. 3.6 – there are two Conservation Areas, rather than several.
- Para. 3.6 – this should reference both the North Lowestoft Heritage Action Zone and the London Road, Lowestoft High Street Heritage Action Zone.
- Para. 3.7 - More detail and more up to date information is available for this section. We can assist if needed.
- Para. 3.8 – you could include data around how the population is trending. Eg. getting older/younger
- Table at 3.9. This should also include:
 - East Suffolk Council Leisure Strategy
 - Historic Environment Supplementary Planning Document (SPD)
 - Affordable Housing SPD
 - Sustainable Construction SPD
 - ESC Waveney Local Plan
 - Lowestoft Town Centre Master Plan
 - London Road, Lowestoft High Street Heritage Action Zone and Seafront Masterplan

Reference to the documents in the list at 3.9 as relevant throughout the neighbourhood plan would also enhance the document; signpost readers to valuable information; and aid with consistency between documents. The Lowestoft Neighbourhood Plan could act as a grand vision for the town that yokes these other documents together.

East Suffolk Council documents that could provide useful information about the provision of green space and sports pitch provision.

- Waveney Green Infrastructure Strategy <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Green-Infrastructure-Strategy.pdf>
- Waveney Open Space Needs Assessment <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Open-Space-Needs-Assessment.pdf>
- Pitch and Outdoor Sports Facilities Assessment <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Playing-Pitch-and-Outdoor-Sports-Facilities-Assessment.pdf>

The above documents will provide evidence to support the Lowestoft Neighbourhood plan in terms of the demand and supply of green space and sports pitches. Using and referencing these documents would also help to reduce the risk of the Lowestoft Neighbourhood Plan potentially conflicting with the Local Plan and its evidence base.

Community and Stakeholder Engagement

- Table, p. 13: 'LTC is a stakeholder on the Lowestoft Place Board and Lowestoft Town Centre Master Plan'
- Para. 4.2 – These don't seem to be purely 'issues', could these be referenced as 'issues/opportunities' or 'matters'?
- P. 14 – is there any narrative around this data that could be added to the plan to enrich the reader's understanding?

Overall Growth Strategy

- Para. 6.1 - Government debt is included as a consideration here. How does this affect Lowestoft and what is the impact of this on the neighbourhood plan? This should perhaps be balanced against the projects in the town which have benefitted from Government funding.
- Para. 6.2 – this paragraph reads like housing need and housing affordability are not issues in Lowestoft. I think this would benefit from re-wording so that it is clear that these are issues, but the challenges of viability, employment and economic development are also key. The local plan deals with the level of growth in the district and growth strategy in and around Lowestoft.
- Para. 6.4 - will all of these documents be available for reg. 14 consultation? Eg. Statement of Consultation; Statement of Basic Conditions.
- Para. 6.6 – most of the sections have strong elements of 'economy' in. The 'Economy and Town Centre' section may be better renamed so that it doesn't give the impression that's where all the economy policies are found. Could be something like 'Town Centre – Vitality and Heritage'
- para 6.8 – typo? Rationale not rational?

Seafront and Waterfront Section

- Little to no reference to heritage and Conservation Areas.
- Content relating to the south of the town is notably lacking in this section.
- Para. 7.1 – what is meant by '21st century waterfront'? What does this look like and what does it do? Perhaps some of para. 7.4 could be moved here and expanded.
- Para. 7.4 – this references allocating two sites in the neighbourhood plan. However I do not see any of the sites in this section as allocations on which specific new development will take place. They are worded broadly and speculatively and therefore do not seem to be suited to be termed 'allocations'.
- Para. 7.8, final sentence – the land between Pakefield and Kessingland is not in an Area of Outstanding Natural Beauty (AONB). The AONB starts south of Kessingland. It does have protection from local plan policy WLP8.36 'Coalescence of Settlements'.
- Para. 7.10, first sentence – the importance of good design is understood and agreed, but there is no basis given for the statement in this statement. This should be re-worded or removed.
- Para. 7.12 – refurbishment has been completed.
- Para. 7.13 – the seafront pavilion is not identified for development in the local plan.
- Repetition in para. 7.16 and 7.18.

SW1 Seafront Pavilion

- The site is referred to in the plan using 'seafront pavilion' and 'east point pavilion'. It would be clearer and simpler to use just one.
- Refurbishment of this building has been completed and it is fully in use to support tourism and visitor uses. Discussion of redevelopment of this site therefore would be speculative, rather than a certainty. The policy references independent design review, suggesting there are plans/interest for new development. Therefore this policy does not seem to make sense when reading it.
- Perhaps this policy should be re-worded to apply to any potential future development on the site. 'Allocated for development' suggests there is a strong likelihood a specific type of development will take place, so I suggest reconsidering use of this wording. This doesn't seem like an allocation. It is fine to set out objectives for any potential future development on the site, but making it an allocation does not seem appropriate.
- If it is not clear if a policy allocates a site for a particular type of development this can complicate screening the plan for the need for Strategic Environmental Assessment or Habitat Regulations

Assessment.

- Part 1 references 'display' and 'exhibition'. What is the difference between the two?
- Part 1 – should food and drink be included? They seem to be very successful.
- Part 2 applies to the surrounding public realm, but the red outline of the policy is drawn tightly round the building. Some re-writing of this policy might help to make it clearer how the policy is intended to be applied. Is it just to the red outline; the surrounding area; or a mixture of both (in which case make it clear which parts are for the red outline and which are for the surroundings)?
- c.: development on this site may not include the surrounding area and public realm. This criterion should be re-worded to add flexibility.
- 2. D – this references higher buildings going on the site. What is the view on demolition of the existing building and new building(s) in its place? Does the plan support this, oppose it, or something else?
- Repetition of design review in 7.16 and 7.18.
- Supporting text should acknowledge that the existing building falls within a Conservation Area and also the setting of several listed buildings and structures, including the outstanding Grade II* listed Royal Norfolk and Suffolk Yacht Club. Although the included text on design aspiration and quality is welcome, other constraints needs to be referenced here also.

Policy SW2 – Seafront Ness Point

- '2. Development ~~must~~ should comply with the following development principles:'
- 2. – does this part apply to just the visitor centre, or is this allowing other types of built development to take place? Additional clarity and explanation would help here.
- Part of the red outline seems to include part of the existing car park associated with Birds Eye. The red outline should be checked.
- 2a – This criterion seems to be written to try and achieve overlooking of the whole seafront and nearby public realm. This is unlikely to be possible as the seafront and public realm is a large area and development in this area is likely to be very limited. This part may benefit from some slight re-wording to re-focus on the design of new buildings and how it relates to the surroundings. Eg. 'new buildings should provide active frontages with a strong, positive relationship to the public realm and/or seafront.'
- C – how should the scheme take account of Ness Point if it is developed at the northern end of the red outline? Some additional clarity/guidance on this criterion would be very helpful.
- the high-quality public realm is supported and links with aims of the Cycling and Walking strategy along the sea wall. Obviously, this is all dependant on the environmental agency's opinion.
- Does the red outline actually cover Ness Park?
- The supporting text is very light in general here.

SW3 Kirkley Waterfront Site

- This section lacks reference to the local plan allocation WLP2.4 and the Sustainable urban neighbourhood and Kirkley Waterfront development brief (<https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Supplementary-Planning-Documents/SUN-and-Kirkley-Waterfront/Adopted-Development-Brief.pdf>)
- Mention of the whole extent of the local plan allocation should be included. This policy cannot be read in isolation. Clarify that this policy will apply only to the part of the allocation which falls within the neighbourhood area.
- This section should recognise how the local plan policy WLP2.4 and the adopted development brief focus employment uses on the waterfront that this policy applies to. Your neighbourhood plan should address this as it needs to achieve general conformity with the local plan policies.
- 1. – this supports residential use at the waterfront area, but this could conflict with employment uses taking place there, potentially generating nuisance complaints from new residents. Also, the flood risk on this part of the site is highest, as identified in Waveney Local Plan para. 2.38.
- 2a – public access to the waterfront is a good objective, but it may not be possible to all sections of the waterfront – for example where commercial use takes place. The local plan focuses employment uses (B1, B2, B8) on the former Jeld Wen and Riverside Rd areas. Therefore this criterion should be re-worded to provide some flexibility.
- Food and drink uses on this site could undermine the town centre therefore these should not be

the main uses here.

- 2c – again, pedestrian access may not be possible in all instances, therefore re-wording to add flexibility should take place this criterion. Clear sight lines may not always be possible, but the policy could say something like: ‘development proposals should demonstrate how sight lines in-to, out-of, and through the development have been incorporated into the design and layout.’
- 2e – consider replacing ‘superior environmental performance’ with ‘maximise the potential for energy efficiency’. This is wording recently used by an Examiner for the Bungay plan.
- 2e – what is a ‘higher building’ considered to be? Presumably these should be accompanied by an appropriate visual and townscape assessment, also considering the wider setting.
- Para. 7.23 – this should recognise port uses that support growth in Lowestoft and are a key selling point for the town.

8. Economy and Town Centre

- This section should reference the Town Centre Masterplan; London Road Lowestoft High Street Heritage Action Zone; South Lowestoft HAZ and Seafront Masterplan; The Scores and Triangle Feasibility Study; The Powerpark Design Vision; and the North Lowestoft Heritage Action Zone Design Guide. Including reference to these in the policies would give them material weight in decision making. If there are specific elements of these which you think should be particularly followed then these can be specifically referenced.
- Greater recognition of the South Lowestoft, the Beach, Kirkley etc. would seem very relevant to this section.
- Para. 8.4 - Bullet point 3 states that policy WLP8.20 refers to Existing tourist accommodation, whereas it should be policy WLP8.17.
- Para. 8.6 – ‘Lowestoft’s economy has shifted from fishing and manufacturing in recent years’ – a more detailed time frame would help readers to understand this.
- Para. 8.8 – ‘East Suffolk Council aims to improve this offer across Lowestoft’ – reference to specific plans/strategies/initiatives could be added here.
- Para. 8.9 - Good to see recognition that the town centre needs to diversify.
- Para. 8.12 - 8.12 should the word ‘cultural’ be inserted here: ‘Development of the former post office and Battery Green car park will address the need for a central leisure offer’.

Policy ETC1

- Should there be a similar policy for the London Road South shopping centre?
- The red outline for the town centre in the north of the town is very large. It takes in areas that appear to be residential, such as in the north of the town. Applying the policy in a blanket fashion over the entire area does not seem like an effective way of achieving the objectives. The local plan takes a more refined approach to setting policy for the different areas of Lowestoft town centre. You could consider doing similar and even use the local plan areas/frontages. If the plan retains the boundary as shown in this version, it should be evidenced as to why this is considered to be a suitable area.
- Reference to the local plan policies and what they do in the town centre would be helpful here. It should be clear for readers of the plan that two sets of policies will need to be applied.
- 1. - This lists different areas of the town centre, but perhaps these should reflect areas defined under the Lowestoft HAZ or the town centre masterplan. It also refers to the London Road South, but this isn’t within the policy area. Both these documents need referencing in this section more generally.
- 3 – in a Conservation Area, does this only apply to buildings which contribute positively to special architectural/historic interest?
- 3. - Stating that redevelopment of buildings will not be supported where it involves the demolition of listed buildings or buildings that contribute positively to a conservation area could be too inflexible because in some cases demolition might be necessary. For listed buildings it is necessary to consult NPPF paragraphs 199-202. There is a risk that the text about buildings in a conservation area may not be consistent with Local Plan policy WLP8.39.
- 4. This is a very large geographic area with a great range mix of uses to require class E uses. It is probably better to reduce the size of the town centre area and bring town centre uses together.
- 4 – should this be made more specific? This leaves the policy open to interpretation and, while

unlikely, there is a chance a use not supported by the town council could slip through. Class F1 is mentioned in the interpretation, could this be included in the policy with any others?

- 5 – does this include Houses of Multiple Occupation?
- 5 – this supports residential uses – has consideration been given to the provision of open space and/or amenity for these new residents? Lowestoft town centre is generally lacking in green spaces, therefore how might this be addressed? If there are ideas for this they could be put forward in the plan.
- 6 - references upward extension, whilst it is subject to other policies, it would be helpful to be clearer here on what you are looking for. The town centre doesn't include significantly tall buildings, usually between 2-4 storey. This could be detrimental to some of the historic buildings/townscapes in the town centre.
- 7 – ground floor frontages must create shop fronts/active frontages. This is a very large area to apply this strict policy requirement to.
- 7 – the Heritage Action Zones are promoting reinstatement of traditional shop frontages. This could be referenced here and given material weight.
- 8 – reuse and refurbishment may not require planning permission. This should be referenced so that readers are clear that this policy will only apply when planning permission is required and a planning application is submitted.
- 8. – this should refer to the 'North Lowestoft Conservation Area.' Reference to the North Lowestoft HAZ would be appropriate.
- 8. - the wording for this criterion needs revising as follows. There is no Town Centre Conservation Area. Parts of the town centre are included within the North and South Lowestoft Conservation Areas, although parts are not in either. It would be better to expand the umbrella of this policy item by including all historic buildings and structures. There are plenty of unlisted historic buildings in Lowestoft town centre (and not in Conservation Areas) that would benefit from the protection of this policy.
- As the policy references Conservation Areas these should be shown on the map in fig. 10
- Ambitions for the town centre public realm could be addressed here.

ETC2

- 1. - Reference should be made to the Lowestoft Town Centre Masterplan. This policy appears to exceed the vision of the Masterplan by including a requirement for an enterprise space. It would be worth elaborating on what an enterprise space is – will it compete with employment areas in the nearby Power Park? It is also necessary to explain why there is this divergence between Lowestoft Neighbourhood Plan and the vision of the Lowestoft Town Centre Masterplan.
- 2. – this uses the wrong wording as the test for proposals for the Grade II listed Town Hall. The wording here is the Conservation Area test; the correct test should be that proposals will preserve the special interest of the listed building. They should also, of course, either preserve or enhance the character or appearance of the North Lowestoft Conservation Area, and this wording could also be included here – if it's needed.
- 4. – is this intended to apply to land outside of the red outline as it is drawn? If so, the red outline should be adjusted so that the policy is precise over what land is being protected for parking.
- 4. – parking should be looked at in a broader context. Parking might be better achieved on other nearby sites. ESC is not supportive of restricting land in their ownership in the locality to car parking.
- Very little supporting text to this policy.
- It seems relevant to reference that the authors of the neighbourhood plan are the owners of this site.
- This should reference the listed status of the site.
- Reference to the Heritage Action Zone; Conservation Area; and heritage policies would also be relevant.
- As LTC are the owners of this site and authors of this plan, it would be helpful to describe how the objectives for this site have been established. Has it been developed following public engagement for example? Some narrative here would help the community and any other readers of the plan to understand why the plan is trying to achieve what is set out.

ETC3

- Despite the title, the policy does little to address tourism.
- What is meant by 'enterprise uses'?
- B. – does this refer to the existing employment areas identified in the local plan (WLP8.12)? If so, it should say so. If not, then further clarity should be provided. WLP8.12 protects B1, B2 and B8 uses in these areas, subject to criteria. The policy should address WLP8.12 as it will need to achieve general conformity with it.
- The WLP8.12 employment sites are home to some heavier industrial type uses. It would not be desirable to replace these for Class E uses, which are better located in the town centre.
- Would tourism uses be supported in WLP8.12 employment sites?
- The Power Park local plan allocation (WLP2.2) should be protected from class e uses.
- B. – there are local and district shopping centres in Lowestoft allocated in the local plan where retail can take place.
- C. – This can only apply to the Kirkley waterfront site in the neighbourhood area. It would be better to try and address this in policy SW3. A town centre policy does not seem the correct place for this. This part of the policy will need to be in general conformity with the local plan policy and address the adopted design brief.
- D. – Clarification over what makes a 'suitable scheme' would be valuable.
- E. – This criterion needs much greater clarity around the objective and the detail. Residential areas are not normally appropriate for this use. This could generate significant problems in residential areas. Hot-desking and co-working space would be better located around transport hubs; shops; town centre etc.
- This policy seems to open up options for class E uses to take place in a broad range of sites outside of the town centre. This could potentially damage the vitality and viability of the town centre. Has this been assessed/considered? The limited supporting text states that it sets out suitable locations for class e uses to take place, but it potentially opens up a lot of *unsuitable* places for them to take place. I think great care and more clarity is needed with this policy and its impact upon the viability and vitality of the town centre should be addressed and/or tested. This could conflict with aims and objectives of local plan policy WLP8.19.
- 1. – size limits on new class E uses coming forward outside of the town centre could be considered in order to mitigate impacts on the town centre.
- Para. 8.18 – Whilst we agree with the sentiment, this statement is subjective, and does not specify how much employment is based at home. We would suggest that significantly more employment still takes place in the workplace, especially within the retail, visitor, and port activity sectors described. The occupancy levels of managed workspace in the town indicate demand for full time occupancy of premises and not just demand for co-working space.

Section 9

- HMOs should be addressed in this section. What is the view on these? They are restricted in parts of Lowestoft due to the concentration of them in some areas.
- The importance of local centres as places of commerce, and social activity is omitted. Lowestoft suffers with socially isolated communities and local centres offer the community a place to reconnect and address such issues.

Policy LH1

- How does the policy view HMOs?
- For clarity, reference to the local plan settlement boundary should be included.

Policy LH2

- Has there been engagement with the landowner of this site?
- 1. 'Development of the Former Lowestoft Hospital site ~~must~~should comply with the following development principles:'
- The palette of materials used for the new buildings should ~~include~~complement those used in the historic building ranges, though these may be combined with green materials and construction to

~~create superior environmental performance~~ maximise the potential for energy efficiency'. (See comment on SW3 re: energy efficiency wording)

Policy LH3

- 2. – This is a good objective, but screened storage space within the curtilage of every house is not likely to be possible, therefore some flexibility around this requirement should be incorporated. More clarity would be helpful, such as how the plan sees this part of the policy applying to flats and communal areas.
- 3. – an explanation of 'tenure blind' should be added.
- 4. - The Written Ministerial Statement to Parliament of the Secretary of State (CLG) on 25 March 2015 included the following: "From the date the Deregulation Bill 2015 is given Royal Assent, local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings". (my emphasis) Therefore meeting or exceeding national described space standards would conflict with the statement. This element of the policy should be removed.

Para. 10.3

- The wording is confusing. The start of the paragraph refers to NPPF chapter 11, but the second sentence refers back to NPPF chapter 8 (where paragraphs 101-103 are located).

Para. 10.5

- This paragraph should be moved so that it sits at the end of this section. At the moment it is located within several paragraphs that deal with the NPPF and as such interrupts the flow of the text.

Para. 10.9

- Missing: WLP8.34 Biodiversity and Geodiversity and WLP8.35 Landscape Character

Para. 10.11

- This paragraph references the Waveney Strategic Play Evaluation Action Plan. This paragraph makes the assertion that Lowestoft scored worse across the board for the provision of play space quality for toddlers, juniors and teens than elsewhere in Waveney (except Halesworth and Holton). However, the overall scores for Lowestoft appeared to be higher than other settlements (besides Halesworth and Holton) and so this assertion needs to be checked.

Para. 10.12

- This should also reference the London Road Lowestoft High Street Heritage Action Zone.
- The Scores and Triangle Market Feasibility Study identified 12 new pocket parks that could reimagine wasteland behind the Scores as green open spaces for communities and visitors
- given that this plan will last until 2036, this sentence could easily be misconstrued in the future as meaning that there is some special kind of 'zone' in the High Street and Scores area well beyond the lifetime of the HAZ schemes. I suggest that clarification is made here to state that the HAZ is an area-based time-limited project. It will conclude in 2023, but could be extended.

Para. 10.13

- North Lowestoft has 3.5 ha per 1000 people; South Lowestoft has 2 ha per 1000 people.

Para. 10.18

- Building for Life 12 is now named Building for a Healthy Life.
- What evidence is there that local plan policy WLP8.29 is problematic in historic areas? Such a claim should be clearly justified and explained, otherwise it should be removed as it could create a tension between the neighbourhood plan and local plan where the two will be far more effective if they complement one another. The reference to polite buildings and vernacular architecture is also not explained. These should be fully covered if it is to be retained in the plan.

Para. 10.19

- The North Lowestoft Conservation Area Appraisal and Management Plan is fully adopted and is no longer in draft. The reference here needs to be updated.

Para. 10.21

- Detail could be added here around the three types of open space which are considered to be important. There is a need to clearly differentiate clearly between open space, greenspace, play space and sports field provision. There needs to be more clarity within the section of what the LGS's are and then a reference to the supporting information. This text should refer to supporting document 2 (not document 4),

Para. 10.28

- Increased biodiversity is considered in the South Lowestoft HAZ and Seafront Masterplan; Station Quarter Feasibility Study; and the Town Centre Masterplan. This could be incorporated here.

Para. 10.33

- this could usefully explain that design should respond to context and need, and that early engagement of ecological and landscape expertise can help achieve a design which achieves this.

para. 10.36

- typo = pallet should read palette.

Policy EP1

- The principles here are acceptable, but they tend toward being generic. Given the criticism of the local plan design policy for being vague, it is not totally clear how this policy addresses this.

Policy EP2

- The intentions of this policy, particularly in relation to ensuring that development has no adverse impact on biodiversity and that development achieves biodiversity net gain are welcomed, however I think that the policy wording could be simplified by combining criteria 1 and 2 together. Reference to how biodiversity net gain should be measured should also be included. I'd suggest that criteria 1 and 2 are replaced with wording along the following lines:

1. Development must have no overall significant adverse impact on biodiversity. Any identified adverse impacts must be mitigated, including with positive building design and landscape features to enhance developments for wildlife. Development should achieve biodiversity net gain, which must be measured using the latest DEFRA biodiversity metric available at the time of submission of the proposal for planning permission.

- In terms of setting a requirement for biodiversity net gain in the absence of a mandatory requirement, the following policy from the Worlingham neighbourhood plan came out of the successful Examination recently:
 - A. Proposals for major development (e.g. 10 or more dwellings) in the Neighbourhood Plan area must provide for a minimum Biodiversity Net Gain of 10% that is secured for at least 30 years and is subject to the following criteria:
 - The whole of the net gain must be delivered on site unless exceptions permitting off-site delivery within the neighbourhood plan area are formally agreed with the Local Planning Authority;
 - In the case of a development site spanning the neighbourhood plan boundary, the 10% (minimum) Biodiversity Net Gain requirement of this policy applies to that part of the site lying within the neighbourhood plan area;
 - Biodiversity Net Gain should be measured using the most recently available Biodiversity Metric at the time of the submission of the planning application, unless otherwise agreed with the Local Planning Authority.
The requirements of this policy will be superseded by legislative requirements once mandatory Biodiversity Net Gain comes into force.
 - B. Proposals that identify, protect and enhance wildlife corridors in the Worlingham Neighbourhood Plan area will be supported where they provide a net gain in biodiversity, through creation and enhancement of natural habitats, and restoring fragmented biodiversity networks. These must be designed and implemented to maximise their wildlife

value, provide connectivity through the site for terrestrial and aerial species. They must exploit suitable opportunities to link with the maintained and varied habitats provided by established residential gardens adjacent to the site. They must also be maintained as dark corridors as far as possible to increase their value for nocturnal species.

- 3. – strategic housing sites – for the purposes of this neighbourhood plan this surely just means Kirkley Waterfront Development? It would be helpful to be precise about this. This already has an adopted design brief which is not mentioned here. The policy should reflect this.
- 3. – should the masterplan plan all aspects of the site, or just those relating to green infrastructure, green spaces and biodiversity?
- 4. B – biodiversity improvements such as a longer flowering season can be provided by using carefully chosen non-native species of plants.

Policy EP3

- Suggested re-wording. Use of 'must' without specific justification is unlikely to get through an examination. *'Development taking place on the Port site identified on Figure 14 should demonstrate how any environmental impacts are mitigated through taking opportunities to improve the site, its boundary and environs.'*
- This policy covers the northern shore of Lake Lothing, as well as the outer harbour. As such it covers the same land as several Local Plan allocations: WLP2.10 (Inner Harbour Port Area), WLP2.3 (Peto Square), WLP8.18 (New Town Centre Use Development) and WLP2.2 (Power Park). However, none of these policies are referenced. Policy EP3 is very high-level, and it is not clear what it would add to existing Local Plan policies.
- Reference to the flood defence work should be included.

Policy EP4

- Criterion 1 needs re-wording. The statutory Conservation Area test of preserve or enhance the character and appearance of the Conservation Area can only be applied inside the Conservation Area and not for development adjacent. However, development adjacent can be considered for impacts arising on its setting.
- 1. – typo 'flowing' should presumably read 'following'.
- Identifying specific characteristics of the Conservation Area is supported.
- The North Lowestoft Heritage Action Zone Design Guide should be referenced.

Fig 15: North Lowestoft Conservation Area.

- There is a difference between this map and the North Lowestoft Conservation Area Appraisal Map. The southeast corner of conservation area is drawn differently at Spurgeon Score. ESC can assist with sharing map layers if you wish.

Policy EP5

- This policy is welcomed. The importance of parks and gardens is welcomed – they are important features of both Conservation Areas.
- 2. – the south pier is referenced here. Do you wish to reference Claremont pier too?
- Justification for the South Pier being a non-designated heritage asset should be included, either in the main plan document or a supporting document. Appendix 6 of the Waveney Local Plan provides criteria for identifying these assets.
- 4. – requiring development adjacent to historic parks and gardens to enhance *and* have no adverse impact on their setting and character is a very high bar. It would be more proportionate to say: 'Development adjacent to historic parks and gardens must enhance ~~and~~ have no adverse impact on their setting or historic, architectural or landscape character.'
- The supporting text at para. 10.39 needs expanding. Many readers will not know what is contained in Section 72, for example.

Policy EP6

- It would add to the policy/supporting text to include references to the Gunton Meadow County Wildlife Site and Gunton Warren nature reserve. Gunton Warren is managed by Suffolk Wildlife Trust and owned by ESC. Indicating these on the map in fig. 16 would be useful.
- There are also substantial parts of this green space which is protected as open space under Local Plan policy WLP8.23.
- Part 2 of the policy is very strict. As this is an extensive and varied piece of land which is in different ownerships and used for different functions, some flexibility around what might be supported in this area would help to make an effective policy. Otherwise, the justification for powerful protection of such a large and varied area must be convincingly put forward.
- The justification for protecting this land could be clearer. To preserve openness for its own sake? To protect the beauty/biodiversity value?
- What is the role of this land over the plan period? This could be improved with some objectives and prior thought about how this space could be enhanced and function over the period of the neighbourhood plan. Are there any aspirations for this space (or the smaller spaces within it) to be enhanced, if so this policy could contain recommendation that developments within a certain distance or that could increase recreational pressure on it should make some contribution towards its enhancement and protection.
- This could be seen as a negative policy being used to limit development in Lowestoft. Protecting an area of this size needs good justification and evidence. The plan is currently light in these regards.
- Some of the land covered by the policy here is owned by ESC. ESC may resist parts of this policy. Our Asset Management team may want to consider this further.

Policy EP7

- It would be useful to identify on the map which green space is which.
- Reference should be made to Supporting Document 2.

Policy EP8

- It would be useful to identify on the maps which space is which.
- 2. – I think this may need to be amended to read: 'Development adjacent to formal recreation and sports spaces must take opportunities to enhance, and should have no significant adverse impact on, their accessibility, amenity or safety.'
- Para. 10.44 – this references footpaths which does not sound right when looking at the protected areas.
- Para. 10.47 – the policy references here need checking.
- Para. 10.48 – this does not seem to be relevant to this policy.
- ESC may consider resisting inclusion of some of the sites listed here. Our Asset Management team may consider this further.
- Supporting text: should reference Local Plan open space designations. The Playing Pitch and Outdoor Sports Facilities Assessment also provides useful information about the demand for and supply of sports pitches and other facilities in Lowestoft and this should be referenced.

Flooding

- This section could make more mention of the Lowestoft Flood Risk Management Project – what it will deliver; the resultant outcomes for Lowestoft; predicted timescales etc.

