

# East Suffolk House, Riduna Park, Station Road, Melton, Woodbridge, IP12 1RT

# **Cabinet**

#### Members:

Councillor Steve Gallant (Leader)

Councillor Craig Rivett (Deputy Leader and Economic Development)

Councillor Norman Brooks (Transport)

Councillor Stephen Burroughes (Customer Services and Operational Partnerships)

Councillor Maurice Cook (Resources)

Councillor Richard Kerry (Housing)

Councillor James Mallinder (The Environment)

Councillor David Ritchie (Planning & Coastal Management)

Councillor Mary Rudd (Community Health)

Councillor Letitia Smith (Communities, Leisure and Tourism)

Members are invited to a **Meeting of the Cabinet** to be held on **Wednesday 6 May 2020** at **3.00 pm** 

This meeting will be conducted remotely, pursuant to the Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of Local Authority and Police and Crime Panel Meetings) (England and Wales) Regulations 2020.

The meeting will be facilitated using the Zoom video conferencing system and broadcast via the East Suffolk Council YouTube channel at <a href="https://youtu.be/KujoYKJthYU">https://youtu.be/KujoYKJthYU</a>.

An Agenda is set out below.

Part One - Open to the Public

3 - 22

#### 1 Apologies for Absence

To receive apologies for absence, if any.

#### 2 Declarations of Interest

Members and Officers are invited to make any declarations of Disclosable Pecuniary or Local Non-Pecuniary Interests that they may have in relation to items on the Agenda and are also reminded to make any declarations at any stage during the Meeting if it becomes apparent that this may be required when a particular item or issue is considered.

#### 3 Announcements

To receive any announcements.

#### 4 Minutes 1 - 2

To confirm as a correct record the Minutes of the Meeting held on 7 April 2020

#### **KEY DECISIONS**

#### 5 Housing Enabling Strategy ES/0367

Report of the Cabinet Members with responsibility for Housing and Planning & Coastal Management, respectively

#### **NON-KEY DECISIONS**

## Adoption of North Lowestoft Heritage Action Zone Design Guide 23 - 230 Supplementary Planning Document ES/0366

Report of the Cabinet Member with responsibility for Planning and Coastal Management

# 7 East Suffolk Performance Report - Quarterly Performance Quarter 231 - 257 4 (2019/20) ES/0368

Report of the Leader of the Council

# 8 Acknowledgement of the Declaration of Climate Change and Impact on Housing ES/0369

Report of the Cabinet Member with responsibility for Housing

#### 9 Exempt/Confidential Items

It is recommended that under Section 100A(4) of the Local Government Act 1972 (as amended) the public be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in Paragraphs 1 and 3 of Part 1 of Schedule 12A of the Act.

#### Part Two - Exempt/Confidential

258 - 266

#### 10 Exempt Minutes

- Information relating to any individual.
- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

#### Close

Stephen Baker, Chief Executive

#### Filming, Videoing, Photography and Audio Recording at Council Meetings

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#### **Unconfirmed**



Minutes of a Meeting of the **Cabinet** held via Skype Conference Call on **Tuesday, 7 April 2020** at **6.30** pm

#### **Members of the Cabinet present:**

Councillor Steve Gallant, Councillor Richard Kerry, Councillor James Mallinder, Councillor Craig Rivett, Councillor Letitia Smith

#### **Other Members present:**

Councillor Peter Byatt, Councillor Graham Elliott

#### Officers present:

Stephen Baker (Chief Executive), Karen Cook (Democratic Services Manager)

#### 1 Apologies for Absence

It was reported that no apologies had been received because due to the restrictions imposed by the COVID-19 pandemic it had been agreed that only five of the 10 Cabinet Members would be in attendance to action the business which required their attention.

#### 2 Declarations of Interest

Councillor Byatt declared Local Non Pecuniary Interests in respect of agenda items 7, 8 and 9, as the Ward Member for Kirkley.

#### 3 Announcements

There were no announcements.

#### 4 Minutes - 4 February 2020

#### **RESOLVED**

That the Minutes of the Meeting held on 4 February 2020 be confirmed as a correct record and signed by the Chairman.

#### 5 Minutes - 3 March 2020

#### **RESOLVED**

That the Minutes of the Meeting held on 3 March 2020 be confirmed as a correct record and signed by the Chairman.

#### 6 Exempt/Confidential Items

#### **RESOLVED**

That, under Section 100(a)(4) of the Local Government Act 1972 (as amended), the public be excluded from the meeting for the following items of business on the grounds that they involved the likely disclosure of exempt information as defined in Paragraph 3 of Part 1 of Schedule 12A of the Act.

#### 7 Refurbishment and Repurposing Proposal for East Point Pavilion, Lowestoft

- Information relating to any individual.
- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

#### 8 Claremont Pier, Lowestoft - Surrender and Renewal of Head Lease

- Information relating to any individual.
- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

#### 9 Cliff Stabilisation Works at Jubilee Parade, Lowestoft

- Information relating to any individual.
- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

#### 10 Exempt Minutes - 4 February 2020

- Information relating to any individual.
- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

#### 11 Exempt Minutes - 3 March 2020

- Information relating to any individual.
- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

The meeting concluded	at 7.00 pm
	Chairman



#### **CABINET**

Wednesday 6 May 2020

#### HOUSING ENABLING STRATEGY

#### **EXECUTIVE SUMMARY**

- 1. The Council has, over recent years, committed itself to developing new housing (including new Council housing) in the district and various strategies have been adopted by the Council to support this.
- 2. This Housing Enabling Strategy has been written to clearly state the Council's role in encouraging, supporting and enabling new housing development in the district in cooperation with small and large scale developers, local communities, Registered Providers, as well as the Council's own Housing Development Team. It sets out specific actions to take forward between 2020 2025.
- 3. The Strategy is closely aligned to the Council's current Local Plans and Housing Action Plan together with existing adopted strategies and addresses sustainable housebuilding in recognition of the Council's declared climate emergency.

Is the report Open or Exempt?	Open
Wards Affected:	All
Cabinet Members:	Cllr Richard Kerry, Cabinet Member with responsibility for Housing and Cllr David Ritchie, Cabinet Member with responsibility for Planning & Coastal Management

Supporting Officer:	David Howson
	Housing Strategy Manager
	01502 523146
	dave.howson@eastsuffolk.gov.uk

#### 1 INTRODUCTION

- 1.1 This Housing Enabling Strategy is the first of its kind for East Suffolk and recognises the importance of the Council's role in enabling housing development in the district to address the unmet need for new homes in the area across a range of tenures. It covers a five-year period to 2025.
- 1.2 It is recognised good practice to have a Housing Enabling Strategy to bring a level of engagement and transparency to the Council's approach to new house building in East Suffolk, as well as encouraging and facilitating new development.

#### 2 THE STRATEGY

- 2.1 The Housing Enabling Strategy covers the period 2020-2025 and sets out the Council's ambitions over the five years. It was initiated following an officer review of a Government report on local authority best practice for enabling residential development and was written with input from the Housing and Planning Teams. Following its adoption, the Strategy will be shared with developers, community groups and Registered Providers so that it is as inclusive as possible and will encourage their involvement.
- 2.2 The Strategy includes sections that address how the Council can support communities and partners to meet local housing need, how it can encourage sustainable housebuilding and facilitate self-build and custom housebuilding in the district, and how it can deliver more affordable homes. It also considers the use of the Council's own assets to create and unlock opportunities throughout the district alongside strategic 'master-planning' to deliver successful large-scale schemes.
- 2.3 The Council is mindful of its declaration of a climate emergency and this strategy includes our approach to sustainable housing with specific actions to produce a Sustainable Construction Supplementary Planning Document that will relate the sustainable aspects of the Local Plans of the Council.
- 2.4 Throughout the Strategy there are a series of actions aimed at bringing transparency and clarity to our processes, ensuring the Council is moving in the right direction to achieve the objectives outlined within the Strategy. These will be reviewed annually by officers and the Cabinet Members for Housing and Planning & Coast Management.

#### 3 HOW DOES THIS RELATE TO THE EAST SUFFOLK BUSINESS PLAN?

3.1 The East Suffolk Business Plan's Vision includes 'the need for new homes that are affordable and local to our communities', and one of the critical success factors is 'Improved access to appropriate housing to meet existing and future needs, including more affordable homes for local people'. The Housing Enabling Strategy seeks to meet these objectives as well as those stated within the Housing Strategy to help deliver good quality affordable homes across a range of tenures that improve living conditions for

members of the community. This will help keep people well and safe and inevitably contribute to improved quality of life for the residents of the district.

#### 4 FINANCIAL AND GOVERNANCE IMPLICATIONS

- 4.1 The Housing Enabling Strategy considers the approach the Council will take to future housing development in the district across all tenures. This development can bring economic benefits to the district by enabling housing opportunities and unlocking problematic sites resulting in a positive economic impact in the area. There are however no financial implications for the Council with the adoption of the Strategy.
- 4.2 The listed actions within the Strategy will be monitored by officers and reported to the respective Cabinet Members on an annual basis to deliver effective governance of the Housing Enabling Strategy.

#### **5 OTHER KEY ISSUES**

5.1 This report has been prepared having considered the results of an Equality Impact Assessment where no negative impact was identified.

#### **6** CONSULTATION

6.1 The Strategy has been written by the Council's Housing Team in partnership with the Planning Team. No external consultation has taken place in its drafting.

#### 7 REASON FOR RECOMMENDATION

7.1 This Strategy is the first of its kind in East Suffolk. It outlines the issues facing the Council to enable an increased and diverse range of housing development to meet the needs and aspirations of the community in the district.

#### **RECOMMENDATION**

1. That Cabinet approves the Housing Enabling Strategy 2020-2025

APPENDICES	
Appendix A	Housing Enabling Strategy

BACKGROUND PAPERS Please note that copies of background papers have not been published on the Council's website <a href="www.eastsuffolk.gov.uk">www.eastsuffolk.gov.uk</a> but copies of the background papers listed below are available for public inspection free of charge by contacting the relevant Council Department.

Date	Туре	Available From
20.2.2020	Equality Impact Assessment	David Howson

Housing Enabling Strategy

2020 - 2025







## **Foreword**

As the Cabinet Members for Housing and Planning and Coastal Management we are delighted to introduce the first Housing Enabling Strategy for East Suffolk Council. This strategy underlines the importance we place on enabling new housing development in our district across all tenures. We have recognised in the East Suffolk Strategic Plan and our East Suffolk Housing Strategy that there is a need to facilitate new development to meet the demand in our community for good quality affordable homes that are energy efficient and built to environmentally sustainable standards.

In July 2019, East Suffolk Council unanimously voted to declare a climate emergency. We recognise that new housing development has a major part to play in supporting the Council to achieve its commitments to step up its positive work on environmental issues, to reduce its own carbon emissions and to encourage communities to help fight climate change. This strategy sets out our commitment to encourage housing providers and developers across East Suffolk to strive for a greener approach to both existing accommodation and new developments.

We also outline our intentions to encourage diverse developments from large scale housing schemes to self-build single units to community led developments, supporting these where we are able to benefit our residents in East Suffolk.



**Cllr Richard Kerry**Cabinet Member for Housing



**Clir David Ritchie**Cabinet Member for Planning and Coastal Management

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## **Introduction**

This strategy sets out our ambitions in relation to housing delivery over the coming years and sets specific actions to take forward between 2020 and 2025.

Our Housing Strategy, Housing Development Strategy and Housing Revenue Account (HRA) Business Plan have placed a priority on developing new sustainable homes in the district to deliver the housing needed, including new affordable housing to be delivered by both Registered Providers (RPs) and the Council itself. The Housing Strategy identifies certain priorities relevant to this Housing Strategy. These are:

- Increasing the supply of new housing to meet a range of needs, with a more proactive role for the Council supporting the development of affordable homes.
- Working in partnership supporting successful communities, regeneration and economic development.
- Delivering on ambitions to ensure development across the district is increasingly sustainable, including through minimising carbon emissions, and ensuring that development is undertaken in a way which protects and enhances the environment.

The formation of the new East Suffolk Council provides a great opportunity for a corporate strategy to be adopted to help deliver on the stated objectives in the Housing Strategy and HRA Business Plan.

Our housing ambitions will be taken forward through the delivery of our new Local Plans. The Local Plan for the former Waveney area was adopted in March 2019 and the new Local Plan for the former Suffolk Coastal area was submitted for examination in March 2019 and is anticipated to be adopted in 2020. The Local Plans contain policies and site allocations to deliver the housing needed over the period to 2036, including affordable housing. Whilst the central theme of the strategy is about ensuring that housing is delivered to meet housing needs, it is also essential that new housing is of a high-quality design and contributes to meeting wider objectives such as through sustainable construction.

This strategy integrates with the work of several teams within the Council (Housing, Planning, Asset Management, Communities and Economic Development and Regeneration), and then will be shared with developers and RPs so that it is inclusive as possible and co-ordinated with our other Council strategies and policies.

This Strategy considers specific areas that are each discussed and, where appropriate, actions are clearly identified on the right-hand side of the page. These actions form the basis of our action plan at the end of the document and will be the focus for checking our progress.

This Strategy is also supported by our Housing Action Plan, which has a greater focus on the Planning Service in delivering the new Local Plans and is produced in reflection of policy contained in the National Planning Policy Framework. The Housing Action Plan identifies further specific actions to increase delivery of housing covering procedural actions, policy implementation, monitoring and resources. The Housing Action Plan was first published in August 2019 and will be monitored and reviewed.

We recognise that this is an initial strategy that will evolve and its implementation will be monitored by housing and planning officers.

## Supporting communities and partners to meet local housing need

Our role in enabling housing delivery is to encourage innovation and diversity in the development sector and on community led projects, delivering the housing needed. We know that we have work to do on this, but we are confident we can achieve it and we recognise that our new Council provides a great opportunity to help deliver new homes in the district.

We seek to pro-actively support and encourage resident engagement in both our rural and urban communities to help shape housing needs. Parish and town councils are particularly important, and in the interests of enabling communities to be actively involved in housing delivery we believe that their engagement is vital. There are other groups as well such as Community Land Trusts (CLTs) which our supporting role should encompass. The most appropriate way to support communities may change over time.

Consideration needs to be given to resources being available to enable us to support interested community groups in developing plans that set out a positive policy framework to deliver housing. This may be through the preparation of Neighbourhood Plans, the identification of rural exception sites, delivery of housing through CLTs or other community led initiatives.

This support can involve the provision of relevant housing data which can help communities to assess and understand local needs for housing in their area.

Rural enabling partners can help deliver more homes in our communities. By identifying potential sites and working with partners we will ensure that schemes are completed. We already assist rural housing schemes and have been effective in engaging rural CLTs and working with RPs and parish councils.

The enabling role of the Council needs to be properly defined to ensure adequate resources are committed. We recognise the importance of it to help us deliver our housing aspirations, though this must be balanced against difficult financial constraints.

#### Action 01

Review the support the
Council can offer to local
groups in our communities
(particularly rural
communities) and prepare
appropriate
recommendations

#### Action 02

Support Neighbourhood Plan groups and CLTs in creating positive strategies to deliver more housing





## Sustainable housebuilding

In promoting housing delivery, the Council is committed to delivering new homes that are sustainable in terms of their resource use and their relationship with the environment.

This strategy forms one part of the Council's policy approach aimed at delivering new homes in a sustainable way. The Local Plans contain a number of policies which aim to deliver development that is increasingly sustainable, including through sustainable construction approaches which will reduce carbon emissions and water consumption from new development. To assist in the delivery of these policies, the Council will be producing a Sustainable Construction Supplementary Planning Document, and in advance of this have been producing an Environmental Guidance Note. The Council's Housing Development Strategy sets out the Council's position on developing its own housing over the period 2020 – 2024. The Strategy sees environmental sustainability as essential in the creation of new homes and communities and sets out an ambition to explore the use of greener building technologies both within the construction process and finished properties.

The proposed introduction of the Government's Future Homes Standard, through changes to the Building Regulations, is anticipated to bring about further improvements in the energy efficiency of new housing. Embedding sustainable construction approaches within the design of new housing development will therefore be key and is also central to the Council's own Housing Development Strategy.

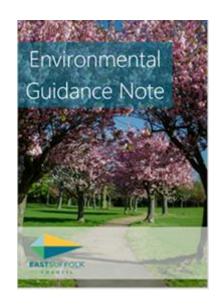
#### Action 03

Produce a Sustainable
Construction
Supplementary
Planning Document that
includes guidance to
implement relevant
policies in the new Local
Plans

#### **Environmental Guidance Note**

We are committed to improving our environment, reducing the impact we have in the area where we live and enhancing the environment wherever possible. We are producing an Environmental Guidance Note covering a range of sustainability issues to guide developers and ourselves. The Guidance Note covers a range of topics including water conservation, energy efficiency, renewable energy, nature and wildlife, siting and orientation, sustainable travel, surface water run-off, and materials and waste.

Whilst not a statutory document, the Council will be promoting the measures contained in the Guidance Note and will encourage developers to use it in delivering sustainable new homes, alongside meeting the requirements of the planning policies. It is anticipated that some elements of the Guidance will be incorporated within the Sustainable Construction Supplementary Planning Document when this is taken forward.



## Self-build and custom housebuilding

The Self-Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) sets out a duty to grant permission to meet demand for self-build and custom build. We are obliged to maintain a self-build register in our district and our role is ensuring sufficient development permissions are granted to meet identified demand on the register. The Act requires that 'Relevant Authorities' must have regard to the register when carrying out functions relating to planning, housing, disposal of Council land and regeneration.

Planning policies in our new Local Plans require 5% of dwellings on sites of 100 or more dwellings to be self-build or custom build, through the provision of serviced plots. Local Plan policies are also delivering self and custom build plots on smaller sites. We believe that we should support and encourage self-build and custom housebuilding to broaden choice and increase housing delivery, including affordable housing.

The information gathered from the register entries has been reviewed and an East Suffolk register is now in place. There is scope to promote the register and self-build and custom housebuilding more positively and proactively.



#### Action 04

Engage with self-build and custom build developers, to explore and support delivery of self and custom build housing, including affordable housing

#### Action 05

Support community led housing where the opportunity arises

#### Action 06

Review the Council's land disposal process to ensure self and custom build is considered



## **Encouraging and facilitating developers and Registered Providers**

Much of the new housing that will come forward in the district will be developed by private developers or RPs. It is therefore vital that we maintain a productive relationship with the development sector and are able to understand any barriers to delivery and implement measures to address these where appropriate.

In addition to the day to day contact with developers through the consideration of planning applications, we hold a regular Developer Forum through which we engage with developers and agents on topical planning matters and the Council's procedures. We also obtain information on anticipated delivery to inform our housing land supply assessments.

We have established a Major Sites and Infrastructure Team in 2019 which provides a dedicated resource focusing on the delivery of sites which are key to the delivery of the strategies of the Local Plans and establishing ongoing communication with relevant developers and agents. Through this approach we can have a much better ongoing understanding of progress on the delivery of housing including associated infrastructure and a much more proactive role in implementation, such as seeking funding through national sources.

We have published a Brownfield Register (as required by national regulations) which identifies brownfield sites which are considered suitable, available and achievable for housing development. The purpose of Brownfield Registers is to provide up to date information on brownfield land that is available for development.

The Housing Strategy aims to broaden the range of developers operating within the district, and this is reflective of national ambition (notably being a key strand of the 2017 Housing White Paper). The new and emerging Local Plans for the East Suffolk area contain a range of sizes of site allocation which should encourage new housebuilders into the area to deliver alongside established developers.

Through the production and monitoring of the Housing Action Plan we can identify any barriers to delivery, along with identifying appropriate actions to address these. Related to this, we have reviewed the way in which we obtain information on the delivery of sites related to the production of the Statement of Housing Land Supply, in order to improve understanding of delivery issues.

Our close working relationship with our RP partners is crucial in delivering affordable general needs housing and supported housing to meet the needs of our community which could not be met by our own resources.

#### Action 07

Continue to hold a regular Developer Forum

#### Action 08

Engage with a wider range of developers / builders /specialist providers (including new entrants into the housing market) to actively enable greater diversity and opportunity

#### Action 09

Identify opportunities to increase new supply with additional partners including for-profit organisations as well as Registered Providers

#### Action 10

To develop, publish and maintain a Housing Action Plan. This sits alongside this Housing Enabling Strategy and identifies actions focused on the Planning Service

#### Action 11

Develop a mechanism for reporting on progress to Members on a regular basis on the delivery of key sites, including any issues / barriers and any measures taken by us

#### Action 12

Update the Brownfield Register annually



## **Affordable housing delivery**

We are committed to delivering more affordable homes in our district and our Housing Strategy and HRA Business Plan state our intentions and the target numbers to be delivered.

There is a need for more detailed data across the district at a local level to supplement the district wide data that we hold. This will help inform delivery objectives at a local level that will meet the needs of our district.

To help us deliver these homes the Local Plans contain policies to secure affordable housing as part of market housing development and which support the development of rural exception sites. We are currently reviewing our arrangements for securing affordable housing through legal agreements related to planning permissions (Section 106 agreement Heads of Terms) to provide greater consistency and clarity, and to ensure that these are as effective as possible in meeting commitments on delivering new affordable homes.



#### Action 13

Consider how our land assets can be used to meet the aims of our housing strategies and prepare proposals

#### Action 14

Develop a strategic approach to identifying opportunities for developing our land assets

#### Action 15

Produce an Affordable Housing Supplementary Planning Document to provide guidance on implementation of the affordable housing policies contained in the new Local Plans

#### Action 16

Review the ways in which the Housing Service is engaged in the planning process and implement measures to enhance this where appropriate

# Using Council assets to create and unlock opportunities in the district

We aspire to bring forward suitable land for housing development and adopt an enabling role for larger public land sites. We recognise the important role we must play in developing our own assets to help regenerate areas and meet housing need. The North Felixstowe Garden Neighbourhood and the Lake Lothing area of Lowestoft are significant current examples of this operating in practice.

Making effective use of the Council's assets cuts across a number of our functions and it is important that there is an embedded co-ordinated approach that includes our Asset Management, Housing, Planning, and Economic Development and Regeneration teams; positively contributing to and facilitating the regeneration of specific areas, such as our role in land purchase in Lowestoft and supporting the Lowestoft Place Board.

The Housing Service operating a separate Housing Revenue Account plays an additional role in unlocking opportunities in the district. Land has been acquired in the Lowestoft and Outer Harbour area to facilitate development and this is expected to continue, including building out new sites for our own housing stock.

#### Action 17

Develop close joint
working across services,
particularly between the
Council's Asset
Management, Housing,
Planning and Economic
Development and
Regeneration Teams





#### Action 18

Explore the use of Compulsory Purchase Orders where necessary to bring development forward



## **Master-planning and development briefs**

We want to develop a 'master-planning' approach that embeds working collaboratively with a wide range of partners, including communities, to deliver housing and mixed-use developments.

Through the Local Plans there are several policies that aim to deliver development that is increasingly sustainable, including policies on sustainable construction which address reducing carbon emissions and water usage. Any master-planning undertaken will of course reflect these policies.

