

**Consultation Document and Proposed Response: Western end of Lake  
Lothing Concept Statement – Waveney District Council**  
Report by Planning Policy Officer

<b>Summary:</b>	The western end of Lake Lothing Concept Statement has been produced by Waveney District Council. It seeks to influence and guide development in this area to enable delivery of the aims of the Lake Lothing and Outer Harbour Area Action Plan.
<b>Recommendation:</b>	That the proposed comments are endorsed for submission to Waveney District Council.

## **1 Introduction**

- 1.1 Waveney District Council are consulting on a draft Western End of Lake Lothing Concept Statement (Appendix A).
- 1.2 The Concept Statement is intended to guide developers in drawing up proposals for development within the Western End of Lake Lothing and will be used as a framework for assessing planning applications in the site.
- 1.3 The Concept Statement will be adopted as a Supplementary Planning Guidance. The NPPF at paragraph 153 says '*supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development*'. The Concept Statement will support and expand Policy SP6 of the Lowestoft Lake Lothing and Outer Harbour Area Action Plan<sup>1</sup> (adopted in 2012).
- 1.4 The adopted Lowestoft Lake Lothing and Outer Harbour Area Action Plan helps to guide development in the area surrounding Lake Lothing and the Outer Harbour in Lowestoft. The plan supports the creation of jobs, particularly in the energy sector, new homes, improved pedestrian, cycle and vehicle links, flood risk management measures and better connections to the waterfront.

## **2 Proposed Response**

- 2.1 The proposed response is set out in Appendix B.
- 2.2 The Western End of Lake Lothing is adjacent to the Broads Authority Executive Area. Development in this area can have the potential to impact on

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<sup>1</sup> <http://www.waveney.gov.uk/areaactionplan>

or provide benefits and enhancements to the setting and use of the Broads in this area.

2.3 The comments cover views of the Planning Policy, Development Management, Heritage and Access and Recreation Officers of the Broads Authority.

2.4 The consultation ends at the end of 4 December 2015.

### **3 Financial Implications**

3.1 There are no financial implications other than officer time in responding to this consultation.

### **4 Conclusion**

4.1 The Broads Authority welcomes appropriate development and change in this area and supports the principle of a Concept Statement. The Authority does have comments on the content of the Concept Statement. It is recommended that these comments are submitted to Waveney District Council for their consideration.

Background papers: None

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Date of report: 18 November 2015

Appendices: **APPENDIX A:** Western End of Lake Lothing Concept Statement  
[http://www.waveney.gov.uk/site/scripts/download\\_info.php?downloadID=1817](http://www.waveney.gov.uk/site/scripts/download_info.php?downloadID=1817)

**APPENDIX B:** Proposed Broads Authority representations to the consultation on the Western End of Lake Lothing Concept Statement

**Proposed Broads Authority representations to the consultation on the Western  
End of Lake Lothing Concept Statement**

The Broads Authority welcomes appropriate development and change in this area of Lowestoft and supports the principle of a Concept Statement. The Authority does have comments on the content of the Concept Statement.

It is important to note that this area is adjacent to the Broads Authority Executive Area and therefore has the potential to impact, benefit or enhance the Broads in this area. Furthermore, the interface with the water in this area also has the potential to enhance and benefit the Broads and enable more people to safely enjoy the water in this area.

In general a water based management plan would be of benefit, which discusses the interaction between the land and water. For example moorings, launching facilities, opportunities for water based businesses such as hire boats as well as providing an area for the proposed water taxi to use.

Map on page 1

- Show the Broads Authority Executive Area and the Oulton Broads Conservation Area. This information is important in setting the context for the Concept Statement as they are strengths of the area which can be enhanced but need acknowledging.

Section 2 – Site Context

- The interface with the water is not mentioned. The maps seem to show jetties, quays or moorings. It is recommended that these issues are discussed. The Lowestoft Lake Lothing and Outer Harbour Area Action Plan seeks better connections with the waterfront. The waterfront is a strong asset for this area. The water in this area provides access to the Broads.

Page 4

- Bullet 6 – not only employment use but recreational access as well. The water in this area provides access to the Broads. The bullet point refers to ‘potential’ but there could be merit in being more detailed in what could take place.

Page 5

- Bullet 10 – this planning permission is mentioned throughout the document. Does there need to be more detail provided regarding the scheme?
- Bullet 14 – what about the impact of flooding elsewhere as a result of protecting new development from flooding in this area? Protecting from flooding in one area can cause problems elsewhere.
- There used to be many paths to viewing points on the waterfront. Is there scope to re-introduce such paths and viewing points?
- Other constraints and/or opportunities not included in section 3 are as follows. These aspects should be addressed in this section as they are important local

considerations that change in this area should consider and address. Heritage for example does not seem to be mentioned until page 11 of the document.

- Archaeology
- Conservation Area
- Biodiversity
- The Broads being a member of the National Park.

#### Flood Risk section page 5

- Should tidal and surface flooding be considered in this section as well? Details can be found at the 'what's in your backyard' website. These sources of flooding seem relevant for the area and their mention seems appropriate.
- Paragraph 3.4 is confusing as written and could usefully be clarified. Is there potential for contradiction as well as flood risk an issue but as residential is already granted, such a land use is acceptable in this area.

#### Page 7

- Pedestrian and cycling network: is there a strategic walking and cycling study for this area that this aspect of the Concept Statement can link to? A pedestrian and cycle link would improve access from Lowestoft to Oulton Broad and then to the Broads so would be of great value. This route could be signed or new paths provided.
- Road improvements: third sentence could benefit from stronger wording than terms like 'should' and 'encourage' if the walking and cycling benefits are to be realised.

#### Page 8

- Paragraph 5.7: The Authority would prefer a route over the railway at this point.
- Paragraph 5.9: With regards to the noise issue, how does this relate to the site being next to a railway?
- Paragraph 5.10: The issue of flood risk elsewhere needs to be considered.

#### Page 9

- Are there views into and out of the Broads as well as the Conservation Area that should be identified?

#### Zones section

- How do the zones relate to figure 4.1 on page 6? And how does figure 6.1 on page 15 relate to the zones and figure 4.1?
- Zone 2 – there is no mention of the use of the water and access to the water.
- Paragraphs 5.20 and 5.24 – reference to the wooden buildings at Southwold Harbour – this image is not on page 12.
- Illustration 5.21 is not clear in what it is showing. Is there scope for annotation?
- This area provides the opportunity to redevelop and regenerate a waterside area. The setting and opportunity for change seems unique. As such the Authority emphasises the importance of development using the water, facing the water and making use of the waterside setting. The water can be the focus for development in this area and is a great asset to this site, but the document seems to lack relationship with the water. For example the artist's impression under 5.24 seems to show that the development has turned its back on the water.

- 5.27 – how will garages and carports lessen the impact of flooding? They will also reduce the impact of cars on the function of the road.
- 5.30 – is there scope for themed play areas? Can the open space be linked throughout the site? Is there scope for more well designed and well sites open space?
- There seems great scope for heritage interpretation. See Norwich City's draft SPD<sup>2</sup> for some examples.

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<sup>2</sup> <http://www.norwich.gov.uk/YourCouncil/Consultations/Pages/HeritageInterpretationSPDConsultation.aspx>