Policy FSW6

1. - Its not clear whether this means development that worsens flood risk elsewhere would not be permitted or that adverse impacts to any occupants of the site should not occur.
2. - How should existing flood attenuation areas be identified?
3. – how are flood sensitive areas defined or identified?

- This policy should include reference to climate change allowance.
- Criteria 1, 2 and 3: it is difficult to see what these contribute over and above national policy and local plan policy. It doesn't look like it is necessary to include these. Neighbourhood plan policies which repeat local or national policy are likely to be removed by an Examiner.
- 4. – this should probably stipulate that this applies to new development involving these types of hard surface.
- 5. – SuDS don't affect water use – they are a means of disposing of water.

Transport and Movement

- This should reference the existing Waveney Cycle Strategy and reference the emerging East Suffolk Cycling and Walking Strategy.

Policy TM1

- 2 – perhaps the wording needs to be tweaked so that it recognises the User hierarchy? The Manual Streets and Suffolk Design Guide can offer more guidance.
- Whilst the aim of 2b is supported and it may work for new housing estates, low traffic speed will be dependent on the road type and may not be possible where development is adjacent a main road.

Para. 12.13

- Improved foot and cycle paths are included in the Town Centre and South Lowestoft HAZ and seafront masterplans.

Sustainable Energy

- Para. 13.1 - this para. could do more to differentiate between the renewable energy sector (the suppliers), and renewable energy schemes (the demand).
- Para. 13.7 – which 'Powerpark project' is being referred to here?

Supporting Document 3 – development sites

- Page 9 Heritage – the South Lowestoft Conservation District should be the South Lowestoft Conservation Area.
- P. 9 - this paragraph should acknowledge that the pavilion falls within the setting of several listed buildings and structures, including the outstanding Grade II* listed Royal Norfolk and Suffolk Yacht Club.
- P. 9 - I think that the wording – which sort of forms a design brief but is provided under 'Heritage' - should be more coherent and articulate and should have its own heading – 'Design' perhaps? Phrases like 'blend in with' and 'texture' should be avoided.
- Page 12 Heritage – The Ness currently sits within a Heritage Action Zone, but, of course, will not do so after March 2023. I suggest that this reference, therefore, is qualified as it will soon be out of date in terms of the lifetime of the Neighbourhood Plan.
- P.12 – wording on design again under a heading on 'Heritage'. Design matters deserve their own heading, as it is not the same thing as heritage.

If you wish to explore or discuss any of the above then feel free to contact me.

Yours sincerely,

Dickon Povey

Dickon Povey | Principal Planner (Policy and Delivery)
East Suffolk Council

Appendix 6: List of Consultees for Regulation 14

Organisation	Contact Details
East Suffolk Council	Riverside, 4 Canning Road, Lowestoft, NR33 0EQ
Suffolk County Council	Endeavour House, 8 Russell Road, Ipswich, Suffolk, IP1 2BX
East Suffolk Councillors (covering wards in Lowestoft)	
Suffolk County Councillors (covering wards in Lowestoft)	
Natural England	consultations@naturalengland.org.uk
Environment Agency	planning.ipswich@environment-agency.gov.uk
Historic England	eastplanningpolicy@historicengland.org.uk
National Trust	EE.customerenquiries@nationaltrust.org.uk
Network Rail Infrastructure Limited	steve.taylor@networkrail.co.uk
Highways England	planningEE@highwaysengland.co.uk
Marine Management Organisation	consultations.mmo@marinemanagement.org.uk
Vodafone and O2 - EMF Enquiries	EMF.Enquiries@ctil.co.uk
Three	jane.evans@three.co.uk
Ipswich & East Suffolk CCG & West Suffolk CCG	planning.apps@suffolk.nhs.uk
Transco - National Grid	nationalgrid.uk@avisonyoung.com
UK Power Networks	stakeholder.engagement@ukpowernetworks.co.uk
Anglian Water	spatialplanning@anglianwater.co.uk
Essex & Suffolk Water	martin.lunn@nwl.co.uk
National Federation of Gypsy Liaison Groups	natglg@outlook.com
Norfolk & Suffolk Gypsy Roma & Traveller Service	jo.richardson@norfolk.gov.uk
Suffolk Chamber of Commerce	info@suffolkchamber.co.uk
New Anglia LEP	iain.dunnett@newanglia.co.uk
New Anglia LEP	marie.finbow@newanglia.co.uk
RSPB	philip.pearson@rspb.org.uk
Sport England (East)	philip.raiswell@sportengland.org
Suffolk Constabulary	leigh.jenkins@suffolk.pnn.police.uk
Suffolk Wildlife Trust	info@suffolkwildlifetrust.org
Suffolk Preservation Society	director@suffolksociety.org
Suffolk Preservation Society	lindasc@suffolksociety.org
Community Action Suffolk	sunila.osborne@communityactionsuffolk.org.uk
Community Action Suffolk	sarah.mortimer@communityactionsuffolk.org.uk
Suffolk Coast & Heath AONB	paula.booth@suffolk.gov.uk
Theatres Trust	planning@theatrestrust.org.uk
East Suffolk Internal Drainage Board	planning@wlma.org.uk
Peter Aldous MP (Member of Parliament for Waveney)	peter.aldous.mp@parliament.uk
Oulton Parish Council	clerkoultonparishsuffolk@hotmail.co.uk
Oulton Broad Parish Council	clerk@obpc.uk

Gisleham Parish Council	gislehamclerk@gmail.com
Carlton Colville Parish Council	clerk.cctc@gmail.com
Corton Parish Council	Corton-Parish-Clerk@outlook.com
Friends of Fen Park	friendsoffenpark@gmail.com
Friends of Kensington Gardens	robert.breakspear59@gmail.com
Suffolk Wildlife Trust	info@suffolkwildlifetrust.org
Most Easterly Community Group	mosteasterlycommunitygroup@gmail.com
Gunton Residents Association	marion_trowbridge@yahoo.co.uk
Lowestoft Cricket Club	mattpatnell.ltcc@outlook.com
Lowestoft Lawn Tennis Club	peteraldous117@yahoo.co.uk
Kensington Gardens Bowls Club	peter.browne7@outlook.com
Sparrows Nest Bowls Club	peteandles091@gmail.com
Pakefield Riding School	pakefieldridingschool@hotmail.co.uk
Barnard's Soccer School	barnards@sentinellt.co.uk
Upland's Community Centre	uplandsc@outlook.com
Lowestoft Vision	danny@steelandco.co.uk
Catch 22	daryl.bates@catch-22.org.uk
Our Park	getfitnow@ourparks.org.uk
Friends of Dip Farm	marion_trowbridge@yahoo.co.uk
Kirkley People's Forum	info@kirkleypeoplesforum.org.uk
Community Action Suffolk	info@communityactionsuffolk.org.uk
Lowestoft Field Club	chris.fieldclub@btinternet.com
Friends of The Denes	friendsofthedenes@gmail.com
Lowestoft in Bloom	lowestoftinbloom@gmail.com
Community Action Suffolk - Kirkley Peoples Forum	matthew.grafton@communityactionsuffolk.org.uk
NHS Norfolk and Waveney	m.page@nhs.net
Old Hospital	daniel@shreeveproperty.co.uk
Community Rail Partnership	officer@communityrailnorfolk.co.uk
DANES	disabilityforum@danesonline.co.uk
Diocese of Norwich	info@dioceseofnorwich.org
East of England Health Protection Team	EastofEnglandHPT@PHE.gov.uk
Public Health Suffolk	HealthandWellbeing@suffolk.gov.uk
Tingdene	info@tingdene.net
ABP	kate.moran@abports.co.uk
Orbis Energy	orbisenergy@suffolk.gov.uk
East Suffolk Council Asset Management	assetmanagement@east Suffolk.gov.uk
The Ashley School Academy Trust	office@ashleyschool.co.uk
Benjamin Britten Academy of Music and Mathematics	office@benjaminbritten.school
East Coast College	heretohelp@eastcoast.ac.uk
East Point Academy	epacontactus@inspirationtrust.org
First Base Pupil Referral Unit	admin@firstbase.suffolk.sch.uk
Gunton Primary Academy	office@guntonprimary.org
Harbour Pupil Referral Unit	admin@harbourpru.suffolk.sch.uk

Northfield St Nicholas Primary Academy	office@nsnacademy.com
Old Warren House School	admin@oldwarrenhouse.suffolk.sch.uk
Ormiston Denes Academy	info@ormistonden.es.co.uk
Pakefield High School	info@pakefield.org.uk
Pakefield Primary School	admin@pakefieldprimarieschool.org.uk
Phoenix St Peter Academy	office@phoenixstpeteracademy.org
Poplars Community Primary School	admin@poplars.suffolk.sch.uk
Red Oak Primary School	office@redoakprimary.org
Roman Hill Primary School	admin@romanhill-pri.suffolk.sch.uk
St Margaret's Primary Academy	admin@st-margarets.suffolk.sch.uk
St Mary's Roman Catholic Primary School	office@stmarysrcps.org
Elm Tree Primary School	office@elmtreeprimary.suffolk.sch.uk
Grove Primary School	office@groveprimarieschool.org
Warren School	office@warrenschoo.l.co.uk
Westwood Primary School	admin@westwoodprimary.org
Bus Service	fga.communications@firstgroup.com
Girlguiding District	ggnadmin@girlguidingnorfolk.org.uk
District Scouts	info.centre@scouts.org.uk
Marina Theatre	info@marinatheatre.co.uk
Lowestoft and District Football League	david.beecher@btinternet.com
Lowestoft and Yarmouth Football Club	secretary@rufc.club
RNPSA Museum	hq@rnpsa.co.uk
Maritime Museum	admin@lowestoftmaritimemuseum.co.uk
War Memorial Museum	warmemorialmuseum@btinternet.com
Lowestoft Heritage Centre	john.stannard@lowestoftheritage.org
Jesters Diner	info@jestersdiner.com

Appendix 7: Responses to Regulation 14 Pre-Submission Consultation (January 2023)

Consultation Comments	Response	Actions
General Comments		
General: We need a simple mechanism (or point of contact) who can liaise with public about management of green spaces (biodiversity etc.). Very difficult via Councillors. Applies to ESC, LTC etc.	Noted – contact arrangements not within the scope of the LDNP	Pass comment onto East Suffolk Council
Doesn't say much regarding our charity - Lowestoft Shopmobility - and Station Square on whether building work will happen on Commercial Road, particularly on QD site	This site is within the Town Centre and any future development proposals will be guided by policy Low3.	No change required
Page 27: 8.13: Please consider access for all in everything you do	Noted – disability access is not within the scope of the LNDP	No action required
Education As the Neighbourhood Plan follows the same development proposals as the East Suffolk (Waveney) Local Plan, SCC already has strategies in place to mitigate the growth. (additional information provided)	Noted	No action required
Chapter 3 SCC notes that archaeology has not been considered in the Plan. Chapter 3 could be enhanced with the inclusion of a section providing an overview of the town's history and could include mention of the characteristic Scores as well as information on the town's early origins, fishing heritage, and historic port. Furthermore, this could include information held in the County Historic Environment Record (HER) which holds records of Lowestoft's archaeology and heritage.	Neighbourhood Plans do not need to cover all aspects of land use planning and the Town Council has decided not to include policies on archaeology. Evidence and justification in the plan should only relate to policies in it. The Waveney Local Plan includes a number of policies to protect the historic environment including WLP8.37 - 40	No action required.
Having looked at the so-called redevelopment plan for Lowestoft, maybe I missed something, but I cannot see any mention of the New River Crossing which will link North and South Lowestoft, and no mention of integrating Bus Services. (In fact the plan skirts the new crossing without any mention). With the new crossing providing new routes across town, there are multiple possibilities of linking new bus routes or rerouting existing	Neighbourhood Plans do not need to cover all aspects of land use planning and the Town Council. The new River Crossing is underway and policy guidance is already within the Waveney Local Plan.	No action required.

<p>ones across town which are non-existent at present. Not only will such new services link new and existing work areas and communities, but reduce the congestion around the Bus Station. New or rerouted existing services could loop via the Railway Station for town centre access, and likewise by the Asda Supermarket area. All it needs is a little thought, especially for those with limited access, Mums with buggies, disabled, etc. With circulating bus services skirting the top and bottom of both London Roads will help reduce congestion, pollution, and frustration, plus encourage more people to visit the main shopping centres. Another major opportunity is for bus-routes to have integrated services via towns and villages with new or existing links between Ipswich and Lowestoft which are currently lacking.</p> <p>I hope that my observations have helped move the thinking cogs to engage possibilities not yet included.</p>	<p>The routing of bus services is not within the scope of the LNDP</p>	<p>Comments passed onto the County Council's Public Transport Section</p>
<p>There is no mention of the Gull Wing river crossing here which is extremely relevant to this section. There are very few mentions of this throughout the document despite it being such a key piece of infrastructure for the town. Are there any aspirations to build on the benefits the crossing will deliver? The Flood Risk Management Project is also of relevance in this section and should be referenced more in the plan.</p>	<p>Neighbourhood Plans do not need to cover all aspects of land use planning and the Town Council. The new River Crossing is underway and policy guidance is already within the Waveney Local Plan and the Flood Risk Management Project is not a land use issue.</p>	<p>No action needed</p>
<p>Digital departure boards located at the seafront and port areas which show vessels scheduled for arrival could promote interest and understanding to the town and allow greater understanding when the bridges are raised for vessels.</p>	<p>This is not within the scope of the LNDP</p>	<p>Comment will be passed onto the Port Authority</p>
<p>Work needs to be done with Highways to improve road network maintenance and upkeep. Unnecessary road signage/furniture should be removed to de-clutter the roads (traffic light signs, other hazard signs when the hazard is clearly visible ahead etc) and defunct, defective or broken road furniture/signs promptly removed/repaired.</p>	<p>This is not within the scope of the LNDP.</p>	<p>Comment will be passed onto the County Council's Highway Department</p>
<p>Work needs to be done with Network Rail to reduce the time it takes for a cycle to complete at the Level Crossings in the town; currently a full cycle is</p>	<p>This is not within the scope of the LNDP.</p>	<p>Comment will be passed onto network rail</p>

unnecessarily too long.		
Digital integration is key for all aspects of the plan and needs to be considered in all aspects of public realm design/development.	Not sure what change, if any, this comment is suggesting	No change required.
2.2: Realistically people are going to the retail parks for mainstream stores so the town centre should be focussed at niche, local and speciality businesses. Waterfront regeneration is absolutely vital and this should tie in with new and emerging businesses to support and help them flourish (Jet Adventures to think of one brilliant example).	Support for waterfront regeneration is welcomed. The Lowestoft Town Centre masterplan and the Lowestoft Town Investment Plan make similar proposals for the Town Centre.	No action required
7.12: Provisions for hire of water-sports equipment could be provided by the council, local charity or organisation to promote health and wellbeing, improve mental health and get more people outside exercising and enjoying our seafront. This is something not currently done.	This is not within the scope of the LNDP.	Comment will be passed onto East Suffolk Council
It should be made a priority and an absolute must to re-develop and repurpose existing brown field sites/derelict buildings/buildings falling into disrepair contained within Lowestoft before any new developments in rural settings/countryside are considered.	Comments welcome – the LNDP makes proposals for the redevelopment of brownfield sites and contains policies to protect green spaces.	No action required.
Overall, I liked what I saw. Your vision seems to match my own. I look forward to seeing what Lowestoft can become with proper stewardship.	Comments welcome	No action required.
Tidy up approach to town - Fish Dock, Artillery Way etc. As visitors come in on A12 they must be persuaded to stop, not drive past. It is a disgrace. Weeding/maintenance needed.	This is not within the scope of the LNDP.	Comment will be passed onto East Suffolk Council and Suffolk County Council
Replace street lighting in Artillery Way/Yarmouth Road. Very, very dark road the roundabout approaches. If we have to put up with bright lighting in Sussex Road until 11:15pm and again at 6am, why isn't the main road similarly illuminated?	This is not within the scope of the LNDP.	Comments will be passed onto Suffolk Highways and Highways England
Your plan does not address specific problems in the town - state of the old High Street etc.	The Plan contains policies which complement the Lowestoft Town Centre masterplan and the Lowestoft Town Investment Plan. Policy LOW3 in particular makes positive proposal for suitable uses in the Town Centre as a whole including the old high street.	No action required
<i>Typographical Errors</i> In paragraph 3.8, there is a typographical error in the second sentence. It	Agreed	

<p>currently reads “This Fund enables work to progress on fiver major regeneration projects”, whereas it would be easier to discern meaning if adjusted to “fiver major regeneration projects”.</p> <p>In paragraph 7.13, there is an “and” in strikethrough, however, SCC believes this should be retained. In paragraph 7.16, there is a typographical error. It currently reads “The aim of the Policy is to achieve exemplar design, to creative a positive symbol”, whereas it would be easier to discern meaning if adjusted to “to creative a positive symbol”.</p>		<p>Amendments to be made as recommended.</p>
<p><i>Policy Titles</i></p> <p>Whilst reviewing the Policies, SCC noticed an inconsistency in the Policy titles. Within its blue Policy text box, Policy LOW1 is labelled as “Policy LOW1 – East Point Pavilion Site”, as does Policy LOW2. Policy LOW3 then does not contain a title on what the Policy entails, i.e., it simply reads “Policy LOW3” but it does retain a descriptive title in the heading above the Policy, as displayed in the table of contents. SCC requests that a consistent format is used throughout, to aid the reader’s understanding of the Policies and their intentions.</p>	<p>Agreed</p>	<p>Policy Titles will be amended to be consistent</p>
<p>SCC welcome Figures 7 and 8, Policies Maps for North and South Lowestoft respectively. However, without a Key, it is not abundantly clear which designation (i.e., Site Allocation, Local Green Space, Strategic Green Landscape) that each shaded colour refers to. Whilst this can be readily deciphered from other figures throughout the document, to provide additional clarity for the reader a Key denoting the relevance of each shaded colour would prove a beneficial amendment – see below:</p> <ul style="list-style-type: none"> • • Blue Outline – Strategic Green Landscape • • Orange Outline – Recreation and Sports Sites • • Red Outline – Site Allocations / Conservation Area • • Green Outline – Local Green Spaces <p>Furthermore, the orange outline appears nearly transparent on the current Figures and cannot be easily identified without close inspection, SCC would request that this is outline is opaquer.</p>	<p>Agreed</p>	<p>A key will be added and clearer colour delineation used. The Policies Map will show the Plan area and use inset maps to show detail which will be referenced by policy number.</p>

<p>It is also strongly recommended to include the Neighbourhood Development Plan Area boundary in Policies Maps, as displayed in Figure 1.</p> <p>The main purpose of a Policy Map is to clearly display the main policies of the Plan in one clear and consolidated image. Inset maps can be used to show closer details, such as town centre areas, where identified features would be lost and/or hard to read on the overall Policies Map.</p> <p>SCC also suggest clearly labelling the sites displayed on the Policies Maps, similar to the labelling in Figure 9.</p>		
<p><i>Supporting Documents</i></p> <p>SCC also notes that there are some inconsistencies with the numbering of the Supporting Documents, as the Protecting Open Landscapes, Sports Fields and Local Green Spaces supporting document is referenced as Supporting Document 2, 3, and 4 throughout. This is also the case with the other Supporting Documents.</p> <p>It is also noted that, at the time of writing, the Protecting Open Landscapes, Sports Fields and Local Green Spaces supporting document is the only supporting document that has been published on the Town Council’s consultation page. It is recommended for all Supporting Documents mentioned in the Plan be publicly available. As noted above, the Strategic Green Landscape, which is shown in Figure 19 of the Plan as a single large-scale site. However, the Supporting Document refers to Strategic Green Space Areas (as indicated in Figures 3 to 13) as discrete and individual sites. Therefore, SCC recommends that the Plan and Supporting Document should be consistent in their approach</p>	<p>Agreed</p>	<p>References to supporting documents will be corrected. The other Supporting Documents will be added when the Plan is submitted.</p> <p>The areas within the Strategic Green Landscape in the Open Space Supporting Document are to show how the wider area is constituted and this will be explained more clearly in the document.</p>
<p><i>General Inaccuracies</i></p> <p>Regarding Policy LOW15, SCC queries the word choice of “effected by” and believes that this should be “affected by”.</p> <p>Paragraph 3.2 refers to a “new mixed-use development” between Great Yarmouth and Lowestoft, SCC recognises this as the North Lowestoft Garden Village and suggests this is overtly mentioned in the paragraph.</p> <p>Paragraph 7.5 refers to Figure 7 as identifying the development sites allocated in the East Suffolk (Waveney) Local Plan, however, Figure 7 is the</p>	<p>Agreed</p>	<p>Recommended changes will be made.</p>

<p>Policies Map for North Lowestoft. Paragraph 7.5 should actually refer to Figure 9.</p> <p>Paragraph 10.13 refers to data comparing Outdoor Playing Space provision in North and South Lowestoft to the National Playing Fields Association’s recommended minimum standard but does not mention Figure 15 which interprets this information. SCC, therefore, suggests that paragraph 10.13 should refer to Figure 15.</p> <p>Figure 14 is described as identifying the Port site in Policy LOW10, however, Figure 14 displays the Former Lowestoft Hospital site. Policy LOW10 should actually refer to Figure 16.</p> <p>Figure 15 is described as identifying the North Lowestoft Conservation Area in Policy LOW11, however, Figure 15 is a graph showing outdoor playing space provision. Policy LOW11 should actually refer to Figure 17.</p>		
<p>Make us proud to be North Lowestoft residents - not ashamed of the area.</p>	<p>The LNDP makes proposals which complement other plans which collectively seek to do this</p>	<p>No action required.</p>
<p>Stop wasting money.</p>	<p>It’s not clear what the respondent considers is wasting money.</p>	<p>No action required</p>
<p>Generally favourable. More reuse/recycle of vacant/brownfields.</p>	<p>Comments welcome – the plan does seek to reuse brownfield land</p>	<p>No action required</p>
<p>All new housing and commercial premises should have solar panels. No more caravan/lodge developments. Sort Tingdene. Clearer marking cycle routes. Stop pavement parking.</p>	<p>Policy LOW17 supports local energy schemes. Green spaces and Strategic Green Landscape policies (e.g LOW13) seek to protect open spaces from inappropriate development. It is not clear what the respondent wants changing at Tingdene. Policy LOW16 prioritises the needs of convenience of pedestrians and cyclists. Pavement parking is not within the scope of the LNDP.</p>	<p>No action required.</p> <p>Comment passed onto East Suffolk Council</p>
<p>We welcome the production of this neighbourhood plan and are pleased to see that the historic environment and its potential to be a key driving force for Lowestoft’s future economic, social and cultural vitality is recognised throughout. In particular, we are pleased to note that heritage</p>	<p>Comments welcome</p>	<p>No action needed</p>

led-economic development is identified as one of the plan's nine key aims (Aim 7).		
Paragraph 3.7 - we welcome the mention and highlight of the Heritage Action Zones, but would note that these are time-limited projects rather than heritage designations in themselves, and that the conservation areas are called the North Lowestoft Conservation Area and South Lowestoft/Kirkley Conservation Area respectively.	Agreed third sentence should be clarified.	Amend 3 rd sentence of para 3.7 to say 'The Neighbourhood Development Plan Area encompasses the North Lowestoft and South Lowestoft Conservation Areas and the time limited North Lowestoft and London Road Heritage Action Zones.'
We recommend that the Policies Maps on page 18, are accompanied by a Key that identifies what the annotations relate to. At present this is not clear.	Agreed a key is needed	Add a key to the Policies Map.
You can also use the neighbourhood plan process to identify any potential Assets of Community Value in the neighbourhood area. Assets of Community Value (ACV) can include things like local public houses, community facilities such as libraries and museums, or again green open spaces. Often these can be important elements of the local historic environment, and whether or not they are protected in other ways, designating them as an ACV can offer an additional level of control to the community with regard to how they are conserved. There is useful information on this process on Locality's website here: http://mycommunity.org.uk/take-action/land-and-building-assets/assets-of-community-value-right-to-bid/ .	Assets of Community Value are not designed though the Development Plan. It is a separate process under the Locality Act.	No action required
<i>5.8 Growth across the Neighbourhood Area of Lowestoft should not be to the detriment or loss of green space and will be concentrated around the potential development of brownfield site. Please take into consideration</i>	Noted	No action required

<p>the fact that brownfield sites are often more biodiverse than greenfield areas, attracting diverse pollinators.</p> <p><i>See: McCallum R., Sardo A.,(2021) 'Britain's Rainforests'. engaging the public with brownfield sites for conservation in the U.K. Journal of Science Communication 20(4).</i></p>		
<p>We welcome the aims of the neighbourhood plan to facilitate sustainable growth and regeneration of Lowestoft supported by a high-quality environment. Given the impacts of climate change, we would support the inclusion of 'sustainable and resilient communities' (Aim 5) to recognise future challenges for coastal communities and the need for adaptation to flood risk and sea level rise.</p>	Comments welcome	No action required
<p>We consider that Aims 6 and 9 will help to deliver a high-quality environment supported by an enhanced network of green and blue infrastructure. Such interventions will provide multifunctional benefits, and we would support the inclusion of sustainable drainage systems to minimise the risk of surface water flooding.</p>	Comments welcome	No action needed
<p>Figure 7 - We suggest that a legend for the Policies Maps will help to ensure legibility and should also show the neighbourhood plan area boundary given that the urban extent of the town falls within surrounding parishes</p>	Agreed – a key is required	Add a key to the Policies Map
<p>Flooding and Coastal Erosion - These challenges for Lowestoft have informed the development of the Lowestoft Flood Risk Management Project that aims to improve flood defences and progress a tidal barrier. Anglian Water recognises these challenges for Lowestoft and our own networks and assets, and we are a partner in this project.</p>	Noted	No action needed
<p>As highlighted previously, our work to relocate sewers at risk of coastal erosion at Gunton Warren demonstrates the action we have taken to</p>	Noted	No action needed

address these challenges in cooperation with the local community and the Wildlife Trust		
The Town Council has not provided up-to-date biodiversity information with their Consultation Draft, identifying ecological / wildlife corridor network maps and data on priority species etc. The Plan therefore does not accord with the relevant sections of the National Planning Policy Framework [namely Paras 8, 28, 31, 174, 175 and 179].	It is not a requirement that Neighbourhood Plans should contain policies and supporting evidence on ecology and biodiversity. The Town Council has decided not to cover this issue in the LNDP.	No action required.
The Town Council has not provided up-to-date biodiversity information with their Consultation Draft, "promot(ing) the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species" and therefore their Plan does not accord with the relevant sections of the National Planning Policy Framework [namely Paras 8, 28, 31, 174, 175 and 179].	It is not a requirement that Neighbourhood Plans should contain policies and supporting evidence on ecology and biodiversity. The Town Council has decided not to cover this issue in the LNDP.	No action required
Aim 5 of the draft Lowestoft neighbourhood plan is to 'create a sustainable community, supported by a range of community facilities and housing to meet local need'. This aim highlights the importance of accessible healthcare being viewed as a community facility to meet local need. This is supported by paragraph 4.2 in the Community & Stakeholder Engagement section, where access to healthcare was rated bad overall by those consulted.	Access to healthcare can be a matter for LDNP where the development of new healthcare facilities is proposed. There are no such proposals in Lowestoft. Other aspects of access are outside the scope of the LNDP.	Comment passed onto the CCG
Section 7 of the plan focusses on the seafront and waterfront areas of Lowestoft. Specifically supporting the regeneration of the area to promote economic development and diversity in living accommodation. With any regeneration and increase in housing and therefore population in the area, thought needs to be given to the impact placed upon the local healthcare service. Wording could be added to the interpretation and guidance section to highlight consideration on healthcare impact.	As above	Comment passed onto the CCG
Section 9 relates to living and ensuring new residential developments meet the needs of existing and incoming populations, this is encouraged through the plan in locations close to community facilities, this would be	As above	Comments passed onto the CCG