We also see a role for Development Briefs in providing further guidance on policy expectations to assist in proposals being worked up and delivered whilst achieving high quality design. Our own strategic developments in Lowestoft, Leiston and North Felixstowe demonstrate our commitment to this, where a master-planned approach will ensure that development including infrastructure comes forward in a co-ordinated manner.

#### Action 19

Consider how our land assets can be used to meet the aims of our housing strategies and prepare proposals







# **Action Summary**

Action Ref	Action
1	Review the support the Council can offer to local groups in our communities (particularly rural communities) and prepare appropriate recommendations
2	Support Neighbourhood Plan groups and CLTs in creating positive strategies to deliver more housing
3	Produce a Sustainable Construction Supplementary Planning Document including guidance to implement relevant policies in the new Local Plans
4	Engage with self-build and custom build developers, to explore and support delivery of self and custom build housing, including affordable housing
5	Support community led housing projects where the opportunity arises
6	Review the Council's land disposal process to ensure self and custom build is considered
7	Continue to hold a regular Developer Forum
8	Engage with a wider range of developers / builders /specialist providers (including new entrants into the housing market) to actively enable greater diversity and opportunity
9	Identify opportunities to increase new supply with additional partners including for-profit organisations as well as Registered Providers

Action Ref	Action
10	To develop, publish and maintain a Housing Action Plan. This sits alongside this Housing Enabling Strategy and identifies actions focused on the Planning Service
11	Develop a mechanism for reporting on progress to Members on a regular basis on the delivery of key sites, including any issues / barriers and any measures taken by us
12	Update the Brownfield Register annually
13	Consider how our land assets can be used to meet the aims of our housing strategies and prepare proposals
14	Develop a strategic approach to identifying opportunities for developing our land assets
15	Produce an Affordable Housing Supplementary Planning Document to provide guidance on implementation of the affordable housing policies contained in the new Local Plans
16	Review the ways in which the Housing Service is engaged in the planning process and implement measures to enhance this where appropriate.
17	Develop close joint working across services, particularly between the Council's Asset Management, Housing, Planning and Economic Development and Regeneration Teams
18	Explore the use of Compulsory Purchase Orders where necessary to bring development forward
19	Consider how our land assets can be used to meet the aims of our housing strategies and prepare proposals



# Glossary

Term	Definition
Affordable Housing	Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:
	a) Affordable housing for rent meets all of the following conditions:
	(a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable);
	(b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).
	b) Starter homes: is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.
	c) Discounted market sales housing is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.
	d) Other affordable routes to home ownership is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.
Affordable Homes Programme	Investment Programme to support development of new affordable homes by Government appointed Homes England.
Affordable Rent	See Affordable Housing.



Term	Definition
Brownfield Register	Brownfield sites are previously developed land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure. The register is a requirement of the local authority to maintain an up to date record of brownfield sites in the district
Commuted Sums	Capital sums from private developers held by Local Authorities for supporting new affordable housing developments in lieu of providing affordable housing on site.
Community Land Trusts (CLTs)	Independent non-profit trusts which own or control land and facilities in perpetuity for the benefit of the community.
Community Led Housing Development	Where people and communities play a leading role in addressing their own housing needs. The route taken depends on things like the nature of the demand, available resources, location and type of activity. Approaches encompass new build, regeneration and the use of existing buildings. Community-led housing groups may form based on a geographical connection or something else they have in common.
Compulsory Purchase Order (CPO)	An order issued by the government or a local authority to acquire land or buildings for public interest purposes. For example, for the construction of a major road or the redevelopment of certain brownfield sites.
Custom Build	See Self-Build.
Design Statement	A design statement can be made at a pre-planning application stage by a developer, indicating the design principles upon which a proposal is to be based. It may also be submitted in support of a planning application.
Development	Development is defined under the 1990 Town and Country Planning Act as "the carrying out of building, engineering, mining or other operation in, on, over or under land, or the making of any material change in the use of any building or other land." Most forms of development require planning permission (see also "permitted development").
Development Brief	A document, prepared by a local authority, a developer, or jointly, providing guidance on how a site of significant size or sensitivity should be developed. Site-specific briefs are sometimes known as planning briefs, design briefs or development frameworks.
Homes England	Homes England is the non-departmental public body that funds new affordable housing in England. It was founded on 1 January 2018 to replace the Homes and Communities Agency (HCA).
Housing Action Plan	The Housing Action Plan identifies actions to support the delivery of planned housing growth across the East Suffolk local planning authority area, responding to the results of the Government's Housing Delivery Test.



Definition
A non-profit organization that rents houses and flats to people on low incomes or with particular needs.
A ring-fenced account held by local authorities funded by rents to provide landlord services.
The development of a relatively small gap between existing buildings with new housing.
A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.
A type of planning brief outlining the preferred usage of land and the overall approach to the layout of a developer. To provide detailed guidance for subsequent planning applications.
UK Government department whose responsibilities include local government and housing.
Sets out governments planning policies for England.
A plan prepared by a parish council or a neighbourhood forum for a particular neighbourhood area (made under the Planning and Compulsory Act 2004).
Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.
Section 106 is part of the Town & Country Planning Act 1990. Agreements under it cover requirements of developers as part of planning permissions. These are agreed in the planning application process, to provide contributions (usually financial) to develop facilities/amenities for the local community (e.g. education, open space affordable housing).



Term	Definition
Self-Build	Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.
Supplementary Planning Document (SPD)	Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on issues such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.
Sustainable Construction Supplementary Planning Document	A document which adds further detail to the policies in the Local Plan in relation to sustainable construction. It can be used to provide further guidance for development on specific sites, or on particular issues. Supplementary planning documents are not part of the development plan.







#### **CABINET**

Wednesday 6 May 2020

## ADOPTION OF NORTH LOWESTOFT HERITAGE ACTION ZONE DESIGN GUIDE SUPPLEMENTARY PLANNING DOCUMENT

#### **EXECUTIVE SUMMARY**

- 1. The North Lowestoft Heritage Action Zone is a partnership project which began in 2018 with the aim of focusing on the use of heritage led assets to regenerate the area. The production of the Design Guide Supplementary Planning Document forms one part of this project.
- 2. The North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document seeks to ensure that new development conserves and enhances the character of the area and maximises its contribution to the heritage led regeneration of the area. Once adopted, the Supplementary Planning Document will be a material consideration in decision making on planning applications in the area.
- The production of the Supplementary Planning Document has been informed by consultation. The Supplementary Planning Document identifies character areas within the Heritage Action Zone and sets out guidance related to the design of new development as well as identifying enhancements to the public realm.
- 4. The recommendation to Cabinet is to recommend to Council that the Supplementary Planning Document is adopted.

Is the report Open or Exempt?	Open
Wards Affected:	Harbour and Normanston Gunton and St Margarets

Cabinet Member:	Councillor David Ritchie, Cabinet Member with responsibility for Planning and Coastal Management	
Supporting Officer:	Andrea McMillan	
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#### 1. INTRODUCTION

- 1.1 The North Lowestoft Heritage Action Zone (HAZ) is a five-year programme that began in 2018, focusing on the use of heritage assets to regenerate the area. The HAZ programme itself is a partnership scheme between East Suffolk Council, Historic England, Lowestoft Town Council and the East Suffolk Building Preservation Trust. The project aims to improve the overall natural, historic and built environmental quality, making the area more attractive to residents, businesses, tourists and investors. The project covers a wide range of actions including engaging the community in the historic significance of the area and its assets, bringing vacant buildings back into use, working with private sector owners and landlords to jointly fund repair and restoration of historical features back onto the High Street and encouraging footfall by implementing improvements to pedestrian access.
- 1.2 One of the projects of the Heritage Action Zone is the production of a Design Guide to ensure new development conserves and enhances the character of the area and maximises its contribution to the heritage led regeneration of the area. In 2019, Place Services were appointed to produce a Design Guide for the Heritage Action Zone. The Design Guide has been produced as a Supplementary Planning Document and will therefore be a material consideration in determining planning applications for new developments within the Heritage Action Zone, and will be used in decision making alongside policies contained in the Waveney Local Plan. The Design Guide will also feed into other strategies and plans for the area. Whilst the HAZ project itself runs to 2023, the Design Guide will be a legacy of the HAZ project and will guide the design of development in the area beyond the timescale of the project. The project to prepare a Supplementary Planning Document has been undertaken by the Planning Policy and Delivery Team in partnership with the Regeneration Team.
- 1.3 The area covered by the Heritage Action Zone falls within part of the area covered by the strategy for Central and Coastal Lowestoft within the adopted Waveney Local Plan. The Local Plan sets out a number of objectives associated with the regeneration of this area including to improve the natural, historic and built environment, and the Heritage Action Zone projects will contribute towards meeting these objectives. Local Plan Policy WLP2.1 Central and Coastal Lowestoft Regeneration sets out that the Council will work with partners to deliver the objectives for this area. Further policies set out the approach for distinct areas within Central and Coastal Lowestoft, a number of which fall within the area covered by the Heritage Action Zone, and the Design Guide seeks to support the delivery of these policies.
- 1.4 Local Plan Policy WLP2.2 Power Park allocates land for employment uses and port related development and seeks to also bring about enhancements to the area including improvements to the public realm and improving connectivity with the surrounding area including the Scores and the historic High Street. Policy WLP2.5 East of England Park allocates 7.87ha of land as a destination park with the aim of enhancing and revitalising the existing open space. Policy WLP2.9 Historic High Street and Scores sets out a policy approach to conserve and enhance the area through heritage-based regeneration. The Heritage Action Zone Design Guide will provide a basis for informing the design of development proposals to complement the delivery of these policies. A Neighbourhood Plan is also currently being produced by Lowestoft Town Council.
- 1.5 The Design Guide covers an area which extends further south than the Heritage Action Zone itself as through the preparation of the Design Guide it was considered appropriate to consider linkages within the wider Power Park area. The area covered by the Design Guide is shown on the map on page 5 of the document attached as Appendix A to this report.

- 1.6 The Design Guide focuses on design principles, layout, scale, appearance, landscaping and access, and will be applied to development coming forward across the area covered by the Design Guide. Through the preparation of the Design Guide five distinct character areas have been identified High Street/Historic Core, Whapload Road, Power Park and surrounds, Historic Parklands and The Scores. The character areas are mapped within the Supplementary Planning Document which is appended to this report. The Design Guide sets out the planning policy context, describes the historic evolution of the area, contains a statement of heritage significance which describes the attributes of each character area, provides guidance for new development for each character area, provides guidance for the public realm including highways related guidance, sets out guidance for alterations and provides guidance for shopfronts.
- 1.7 The Supplementary Planning Document is to be adopted by full Council. This report is being presented to Cabinet with the recommendation that the Cabinet recommend to Council that the Supplementary Planning Document is adopted.

## 2. PRODUCTION OF NORTH LOWESTOFT HERITAGE ACTION ZONE DESIGN GUIDE SUPPLEMENTARY PLANNING DOCUMENT

- 2.1 Design consultants, Place Services, have been appointed to produce the Supplementary Planning Document. Work on the Supplementary Planning Document began in summer 2019 and initially involved a 'walkabout' with relevant officers and representatives of Lowestoft Town Council.
- 2.2 Following this, an initial draft of the Design Guide was produced and in October 2019 two consultation events were held. The Stakeholder workshop was held on 17<sup>th</sup> October, and a range of stakeholders were invited such as Suffolk County Council, Historic England, East Suffolk Building Preservation Trust, Lowestoft Town Council, the Council's Local Plan Working Group and Council officers from Economic Development, Planning and Design and Conservation. The workshop involved a presentation given by the consultants, which described the Design Guide's contents in detail, and feedback was invited. A public consultation event was also held, on 28<sup>th</sup> October, whereby an early draft of the Design Guide was made available at a drop-in session and the public were invited to ask questions and make comments. Thirteen members of the public attended the event.
- 2.3 The comments made at the two events were considered in preparing a draft Design Guide which was subject to a formal public consultation for six weeks between 13<sup>th</sup> December 2019 and 24<sup>th</sup> January 2020. In total 27 individuals and organisations responded to the consultation and between them they made 123 comments. There were

41 comments of support, 3 objections and 79 observations. In summary, the main issues raised through the consultation were:

- Overall support for regeneration of the area, with a number of specific locations referenced, and emphasis that respondents would like to see the proposals in the Design Guide implemented.
- Objections and concerns regarding the perception of 'conservation at any cost', the financial implications for building owners including the colour palette for shopfronts.
- Respondents provided additional historical information on the area and individual buildings.
- There is support for the well-illustrated document and clear and coherent set of principles.
- Support received for enhancing the appearance of the scores, widening footpaths, high quality surface finishes and planting.
- Requests for further guidance and information to be included in the document on climate change and flooding.
- Respondents suggested there should be further guidance on planting
- Requests for improved cycle routes as per the Waveney Cycle Strategy.
- Further reference should be included in relation to tourism including the presence of the North Denes Caravan Park.
- Further guidance should be included on designing out crime.
- Comments noted concern over the level of detail regarding highways proposals.
- Respondents identified concerns over traffic and parking, and the need for better public transport.
- Comments expressing support and concern for a pedestrian crossing at Crown Street.
- The comments have been considered in finalising the document, and changes have been made to address many of the comments including through:
  - Changes to reflect the provision of further historic information.
  - Further references to actions that can support mitigating and adapting to climate change including linking with actions in the Waveney Cycle Strategy and referencing sustainable construction.
  - Further explanation of appropriate approaches towards planting, including noting that in some locations this may not be suitable.
  - Further recognition of North Denes Caravan Park as a tourism use in the area.
  - Amendments to the section covering potential highways proposals to clarify that these are concepts and not firm proposals.
  - Further reference to designing out crime in the Public Realm section of the document.

- 2.5 Further amendments have also been made to the document following further engagement with the Council's Design and Conservation Team, including in relation to clarifying the relationship with the North Lowestoft Conservation Area Appraisal, including further reference to the design policies of the Waveney Local Plan, including more description of the High Street/Historic Core, amendments to reflect recent changes to the Listed Building register and to clarify the status of heritage assets which are not listed and further clarification over the intended use of and reasoning for some elements within the Guidance chapters (chapters 7-10). It should be noted that potential alterations to North Lowestoft Conservation Area are currently being considered and the Guidance acknowledges this.
- 2.6 Further details of the consultation undertaken are contained in the Consultation Statement which is appended to this report (Appendix B).

## 3. CONTENT OF NORTH LOWESTOFT HERITAGE ACTION ZONE DESIGN GUIDE SUPPLEMENTARY PLANNING DOCUMENT

- 3.1 The final North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document is appended to this report (Appendix A). The paragraphs below summarise the content of the Supplementary Planning Document.
- 3.2 Chapter 1 'Introduction' sets out the background and purpose of the document, in that it will ensure that new development conserves and enhances the character of the area and maximises its contribution to heritage led regeneration.
- 3.3 Chapter 2 'Heritage Action Zones' provides information on Heritage Action Zones and specifically on the North Lowestoft Heritage Action Zone.
- 3.4 Chapter 3 'Aims and Scope' sets out the overall purpose of the document and introduces the character areas.
- 3.5 Chapter 4 'Policy and Guidance' sets out the relevant national and local planning policy.
- 3.6 Chapter 5 'Historic Evolution' provides an account of the historic evolution of the area covered by the Design Guide dating back to a map produced in 1578.
- 3.7 Chapter 6 'Statement of Heritage Significance' describes the historic significance of the area, considering each character area in turn, as summarised below:
  - High Street/Historic Core characterised by its independent commercial buildings and continuous frontages, set within burgage plots and punctuated by the Scores.
  - Whapload Road characterised with remaining evidence of Lowestoft's maritime history, contributing to the town's industrial character and dominated with historic commercial warehouses and net stores now in light industrial uses.
  - Power Park and surrounds largely of modern character with few remnants of historic built structures, although the Smoke House remains. This area covers the northern part of the Power Park allocation in the Waveney Local Plan (under policy WLP2.2) and an area to the north of the allocation.
  - Historic Parklands characterised by nineteenth century parks which are described as being significant features of the Heritage Action Zone.
  - The Scores described as being a significant feature of the Heritage Action Zone, these are dispersed across the centre of the HAZ, each lane being distinct in its character.

- 3.8 Chapter 7 'Guidance for New Developments' sets out guidance for each character area as summarised below:
  - Historic Core The guidance Identifies the scale, form, palette of materials, brick and architectural detailing and other characteristics of the High Street, and this area of the HAZ is described as having some of the finest buildings in the area. The guidance provides photographic examples of developments that have the design qualities that would be suitable on the High Street and directly behind the High Street.
  - Whapload Road The guidance identifies the dominant gable frontage, long building depths, building orientation and palette of materials prevalent in the area. The guidance provides a sketch of an indicative development and photographs demonstrating the key principles of design.
  - Power Park and surrounds The guidance recognises key new developments and identifies a modern material and colour palette. The guidance provides an indicative sketch and photograph examples of suitable modern, industrial buildings.
  - Parklands The guidance notes the constraints of topography and access, identifies
    the mix of materials, and recognises the limited opportunities for development. The
    guide notes the importance of Bellevue Park as a registered park and other green
    spaces.
  - The Scores The guidance notes the unique and distinctive form of the scores to Lowestoft which contribute to the sense of place and history. The guide provides historic photos, character assessment, a palette of materials, an indicative backland development sketch, and photographic examples of developments.
- 3.9 Chapter 8 'Guidance for the Public Realm' provides detailed guidance on how works to the public realm can be undertaken in a way which would contribute to enhancing the character of the area. The chapter contains a number of aspirational approaches which are intended to inform any future proposals for public realm enhancements. The document provides guidance on street furniture, for example in relation to the colour of street furniture and advising that historic street furniture be refurbished / retained where possible. This chapter also sets out some aspirational concepts relating to potential highways works which would contribute towards meeting the heritage and regeneration aims for the area. Two of the highways related concepts promoted by the Design Guide relate to enhancing pedestrian priority in the High Street and provision of a pedestrian crossing to reconnect Crown Street, however it should be noted that these are presented as design concepts rather than as proposals. This part of the design guidance also contains guidance related to the enhancement of key public spaces of Blue Anchor Square and the Gateway to the Scores (outside of Christ Church). Guidance is also provided on plant palettes, i.e. the types of planting that may be suitable within each character area.
- 3.10 Chapter 9 'Guidance for Alterations' contains broad guidance on alterations to historic buildings, and it is expected that this would be used in conjunction with the more detailed guidance for each character area.
- 3.11 Chapter 10 'Shopfront Guidance' reflects that the High Street contains a variety of historic shopfronts albeit that a number have been altered in an inappropriate manner in the past. The guidance therefore sets out guidance on a range of matters including materials, display, shopfronts, advertisements, letters and symbols, A-boards and hanging signs.

#### 4. FINANCIAL AND GOVERNANCE IMPLICATIONS

- 4.1 The production and adoption of the North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document is covered by the existing budgets of the Planning Policy and Delivery Team and the Regeneration Team.
- 4.2 The production of the Supplementary Planning Document forms part of the North Lowestoft Heritage Acton Zone project which is a partnership between East Suffolk Council, Historic England, Lowestoft Town Council and the East Suffolk Building Preservation Trust. The production of the Supplementary Planning Document has been undertaken by East Suffolk Council through the Planning Policy and Delivery Team and the Regeneration Team, involving the use of consultants Place Services who were commissioned under Council's procurement process.
- 4.3 The process for production of Supplementary Planning Documents is set out in the Town and Country Planning (Local Plans) (England) Regulations 2012 (as amended). This requires the Council to undertake consultation to inform the production of the Supplementary Planning Document. This was undertaken through a stakeholder event and a public drop-in as described in paragraph 2.2 above. The Council's Statement of Community Involvement (How to get involved in Local Planning, Waveney District Council, September 2014) also sets out what the Council will do at this stage and through provision and advertising of stakeholder and public events the Council has met its requirements.
- 4.4 The 2012 Regulations set out specific requirements for consultation on the draft Supplementary Planning Document. This requires that the document is published for a minimum of four weeks and that during that time it is available on the Council's website and that hard copies are available for inspection in the Council's offices. The Statement of Community Involvement states that at this stage the Council will also make copies available at local libraries and other local public places considered appropriate, will extend the statutory consultation period to six weeks, will contact those on the planning policy consultation database, will issue a press release and will use social media. The Council has met all these requirements, as detailed in the Consultation Statement appended to this report.
- 4.5 On adoption of the Supplementary Planning Document the Council is required to publish the Supplementary Planning Document and supporting documents as soon as reasonably practicable on the website and to make hard copies available at Council offices. The Statement of Community Involvement also states that adoption will be publicised via social media and that hard copies will be placed in local libraries. Should there be restrictions in place affecting the availability of hard copies at the time of adoption, for those unable to access documents online alternative measures will be put in place where possible until such time as restrictions are lifted.
- 4.6 Under the Environmental Assessment of Plans and Programmes Regulations 2004 screening was carried out on the draft Supplementary Planning Document to determine whether a full Strategic Environmental Assessment would be required. The screening concluded that this was not required. The Draft Strategic Environmental Assessment Screening Opinion was subject to consultation with the three consultation bodies as prescribed by the Regulations (Environment Agency, Historic England and Natural England) who concurred with this conclusion. The final Strategic Environmental Assessment Screening Opinion is appended to this report.
- 4.7 Screening was also undertaken under the Conservation of Habitats and Species Regulations 2017 (as amended) which concluded that guidance and proposals in the

North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document are considered to have no significant adverse impact on any Natura 2000 sites either independently or in combination with other plans and strategies and that it is therefore not considered necessary to undertake an Appropriate Assessment of the North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document. Natural England were consulted as the appropriate nature conservation body and concur with this conclusion. The final Habitats Regulations Assessment Screening Statement is appended with this report.

#### 5. OTHER KEY ISSUES

5.1 An Equality Impact Screening Assessment was undertaken on the draft Supplementary Planning Document and was published alongside the draft Supplementary Planning Document for public consultation. The Screening Assessment concluded that no negative impact upon any group with protected characteristics was identified and therefore a full Equality Impact Assessment is not required. The Screening Assessment did also identify positive impacts in relation to the protected characteristics of age and disability. The Screening Assessment has been revisited following amendments undertaken to the Supplementary Planning Document following consultation and is appended to this report.

#### 6. CONSULTATION

- 6.1 Consultation has been undertaken to inform the production of the Supplementary Planning Document as summarised in this report and in the Consultation Statement appended to this report.
- 6.2 Consultation has been undertaken to meet the requirements of the Town and Country Planning (Local Plans) (England) Regulations 2012 (as amended) and the Council's Statement of Community Involvement.
- 6.3 A Stakeholder workshop was held on 17<sup>th</sup> October 2019 to which a range of stakeholders were invited such as Suffolk County Council, Historic England, East Suffolk Building Preservation Trust, Lowestoft Town Council, the Council's Local Plan Working Group and Council officers from Economic Development, Planning and Design and Conservation. The workshop involved a presentation given by the consultants, which described the Design Guide's contents in detail, and feedback was invited.
- 6.4 A public consultation event was held on 28<sup>th</sup> October 2019. The event was advertised on the Council's website and Facebook page as well as on Twitter. Posters were placed throughout the HAZ area along the High Street and Whapload Road. The Council also contacted the Most Easterly Community Group, which is a local community organisation. At the drop-in session an early draft of the Design Guide was made available and the public were invited to ask questions and make comments. Thirteen members of the public attended the event.
- 6.5 The comments made at the two events were considered in preparing a draft Design Guide which was subsequently subject to a formal public consultation for six weeks between 13<sup>th</sup> December 2019 and 24<sup>th</sup> January 2020. The public consultation involved contacting all of those whose details are held on the planning policy consultation database, advertising the consultation by poster in the local area, issuing a press release, publicising the consultation on the Council's website and issuing social media posts.
- 6.6 In total 27 individuals and organisations responded to the consultation and between them they made 123 comments. There were 41 comments of support, 3 objections and 79 observations. These comments have helped to inform the final Supplementary

Planning Document as set out in section 3 above and the Consultation Statement which is appended to this report.

#### 7. OTHER OPTION CONSIDERED

7.1 An alternative option would be to not adopt a Design Guide Supplementary Planning Document for the North Lowestoft Heritage Action Zone. However, this would represent a missed opportunity to fully support the implementation of the HAZ project and to support the delivery of adopted planning policies for the area.

#### 8. REASON FOR RECOMMENDATIONS

8.1 The North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document will inform the design of development coming forward in the Heritage Action Zone which will contribute towards meeting the overall aims of the project. The production of the document has been undertaken in accordance with regulatory requirements and has been informed by consultation.

#### **RECOMMENDATIONS**

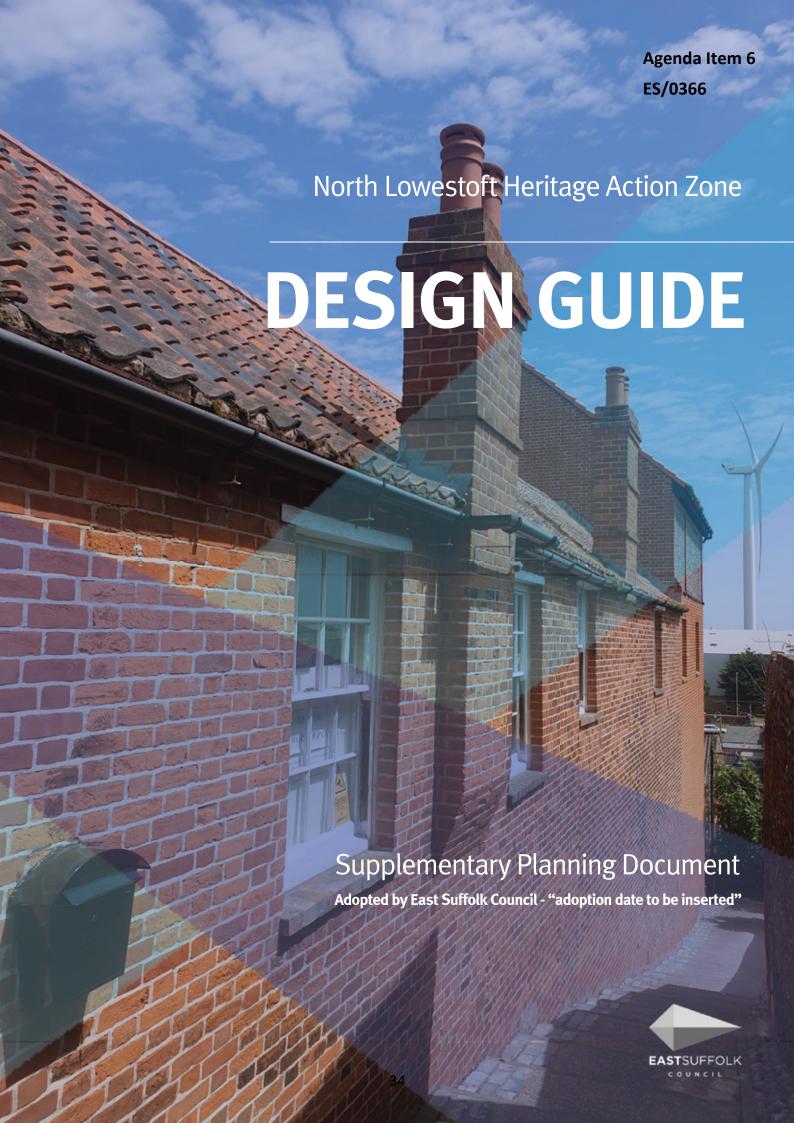
- 1. That Cabinet notes and endorses the content of the North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document.
- 2. That Cabinet recommends to Full Council that the North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document be adopted.
- 3. That the Head of Planning and Coastal Management, in consultation with the Cabinet Member for Planning and Coastal Management, be authorised to make any factual or typographical amendments to the Supplementary Planning Document prior to its adoption.

APPENDICES		
Appendix A	North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document	
Appendix B	North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document – Consultation Statement	
Appendix C	Equality Impact Assessment	
Appendix D	Strategic Environmental Assessment Screening Opinion	
Appendix E	Habitats Regulations Assessment Screening Statement	

#### **BACKGROUND PAPERS**

Please note that copies of background papers have not been published on the Council's website <a href="www.eastsuffolk.gov.uk">www.eastsuffolk.gov.uk</a> but copies of the background papers listed below are available for public inspection free of charge by contacting the relevant Council Department.

Date	Туре	Available From
2014	Statement of Community Involvement - How to get involved in Local Planning	https://www.eastsuffolk.gov.uk/assets/Planning/Waveney- Local-Plan/Statement-of-Community- Involvement/1Statement-of-Community-Involvement- September-2014.pdf
2019	Waveney Local Plan	https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/waveney-local-plan/.



## **ACKNOWLEDGMENTS**

### Prepared by

Document owner	Organisation role
Martin Ivatt	Principal Urban Designer

### Control

Date	Author	Approved by
13.12.2019	Martin Ivatt	Peter Dawson
05.02.2020	Martin Ivatt	Peter Dawson
14.04.2020	Martin Ivatt	Peter Dawson



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# 1.0 Introduction

The area of Lowestoft covered by this Guide was originally the main medieval settlement, grown around a thriving fishing industry, including merchants' houses and commercial premises on the cliff top, and workers cottages and net stores below. The North Lowestoft Heritage Action Zone (HAZ) will run until the end of March 2023. For more details refer to: https://historicengland.org.uk/services-skills/heritage-action-zones/north-lowestoft-heritage-quarter/

The Design Guide will be a legacy of Historic England's Heritage Action Zone project. The adopted North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document (SPD) will continue to be used and have statutory weight beyond the 2023 HAZ project. It will be used to determine Planning Applications and guide regeneration in the north Lowestoft area covered by the Supplementary Planning Document.

The North Lowestoft HAZ focuses on the medieval High Street, 11 Scores (steep narrow paths in the cliff), historic smokehouses and net stores, and once fine Victorian parks of north Lowestoft. It will provide support, training, advice and grant funding to bring buildings back into use as housing or retail spaces. Research and a programme of community activities will make sure that the heritage of the area becomes better-known and valued.

Additionally, a system of well-designed and accurate information boards containing important data on Lowestoft's medieval location, including its surface

geology and topography, will be considered for placement around the HAZ area to inform local residents and visitors of its historical significance.

The Design Guide will be adopted as a Supplementary Planning Document in line with the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) Regulations 2012. As a result, the Design Guide will help determine planning applications for new developments within the North Lowestoft HAZ alongside the Local Plan, emerging Neighbourhood Plan and national planning policy.

The Design Guide will ensure a coherent North Lowestoft HAZ wide strategy which meets the requirements of all stakeholders, while maintaining sufficient flexibility to adapt to any emerging future requirements. It will allow stakeholders to understand the impact of the proposals and have the necessary confidence that the form and content of the proposed development is acceptable and that high quality buildings and public realm will be delivered through any future Reserved Matters Applications.

The purpose of this guide is also to help facilitate the delivery of high quality design for the North Lowestfoft HAZ area, without unnecessary prescription or detail, particularly relating to the design of individual buildings. It will therefore focus on strategic rules in relation to layout, scale, appearance, landscaping and access.





## 2.0

## Heritage Action Zones (HAZ)

Heritage Action Zones are a Historic England initiative designed to unleash the potential of the historic environment. They aim to create economic growth, improve quality of life in villages, towns and cities across the country.

Through HAZ, Historic England partner with local people and local authorities to help breathe new life into old places that are rich in heritage. By utilising heritage, HAZ support sympathetic and high quality regeneration of historic areas. This ensures that HAZ meet their potential and are more attractive to residents, businesses, tourists and investors.

HAZ aims to address:

- Historic buildings that have deteriorated through decades of neglect will be restored and put back into use;
- Conservation areas improved to kick-start regeneration and renewal; and
- Unsung places will be recognised and celebrated for their unique character and heritage, helping instil a sense of local pride wherever there's a Heritage Action Zone.

### LOWESTOFT HERITAGE ACTION ZONE

The North Lowestoft Heritage Action Zone is a five year programme that began in 2018, using heritage assets to regenerate the area. This is a partnership scheme between Historic England, East Suffolk Council, Lowestoft Town Council and the East Suffolk Building Preservation Trust (ESBPT). The partnership works with a range of other local partners, including Lowestoft Vision. There are a range of projects, including capital works to improve the area, and projects that involve the community in their local heritage to raise awareness of the value of the heritage to their environment. It provides support, training, advice and grant funding to bring buildings back into use as housing or retail spaces.

Further research and a programme of community activities ensure that the heritage of the area becomes enhanced and valued throughout the life of the project and results in a legacy for the future, in addition to improving public safety throughout the HAZ area through a sufficient street lighting strategy. The North Lowestoft HAZ focuses on an area which contains a large part of the North Lowestoft Conservation Area with its medieval High Street,

Scores, historic smokehouses, net stores, and Victorian Parks. It also includes the area of the Denes, an area leading down to the coast at the east, which is linked to the medieval core by a series of alleyways called the Scores. This part of Lowestoft was originally the core of the medieval settlement, grown around a thriving fishing industry, including merchants' houses and commercial premises on the cliff top, and workers' cottages and net stores below.

The North Lowestoft HAZ boundary evolved during consultation with Stakeholders - the HAZ boundary has remained unchanged, however, the area covered by the Design Guide has been expanded to include the whole of the Power Park area for master planning purposes.

The adopted North Lowestoft Heritage Action Zone (HAZ) Design Guide Supplementary Planning Document (SPD) will continue to be used and have statutory weight beyond the 2023 HAZ project. The HAZ Design Guide SPD will also be used to inform the development of the Lowestoft Town Centre Masterplan and other relevant strategies.

## 3.0 Aims & Scope

"Our built heritage represents the very best of our past. It also provides a huge resource that can play an important role in the future of our towns, cities and rural areas in terms of the stimulus provided to regeneration and the promotion of sustainable development. Evidence from across the country demonstrates that 'Heritage Works' and is a valuable asset that has an important role to play as a catalyst for regeneration."- Historic England: The use of historic buildings in regeneration (2013)

Additionally, please see the link below to Historic England's 2018 factsheet (Heritage Counts) illustrating the economic and commerical value of heritage in the East of England: https://historicengland.org.uk/content/heritage-counts/pub/2018/heritage-and-economy-infographics-eofe-2018/

One of the outcomes of the North Lowestoft Heritage Action Zone is the production of a Design Guide to ensure new development conserves and enhances the character of the area and maximises its contribution to the heritage led regeneration. This project will unlock the potential of North Lowestoft's Heritage Action Zone, promoting

sympathetic and attractive future development whilst helping to instil a sense of local pride. It is aimed to complete this through joint-working, grant funding and skill sharing. To provide context, this report provides a summary history of the North Lowestoft HAZ. This design supplement sets out the process for managing change affecting heritage assets within North Lowestoft, and provides guidance and principles on design interventions in the Historic Environment.

The HAZ is divided into 5 zones which are shown on page 18, represented throughout the document by the following icons:



Historic Core/High Street



Parklands



Whapload Road



Scores



Power Park





HAZ area walkabout with East Suffolk Planning, Policy and Economic Regeneration officers and Town Council representatives

# 4.0 Policy, Advice & Guidance

This Supplementary Planning Document should be read in conjunction with national policy and guidance set out in the National Planning Policy Framework, and the Waveney Local Plan. There are a number of strategies in the Waveney Local Plan and other documents which seek to deliver improvements in Lowestoft including in relation to cycling, tourism, flooding, renewable energy, and sustainable construction.

### **Key Planning Policies**

- NPPF (2019)
- Waveney Local Plan (2019)
  - o Policy WLP2.1 Central and Coastal Lowestoft Regeneration
  - o Policy WLP2.2 Power Park
  - o Policy WLP2.5 East of England Park
  - o Policy WLP2.9 Historic High Street and Scores
  - o Policy WLP2.9 Historic High Street and Scores
  - o Policy WLP8.15 New Self Catering Tourist Accomodation
  - o Policy WLP8.24 Flood Risk
  - o Policy WLP8.29 Design
  - o Policy WLP8.30 Design of Open Spaces
  - o Policy WLP8.31 Lifetime Design
  - o Policy WLP8.37 Historic Environment
  - o Policy WLP8.38 Non-Designated Heritage **Assets**
  - o Policy WLP8.39 Conservation Areas o Policy WLP8.40 - Archaeology
- Lowestoft Neighbourhood Development Plan (Emerging)
- North Lowestoft Conservation Area Appraisal

## Other relevant guidance that may be of interest

- Historic England Advice Note 1: Conservation Areas
- Historic England Advice Note 2: Making Changes to Heritage Assets
- Historic England Advice Note 12: Statements of Heritage Significance
- Historic England Good Practice Advice Note 3: The Setting of Heritage Assets
- Historic England CPPG (2008)
- Historic England: The use of historic buildings in regeneration (2013)
- Crime Prevention Through Environmental Design (CPTFD)
- Secured by Design (SBD) Police Security Initiative

## NATIONAL PLANNING POLICY **FRAMEWORK**

The National Planning Policy Framework (NPPF) places considerable importance upon the protection of heritage assets and the historic environment. Paragraph 184 describes the heritage assets as an '...irreplaceable resource...' which should be "...conserved in a manner appropriate to their significance...'

The NPPF therefore states that protection for heritage assets should be in proportion to their significance. Paragraph 195 states that when deciding planning applications local authorities should resist applications that would cause substantial harm to a designated heritage asset, unless this is necessary to deliver public benefits that would outweigh this substantial harm. Paragraph 196 states that in cases where an application causes less than substantial harm to a designated heritage asset this should be weighed against the public benefits of the proposed development. This level of protection should also be applied to buildings that contribute to the significance of conservation areas. Paragraph 197 states that the impact upon non-designated heritage assets should also be considered when deciding planning applications.

The importance of good design in creating high quality places is detailed in Section 12 of the NPPF. Paragraph 124 states that "good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities." Paragraph 127 notes that decisions should ensure that developments "are sympathetic to local character and history".

Overall, the NPPF does not seek to prevent development of heritage assets or of the wider historic environment. Indeed, it is recognised that the historic environment has the potential to contribute to development and economic growth. However, the NPPF does seek to protect those aspects that contribute to the significance of a heritage asset or the historic environment.

## WAVENEY LOCAL PLAN

The Waveney Local Plan is the development plan for the former Waveney District, which covered the northern portion of East Suffolk. The Waveney Local Plan identifies central Lowestoft (which includes the

### WLP2.1 (Central and Coastal Lowestoft Regeneration)

This policy seeks a collaborative approach between different stakeholders regarding the regeneration of Central Lowestoft, which includes the area covered by the HAZ. Regeneration projects should meet the requirements of each character area specified in the Local Plan. For the HAZ area this includes enhancing the High Street as a visitor destination, improvements to Ness Park and improved linkages to other parts of the town. The HAZ Design Guidance will help to ensure that regeneration projects within Central Lowestoft are in accordance with the Local Plan's vision for the area and respect its built heritage.

## WLP2.2 Power Park

The Power Park is situated directly to the south of the HAZ and is a cluster of the businesses focused on the renewable energy sector. Policy 2.2 seeks to develop this cluster further and also to provide better cycle and pedestrian linkages with other parts of the town. The area covered by the HAZ design guidance will be extended southwards to provide guidance about improved linkages and shared streetscapes with the Power Park.

## WLP2.5 East of England Park

Ness Park contains Ness Point, which is Britain's most easterly point and contains a range of visitor facilities. This policy seeks to protect the historic environment of the area, particularly the drying racks, but also enable environmental improvements and better connectivity with other parts of the town. The HAZ Design Guide enables developments to meet these objectives by protecting and enhancing the built environment and improving streetscapes and the public realm.

HAZ) as being the focus of regeneration. This includes public realm improvements to the High Street and greater connectivity between different parts of the town.

## WLP2.9 (Historic High Street and Scores area)

This policy sets out the objectives for regeneration of the High Street and Scores area. The HAZ Design Guidance will deliver these objectives, which are to conserve and enhance the High Street and Scores to support regeneration and to enhance shopping facilities; to improve and expand the Triangle Market; increase connectivity and legibility between the High Street and East of England Park; support the delivery of new housing of exceptional design; ensure that changes to shopfronts remain in keeping with the area.

## WLP8.37 (Historic Environment)

This policy seeks to protect the historic environment and sets out the information requirements for proposals that affect the historic environment. All development that affects the historic environment should be supported by a heritage impact assessment. Development proposals should also take account of the Built Heritage and Design SPD. The HAZ Design Guide will help to deliver this policy by ensuring that development protects and enhances the existing character of the area. The Design Guidance will be used to assess future planning applications in the HAZ area

### WLP8.38 (Non-Designated Heritage Assets)

The Heritage Action Zone is a historic environment and this policy will apply to non-designated heritage assets that are located here. Proposals for the reuse of Non-Designated Heritage Assets should be compatible with the elements of the fabric of the building and its setting. Proposals that involve the demolition or partial demolition of a Non-Designated Heritage Asset will be resisted unless the building is beyond feasible repair and all efforts to sustain the existing use have proven unsuccessful.

### WLP8.39 (Conservation Areas)

The North Lowestoft Conservation Area overlaps significantly with the Heritage Action Zone. The Conservation Area is recognised for its unique historic character and the policy seeks to protect Non-Designated Heritage Assets contained within the Conservation Area. This policy also contains guidance regarding the replacement of doors, windows and porches within Conservation Areas.

### WLP8.40 (Archaeology)

This policy favours preservation in situ where possible unless a programme of recording, assessment, analysis reporting, dissemination and deposition are more appropriate. This would include any archaeological material found in the Heritage Action Zone. Early engagement with SCC Archaelogical record is beneficial in identifying the potential at a site in the early stages of development.

## LOWESTOFT NEIGHBOURHOOD DEVELOPMENT PLAN (EMERGING)

The emerging Lowestoft Neighbourhood Development Plan will set out defined policies for how development should come forward within the town and places particular emphasis on both enhancement and protection of character and quality of design.

The emerging Plan will aim to focus specifically on the matters of design and character of forthcoming development through achieving a number of objectives including (subject to change after public consultation):

- Providing site-specific design solutions, responding directly to local context and conditions,
- Demonstrating an integrated approach to the design of buildings, townscape, streets and spaces,
- Responding to the scale, height and massing,
- Creating enclosure and definition to streets and spaces
- Prioritising the needs and convenience of pedestrians
- Designing for low vehicle speeds
- Using high-quality and durable materials
- Ensuring that future maintenance is considered
- Welcoming creative and innovative design solutions

## NORTH LOWESTOFT CONSERVATION AREA APPRAISAL

The North Lowestoft Conservation Area was designated in 1973 and was extended to the north in 1996 and to the south in 2003. The North Lowestoft Conservation Area Character Appraisal was published in March 2007 and seeks to cover a number of important issues relating to how development should come forward within the Conservation Area. An updated North Lowestoft Conservation Area Appraisal is expected to be adopted in 2020.

The appraisal sets out that the purpose of the conservation area is not to prevent new development or stifle the area's economic growth potential, but that particular consideration and a high degree of attention should be paid to design, repair and maintenance in the area, The purpose of the appraisal is to help preserve and enhance the North Lowestoft conservation area through:

- Describing the character of the area
- Identifying its special character
- Putting forward a basis for effective policy control of development; and
- Identifying proposals for its enhancement

The appraisal is of significance to this Guide as it covers a large area of the HAZ, particularly around the High Street and Scores and therefore its contents are highly relevant and applicable. The North Lowestoft Conservation Area maps are attached with the appendix.

## BUILT HERITAGE AND DESIGN SUPPLEMENTARY PLANNING DOCUMENT

The adopted Built Heritage and Design SPD (2012) provides practical guidance about development, alterations and changes to historic buildings.

East Suffolk Council is in the process of producing a new Historic Environment Supplementary Planning Document. It is intended that this will include detailed guidance on development, alterations and changes to historic buildings in East Suffolk, as well as information on installing sustainable technology and adapting to climate change.

The North Lowestoft HAZ Design Guide SPD provides information and guidance that is specific to the HAZ area to enable regeneration and enhance the local built environment. The North Lowestoft HAZ Design Guide SPD will inform work on the Lowestoft Town Centre Masterplan and other Lowestoft initiatives."

### LOWESTOFT FLOOD RISK MANAGEMENT

The lower lying coastal area, formerly known as the Beach Village suffered major flooding during the first half the 20th Century. Damage from repeated floods and WWII led to the area being redeveloped for commercial and industrial use.

Areas of Lowestoft are located within the flood zone 2 and 3, include parts in the Heritage Action Zone. The flood risk areas are along Whapload Road and the coast, North Denes Caravan Park, and the Denes Oval and Recreation Ground.

The Lowestoft Flood Risk Management Project is developing a way to reduce the risk of flooding from the sea, rivers and rainfall. The completed project will reduce the risk of homes and businesses flooding and support the regeneration and economic growth in Lowestoft.

Further detailed guidance that includes information on flood risks and management is being developed seperately for the Power Park.

### **CLIMATE CHANGE**

East Suffolk Council declared a climate emergency in July 2019 and the environment is a top priority for the council. An Environmental Task Group was established to ensure all policies are fit for purpose and identify areas for improvement.

The regeneration of north Lowestoft through the support of the Heritage Action Zone scheme and Design Guide will enable people to live, work and shop locally and sustainably reducing the need for travel.

The need for sustainable development underpinned the development of both the Waveney Local Plan and Suffolk Coastal Local Plan. Both Local Plans contain planning policies that address renewable energy, and sustainable construction. Advice on installing renewable energy technologies and adapting historic buildings to increase their energy efficiency is provided by Historic England and will be included in a new Historic Environment Supplementary Planning Document. Each historic building is unique and offers its own opportunities and constraints and should be considered individually. Advice is available from the East Suffolk Design and Conservation Team through the pre-application advice service.

## 5. Historic Evolution



# 5.0 Historic Evolution

### **BASELINE HISTORY**

This section provides a baseline history of Lowestoft with a focus on the area included in the Heritage Action Zone. It includes an overview of the development of the historic town, in order to underpin the Design Guide and ensure that all future regeneration of the North Lowestoft HAZ is sympathetic to its historic significance.