<p>particularly important for care facilities or older living accommodation to enable greater independence and easy access to facilities, especially healthcare. The ICS would welcome further information within this section to reflect and acknowledge the comments above.</p>		
<p>Point 9.5 of the plan references the Waveney Local Plan identifying a significant need for new sheltered and extra care housing and also care homes. Whilst this may be the case, thought should be given to the location of these developments/dwellings and the impacts on the local healthcare services. Accessibility considerations include factors such as proximity to main roads and/or public transport services, position near a retail area to promote independence and exercise, proximity to an attractive residential community and quantity and convenience of parking if residents have cars. As previously mentioned capacity at local GP surgeries is limited and the residents within the dwellings described above often require a higher frequency of healthcare contact, again supporting the importance of location and accessibility. The age profile of the potential residents is an important factor for the ICB and Health Partners, as people at both ends of the age spectrum consume a disproportionately larger quantity of healthcare services and resource. Over 75's are more likely to have multiple long-term conditions and complex care needs. Analysis from EEA activity 2019/20 indicates that residents aged 65 years and over account for over 35% of Category 1 ambulance activity and 52% of all activity. This supports the need for healthcare to be considered within the Neighbourhood plan and highlights the importance of access and availability of healthcare services.</p>	<p>As above</p>	<p>Comments passed onto the CCG</p>
<p>The ICS would welcome the addition of a simple statement to confirm that Lowestoft Town Council will support the ICS in ensuring suitable and sustainable provision of healthcare services across all sectors for the residents of Lowestoft through CIL (community infrastructure levy) contributions. If unmitigated, the impact of developments on healthcare services in and around the Lowestoft neighbourhood plan area would be unsustainable, including that of Primary care, Community care, Mental Health, and Acute care.</p>	<p>Agreed a policy referring to the Lowestoft Infrastructure Plan should be added to the LNDP and a community aspiration to attract CIL funding in recognition of the role of the Town in providing service and employment to a wider hinterland.</p>	<p>Add Policy as follows: POLICY LOW? – INFRASTRUCTURE All development in Lowestoft will be expected to contribute to the infrastructure requirements for the Town</p>

		<p>in accordance with the Lowestoft Infrastructure Plan.</p> <p>Add Community Aspiration 1 as follows – In recognition of the role of the Town in providing services and infrastructure for the Town, adjoining Parishes and surrounding hinterland, Lowestoft Town Council will seek CIL and other funding to implement the schemes identified in the Lowestoft Infrastructure Plan.</p> <p>Add supporting text</p>
Not had time to go through the whole document however, hoping there will be plans to develop frontage around the area of new bridge with houses - private and social - as well as places of interest such as cinema, restaurants, coffee shops with opportunities for jobs for local residents	Yes see policies for the Kirkley Waterfront	No change needed
Why are you wasting money on 'cultural development' in the town no one will visit in great numbers so as a proportion of population it's a non-runner	Noted	No action required
Impressive amount of work	Comment welcome	No action required
We didn't think it necessary to comment in detail on the draft Neighbourhood Plan as we consider it sets out a sensible approach to managing new development in the area. However, we suggest that the main policies map would be improved by adding a key to make it clearer what the different colours/designations refer to – we appreciate that this	Support welcome – the policies map does need a key	Add a key to the policies map

<p>becomes clearer later in the document but it would be useful to have this clarified upfront, on the single consolidated plan.</p>		
<p>General Comments</p> <ul style="list-style-type: none"> • A lot of very good content • The plan is clear and well laid out. • There is a huge gap in the plan when it comes to addressing the south of Lowestoft. There is a focus on the centre and north of the town but the plan seems to overlook much of south Lowestoft. It is not clear why this is the case. • There have been many positive changes in response to comments we provided on an earlier draft of this plan which we are very pleased to see. • Much of the supporting documentation referred to in this draft of the plan has not been shared and is not available on the Town Council's website. • Some of the maps are lacking legends. • There are several studies and strategies relating specifically to Lowestoft which have been developed and published recently which are relevant to the neighbourhood plan's aims. There is scope to make further reference to these in the plan which will help underpin and guide the plan's policies. This is picked up in our comments in the table below. 	<p>Comments are welcome.</p> <p>The Plan is subject led and the geographic representation follows that. It is not the purpose of the plan to make a proposal or propose a policy to achieve 'fair geographical representation'. However, policies should be added for the South Lowestoft Conservation Area and the London Rd South and Kirkley Shopping area.</p> <p>The only supporting document relevant to this stage in SD2 dealing with open spaces and this was publicly available.</p> <p>Other strategies will be added to the list in para 3.10.</p>	<p>Expand para 3.10 to cover other relevant strategies identified in the policies.</p> <p>Add polices for the South Lowestoft Conservation and London Rd South and Kirkley Shopping Area</p>

<p>The vision is very short. It could be expanded to include some locally distinctive aspects of Lowestoft. It could be expanded to cover more of the elements that are outlined in the Aims. For example, more focus could be put on the natural environment and housing as key elements of this plan that have not been directly referenced in the Vision. The aims are also brief and it feels like they could be more distinctive to Lowestoft. E.g.: Are there particular business sectors that are of importance to the town? Include mention of the beach. Any benefits you would like to maximise and build on as a result of infrastructure projects like the third crossing or the flood risk management project? Include initiatives such as Heritage Action Zones. Without referencing specific local details then this section runs the risk of feeling a little generic.</p>	<p>Noted – but a short vision statement and the statement of aims are considered appropriate</p>	<p>No changes required</p>
<p>3.4 National planning policy, the East Marine Plan, and the Suffolk Minerals and Waste Plan also form the basis for determining planning applications.</p>	<p>Agreed the role of the Development Plan in determining planning applications and the Minerals and Waste Plan should be referred to in para 3.4.</p>	<p>Amend para 3.4 to read: 'There is a presumption in favour of development and infrastructure proposals which are supported by the Development Plan which for Lowestoft comprises the Waveney Local Plan, the Minerals and Waste Plan and, in due course, this Lowestoft Neighbourhood Development Plan.'</p>
<p>3.8 Details of the five Towns deal projects would be helpful. Sp.: 'This Fund enables work to progress on five major regeneration projects...'</p>	<p>Agreed – further information about infrastructure and funding will be included in the new Infrastructure section to support the proposed new Infrastructure Policy and Community Aspiration</p>	<p>Add Infrastructure section to the Plan</p>

<p>Including the objectives of the Lowestoft Investment Plan would be very beneficial for this section.</p>		
<p>Fig 6 This chart shows that cultural and waterfront aspects could be better in Lowestoft. Accordingly, the neighbourhood plan should reference the ongoing and delivered projects to deliver the seafront vision and towns deal projects. If you need any details or information about these types of projects ESC would be happy to assist.</p>	<p>The Plan is not a reference document and adding further background information is not necessary</p>	<p>No change required.</p>
<p>The Basic Conditions Statement There are references to a 'Statement of Basic Conditions' which doesn't seem to be available. Presumably this will be part of the documents when the neighbourhood plan is submitted to the Local Planning Authority. These references are confusing for readers when included in the plan at this stage and without the referenced documents.</p>	<p>The statement of basic conditions will be added when the plan is submitted</p>	<p>Add the statement of basic conditions to the supporting documents</p>
<p>Minerals Suffolk County Council is the Minerals and Waste Planning Authority for Suffolk. This means the County Council makes planning policies and decisions in relation to minerals and waste. The relevant policy document is the Suffolk Minerals and Waste Local Plan⁸, adopted in July 2020. SCC note that the Minerals and Waste Local Plan is not mentioned as a relevant planning policy document throughout the Plan. As this document forms part of the Development Plan and thus should be read in conjunction with the East Suffolk (Waveney) Local Plan and other key evidence to support and inform the Plan, SCC instructs that this should be included in paragraph 3.10 under "Other Evidence". The following information seeks to highlight the importance of the Neighbourhood Plan mentioning the Minerals and Waste Local Plan as a relevant document. This information is to provide context to the Neighbourhood Plan Steering Group and does not need to be included in the Neighbourhood Plan.</p>	<p>Agreed</p>	<p>Add reference to the Minerals and Waste Plan in para 3.4 – see amendment above – and add the MWP to the list of strategies in para 3.10 (as 'instructed'!)</p>

<p><i>Minerals and Waste Local Plan Policy</i></p> <p>The majority of the Lowestoft settlement area sits within the minerals safeguarding area as defined by Policy MP10: minerals consultation and safeguarding areas and as outlined on the Safeguarding and Proposals Map9. This area can also be viewed on the Interactive Map of Waste Location of Interest10 by enabling the “consultation area” overlay (this can be activated via the tab in the lower right corner).</p> <p><i>Safeguarded Sites</i></p> <p>There are a number of minerals and waste sites which are safeguarded under the Suffolk County Council’s Minerals and Waste Local Plan 2020, the Local Planning Authority must consult the Local Minerals and Waste Planning Authority on any proposed developments falling within 250m of safeguarded sites. Policy MP10: minerals consultation and safeguarding areas will apply to all these developments detailed below:</p> <p><i>Water Transfer Facilities</i></p> <p>WTF14 – Oulton Broads P W Walters Ltd</p> <p><i>Marine Wharves</i></p> <p>W2 – Hamilton Dock, Lowestoft Port Authority W3 – North Quay, Lowestoft Port Authority</p> <p><i>Metals and End of Life Vehicles</i></p> <p>MELV4 – East Point Metal Trading Ltd – End of life Vehicles</p> <p>There are also some protected sites which sit just outside the settlement boundary (within the South Lowestoft Industrial Estate and on the Kessingland/Gisleham boundary), which the Neighbourhood Plan Steering Group should be aware of as developments that are proposed on the settlement boundary may interact. These are detailed below:</p> <p><i>Waste Transfer Facilities</i></p> <p>WTF7 – Former Brickworks and Pipework’s site – Lowestoft E E Green & Son Ltd WTF35 – Lowestoft Waste Transfer Station, Hadenham Road Anti-Waste Ltd WTF9 – Lowestoft Hales C R</p> <p><i>Metals and End of Life Vehicles</i></p>		
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<p>MELV11 – Lowestoft Vehicle Car Breakers Pendle John Harry MELV7 – Lowestoft (Vehicle Dismantlers) Hales C R All these sites can be located, with further details, on the Interactive Map of Waste Location of Interest11.</p>		
<p>Policies Map no keys have been provided on the policies maps. These should be added to show what the polygons on the maps represent. The policies map should also include the outline of the Neighbourhood Area. The primary shopping area is missing from these plans. The north and south Conservation Areas could be added.</p>	<p>Agreed</p> <p>Agreed the North Conservation area should be added to the Policies Map (Policy LOW11). There is currently no policy for the South Lowestoft Conservation area but one will be added.</p>	<p>Key will be added to the Policies Map and all the policies which can be geographically identified will be shown.</p> <p>Add the North Lowestoft Conservation area to the Polices Map</p> <p>Add a new policy for the South Lowestoft and Kirkley Conservation area.</p>
<p>Chapter 7 – Seafront and Waterfront</p>		
<p>Para 7.1 <i>To modernise the waterfront and seafront to increase its attraction to tourists and visitors...</i> – this objective is ok in general, but care should be taken around how this objective is applied to the Kirkley Waterfront site due to complexities around achieving waterfront access in the Lowestoft part of the site. See comments of LOW2 for further details.</p>	<p>Noted</p>	<p>No change required</p>
<p>Para 7.6 Should this be indented further to match the other paragraphs in this part of the plan?</p>	<p>Agreed</p>	<p>Indent para 7.6</p>
<p>Para 7.10 <i>“The temptation for the strategic housing sites and other key sites may be to adopt a development-at-any-cost approach, including acceptance of poor design.”</i> – What is the foundation for this statement? Without a basis</p>	<p>Para 7.10 is a positive statement recognises the possibility of low-quality development and the importance of ensuring that design policies are properly applied. The comment provides</p>	<p>No change required</p>

<p>this type of statement is not very helpful. A build at all costs approach is not supported by East Suffolk. The plan should take an objective stance and be informed by sound evidence.</p>	<p>assurance that East Suffolk supports this approach and is welcome.</p>	
<p>Para 7.11 This para discusses reductions to Affordable Housing requirements. The Local Plan policy WLP8.2 allows for this where it is evidenced by a viability assessment. This should be clearly reflected in the neighbourhood plan text. Additionally, the statements regarding environmental performance, running costs etc. in this paragraph do not seem to be reflected in the Plan's policies. This mismatch between this paragraph and the content of the plan's policies should be addressed.</p>	<p>Para 7.11 implicitly accepts that viability assessments may lead to a case being made for reduced proportions of affordable housing. It seeks to ensure that this should only be acceptable where there is a trade-off for improved environmental performance.</p>	<p>No change required.</p>
<p>7.12 This section needs rewording. In 2017 Hemingway Design provided a seafront vision, and the first development of this was the Pavilion along with the Eastern Edge beach huts (no mention of these). In 2022 ESC undertook a seafront masterplan that expanded on the vision to bring forward further sites and public realm. This should also be referenced: https://thinklowestoft.co.uk/seafront-masterplan/</p>	<p>Comment accepted</p>	<p>Amend para 7.12 to read: 'East Suffolk Council, Lowestoft Town Council and the local community have a common aspiration to create a modern, attractive waterfront and seafront. In 2017 Hemingway Design provided a seafront vision, and the first development of this was the Pavilion along with the Eastern Edge beach huts (no mention of these). In 2022 East Suffolk Council undertook a seafront masterplan that expanded on the vision to bring</p>

		forward further sites and public realm – see https://thinklowestoft.co.uk/seafront-masterplan/
7.13 Typo – a crossed out ‘and’	Comment accepted – remove crossing out	Remove crossing out.
LOW1		
7.15: The Pavilion and Royal Plain is the first thing people see when arriving at the seafront. With many seaside towns across the UK, the biggest problem is that they are outdated, gone with the times and poorly maintained. The whole Royal Plain area needs to be well maintained with greenery, unique street lighting/street furniture designs and modern up to date signage. It needs to be kept clean and the area modernised with new modern architecture.	Agreed – the policy does require inspirational architecture for a strong seafront identity. Maintenance is not within the scope of the Lowestoft NDP	No change required
East Point Pavillion Site: whilst we do not have an objection to the general principle of this policy as set out in the first sentence, clarity should be provided regarding what is meant by ‘higher’ buildings in sub-clause (d). We would note that this site is within the South Lowestoft/Kirkley Conservation Area and adjacent to the Royal Norfolk and Suffolk Yacht Club, which is Grade II* listed, as well as the War Memorial (grade II) and statue of Triton (grade II). It is therefore a sensitive location in terms of the potential for future development, and we are concerned that support for taller buildings in this location is unjustified, given that it may impact on the character, appearance and setting of these heritage assets. Qualification should be added to this policy, and we suggest the following wording: <i>Proposals for buildings higher than the present pavilion may be supported where they i) demonstrate exceptional design quality; ii) can demonstrate that they would not have an adverse impact on the significance of the South Lowestoft/Kirkley Conservation Area, or the adjacent listed Royal Norfolk and Suffolk Yacht Club, Lowestoft War Memorial and Statue of Triton owing to development in their setting.</i>	Agreed – the suggested amendment will strengthen the policy by describing the constraints on taller buildings	Amend para d of LOW1 as suggested: ‘Proposals for buildings higher than the present pavilion may be supported where they i) demonstrate exceptional design quality; ii) can demonstrate that they would not have an adverse impact on the significance of the South Lowestoft/Kirkley Conservation Area, or the adjacent listed Royal Norfolk and Suffolk Yacht Club, Lowestoft War Memorial and Statue of

		Triton owing to development in their setting.'
LOW1 - Anglian Water supports the requirement for a high-quality public realm which should be underpinned by opportunities to incorporate sustainable drainage systems (SuDs) as part of multi-functional green infrastructure provision as the framework for the design. Natural England's Green Infrastructure Framework Map1 may help to provide useful information regarding the accessibility and opportunities for communities to access green and blue infrastructure and how local plans and neighbourhood plans can enable future provision and enhancements.	NDPs are not required to cover all aspects of land use planning. Flooding and SuDS is covered by Policy WLP8.24 of the Waveney Local Plan and does not need to be duplicated in the LNDP	No change required
<p>LOW1</p> <p>The building has been recently refurbished and there are no prospects or plans for a re-development. The plan should acknowledge this. This policy seems to be written in case re-development should happen at some point in the future. It should be made clear in the plan that there are no current prospects for re-development so that readers can understand the purpose of the policy and how it's likely to be applied. It shouldn't give the impression that development is likely to be taking place when this isn't accurate.</p> <p>The policy references the uses of the 'display' and 'exhibition' – what is terms.</p> <p>Criterion c) refers to the public realm, but the public realm is outside of the polygon shown in fig. 10. To address this you could either remove this reference or expand the polygon to include the public realm.</p> <p>Criterion d) – what does the plan consider to be a 'higher building' in this location? What is considered to be a normal height building in this area? This should be explained and justified so that designers and decision-makers know how to apply this part of the policy.</p> <p>The objectives of linking active frontages with the seafront and public realm; creating a distinctive landmark and strong identity; and high quality public realm are supported in general.</p>	<p>Agreed</p> <p>Agreed remove clause C</p> <p>Clause a) needs to refer to the building providing an active frontages'</p> <p>Agreed – see accepted amendment above</p>	<p>Add at the start of the second sentence in para 7.14 – 'Should the current building become vacant providing the opportunity for redevelopment the site could.....'</p> <p>Delete clause C)</p> <p>Amend clause a) to state – 'The building should provide an active frontages it overlooks surrounding public realm and seafront.'</p> <p>Amend as above</p>

<p>The neighbourhood plan should acknowledge that the existing building falls within a Conservation Area and also the setting of several listed buildings and structures, including the outstanding Grade II* listed Royal Norfolk and Suffolk Yacht Club.</p> <p>The Lowestoft Town Centre Masterplan describes this part of Royal Plain as being a gateway point to the seafront and link to the town centre. This would be a useful reference to add to this section.</p>		
<p>LOW2</p>		
<p>7.18: Opportunities for people to enjoy the water should be provided such a small motor boat hire and pontoons/marina provisions for privately owned pleasure vessels. In the Brooks Peninsula area viewing areas with binoculars could be provided so people can enjoy the nature and wildlife across the river that live in Leathes' Ham and the surrounding green area. There is a small beach area opposite Leathes' Ham on the north side of the lake which could be developed to encourage further wildlife to the area and providing an attractive view for the public access to waterfronts on the South Side.</p>	<p>The provision of leisure and nature viewing opportunities are not within the scope of the LNDP.</p>	<p>No change required</p>
<p>LOW2 - We note that the Waveney Local Plan site allocation for the waterfront site focuses on employment development in this area of the overall site allocation WLP 2.4; as it considered to be less sustainable for residential given the risk of flooding – with an element of residential proposed on the Jeld Wen playing fields. The policy also supports the enhancement of ecological networks and the County Wildlife Site. The Development Brief Supplementary Planning Document (2013) also provides further detail for the redevelopment of the site within the neighbourhood plan area, particularly in terms of addressing and mitigating flood risk and ensuring new buildings are designed to be energy and water efficient. However, there may be areas of the SPD that the neighbourhood plan could bring up to date</p>	<p>Noted</p>	<p>No change required</p>
<p>LOW2 - Whilst we would encourage a policy that promotes green infrastructure-led design on this site to incorporate SuDS and opportunities to enhance biodiversity including the Jeld Wen Mosaic</p>	<p>NDPs are not required to cover all aspects of land use planning. Flooding and SuDS is covered by</p>	<p>No change required</p>

<p>county wildlife site – the neighbourhood plan should be clear on the policy areas where it can exert most influence given that there is already extensive policy for development in this area.</p>	<p>Policy WLP8.24 of the Waveney Local Plan and does not need to be duplicated in the LNDP</p>	
<p>LOW2 - Redevelopment should take account of our existing infrastructure assets on this site. Maps detailing the location of our water and water recycling infrastructure and assets (including both underground assets and above ground assets such as pumping stations, water treatment works and water recycling works) are available on request from digdat Utilities. The site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing water mains/sewer(s) should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water’s existing assets may be required.</p>	<p>Noted – its not clear what change is being suggested to LOW2. The considerations outlined apply to all development not just the development of this site.</p>	<p>No change required</p>
<p>LOW2 - reservations over housing beside Kale Lothing - possible flooding from Kirklet Stream or Oulton Broad - overload on East Point Academy - Doctor's surgery? - Shops, Post Office etc.</p>	<p>The Development Brief proposes that residential development of the site within the Plan area should be set back from Lake Lothing behind employment uses. Provision will be made through CIL for improvements to infrastructure. A new infrastructure policy is proposed in the LNDP</p>	<p>No change required</p>
<p>LOW2 We are pleased to see this policy support the delivery of the Sustainable Urban Neighbourhood and Kirkley Waterfront Development Brief Supplementary Planning Document. This section lacks reference to the local plan allocation WLP2.4. It should be made very clear for readers that the WLP2.4 site allocation extends beyond the Lowestoft Neighbourhood Area and that this policy will apply only to the part of the allocation which falls within the Lowestoft neighbourhood area. The desire for public access to the waterfront is understandable and is a great principle. However, the Kirkley Waterfront SPD referenced above</p>	<p>Reference to WLP2.4 is made in para 7.5 and in Figure 9 which shows the full extent of the site. Amend para 7.18 to clarify further.</p>	<p>Change sites to site in para 7.18. Change para 7.18 to read ‘This policy sets a high level of expectation for the development of that part of the Kirkley Waterfront site within the LNDP area; particularly the waterfront edge....’</p>

<p>sets out that the waterfront that falls in the Parish of Lowestoft should be used for employment uses and allowing public access to quayside employment areas might create problems where the public and the employment operators mix. It is recommended that this policy is revised to add more flexibility around some of the criteria in part 2 of the policy. For example:</p> <p><i>2. Development should comply with the following development principles:</i></p> <p><i>a) There should be public access to the waterfront edge, provided through a combination of walkways, cycle ways, public spaces and high-quality landscape design where feasible;</i></p> <p><i>b) Spaces should be designed to encourage public and visitor use of the waterfront where feasible;</i></p> <p><i>c) The layout should prioritise pedestrian access to the waterfront edge where feasible and include clear sight-lines through the development;</i></p> <p><i>d) The waterfront (where accessible to the public) and streets and spaces should be overlooked by active frontages;</i></p> <p>Criterion 2e – what does the plan consider to be a ‘higher building’ in this location? What is considered to be a normal height building in this area? This should be explained and justified so that designers and decision-makers know how to apply this part of the policy.</p> <p>Public access to the waterfront areas can be provided on the development, but it is going to be more easily achieved on the parts of the site which are outside of the Lowestoft neighbourhood area. The plan should acknowledge and explain this so that readers can understand.</p> <p>Bullet point 3 refers to policy LOW6, whereas it should probably refer to policy LOW7.</p> <p>The neighbourhood plan expressly supports economic growth in its vision and aims and the need for more employment opportunities comes through very strongly in the consultation results. Para. 6.2 states that the key challenges for the town are improving viability and attracting employment and economic growth. This policy should therefore support these aims and outcomes by supporting employment use in this important part of the quayside.</p>	<p>The policy already provides sufficient flexibility – e.g. it states ‘should’ not ‘must’</p> <p>Check what design brief and local plan says – may require some explanation in the text - couldn’t see anything in the SPG about height of buildings</p> <p>Agreed – should be LOW7</p> <p>The Plan does support employment uses and the proposals in the SPD.</p>	<p>No change required.</p> <p>Amend reference to LOW7</p> <p>No change required</p>
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LOW3		
<p>8 Revitalising the TC This section should reference the Town Centre Masterplan; London Road Lowestoft High Street Heritage Action Zone; South Lowestoft HAZ and Seafront Masterplan; The Scores and Triangle Feasibility Study; The Powerpark Design Vision; and the North Lowestoft Heritage Action Zone Design Guide. Including reference to these in the policies would give them material weight in decision making. If there are specific elements of these which you think should be particularly followed then these can be specifically referenced.</p>	Accepted – some of these documents are referenced in para 3.10 and the missing ones will be added to this para.	Add missing documents to para 3.10
<p>Para 8.1 This could also include re-purposing the town centre.</p>	Not sure what ‘repurposing’ means in this context?	No change required
<p>Para 8.3 This states that changes to the Use Classes Order and permitted development rights potentially make the town centre less diverse. In what way do they do this? This should be explained for readers.</p>	Agreed – delete para	Delete para 8.3
<p>Para 8.6 This states that ‘...Lowestoft’s economy been traditionally based on the fishing and manufacturing industries in recent years...’ Insert ‘has’ between ‘economy’ and ‘been’. It would also be worth amending the paragraph to add that fishing and manufacturing have both declined significantly in recent years, as is stated in Waveney Local Plan, page 13, paragraph 1, sentence 2. As mentioned in the previous comments of September 2022, it may be worth inserting a timeline to give the reader a sense of how the town has changed over time.</p>	Agreed Traditionally and recent are a bit contradictory	Insert ‘has’ between economy and been Reword para ‘The Local Plan notes that the traditional industries of fishing and manufacturing have declined over recent decades but there is potential to replace these with jobs growth in offshore renewables and industries related to the Port of Lowestoft.’