Post-medieval to Modern (1486 AD – 2000 AD) Cartographic evidence from 1578 highlights the extent of Lowestoft by the late sixteenth century. The High Street, extending as far as St. Margaret's Plain, is a planned settlement dating back to the second half of the 14th Century. The community moved here from an inland site for a variety of reasons, and the layout of the High Street and cross lanes is still evident today. This area was densely developed, and a fort had been established, with the scores leading down the cliff from the High Street to the 'fish houses' and 'Deanes'.

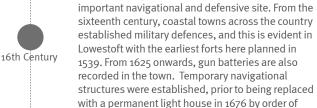


Map of Gunton, Suffolk 1578 [cartographer unknown]

As Lowestoft grew in size and fortune, it became an



Lowestoft from The Denes 1896 (Francis Frith ref: 37942)



Samuel Pepys in the area of Bellevue Park.

By the early seventeenth century, Lowestoft is recorded as being home to c.100 occupations, including textile and clothing manufacture, metalworking, and food and drink production. The town was able to grow rapidly to accommodate this diverse economy due to the weekly market and surrounding agriculture which supported it. Herring fishing also continued to remain a significant element of the local economy throughout this period.





Gas Works on Ness Point and environs, 1939 (Britain from Above)





The Sands Lowestoft, 1887 (Francis Frith Ref: 19829)

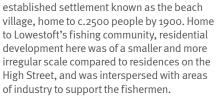
The area was predominantly of an industrial character as demonstrated by the introduction of the gas works in this area in the mid-1800s, and contained large warehouses and sheds to support the herring industry.

Passing of the Norwich and Lowestoft Navigation Bill of 1827 promoted further growth in Lowestoft. The 1827 venture failed overall, however it paved the way for the purchase of land to the south of the harbour by Samuel Morton Peto in 1844. Peto transformed the town and established Lowestoft as a holiday resort by overhauling the fishing town. This regeneration shifted the focus of the town away from the High Street and towards the harbour and the new town to the south, and south beach became the centre of amusement and recreational activities.



The North Denes continued to be used by smaller vessels and fishermen, who lived and worked in the beach village until the area was cleared in the 1960s. Additionally, the North Denes area evolved as a place used for tourism, such as the holiday caravan park, and has greatly contributed to the character of Lowestoft seen

Expansion to the north of High Street also began from the later 1800s. After the opening of Bellevue Park in 1874, Lowestoft's first public park, polite society was attracted to the area and established grand residences on the cliff top to the north of the park.



During the 1790s a substantial community began to develop to the east of the High Street, on the Denes. The community expanded rapidly in the mid-1800s to become an



OS Map 1886-1890



Interior of the Netting Sheds ©English Heritage NMR Reference Number: AA98/12838



today.

By 1911, at the peak of production in the British fishing industry, the population of Lowestoft was recorded as 37,886. Although the outbreak of the First World War impacted Lowestoft's fisheries sector, it also gave rise to the growth of other industries such as shipbuilding and engineering. Lowestoft was bombarded by the German Navy during the First World War and heavily bombed during the Second World War; the beach village was also commandeered by the British military during the latter conflict, exacerbating harm to the settlement. Bomb damage along the cliff top led to extensive rebuilding programmes throughout the twentieth century, to infill gaps left by bombs. World War II features are evident on the Denes, including barbed wire obstructions and a barrage balloon site (LWT 090). 'Bomb craters' on the Denes are the remains of the Lowestoft Links Golf Course. These theories are understood to explain the formation of the current landscape features.



Denes Recreation Ground, 1928

Throughout the later twentieth century, Lowestoft was impacted by a downturn in both the fishing and tourist industries, leading to a period of economic decline. Modernisation was undertaken in the 1960s and 1970s, with considerable redevelopment to the west of the High Street. The construction of the town bypass in the 1970s, in particular, resulted in the clearance of substantial areas of historic built form.



Early 20th Century

OS mapping 1860s and 1960s showing the loss of residential development and rise of larger industrial plots

During the twentieth century, leisure became an increasingly lucrative industry in Lowestoft. New leisure facilities were constructed on the Denes and North Parade in the early twentieth century, including the Denes Oval, new tennis courts, cricket facilities and a new pool. The open air, salt water swimming pool that stood close to the sea has been filled in and was located close to the current North Denes Caravan site.



Bellevue Park and Residences, 1928 (Britain from Above)

In January 1953, the beach village was hit by a dramatic flood which swept away older sea defences and heavily damaged the village settlement and southern areas of the town. The impact of the flood, combined with the destruction caused here during World War II, led to the abandonment of the beach village and the land was subsequently redeveloped for industrial use.



Late 20th Century



# 6.0 Statement of Heritage Significance

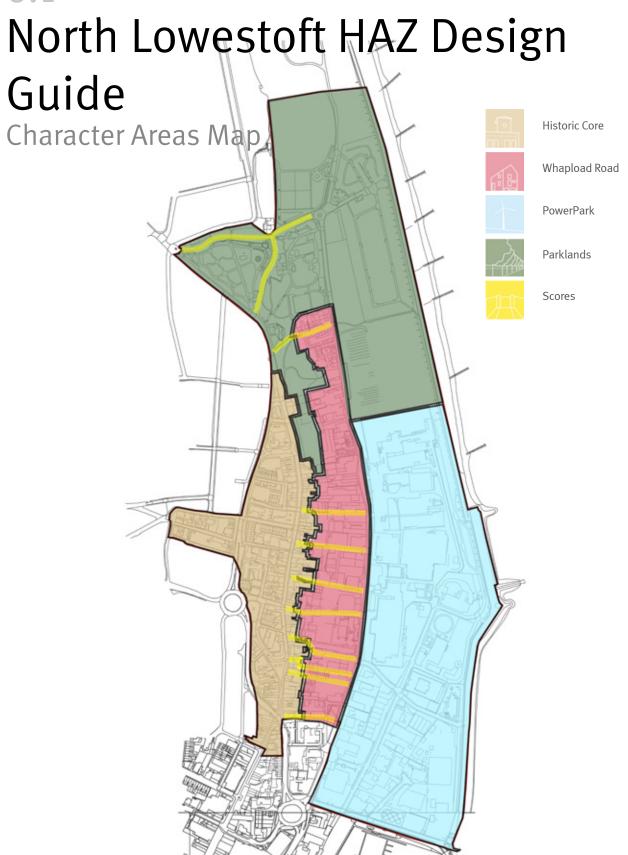
North Lowestoft derives its significance from its surviving historic street pattern and fine townscape, as well as its status as one of England's pre-eminent fishing ports on the East Anglian coast during the medieval and post-medieval period. This is augmented by its later evolution into a leisure destination during the nineteenth century, which saw the creation of refined Victorian parks to the north of the town centre. This rich history has left a legacy of striking civic, domestic and commercial buildings along the historic High Street. There are also rare surviving examples of post-medieval fishing infrastructure along the parallel route of

Whapload Road. Together with the varied and dramatic topography of the cliff, the geology of which creates the unique, steeply sloping alley-ways known as 'The Scores', the combination of North Lowestoft's high quality historic townscape, richly detailed architecture, and unique urban morphology results in place that is divided into distinct character areas, all of which can boast a very high level of heritage significance. The concentration of listed buildings, the designation of the Conservation Area, and the consequent Heritage Action Zone scheme all reflect this special interest.



1910's - Bellevue Park

6.1

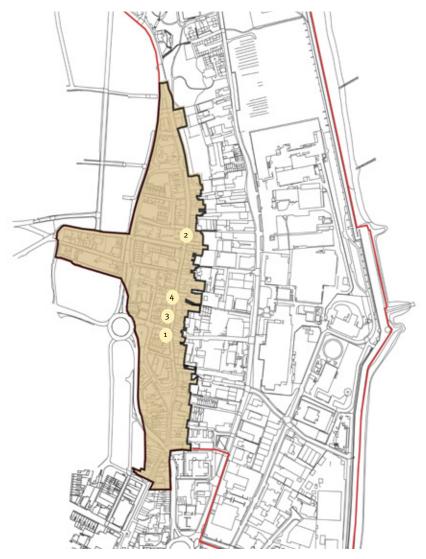


## Character Area 1

## High Street/Historic Core

Within the historic core, the High Street is characterised by its independent commercial buildings and continuous frontages, set within burgage plots and punctuated by the Scores. The overall high quality of the historic built space is a significant feature of Lowestoft and comparible to other, more famous historic towns. Developed from the fourteenth century, its streetscape is rich in architectural detail, noteworthy for its lack of uniformity in scale and design which is reflective of its continued importance and development.

Post-medieval buildings contribute positively to the historic significance of the area, creating a varied vista of steeply pitched roofs and jettied first floors, in contrast to the later Georgian and Victorian shop frontages, constructed in brick and more rhythmic in design, with detailed features such as door cases, windows, lobbies, and moulded cornicing. Local building materials such as gault brick, stucco and pantile dominate, creating consistency within the street. Large, high status houses were erected in High Street following the town's development as a coastal resort.



## **HIGH STREET CHARACTER AREA IMAGES**





The Old Blue Anchor public house





Strong Georgian / Victorian brick frontages



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## Character Area 2

## Whapload Road

Whapload Road retains evidence of Lowestoft's maritime history, contributing to the town's historic industrial character. The area is now dominated by large commercial premises comprising of historic warehouses and net stores, now in light industrial use. This enhances our understanding of the historic trade in this area and contributes to its significance. These buildings are orientated east west, with gable ends facing onto Whapload Road. This creates a

strong rhythm to the streetscape, and opportunity for a visual connection with the High Street, with 'pleasing' views east towards the buildings, roofscape and gardens of the High Street. It is vital to preserve and enhance the historical buildings that still exist here, particularly the fishery office at 329 Whapload Road - a building of national importance and a recently designated Grade Il Listed building under Historic England records.



## WHAPLOAD ROAD CHARACTER AREA IMAGES





Christchurch on Whapload Road



Bottle store for the Eagle Brewery that stood on site



View towards the High Street from Whapload Road



A traditional herring smoke house

22

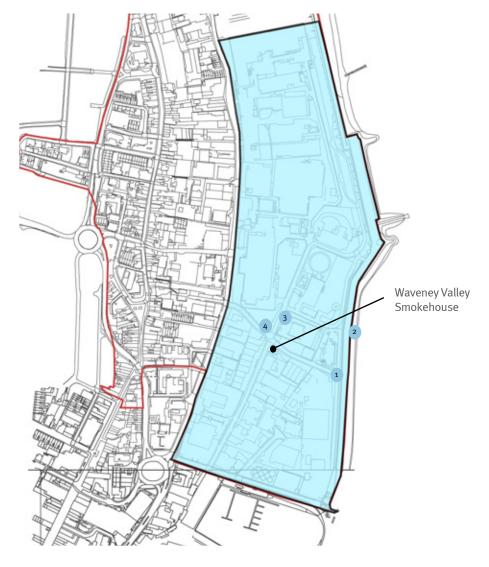
## Character Area 3

## Power Park and Surrounds

The industrial development surrounding the Gas Works, now predominantly comprised of land known as the Power Park, is largely modern built character. The area includes modern buildings of large mass and height. There are very few remnants of historic built structures in this area; the Smoke House is an important survivor of the small-scale smoked herring industry of this area, and highlights the smaller scale character of this area prior to the loss of the Beach Village. The smoke house - see labelled map below - is a single-storey red brick structure orientated east to west and located on Wilde Street. The

street plan here has largely been lost to modern development; however, Wilde Street follows the historic Wilde Score, connecting the beach with the historic town core. Ness Point is of particular significance as the most easterly point of the British Isles, giving the beach here a unique character.

This area increasingly shares an association with the off shore wind farm, with a high number of buildings constructed for the use by the renewable energy sector with emphasis is being placed on the creation of high quality, sustainable and energy efficient buildings.



## **POWER PARK CHARACTER AREA IMAGES**





Orbis Energy Building and Gulliver wind turbine



View north towards Ness Point along sea wall



View west from Orbis Energy towards Birdseye factory



View towards former gas holder on Gasworks Road, a strong reference for future placemaking and identity

## Character Area 4

## Historic Parklands

The north extent of the North Lowestoft HAZ is primarily characterised by verdant, nineteenth century parks, Bellevue Park and Sparrow's Nest. Bellevue Park, a Grade II Registered Park and Garden, was the first free public park established in Lowestoft. It was laid out in the style of a formal pleasure ground and opened in 1874. Sparrow's Nest followed shortly after, and was once the summer home of Robert Sparrow of Worlingham Hall, and later functioned as a pleasure garden in the twentieth century following its acquisition by the town corporation in 1897. These parks are significant features of the North Lowestoft HAZ, are well preserved components of the pleasure town, and will be important to interlink them, to integrate the 'green areas' with the

built environment. Their significance also derives from the group value of heritage assets contained within, in addition to the beneficial contribution they have on views towards the cliffs. On lower ground to the east, Ness Park is open in character, enclosed by a substantial sea wall with a narrow sandy beach beyond. This park is of historic value and shares a strong association with the fishing industry of the Denes, as it has retained the historic drying racks used by fishermen of the former Beach Village. Work in the North Denes area will also draw attention to the remains of the rope walk and liver trench, of which the latter was used to boil down cod livers saved from Iceland voyages over fire pits, to make train oil for fueling domestic lamps and treating leather.



## HISTORIC PARKLANDS CHARACTER AREA IMAGES





Lowestoft Naval Memorial



Sunken gardens within Bellvue Park



Thatched Lodge within Bellevue Park



courts

## Character Area 5

## The Scores



Despite being dispersed across the centre of the North Lowestoft HAZ, the Scores are a significant feature of the area and distinct in its character. While functioning as pedestrian passageways physically linking the High Street with the Denes, each lane is also unique in its form and character. The Scores are of significant historic and evidential value, created over time by the footfall of people wearing paths in the soft, sloping cliff as they travelled between the historic High Street and the Beach Village. They are narrow, and generally widen towards

Whapload Road where modern development has eroded parts of the historic architectural townscape. The lanes are predominantly straight, but there are exceptions as they follow irregularities of property boundaries. For the most part, they are enclosed by high flint and brick walls, with shallow steps, and some are marked by archways and alleys between buildings. While some have been lost, 11 have been retained and are still in use by the community today.



## THE SCORES CHARACTER AREA IMAGES





View east along Wilde Score from the carriage arch



View east along Rant Score towards the Powerpark



View up Mariners Score towards High Street



View down Lighthouse Score

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6.2

## **Key Heritage Assets**

### **DESIGNATED HERITAGE ASSETS**

There are 51 designated heritage assets within the conservation area of the North Lowestoft Heritage Action Zone. This comprises of 1 grade II\* listed building, 48 grade II listed buildings and structures, and 1 grade II Registered Park and Garden. Designated heritage assets, which are considered to make a key contribution to the historic character of the areas, are outlined below:

- North Lowestoft Conservation Area: The North Lowestoft Conservation Area covers the historic core of the modern town of Lowestoft, and largely overlaps with areas of the HAZ. The key significance of the North Lowestoft Conservation Area is defined by the retention of the historic street plan and morphology which enhance our understanding of Lowestoft's origins as a fishing port and market centre.
- Town Hall (Grade II): This building is notable for its architectural interest, as a good example of a civic building in the Italianate style, its communal value, and its prominence on the western side of the High Street.
- Continuous façades on the High Street (Grade II and Grade II\*): These buildings are of significant group value for the contribution they make to the historic character and architectural variety of the streetscape.
- Maritime Museum (Grade II): This building is of interest for its architectural detail and historic value as a well preserved house constructed in 1828 in pebble render with brick quoins and dressings under a pantile roof. It sits within the restored Sparrow's Nest Park and is now also notable for its communal value gained from conversion to a museum, hosting exhibitions about the history of Lowestoft and its herring industry.
- High Lighthouse (Grade II): This has been the site
  of a lighthouse since 1676, making it of historic
  value to the town and reflective of its importance to
  the coast. The lighthouse was rebuilt in 1853 and is
  of 3 storeys, with a gallery at the lantern stage and
  a glazed lantern surmounted by a weather-vane.
- Naval War Memorial (Grade II): This memorial is

- of communal value as a landmark structure within Bellevue Park which commemorates 2,385 names from the patrol depot "Europa" who never returned to their base at Sparrow's Nest.
- No. 329 Whapload Road (Grade II): A mid 17th Century salt store, later extended into a fish smoke house during early 18th Century. Noted for its architectural interest and strong group value with another building to the rear of Whapload Road.
- Fish House to the rear of 312-14 Whapload Road (Grade II): Former workshop and store with 16th century origins and listed as its a rare example of this type of fishing industry-related building, as well as retaining parts of its original fabric, including timber mullioned windows.
- Bellevue Park Registered Park and Garden (Grade II): This park is significant as the first public park to be opened in Lowestoft, and for its associative value and connection with chairman of the Lowestoft Improvement Committee, James Peto, and two of the Committee's members, William Youngman and William Rix Seago, who were responsible for turning the idea of a 'symbol of Lowestoft's growing civic pride' into a reality. It follows the character of contemporary pleasure grounds, with winding paths and cross-walks through areas of lawn densely planted with a wide variety of specimen trees and shrubs, and a pagoda-style bandstand on the eastern boundary to take advantage of the sea views.



High Lighthouse (Grade II)

## CONTRIBUTION OF OTHER ASSETS

A range of other assets are located within the Heritage Action Zone, which make a positive contribution to its significance. The Heritage Action Zone initiative is designed to unleash the potential of the historic environmental and possibilities for regeneration, and the key assets identified that could facilitate this are considered to be:

- The Scores: These are of high value to North Lowestoft, and are a unique feature of the town. They have been created and maintained by centuries of use, and are reflective of the importance of the herring industry to the growth of the clifftop town. They are still of high communal value to this day, being home to a heritage trail and the annual Scores Race, Britain's most easterly hill race, which includes 401 steps across 11 of Lowestoft's historic scores.
- Fishing Industry structures: Examples of industrial buildings remaining on Whapload Road and within the former Beach Village are fairly limited, which make those that have survived significant features.

The Smoke House is particularly important for its representation of the small-scale industry which once dominated this area, and as one of very few remaining structures of the smoked herring industry. It is a single-storey red brick structure on Wilde Street, aligned east-west, with a pitched pantile roof. A number of brick-built warehouses can be found on Whapload Road. These are all, notably, orientated east-west, and are typically three storeys high with gable end frontages facing onto Whapload Road. Although this area has lost much of its historic architectural character it has retained its economic importance to Lowestoft, similar to its role throughout the medieval and early modern periods.

 Christ Church: Significant for its historic, architectural and communal values. It was constructed in the mid- nineteenth century to serve the community in the Beach Village. The church is Gault brick with red brick stringcourse decoration, and simple geometric tracery is used across the building.

### IMPORTANT LOCAL SPACES

A number of spaces within the HAZ have been assessed and are considered to contribute positively to the built and natural landscape of the HAZ area despite the current lack of formal designation. These include:

- Sparrow's Nest Park: Sparrow's Nest Park is well
  maintained and in active use making a positive
  contribution to the North Lowestoft HAZ. It contains
  a number of recreational facilities, including
  bowling greens, cafes and a bandstand, with
  distinct areas of planting including large lawn
  areas, sunken gardens, ponds and fountains.
- Ness Park: A new park will recognise the importance of Lowestoft and Britains most easterly point through provision of a new green space in the area covering the net drying racks, adjacent to the Birdseye factory to the south and North Denes Caravan Park to the north. The new park will improve access, knowledge and interpretation of the HAZ in this area and its maritime connection.

- Ness Park will feature naturalistic planting to maintain its heritage and setting, whilst improving cycling and pedestrian access to the sea wall and coastal paths.
- A caravan park occupies a large area of coastal frontage between the historic drying racks to south and open area of grass to the north. The Tingdene North Denes Caravan Park is visible from the surrounding roads and paths including Whapload Road and Gunton Cliff. The caravans visually conflict with the historic and natural characteristics of the historic parklands area but offers holiday accommodation that supports the local tourist economy.
- Other important spaces include the public square at The Blue Anchor pub, as well as The Triangle market; both of which have been identified as 'Key Spaces' within the public realm section on page 51 of this document.





## Guidance for New Developments

## Historic Core

The purpose of this built form analysis is to help pick out the overriding features of the townscape, which should be referenced when taking development forward. This

will assist in ensuring that development is place specific in terms of the character of the Historic Core.

## **EXISTING DEVELOPMENT**

The area defined as the Historic Core, as identified earlier in this Guide, covers the historic High Street and surrounding side streets, extending to the A<sub>47</sub> corridor and slightly beyond to cover Crown Street West and adjacent streets. This area of the HAZ contains the oldest, and some of the finest buildings in the area which range in age from the fifteenth century onwards but largely consisting of buildings from the Edwardian and Victorian period. Buildings on the High Street are typically residential premises above shops on the ground floor which are set immediately against the back of footway. This area benefits from a range of architectural

and period design styles, with no one single style dominating the streetscene. Behind the High Street on side streets are larger single plots which have been redeveloped into apartment blocks, creating a significantly different grain than the traditional, close knit and tight urban grain of the historic High Street.

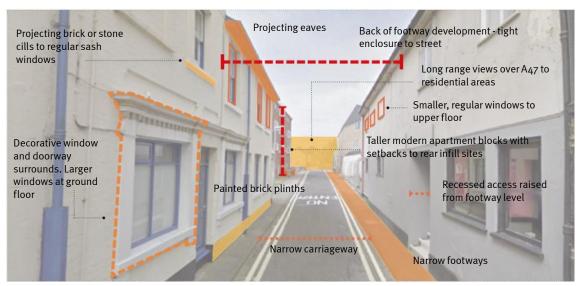
The following diagrams highlight the general attributes of the spatial form in this area and represent the key features of the area which should be considered should development sites come forward within the Historic Core.



Gateway to the High Street from the south

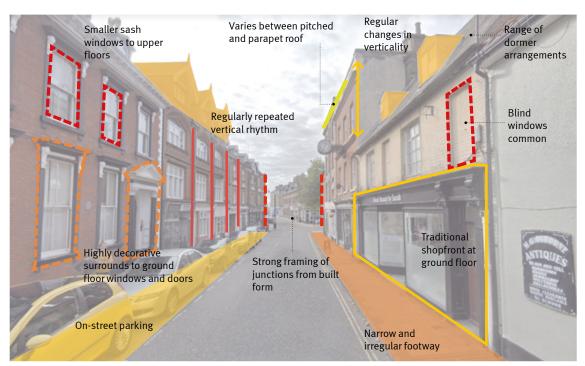


Gateway to the High Street from the north

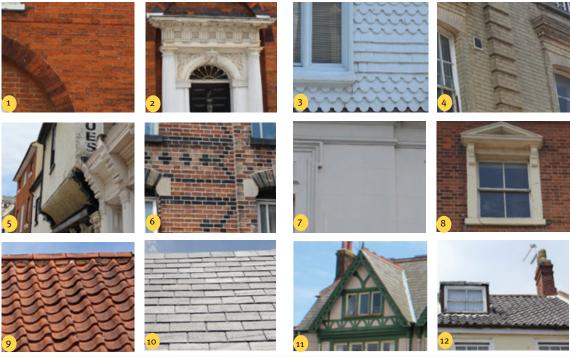


Crown Street East looking west

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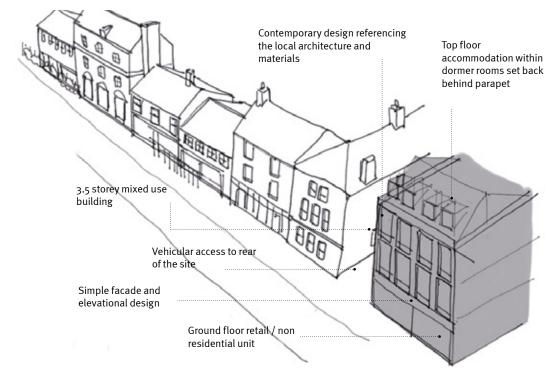
High Street looking north



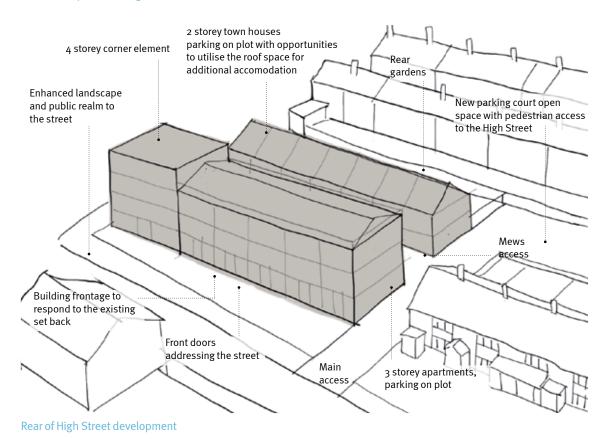
- 1. Suffolk Red brick with header arches over doors and windows
- 2.White painted aperture detailing
- 3.Painted clay tiles
- 4. Gault brick with pilasters and decorative brickwork
- 5. Jettied timber frame building and cornice detail
- 6.Diaper brickwork in contrasting tones
- 7. Various tones of painted render over brickwork
- 8.Sash windows
- 9. Clay or terracotta pantiles
- 10. Slate roof tiles
- 11. Timber framed gables
- 12. Range of chimneys with dormers, of varying types, inset into roof and eaves

## INDICATIVE DEVELOPMENT FORMS

The illustrations below indicate how new development can utilise plots appropriately by providing a conceptual indication of the design principles that could be applied.



Infill development on High Street



North Lowestoft Heritage Action Zone - Design Guide

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Development behind the High Street is generally very different to how development would appear on the High Street frontage itself. They are larger plots, often abutting the A47 and are adjacent to less high-quality built form — certainly when compared to the High Street.

The images below have been included as indicative of the type of built form that is considered would be in keeping of the character of the local area, as well as maintaining a level of high-quality design.













- 13. Infill development in local vernacular materials to traditional dimensions and scale
- 14. Modern townhouse development with a strong, traditional linear orientation interspersed with mews court spaces
- 15. Simple terraced rowhouses with variation in brick to provide contrast and sense of identity to each house
- 16. Row of three storey gable fronted townhouses with frontage parking and refuse storage
- 17. Higher density four storey apartment block with high quality brick and detailing
- 18. Gable fronted brick aparmtent block featuring traditional design elements in a contemporary style

7.1



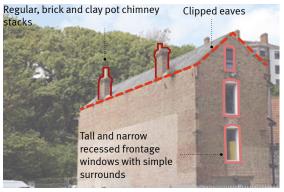
## Guidance for New Developments Whapload Road

The purpose of this built form analysis is to help pick out the overriding features of the townscape, which should be referenced when taking development forward. This will assist in ensuring that development is place specific in terms of the character of the Whapload Road area.

### **EXISTING DEVELOPMENT**

The existing built form on Whapload Road is highly distinctive, not only within the HAZ area but the wider region and is synonymous with the fishery industry which dominated this area.

Whilst some more recent additions are present in the streetscene which are of little distinction or interest, the identity of Whapload Road is defined by the historical smoke houses which front onto the road and generally run in a strong east-west alignment. These typologies are unique and should be taken as as templates for upcoming development in the area. Features such as local brick, pantile roofs, painted brick and strong vertical emphasis from tall and narrow windows are common and help to reinforce the strong sense of place that ties Whapload Road to its historical purpose. Development should reflect these characteristics, be no more than 4 storeys in height and maintain a strong built frontage onto the road, utising the traditional forms in a contemporary idiom with careful consideration of flood risk and future climate change.



Clipped eaves, tall, narrow windows to frontage and brick chimney stacks



Dominant gable frontage, continious ridge lines and a range of seperation distances

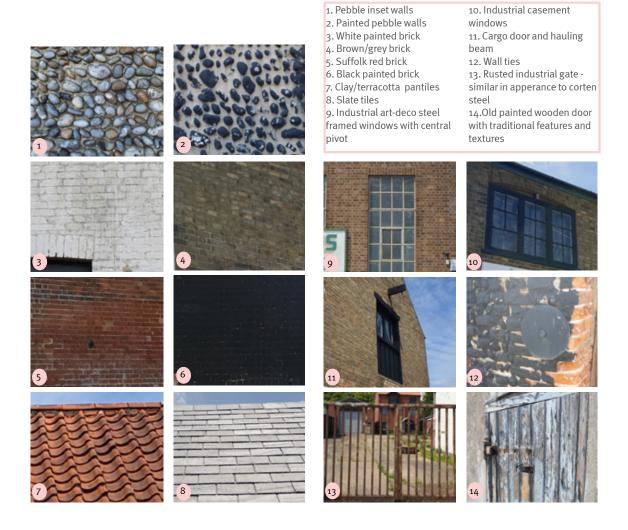


Illustration showing variety of gable styles, shapes and colours common along Whapload Road

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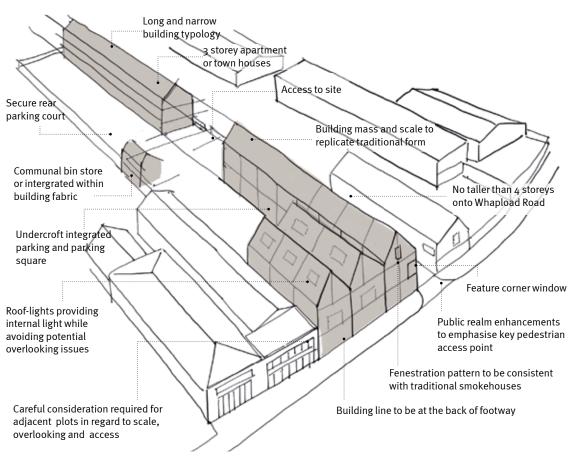


Predominant building depths on Whapload Road



70

The illustration and photographs set out further principles for the design of new development in the Whapload Road area.



Indicative development on Whaplaod Road

- 15. Apartment block utilising strong gables and patterned brickwork
- 16. Vertical application of wood or metal slats on a gabled facade 17. Vertical timber boarding
- with simple gable and window details
- 18. Dark red brick gabled townhouses with vertical windows
- 19 Modern interpretation of a traditional vernacular 20. Light/gault brick with clipped eaves on apartment block
- 21. Dark metal roof with interesting materiality to gable - slim skylights



















# Guidance for New Developments

### PowerPark and Surrounds

The purpose of this built form analysis is to help pick out the overriding features of the townscape, which should be referenced when taking development forward. This

will assist in ensuring that development is place specific in terms of the character of the Power Park and surrounds area

#### **EXISTING DEVELOPMENT**

The area defined by the PowerPark is currently occupied by a range of commercial and industrial land uses including manufacturing, light and heavy industry and more recently business and technology units. The area has the appearance of an industrial estate, which is due to the lack of enhanced public realm, utilitarian warehouse style buildings and a lack of activity onto the street and austere perimeter fences with vacant land, however areas of interest exist such as the prominent Gulliver wind turbine and the Orbis building which act as locally distinctive buildings. There is

currently very little to denote the history of the area, nor the existence of the Beach Village prior to its clearing. Buildings are of a larger scale and bulk than the surrounding area, and the dominant colour palette is largely greys and blues, with cladding, corrugated metal, brick, and occasional glass and concrete.

The PowerPark lies largely within the flood zone, and development in this area would also need to consider any further guidance which is developed for the PowerPark, on flood risk management and design.



Graded colour corrugated steel on Birdseye Factory



The Orbis building marks a departure from the prevailing typologies present in the area



View from Orbis over the Power Park and Whapload Road towards the High Street

#### NEW DEVELOPMENT IN THE POWERPARK

Recent developments, including the Scottish Power Renewables building on Hamilton Road are beginning to adapt and modernise the material palette that exists in the PowerPark area. This includes the use of metal cladding, floor to ceiling curtain wall glazing, recessed windows and strong gable features with recessed frontage. This building provides a positive precedent for development within the PowerPark as further plots come up for development. New development should also build upon the dominant colour palette at the



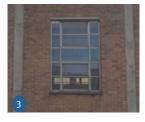
Scottish Power Renewables on Hamilton Road utilising modern materials

- Grey corrugated steel walls to large, pitched roof buildings typical
   Distinctive site history
- reflected in road names 3. Steel industrial windows set within red/brown brick with vertical concrete banding
- 4. Dark blue corrugated steel 5. Red brick with two banding courses
- 6. Graded grey to blue colours of the Birdseye factory - a palette well used across the PowerPark
- 7. Concrete and glass utilised on the Orbis building offer a more modern design ethos and materiality
- 8.Blue rainscreen cladding and dark coloured brick to the plinth of the Orbis building

PowerPark, largely spectrum of greys, silvers and shades of blue. Consideration should also be given to enhancing the sustainability credentials of buildings within the PowerPark, ensuring that they are highly energy efficient and incorporate on-site energy generation methods where possible.







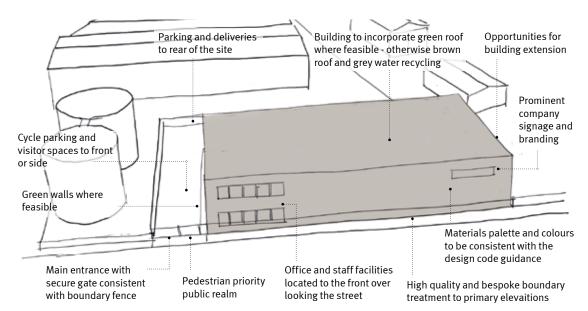












Example development in PowerPark illustrating the principles of layout (not architectural) within the PowerPark



- 9. Bespoke boundary treatments such as black weld mesh fencing with inset wind turbine silhouettes
- 10. Large floorplan commercial unit flanked with corten steel to provide a contemporary, weathered effect
- 11. Smaller scale start up/business units with sawtooth roof
- 12. Attractive and innovative glass and steel main entrance with large footprint operational area to the rear
- 13. Large glass and steel building referencing boatyards
- 14. Metallic material used to positive visual effect
- 15. Gables utilised on long side elevation
- 16. Contemporary interpretation of chimneys to refer to an areas industrial past

















# Guidance for New Developments Parklands

The purpose of this built form analysis is to help pick out the overriding features of the townscape, which should be referenced when taking development forward. This will assist in ensuring that development is place specific in terms of the character of the Parklands area.

#### **EXISTING DEVELOPMENT**

The Parkland area covers a number of green spaces at the northern end of the HAZ area, including Bellevue Park which is a registered park. The area has historically been developed sporadically and infrequently, with existing buildings tending to be standalone and set within their own land. Due to the topogrpahy of the land, constraints of movement and access and the nature of the space as a protected area of green space for Lowestoft, there are very limited opportunities for development within this area.

Despite this, there could occassionally be situations where small scale redevelopment of a plot could arise,

and therefore it is important to understand the prevailing character of the materials within this zone. Development tends of be of a domestic nature, with the exception of the Sparrows Nest buildings on Yarmouth Road, and there is a mixture of materiality which includes Suffolk red brick, pebble inset walls and boundary treatments and formal gardens and paths which help to provide a sense of setting for the buildings and a greater setback from the street. It is recommended that a thorough context appraisal is undertaken for any development within this zone, responding directly to the surrounding built form and fabric.



Views across the park to the seafront and Maritime Museum



Examples of limited development within the Parkland zone



Pebble wall with red brick coping



Concrete and brick/tile feature



Thatched lodge with formal planting



# Guidance for New Developments The Scores

The purpose of this built form analysis is to help pick out the overriding features of the townscape, which should be referenced when taking development forward. This will assist in ensuring that development is place specific in terms of the character of the Scores.

#### **EXISTING DEVELOPMENT**

The Scores are unique to Lowestoft and include distinctive built forms which contribute to a strong sense of place and history. The Scores connect the High Street, or higher levels at the top of the cliff, with Whapload Road, the Denes and waterfront at the bottom of the cliff. Due to a combination of piecemeal historical development, awkward access and

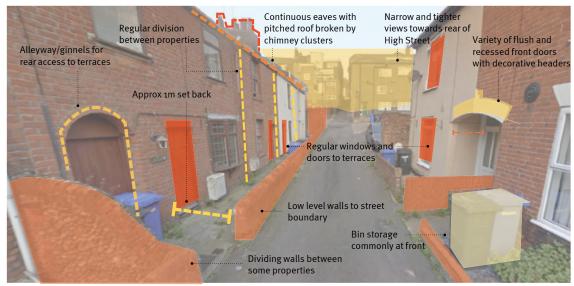
movement arrangements and the issue of gradients and topography, they present interesting challenges to successful development, but also the opportunity to create bespoke and unique places that create strengths from these challenges and reflect the very identity and nature of built form in Lowestoft.



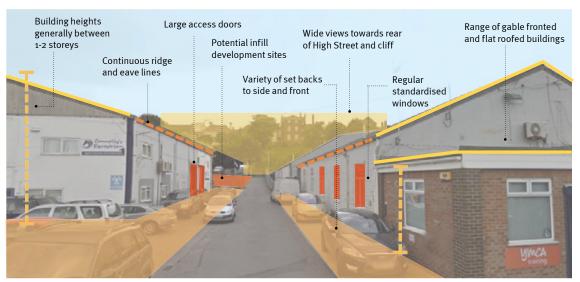




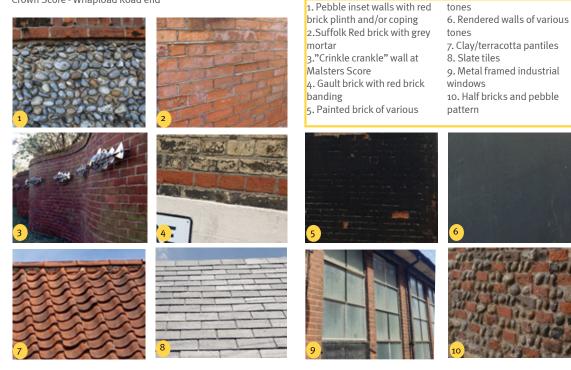
Historical images along the Scores showing traditional typologies and nature of the built form enclosing the space

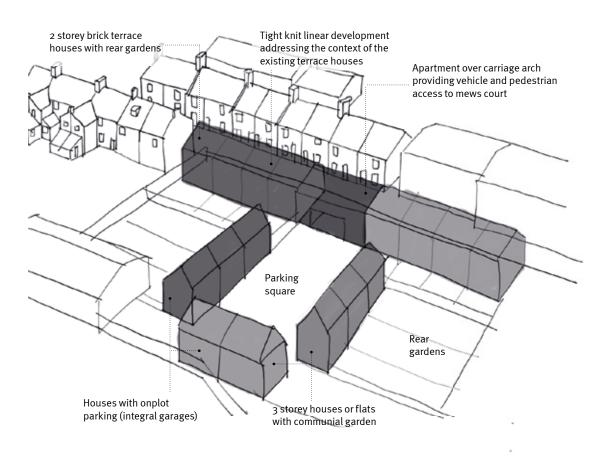


Spurgeons Score - Mid way between Whapload Road and High Street



Crown Score - Whapload Road end





Example backland development plot with frontage to the Scores



- 11. Modern interpretation of simple terraced row houses 12. Contemporary mews court with oriel windows to deflect views
- 13. Simple townhouses with alternating brick and parapet roof
- 14. Example of narrow Mews Court
- 15. Pitch roofed terraced houses with projecting balconies
- 16. Simple terrace with protruding brick detailing 17. Linked detached properties with undercroft parking













### Urban Grain, Movement, Permeability and Legibility

#### **EXISTING MOVEMENT NETWORK**

The movement network in the HAZ is currently dominated by strong north-south vehicular routes, with the A47 dual carriageway having severed a number of historical east-west routes. A number of roundabouts and gyratory systems have further compounded pedestrian movement throughout the HAZ and provide a sense of vehicle domination.

Historically Lowestoft has seen high levels of cycling, which can be seen by the extensive network of cycle routes across the town including the North Sea Cycle Route and Regional Route 12. At present, safe East-West pedestrian and cycle movements are facilitated by a number of toucan crossings on the A47.

The Waveney Cycle Strategy notes the importance of connecting residential areas and community facilities

closer to the town centre. Currently there is a signed, traffic free cycle route along sea front from North Dene to South Beach promenade, and a traffic-free cycle route, leading to an on-road cycle lane along the southern part of the High Street in the HAZ area. The Waveney Cycle Strategy recommends:

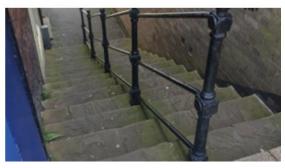
- Improvements to the surface of the North Dene promenade, replacing steps with a ramp and better way-finding measures (ref: L<sub>3</sub>, page 70), and
- Extending the markings along the High Street to improve the visual connection between the A12/Yarmouth Road to the Triangle (ref: L4, page 70).

Bus routes currently run along Jubilee Way (A47) on the edge of the HAZ area, with several bus stops along this road including near the Police Station and near the junction with Crown Street East.









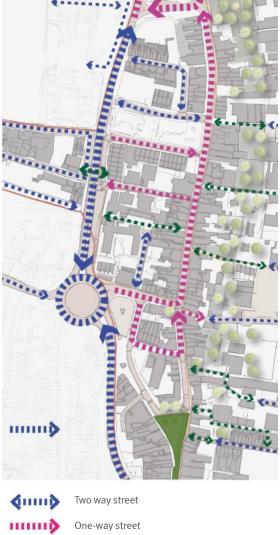
#### **FUTURE MOVEMENT NETWORK**

There is an opportunity to enhance pedestrian priority in the core of the HAZ by reviewing current traffic management arrangements, for example changing the High Street to one-way northbound from Dukes Head Street. This could provide for more footway space for pedestrians, spilling out activities from shops and the opportunity for public spaces at key junctions. Vehicles accessing Rant Score could access the Score from Old Market Street or the northern side of Triangle Market before turning into High Street as opposed to directly

from Duke Heads Street junction as per the current situation.

Better surfaces, markings and way-finding measures for cyclists and bus stops - if bus routes were to be routed along the High Street - could be incorporated into detailed proposals for the High Street subject to further transport modelling and consultation with Suffolk County Council as Highway Authority.





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Pedestrian routes

### **Reconnecting Crown Street**

The A47 is a major vehicle corridor which runs along the western side of the HAZ area and forms a significant barrier to pedestrian movement between the historic core and the residential area to the west. The perception of a physical barrier is also compounded by prolonged runs of brick wall running along the edge of the corridor, which, whilst restricting pedestrian movement over the carriageway, also appears austere and uninviting. Currently there are two signalised pedestrian crossings, one close to the Dukes Head Street roundabout and one close to Albany Road, however there is nothing by way of pedestrian crossing facilities in the central section.

To enhance connectivity and permeability to the HAZ area, provision of a suitable pedestrian and cycle crossing should be considered which would reconnect both ends of Crown Street which have been severed by the A47, helping to restore historical street and

movement pattern. The Waveney Cycle Strategy notes that some east-west routes are constrained by existing road layouts, and the potential pedestrian crossing reconnecting Crown Street will help alleviate this. It is anticipated that proposals would be subject to traffic modelling and further consultation with the Highways Authority. This would be further facilitated by a reclassification of the route upon completion of the Lake Lothing Crossing. Greening to the central reservations would help to soften this generally hard environment, and panelling (potentially laser cut sreening with distinctive patterning) on the brick wall would help to provide interest. Opportunities for utilising the exposed gable fronting the A47 on Crown Street West should be considered - this could include artwork depicting the Crown factory and Grade Il Listed Crown Street Motors building, which is situated a short distance to the west and is a building of architectural and historical interest.





Laser cut screen of street network



Tiger crossing example



Naturalistic planting in verge/central reservation

# 8. Guidance for Public Realm



# 8.0 Guidance for Public Realm

This section outlines aspirational improvements to the public realm throughout the HAZ area, building upon and enhancing the character of each area through the streetscape and public realm. As with all alterations to adopted highway spaces, any changes will be made in partnership with Suffolk County Council as the highway authority and subject to usual consents and approval. Improvements to the public realm will take into consideration and be made with regard to

the Conservation Area Appraisals, and the Waveney Cycle Strategy. In addition to this, it is important to consider using design to address issues such as crime, anti-social behaviour and public transport. The improvement of the above-mentioned elements can aid the overall economic growth and perception of the local area - please see the relevant policies in Section 4 on Designing out Crime strategies. This document is also intended to inform other strategies for Lowestoft.

#### **STREET FURNITURE**

Street furniture, both contemporary and historic, is an integral part of the public realm. It is representative of a place and its individual identity. It is important that the selection of street furniture makes a positive contribution to each area, does not impede access or add to visual clutter, and reflects and enhances its distinctive local character.

The following are general guidelines to follow when applying street furniture to a local context:

**Durability** - All street furniture should be durable and vandal proof.

**Colour** - All metal elements should be either stainless steel or factory powdercoated in black RAL 9004 Signal Black. If not available choose nearest black (for example RAL 9005 Jet Black). This applies to all street furniture including third parties ones (bus shelters and utility cabinets), the only exception being charging points for electric cars.

Positioning - Street furniture should be located so as to not cause an obstruction towards the front of the

footway. In locating street furniture a space of 1.2m is considered to be appropriate to enable access and usability for all.

Avoid clutter - Only add street furniture and signage that is either needed or improves the user experience. Consolidate street furniture locations. Combine street furniture functions when possible and consider street furniture zoning. Where digital infrastructure is provided, it should be integrated within street furniture, for example smart lighting, smart benches, smart waste.

**Heritage** - The starting point should be that wherever possible, historic street furniture should be refurbished, retained and re-sited close to their original location.

**Robustness** - All street furniture should be secured to the ground and any fixings should be flush to avoid becoming a trip hazard. If paving needs to be cut to install a piece of street furniture it should be done neatly. Consider street furniture type and size of foundation and how it might interfere with existing

#### **LANDSCAPING**

Trees and soft landscaping form a fundamental part of Lowestoft's public realm, enhancing the sense of place and local identity, offering seasonal character, providing habitats for a rich array of urban and suburban wildlife and creating valuable summer shade for the public as well as for adjacent buildings. It is critical that we look after the green spaces, trees and planting that already make up part of Lowestoft's public realm, and important that we seek to introduce new trees and soft landscape in urban

It is ideal to steer away from the planting of trees within the historic core, as there is likely to be limited

space beneath ground and there would be a potential impact on the historic street scene as a result of high level planting. This is also a similar case in the PowerPark area due to the harsh climatic conditions however through further research and guidance there could be suitable areas for tree planting within the built environment.