<p>8.10: The town centre needs to be modelled off Riverside in Norwich. People shop online or travel to one of several retail parks in the town to do their general shopping. This is good as it keeps high volumes of traffic away from the town centre. The town centre should focus on niche, local and speciality businesses as well as a leisure, food and entertainment provision that people enjoy as a day out and not just as the weekly shop. Keep the weekly shop and mainstream shops to retail parks where parking and road infrastructure better allows for the increased traffic and promote public transport and a longer more relaxed days out in the Town Centre. This will turn the Town Centre into a tourist destination and not a dwindling shopping centre.</p>	<p>Comments noted – the Plan contains no policies related to out of town shopping</p>	<p>No change required</p>
<p>8.13 This refers to the Heritage Action Zone but it does not specify which one. The Town Investment Plan includes plans for extensive public realm development and improvement to the town centre and seafront areas. This should be referenced in this section.</p>	<p>Agreed to make it clear on which Heritage Action is mentioned here Agreed that Town Investment Plan should be referred to</p>	<p>Add “North” to 8.13 See new policy above re infrastructure</p>
<p>8.15: Inclusion of nightlife, including late opening bars and clubs for a diverse town centre which could aid in creating a “24 hour town centre” and draw younger people to the area. This needs to be complemented with high quality, modern and uniquely designed outdoor lighting and greenery designs.</p>	<p>Policy LOW3 allows for these uses. Lighting etc not within scope of LNDP</p>	<p>No change needed</p>
<p>Paragraph 8.14 - we are pleased to note the support for conversion of upper floors and the principle of ‘repopulation’ in the town centres. Evidence from research undertaken in places such as Boston, Lincolnshire, suggests that such conversions can often yield up to 10% return on investment, whilst supporting local economic and social vitality.</p>	<p>Support welcome</p>	<p>No change needed</p>

<p>Figure 12 - page 28: we suggest that the key is incorporated, and that the map makes clear which highlighted area is the Town Centre, and which is the Historic High Street, and - although it is highlighted in the policy below - what the area in blue represents.</p>	<p>Agreed</p>	<p>Add key to Figure 12</p>
<p>Policy LOW 3 - we welcome the principle of this policy and support its goal of ensuring that Lowestoft Town Centre (as defined) thrives. We note that sub-clause 7 may seek to restrict the Class MA Permitted Development right. Whilst we support the general principle of encouraging commercial development in this area, this restriction may go beyond the capacity of a neighbourhood plan to determine. We suggest that this policy is supported by engagement with East Suffolk Council to see whether it might introduce an Article 4 Direction that removes this Permitted Development right within this targeted area. We would note, however, that similar attempts by London Boroughs have been rejected by government.</p>	<p>‘Development consisting of a change of use of a buildingfrom a use falling within Class E.... (business etc).... to Class C3 dwellings ‘ is permitted development</p>	<p>Choice remove 7 or seek Article 4 Direction</p>
<p>LOW3 - Anglian Water would welcome policy support for retrofitting SuDS as part of any regeneration proposals within the town centre in relation to public realm, particularly where this encourages partnership working and investment opportunities.</p>	<p>NDPs are not required to cover all aspects of land use planning. Flooding and SuDS is covered by Policy WLP8.24 of the Waveney Local Plan and does not need to be duplicated in the LNDP</p>	<p>No change required</p>
<p>LOW3 Overall, the policy still is focused on north Lowestoft (Peto Square, London Road North, High Street). There is no mention of south Lowestoft (London Road South, Kirkley, South Beach). Policies relating to south Lowestoft would also create a more balanced vision for the town. This comment was also made in the previous comments East Suffolk made to Lowestoft Town Council The legend is missing from fig. 12. The red outline for the town centre in the north of the town is very large. How has this area been selected? It takes in areas to the north in excess of that identified by policy WLP8.18 such as Whapload Road - is there</p>	<p>Agreed</p> <p>Agreed – add policy for the South Lowestoft/Kirkley shopping area.</p> <p>Agreed – add legend to figure 12.</p>	<p>Add key to Fig 12</p> <p>Add new policy</p> <p>Add legend to figure 12</p> <p>No change needed</p>

<p>something specific you wish to achieve in this area? Whilst this area has a role to play for employment purposes it is questionable if it constitutes part of the town centre. There is the potential for two separate town centre boundaries to cause confusion.</p> <p>Given the generously drawn town centre area of this part of Lowestoft it would seem relevant and proportionate to also give the Kirkley shopping area similar consideration. This would make a valuable addition to the plan.</p> <p>Bullet 2 – this takes a stricter stance to protecting listed buildings and buildings in a Conservation Area than that set out in para.s 200 – 204 of the NPPF. A basic condition for a neighbourhood plan is that it must have regard to national planning policy and planning guidance. It is recommended that the plan explains and justifies the approach taken in this part of the policy with reference to national policy.</p> <p>Bullet 4 - the North Lowestoft HAZ Design Guide provides some guidance about building heights and this could be a valuable reference or piece of supporting evidence for this policy. Careful consideration is needed because Lowestoft does not generally have high rise buildings, especially not in this part of the town. As a result, there is the potential for adverse impact on the townscape.</p> <p>Bullet 7 – Refers to town centre uses, including use classes E and F1. It would be worth defining what other uses are classed as town centre uses.</p>	<p>The Town Centre follows the combined boundaries of WLP8.18 – Town Centre- and WLP 2.9 – Historic High Street. The criteria in Policy LOW3 are relevant to these areas.</p> <p>Paras 199 – 203 apply. Amend wording to reflect this guidance.</p> <p>Refer to the NL HAZ in the text</p>	<p>Amend LOW3 (2) to state: ‘Redevelopment of buildings will normally be supported. Planning applications leading to the loss of or harm to listed buildings will normally be refused and the loss of or harm to non-designated heritage assets in the Conservation Area will be refused if the proposal has an unacceptable effect on the architectural, historic or visual interest of the area’</p> <p>Additional wording added</p>
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<p>The Town Centre Masterplan should be referenced. This details zones in the town centre which will be of relevance here. Bullet 3 potentially works against the Town Centre Masterplan which identifies zones which would be best suited to residential development. We would support the Town Centre Masterplan recommendations being incorporated into this policy.</p>	<p>No clear conflict with the Masterplan identified</p>	<p>No change required</p>
<p>LOW 3 SCC welcomes Policy LOW3, particularly part 7 which protects use classes (including F1) and thus the Lowestoft Library. Lowestoft Library is perfectly placed to play a pivotal role in the rejuvenation of the High Street and revitalising the town centre - both in terms of its central geographical position and its ability to bring the community together under one roof. SCC recognises that the building is ageing and would benefit from modernisation that enables the space to become more flexible. The East Suffolk Infrastructure Funding Statement⁷ indicates that improvements to the capacity of Lowestoft Library are desirable and that financial contributions would be sought via CIL from developers.</p>	<p>Support welcome</p>	<p>No change required</p>
<p>LOW4</p>		
<p>LOW4: Good to see plans to put the Town Hall back into use and especially the intention to include an art gallery. Parking space will be a critical requirement if the project is to succeed.</p>	<p>Support welcome</p>	<p>No change required</p>
<p>LOW4 A large portion of this site allocation within the red outline is owned by East Suffolk Council. East Suffolk Council request that further detail is provided on the envisaged use of this land or that this portion of land is removed from the allocation. Lowestoft Town Council was previously advised in relation to this neighbourhood that East Suffolk Council is not supportive of restricting land in their ownership to car parking. Any site allocation in the neighbourhood plan should be deliverable. If there is no prospect of the allocated land coming forward as set out in the plan then the policy is not deliverable and should be re-considered. Bullet 1 – what is meant by ‘enterprise space’? This should be clarified. Bullet 2 - should state that conversion of the Town Hall will preserve its</p>	<p>Consider how 3 and 4 work together</p> <p>What does servicing mean?</p> <p>4 does not require the adjacent site to be used just for parking</p> <p>Previously ESC said adjacent site should be identified in the policy</p>	<p>Organise meeting with ESC</p>

<p>appearance and character as well as its special interest.</p> <p>Bullet 3 – this refers to land adjacent to the town hall being used for parking, servicing and other uses connected to the building. Is this adjacent land restricted to the land in the red outline or is the policy referring to other land too? This should be made clear in the policy. If it applies to all land in the red outline then the Town Council should establish agreement with the landowners involved. This should consider other forms of development to the site, in line with LOW15.</p> <p>Bullet 4 – as pointed out above, land to the west of the Town Hall is not in the Town Council’s ownership. Requiring this land to serve the needs of the Town Hall site without the agreement of the landowner will make this policy undeliverable. This part of the policy therefore needs re-writing to remove this undeliverable requirement.</p> <p>Further commentary around the findings of the public consultation would be interesting/helpful.</p>	<p>Need to separate planning comments from land owner comments</p> <p>Policies in a NDP do not need to be related just to land owned by the responsible body</p> <p>Bullet point 2 comment – agreed</p>	
<p>we support this policy, and consider that such considerations as it sets out are important for the ongoing and sustainable regeneration of Lowestoft Town Hall, which is a key hoped for outcome to be facilitated by the North Lowestoft Heritage Action Zone. A minor suggested wording change is: 2. <i>Conversion works for the Town Hall should conserve and/or better reveal the significance of the Listed Building, and conserve and enhance the character and appearance of the North Lowestoft Conservation Area.</i></p>	<p>Agreed</p>	<p>Amend clause 2 to state: ‘Conversion works for the Town Hall should conserve and/or better reveal the significance of the Listed Building, and conserve and enhance the character and appearance of the North Lowestoft Conservation Area.’</p>
<p>LOW4 - The change of use of land should reflect opportunities for green infrastructure (including SuDS) to minimise surface water run-off, with proposed areas of hard surfacing encouraged to consider permeable materials.</p>	<p>NDPs are not required to cover all aspects of land use planning. Flooding and SuDS is covered by Policy WLP8.24 of the Waveney Local Plan and does not need to be duplicated in the LNDP</p>	<p>No change required</p>
<p>When our new out of town "town hall" was built I was under the impression all council offices would be under the same roof and the</p>	<p>Comments noted</p>	<p>No change required</p>

existing town hall would be sold. Now after several years it is planned to use it again - what a waste of money. All the old furniture was left outside in the rain, I expect thousands will be spent for no good reason		
8.17 This makes a vague reference to heritage policies but without saying what they are. This should be clarified.	Agreed	Amend final sentence of 8.17 to read – ‘.....subject to heritage policies in national and local planning policy including LOW11’
8.19 A link should be provided to the Lowestoft Town Hall Business Plan.	Agreed	Add the THBP to para 3.10 and provide link.
LOW5		
<p>9.7 <i>The Local Plan notes “Life expectancy is lower in some of the central wards of Lowestoft than the rest of the [former Waveney] District, and death rates are higher”, which may imply that the housing stock has some influence.</i> Parts of the Harbour and Normanston Ward are amongst the 10% most deprived neighbourhoods in the country.</p> <p>https://dclgapps.communities.gov.uk/imd/iod_index.html This level of deprivation contributes to higher levels of crime and mental health issues. Problems in this area could be ameliorated by:</p> <ul style="list-style-type: none"> Funding internal or external home insulation Funding efficient heating systems Greening the streets by planting trees/green walls - reduces pollution, improves biodiversity and mental health. <p>https://www.treesforcities.org/stories/the-importance-of-urban-green-spaces-on-our-mental-health</p> <p>Creating pocket parks, incorporating sensory gardens for disabled people to enjoy - https://www.oss.org.uk/new-funding-initiative-to-create-pocket-parks/?gclid=CjwKCAiAu5agBhBzEiwAdiR5tJHkvg5Z3IcHNidQHKUqLBpKC7JqqpwU1oEOvS676nmI3ZQEhBEotBoC7VMQAvD_BwE</p> <ul style="list-style-type: none"> Traffic calming Encouraging residents/landlords to paint the street facing external walls of 	Some of these suggestions are covered by policies in the Plan LOW8, the proposed new infrastructure policy and some are not relevant to the LNDP	No change required

<p>terraces in bright/pastel colours to create a feelgood factor, see below Gloucester. https://www.visitgloucester.co.uk/things-to-do/the-rainbow-street-p2933113</p> <p>Strategically placing community benches in residential areas, as in many European cities, to promote a sense of community. Building community with the Benches Collective</p>		
<p><i>Adaptable Homes and an Ageing Population</i></p> <p>SCC welcomes the population data referred to in paragraph 3.9, however, SCC recommends looking at Suffolk Observatory² which provides a more up-to-date mid-2020 estimate population of 49,4533. The data also shows that 24.3% of the residents are aged 65+, which is above the England average of 18.5%, this highlights ageing population as a local issue. Thus, SCC recommends considering the needs of residents who are living with dementia in the community, and the potential for making Lowestoft a “Dementia-Friendly” town. The Royal Town Planning Institute has guidance on Town Planning and Dementia⁴, which may help inform resultant policies.</p> <p>Regarding Policy LOW4 and paragraphs 8.19 and 8.20, SCC would suggest that the plans to redevelop the Town Hall be preceded by consultation with local stakeholders (e.g., local charities, community groups, etc.,) to fully understand the needs and wants of those who may use the facility as a community hub.</p> <p>of an ageing population without excluding the needs of younger families. SCC welcomes Policy LOW8. SCC recommend adding to part 5 of the Policy to account for positioning and natural surveillance. This can work towards creating a safe neighbourhood, minimising the risk of crime and/or other forms of antisocial behaviour. The following wording is proposed:</p> <p>“5. Development should prioritise the amenities, safety, and convenience of pedestrians <i>and cyclists over vehicle users</i>, providing ease of movement within a site and connections to surrounding pathways and facilities.</p> <p><i>Developments should position open spaces, footpaths, and access roads in</i></p>	<p>Covered elsewhere – not within scope of LNDP</p>	<p>No change required</p>

<p><i>such a way that maximises the sense of cohesion within the development and creates natural surveillance.”</i></p>		
<p>LOW5 Typo: ‘...supported and in...’</p> <p>Criterion b – there may be some shops and commercial uses where locating residential properties above them would not be appropriate. This is mentioned in 9.15 but does not seem to make it into the policy. This criterion could incorporate an exception where residential uses would be incompatible with the commercial use.</p> <p>There are some parts of Lowestoft where conversions of buildings to flats or houses in multiple occupation will not be permitted by local plan policy WLP8.4. Criterion d) of this policy could be read to support this type of re-development. It is recommended that this policy is modified so that it does not support creation of flats or houses in multiple occupation in the identified areas.</p>	<p>Agreed</p> <p>Agreed</p> <p>Agreed</p>	<p>Delete ‘and’ between ‘supported’ and ‘in’ in LOW5 first sentence. Add at the end of clause b) – where there is mutual compatibility between uses.</p> <p>Add at the end of Clause d) and there is no conflict with policies restricting houses in multiple occupation.</p>
<p>Hope you are going to put/build social housing flats on seafront area or south of bridge for low income people who cannot afford or are forced out by larger homes. We need local people to stay here not forced out!</p>	<p>Noted – LOW2 is the only policy in the plan proposing residential development.</p>	<p>No change needed</p>
<p>LOW6</p>		
<p>9.8: With the provision of GP and dental services extremely limited, consideration could be given to reopen Lowestoft Hospital as a combined GP/Dentist/Minor Injuries Unit combined with a community hub/centre for individuals struggling with homelessness, mental health, alcohol/drugs and other community based problems and as a general community hub. This would give a one stop provision in the heart of Lowestoft and in an area which is classified as deprived and experiencing lower life expectancy. This could be NHS operated, council operated, operated by a charity (Access Community Trust to think of one example) or a partnership.</p>	<p>The NHS proposes to dispose of this site for residential use</p>	<p>No change needed</p>

Converting this area to housing may have a negative impact on the area and could only contribute further to deprivation in an already densely filled area with housing with several recent housing developments nearby.		
We note this policy, and are supportive of its general principles. We suggest that the sections of the hospital with sufficient architectural or historic interest could be identified by the plan as a non-designated heritage asset, if it is not already.	It is not considered necessary to identify the building as a non-designated heritage asset as LOW6 requires architectural or historic interest to be preserved or enhanced.	No change needed
LOW6 - We support the policy approach including the use of planting within the site to reinforce and enhance the existing planting and enable the use of SuDS, including rain gardens. We would also welcome encouragement to explore opportunities for rainwater/stormwater harvesting on the site.	Noted	No change needed
Policy LOW6 lists development principles that should be followed when developing the former Lowestoft Hospital site. There are numerous design frameworks that could be considered to ensure that residents have a healthy, green, biodiverse environment to live in. Healthy neighbourhoods, 20-minute neighbourhoods, Build with Nature and Natural England all have design frameworks to promote a healthier environment. The promotion of active travel and EV charging within residential developments and general access to EV charging should also be factored in to designs. The ICS would welcome comment of these within the plan to promote creation of healthy neighbourhoods. This would also support policy LOW7.	Residential mix and standards are covered in LOW7	No change needed
LOW6 The Town Council should ensure that the landowner has been adequately consulted with respect to this policy.	The landowner has been consulted	No change needed.
LOW7		
LOW7 - I do hope there will be good provision of affordable homes for first time buyers. I also really hope to see unused buildings repurposed,	Noted	No change needed

especially the old Hospital and areas like the upper levels of Wetherspoons.		
LOW7 - The policy calls for a mix of residential development. I believe anecdotally – I am sure the statistics could be confirmed by East Suffolk Council – that the vast majority of significant developments within the Lowestoft area have in recent years been almost entirely of affordable housing, mostly for rent. Whilst affordable housing is an important benefit to the community, it does not alone help to achieve the mix desired. Perhaps instead of an ‘affordable’ requirement in developments, they should be required to have a ‘private market’ proportion?	Support welcome	No change needed
LOW7 Has any evidence been gathered to support the implementation of the M4(3) and National Space Standards? East Suffolk Council would support the implementation of these standards but this should be clearly evidenced. If challenged in the examination they could be removed from the policy if not evidenced.	Noted – the policy states ‘such as’ and ‘or future equivalent standards’ and therefore is not setting an absolute requirement and is future proofed	No change needed
LOW7 SCC welcomes Policy LOW7, however, it could be further strengthened via the inclusion of examples or criteria of what is intended by the phrase “landscape features to reduce carbon impact and promote biodiversity” in part 5 (for example tree-lined streets, SuDS, green roofs, green walls, continuous open green spaces and hedges linking to other areas).	This is covered in LOW8	No change needed
LOW8		
We welcome Section 8 and the emphasis on high quality design set out in Policy LOW8. We suggest that sub-clause 6 could add reference to Historic England’s Streets for All, in relation to works to the highway and public realm in historic areas.	The Suffolk Design Streets Guide provides suitable local guidance	No change needed

<p>Listed Buildings</p> <p>Though there is mention of Listed buildings throughout the document, these are not discussed in any detail. The designated heritage assets form a significant part of the town’s visible heritage and as such SCC would advise, at a minimum, there should be the inclusion of a Figure showing the location of Listed buildings. The inclusion of a table of Listed buildings and buildings of Listable quality would enhance the document further. This would also add further detail to discussions on the town’s conservation areas.</p> <p>Given the above, SCC would encourage the addition of the following wording in Chapter 10, relating to archaeology in development sites: <i>“Suffolk County Council Archaeological Service manages the Historic Environment Record for the County and holds numerous records for the parish relating to historic settlement and other cultural activity. Non-designated archaeological heritage assets would be managed in development through the National Planning Policy Framework. Suffolk County Council Archaeological Service would advise that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of any future development sites at an appropriate moment in the design stage, in order that the requirements of the National Planning Policy Framework, and East Suffolk (Waveney) Local Plan are met. Suffolk County Council Archaeological Service, as advisors to East Suffolk Council would be happy, to advise on the level of archaeological assessment and appropriate stages to be undertaken.”</i></p> <p>Including this paragraph would add clarity to developers for any future sites. The Neighbourhood Plan could also highlight a level of outreach and public engagement that might be aspired from archaeology undertaken as part of a development project, as increased public understanding of heritage sites is an aspiration of the National Planning Policy Framework.</p>	<p>Listed buildings are described in various supporting documents covering conservation areas and heritage action zones.</p> <p>Heritage assets are dealt with in Policies WLP8.37 and 38 of the Waveney Local Plan.</p> <p>Archaeology is covered in Policy WLP8.40 of the Waveney Local Plan.</p>	<p>No change required</p>
<p>10.11</p> <p>This paragraph references the Waveney Strategic Play Evaluation Action Plan. This paragraph makes the assertion that Lowestoft scored worse across the board for the provision of play space quality for toddlers, juniors</p>	<p>Agreed</p>	<p>Amend para 10.11 to read - ...found that Lowestoft had medium levels of quality</p>

and teens than elsewhere in Waveney (except Halesworth and Holton). However, the overall scores for Lowestoft appeared to be higher than other settlements (besides Halesworth and Holton) and so this assertion needs to be checked.		for its play areas. Whilst....'
10.12 I could not find reference to the 12 Pocket Parks in the Scores and Triangle Market Feasibility Study.	There are a number of references to pocket parks – but not 12 - and to gardens.	Amend the third sentence of para 10.12 to read '... identified a number of opportunities for pocket parks and gardens that could....'
10.13 This should state the source for the figures in the first sentence.	Agreed	Add at the end of the first sentence of para 12.13 ...people (Open Space Needs Assessment WDC July 2015).
10.21 This states '... so that the public realm is not dominated.' It is assumed that it means dominated by parking, but this needs to be made explicit. It would also be worth the text referring to the Suffolk Parking Standards.	The sentence is clear	No change needed
10.24 The plan could usefully reference East Suffolk's Sustainable Construction SPD here: https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Sustainable-Construction-2022/FINAL-Sustainable-Construction-SPD.pdf	Agreed	Add to para 3.10.
LOW8 The general approach to design taken by this policy is good and is supported. Guidance or explanation of what is considered to be locally distinctive would be very helpful. One element of design that has been receiving some attention recently is		

<p>the design of parking. While the policy does address this, there could be opportunities to strengthen this to ensure parking is designed in a way that promotes its integration into development and the natural environment further. For example, encouraging planting in car parking areas could help reduce their impact.</p> <p>5 – The highway hierarchy is important here. Reference could also be made to cycling and public transport with further reference to the East Suffolk Cycling and Walking Strategy.</p> <p>6. – are there any particular elements of the ‘Suffolk Design: Streets Guide’ that are supported by the plan? If so this could be highlighted or emphasized in the plan to give them greater emphasis (and material weight if included in the policy itself). This can also help protect against changes to external documents making the neighbourhood plan out of date.</p>		
<p>LOW8 - Anglian Water would welcome an addition to criterion 8 to include reference to multi functional green and blue infrastructure to deliver sustainable drainage schemes (SuDS)</p>	<p>A general reference to SuDs is considered sufficient</p>	<p>No change needed</p>
<p>LOW8 - Criterion 9 is supported. However, we consider the policy could go further by incorporating more ambitious water efficiency measures. The Government’s recently published Environmental Improvement Plan announces an intention to improve building regulations for water efficiency to 100 litres per person per day in water stressed areas. We would support a policy that seeks to achieve this efficiency measure using a ‘fixtures and fittings’ approach. In addition, the policy could encourage water reuse systems which provide an alternative non potable water supply for uses where drinking water quality is not required (e.g. flushing toilets and watering gardens). There are various types of water reuse systems including rainwater and surface water harvesting, and grey water recycling.</p>	<p>The general reference to incorporating superior environmental performance is considered sufficient</p>	<p>No change needed</p>
<p>LOW8 - Paragraph 10.21 - approaches to parking include hard standing - we would suggest that any redevelopment or introduction of hardstanding</p>	<p>Noted</p>	<p>No change needed</p>

<p>for parking should consider opportunities for permeability to reduce surface water run-off, and integration of SuDS.</p>		
<p>LOW8 - Paragraph 10.24 - positive design features to reduce carbon use include more ambitious water efficiency measures through water efficient fixtures and fittings. Using less water also means heating less water which saves carbon for households, but also for the supply of potable water and the subsequent treatment of wastewater. We support the reference to SuDS, rainwater capture, storage, and reuse in the list of positive design features. It should be noted that greywater is a separate water reuse arising from water used in the home i.e. from sinks and showers. Therefore, we suggest this bullet-point should be reworded as:</p> <ul style="list-style-type: none"> • rainwater/stormwater harvesting and greywater reuse. 	<p>This is generally covered in the list which is not intended to be comprehensive.</p>	<p>No change needed.</p>
<p>LOW8 SCC cautions that part 10 of Policy LOW8 could be interpreted in a way that could result in a negative outcome for green infrastructure and planting proposals. Therefore, the following text should be added: “Future maintenance requirements should be considered in the design, layout and spacing of properties, <i>but not to the detriment of providing ongoing green infrastructure and Biodiversity Net Gain</i>”.</p>	<p>Agreed</p>	<p>Add ‘but not to the detriment of providing ongoing green infrastructure and Biodiversity Net Gain’ to the end of clause 10</p>
<p>LOW8 SCC welcomes the encouragement of walking and cycling throughout the plan, and in particular the focus on pedestrian safety in Policy LOW8 part 5.</p>	<p>Support welcome</p>	<p>No change needed</p>
<p>LOW8 SCC notes that reference is made, in part 6 of the Policy, to ensuring the design of low vehicle speeds in accordance with the Suffolk Design Streets Guide. SCC welcomes the reference to Suffolk Design Streets Guide; however, SCC is concerned that the current approach discusses vehicles only and does not emphasise the need to prioritise and facilitate walking,</p>	<p>Agreed</p>	<p>Amend LOW8 clause 6 to read: ‘Street layouts should be designed for low vehicle speeds, prioritising pedestrians and cyclists in</p>

<p>cycling, and accessibility to public transportation, in line with Section 9 of the NPPF (2021).</p> <p>The Suffolk Design Streets Guide outlines that street layouts should prioritise pedestrians, including people using wheelchairs and mobility scooters, and cyclists over other modes of transport, and that new development should promote modal shift by anticipating the movement patterns of pedestrians and cyclists, including those using public transport, and provide the most desirable routes.</p> <p>SCC would therefore support an amendment to the Policy to further state the promotion of these sustainable modes of travel, as detailed below. Reference should be made to Suffolk Guidance for Parking 2019 within Policy LOW8, ensuring that any subsequent documents are also incorporated. Amending part 6 of the Policy with the following should be sufficient:</p> <p><i>“6. Street layouts should be designed for low vehicle speeds, prioritising pedestrians and cyclists in order to encourage sustainable travel, with varied provision of parking so that traffic and vehicles do not dominate the public realm, and in accordance with the Suffolk Design Streets Guide, Suffolk Guidance for Parking and any successor documents”.</i></p> <p>This amendment will ensure the Plan is compliant with local policies.</p>		<p>order to encourage sustainable travel, with varied provision of parking so that traffic and vehicles do not dominate the public realm, and in accordance with the Suffolk Design Streets Guide, Suffolk Guidance for Parking and any successor documents’.</p>
<p>LOW9</p>		
<p>10.25: One of the biggest and most used public spaces in the town is the road network. Opportunities should be taken to enhance the greenery on the verges and other space that borders the road network and buildings. The roads see a massive footfall so increasing greenery and making it a preferred option instead of walls or fences bordering roads will make them more attractive and promote safer and more considerate driving. Key areas to focus on would be the centre of roundabouts, replacement of brick walls along Katwijk Way and Jubilee Way with greenery and seeking opportunities to improve greenery along other roads and footpaths.</p>	<p>Noted – this is not within the scope of the LNDP</p>	<p>Pass comments to Suffolk Highways</p>
<p>We are pleased to see that the Lowestoft Neighbourhood Plan recognises the importance of biodiversity and proposes measures to protect and</p>	<p>Policy LOW9 seeks to ensure that any impact on biodiversity is mitigated and that new</p>	<p>Add to Para 10.25 – ‘The Government provides</p>

<p>enhance it within Policies LOW9 and LOW13. We recommend expanding Policy LOW9 to ensure greater protected for biodiversity. The policy should reference safeguarding Priority habitats, protected species and Priority Species from future development. There are several Priority Habitats represented with Lowestoft including ponds, hedgerows and lowland meadow which should be highlighted within plan text and policies.</p>	<p>development should achieve biodiversity net gain. It does not focus just on Priority Habitats. However it would be useful to reference Priority Habitats in the text.</p>	<p>advice about Priority Habitats which should be taken into account in mitigating adverse effects on biodiversity and creating new habitats – see https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england.’ Suffolk County Council’s Nature Strategy also provides guidance - https://www.suffolk.gov.uk/asset-library/imported/suffolks-nature-strategy-2015.pdf</p>
<p>The NPPF (2021) (Section 179) identifies that plans should ‘Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them’ and ‘promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.’ Considering the emphasis within the NPPF to map and safeguard wider ecological networks, we recommend highlighting the Strategic Green Landscape within Policy LOW9 as an important ecological network where Biodiversity Net Gain and enhancement from development could be targeted to help improve habitats for key species. Neighbourhood Plans are an excellent opportunity for local communities to determine where ecological networks should be established and what measures are needed to implement them.</p>	<p>Would LTC commit to mapping corridors/sites etc in a separate plan?</p>	

<p>Additional ecological networks/green corridors exist within Lowestoft which could be highlighted within the plan text or policies. For example, the Bonds Meadow County Wildlife Site (CWS) and Hall Road Ham CWS link to form an ecological network which also connects to high value habitats in the parish of Oulton through urban gardens and woodland which stretch west along the railway line. Another example is the network of habitats such as wildflower rich verges, hedgerows, and ponds along Peto and Millennium which links Leathes Ham CWS and Normanston Park in the south with habitats to the north of Lowestoft. Some parishes, such as Oulton, have included green corridor maps within their Neighbourhood Plans and highlight the need to protect and enhance these areas for wildlife. A green corridor map would satisfy the requirement within the NPPF to map and safeguard ecological networks and could be referenced within Policy LOW9 to highlight areas where Biodiversity Net Gain and enhancement from development could be targeted</p>	<p>See above</p>	
<p>Considering the number and biodiversity value of CWSs within Lowestoft we recommend including a map within the Neighbourhood Plan which highlights these sites for developers. This will help to ensure that development which could have direct and/or indirect impacts to CWSs within Lowestoft consider these potential impacts from an early stage of development design in order to avoid impacts. This map and the need to avoid direct or indirect impacts to CWSs within Lowestoft should then be highlighted within Policy LOW9.</p>	<p>See above</p>	
<p>Additionally, considering the urban nature of Lowestoft and therefore the limited space available for habitat creation and expansion of ecological networks, opportunities for wildlife enhancement within proposed development should be maximised. Further detail of how this can be achieved should be highlighted within Policy LOW9 and/or the plan text. New development should incorporate as standard a mix of wildlife friendly garden design, native planting, bat and bird boxes, insect bricks and hedgehog highways.</p>	<p>The Plan requires developments to create biodiversity net gain. Other plans and strategies provide advice about how to achieve it.</p>	<p>No further changes – in addition to the amendments to para 10.25 above is required.</p>
<p>The new Environment Act 2021 requires development proposals to achieve a 10% net gain in biodiversity; whilst not yet required in law, this</p>	<p>The 10% will be required by November 2023 by law. The LNDP is unlikely to become part of the</p>	<p>Amend the third sentence of clause 1 to state</p>