Please note that the locations of SUDS shown within the sketches of this section are for indicative purposes only and that detailed works to establish SUDS locations would be required with the Lead Local Flood Authority (LLFA) and highways authorities.



#### **MATERIALS**

Surface materials should be seen as an integral element of creating, regenerating and revitalising places and spaces, ensuring cohesion and continuity. In order to achieve this, a limited palette with materials that are simple, robust, appropriate to the local character and fit for purpose should be used.

#### General Guidelines:

- The selection of surface material should support a place's local identity and choice should take in to account safety, maintenance regime, and coherence with a wider public realm context.
- Significant historic surfaces should be refurbished, retained or reinstated. This is particularly important within the High Street - as an historic street of exceptional quality - where it is considered appropriate that high quality granite setts are used throughout to emphasis its importance. Consideration will need to be given to ensuring

- their use is appropriate for those with mobility
- Vehicle overrun on footways should be designed out where possible. However, in areas where it might happen, reinforced materials and adequate technical solutions should be applied, such as: reinforced paving, widened kerbs, an increased flag thickness, alternative bedding and jointing type, mesh reinforcement or grass cells.
- Where appropriate, skid resistance should be assessed, for example when using natural stone on trafficked areas.
- Wherever possible, replaced surface materials should be reused on site or recycled.
- Ensure safety features are in place, and are not dismissed at the expense of appearance.
   Features such as non-slip materials and handrails are important along areas of topographical significance.

#### **PARKING**

Changes to the public realm should also be integrated with changes to parking management. Parking is a key element of the public realm and should be designed and managed in order to ensure parked vehicles do not block pedestrian desire lines. Additionally, reducing parking in the area would contribute to reducing car dominance,

Please see the following link in reference to Historic England's Streets for All: Advice for Highway and Public Realm Works in Historic Places document for a more in-depth read into designing public realm in areas such as the North Lowestoft HAZ:

improve local air quality and encourage more sustainable modes of travel.

Improvements to the public realm that affect parking will be subject to, and integrated with parking management and enforcement strategies.

https://historicengland.org.uk/images-books/publications/streets-for-all/heag149-sfa-national/

#### **BIN/REFUSE STORES**

To minimise the impact of refuse on the public realm, communal bins storage areas should be provided within development plots at discrete, easily accessible and serviceable locations. This would be

an appropriate way to manage waste storage away from the street and minimising waste bins becoming an eyesore.

#### **STREET LAYOUT**

Provided the materials palette is in-keeping, sensitive and robust to the local character, proposed street layout changes, such as raised tables and widened pedestrian pavements, can enhance movement throughout the town centre. Additionally, these concepts could also aid in speed reduction of vehicles, in partiuclar along the

High Street and Whapload Road, where this has been an issue in the town cente for a number of years. The use of raised tables can be discovered in numerous other conservation area environments, and so consideration is needed regarding this design element.

# Public Realm Enhancement Identification Map

The concepts on the following pages of this section identify some ways in which movement and the public realm could be enhanced in the area, as indicated by the possible public realm improvements located on the map below. Green spaces, whilst

they would be new features in these areas, could help to improve the aesthetics as well as contributing to wider objectives, such as in relation to climate change and biodiversity.

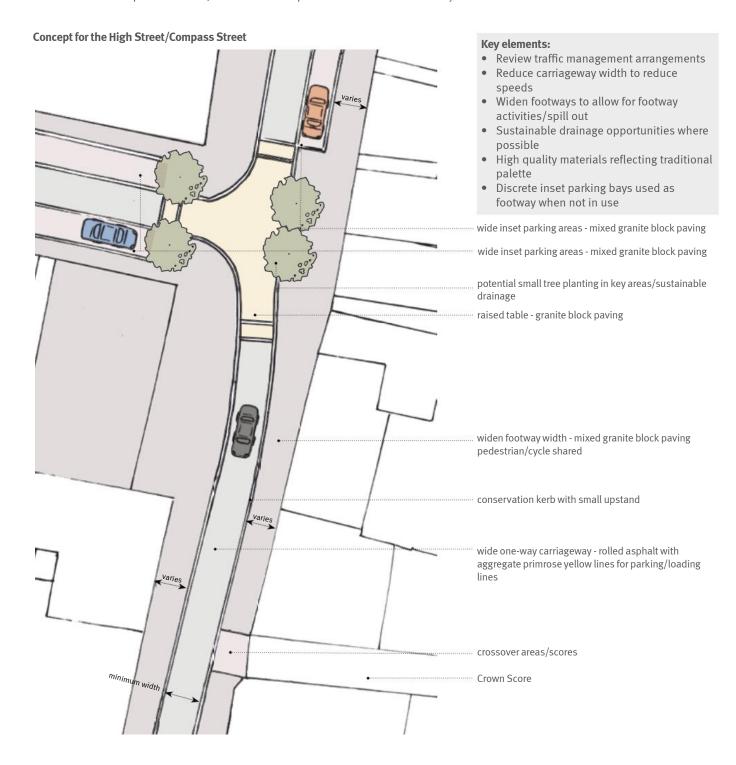


### Historic Core: High Street



The introduction of a raised table could enhance pedestrian movement and aid speed reduction, however would represent the

introduction of a new feature into the area and would therefore need to be carefully considered in terms of its form and materials.

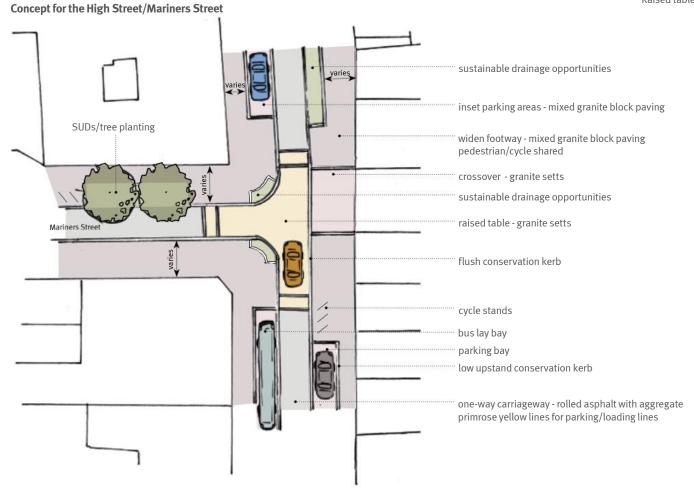


#### **Key elements:**

- Review traffic management arrangements
- Reduce carriageway width
- Widen footways
- Improve entrance to the Scores along the high street



Raised table



The inclusion of some green spaces within the High Street is due to the general view of a very 'hard' environment with little in the way of relief in terms of green space for people to sit and enjoy the surroundings. Green spaces can improve the aesthetics of an area

when treated properly — whilst also attempting to address the climate emergency through introducing potential areas of sustainable run off in discrete locations as well as improving air quality/biodiversity where possible.

#### **Concept for the High Street/Mariners Street**











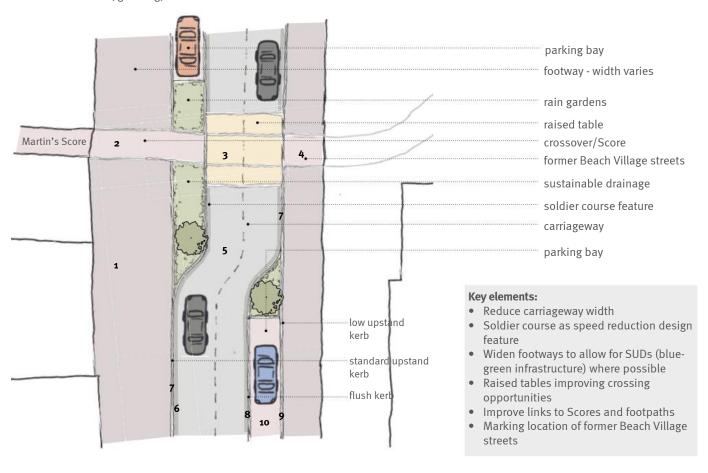
#### **Indicative Palette**

- 1. Footway mixed granite block paving
- 2. Inset parking bays/bus lane mixed granite setts
- 3. Carriageway rolled asphalt with mix of exposed granite aggregates to tie in with footway
- 4. Raised table mixed granite setts
- 5. Green infrastructure sustainable drainage where possible in wider footway
- 6. Kerb conservation kerb
- 7. Score entrance crossover areas mixed red hue tumbled granite setts Yellow lines pimrose yellow

### Concept for Whapload Road - South



The concept here is to create areas of greening and parking which alternates on different sides of the road. Whilst it may appear as a traffic management design, this conceptual layout is to accommodate necessary parking and assist with other elements of the public realm, such as surface water run-off, greening, etc.



#### **Indicative Palette**

- 1. Footway concrete flag paving
- 2. Score & crossover mix of red hue tumbled granite setts
- 3. Raised table concrete block paving
- 4. Former Beach Village street mix tumbled granite setts
- 5. Carriageway rolled asphalt with mix of exposed granite aggregates to tie in with footway
- 6. Soldier course on carriageway granite setts
- 7. Kerb conservation kerb, standard upstand
- 8. Kerb conservation kerb, flush
- 9. Kerb conservation kerb, low upstand
- 10. Parking/loading bays concrete block paving

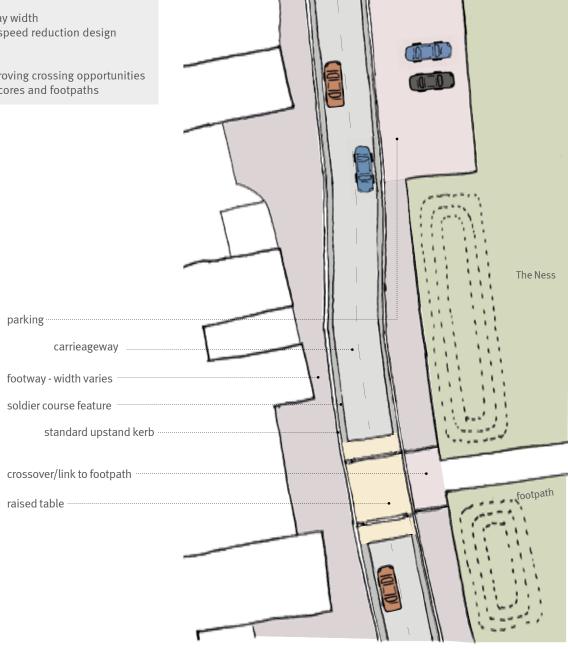
Yellow lines - pimrose yellow

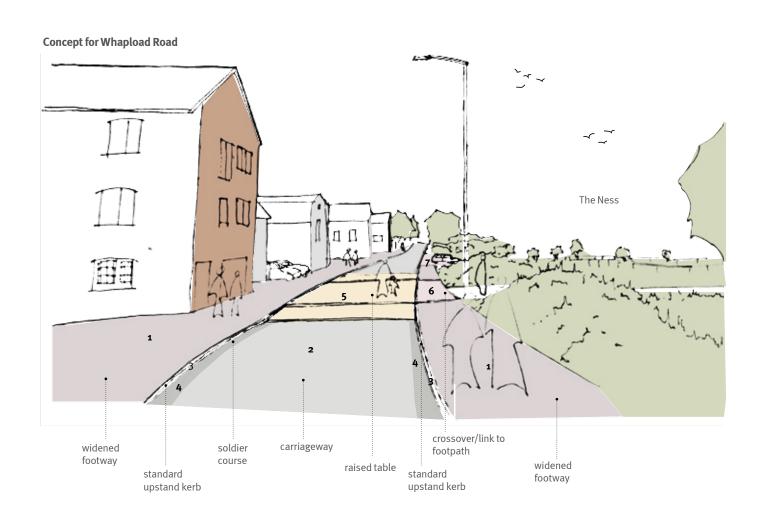
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### Concept for Whapload Road - North

#### **Key elements:**

- Reduce carriageway width
- Soldier course as speed reduction design feature
- Widen footways
- Raised tables improving crossing opportunities
- Improve links to Scores and footpaths





#### **Indicative Palette**

- 1. Footway concrete flag paving
- ${\tt 2. Carriageway rolled \ asphalt \ with \ mix \ of \ exposed \ granite \ aggregates \ to \ tie \ in \ with \ footway}}$
- 3. Kerb conservation kerb, standard upstand
- 4. Soldier course on carriageway granite setts
- 5. Raised table concrete block paving
- ${\bf 6.\ Crossover/link\ to\ footpath\ -\ mix\ tumble\ granite\ setts}$
- 7. Parking/loading bays concrete block paving

Yellow lines - pimrose yellow

Mix granite setts marking entrance to Scores

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# The Scores (vehicles and pedestrians)



The guidance below sets out principles around material use within the Scores. The Scores are of particular significance in the area and the use of appropriate materials is particularly important in preserving and enhancing their character. Consideration would also need to be given to accessibility by all including those with mobility issues

#### **Key elements:**

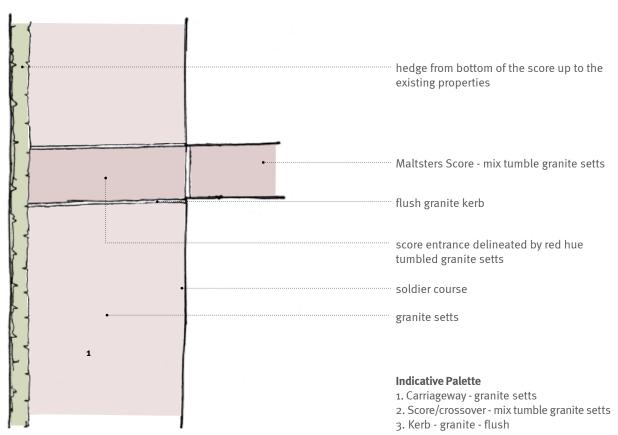
- Reduce carriageway to minimums
- Mix granite setts red hue setts at Score entrances



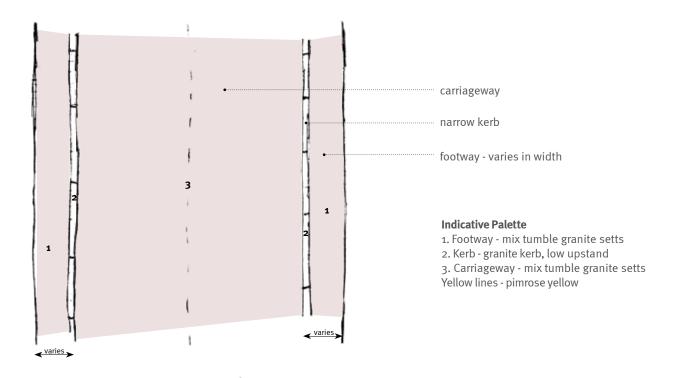




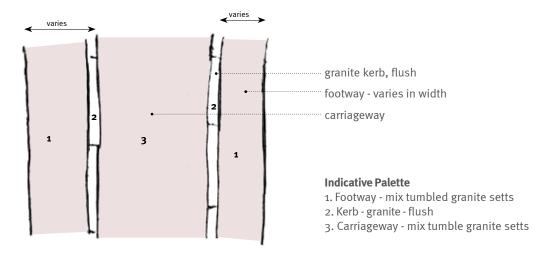
#### SPURGEON SCORE



#### RANT SCORE



#### **CROWN STREET**

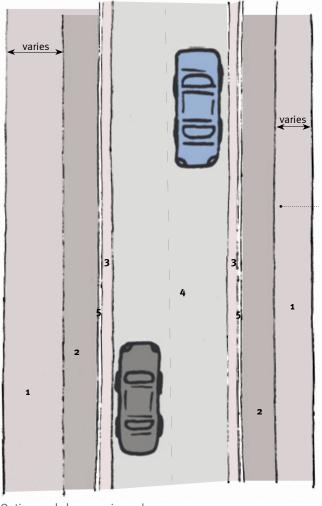


#### HERRING FISHERY SCORE



#### **Indicative Palette**

- ${f 1.}$  Footway mixed granite block paving
- 2. Crossover red hue tumbled granite setts
- 3. Kerb flush granite kerb
- 4. Score mix tumble granite setts
- 5. Carriageway mix tumbled granite setts
- 6. Bollard feature bollard, granite



#### **Key elements:**

- Reduce carriageway width to reduce speeds
- Soldier course as speed reduction design feature
- Widen footways to allow for dedicated cycle lanes

soldier course - setts paving againts conservation kerb, standard upstand

Option: cycle lane or rain garden

#### **Indicative Palette**

- 1. Footway concrete flag paving
- 2. Cycle lane light grey colour tarmac
- 3. Soldier course on carriageway granite setts
- ${\tt 4. \, Carriageway \, \, rolled \, asphalt \, with \, mix \, of \, exposed \, granite \, \, aggregates \, to \, tie \, in \, \, with \, footway}$
- 5. Kerb conservation kerb, standard upstand Yellow lines - pimrose yellow







# Initial materials and street furniture palette

#### SCORES/HISTORIC CORE/BEACH VILLAGE STREETS

It is understood that as with many historical areas, beneath tarmac and modern road materials, that there are original granite/stone setts – some of which can be clearly seen on the Scores in areas where tarmac has eroded away. Bringing back this historical character through high quality paving materials, along with

sympathetic and bespoke street furniture such as lighting columns and benches, is considered essential in enhancing the traditional streetscene.









cast iron/galvanised bollard

traditional wall mounted lighting

timber/cast iron tumbled granite setts

#### WHAPLOAD ROAD/POWER PARK/WILDE STREET

Pedestrian and cycle focus. Improving pedestrian and cycle experience by reducing the width of the carriageway, introducing raised table on crossing areas, design features to reduce traffic speeds, and the provision of contemporary-style cycle racks wherever possible to encourage alternative travel to traditional

vehicles. The ethos of 'grey to green' and responding to the climate change agenda is also important in these areas. This can be achieved through improving the environment by integrating blue and green infrastructure including tree planting and both on and off street SUDS along major corridors.



Mix of granite and concrete materials with a more contemporary approach

### **Key Public Spaces**

#### **BLUE ANCHOR SQUARE**

The junction of the High Street with Dukes Head Street and Rant Score acts as a key node along the High Street, marking a decision point for movement as well as assisting with orientation and wayfinding for visitors. Rant Score itself offers a framed view down towards Gulliver and the seafront which assists in connecting the High Street to its industrial maritime setting and history.

There is an opportunity to build upon the current small area of public space outside the Olde Blue Anchor pub which makes best use of the proposed narrowing of High Street and Dukes Head Street to create a larger public square which could be used as spilling out space for the pub and adjacent restaurant premises as well as for other occassional small scale events. The square would adopt the palette of materials proposed for the High Street, utilising granite flags

and setts, together with distinctive street furniture inkeeping with the High Street's traditional theme.

A feature such as a raised table could cover the junction, encouraging speed reduction and ease of pedestrian movement across the space whilst additional small species tree planting could be provided within areas of widened footway to help expand upon the presence of two large existing trees within the area.

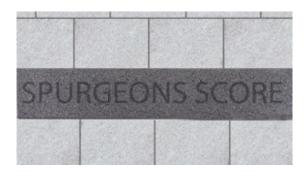
Rant Score, as with all the Scores where they intersect the High Street, could be demarcated by red/pink granite setts - with access potentially via the High Street only, requiring vehicles to perform a 'loop' around the north side of the Triangle Market as opposed to from the Dukes Head Street end.

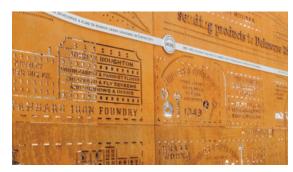


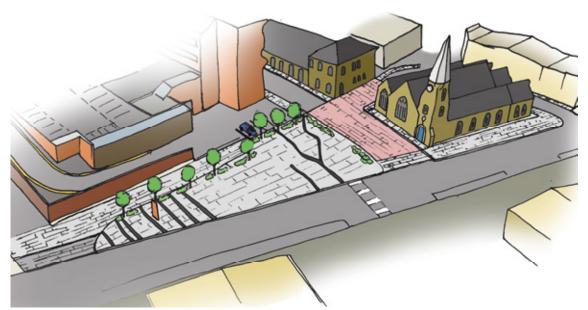
#### **GATEWAY TO THE SCORES**

An opportunity exists to enhance the public realm outside of Christ Church to provide a gateway to the HAZ and recognise the importance of the 11 Scores. This location is significant given it ties in with the eastern end of Herring Fishery Score, the southernmost of the existing Scores and therefore the space could be defined as the 'Gateway to the Scores'. This conceptual idea would allow for the continuation of the red/pink granite setts at the entrance to Herring Fishery Score in front of Christ Church, with the 'square' itself also being in granite flags with granite 'planks' outlining the pattern

and alignment of the Scores from south to north. The granite beams would be etched with the name of the Score it represents and a corten monolith at the southern end could be laser cut outlining information about the Scores or key dates and or events which took place in the area. Some planting to the edges of the square , along with integration of SUDS features, would also help soften the wall of the adjacent police station building, whilst access to/from the building would be maintained by way of a flush surface with minimum kerb upstand.







#### **UTILISING HIGHER LEVELS**

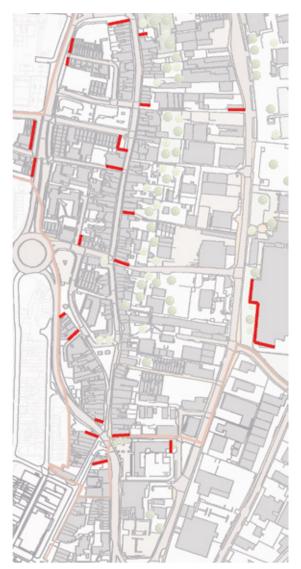
There are numerous opportunities across the HAZ area, and particularly in the historic core area to utilise flank walls and exposed gable ends. Consideration should be given to how these canvasses could be used to help reinforce the sense of identity and enhance the sense of place for zone in which they are situated.

Examples are provided below of how these elements could be created. The plan overleaf highlights locations where key elevations could be enhanced. The first image shows the exposed gable end fronting

onto the Triangle market area, which could be used to tie in with the maritime theme of the historical core, with the second providing utilising the exposed flank wall fronting onto the gateway to the High Street from the north which highlights script from a poem called 'The Lowestoft Boat.







Map highlighting key street elevations identified within the Lowestoft HAZ boundary

#### **KEY ELEVATIONS FOR ENHANCEMENT**

- 176 High Street
- Royal Falcoln Hotel, High Street
- 4 & 6 Albany Road
- 40 & 41 High Street (Mariners Score gateway)
- 13 Dove Street & Crown House
- 22 Crown Street West & 14 Factory Street
- 231 Whapload Road
- 152 High Street & 22 Compass Street
- Crown Hotel, Corner of Crown Street East
- 60 High Street (Martin's Score gateway)
- Birdeye Factory West and South elevation
- 41 St Peters Street
- 29 St Peters Street
- 114 High Street (Artillery Way elevation)
- 185 London Road North
- 108 High Street (Gateway to Herring Fishery Score)
- 183 London Road North
- Police Station boundary wall Christchurch Square

### **Plant Palettes and Zoning**

#### INTRODUCTION

Due its coastal location, street planting within the Lowestoft HAZ area faces some significant barriers and challenges for healthy plant growth, these include sometimes severe salt-laden winds and greater exposure to climatic elements. This can be exacerbated by pollution and run-off from the highway.

To address the specific conditions which would be required to be tolerated by street planting within the HAZ, a list of indicative species have been identified below which are considered suitable plants for establishment within the HAZ streetscene.

There could be opportunities for the local community to take more responsibility for the maintenance of planting and greenery through the provision of

flexible planting schemes, incorporating a number of edible plants and herbs. For example, by providing suitable areas for growing chive, sage and thyme may encourage residents to grow their own food at a local, small scale. This would in turn improve the natural connection between the people of Lowestoft and the food they eat, which will become increasingly important as issues with climate change are more prevalent in today's society.

To ensure variety and a mix of form and structure, the list includes a mix of trees, shrubs and flowering plants which will add good effect to street environments. The planting palette has been broken down into groups, and are identified as being appropriate to each of the HAZ character zones using the icons.

#### **INDICATIVE PLANT PALETTES**

Trees tolerant of full exposure to sea winds:

Carpinus betulus Quercus robur Quercus ilex Pinus nigra











Trees for planting slightly back from the sea:

Betula pendula Ginkgo biloba Griselinia littoralis Pinus sylvestris







Shrubs for exposure to salt winds:

Sambucus nigra Rosa rubiginosa Tamarix tetrandra Pyracantha rogersiana











Shrubs for open areas slightly back from the sea:

Buddleja davidii Lavandula angustifolia Ceanothus 'Autumnal Blue' Cistus criticus







Shrubs for hedges with some protection from direct sea-wind:

Prunus spinosa llex aquifolium Hebe salicifolia Fuchsia magellanica





Wildflowers for coastal areas (used for creating wildflower verges):

Sedum acre
Sedum anglicum
Oenothera biennis
Crithmum maritimum
Spergularia rupicola
Triglochin maritima
Silene uniflora
Saponaria officinalis
Armeria maritima











Please note that the list of species provided above are purely indicative, based upon the Royal Horticultural Society's (RHS) recommendations. For a more detailed list of plant species suitable for coastal environments, please follow the following link to the RHS wesbite: https://www.rhs.org.uk/advice/profile?pid=472



























# 9.0 Guidance for Alterations

#### **ALTERATIONS**

The HAZ area contains a wealth of historic listed buildings within and outside of the conservation area which contribute significantly to the sense of place and unique identity of the area. These buildings and designated areas are protected in planning law due to their historic or architectural interest, and it is important that alterations to these structures do not adversely affect their character and significance. It is also important to consider that for older buildings, alterations may have occurred across the life of the building which can contribute positively to its interest, however unsympathetic alterations to historical buildings can cause severely negative and longlasting impacts on a building. For this reason, it is the responsibility of the home or building owner to ensure that any proposed alterations are sympathetic and advice should be sought at the earliest opportunity from East Suffolk's Design and Conservation department at conservation@eastsuffolk.gov.uk. All aspects of listed buildings, including the interior and exterior, including additions such as signage, which fall within the historical curtilage of the listed building are protected.

In considering alterations to a listed building, the level of harm caused by an alteration is required to be determined by an appropriately qualified professional. Some works which do not affect the listed buildings character, including small scale works, like-for-like repairs or repainting as per the

existing, re-wiring and internal heating installation or repair for example could be included within this category. More intrusive, or larger scale repair works, including windows and door replacement, flues and extractors etc. require discussion with East Suffolk's Design and Conservation team. An application can be made for Listed Building Consent (LBC) on the Council's website: https://www.eastsuffolk.gov.uk/planning/planning-applications/making-a-planning-application/

LBC is required for all works of demolition, alteration or extension to a listed building that affect its character as a building of special architectural or historic interest.

The requirement applies to all types of works and to all parts of those buildings covered by the listing protection (possibly including attached and curtilage buildings or other structures), provided the works affect the character of the building as a building of special interest.

It is important to note that undertaking alterations to a listed building can constitute a criminal offence, should work have been undertaken without the required consents in place, the building owner is responsible and could face imprisonment, an unlimited fine, or both and rectifying the situation at their own cost.

# 9.1 External Alterations

#### **HISTORIC WINDOWS**

Historic windows can be key features of a historic building and enhance its character. They can tell the story of a building, and contribute to its overall appearance both as part of the original design or as deliberate later alterations to reflect changing styles. Windows of interest should be retained wherever possible, using careful matching repairs. Advice from the Council's Design and Conservation team should

be sought to ascertain the special interest of windows before any changes are made and for guidance on LBC.

Further guidance can be found on the Historic England website: https://historicengland.org.uk/advice/yourhome/making-changes-your-property/types-of-work/ alter-my-windows/

#### **EXTENSIONS**

Extensions to historic buildings must be carefully considered, as they have the potential to harm the character and significance of the building.

Generally, it is considered important that additions are sympathetic to the original grain and material of the building and subservient in design.

Any extension to a listed building will require LBC and may also need planning permission, so it is important to get in touch with the Council's Design and Conservation team at the earliest opportunity. Further guidance can also be found on the Historic England website: https://historicengland.org.uk/ advice/your-home/making-changes-your-property/ types-of-work/extend-my-house/

#### **EXTERNAL DECORATION**

Regular external decorating is an important part of maintaining a historic building, preventing long term harm from weathering and preserving the character of the building and surrounding area. It is important that the correct materials are used, in order to ensure the paints are breathable, and do not work against the building to trap moisture within the walls.

If you need advice about decorating houses from particular historical periods, the Georgian Group and Victorian Society publish helpful leaflets and guidance.

Further information can also be found on the Historic England website: https://historicengland.org.uk/ advice/your-home/making-changes-your-property/ types-of-work/redecorate-my-house/

#### **ENERGY EFFICIENCY AND HISTORIC BUILDINGS**

The impact of installation (and potential later removal) of a photovoltaic (PV) system to a historic building should be considered for all component parts: reversibility; replacement tiles and slates; impact to significance and setting of heritage assets; level of harm of the proposed PV system to the historic building; location, orientation and tilt; and shading.

Additions of solar panels to a listed building will require LBC, so it is important to get in touch with the Council's Design and Conservation team at the earliest opportunity.

Further information can also be found on the Historic England website: https://historicengland.org.uk/

#### **FURTHER GUIDANCE**

https://historicengland.org.uk/advice/your-home/making-changes-your-property/

https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/

https://historicengland.org.uk/advice/hpg/assistanceforowners/maintenance/





## 10.1

# **Shopfront Guidance**

Please see a link to Historic England's recently published research report "The Shopfronts of Lowestoft High Street, Suffolk: Research and Investigation"

https://research.historicengland.org.uk/Report.aspx?i=16230&ru=%2fResults.aspx%3f-p%3d1%26n%3d10%26t%3dlowestoft%26ns%3d1

#### SHOPFRONT GUIDANCE

This section of the Design Guide focuses on establishing best practice guidance, design and detailing of all shopfront applications within the North Lowestoft Heritage Action Zone area. This guidance is supported by Historic England and reinforced by their historical analysis of the traditional shopfronts found within Lowestoft, including the style and likely origin of surviving shopfronts while highlighting lost examples that appear in archived plans and images.

Any alterations or new shopfronts should be considered in the context of the wider street scene. Shopfronts should relate to one another in terms of scale and location. The relationship between individual properties can contribute to an overall character, which creates an environment in keeping with the historical character of the area.

#### **OVERVIEW**

Lowestoft High Street is dominated by an array of historic shop frontages, many of which are occupied by local independent and specialist retailers. Despite a number of properties located along the High Street having endured alterations or inappropriate changes, (such as the insertion of uPVC doors and windows and the installation of illuminated signage), they have

largely retained their historic aesthetic and together create a characterful and visually positive commercial streetscape. The better preserved area of the High Street is to the southern end; the northern area was subjected to substantial bombing in the twentieth century.

#### PURPOSE OF THE GUIDANCE

The purpose of this section is to provide appropriate reference information and guidance to applicants and the local authority to support the successful applications to improve, restore and alter shopfront designs. The guide provides a practical staged checklist

to help support all planning applications.

Example Lowestoft shopfronts have been placed at the end of this section, to provide contextual analysis to the good and bad elements of shopfronts on real-life case

#### **HISTORY**

Many buildings along Lowestoft's High Street date from the sixteenth century onwards; however, as the majority of these have been refaced to reflect changing fashions, the overarching aesthetic of the High Street is now Victorian. A common feature of these frontages from 1890-1900 is the use of short double brackets to consoles, occasionally applied directly to the fascia where it was used to define a side entrance. Throughout the Edwardian period, shop front lobbies became increasingly pronounced and deeper, with art nouveau influences evident in decorative features.

Shopfront designs during the inter-war years shifted away from traditional forms and materials in favour of modern, minimalist approaches. This continued largely into the post-war period, with shopfronts from this time

favouring simplicity and flexibility of use. Into the late twentieth century, signage became more dominant with detail focussed on window displays rather than exterior architectural detail. Some examples of contemporary style shopfront designs characterised by the use of structural glass and minimal external signage can be found on the High Street.

Any alterations or new shopfronts should be considered in the context of the wider street scene. Shopfronts should relate to one another in terms of scale and location. The relationship between individual properties can contribute to an overall character, which creates an environment in keeping with the historical character of the area.

#### PLANNING FOR WORKS TO SHOPFRONTS

Initially it is suggested that you contact the Local Planning Authority to determine the approach and extent of the shopfront works. It is advisable to employ an experienced design professional when undertaking work on your shopfront; partnerships between architects and shopfront fabricators tend to be the most successful and provide the best results. They will be familiar with various design options materials available and as a result can produce design solutions that resolve potentially time consuming and costly issues between the planning department and applicant.

A shopfront planning application submission should include:

• A location map at a scale of 1:1250

- A plan of the shopfront showing the structural elements within which it fits, (i.e. the pilasters) and (the dimensions of) the opening width of doors.
- An elevation of the proposed shopfront and signs showing part of the adjoining shop units and upper floor.
- At least one cross section from the first floor window cill to pavement level, including the fascia.

NOTE: Drawings should be at a scale of 1: 50 or 1: 20 (for details) and all materials and colours should be annotated

#### **DESIGN APPROACH**

A planning application for a new or remodelled shopfront should be accompanied by illustrations and supporting documents which set out a logical case for the submitted design. For Listed buildings a Heritage Statement will also be required to justify and substantiate the application.

The constraints and opportunities of a site identify what might be acceptable in the established context and this forms a good basis from which to begin developing designs; Historic England's analysis report of Lowestoft shopfronts is a useful starting point.

#### SHOPFRONTS AS A STREETSCAPE

Any alterations or new shopfronts should be considered in the context of the wider street scene. Shopfronts should relate to one another in terms of scale and location. The relationship between

individual properties can contribute to an overall character, which creates an environment in keeping with the historical character of the area.

#### SHOPFRONTS AS PART OF AN ELEVATION

The shopfront should be considered as an intrinsic part of the overall appearance of a building. It should appear to be perfectly related to the upper floors in structural concept, proportion, scale and vertical alignment. All the elements of the elevation should

closely relate to express an effect of logical visual harmony and historic character. The design principles evolve from a response to site context for example building form, character, access and topography.





Traditional shopfront fanlight above front door, bounded by two wood pilasters.



Example of panelled stallriser on traditional shopfront.

Traditional shopfront elements based on example building found in Lowestoft HAZ region - example of typical good design.



#### **SHOPFRONT REPAIRS**

Where a shopfront is to be replaced, an evaluation of the quality of the existing shopfront and the viability of repairs should be the first consideration. Where part or all of a shopfront is to be replaced or altered, the design of the new elements should take into account the principles and character of the original design. Distinctive, original designs of high quality in terms of design, detailing and materials will be encouraged.

#### **GUIDANCE FOR SHOPFRONTS**

Whatever the character, success of the design is usually dependant on the standard of craftsmanship and care. It is important that traditional, local skills are not sacrificed to cut corners or save money, resulting in a poorly finished product. Sometimes the problem is side-stepped by utilising standard factory-made components, but these inevitably require the use of unsympathetic materials and present a mass-produced, one-size-fits-all appearance. To some extent the problem can be minimised by skilful design, making use of easily available materials

without costly fabrication, but arranged to make interesting architectural effects.

A new shopfront for an attractive historic building will require a high standard of craftsmanship in order to realise a design of quality and originality. Where this utilises classical or historic elements these should be as authentic as possible. Once again, the use of traditional craftsmen and local skills would be preferable.

#### **MATERIALS**

Materials should be chosen to emphasise the historic character of the area and to reinforce the visual unity of the street scene. Painted timber is the prevalent shopfront material of virtually all historic streets and should generally form the basis of new designs. The use of varnished, natural or stained hardwoods and softwood is almost always inappropriate, being alien to the existing pattern and also to the painted timber features of the upper floors. Materials such as rustic stonework, ceramic products and other materials such as marble should be avoided for most Conservation Area street scenes.

Plastic sheets and anodised or plastic-coated metals, in most cases, should not be used, as these are

generally unsympathetic when viewed in combination with natural textures. Many of these materials also have glossy surfaces, and their reflective qualities emphasise every imperfection in the fitting and jointing of the panels.

The use of a plastic fascia and projecting box signs associated with internally illuminated advertisements are generally an unattractive feature and will normally be out of place in historic shopping streets, and specifically on listed buildings. Painted timber fascia, therefore, will normally be required throughout the town centre Conservation Area.



#### DETAIL DESIGN AND CRAFTMANSHIP

Shopfronts generally have to bear very close inspection as a direct result of their function and purpose, any coarseness in detail design and construction workmanship will be immediately apparent. Although present day shopfronts usually have a fairly short life, they should be designed to be

permanent solutions. A rapid sequence of alterations is often linked to business closures, branding changes and/or poor workmanship, getting the design right from the outset will undoubtedly save time and alteration costs.

#### **DISPLAY**

For some kinds of shop, the window area has become simply a means of lighting and viewing into the shop interior, with the unfortunate result that the extent of the internal floor space is greatly emphasised. For most situations, the traditional English timber shopfront is appropriate, with the window designed as a showcase of limited depth with a glazed or shuttered back. This would provide space for a display of a typical selection of goods or for special items.

An additional detailed design problem which should not be overlooked is the provision of sunblinds. If these are required they should be incorporated into the design of the shopfront, with the blind box itself as slim and unobtrusive as possible. 'Dutch blinds' should be avoided, as they require additional vertical housings and their sidings tend to obstruct the street view.

#### **COLOUR**

The colouring of a shopfront should be determined by the need to harmonise with the rest of the building and street scene, and to emphasise the important design elements.

There are well-established procedures for the painting of classical designs, such as the gilding or picking out of mouldings, capitals and fluting. Care should be taken to emphasise the structural logic of such a design by using the same base colour for pilasters and fascia.

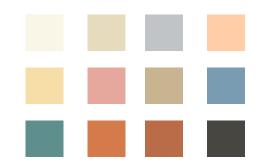
Where natural materials abound, earth colours are generally advisable and high intensity hues should be avoided, particularly on north facing or poorly illuminated frontages. It is useful to remember that

'cold' colours will normally give the effect of recession and 'warm' colours that of projection.

The shopfront should be painted to harmonise with the upper floors of the building and to reinforce the overall effect of unity throughout the façade. This, of course, can increase the 'impact' of the shop in the street scene. The Local Planning Authority should be contacted for all colour changes for all buildings within the Conservation Area.

A suggested indicative palette of materials based upon the Suffolk Coasts and Heaths AONB palette for buildings is included below and provides a range of soft tones which would be considered appropriate in the Historic Core of Lowestoft.





#### ADVERTISEMENT MATERIAL

Information, whether in the form of lettering, signs or symbols, must always be considered as an integral part of the composition of a building. Therefore any application for a new shopfront should indicate details of such lettering and signs. In selecting forms of advertising, the character of the area, the building and the particular business should all be taken into account.

Advertising lettering and signs, used in excess of the name of the business and the service or goods supplied should be limited within the Conservation Area. In the majority of cases it should be discouraged. Where it is incorporated, it must be designed with particular regard to the form and elevations of the building.

If window-area is not necessary for display of goods or lighting it should not be obscured with posters and or laminated prints. Where display requirements are such that large windows are unnecessary, the opportunity should be taken to limit the glass area and adopt a showcase approach.

The use of window vinyls to cover shop windows should be avoided within the Conservation Area as the loss of views into shops, or of window displays, can have a detrimental and deadening effect on the streetscene. Sensitively designed window vinyls which only cover part of the shop window or provide additional, well detailed signage may be acceptable. Where full window vinyls currently exist, this should be seen as an opportunity for enhancement. If the use of window vinyls is considered to be unavoidable in some instances, they should be used as a place making exercise to enhance the historic character of the area, perhaps through the introduction of features such as historic imagery.

Advertisement hoardings, except those around construction sites, are unacceptable in Conservation Areas as they are totally alien to the architectural and street scene. Signs should be kept to the essential minimum and integrated with the buildings.

#### LETTERING AND SYMBOLS

In general, serif letters\* are more appropriate than enlarged type-faces as they are more strongly defined, have better articulation. Individual letters should neither be too widely spaced nor cramped together, as legibility will be impaired. Italic letters is generally unsympathetic to buildings, as the diagonal emphasis conflicts with the vertical and horizontal emphasis of the building. Lettering, logos and symbols should be regarded as minor points of emphasis on a building and should not conflict with the major focal points of a façade, even though they are intended to attract business. Free-standing metal or cut-out wooden letters can be useful because their depth can give them apparent visual weight, although this type of letter should be used with care, as in sharp perspective it can become difficult to read.

Painted lettering with shading can also provide visual intricacy.

Individual letters must be well-proportioned and compatible in visual weight one with the other. The actual size of the lettering should be determined by the need to be reasonably legible to pedestrians, not unduly obtrusive in relation to the building façade, and integrated with all the other elements making up the street scene.

\* In typography, serifs are semi-structural details on the ends of some of the strokes that make up letters and symbols.





Example of shopfront with 'A' framed board outside the entrance, along the pedestrian walkway.

#### A-BOARDS

A-Boards are generally placed outside the shopfront (see example image) and are used to advertise and inform the public of products and business services. The abundance of street signs can clutter up streets both visually and, in the case of 'A' frames, physically. The placement of A-Boards can cause obstructions for disabled people, blind people, elderly people and parents with prams. Often the boards force people into stepping into the road to get past them. The council recognises the need to ensure that the use of such boards is controlled to support these groups.

In terms of this guidance the term 'A-Board' includes all types of adverts, directional signs, information signs and inanimate characters placed without permission.

This guidance only applies to boards placed upon the public highway, (which includes footpaths, paved areas and pavements) and/or attached to highway property. It does not apply to boards on private property, including privately owned shopping centres. A separate policy exists to deal with placards, adverts placed illegally on street furniture. See the planning portal for more information.

The sale of goods on the highway will be dealt with separately and do not fall within the scope of this policy.

If a trader wishes to use A-boards, they need to ensure the free passage along footpaths and to maintain a clutter-free High Street and must comply with the following criteria:

- Boards should not exceed o.6m.sq. with a maximum base of o.6m. It is the intention of the Council to work with traders to produce a standard sized board,
- The board must be 2 sided. The structure must be of sufficient weight or design to prevent it being blown over in the wind,

- The position on the pavement must be consistent on a day by day basis and allow a minimum of 1.8m free passage on the pavement,
- Boards leant against walls, buildings, landscape/ trees, fences and sign/lamp post columns will not be acceptable,
- Boards must be in good condition and appear professionally made, e.g. proper sign writing, painting/printing. Offensive content will not be tolerated.
- One A-Board will be allowed per customer entrance in the premises,
- Where a business has its own private forecourt adjacent to the highway, any A-Board shall be placed wholly within this forecourt,
- Where it is on the highway, A-Boards must be positioned outside the premises, on the same side of the road, and in front of the frontage,
- A-Boards will be placed at the back of the footway as near the property as possible,
- Boards must not be attached to street furniture, trees and others items within the highway (including pavements),
- Boards must be taken in at night or when the firm is closed,
- Boards must not impede vehicular emergency access.
- Where an accumulation of boards and/or other advertising techniques mean that the pavement is not easily useable, all must be removed until agreement is reached as to what is acceptable,
- Where a specific sign is identified by the Council as creating a hazard for pedestrians and particularly the disabled or visually impaired, the owner must respond reasonably and promptly by relocating or removing the sign. This includes hazards created from a sign being blown over in exceptionally strong winds or knocked over by passers-by,
- Rotating cylinders will not be acceptable.

#### HANGING SIGNS

There is a long tradition of hanging signs throughout Lowestoft as a way of conveying information to the pedestrian. Where a fascia is undesirable, a hanging sign might be a useful alternative.

Hanging symbols were popular before the late 18th century when the population was largely illiterate. These signs were restricted by statute in 1797 because of the hazard they posed to horsemen and pedestrians. Hanging signs may be seen as a way of alleviating street clutter and visual congestion.

All hanging signs within the town centre should comply with the following criteria:

- Design should be of high quality and should relate to the character of the building in terms of size and scale,
- Signs should integrate with the fascia sign, echoing colours and graphics, and should not be overly intrusive in scale,
- Signs should be either traditional (hand painted in wood or stove enamelled swing signs on wrought iron brackets) or, if modern in material and design, they should be of high-quality materials and well

- designed to respect their surroundings,
- Wording should be restricted to the name and type of business only,
- The hanging sign must be sensitively positioned to ensure that it is not in conflict with the architecture of the building. Normally this will mean at fascia or just above fascia level. The minimum ground clearance is 2.4m over footways with 0.5m clearance from the edge of the carriageway, whilst a clearance of 2.7m is more appropriate for cycleways,
- Limited to 1 hanging sign per building,
- Lighting should only apply where there is an evening use to the building. Lighting should generally be by unobtrusive spotlight,
- Projecting box signs and internally illuminated signs are generally not be appropriate,
- Imaginative designs using local artists should be encouraged, particularly where they respect the tradition of hanging signs (e.g. the use of symbols) and enhance local distinctiveness,
- Hanging signs which exist over the highway will require a license from the relevant highways authoritatives.

#### **MATERIALS**

Materials should be chosen to emphasise the historic character of the area and to reinforce the visual unity of the street scene. Painted timber is the prevalent shopfront material of virtually all historic streets and should generally form the basis of new designs. The use of varnished, natural or stained hardwoods and softwood is almost always inappropriate, being alien to the existing pattern and also to the painted timber features of the upper floors. Materials such as rustic stonework, ceramic products and other materials such as marble should be avoided for most Conservation Area street scenes.