<p>level is already being implemented as good practice across the country. The Wildlife Trusts, as well as other organisations, are advocating for 20% Biodiversity Net Gain (BNG) where this is possible and setting an aspiration for achieving a higher percentage of net gain could help to ensure that the biodiversity assets of Lowestoft are conserved and enhanced for future generations. Suffolk County Council’s recent commitment to ‘deliver a further 10% biodiversity net gain in aggregate across the housing programme, in addition to the 10% biodiversity net gain that will be required on each site.’, suggests that it is reasonable to include this aspiration within the Lowestoft Neighbourhood Plan. West Suffolk also consider a greater than 10% requirement for BNG in their recent preferred options consultation on their Local Plan.</p> <p>There are further examples of district councils outside of Suffolk requiring more ambitious BNG requirements within their Local Plans and these have been evidenced with viability studies. For example, Swale Borough Council completed a viability study and found that doubling the percentage of biodiversity net gain from 10% to 20% increased the cost of delivery by just 19%, so then included a minimum 20% BNG requirement in their local plan³. The Greater Cambridge Draft Local Plan also includes a requirement for a minimum 20% BNG⁴. Policy LOW9 could include a statement in support of development where 20% BNG can be demonstrated in Lowestoft. Delivering 20% BNG ensures there is more certainty that a significant and meaningful uplift in biodiversity will be achieved, which will help protect the high-quality biodiversity assets and ecological networks within Lowestoft.</p>	<p>Development Plan until after that date. Therefore, adding reference to ‘at least 10%’ at this stage seems reasonable</p>	<p>‘Development should achieve at least 10% biodiversity net gain....’</p>
<p>LOW9 - The Government intends to make 10% Biodiversity Net Gain (BNG) mandatory from November 2023. Anglian Water already makes a voluntary 10% BNG on all capital schemes and we consider there are multi-functional benefits in aligning schemes where improved outcomes can be made for the environment. There is potential for the neighbourhood plan to indicate priority areas for delivering off-site BNG in those circumstances where it cannot be achieved on</p>	<p>Does LTC want to commit to undertaking work to identify off site BNG?</p>	

<p>site. Whilst there is a further delay on the amount of BNG to be delivered on small sites, there is still an opportunity to benefit from identifying where BNG offsets could be delivered locally.</p> <p>We agree that development sites should be based on a masterplan where it is delivering significant development and that green infrastructure should be integral to the scheme to ensure multi-functional benefits can be achieved.</p>		
<p>LOW9</p> <p>The Council supports the protection of the natural environment and the encouragement to provide Biodiversity Net gain on new development. Criterion 2 provides support for a coordinated approach to the delivery of green infrastructure. The Council would encourage that this is expanded to support the provision of biodiversity and green infrastructure that is connected throughout development sites. Isolated ‘islands’ of habitats should not be encouraged as these do provide great benefits to wildlife. This criterion is unlikely to be effectively applied to small scale development such as householder development or small numbers of homes. It is suggested that this applies only to major development (e.g. 10 dwellings and over) or text is added to say: “as appropriate to their scale, nature and location, development sites should...”.</p> <p>Also, the Council would support greater encouragement for small scale natural environment improvements such as hedgehog highways, swift bricks and bird boxes. This is something that is encouraged in the National Design Code and would be supported by the Council.</p> <p>An outline of an expected masterplanning process is set out in Appendix 7 of East Suffolk Council’s Statement of Community Involvement (https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Statement-of-Community-Involvement/Statement-of-Community-Involvement.pdf). You might find it helpful to incorporate this to establish expectations from a masterplanning process.</p> <p>Criterion 4 – protecting all ponds from any development seems heavy handed. A small domestic pond in a residential garden may have minor</p>	<p>Biodiversity plan?</p> <p>Agreed</p> <p>Agreed</p> <p>Agreed</p>	<p>Add “As appropriate to their scale, nature and location, development sites should...” at the beginning of clause 2.</p> <p>Add a reference to the masterplanning guidance to para 10.25 afterunsustainable development’.</p> <p>Amend clause 4 to say – ‘Ponds, outside of the</p>

<p>biodiversity value and absolute protection for it seems disproportionate. I would suggest a more proportionate approach is taken with this criterion if it is to be included in the policy.</p> <p>The plan could support or require details of management strategies of urban space/green infrastructure to help ensure their long term stewardship.</p>		<p>curtilage of existing homes, should be...'</p>
<p>LOW9 - We suggest that Criterion 3 of Policy LOW9 should include the provision of SuDS. To ensure that this list is not limited to these specific areas, we recommend that the words 'and to' preceding a) b) and c) is replaced with 'including': <i>3. Urban green space should be designed to provide an attractive setting for development including and to: a) provide opportunities for social interaction and recreation; b) include retention of existing trees and landscape features and new tree planting using native species; c) incorporate layouts with active frontages to paths and green space and avoid flanking it with rear boundaries and high fencing; and d) incorporate multi-functional green infrastructure such as sustainable drainage systems (SuDS).</i></p>	<p>Agreed</p>	<p>Add a new clause d) to LOW9: 'incorporate multi-functional green infrastructure such as sustainable drainage systems (SuDS).'</p>
<p>LOW9</p> <p>SCC welcomes Policy LOW9 part 3, detailing the desire for multifunctional use of urban green spaces including social interaction and recreation. Evidence shows the benefits of open realms, improving physical health and improvements to mental wellbeing for the population as a whole. This includes better quality of life for the elderly, working age adults, and for children, through physical activity and increased opportunities for social engagement. Open spaces should be accessible, sustainable, and encourage active travel.</p> <p>Regarding green space inclusions within new developments, SCC suggests green spaces should be made attractive in design, be inviting, and feel safe, with facilities accessible to residents with limited mobility via the inclusion of shelter, benches (including Chatty Benches), and providing well-maintained paths with good lighting. This could help to make the</p>	<p>Agreed</p>	<p>Add to new sentence at the end of para 10.27:</p> <p>'Green spaces should be made attractive in design, be inviting, and feel safe, with where appropriate facilities accessible to residents with limited mobility such as shelters and benches, well-maintained paths with good lighting.'</p>

elderly population feel more included as part of the community, reduce the isolation of vulnerable groups and support their wellbeing.		
<p>LOW9</p> <p>SCC suggests two minor amendments to Policy LOW9 could be made to strengthen its interpretation in respect of biodiversity, please see the suggested amendment below:</p> <p>“1. Development should <i>provide a measurable increase in</i> have no overall significant adverse impact on biodiversity Any identified adverse impacts should be mitigated, including with positive building design and landscape features to enhance developments for wildlife. Development should achieve biodiversity net gain, which should be measured using the latest DEFRA biodiversity metric available at the time of submission of the proposal for planning permission. <i>Any identified adverse impacts that cannot be avoided or further minimised should be mitigated, including with positive building design and landscape features to enhance developments for wildlife.</i>”</p> <p>“4. Existing ponds <i>and their connectivity/pathways to adjacent habitats</i> should be protected from development.”</p> <p>These amendments would seek to mirror the Environment Act 2021 legislation and ensure existing ponds remain connected, which should further protect their continued ecological value.</p>	<p>These suggested changes do not seem to fit in the sections suggested</p> <p>Agreed</p>	<p>No change required</p> <p>Further amend clause 4 of LOW9 to state ‘Ponds, outside of the curtilage of existing homes, and the connections between them should be...’</p>
<p>LOW9</p> <p>Policy LOW9 refers to “key pedestrian paths”, however, SCC would suggest this is amended to read as “<i>public rights of way</i>” to also include bridleways, which can be used by cyclists, equestrians, and motorised mobility aid users</p>	Agreed	Change ‘key pedestrian paths’ in clause 2 to ‘public rights of way’.
LOW10		
<p>LOW10: Port - I have suggested to LTC and ESC a (very old) idea to plant eelgrass in Lake Lothing (very valuable marine habitat)</p>	Not within the scope of the LNDP	Pass comments to?
<p>LOW 10</p> <p>Figure 14 is incorrectly quoted, should be figure 16.</p>	Figure numbers are correct	No change required

<p>Are there any further examples of improvements or environmental impacts that could be added? The policy wording is vague and this would help designers and decision-makers effectively apply the policy.</p> <p>This policy covers the northern shore of Lake Lothing, as well as the outer harbour. As such it covers the same land as several Local Plan allocations: WLP2.10 (Inner Harbour Port Area), WLP2.3 (Peto Square), WLP8.18 (New Town Centre Use Development) and WLP2.2 (Power Park). These policies should be referenced.</p> <p>The Town Council should ensure that the Association of British Ports and any other landowners whose land is covered by the red outline have been adequately consulted.</p>	<p>Policy provides correct level of guidance</p> <p>ABP were consultees</p>	<p>No change required.</p> <p>No change required</p>
<p>10.15: Any port developments should include modern, up to date and relevant signage and viewing areas so people can see what is happening. Modern and aesthetically pleasing fencing should be used so lessen the industrial feel the port can have on the surrounding area and to allow it to blend into a modern designed town.</p>	<p>Unnecessary level of detail</p>	<p>No change required</p>
<p>10.28: Strongly agree with this point. Many options for aesthetically appealing/modern looking boundary fences, integrating viewing areas and increasing the amount of greenery and landscaping on the border of the Port with the town.</p>	<p>Support welcome</p>	<p>No changes needed</p>
<p>we suggest that this policy includes a recommendation for any future redevelopment of the riverside on the north to follow similar principles as are set out for the site to the south.</p>	<p>The Plan makes no proposals for this area so it is not appropriate to include this requirement</p>	<p>No change required</p>
<p>LOW10 SCC seeks clarity on what is meant by “environmental impacts”, as this is a broad term. It is further suggested that the Neighbourhood Plan Steering Group clarify what will mitigate environmental impacts, such as noise. Policy LOW17 is a good example of this, including noise, pollution, and vibrations.</p>	<p>Fair comment....</p>	<p>Change??</p>
<p>LOW11</p>		

<p>We provisionally welcome Policy LOW11 and consider that providing some additional clarity over the general policy found at District level may be justified but have a few comments. We note that the key characteristics do not uniformly apply across the conservation area. For example, we note that rear of footway frontages are generally found only along the High Street and its immediate surrounding area. Gunton Cliff and areas north of Belle Vue park, as well as some of the historic industrial areas along Whapload Road do not exhibit this characteristic. On bullet 4, is “contracts” the intended word? We support Clause 2 but suggest rewording to include the following additional point: <i>“Development should not encroach onto the ‘The Scores’ footpaths or harm their character, accessibility or amenity. Proposals that would enhance their character through the repair or reinstatement of traditional surface or wall materials will be supported.</i></p>		
<p>LOW 11 There is a very large amount of Conservation Area in the southern part of the town featuring exceptional architecture. Why is there no mention of this? Why is a similar policy approach avoided for the south of Lowestoft? The overlooking of the southern part of the town is very difficult to understand. Figure 15 is incorrectly quoted, should be figure 17. Figure 17 – The Conservation area should be drawn as per the boundary shown in the North Lowestoft Conservation Area Appraisal. East Suffolk Council’s Planning Policy and Delivery team can assist with this if required. The North Lowestoft Heritage Action Zone and Conservation Area Appraisal should be referenced. 1, bullet 4 - Should ‘Variations and contract’ be ‘variations and contrasts’? If not, it’s not clear what a ‘contract in form’ is.</p>	<p>Agreed – Policy for South Lowestoft and Kirkley CA to be added.</p> <p>Agreed – policy LOW11 should refer to figure 17.</p> <p>Agreed</p> <p>Agreed</p> <p>Agreed</p>	<p>Add new policy...</p> <p>Amend Policy LOW17 to refer to figure 17.</p> <p>Amend Figure 17 to reflect the NLCA Appraisal.</p> <p>See above</p> <p>Amend to read ‘variations and contrasts’</p>
<p>LOW12</p>		

<p>LOW13 or 12: WWII heritage on Gunton Warren is significant. Also some on nearby sites.</p>	<p>Noted</p>	<p>No change needed</p>
<p>10.32: Additionally work needs to be done to promote opportunities to access the sea and to understand the harbour. The South pier is the perfect platform to do this, with viewing platforms, information signs and modern shelters/street furniture. The Lowestoft Heritage Quay on South Pier is a vital asset but appears very under-looked in terms of its potential and promotion.</p>	<p>Noted – promotion etc is not within the scope of the LNDRP</p>	<p>No change needed</p>
<p>we support this policy but think it could go further to protect Lowestoft’s local heritage where it is not already identified elsewhere, such as East Suffolk Council’s local list. Is there a longer list of non-designated heritage assets that the neighbourhood plan wishes to specifically identify and protect? The South Pier is mentioned, but this appears to be the only other one. If this is an asset that should be protected in addition to the those on the Local Planning Authority’s ‘local list’, then we would strongly recommend that its historic and architectural interest is set out in more detail to justify the policy. Please see our Advice Note 7: Local Heritage Listing <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/> for more information on how this might be presented. Information such as this can be put into an appendix, and we can provide examples if this would be helpful.</p>	<p>? Is there a list of NDHA’s?</p>	
<p>LOW12 Designated Heritage Assets? We would encourage you to do so. The Waveney Local Plan at Appendix 6 contains criteria that can be used to identify them. Bullet 1 - Below ground non-designated heritage would be better referred to as archaeology, so that it is consistent with the terminology of the Local Plan. The subject of protecting archaeological content may already be adequately covered by Local Plan policy WLP8.40 (Archaeology). Bullet 2 - It may be worth providing a bit of historic context and explaining why the pier is so important. The supporting text could capture this. There</p>	<p>Does this mean non? - see above</p>	

is also no mention of Claremont Pier, which is also a significant feature of the townscape (a point raised in comments in September 2022).		
LOW13		
LOW13: Dip Farm Golf Course should be part of this instead?	Dip Farm Golf Course – disused – is part of the Strategic Green Landscape	No change needed
LOW13: Very concerned at current poor management of Gunton Warren by SWT and lack of consultation (but ESC land)	Noted – not within scope of LNDP	Comment passed to?
LOW13: Some simple coordination of management of Gunton Warren with the Golf Course (see above) and North Denes useful.	Noted – not within scope of the LNDP	Comments passed to?
10.35: Work needs to be done to improve and regenerate Denes Oval, preserving the heritage of the site but also promoting new unique sports provisions, associations and clubs.	Noted – not within scope of the LNDP	Comments passed to?
10.35 This talks about the impact of development on “the area as a whole”. However the identified area is quite disjointed and some of the areas do not relate well to one another, therefore in many cases it would not be possible to experience the area as a whole and development could easily affect one part of the designation whilst having no impact at all on others. As such it does not seem appropriate to discuss impacts on the area as a single whole landscape. As much of the identified area is quite different in form and function it may work better to break it up into several smaller areas.	Agreed – the text should be amended to reflect the policy	Amend the first sentence of para 10.35 to read: This policy protects the only remaining substantial green area within the Town from development that would detract from its open and green character.’
LOW13 - Mostly though, our green spaces should be preserved and enhanced. As a world we are losing too much biodiversity. I hope Lowestoft can show how to start to preserve that and if it can create jobs, even better.	Support welcome	No change needed
LOW13 This policy covers a large area made up of smaller green spaces. The reasoning for allocating such a large area as a single ‘strategic green landscape’ should be clearly set out. As part of this reference should be made to ‘Supporting Document 3 – Protecting Open Landscapes, Sports	Agreed that some of the explanation and justification contained in the Supporting Document should be included in the Plan itself which should be referenced in the text.	Expand the justification for LOW 13 by adding text from Supporting Document 3.

<p>Fields and Local Green Spaces.’ Note that page 35 of Supporting Document 3 refers to the ‘Victorian ear’, whereas it should refer to the ‘Victorian era’. Substantial parts of this green space is protected as open space under Local Plan policy WLP8.23 which should be referenced.</p> <p>East Suffolk Council owns land within this allocation which has previously been used for leisure uses. The policy should allow for sensitively designed leisure or tourism development to take place that complements the character and openness of the landscape.</p>	<p>Agreed re ear and era!</p> <p>Agreed re WLP8.23</p> <p>It is important to separate comments made from a planning perspective with comments made in the interests of a landowner. The policy allows for development that supports the areas amenity, recreational and environmental value and enhances its open and green character</p>	<p>Change ‘ear’ to ‘era’</p> <p>Reference WLP8.23 in the supporting text</p> <p>No change required</p>
<p>We are pleased to see that Policy LOW13 provides greater protected for an area of Strategic Green Landscape, which includes several important wildlife sites including Gunton Warren CWS, Gunton Meadow CWS and Foxborough Wood CWS. We also recommend that Corton Woods CWS and the Corton Cliffs Site of Special Scientific Interest, which border the strategic green landscape to the north, are also included in the Strategic Green Landscape for completeness.</p>	<p>Support welcomed</p>	<p>No change required</p>
<p>We also recommend providing further detail within the plan text regarding the importance of these sites for wildlife, in order to provide guidance as to how proposed development should support its environmental value. There are several rare Priority habitats present within the north of Lowestoft, including deciduous woodland, lowland heathland, lowland meadow, coastal sand dunes and coastal vegetated shingle (see MAGIC (defra.gov.uk)). There is also an area of irreplaceable ancient woodland at Foxborough Wood CWS. This diverse mosaic of habitats is extremely special and provides homes to an array of rare and protected species, as well as providing access to high quality natural greenspace for communities throughout Lowestoft. Gunton Warren CWS provides habitat for protected reptile species including adder and common lizard, as well</p>	<p>This level of detail is more appropriate in the open spaces Supporting Document</p>	<p>Contact the respondent to agree text to add to SD3</p>

<p>Red and Amber listed Birds of Conservation Concern¹ such as linnet and greenfinch (Suffolk Biodiversity Information Service (SBIS)). Coastal vegetated shingle present here is an internationally rare habitat and plant species which have adapted to this harsh environment, such as sea pea and yellow horned poppy, are nationally scarce. Gunton Meadow CWS is a rare example of lowland meadow (Priority habitat) which is home to several orchid species and associated insect, bird, reptile, amphibian, and mammal species. The Lowestoft Neighbourhood Plan is an opportunity to celebrate the diversity of habitats and species present throughout the town, which will also help to highlight their presence to developers and ensure their protection for future generations. Information on species recorded locally, County Wildlife Sites, Priority Habitats and Species can be obtained from the Suffolk Biological Information Service (http://www.suffolkbis.org.uk/) and the Natural England online interactive map (MAGIC (defra.gov.uk)).</p>		
<p>LOW13 - Anglian Water has a number of network assets within the strategic green landscape area. The policy should therefore not preclude any operational development to enhance and maintain our infrastructure - such as the recent scheme to lay three new sewer pipes in Lowestoft, because existing pipes were at risk from coastal erosion on the beach at Gunton Warren Nature Reserve. We take pride in working with the local community when undertaking works to our assets and network, and we worked in close partnership with East Suffolk Council and the Suffolk Wildlife Trust to plan the best route for the new pipeline. The partnership also prioritised public enjoyment of the nature reserve, with new disabled access installed as part of the project.</p>	<p>As long as this operational development does not adversely affect its open and green character it would not be prevented by this policy</p>	<p>No change required.</p>
<p>LOW13 SCC notes that the Strategic Green Landscape shown in Figure 19 of the Plan is an extensive area, consisting of County Wildlife Sites (CWS), Nature</p>	<p>Agreed not LGS too extensive – if allocated as a number of individual areas the overall effect would</p>	<p>No change needed????</p>

<p>Reserves, an ancient woodland, playing fields, a proposed destination park (WPL2.5) and several Open Spaces that are included in the East Suffolk (Waveney) Local Plan (WLP8.23). SCC acknowledge the significance of this area to the local community, from an ecological and recreational amenity value, as well as providing a valuable open space.</p> <p>SCC understands that there is no legal definition of a Strategic Green Landscape and thus without a specific definition or justifications from an evidence base it has very limited protections. As the designation of Local Green Spaces must be in accordance with paragraphs 101-103 of the NPPF (2021), SCC is unsure what designations this site meets, as it clearly is too large to be considered as a Local Green Space as a singular site. Below are some designation options in a prioritised list which could prove preferable in planning terms:</p> <ol style="list-style-type: none"> 1. Upon review of the Supporting Document, SCC notes that many of the Strategic Green Space Areas (within the Strategic Green Landscape) could potentially meet the criteria set out in the NPPF for designations as Local Green Spaces if designated as individual land parcels. This is based on the view that each site when considered independently is not an extensive tract of land and is shown to be demonstrably special to the community through recreation, tranquillity, or ecological value. Therefore, the Neighbourhood Plan Steering Group could consider including some of these sites in the Local Green Spaces policy, such as those without existing designations of County Wildlife Sites, Local Nature Reserves, or Open Spaces identified in the adopted Local Plan. 2. There is the potential for the Strategic Green Landscape to be designated as a SANG (Suitable Alternative Natural Greenspace), which could alleviate the recreational pressures on the designated areas. 3. SCC notes that Policy LOW9 is titled as “Green Infrastructure, Urban Green Spaces and Biodiversity”, and queries whether some of the sites identified within the Strategic Green Landscape would fall within the remit of this policy as potential wildlife corridors or green infrastructure. 	<p>be to protect an extensive tract of land so danger of being deleted.</p> <p>The SGS does not have to have to match a specific NPPF designation – it can be put forward in the LNDP in its own right.</p> <p>Would double designation be worth doing?</p>	
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<p>East Suffolk Council's Landscape Team might be able to provide more guidance on designation options.</p>	<p>SNAG is: Suitable Alternative Natural Greenspaces (SANGs) are a group of existing open spaces that are undergoing enhancements designed to attract more visitors by providing an enjoyable natural environment for recreation as an alternative to the Thames Basin Heaths Special Protection Area (SPA).</p> <p>Worth thinking about</p>	
<p>LOW14</p>		
<p>LOW14 - I would suggest that the remnant sports area to the north of Saturn Close should be included within the areas identified. This has been subject to considerable development in recent years (albeit for educational purposes) and as a valued 'green space' should benefit from protection.</p>	<p>Noted</p>	
<p>LOW14 The plan should explain what is meant by 'exceptional circumstances'. As currently drawn the inclusion of LGS15 is questionable. There is no public access and no views over the site. Your site assessment in your supporting document only seems to identify ecological values to protect, yet a large chunk of the red polygon is playing field which would not be high in ecological value. Furthermore, the playing field is zoned for residential use in the Sustainable Urban Neighbourhood and Kirkley Waterfront Development Brief. As currently drawn, it is not considered that LGS15 meets the tests in para. 102 of the NPPF. A revision to the polygon to include just the county wildlife site is more likely to meet the criteria and would not conflict with the design brief</p>	<p>Agreed</p>	<p>Remove the playing field from LGS15.</p>

<p>LOW14 - We note that it is proposed to designate LGS 16 as Local Green Space. Land designated as Local Green Space has the same status as Green Belt land as outlined in the National Planning Policy Framework and the associated policy requirements. This potentially could place an unnecessary policy burden which could limit our ability to bring forward investment at this location. For example, engineering operations e.g. the laying of hardstanding, is inappropriate development unless it can be demonstrated that it does not conflict with the openness of the designated land.</p> <p>We would therefore request that the Lowestoft Princes Walk sewage pumping station is removed from the proposed LGS 16 designation.</p>	<p>Agreed the area of the pumping station will be removed (couldn't see it on the map)</p>	<p>Remove the area of the exiting pumping station from the map</p>
<p>LOW14 - Whilst other sites contain below ground network assets such as sewers and rising mains, we do not consider that the policy will restrict any works to upgrade or maintain these assets, which generally are permitted development. However, in terms of Green Belt policy, operational development is permitted. As with Gunton Warren, in certain circumstances, such as coastal erosion we need to relocate our assets to ensure continued operation of our network for the benefit of the wider community. Criterion 3 could usefully include the following wording: c) enables the delivery of essential infrastructure.</p>	<p>The policy would not prevent the below ground work as long as the character and amenity of the LGS is not harmed – the proposed additional clause is therefore not required.</p>	<p>No change required</p>
<p>LOW14 SCC welcomes the 18 designated Local Green Spaces in Policy LOW14 - shown in Figures 20 and 21 - as this supports the ongoing work to make Suffolk the Greenest County12. SCC advises that in other Suffolk Neighbourhood Plans parts 2 and 3 of this Policy are typically deleted in the Examiner's Report, on the grounds of duplicating and augmenting National Policy. SCC, therefore, suggests deleting these parts in advance of that stage. Paragraph 10.37 references Supporting Document 3 – Protecting Open Landscapes, Sports Fields and Local Green Spaces, however, it is not apparent from the Plan alone where this can be located. SCC suggests that the paragraph could detail where on the website it could be found readily accessible.</p>	<p>Support welcome</p> <p>Without these clauses it is not clear what the purpose of allocating the LGS is.</p>	<p>No change required.</p> <p>No change required</p>

LOW15		
LOW15: Dip Farm Golf Course no longer active so now a green space rather than sports. Unclear if it (owned by ESC) will ever return to golf course use (probably not?)	Agreed	Remove Dip Farm Golf course from Policy LOW15. It is already with the Strategic Green Landscape.
LOW15 Supporting text: should reference Local Plan open space designations. The Playing Pitch and Outdoor Sports Facilities Assessment also provides useful information about the demand for and supply of sports pitches and other facilities in Lowestoft and this should be referenced. RSS7 is not a formal recreational or sports space so should be removed.	They stand in parallel no need to duplicate. Agreed RSS 7 Dip Farm Golf course is no longer in use	No change needed Remove RSS7 Dip Farm Gold Course from policy LOW15
LOW15 - Similar to Policy LOW14 Local Green Spaces, the majority of the identified recreational and sports spaces have network assets owned by Anglian Water running through or around the proposed designated areas. Therefore, the policy should be clear that any operational works may be required to enhance or maintain these assets will be permitted.	Noted – the policy does not preclude temporary operational work	No change needed
LOW15 Regarding Policy LOW15, SCC is supportive, however, part 2 would benefit from an addition to the Policy to include reference to accessibility using the following proposed wording: <i>“2. Development adjacent to formal recreation and sports spaces should take opportunities to enhance the space and its connectivity to its surroundings and should have no significant adverse impact on their accessibility, amenity or safety.”</i>	Agreed	Amend section 2 of the policy as suggested
LOW15 SCC suggests the following minor amendment to part 3, to strengthen the protection of the facilities:	Agreed would strengthen policy	Change ‘may be’ to ‘will only be’

<p>“3. Development within formal recreational and sports spaces <i>will only</i> may be supported, providing it is necessary to support the operation and sports or recreational use of the space.”</p>		
<p>Section 11</p>		
<p>There is no policy in this section although it includes a ‘Planning Rational (sp.)’ section. Is this section intended to have a policy? If not could it be removed? If it does stay, some narrative could be included in this section to explain the local issues to readers, and also explain why no policy is included in the neighbourhood plan.</p>	<p>Agreed</p>	<p>This chapter should be revised to explain why the LNDP does not have a policy on this issue</p>
<p>Flooding SCC saw an informal version of the draft Lowestoft Neighbourhood Plan in August/September 2022, and notes that there was a Policy relating to flooding. SCC queries why this policy was removed and requests that it is reinstated. SCC would also recommend that the flooding policy refers to the multifunctionality of SuDS, and the four pillars of sustainable drainage design (quantity, quality, biodiversity, and amenity). To achieve this, the following wording could be added to the reinstated policy: <i>“All drainage systems should deliver biodiversity, amenity, quality, and quantity benefits and be designed to the latest Lead Local Flood Authority guidance including a 12-15% minimum allowance for SuDS provision.”</i></p>	<p>A general policy on flooding is included in the Waveney Local Plan and there is no need to duplicate this. The main reason for a coastal erosion policy would be to identify alternative sites for buildings that were at risk of loss. There are no such buildings in the Town.</p>	<p>The revised para should explain this.</p>
<p>Anglian Water fully supports the use of Sustainable Drainage Systems (SuDS) to address the risk of both surface water and sewer flooding, which have multi-functional benefits including for biodiversity and improving water quality. By default, we support an approach where all surface water flows should be managed using sustainable drainage systems with a strong preference in favour of natural infiltration of rainwater into the ground. It is the Government’s intention to implement Schedule Three of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England in 2024. The Schedule also makes the right to</p>	<p>It’s not clear what this comment is seeking as a change in the Plan. See above re SuDS</p>	<p>No change required</p>

connect surface water run-off to public sewers conditional upon the drainage system being approved before construction can commence.		
LOW16		
12.8: Improvements to Urban Traffic Management Control (UTMC) Systems need to include dedicated, stand alone digital signage on key approach roads into the town to indicate the preferred route based on the prevailing traffic conditions and the operation of bridges or level crossings. These systems can route traffic away from temporary obstacles improving traffic flow. The digital signage needs to be a visual representation of where vehicles should travel, designed for purpose and not a generic text board.	Noted	No change required
12.8: (UTMC) Systems should tie in with popularly used SatNav system. Currently the most popular SatNav in use in the UK is Google Maps which already features extensive opportunities for (UTMC) Systems to integrate with, alerting drivers to preferred routes and when bridges/level crossings may be blocked. Integration should be made with other public accessible online sites.	Noted	No change required
12.8: There are too many traffic light junctions/crossings in the town, especially in the Station Square area. Consideration needs to be given for more mini-roundabout provisions at junctions, which promote better traffic flow and are more visually appealing. Zebra crossings should be promoted and used instead of traffic light crossings, these are more visually appealing, are generally well complied with by motorists and allow traffic to only be hindered for the shortest amount of time. Crossings need to be cyclist friendly and tied into cycle paths.	Noted – this is not within the scope of the LNDP	No change required
12.9: Consideration should be given to a public bike hire scheme, similar to the Boris Bikes in London.	Noted – this is not within the scope of the LNDP	No change required
LOW16 - I really hope something can be done about transport too. I don't drive and commuting outside Lowestoft can be painful (1 hour by bus to	Noted	No change required

<p>Yarmouth, compared to 20mins by car!) I'm jealous of these who don't have to travel. The news is hating on 15 mins cites, but Lowestoft should definitely be one. I'd love to see the town centre thrive again.</p>		
<p>LOW16 This policy sets out some good objectives and useful design criteria. The East Suffolk Cycling and Walking Strategy has now been adopted and it would be useful to reference it within the policy. If there are elements of it you wish to directly support then you could include these in your policies which would give it specific planning weight in decision-making.</p>	<p>Agreed</p>	<p>Add reference to the ESCS in the Para 12.11</p>
<p>Within the Transport and Movement section of the plan, it is important to recognise good accessibility to healthcare facilities and understand the impact of the location of proposed housing growth as it is important to consider health inequalities and not driving areas of deprivation further</p>	<p>Noted</p>	<p>No change required</p>
<p>12.16 This states that “...development without adequate provision will become unviable in a relatively short period of time.” Is ‘unviable’ the best term to use here? This is normally reserved for financial viability when used in planning documents so if this does not relate purely to financial viability then an alternative term would be better here. Perhaps ‘unattractive’, or ‘undesirable’ instead?</p>	<p>‘Viability’ is the usual term</p>	<p>No change required</p>
<p>LOW16 SCC welcomes Policy LOW16 providing for “a balanced and sustainable provision of transport options, including active travel”. SCC recommend the Plan should build further on LOW16 to specifically include those living with low vision/partial sight, those who are blind and those with dementia. Routes should be safe for residents and users of all ages and have mobility issues or frailty. Active travel is important to improve physical and mental health, reduce obesity levels, as well as helping to reduce car usage and minimise levels of air pollution from motorised vehicles. Therefore, the following minor amendment is proposed to part 2 of Policy</p>	<p>Agreed</p>	<p>Amend clause 2 to read “2. The needs and convenience of pedestrians and cyclists should be prioritised, including <i>those with mobility/frailty issues and/or who are blind or partially sighted, through: ...</i>”</p>

<p>LOW16: “2. The needs and convenience of pedestrians and cyclists should be prioritised, including <i>those with mobility/frailty issues and/or who are blind or partially sighted, through: ...</i>”</p>		
<p>LOW16 Policy LOW16 part 2a should be amended to also refer to “<i>the public rights of way network</i>” rather than “surrounding pathways”. There could be a reference to other strategies that support this Neighbourhood Plan. This includes Suffolk County Council’s Green Access Strategy (2020-2030)¹⁴. This strategy sets out the Council’s commitment to enhance public rights of way, including new linkages and upgrading routes where there is a need. The strategy also seeks to improve access for all and to support healthy and sustainable access between communities and services through development funding and partnership working.</p>	<p>Agreed</p>	<p>Replace ‘surrounding pathways’ with ‘the public rights of way network’ in clause 2a of LOW16.</p> <p>Add the Green Access Strategy (2000-2030) to the list of strategies in para 3.10.</p>
<p>Para 12.7 A brief reference is made here to the ‘overall poor’ transportation infrastructure to Lowestoft, SCC asks that further local knowledge is provided in this paragraph to support and further explain this assertion. Whilst this paragraph notes the transport to Lowestoft, SCC recognises that the transportation infrastructure within Lowestoft is also a local issue. SCC encourages the Neighbourhood Plan Steering Group to include their own wording, however, as a starting point such local knowledge could include detail surrounding the significant traffic build-up, particularly along the A47 nearby the Bascule Bridge, during peak hours and the local necessity of the Third Crossing “Gull Wing” Bridge in alleviating some of this internal traffic pressure. The Gull Wing, or Lake Lothing Third Crossing, is a bascule bridge project that has been promoted by SCC in order to help to reduce traffic congestion within the Lowestoft town centre area. This is a committed project currently under construction, which had to demonstrate a business case to get central government and SCC funding. Furthermore, this additional information could include long travel times to other settlements within Suffolk resulting in a sense of disconnection from the local area. The Neighbourhood Plan is an opportunity to highlight local</p>	<p>Does LTC want to do a TTA study?</p>	

<p>issues, implement policy, and promote the local area. It is therefore requested that this paragraph could be re-worded to promote a positive attitude toward the potential improvement of transport to and within Lowestoft, i.e., to identify where there could be improvements to traffic and travel infrastructure, rather than just stating transport as a significant local issue.</p> <p>SCC would suggest that the community could undertake a Traffic and Transport Assessment study in order to clearly identify what the local transportation issues are, where they are located, and how they could be improved.</p>		
<p>Para 12.12</p> <p>SCC notes that reference is made to the “Suffolk County Council Transport Plan” and asks that wording in this paragraph is slightly amended to ensure clarity regarding the document referred to. The following amendment is proposed:</p> <p>“The Suffolk County Council <i>Local Transport Plan 2011-2031 (Part 2 – Implementation Plan)</i>, by Suffolk County Council, estimates that 80% of people living within Lowestoft also work in the town which means that many journeys are short.”</p>	<p>Agreed</p>	<p>Replace para 12.12 with the following:</p> <p>“The Suffolk County Council <i>Local Transport Plan 2011-2031 (Part 2 – Implementation Plan)</i>, by Suffolk County Council, estimates that 80% of people living within Lowestoft also work in the town which means that many journeys are short.”</p>
<p>LOW16</p> <p>Part 2 of Policy LOW16 uses the phrasing of “ease of movement” which is somewhat vague. SCC suggests that Policy LOW16 part 2 should be amended as follows, in order to strengthen the policy:</p> <p>“a. Supporting ease of movement <i>Encouraging active and sustainable travel through walking and cycling infrastructure, in accordance with the Suffolk Design Streets Guide (2022)15 and LTN 1/2016</i>, and making connections....”</p>	<p>Agreed</p>	<p>Change Part 2 of Policy LOW16 to read:</p> <p>“a. Supporting ease of movement <i>Encouraging active and sustainable travel through walking and cycling infrastructure, in accordance with the Suffolk Design Streets Guide (2022)15 and LTN 1/2016</i>, and making connections....”</p>

<p>The planning rationale section on p.59 discusses development related to the renewable energy sector – is this included in local energy schemes?</p>		
<p>LOW17 SCC welcomes Policy LOW17, supporting the provision of local energy schemes. However, SCC would suggest that the policy and supporting text be amended to promote a preference for energy generated from renewable net-zero sources, as this would support the ongoing work towards making the county of Suffolk carbon neutral by 2030; as outlined in SCC’s climate emergency declaration13</p>	<p>Agreed</p>	<p>Add the following para to 13.9 – Energy generated from renewable net zero sources to contribute to the County objective of being net zero by 2030 is preferred.</p>

Appendix 8: Regulation 14 Amendments Supporting Document (published with the October 2023 Regulation 14 Consultation)

Following on from the Regulation 14 Consultation on the Lowestoft Neighbourhood Development Plan in January-March 2023, some amendments were made to the draft Plan, including the introduction of three new policies alongside other amendments. This supplementary document (which does not form part of the formal documentation but will be evidenced in Supporting Document 1 – Statement of Consultation) highlights the changes made from the draft Plan which was presented for consultation in January-March 2023 in the new draft Plan for the consultation period October-December 2023.

3. Overview of Lowestoft

- 3.2 - New mixed-use development named as “North Lowestoft Garden Village”.
- 3.4 - Added reference to “National Planning Policy, the East Marine Plan and the Suffolk Minerals and Waste Plan”
- 3.10 - Added evidence documents “The Scores and Triangle Feasibility Study (2021)”, “Powerpark Design Vision (2020)” and “Town Hall Business Plan (2021)”

4. Community & Stakeholder Engagement

- 4.1 - Added information on consultations that took place from January – March 2023 (Note: These took place as part of the Regulation 14 Consultation in January 2023)

6. Policies

Policies Maps – updated to include new policy areas and remove other areas as part of the plan

7. Seafront and Waterfront

7.12 - Rewritten supporting text

January 2023 text	October 2023 amendment
<i>Refurbishment of The Pavilion (renamed as East Point Pavilion and within the Seafront Masterplan) was completed in June 2022 to encourage tourism and attract new visitors. The surrounding Lowestoft Seafront Vision project area provide opportunities, identified by Wayne Hemingway on behalf of the council, to regenerate the south beach and to bring forward opportunities presented by the seafront</i>	<i>In 2017, Hemingway Design was commissioned to provide a seafront vision for Lowestoft, with the first developments of this being the Pavilion (now known as East Point Pavilion) and the Eastern Edge beach huts. In 2022, East Suffolk Council undertook a Seafront Masterplan that expanded on the vision to bring forward further sites and public realm.</i>

7.13 - Removed reference to polices for the development of sites in the Town. The Lowestoft Neighbourhood Development Plan no longer includes policies on potential developments.

7.18 - Added new wording

January 2023 text	October 2023 amendment
<i>The policy sets a high level of expectation for development in general and in particular the waterfront edge, in recognition of the strategic importance of the site and its potential to</i>	<i>The policy sets a high level of expectation for development of that part of the Kirkley Waterfront site within the LNDP area; and in particularly the waterfront edge, in recognition</i>

<i>support growth in Lowestoft. Active frontages could include elevations with windows or other glazing, balconies, terraces, or entrances.</i>	<i>of the strategic importance of the site and its potential to support growth in Lowestoft. Active frontages could include elevations with windows or other glazing, balconies, terraces, or entrances.</i>
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Policy LOW1

2b - Wording amended

January 2023 text	October 2023 amendment
<i>The seafront and surrounding public realm should be overlooked by active frontages</i>	<i>The building should provide an active frontage as it overlooks the surround public realm and seafront</i>

2c - Wording amended

January 2023 text	October 2023 amendment
<i>The scheme should include a high quality public realm, taking account of the proximity to the war memorial</i>	<i>Proposals for buildings higher than the present pavilion may be supported where they:</i> <ol style="list-style-type: none"> <i>i. demonstrate exceptional design quality;</i> <i>ii. can demonstrate that they would not have an adverse impact on the significance of the South Lowestoft/Kirkley Conservation Area, or the adjacent listed Royal Norfolk and Suffolk Yacht Club, Lowestoft War Memorial and Statue of Triton owing to development in their setting.</i>

2d - Removed – *“Higher buildings may be supported where they demonstrate exceptional design quality”*

Policy LOW2

3 - Reference to policy LOW7 updated to reflect new policy numbering (updated to LOW8).

8. Revitalising the Town Centre

8.3 - Original text removed - *“The following policy responds to Chapter 7, supporting diversification. However, recent changes to Use Classes and permitted development rights undermine this to some extent, potentially making the centre less diverse”*

Supporting text numbers altered to reflect removal of 8.3

8.12 - Heritage Action Zone now referred to as “North Heritage Action Zone”

8.16 - New supporting text added – *“As much of this policy, especially the Historic High Street, is covered by the North Lowestoft Heritage Action Zone, this policy recognises the design principles set out in the North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document (2020).”*

8.21 - Wording amended

January 2023 text	October 2023 amendment
<i>Lowestoft Town Council are the owners of the Town Hall building which is a Grade II listed building within the North Lowestoft HAZ</i>	<i>Lowestoft Town Council are the owners of the Town Hall building which is a Grade II listed building within the North Lowestoft HAZ</i>

<i>Conservation Area. East Suffolk Council owns the open area of the site (to the west) which this policy supports for parking and servicing space. The Town Hall site is therefore also subject to Heritage Policies and the North Lowestoft HAZ Design Guide.</i>	<i>Conservation Area. East Suffolk Council owns the open area of the site (to the west) which this policy supports for parking and servicing space. The Town Hall site is therefore also subject to heritage policies in national and local planning policy including LOW13..</i>
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8.23 - Added link to Lowestoft Town Hall Business Plan (2021)

8.24 - Updated reference to Policy LOW15 to LOW19

Policy LOW3

2 - Wording amended

January 2023 text	October 2023 amendment
<i>Redevelopment of buildings will be supported provided it does not involve the demolition of listed buildings or buildings in a Conservation Area that contributed positively to the architectural, historic or visual interest of the area.</i>	<i>Redevelopment of buildings will normally be supported. Planning applications leading to the loss of or harm to listed buildings will normally be refused and the loss of or harm to non-designated heritage assets in the Conservation Area will be refused if the proposal has an unacceptable effect on the architectural, historic or visual interest of the area.</i>

4 - Wording amended to include reference to North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document

January 2023 text	October 2023 amendment
<i>Upwards extension will be supported, subject to meeting the requirements of design and other policies.</i>	<i>Upwards extension will be supported, subject to meeting the requirements of design and other policies, including the North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document</i>

Policy LOW4 – Kirkley District Shopping Centre

New policy added with supporting text (See draft Plan for full details).

Policy LOW5 – Historic Town Hall Regeneration

2 - Wording amended

January 2023 text	October 2023 amendment
<i>Conversion works for the Town Hall should preserve the special interest of the Listed Building, conserve and enhance the character or appearance of the conservation area in which it is set.</i>	<i>Conversion works for the Town Hall should conserve and/or better reveal the significance of the Listed Building, and conserve and enhance the character and appearance of the North Lowestoft Conservation Area.</i>

9. Living

9.10 - Removed the word “*actually*” so that the second sentence reads as “*The responses informed the structure of the neighbourhood plan and ~~actually~~ noted that the cost of housing in Lowestoft is one of its positive attributes.*”

9.11 - Added the word “*in*” to “*Most recently in March 2020...*”

9.19 - Updated reference from LOW16 to LOW19.

Policy LOW 6 – Residential Development

1 - Wording amended

January 2023 text	October 2023 amendment
<p><i>In addition to the sites allocated in the Local Plan, new residential development will be supported and in the following locations:</i></p> <ul style="list-style-type: none"> <i>a) Sites in the Town Centre, in accordance with Policy LOW3;</i> <i>b) Conversion and adaptation of upper levels above shops and commercial units;</i> <i>c) Development of infill sites within existing residential areas;</i> <i>d) Redevelopment of existing residential buildings, providing it does not involve the loss of a heritage asset.</i> 	<p><i>In addition to the sites allocated in the Local Plan, new residential development will be supported in the following locations:</i></p> <ul style="list-style-type: none"> <i>a) Sites in the Town Centre, in accordance with Policy LOW3;</i> <i>b) Conversion and adaptation of upper levels above shops and commercial units where there is mutual compatibility between uses;</i> <i>c) Development of infill sites within existing residential areas;</i> <i>d) Redevelopment of existing residential buildings, providing it does not involve the loss of a heritage asset and there is no conflict with policies restricting houses in multiple occupation.</i>

10. Environment and Place

10.9 - Added reference to “WLP1.3 – Infrastructure”

10.10 - New supporting text added (moving previous 10.10 to 10.11) – *“The Local Plan recognises the responsibility for new developments to contribute to the cost of new infrastructure, either through section 106 planning obligations or the Community Infrastructure Levy. Waveney has had a Community Infrastructure Levy in place since August 2013.”*

10.12 New supporting text added (moving previous 10.12 to 10.14) – *“The South Lowestoft/Kirkley Conservation Area appraisal focuses on the mid-nineteenth century development of Lowestoft into a seaside pleasure resort and explains the historical connection between the town and its sea and maritime activities -*

‘The South Lowestoft / Kirkley Conservation Area is notable for its historic association with Sir Samuel Peto which has influenced its development into a seaside pleasure resort and has provided the settlement with its distinctive character and appearance. The predominant age of the present townscape dates to the mid nineteenth century, and the majority of buildings reflect the architectural style of the Victorian period. It is a formally planned town, with central roads and grid like streets radiating out to afford views towards the sea. Green and open spaces are designed into the townscape and contribute to its strong sense of grandeur. The town has retained a strong relationship with the sea and maritime activities, discernible through building orientations, building types, statues, and spaces such as the promenades and piers. These elements provide focal points within the Conservation Area and contribute to its special interest. There are also later Edwardian and twentieth-century villas and houses throughout the area, particularly where residential development has continued to expand to the south.’”

10.13 - Wording amended

January 2023 text	October 2023 amendment
<p><i>Included within the northern limits of the Conservation Area is Belle Vue Park. The Waveney Strategic Play Evaluation Action Plan (November 2015) undertaken by Sentinel found that Lowestoft scored lowest after Halesworth</i></p>	<p><i>Included within the northern limits of the Conservation Area is Belle Vue Park. The Waveney Strategic Play Evaluation Action Plan (November 2015) undertaken by Sentinel found that Lowestoft had medium levels of quality for</i></p>

<i>and Holton for average play space provision quality across the board, for toddlers, juniors and teens. Whilst this showed some improvement since 2010, this was a low base and requires enhancement.</i>	<i>its play areas. Whilst this showed some improvement since 2010, this was a low base and requires enhancement.</i>
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10.14 - Wording amended

January 2023 text	October 2023 amendment
<i>The historic High Street and Scores area are the subject of a Heritage Action Zone. This recognises the need for regeneration and enhancement. The Scores and Triangle Market Feasibility Study identified twelve new pocket parks and gardens that could reimagine wasteland behind the Scores as green open spaces for communities and visitors. The HAZ is an area-based, time-limited project that will conclude in 2023, but could be extended.</i>	<i>The historic High Street and Scores area are the subject of a Heritage Action Zone. This recognises the need for regeneration and enhancement. The Scores and Triangle Market Feasibility Study identified a number of opportunities for pocket parks and gardens that could reimagine wasteland behind the Scores as green open spaces for communities and visitors. The HAZ is an area-based, time-limited project that will conclude in 2023.</i>

10.15 - Link to “Open Spaces Needs Assessment WDC July 2015” document.

10.19 - Added wording – “A similar appraisal and management plan for the South Lowestoft and Kirkley Conservation Area was adopted in January 2022.”

10.23 - Updated reference to Policy LOW16 to LOW19.

10.27 - New supporting text added – “The Government provides advice about Priority Habitats which should be taken into account in mitigating adverse effects on biodiversity and creating new habitats – see <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>. Suffolk County Council’s Nature Strategy also provides guidance - <https://www.suffolk.gov.uk/asset-library/imported/suffolks-nature-strategy-2015.pdf>. “

10.29 - New supporting text added – “Green spaces should be made attractive in design, be inviting, and feel safe, with where appropriate facilities accessible to residents with limited mobility such as shelters and benches, well-maintained paths with good lighting.”

10.41 - New supporting text added – “The designated Strategic Green Space along the northern coastline of Lowestoft is too extensive to be classified as a Local Green Space. Further detail on the individual components within the Strategic Green Space can be found in Supporting Document 3 – Protecting Open Landscapes, Sports Fields and Local Green Spaces.”

10.43 - New supporting text added – “This policy augments Policy WLP8.23 of the Waveney Local Plan.”

Policy LOW9 – Design and Character

6 - Amended wording

January 2023 text	October 2023 amendment
<i>Street layouts should be designed for low vehicle speeds, with varied provision of parking so that traffic and vehicles do not dominate the public realm, and in accordance with the Suffolk Design Streets Guide.</i>	<i>Street layouts should be designed for low vehicle speeds, prioritising pedestrians and cyclists in order to encourage sustainable travel, with varied provision of parking so that traffic and vehicles do not dominate the public realm, and in accordance with the Suffolk Design</i>

	<i>Streets Guide, Suffolk Guidance for Parking and any successor documents.</i>
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10 - Amended wording

January 2023 text	October 2023 amendment
<i>Future maintenance requirements should be considered in the design, layout and spacing of properties.</i>	<i>Future maintenance requirements should be considered in the design, layout and spacing of properties but not to the detriment of providing ongoing green infrastructure and Biodiversity Net Gain.</i>

Policy LOW10 – Green Infrastructure, Urban Green Spaces and Biodiversity

1 - Added reference to developments achieving “at least 10% biodiversity”.

2 - Wording amended

January 2023 text	October 2023 amendment
<i>Development sites should be based on a masterplan for the whole site, including the location of key pedestrian, new urban green space and other green infrastructure.</i>	<i>As appropriate to their scale, nature and location, development sites should be based on a masterplan for the whole site, including the location of public rights of way, new urban green space and other green infrastructure.</i>

3d - New wording added – “incorporate multi-functional green infrastructure such as sustainable drainage systems (SUDS)”

4 - Wording amended

January 2023 text	October 2023 amendment
<i>Existing ponds should be protected from development.</i>	<i>Ponds, outside of the curtilage of existing homes, and the connections between them should be protected from development.</i>

Policy LOW11 – Infrastructure

New policy, community aspiration and supporting text added (See draft Plan for full details).

Policy LOW14 – South Lowestoft and Kirkley Conservation Area

New policy and supporting text added (see draft Plan for full details).

Policy LOW17 – Local Green Spaces

LGS15 Kirkley Waterfront Wildlife Site removed from policy and Plan (including removal from policy map)

Policy LOW18 – Recreational and Sports Spaces

RSS7 Dip Farm Golf Course removed from policy (including removal from policy map) but retained in Strategic Green Space (now referenced as “Former Dip Farm Golf Course”).

2 - Wording amended

January 2023 text	October 2023 amendment
<i>Development adjacent to formal recreation and sports spaces should take opportunities to</i>	<i>Development adjacent to formal recreation and sports spaces should take opportunities to</i>

<i>enhance should have no significant adverse impact on, their accessibility, amenity or safety.</i>	<i>enhance, the space and its connectivity to its surroundings and should have no significant adverse impact on, their accessibility, amenity or safety.</i>
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3 - Wording amended

January 2023 text	October 2023 amendment
<i>Development within formal recreational and sports spaces may be supported, providing it is necessary to support the operation and sports or recreational use of the space..</i>	<i>Development within formal recreational and sports spaces will only be supported, providing it is necessary to support the operation and sports or recreational use of the space.</i>

11. Transport and Movement

11.11 - Added wording to supporting text – “*East Suffolk Council’s Cycling and Walking Strategy (2022) identifies key cycling and walking infrastructure recommendations across East Suffolk, including recommendations for routes in Lowestoft.*”

11.12 - Amended wording

January 2023 text	October 2023 amendment
<i>The Suffolk County Council Transport Plan, estimates that 80% of people living within Lowestoft also work in the town which means that many journeys are short.</i>	<i>The Suffolk County Council Local Transport Plan 2011-2031 (Part 2 – Implementation Plan), by Suffolk County Council, estimates that 80% of people living within Lowestoft also work in the town which means that many journeys are short.</i>

11.17 - Updated reference to Policy LOW7 to LOW8.

Policy LOW19 – Balanced Transport Provision

2 - Amended wording

January 2023 text	October 2023 amendment
<i>The needs and convenience of pedestrians and cyclists should be prioritised, including:</i> <i>a. Supporting ease of movement and making connections to surrounding pathways, as required by policy LOW8.</i> <i>b. Designing for low vehicle speeds, varied provision of parking and ensuring that the public realm is not dominated by traffic and parking, as required by Policy LOW8;</i> <i>c. Including convenient links within the layout of new development to nearby public transport facilities.</i>	<i>The needs and convenience of pedestrians and cyclists should be prioritised, including those with mobility/frailty issues and/or who are blind or partially sighted, through:</i> <i>a. Supporting ease of movement, encouraging active and sustainable travel through walking and cycling infrastructure, in accordance with the Suffolk Design Streets Guide (2022)¹⁵ and LTN 1/2016, and making connections to the public rights of way network, as required by policy LOW9.</i> <i>b. Designing for low vehicle speeds, varied provision of parking and ensuring that the public realm is not</i>

	<p><i>dominated by traffic and parking, as required by Policy LOW9;</i></p> <p><i>c. Including convenient links within the layout of new development to nearby public transport facilities.</i></p>
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3 - Added wording – “...in accordance with Suffolk Guidance for Parking (2019), or any successor document.”

6 - Removed “for visitors”.

12. Sustainable Energy

12.9 - Wording added – “Energy generated from renewable net zero sources to contribute to the County objective of being net zero by 2030 is preferred.”

Appendix 9: Responses to Regulation 14 Pre-Submission Consultation (October 2023)

Consultation Comments	Response	Actions
General Comments		
Page 7 – I want to know how each of Lowestoft’s policies feed into East Suffolk’s policies and plans, so that changes are beneficial and as you describe and intend them to be.	The policies in the Lowestoft NDP (LNDP) and the policies in the Waveney Local Plan together make up the Development Plan for the Lowestoft Town area and planning applications are determined by considering both sets of policies.	No change proposed. Reply to the respondent?
Page 7 – I’d like to know what you propose to demolish on the seafront, particularly if you’ll be keeping the Bauhaus style buildings as they’re really nice and attractive?	Couldn’t find this proposal on page 7 – the reference seems to be to South Pier Pavilion – there are no proposals to demolish.	No change proposed
Page 7 – Will you provide the lift to the beach where Zak’s is located at present? Will the Zak’s building be demolished in the process of regenerating the sea frontage/beach?	There are no proposals for the Zak’s building in the LNDP.	No change proposed Comments passed onto ESC
Full support the ideas to protect what we have (i.e. heritage and green spaces)	Comment welcome	No change proposed
Clifton Road Car Park – It’s always empty! Make the Car Park either “free” for 2 hours to enable people to spend more time in Kirkley. Also some larger businesses have lots of staff. If a monthly permit could be offered to people working in Kirkley (i.e. monthly car park fee £20). Have been commenting on this car park for years, but nothing has been done.	The scope of the LNDP does not include car park charging.	No change proposed Comments passed onto ESC
Once the new bridge opens there will be less traffic in Kirkley which means less people spending money.	Comment noted. No evidence presented for this assertion.	No change proposed
We note that Section 6.6 of the draft Lowestoft Neighbourhood Development Plan dated October 2023, sets out that the policies of the plan are contained within several chapters with ‘Flooding’ being a chapter. However, it is disappointing to note that the draft plan currently does not include the chapter on ‘Flooding’ and so currently has no policies on flood risk. Lowestoft is at tidal flood risk from the North Sea and at fluvial flood risk from Kirkley Stream. Please ensure that the plan assesses all sources of flood risk. Should any new development be sited within the floodplain they	Policies regarding flood risk in development plans can restrict building in flood risk areas and allocate sites for buildings to replace buildings that could be lost to sea related erosion. There are no buildings at risk of the latter which could be relocated within the boundaries of Lowestoft town.	No change proposed.

<p>should consider our general flood risk guidance below. All development proposals within the Flood Zone (which includes Flood Zones 2 and 3, as defined by the Environment Agency) shown on the Policies Map and Local Maps, or elsewhere involving sites of 1ha or more, must be accompanied by a Flood Risk Assessment.</p>	<p>Neighbourhood Development Plans (NDPs) do not have to cover every aspect of planning policy and in the case of flooding the LNDP could not add anything to that already covered by policies in the Waveney Local Plan.</p>	
<p>Front Cover - It's a good photograph but it shows mainly the north of the town and the coastline towards Great Yarmouth. Much of the south of Lowestoft is missed off, giving the impression of a smaller town. Is it possible to find a photograph which captures all of Lowestoft, or at least all of the Neighbourhood Area?</p>	<p>Agreed – change photo on front cover</p>	<p>New cover photo to be sourced</p>
<p>Para. 1.1 – This lists all positive features except ‘areas of deprivation.’ It would work better to list all the positives and then add: ‘as well as areas of deprivation’. The second sentence currently says ‘...as well as beaches and being a magnet for tourism...’. Improved wording could be ‘... beaches which make the town a magnet for tourism’?</p>	<p>Agreed</p>	<p>Amend para 1 as suggested.</p>
<p>The vision is very short. It could be expanded to include some locally distinctive aspects of Lowestoft. It could be expanded to cover more of the elements that are outlined in the Aims. For example, more focus could be put on the natural environment and housing as key elements of this plan that have not been directly referenced in the Vision. The aims are also brief and it feels like they could be more distinctive to Lowestoft. E.g.: Are there particular business sectors that are of importance to the town? Include mention of the beach. Any benefits you would like to maximise and build on as a result of infrastructure projects like the third crossing or the flood risk management project? Include initiatives such as Heritage Action Zones. Without referencing specific local details then this section runs the risk of feeling a little generic.</p>	<p>The vision and aims work together and there is no need to duplicate them. They have been derived from the initial consultation.</p>	<p>No change proposed.</p>

Para 3.6 - This would be a good place to include mention of the flood risk management project.	Flood defences are not usually dealt with in NDPs, unless they have a significant land use effect.	No change proposed
Para 3.8 - Details of the five Towns deal projects would be helpful. Sp.: 'This Fund enables work to progress on five major regeneration projects...' Including the objectives of the Lowestoft Investment Plan would be very beneficial for this section.	These details are provided in related documents – listed in para 3.10 - and do not need to be repeated in the LNDP which is not a general reference document.	No change proposed
Fig 6 - This chart shows that cultural and waterfront aspects could be better in Lowestoft. Accordingly, the neighbourhood plan should reference the ongoing and delivered projects to deliver the seafront vision and towns deal projects. If you need any details or information about these types of projects ESC would be happy to assist.	As above.	No change proposed
5. Basic Conditions - There are references to a 'Statement of Basic Conditions' which doesn't seem to be available. Presumably this will be part of the documents when the neighbourhood plan is submitted to the Local Planning Authority. These references are confusing for readers when included in the plan at this stage and without the referenced documents.	Yes the Statement of Basic Conditions will be submitted with the Submission (Section 16) draft of the Plan when it is submitted to the District Council. This draft should have said 'will form SD2...' but it doesn't need changing as it will be correct for the Submission draft.	No change needed.
Policies Map - no keys have been provided on the policies maps. These should be added to show what the polygons on the maps represent. The policies map should also include the outline of the Neighbourhood Area. The primary shopping area is missing from these plans. The north and south Conservation Areas could be added.	Agreed – this applies to some of the other figures in the Plan as well which also need a key.	Amend the Policies Map to show the Plan area and all relevant policies i.e. those which can be identified geographically and add a key.
Para 7.1 - "To modernise the waterfront and seafront to increase its attraction to tourists and visitors..." – this objective is ok in general, but care should be taken around how this objective is applied to the Kirkley Waterfront site due to complexities around achieving waterfront access in the Lowestoft part of the site. See comments of LOW2 for further details. There is no mention of the Gull Wing river crossing here which is extremely relevant to this section. There are very few mentions of this throughout the document despite it being such a key piece of	Noted	No change proposed

infrastructure for the town. Are there any aspirations to build on the benefits the crossing will deliver? The Flood Risk Management Project is also of relevance in this section and should be referenced more in the plan.	The Plan should focus on positive proposals where it can make a difference and not just comment on what is already happening or become a general reference document for all the activities/proposals in the Plan area.	No change needed
Para 7.2 - The NPPF reference needs to be updated to the latest 2023 version.	Agreed	Amend 2021 to 2023
Para 7.6 - Should this be indented further to match the other paragraphs in this part of the plan?	Doesn't need further indentation	No action needed
Para 7.10 - "The temptation for the strategic housing sites and other key sites may be to adopt a development-at-any-cost approach, including acceptance of poor design." – What is the foundation for this statement? Without a basis this type of statement is not very helpful. A build at all costs approach is not supported by East Suffolk. The plan should take an objective stance and be informed by sound evidence.	This is a duplicate of comments made on the original Reg 14 consultation – see response in appendix 7 of this Consultation Statement	No change proposed
Para 7.11 - This para discusses reductions to Affordable Housing requirements. The Local Plan policy WLP8.2 allows for this where it is evidenced by a viability assessment. This should be clearly reflected in the neighbourhood plan text. Additionally, the statements regarding environmental performance, running costs etc. in this paragraph do not seem to be reflected in the Plan's policies. This mismatch between this paragraph and the content of the plan's policies should be addressed.	This is a duplicate of comments made on the original Reg 14 consultation – see response in appendix 7 of this Consultation Statement Agreed	No change proposed. Paragraph 7.11 deleted
Para 7.12 - This section needs rewording. In 2017 Hemingway Design provided a seafront vision, and the first development of this was the Pavilion along with the Eastern Edge beach huts (no mention of these). In 2022 ESC undertook a seafront masterplan that expanded on the vision to bring forward further sites and public realm. This should also be referenced: https://thinklowestoft.co.uk/seafront-masterplan/	This is a duplicate of comments made on the original Reg 14 consultation – see response in appendix 7 of this Consultation Statement	Requested change already made to para 12.
Para 7.13 - This paragraph would probably work better as part of the LOW2 section.	Its equally suitable where it is. The Planning Rationale section (paras 7.7 – 7.13) introduce the whole of the chapter included LOW2.	No change proposed

<p>I read with interest you are inviting comments regarding the proposed Lowestoft development plan. Firstly I would just like to state I have no particular axe to grind for any political party, and my comments are not to make any party political points in particular. Although I do think it necessary to apportion blame to the guilty parties when either mistakes are made, or their ill-conceived (voter placating and political) plans come back to bite them in the bum. Indeed, nothing ever happens in a political vacuum.</p> <p>In general most of the refurbishments you are proposing amount to little more than the normal progressive improvements that would happen naturally in a thriving and broad-based local economy, or alternatively the general maintenance of the streetscape and environs that is the ongoing responsibility of the local council. A responsibility that has been ignored over the past few years in an attempt to satisfy budgetary requirements in pursuance of a political and financially illiterate mandate. The outcome of which we are all currently experiencing.</p> <p>This is why I am so concerned about your expensive and dubious development plans. Some of which, such as the proposed 'Battery Green cultural quarter' is clearly to recover from Waveney District Council's past mistakes.</p> <p>Another of my concerns is that to “renovate and refurbish” amenities in the town that have suffered from the lack of the required maintenance and budget, and the wider malaise of the downward turn of the broader economy, in my estimation shows a lack of understanding of the inherent problems and is actually futile.</p> <p>The problem of shops and other leisure businesses closing over the last decade has not been due to a lack of said amenities or even the state of those amenities. It is due to a lack of footfall, as the reduction in the</p>	<p>Comments noted – no specific changes requested</p>	<p>No change proposed</p>
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<p>public's disposable income due to the issues mentioned above begin to bite, and can only (as we are seeing) worsen with time. How can spending large amounts of money on the town and 'rolling it in glitter' make any difference to the situation you propose to address. Especially as every other small coastal town is doing exactly the same thing to raise standards and visibility, to increase visitors numbers, and "create growth".</p> <p>What dear old Lowestoft needs is to make more of its natural and unique properties which so many other places can only dream of and would have, before now, undoubtedly made the most of. I draw your attention to Ness point a Unique Selling Point if ever there was one, and which to overlook is in my humble opinion, negligent.</p> <p>To this end, I have once again attached a copy of my proposal should you be lacking in either ideas, inspiration or 'Vision'.</p>		
<p>We welcome all the positive aspects of the current LNDP but it is our conviction that the plan does not go far enough and that its priorities need to be re-ordered to recognise the importance of climate change impacts. Our LNDP has the potential to be a truly ambitious plan that would put Lowestoft at the forefront of planning for better and more sustainable communities nationally; and since the town is at the forefront of the consequences of climate change, that seems wholly appropriate. We recognise that the climate science is evolving rapidly but overall, we do not believe that the current draft neighbourhood plan provides a clear narrative about the scale of the threats from sea level rise and storm surge and the consequences of those threats for the social and economic development of our town.</p> <p>As a result, the group wishes to formally object to the plan in its current form. We would very much welcome a close engagement with the town council to ensure that the final plan reflects a realistic appreciation of the climate impacts and a clear strategy to both positively address</p>	<p>The comments are welcome but they do not take into account of the focus and limitations of development plans on land use. Many policies in the Plan – e.g. LOW8 (5), LOW9 (8) - do address carbon reduction explicitly and implicitly The comments do not make specific proposals for changes to existing policies or new policies of a land use character to make the Plan more climate friendly.</p> <p>Objection noted.</p>	<p>No changes proposed.</p>

<p>those threats and to utilise the challenge they present to create a transformed living environment for the people of Lowestoft.</p> <p>For the Lowestoft LNDP that means adopting specific policies which:</p> <ul style="list-style-type: none"> • Support ‘radical’ reductions in carbon emissions in line with the 2008 Climate Act as required by the National Planning Policy Framework paragraph 152 and footnote 53². • Support a range of resilience measures to deal with the 1.9 metres of sea level rise predicted under the H++ scenarios by 2100. Measures must also be fit to deal with the increasing frequency and severity of storm surge, river flooding and rapidly increasing surface water flooding. <p>The LNDP must reflect the degree to which existing and planned flood defence measures meet the test in National Planning Guidance of making homes safe over their whole lifetime which means at least 100 years. The plan must also show how it has considered the kinds of approaches to building resilience set out in the National Coastal Erosion and Risk Management Strategy.</p> <p>Every planning decision has to revolve around making it sustainable, not for a few years, but for 100 years. To this end, this Neighbourhood Plan must consider all aspects from the perspective that the actions we take now will influence the next hundred years, from education to flood defence to health. As a result, we believe the plan should be significantly restructured to prioritise climate change as the lens through which all other policies are delivered. In addition, the plan must include specific policies which can deliver on the requirement to reduce carbon emissions and build climate resilience.</p> <ul style="list-style-type: none"> • The Lowestoft LNDP must have a clear policy to ensure that all new homes must be next zero and to achieve this the 		
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<p>Passivhaus Housing standards should be adopted. We note that central Lincolnshire council has adopted such standards.</p> <ul style="list-style-type: none"> • Affordable housing is a major problem in Lowestoft. Current local plan policy is for the provision of a proportion of 30% affordable homes; but since many of these housing products are not genuinely affordable the neighbourhood plan should require that all affordable homes in Lowestoft should be provided as social rent. The extra build cost of producing affordable and sustainable housing can be bridged by prioritising quality and sustainability over profit in agreements concerning development of council-owned land and other grants of planning permission. • New housing must be accompanied by sustainable urban drainage systems (GREEN SUDS) and by property level flood resilience measures. • The LNDP should set out a green infrastructure strategy for our town which maps all of the green spaces and aims to increase green space by 10% over existing levels over the next five years. Neighbourhood plan policy should identify sites suitable for biodiversity enhancement and for local food growing. <ul style="list-style-type: none"> • All new homes in Lowestoft should be required to meet the National Space Standards and to be designed to meet lifetime home standards of accessibility. • All new development must be well connected to Sustainable transport infrastructure so that basic services such as shops and key social facilities are no more than a 15-minute walk. 	<p>This would be contrary to national policy and struck out by the Examiner. Such proposals are in supporting documents to the CLLP not in the Plan itself.</p> <p>Set at District level – the only housing site in the plan area is covered by Waveney Local Plan policies and a Development brief.</p> <p>Already in plan – see para 10.26.</p>	
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	<p>A green infrastructure strategy could be a supporting document to the LNDP - there is little opportunity to expand green space as the Town is substantially developed within its boundary which is why the Plan places considerable emphasis on protecting the green spaces that do exist.</p> <p>LOW10 covers this already</p> <p>See LOW8 (1).</p>	
<p>We are pleased to note a number of policy amendments have been included following our earlier advice dated 3/3/23. We also welcome specific policies which focus on the South Lowestoft/Kirkley Conservation Area which we anticipate will build upon the work undertaken within the High Streets Heritage Action Zone.</p> <p>We would, however, encourage further consideration of our earlier advice which may in some instances provide clarity for the plan's readers (i.e. the inclusion of a key on each policy map), or those which sought to further strengthen the plan's intended aims, vision and interpretation.</p>	<p>Comments welcome</p> <p>Agreed - Maps should have keys</p>	<p>Keys to be added to all Figures where required and the Policies map</p>
<p>As you have highlighted within the document that your policies align with the 'Waveney Local Plan', we recommend the inclusion of how your plan aligns with the 'East Marine Plans' is presented in a similar format.</p> <p>Further policies that relate to your development plan are included below:</p>	<p>This is a list of policies in the East Inshore and East Offshore Marine Plans. It is not clear what changes to policies in the LNDP are being requested.</p> <p>Reference to the Plans will be made in para 3.10</p>	<p>Add the EIEOMPs to the list of relevant plans and strategies in para 3.10.</p>

<ul style="list-style-type: none"> • EC1: Proposals that provide economic productivity benefits which are additional to Gross Value Added currently generated by existing activities should be supported. • EC2: Proposals that provide additional employment benefits should be supported, particularly where these benefits have the potential to meet employment needs in localities close to the marine plan areas. • EC3: Proposals that will help the East marine plan areas to contribute to offshore wind energy generation should be supported. • SOC1: Proposals that provide health and social well-being benefits including through maintaining, or enhancing, access to the coast and marine area should be supported. • SOC2: Proposals that may affect heritage assets should demonstrate, in order of preference: <ul style="list-style-type: none"> a) that they will not compromise or harm elements which contribute to the significance of the heritage asset b) how, if there is compromise or harm to a heritage asset, this will be minimised c) how, where compromise or harm to a heritage asset cannot be minimised it will be mitigated against or d) the public benefits for proceeding with the proposal if it is not possible to minimise or mitigate compromise or harm to the heritage asset • SOC3: Proposals that may affect the terrestrial and marine character of an area should demonstrate, in order of preference: <ul style="list-style-type: none"> a) that they will not adversely impact the terrestrial and marine character of an area b) how, if there are adverse impacts on the terrestrial and marine character of an area, they will minimise them c) how, where these adverse impacts on the terrestrial and marine character of an area cannot be minimised they will be mitigated against d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts 		
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<ul style="list-style-type: none"> • ECO1: Cumulative impacts affecting the ecosystem of the East marine plans and adjacent areas (marine, terrestrial) should be addressed in decision-making and plan implementation. • BIO1: Appropriate weight should be attached to biodiversity, reflecting the need to protect biodiversity as a whole, taking account of the best available evidence including on habitats and species that are protected or of conservation concern in the East marine plans and adjacent areas (marine, terrestrial). • BIO2: Where appropriate, proposals for development should incorporate features that enhance biodiversity and geological interests. • GOV1: Appropriate provision should be made for infrastructure on land which supports activities in the marine area and vice versa. • WIND1: Developments requiring authorisation, that are in or could affect sites held under a lease or an agreement for lease that has been granted by The Crown Estate for development of an Offshore Wind Farm, should not be authorised unless <ul style="list-style-type: none"> a) they can clearly demonstrate that they will not compromise the construction, operation, maintenance, or decommissioning of the Offshore Wind Farm b) the lease/agreement for lease has been surrendered back to The Crown Estate and not been re-tendered c) the lease/agreement for lease has been terminated by the Secretary of State d) in other exceptional circumstances • PS1: Proposals that require static sea surface infrastructure or that significantly reduce under-keel clearance should not be authorised in International Maritime Organization designated routes. • PS2: Proposals that require static sea surface infrastructure that encroaches upon important navigation routes should not be authorised unless there are exceptional circumstances. Proposals should: <ul style="list-style-type: none"> a) be compatible with the need to maintain space for safe navigation, avoiding adverse economic impact 		
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<p>b) anticipate and provide for future safe navigational requirements where evidence and/or stakeholder input allows and</p> <p>c) account for impacts upon navigation in-combination with other existing and proposed activities</p> <ul style="list-style-type: none"> • PS3: Proposals should demonstrate, in order of preference: <ul style="list-style-type: none"> a) that they will not interfere with current activity and future opportunity for expansion of ports and harbours b) how, if the proposal may interfere with current activity and future opportunities for expansion, they will minimise this c) how, if the interference cannot be minimised, it will be mitigated d) the case for proceeding if it is not possible to minimise or mitigate the interference • DD1: Proposals within or adjacent to licensed dredging and disposal areas should demonstrate, in order of preference <ul style="list-style-type: none"> a) that they will not adversely impact dredging and disposal activities b) how, if there are adverse impacts on dredging and disposal, they will minimise these c) how, if the adverse impacts cannot be minimised they will be mitigated d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts • FISH1: Within areas of fishing activity, proposals should demonstrate in order of preference: <ul style="list-style-type: none"> a) that they will not prevent fishing activities on, or access to, fishing grounds b) how, if there are adverse impacts on the ability to undertake fishing activities or access to fishing grounds, they will minimise them c) how, if the adverse impacts cannot be minimised, they will be mitigated d) the case for proceeding with their proposal if it is not possible to minimise or mitigate the adverse impacts • FISH2: Proposals should demonstrate, in order of preference: 		
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<p>a) that they will not have an adverse impact upon spawning and nursery areas and any associated habitat</p> <p>b) how, if there are adverse impacts upon the spawning and nursery areas and any associated habitat, they will minimise them</p> <p>c) how, if the adverse impacts cannot be minimised they will be mitigated</p> <p>d) the case for proceeding with their proposals if it is not possible to minimise or mitigate the adverse impacts</p> <ul style="list-style-type: none"> • TR1: Proposals for development should demonstrate that during construction and operation, in order of preference: <ul style="list-style-type: none"> a) they will not adversely impact tourism and recreation activities b) how, if there are adverse impacts on tourism and recreation activities, they will minimise them c) how, if the adverse impacts cannot be minimised, they will be mitigated d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts • TR2: Proposals that require static objects in the East marine plan areas, should demonstrate, in order of preference: <ul style="list-style-type: none"> a) that they will not adversely impact on recreational boating routes b) how, if there are adverse impacts on recreational boating routes, they will minimise them c) how, if the adverse impacts cannot be minimised, they will be mitigated d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts • TR3: Proposals that deliver tourism and/or recreation related benefits in communities adjacent to the East marine plan areas should be supported. 		
<p>Statuslist are broadly supportive of the themes expressed within the draft Plan and welcome the progress made from the previous Regulation 14 consultation in early 2023. The purpose of these representations is to respond to the updated plan, including the</p>	<p>Comments welcome</p>	<p>No changes required.</p>

<p>emerging vision, objectives, and policies, and to reaffirm the deliverability of the former Jeld Wen Factory site to provide positive transformational change to this key previously developed (brownfield) site, to create a new vibrant and inclusive community within a high-quality environment.</p> <p>The vision and overall planning strategy for the Neighbourhood Plan, as set out in Paragraph 2.1 (vision) and 2.2 (Aims) are supported in principle. Both are considered to be aspirational and deliverable, striking a balance between recognising that new development is needed to meet the diverse needs of the community, whilst ensuring that development is sustainable and respectful of the character and heritage of Lowestoft. The vision and objectives proposed should help to deliver tangible economic, social, and environmental benefits for Lowestoft, which is to be commended.</p> <p>Indeed, the vision and aims align with Statuslist’s aspirations to deliver high-quality, sustainably designed and constructed new neighbourhood at Kirkley Waterfront. The scheme will seek to deliver a range of new housing and employment to meet identified local needs, alongside high-quality green infrastructure enhancements.</p> <p>The draft Plan refers to adopted Local Plan allocation WLP2.4 Kirkley Waterfront and Sustainable Urban Neighbourhood, part of which falls within the Lowestoft Neighbourhood Plan area. Supporting text at paragraph 7.7 recognises the strategic importance of the Kirkley Waterfront site and reaffirms support in the Neighbourhood Plan to help shape the forthcoming development and ensure it is sustainable, high quality and appropriate for the waterfront location. The Town Council’s recognition of the importance of the site is supported and echoed by Statuslist.</p>		
<p>We are pleased to see that the Lowestoft Neighbourhood Plan recognises the importance of biodiversity and proposes measures to protect and enhance it within Policy LOW10 and LOW16. We are please</p>	<p>Comments welcome</p>	

<p>to see our previous recommendation to expand the policy, ensuring greater protection for biodiversity, has been undertaken. We note in Section 10.28 the mitigation hierarchy is put forward and includes the important first step of avoiding impacts. However, the final step to provide enhancement should also be included after compensation.</p>	<p>Policy LOW10 contains criteria for the protection of biodiversity. Agreed that the policy could refer to enhancements. The Examiner of the Hoxne NDP recently amended a similar policy to state: ‘Ecological assets should be protected, restored and enhanced. Development proposals should avoid the loss of, or substantial harm to biodiversity habitats. Where such losses or harm are unavoidable, adequate mitigation measures or, as a last resort, compensation measures will be sought. If suitable mitigation or compensation measures cannot be provided, then planning permission should be refused. Development proposals should demonstrate the measures proposed to achieve biodiversity net gain. The extent of any net gain in biodiversity should be in accordance with national policy.’</p> <p>Agreed that mapping would be helpful to provide further evidence to support LOW10.</p>	<p>Amend Policy LOW10 clause 1 as follows:</p> <p>Development should have no overall significant adverse effect on biodiversity <i>and ecological assets should be protected, restored and enhanced.</i></p>
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As per our previous comments, we highlight that the NPPF (2021) (Section 179) identifies that plans should 'Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them' and 'promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.' Considering the emphasis within the NPPF to map and safeguard wider ecological networks, we recommend highlighting the links between Policies LOW10 and LOW16 as an important ecological network where Biodiversity Net Gain and enhancement from development could be targeted to help improve habitats for key species. While we note that references to ecological networks have been made within LOW10, clear mapping of these could improve the policy.

We do note that Policy LOW16 provides clear information and mapping of greenspaces within the town. We welcome this information, which we think could be improved by adding to clarity in maps to which areas of greenspace are designated County Wildlife Sites (CWSs); the importance of all accessible greenspace is important in built-up areas such as Lowestoft, and allowing further understanding for development to link greenspace of noted wildlife value can help new design to increase habitat connectivity.

Considering the number and biodiversity value of CWSs within Lowestoft we recommend including a map within the Neighbourhood Plan which highlights only these sites. This will help to ensure that development which could have direct and/or indirect impacts to CWSs within Lowestoft consider these potential impacts from an early stage of development design in order to avoid impacts. This map and the

Comments welcome. Information about CWSs could be provided in the Supporting Document referred to above.

Prepare an additional Supporting Document which maps wildlife/ecological corridors including the role of CWSs within the network.

need to avoid direct or indirect impacts to CWSs within Lowestoft should then be highlighted within Policy LOW10 as well as LOW16. Naming these sites would also be beneficial, which the plan currently does not appear to do.		
Section 8		
<p>Section 8: Revitalising the Town Centre - This section should reference the Town Centre Masterplan; London Road Lowestoft High Street Heritage Action Zone; South Lowestoft HAZ and Seafront Masterplan; The Scores and Triangle Feasibility Study; The Powerpark Design Vision; and the North Lowestoft Heritage Action Zone Design Guide. Including reference to these in the policies would give them material weight in decision making. If there are specific elements of these which you think should be particularly followed then these can be specifically referenced.</p> <p>The addition to the plan of a policy relating the Kirkley District Shopping Centre is good. However, this section does not reference the role of the Kirkley and the seafront area in how Lowestoft functions, including how it relates to the town centre. Fig. 5 shows that people think that the beach is the best thing about Lowestoft, but this is still not adequately reflected in the neighbourhood plan.</p>	Accepted – some of these documents are referenced in para 3.10 and the missing ones will be added to this para.	Add missing documents to para 3.10
Para 8.1 - This could also include re-purposing the town centre.	Comment made previously - Not sure what 'repurposing' means in this context?	No change proposed
Para 8.10 - There are not currently direct rail links to London.	Agreed	Amend to refer to direct line to Norwich and Ipswich and indirect link to London via Ipswich or Norwich.
Para 8.11 - South Lowestoft Industrial Site should be referred to as an 'estate'.	Agreed	Change site to estate.
Para 8.21 - There is no such thing as the 'North Lowestoft HAZ Conservation Area'. This should be amended to exclude the reference to the HAZ. Apart from HAZ legacy documents, we are puzzled why the HAZ continues to be referenced here and elsewhere in the plan. The North Lowestoft HAZ ended in March and the South Lowestoft High	Agreed.	Delete 'HAZ' from the first sentence of para 8.21.

Marine Plans here as our aims are similar and support your development plans.		
LOW2		
<p>We are pleased to see this policy support the delivery of the Sustainable Urban Neighbourhood and Kirkley Waterfront Development Brief Supplementary Planning Document. This document is in the process of being revised, therefore it would be helpful for the neighbourhood plan to reflect this, perhaps by adding 'or any successor document' where appropriate.</p> <p>Changes have been made to para. 7.18 in this version of the plan but it still does not fully address the following comment which we made previously: This section lacks reference to the local plan allocation WLP2.4. It should be made very clear for readers that the WLP2.4 site allocation extends beyond the Lowestoft Neighbourhood Area and that this policy will apply only to the part of the allocation which falls within the Lowestoft neighbourhood area.</p> <p>The desire for public access to the waterfront is understandable and is a great principle. However, the Kirkley Waterfront SPD referenced above sets out that the waterfront that falls in the Parish of Lowestoft should be used for employment uses and allowing public access to quayside employment areas might create problems where the public and the employment operators mix. It is recommended that this policy is revised to add more flexibility around some of the criteria in part 2 of the policy. For example:</p> <p>2. Development should comply with the following development principles:</p> <p>a) There should be public access to the waterfront edge, provided through a combination of walkways, cycle ways, public spaces and high-quality landscape design where feasible;</p> <p>b) Spaces should be designed to encourage public and visitor use of the waterfront where feasible;</p> <p>c) The layout should prioritise pedestrian access to the waterfront edge</p>	<p>Agreed</p> <p>The Local Plan and the LNDP will together form the development plan for Lowestoft and need to be read together. There is no need to cross reference the two documents throughout.</p> <p>Noted. The policy will need to be interpreted with relevant material considerations when planning applications are determined and at that stage the practicality of public access can be considered.</p>	<p>Add '.or successor documents' at end of first sentence of clause 1.</p> <p>No change proposed.</p> <p>No change proposed.</p>

<p>where feasible and include clear sight-lines through the development; d) The waterfront (where accessible to the public) and streets and spaces should be overlooked by active frontages; Criterion 2e – what does the plan consider to be a ‘higher building’ in this location? What is considered to be a normal height building in this area? This should be explained and justified so that designers and decision-makers know how to apply this part of the policy. Public access to the waterfront areas can be provided on the development, but it is going to be more easily achieved on the parts of the site which are outside of the Lowestoft neighbourhood area. The plan should acknowledge and explain this so that readers can understand. The neighbourhood plan expressly supports economic growth in its vision and aims and the need for more employment opportunities comes through very strongly in the consultation results. Para. 6.2 states that the key challenges for the town are improving viability and attracting employment and economic growth. This policy should therefore support these aims and outcomes by supporting employment use in this important part of the quayside.</p>		
<p>You refer to the Kirkley Water Front Site, within which the East Marine Plans Policies regarding Employment (EC2) and Access (SOC1) align with your aims. We would recommend you mention the East Inshore and East Offshore Marine Plans here as our aims are similar and support your development plans.</p>	<p>Noted</p>	<p>EMPP will be referenced in para 3.10</p>
<p>Policy LOW2 is supported in principle. There is a clear focus upon creating a high-quality urban waterfront, including both residential and employment uses which is in line with Statuslist’s vision for the site. In terms of specific requirements outlined for the site in Part 2 of LOW2, it is considered that greater flexibility in policy wording would be advantageous to ensure that the scheme remains viable and can come forward in a timely manner. Whilst the development principles outlined within LOW2 are agreeable in principle, recognition of the highly constrained nature of the site is required. Flexibility should be</p>	<p>Support welcome Agreed</p>	<p>Change clause 2 to read ‘Development should <i>seek to implement</i> the following development principles:’</p>

<p>introduced across the policy to recognise the constraints of the site and to allow Statuslist to bring the site back into productive use without delay.</p> <p>Statuslist will prioritise high-quality design and layout, however the site constraints require a degree of flexibility to ensure that the scheme remains achievable. An amendment to the policy wording to amend Part 2 to read “Development should, wherever possible and unless justified, comply with the following development principles” would be fully supported.</p> <p>In light of the above, public access to the waterfront edge, as envisaged in 2(a) is not practicable given the inherent conflicts between public access and the primary objective of utilising the quayside for proposed employment use. It is envisaged that appropriate public access can be provided to the waterfront on the adjoining Brooke Peninsula and/or Riverside areas of the wider allocation to the west and east of the Former Jeld Wen Factory site respectively and linked via an appropriate Green Infrastructure and/or movement network through the site. The masterplanning of the site will also ensure attractive vistas and views of the waterfront are provided through the site, whilst ensuring the employment uses on the quayside can remain commercially attractive to operators. It is proposed that amended wording be inserted into Policy LOW2 to read “2 (a) Where possible and practicable, there should be public access to the waterfront edge...”. This revised wording would remain compatible with part (b) whereby spaces are to be designed to encourage public and visitor use of the waterfront within appropriate parts of the allocation.</p> <p>Likewise, part (c) is supported in principle. Every effort will be made to ensure attractive vistas of the waterfront are provided. Clear sightlines will be provided through the site wherever practicable in recognition of the value that blue (and green) infrastructure can have in enhancing the quality and legibility of development.</p>		
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<p>In terms of part (d) the provision of active frontages overlooking areas of public space is supported. Active frontages will be prioritised wherever possible throughout the scheme to ensure a safe environment for new residents and users.</p> <p>Parts (e) and (f) are supported in full. It is Statuslist's intention to create a high-quality scheme, influenced by the waterfront context and industrial heritage of the site.</p> <p>Supporting text at paragraph 7.19 confirms that the aim of the policy is to achieve exemplar design and create a positive symbol of the transformation of Lowestoft. The text goes on to confirm that the key to compliance with LOW2 is the creation of a new neighbourhood with an accessible and vibrant waterfront. Both of these supporting statements are wholly supported, and the ambition for the site is shared by Statuslist.</p>	<p>Agreed</p>	<p>Amend the first part of clause 2a as proposed.</p>
<p>LOW3</p>		
<p>The legend is missing from fig. 12.</p> <p>The red outline for the town centre in the north of the town is very large. How has this area been selected? It takes in areas to the north in excess of that identified by policy WLP8.18 such as Whapload Road – is there something specific you wish to achieve in this area? Whilst this area has a role to play for employment purposes it is questionable if it constitutes part of the town centre. There is the potential for two separate town centre boundaries to cause confusion.</p> <p>Bullet 2 – This still appears to take a tougher stance than the NPPF, paras 200-204. It still states that development that causes harm to a listed building will normally be refused and development that causes unacceptable harm to an NDHA will normally be refused. It also appears to offer a higher level of protection to non-designated heritage assets than to Listed buildings, where it states that ‘...the loss or harm to listed buildings will normally be refused...’ but that to non-designated heritage assets ‘...will be refused...’ It might also be better to use a</p>	<p>Agreed</p> <p>See response to first Reg 14 Consultation :</p> <p>‘The Town Centre follows the combined boundaries of WLP8.18 – Town Centre – and WLP 2.9 – Historic Town Centre. The criteria in Policy LOW3 are relevant to these areas’</p> <p>Agreed</p>	<p>Add Legend to Fig12</p> <p>No change proposed</p> <p>Amend LOW3 clause 2 to state:</p>

<p>phrase such as ‘will not be supported.’</p> <p>Bullet 3 – this should take account of amenity issues created by some uses which may make residential uses unsuitable, thereby generating conflicting uses. For example, creating flats above a bar or other late-night establishment is likely to generate noise nuisance complaints.</p> <p>Bullet 4 – The reference to the North Lowestoft HAZ Design Guide is very useful. However, perhaps more needs to be said about the impacts of high-rise buildings in an otherwise low-rise area.</p> <p>Bullet 5 – support for the re-use and refurbishment of Listed Buildings is good. The requirement to preserve the buildings and their settings and preserve or enhance the character or appearance or special architectural or historic interest of the area is quite a high bar however. It’s especially high when applying it to buildings of architectural, historic or visual interest, which could capture a broad range of buildings. Some flexibility in this regard would be sensible.</p> <p>Bullet 7 – Refers to town centre uses, including use classes E and F1. It would be worth defining what other uses are classed as town centre uses. Is the policy restricting the class E uses to those listed? Some class E uses such as light industrial may not be desirable in some parts of the town centre. Some clarity on this point would be helpful.</p> <p>The Town Centre Masterplan should be referenced. This details zones</p>	<p>Agreed</p> <p>The rationale for this suggestion is not clear.</p>	<p>‘Redevelopment of buildings will normally be supported. Proposals that lead to the loss of or substantial harm to listed buildings and non designated heritage assets in the Conservation Area will be refused if the proposal has an unacceptable effect on the architectural, historic or visual interest of the Area.’</p> <p>Amend LOW3 clause 3 by adding ‘normally’ between ‘will’ and ‘be’ Add reference to this in para 8.15.</p>
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<p>in the town centre which will be of relevance here. Bullet 3 potentially works against the Town Centre Masterplan which identifies zones which would be best suited to residential development. We would support the Town Centre Masterplan recommendations being incorporated into this policy.</p>	<p>Seek further clarification</p>	
<p>You refer to the Town Centre and Historic High Street within which the East Marine Plans Policies relating to Economy (EC1), Employment (EC2), Tourism (TR3), and Renewable energy (EC3) align with your aims. We would recommend you mention the East Inshore and East Offshore Marine Plans here as our aims are similar and support your development plans.</p>	<p>See previous responses</p>	<p>Add reference to the EMPP in para 3.10</p>
<p>LOW4</p>		
<p>These two policies cover the South Lowestoft Area, (that is, London Road South Area and the South Lowestoft Conservation Area), which are located slightly remote from the nearest Strategic Road Network (SRN). In addition, the LOW14 policy relates to the characteristics, appearance, and special architectural characteristics, which are unlikely to have any severe impact on the Strategic Road Network (SRN). Therefore, National Highways does not have any comment on those two new policies (LOW4 and LOW14).</p>	<p>Noted</p>	<p>No change required</p>
<p>Bullet 1 – it is not clear what is meant by ‘...causes harm to vitality and attractiveness...’ what is the policy seeking to protect? Greater clarity and precision are required here so that a decision-maker will understand how to apply this part of the policy.</p> <p>Bullet 2 – Resistance to demolition of listed buildings and buildings in a Conservation Area may be too inflexible. It ignores the planning balance that is needed.</p>	<p>As a facility for visitors and the local community</p> <p>See above re Town centre and listed buildings and non designated assets – not consistent</p> <p>See above re Town Centre – add normally?</p>	<p>No change proposed</p>

<p>Bullet 3 – care is needed in supporting residential units above unneighbourly uses eg. Bars and late-night establishments. This may generate conflict in uses and statutory nuisance complaints.</p> <p>Bullet 4 – upwards extensions need to be considered carefully in an otherwise low-rise area.</p> <p>Bullet 5 – support for the re-use and refurbishment of Listed Buildings is good. The requirement to preserve the buildings and their settings and preserve or enhance the character or appearance or special architectural or historic interest of the area is quite a high bar however. It’s especially high when applying it to buildings of architectural, historic or visual interest, which could capture a broad range of buildings. Some flexibility in this regard would be sensible.</p> <p>Bullet 6 – this should be strengthened: ‘Conditions relating to the hours of operation of uses maywill be considered where necessary to protect residential amenity.’</p>	<p>Also see TC</p> <p>Agreed</p>	<p>Change ‘may be’ to ‘will be’</p>
<p>LOW5</p>		
<p>Specifically, Policy 8.21 concerning the land owned by East Suffolk Council to the west of the Town Hall.</p> <p>East Suffolk Council objects to this proposal as written and specifically the condition as set-out that this land is used only for ‘parking and servicing space’ in conjunction with the Town Hall redevelopment.</p> <p>East Suffolk Council hold a planning consent allowing development of this site for a commercial use and this proposal is directly at odds with that and this would therefore negatively impact our land holding.</p> <p>East Suffolk Council will be prepared and has said it is willing to develop its land adjacent to the Old Town Hall in a way that is sympathetic to the setting and the proximity of the Town Hall, but can’t be conditioned in the LNP to one or two narrow uses only.</p>	<p>Policy LOW5 does not require the land owned by ESC only to be used for parking and servicing. However the policy could be reworded to better reflect the objectives of both Councils</p>	<p>Replace Policy LOW5 clauses 3 and 4 with: ‘The development of a high quality scheme on land to the west of the Town Hall should as far as possible include elements that will support activities in the whole site such as car parking and servicing.’</p> <p>Discuss with ESC</p>

<p>A large portion of this site allocation within the red outline is owned by East Suffolk Council. East Suffolk Council request that further detail is provided on the envisaged use of this land or that this portion of land is removed from the allocation. Lowestoft Town Council has been advised that East Suffolk Council is not supportive of restricting land in their ownership to car parking.</p> <p>Any site allocation in the neighbourhood plan should be deliverable. If there is no prospect of the allocated land coming forward as set out in the plan then the policy is not deliverable and should be re-considered.</p> <p>Bullet 1 – what is meant by ‘enterprise space’ and ‘knowledge-based businesses? These terms should be clarified.</p> <p>Bullet 3 – this refers to land adjacent to the town hall being used for parking, servicing and other uses connected to the building. Is this adjacent land restricted to the land in the red outline or is the policy referring to other land too? This should be made clear in the policy. If it applies to all land in the red outline then the Town Council should establish agreement with the landowners involved. This should consider other forms of development to the site, in line with LOW15.</p> <p>Bullet 4 – as pointed out above, land to the west of the Town Hall is not in the Town Council’s ownership. Requiring this land to serve the needs of the Town Hall site without the agreement of the landowner will make this policy undeliverable. This part of the policy therefore needs re-writing to remove this undeliverable requirement.</p> <p>Further commentary around the findings of the public consultation would be interesting/helpful.</p>	<p>These comments were previously submitted to the original S14 consultation. See proposed amendment above.</p> <p>Agreed – refer to use classes</p> <p>Is it normal for a planning policy only to be acceptable with the approval of the landowner?</p>	<p>Add to LOW5 clause 1 – ‘...activities <i>within Use Class E.</i>’</p>
<p>LOW6</p>		
<p>Typo: ‘...supported and in...’</p>	<p>? there is no ‘and’</p>	<p>No change needed</p>

<p>Criterion b – there may be some shops and commercial uses where locating residential properties above them would not be appropriate. This is mentioned in 9.15 but does not seem to make it into the policy. This criterion could incorporate an exception where residential uses would be incompatible with the commercial use.</p> <p>There are some parts of Lowestoft where conversions of buildings to flats or houses in multiple occupation will not be permitted by local plan policy WLP8.4. Criterion d) of this policy could be read to support this type of re-development. It is recommended that this policy is modified so that it does not support creation of flats or houses in multiple occupation in the identified areas.</p>	<p>The term ‘mutual compatibility between uses’ covers this.</p> <p>The two Plans have to be read together</p>	<p>No change proposed</p> <p>No change is proposed</p>
LOW7		
<p>The Town Council should ensure that the landowner has been adequately consulted with respect to this policy.</p>	<p>It has been</p>	<p>No change proposed</p>
LOW8		
<p>Has any evidence been gathered to support the implementation of the M4(3) and National Space Standards? East Suffolk Council would support the implementation of these standards but this should be clearly evidenced. If challenged in the examination they could be removed from the policy if not evidenced.</p>	<p>Support welcome</p>	<p>No change proposed</p>
<p>Policy LOW8 is supported. In respect of Part 1 of LOW8 it is the intension to deliver a scheme which provides a range of housing types and tenures to ensure a choice of residential accommodation and to create a missed and balanced</p>	<p>Support welcome</p>	<p>No change proposed</p>

<p>community. Flexibility will inevitably be required to ensure a that a viable scheme can come forward to deliver these significant benefits.</p> <p>The aim for affordable housing (where there is an affordable housing requirement) to be provided as an integral part of a scheme and as tenure blind is supported as necessary to ensure mixed and balanced communities can be achieved in line with the objectives of the National Planning Policy Framework. Likewise, the requirement for positive design and landscape features to reduce carbon emissions and promote biodiversity is supported.</p> <p>Part 4 of LOW8 requires developments to meet or exceed national space standards, which is supported where feasible.</p>		
<p>Section 10: Environment and Place</p>		
<p>Para 10.10 - This should reflect that Lowestoft is zero rated for CIL and therefore will not get a neighbourhood share of CIL payments. However, it will be possible for bids to be made for CIL funding from the district pot.</p>	<p>Agreed – the para refers to the district pot</p>	<p>No change proposed</p>
<p>Para 10.23 - This states ‘... so that the public realm is not dominated.’ It is assumed that it means dominated by parking, but this needs to be made explicit. It would also be worth the text referring to the Suffolk Parking Standards.</p>	<p>Agreed</p>	<p>Add ‘by parking’ at the end of the first sentence of para 10.23</p>
<p>Para 10.26 - The plan could usefully reference East Suffolk’s Sustainable Construction SPD here: https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Sustainable-Construction-2022/FINAL-Sustainable-Construction-SPD.pdf</p>	<p>Agreed</p>	<p>Add reference to the SPD to the list of relevant documents in para 3.10</p>
<p>LOW9</p>		
<p>The general approach to design taken by this policy is good and is supported.</p> <p>Guidance or explanation of what is considered to be locally distinctive would be very helpful.</p>	<p>Support welcome</p>	<p>No change proposed</p>

<p>One element of design that has been receiving some attention recently is the design of parking. While the policy does address this, there could be opportunities to strengthen this to ensure parking is designed in a way that promotes its integration into development and the natural environment further. For example, encouraging planting in car parking areas could help reduce their impact.</p> <p>5 – The highway hierarchy is important here. Reference could also be made to cycling and public transport with further reference to the East Suffolk Cycling and Walking Strategy.</p>	<p>Agreed</p>	<p>Add reference to the Strategy to Para 3.10</p>
<p>The new Environment Act 2021 requires development proposals to achieve a minimum 10% net gain in biodiversity; whilst not yet required in law, this level is already being implemented as good practice across the country and is well referenced within the plan which includes reference to this national minimum level, which will be required on most developments from early 2024.</p> <p>The Wildlife Trusts, as well as other organisations, are advocating for 20% Biodiversity Net Gain (BNG) where this is possible and setting an aspiration for achieving a higher percentage of net gain could help to ensure that the biodiversity assets of Lowestoft are conserved and enhanced for future generations. Suffolk County Council’s recent commitment to ‘deliver a further 10% biodiversity net gain in aggregate across the housing programme, in addition to the 10% biodiversity net gain that will be required on each site.’, suggests that it is reasonable to include this aspiration within the Lowestoft Neighbourhood Plan. West Suffolk also consider a greater than 10% requirement for BNG in their recent preferred options consultation on their Local Plan.</p>	<p>See policy LOW10 and the strengthening of that policy proposed above</p>	<p>No change proposed</p>

<p>There are further examples of district councils outside of Suffolk requiring more ambitious BNG requirements within their Local Plans and these have been evidenced with viability studies. For example, Swale Borough Council completed a viability study and found that doubling the percentage of biodiversity net gain from 10% to 20% increased the cost of delivery by just 19%, so then included a minimum 20% BNG requirement in their local plan. The Greater Cambridge Draft Local Plan also includes a requirement for a minimum 20% BNG. Policy LOW9 could include a statement in support of development where 20% BNG can be demonstrated in Lowestoft. Delivering 20% BNG ensures there is more certainty that a significant and meaningful uplift in biodiversity will be achieved, which will help protect the high-quality biodiversity assets and ecological networks within Lowestoft.</p>		
<p>LOW10</p>		
<p>The Council supports the protection of the natural environment and the encouragement to provide Biodiversity Net gain on new development.</p> <p>Criterion 2 provides support for a coordinated approach to the delivery of green infrastructure. The Council would encourage that this is expanded to support the provision of biodiversity and green infrastructure that is connected throughout development sites. Isolated 'islands' of habitats should not be encouraged as these do provide great benefits to wildlife. This criterion is unlikely to be effectively applied to small scale development such as householder development or small numbers of homes. It is suggested that this applies only to major development (e.g. 10 dwellings and over) or text is added to say: "as appropriate to their scale, nature and location, development sites should...".</p> <p>Also, the Council would support greater encouragement for small scale natural environment improvements such as hedgehog highways, swift bricks and bird boxes. This is something that is encouraged in the National Design Code and would be supported by the Council.</p>	<p>Support welcome</p> <p>Could be covered in new supporting document (see above)</p>	

<p>An outline of an expected masterplanning process is set out in Appendix 7 of East Suffolk Council’s Statement of Community Involvement (https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Statement-of-Community-Involvement/Statement-of-Community-Involvement.pdf). You might find it helpful to incorporate this to establish expectations from a masterplanning process.</p> <p>The plan could support or require details of management strategies of urban space/green infrastructure to help ensure their long-term stewardship.</p>		
<p>You refer to Green Infrastructure, Urband Green Spcaes and Biodiversity, which aligns with the East Marine Plans Policies relating to Biodiveristy (BIO), Economy (EC1) and Infrastructure (GOV1). We would recommend you mention the East Inshore and East Offshore Marine Plans here as our aims are similar and support your development plans.</p>	Noted	Refer to EIEOMP in para 3.10
LOW11		
<p>This policy states, “Appropriate development in Lowestoft will be expected to contribute to the infrastructure requirements for the Town in accordance with the Lowestoft Infrastructure Plan”. With this LOW11 Infrastructure policy which may relate to the existing Strategic Road Network’s assets, National Highways will be interested to receive consultation on any improvements, amendments, or additions to any future Lowestoft’s A47 Road and Highways infrastructure proposal. As mentioned in our last response once adopted, the Neighbourhood Plan will become a material consideration in the determination of planning applications. Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact on the SRN of a planning application accordingly.</p>	Noted	No change needed
<p>It’s not clear how the policy is intended to be applied. Lowestoft is zero rated for CIL therefore development can not contribute in this way. Large schemes would involve a Section 106 agreement which can</p>	Discuss with ESC	

<p>secure delivery of infrastructure where required, but the policy is written for all development. How will these contributions be made?</p> <p>The policy doesn't seem to be written in a way that can be applied in the determination of planning applications. Greater clarity and precision are needed for this policy, or perhaps it should be downgraded to a community action or aspiration.</p> <p>This section should note in the supporting text that Lowestoft is nil rated for CIL so its development won't directly accrue CIL to be spent in town. However, this doesn't mean it cannot receive funding from the district pot.</p> <p>It is good that you have an Infrastructure Plan and you have referenced here. A link should be provided to the Lowestoft Infrastructure Plan. Can you provide information about what it contains? Some examples perhaps? How do these tie in with the aims and objectives of the neighbourhood plan.</p>		
<p>You refer to appropriate infrastructure, which aligns with our Infrastructure policy (GOV1). We would recommend you mention the East Inshore and East Offshore Marine Plans here as our aims are similar and support your development plans.</p>	<p>Noted</p>	<p>Add EIEOMP to para 3.10</p>
<p>LOW12</p>		
<p>Are there any further examples of improvements or environmental impacts that could be added? The policy wording is vague and this would help designers and decision-makers effectively apply the policy.</p>	<p>Policies should not reference examples</p>	<p>No change proposed</p>

<p>This policy covers the northern shore of Lake Lothing, as well as the outer harbour. As such it covers the same land as several Local Plan allocations: WLP2.10 (Inner Harbour Port Area), WLP2.3 (Peto Square), WLP8.18 (New Town Centre Use Development) and WLP2.2 (Power Park). These policies should be referenced.</p> <p>The Town Council should ensure that the Association of British Ports and any other landowners whose land is covered by the red outline have been adequately consulted.</p>	<p>The plans are read together as the development plan and should not need to be cross referenced throughout</p> <p>They have been</p>	
<p>You refer to Port Development, which aligns with the boundary of the East Marine Plans, we would therefore recommend you mention the East Inshore and East Offshore Marine Plans here as our aims are similar and support your development plans. Inclusion of the policies relating to Biodiversity (BIO), Infrastructure (GOV1) and Ports and Shipping (PS) will further support your aims.</p>	<p>Noted</p>	<p>Add EMPs to para 3.10</p>
<p>LOW13</p>		
<p>Figure 17 – The Conservation area should be drawn as per the boundary shown in the North Lowestoft Conservation Area Appraisal. East Suffolk Council’s Planning Policy and Delivery team can assist with this if required.</p> <p>The North Lowestoft Heritage Action Zone and Conservation Area Appraisal should be referenced.</p>	<p>Check boundary with ESC</p>	<p>Add NLCAA and NLHAZ to para 3.10</p>
<p>LOW14</p>		
<p>These two policies cover the South Lowestoft Area, (that is, London Road South Area and the South Lowestoft Conservation Area), which are located slightly remote from the nearest Strategic Road Network (SRN). In addition, the LOW14 policy relates to the characteristics, appearance, and special architectural characteristics, which are unlikely to have any severe impact on the Strategic Road Network (SRN). Therefore, National Highways does not have any comment on those two new policies (LOW4 and LOW14).</p>	<p>Noted</p>	<p>No change needed</p>

<p>This depicts the South Lowestoft Conservation Area Boundary. However, there are significant differences between the boundary as shown and that in the Conservation Area Appraisal. In particular, the section along the railway line, Claremont Pier and part of the area to the south of Kensington Gardens have been excluded from the map in the Lowestoft Neighbourhood Plan version.</p> <p>We welcome policy text which encourages contemporary design. The term 'green design' should be explained. A phrase such as 'sustainable development' may be better.</p>	<p>Check boundary with ESC</p> <p>Agreed</p>	<p>????/</p> <p>Change 'green design' to 'sustainable development'</p>
<p>LOW15</p>		
<p>It seems very likely in a town of Lowestoft's size that there are other assets which could be protected as Non-Designated Heritage Assets. We would encourage you to do so. The Waveney Local Plan at Appendix 6 contains criteria that can be used to identify them.</p> <p>Bullet 1 - Below ground non-designated heritage would be better referred to as archaeology, so that it is consistent with the terminology of the Local Plan. The subject of protecting archaeological content may already be adequately covered by Local Plan policy WLP8.40 (Archaeology).</p> <p>Bullet 2 - It may be worth providing a bit of historic context and explaining why the pier is so important. The supporting text could capture this. There is also no mention of Claremont Pier, which is also a significant feature of the townscape (a point raised in comments in September 2022).</p>	<p>NDHA could be identified in a Supporting Document</p> <p>Agreed</p> <p>Picks out most important NDHA</p>	<p>Create Supporting Document on Listed Buildings and Non-Designated Heritage Assets (or reference appropriate documents)</p> <p>Amend 'below ground heritage asset' to 'archaeology'</p> <p>No change proposed</p>

LOW16		
<p>This policy covers a large area made up of smaller green spaces. The reasoning for allocating such a large area as a single 'strategic green landscape' should be clearly set out. Some of these spaces do not relate strongly to one another which does not support the protection of this as a single landscape. As part of this reference should be made to 'Supporting Document 3 – Protecting Open Landscapes, Sports Fields and Local Green Spaces.'</p> <p>Substantial parts of this green space are protected as open space under Local Plan policy WLP8.23 which should be clearly identified.</p> <p>East Suffolk Council owns land within this allocation which has previously been used for leisure uses. The policy should allow for sensitively designed leisure or tourism development to take place that complements the character and openness of the landscape.</p>	<p>No its a single area – the reasoning is set out</p> <p>The plans are read together as the development plan and do not need to be cross referenced. It is difficult to understand if ESC is putting forward planning arguments or arguments to support its interests as landowner. Discuss with ESC.</p>	<p>No change proposed</p> <p>No change proposed</p> <p>No change proposed</p>
<p>Para 10.42 - This talks about the impact of development on "the area as a whole". However the identified area is quite disjointed and some of the areas do not relate well to one another, therefore in many cases it would not be possible to experience the area as a whole and development could easily affect one part of the designation whilst having no impact at all on others. As such it does not seem appropriate to discuss impacts on the area as a single whole landscape. As much of the identified area is quite different in form and function it may work better to break it up into several smaller areas.</p>	<p>The policy identifies a single area. The para simply notes that there are a number of important areas within the whole area.</p>	<p>No change proposed</p>

Fig 20 and 21 – The numbering needs updating following the deletion of LGS15	Agreed	Renumber LGS
You refer to Strategic Green Lanscapes which aligns with the East Marine Plans Policies relating to Biodiversity (BIO). We would therefore recommend you mention the East Inshore and East Offshore Marine Plans here as our aims are similar and support your development plans.	Noted	Add EMPP to para 3.10
LOW17		
The plan should explain what is meant by ‘exceptional circumstances’.	It means exceptional circumstances	No change proposed
You refer to Local Green Spaces which aligns with the East Marine Plans Policies relating to Biodiversity (BIO). We would therefore recommend you mention the East Inshore and East Offshore Marine Plans here as our aims are similar and support your development plans.	Noted	Add EMPP to para 3.10
LOW18		
Supporting text: should reference Local Plan open space designations. The Playing Pitch and Outdoor Sports Facilities Assessment also provides useful information about the demand for and supply of sports pitches and other facilities in Lowestoft and this should be referenced. RSS7 is not a formal recreational or sports space so should be removed.	Both plans are read together as the development plan and do not need cross referencing It has already been removed	Add PPOSFA to para 3.10 No change needed
LOW19		
This policy sets out some good objectives and useful design criteria. The East Suffolk Cycling and Walking Strategy has now been adopted and is important context. It would be useful to reference it within the policy. If there are elements of it you wish to directly support then you could include these directly in your policies which would give it specific planning weight in decision-making. Para 11.16 - This states that “...development without adequate provision will become unviable in a relatively short period of time.” Is ‘unviable’ the best term to use here? This is normally reserved for	Support welcome	Add the ESCWS to para 3.10

financial viability when used in planning documents so if this does not relate purely to financial viability then an alternative term would be better here. Perhaps 'unattractive', or 'undesirable' instead?	Agreed	Change 'viable' to 'out-dated'
Land North of Waveney Drive (Former Jeld Wen Factory site) is sustainably located within walking and cycling distance of key amenities in Lowestoft, including public transport, health services, schools, and employment. Statuslist supports the policy LOW19's aim of reducing the impact of development upon the local road network. Accordingly, a future application for the site will be accompanied by a Travel Plan to identify measures to encourage the use of sustainable modes of travel.	Support welcome	No changed needed
LOW20		
How is a 'local energy scheme' defined? Is it below a certain generation capacity? Does it pertain to a certain physical size of structure? This should be made clear so that the policy can be effectively applied. The planning rationale section on p.59 discusses development related to the renewable energy sector – is this included in local energy schemes?	Defined in para 129 Page 59?	No change proposed
You refer to Local energy Schemes, which is supported by the East Marine Plans Policies for renewable energy (EC3). We would therefore recommend you mention the East Inshore and East Offshore Marine Plans here as our aims are similar and support your development plans.	Noted	Add EMPP to list of relevant strategies in para 3.10