Plastic sheets and anodised or plastic-coated metals, in most cases, should not be used, as these are generally unsympathetic when viewed in combination

with natural textures. Many of these materials also have glossy surfaces, and their reflective qualities emphasise every imperfection in the fitting and jointing of the panels.

The use of a plastic fascia and projecting box signs associated with internally illuminated advertisements are generally an unattractive feature and will normally be out of place in historic shopping streets, and specifically on listed buildings. Painted timber fascia, therefore, will normally be required throughout the town centre Conservation Area.

#### **EXTERNAL LIGHTING**

External lighting should be subtle in design, showing sensitivity to the historic character of Lowestoft and respectful of the historic fabric of buildings. It must take into account the colour and reflectivity of the building surfaces surrounding it, the colour or operating temperature of the lamps, the strength of luminosity, and their effect on building

materials. It is likely that only evening-opening businesses will require external lighting as streetlights should be adequate to illuminate other shop frontages.

#### SIGN LIGHTING

Externally mounted trough lights may be acceptable in some circumstances, but it is considered that they should form part of the overall design and not appear an afterthought.

Carefully arranged trough lighting designed as an integral part of the fascia can be considered acceptable. Discreet spot-lighting of signboards may sometimes be appropriate.

#### **SECURITY**

Proposals for security should be considered during the design stage to ensure they do not appear an afterthought. Any security measures should be an integral part of the shop front design and should endeavour to provide the least visually intrusive measures. For example, avoiding external shutters and solid shutters in favour of internal security grilles can minimise the impact that security measures have on the streetscene and prevent dead frontages.

Where fire or burglar alarms are required, they are best incorporated on centrelines between upper windows or within recessed doorways. Alarms should never be sited on historic architectural features such as corbels or pilasters.



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#### SHOPFRONT EXAMPLES



An example of a modern infill with a traditional timber shop-front. Most of the traditional shop-front elements can be seen and the colour scheme is sympathetic to the conservation area.



Another traditional shop-front with a co-ordinated colour scheme, signage and window display. See this guidance for further advice notes on the appropriate use of A boards.



A traditional shop-front, designed and installed to the principles of this guidance. The currently vacant unit provides an ideal template for future tenants to apply their own brand.



This traditional shop-front is an example of a business applying its branding to a restored structure. Colour choice should be approved by the Local Planning Authority.



A shop-front and building working as one single element. The colour scheme, detailing and design are appropriate for this building.



A traditional shop-front making use of the glazed front windows to display its good and products. Again the shop-front is appropriate for the building.

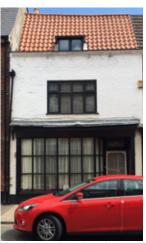
#### **SHOPFRONT EXAMPLES**



The dominance of the laminated signage and illustrations of food detract from the building, shop-front and street-scene and should be avoided.



This infill shop-front is subtle in this location. The use of security bars and shutters should be designed in a more appropriate manner without compromising security.



The change of use from shop or pub to residential should always be a carefully designed transition allowing for the original uses to return in the future.



A contemporary shop-front for a cafe represents a substantial investment for the business and can work well on the right type of building and location.



Window displays are a key element of the shop-front. The 'showcase' option applied to the shop above allows for privacy while still offering some variety to the street-scene.



Getting the details right is a key element of successful shop-fronts. The detailing and paintwork on this shop-front and door work well.

#### SHOPFRONT EXAMPLES



As retailers change the shop-fronts remain and become altered to suit the new business rather than trying to restore or re-establish the original shop-front design. This example represents a sizable investment in the building and shop-front to showcase the

restaurant. Subtle changes to the lighting, colour scheme and typology would have improved how this shop-front responds to and is part of the Lowestoft street-scene.



The majority of national retailers seek to install standard branding and colour schemes to their shop-fronts and commercial units. These are often applied without consideration for the building or street-scene by simply utilising the previous shop-front design, which in many cases had already been inappropriately altered. There are some exmples

however of good design, where national retailers have designed their shopfronts appropriately, in response to the historical building which hosts their business units. Where possible, these businesses should seek to design appropriate shop-fronts which are sympathetic to the building and conservation area.



# 11.0 Appendix

### ORIGINAL NORTH LOWESTOFT HAZ BOUNDARY



Map of original North Lowestoft HAZ boundary

#### NORTH LOWESTOFT CONSERVATION AREA MAPS

The North Lowestoft Conservation Area was designated in 1973 and was extended to the north in 1996 and to the south in 2003. The North Lowestoft Conservation Area Character Appraisal was published in March 2007 and seeks to cover a number of important issues relating to how development should come forward within the Conservation Area.

The appraisal sets out that the purpose of the conservation area is not to prevent new development or

stifle the area's economic growth potential, but that particular consideration and a high degree of attention should be paid to design, repair and maintenance in the area, The purpose of the appraisal is to help preserve and enhance the North Lowestoft conservation area through:

- Describing the character of the area
- Identifying its special character
- Putting forward a basis for effective policy control of development; and
- Identifying proposals for its enhancement

The appraisal is of significance to this Guide as it covers a large area of the HAZ, particularly around the High Street and Scores and therefore its contents are highly relevant and applicable.



Map of existing North Lowestoft Conservation Area Boundary

#### The Bellevue Character Area

Characterised by its public parks, wide sea views and its broad streetscapes lined by villas and houses set within mature leafy gardens, this area is primarily residential but also provides recreational facilities. Most of the development in the area was constructed between 1870 and 1920. The public parks of Bellevue and Sparrow's Nest located on the cliffside provide significant open, green spaces within the heart of the town. Bellevue Park retains its Victorian character with meandering paths and excellent views to the sea, whilst Sparrow's Nest, as the former garden to an early nineteenth century villa is more enclosed.

#### The Denes Character Area

This area is bisected on a north/south axis by Whapload Road. Once part of a larger area known as the beach village or 'The Grit' it was home to the busy herring industry. Devastation caused by heavy bombing during WWII, the decline of the fishing industry and the 1953 flood resulted in widespread demolition in the 1960s. It has two distinct parts, to the east of Whapload Road is an open area, historically used for net drying and rope making. To the west of the road, located at the base of the cliff and Arnold's Walk, is an area of dense structures, used throughout Lowestoft's history for industrial and maritime activities.

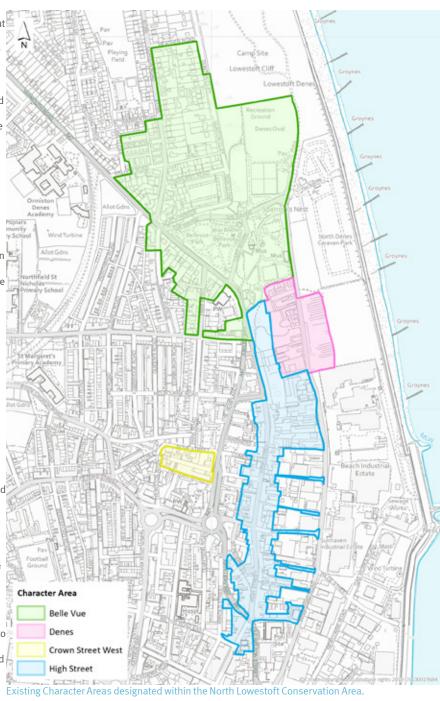
#### **Crown Street West**

A small 'island site', detached from the main body of the Conservation Area, located to the west of 'Jubilee Way', the area is effectively one road (Crown Street West) together with the structures fronting it to the north and south. Despite its small size, the area contains a diverse range of both private and secular structures, including a late fifteenth century tithe barn, a Regency former theatre and a large late nineteenth century brewery complex (now a factory). This historical diverse mix of commercial and residential activity in close proximity has led to a varied streetscape in both form and function.

#### **High Street Character Area**

This area contains the town's medieval origins and reflects the historical and economic development of the town. The High Street gently curves to follow the edge of the cliff and contains some of the town's earliest buildings, together with later Georgian and Victorian townhouses and shops. The narrow width of the street and its undulating character combine with continuous building frontages of varied form, height, and materials to create an intimate enclosed streetscape that draws in views and maintains visual interest. Historic routes called "Scores" lead away to the east, providing access down the cliff and views towards the Sea.

#### NORTH LOWESTOFT CONSERVATION AREA MAPS





Agenda Item 6 ES/0366

# **Consultation Statement**

North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document

April 2020



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#### Introduction

East Suffolk Council commissioned consultants Place Services to prepare the North Lowestoft Heritage Action Zone (HAZ) Design Guide Supplementary Planning Document (SPD). This will provide guidance for property owners and developers who are looking to make changes and alterations to buildings in the HAZ area. It will also provide guidance about shop frontages and the public realm. The area covered by the Design Guide SPD has been extended southwards to include further areas of the PowerPark. The SPD therefore covers a wider area than the HAZ.

This Consultation Statement was produced under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) to accompany the consultation on the Draft SPD which was held between 13<sup>th</sup> December 2019 and 24<sup>th</sup> January 2020 and has subsequently been updated to reflect the consultation responses received during that consultation.

The Council's approach to engagement in the preparation of a Supplementary Planning Document is set out in the Statement of Community Involvement<sup>1</sup>. While preparing the HAZ Design Guidance SPD East Suffolk Council has consulted with relevant organisations and members of the public. Details of this consultation process are set out below.

#### Who was consulted?

The following organisations and groups were consulted during the preparation of the Supplementary Planning Document:

- Suffolk County Council (as Highways Authority)
- Historic England
- East Suffolk Buildings Preservation Trust
- Lowestoft Town Council
- East Suffolk Council Local Plan Working Group
- East Suffolk Council Economic Development Team
- East Suffolk Council Design and Conservation Team
- Members of the public

<sup>&</sup>lt;sup>1</sup> How to get Involved in Local Planning – Statement of Community Involvement (September 2014)

# How were they contacted?

There were three stages to the consultation process, which are set out below.

#### 1. Stakeholder Meeting

The stakeholder meeting took place on the 17<sup>th</sup> of October and took the form of a workshop. The stakeholders listed below were invited, and this was undertaken via email invitation:

- Suffolk County Council (as Highways Authority)
- Historic England
- East Suffolk Buildings Preservation Trust
- Lowestoft Town Council
- East Suffolk Council Local Plan Working Group
- East Suffolk Council Economic Development Team
- East Suffolk Council Design and Conservation Team

The workshop involved a presentation given by the consultant, which described the Design Guide's contents in detail. Attendees were given the opportunity to ask questions and discuss the document's contents during the course of the presentation. Attendees were asked to send their views and comments to the consultant after the event. Accordingly, attendees were sent a copy of the draft document following the event to further inform any comments that they wished to make at that stage. The main issues raised by these responses are shown in Appendix 1 below.

#### 2. Public Engagement Event

A public engagement event took place on Monday the 28<sup>th</sup> of October between 2 pm and 6.30 pm at Christ Church in Lowestoft. In total 13 people attended the Public Engagement Event. Members of the public were invited to ask questions and make comments about the draft document and its contents. Comments were received on written forms that were filled in during the event and these can be viewed in Appendix 2. The event was advertised on the HAZ website and Facebook Page as well as on Twitter. Posters were placed throughout the HAZ area along the High Street and Whapload Road. The Council also contacted the Most Easterly Community Group, which is a local community organisation. The posters can be viewed in Appendix 3.

#### 3. Public Consultation

Following the production of the draft SPD, a six week public consultation took place between 13 December 2019 and 24 January 2020. The consultation was advertised using posters, a press release was issued to the media and posted on the Council's website and notices on social media. The poster and an example of a Twitter post can be found in Appendix 2. Those on the Council's planning policy consultation database were contacted directly by letter or email and the list of consultation bodies can be found in Appendix 2.

The consultation documents were made available on the East Suffolk Council website via the pages below:

https://www.eastsuffolk.gov.uk/business/regeneration-projects/haz/

https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/waveney-local-plan/supplementary-planning-documents/

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

- East Suffolk House, Station Road, Melton, Woodbridge. IP12 1RT.
- Riverside, 4 Canning Road, Lowestoft. NR33 0EQ
- Woodbridge Customer Services Centre, New Street, Woodbridge. IP12 1DT.
- Marina Customer Services Centre, Marina, Lowestoft. NR32 1HH.
- Lowestoft Library, Clapham Road South, Lowestoft. NR32 1DT.

In total 27 individuals and organisations responded to the consultation. Between them they made 123 comments.

Full copies of the responses have been published on the Council's website at

https://eastsuffolk.inconsult.uk/consult.ti/NLOWAZ/consultationHome

# Appendix 1 – Initial Consultation

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

# Responses from the stakeholder meeting

Page numbers referred to below are those in the final consultation version of the HAZ Design Guide SPD.

Department / Company	Comment	Response
Urban Vision C/O LTC	<ul> <li>The document includes some good examples of new development but is too long.</li> <li>There should be more mention of the Lowestoft Neighbourhood Plan.</li> <li>There should be greater emphasis on the economic importance of design and the historic environment.</li> </ul>	<ul> <li>The document contains a considerable amount of guidance, maps and illustrations, which explains its length.</li> <li>Text has been added to page 10 of the document that refers to the emerging neighbourhood plan.</li> <li>The restoration of the historic environment will help to support the economic regeneration of the area. Further consideration will be given to this when finalising the document and when responding to comments on the final document.</li> </ul>
ESC	Section 7	Section 7
Regeneratio n	<ul> <li>The Smokehouse concept, while a good idea, is not appropriate for the Power Park area.</li> <li>Whapload Road South will be used by HGVs to access the Birds Eye Factory and PowerPark.         Therefore, the width of the road should be retained. Wilde Street is the only point of access to the Birds Eye factory for HGVs. Raised sections of road at crossings would need to be removed.     </li> <li>Suggests road access in the PowerPark needs more detailed work.</li> </ul>	<ul> <li>The Smokehouse concept has not been taken forward through the SPD.</li> <li>Comments about HGV access are noted and consideration will be given to this in finalising the document alongside any comments received through consultation on the draft design guide.</li> <li>Detailed work about access to the PowerPark may be necessary as part of further detailed design work for the PowerPark area.</li> </ul>
ESC Great Places	<ul> <li>Drawings and examples of development were inspirational.</li> </ul>	This representation did not request any changes to the document.

Department	Comment	Response
/ Company Project and Cultural Capacity Coordinator	<ul> <li>Design Guide responds well to the identity of the HAZ area.</li> </ul>	
ESC Regeneratio n	<ul> <li>Overall support for the document.</li> <li>Battery Green Car Park Proposal would be included in the town centre master plan document.</li> <li>Need to be conscious of commercial traffic flows, particularly with regard to the PowerPark.</li> <li>Positive proposals for the High Street.</li> <li>One-way system on the High Street could potentially work well but there needs to be consideration of the junction with Rant Score.</li> </ul>	<ul> <li>The Battery Green Car Park proposal has been removed from the Design Guide SPD.</li> <li>Measures relating to commercial traffic flows for the High Street and Rants Score would be considered as part of the detailed design stage.</li> <li>The impact of the third crossing on traffic flows is potentially a</li> </ul>
	<ul> <li>The third crossing could alter traffic flow considerably and this could enable realignment of the trunk road.</li> </ul>	separate piece of work that is outside the scope of the Design Guide.
ESC HAZ Programme Manager	Reference to the neighbourhood plan should be made once but ultimately the Neighbourhood Plan should be informed by this document.	Reference to the Neighbourhood Plan relates, for information, to its emerging status.
	<ul> <li>Page 6: should refer to East Suffolk Council not East Suffolk District Council.</li> <li>Page 6: Lowestoft Rising is a key stakeholder, not a partner.</li> </ul> Section 6	<ul> <li>Section 2</li> <li>The word 'District' has been removed from references to East Suffolk.</li> <li>Reference to Lowestoft Rising as a project partner has been removed from the text.</li> </ul> Section 6

Department / Company	Comment	Response
	<ul> <li>Page 26: Change the number of scores from nine to 11.</li> </ul>	The text has been amended to refer to 11 scores, not nine.
	Section 7	Section 7
	<ul> <li>The boundary on page 41 should be shown in its original position.</li> </ul>	The text on page 6 will be amended to state that the area covered by the HAZ Design Guide has been extended southwards to include the PowerPark. The boundary for the HAZ itself has remained unchanged. The map on page 5 has been amended to illustrate this.
	<ul> <li>The East of England Park should be renamed The Ness.</li> </ul>	<ul> <li>East of England Park is now referred to as The Ness.</li> </ul>
	<ul> <li>Support for the smokehouse centre concept but this should be pursued separately.</li> <li>Sparrow's Nest and The Nest should be taken off the list of non-designated heritage assets and placed on</li> </ul>	<ul> <li>Section about the Smokehouse concept has not been taken forward through the Design Guide.</li> <li>A new important spaces section has been added to the text.</li> </ul>
	<ul> <li>a separate list of important spaces.</li> <li>Photos should include examples of different types of roofing.</li> <li>Support for one-way system on High Street, but this should include consideration of Rant Score.</li> </ul>	<ul> <li>Photos of different types of roofing have been added to the Scores section of the document.</li> <li>Rant Score will be considered as part of evolving detailed design work.</li> </ul>
	<ul> <li>Page 48 (Reconnecting Crown Street): Remove text regarding development of the site. Retain crossing concept.</li> </ul>	<ul> <li>Reference to the text on page 48 will be removed but the diagrams will be retained.</li> </ul>
	<ul> <li>Remove the A47 gateway to the site but there is potential to include something here because it is a key entry to the site.</li> </ul>	<ul> <li>The text has been amended to remove the A47 gateway to the site.</li> </ul>

Department / Company	Comment	Response
	<ul> <li>Regarding the High Street there should be an emphasis on quality of design as opposed to traditional versus contemporary.</li> </ul>	Further consideration will be given to e examples of contemporary design in finalising the document.
	<ul> <li>Section 9</li> <li>The section about internal alterations should be reduced.</li> </ul>	<ul> <li>The section about internal alterations has not been taken forward in the design guide document, which allows for a greater emphasis on external alterations.</li> </ul>
Suffolk CC Highways	<ul> <li>There is a need to state that changes to the highway will be made in partnership with Suffolk County Council Highway Authority. There is a need to avoid overlap with the town centre masterplan with an addendum to section 8.</li> </ul>	The text has been amended to state that changes will be made in partnership with SCC.
	<ul> <li>Section 7</li> <li>Page 45 (Existing Movement Network): Need to explain coloured lines.</li> <li>Reference should also be made to the existing cycle network in the area and the historically high levels of cycling.</li> <li>Page 46 (Future Movement Network): Refer to the opportunity to enhance pedestrian access along the High street, so that there is not the perception that it is finalised.</li> <li>Consider provision of charging points, space for car clubs and mobility for old people.</li> </ul>	<ul> <li>A key has been added to the map on page 45 to explain what the lines represent.</li> <li>Reference has been made to the cycle network in the town and to the historically high levels of cycling.</li> <li>Text on page 46 regarding pedestrian routes along the High Street has been reworded to state that there is an opportunity to review traffic management arrangements. This makes clear that any change to traffic management is purely conceptual.</li> <li>The provision of electrical charging points, car club spaces and increased mobility will be considered on a site by site basis. Policy</li> </ul>

Department	Comment	Response
/ Company	<ul> <li>Consider the introduction of filtered permeability at some junctions.</li> <li>Page 47 (Crown Street): Reference to the provision of a tiger crossing should be removed. However, a suitable crossing should be considered to reconnect Crown Street.</li> </ul>	<ul> <li>WLP8.21 of the Local Plan sets the policy context for sustainable transport measures.</li> <li>The issue of filtered permeability will be considered in more detail with Suffolk CC Highways at the development stage.</li> <li>The text on page 47 has been amended to incorporate the SCC comments.</li> </ul>
	<ul> <li>Page 49: It was suggested that text relating to provision of developable land and rationalising the A47/Whapload Road roundabout should be removed.</li> <li>Pages 52 and 53: The SPD should not refer to changing routes to one way. This could be amended to 'review traffic management arrangements.'</li> <li>Page 63 Blue Anchor Square: The document should not include an assumed commitment to changes in traffic movement.</li> <li>A feature such as a raised table at a junction could reduce speeds and ease pedestrian movement. Additional tree planting on wider sections of pavement could supplement the presence of two larger existing trees in the Rant Score area.</li> </ul>	<ul> <li>Text on page 49 has been removed as requested in the comment.</li> <li>The first bullet point on pages 52 and 53 has been amended to read 'review traffic management arrangements'.</li> <li>The text on page 63 has been amended so that changes to traffic movement are referred to as a design element, rather than a firm commitment to change.</li> <li>The text has been reworded but highways elements will be considered at the detailed design stage.</li> </ul>
SCC Highways - Footways, Street	<ul> <li>Use of granite on footways can cause difficulties for disabled pedestrians.</li> </ul>	<ul> <li>Section 8</li> <li>Footway granite setts are proposed to be flush, not tumbled. The mortar used will allow for a continuous flush surface.</li> </ul>

Department / Company	Comment	Response
Furniture, Drainage	<ul> <li>Would prefer if granite setts were not used for pedestrian routes. The use of a commuted sum at the planning application stage may help to finance the use of granite setts. However, it may be necessary for SCC Highways to undertake some repairs using asphalt.</li> </ul>	SCC Highways will be consulted regarding the commuted sum, as well as storage space for granite setts.
Historic England	Supports first draft.	Support noted.
Historic	Section 1: Introduction	Section 1: Introduction
England	Sections 1 and 2 can be combined.	<ul> <li>The amalgamation of sections 1 and 2 will be picked up as part of the consideration of responses to the formal consultation.</li> </ul>
	<ul> <li>General information about HAZs may not be necessary in this document. There should just be an introduction to the North Lowestoft HAZ.</li> </ul>	<ul> <li>Text changes to provide an introduction to the North Lowestoft Heritage Action Zone will be made as part of the consideration of comments received during the formal</li> </ul>
	<ul> <li>The duration of the HAZ should be placed at the end of the section.</li> </ul>	consultation.
Heritage Action Zo in south Lowestof  Paragraph 3 does last paragraph in S	<ul> <li>The document must refer to North Lowestoft Heritage Action Zone, to differentiate from the one in south Lowestoft.</li> </ul>	
	<ul> <li>Paragraph 3 does not make sense. Substitute for the last paragraph in S1, with a minor additional mention of shopfronts.</li> </ul>	<ul> <li>Paragraph 3 has been amended to address these concerns.</li> <li>This paragraph provides an overview of the document and therefore doesn't reference all elements, however</li> </ul>

Department / Company	Comment	Response
, ,	The introduction should be unequivocal in the way it is worded. 'The design guide will' Rather than 'The design guide is intended to'	<ul> <li>consideration will be given to further references to shopfronts in the final document.</li> <li>The introductory text will be amended to make it more unequivocal as part of the consideration of comments received during the formal consultation.</li> </ul>
	<ul> <li>The map on page 5 needs to differentiate between the HAZ boundary and the total area covered by the Design Guide SPD.</li> </ul>	<ul> <li>The map has been amended to illustrate the difference between the HAZ boundary and the design guide area. The text on the final paragraph of page 6 has been amended to make clear that the HAZ Design Guide covers a wider area than the HAZ itself.</li> <li>Section 3:</li> </ul>
	Section 3:	Reference to English Heritage will be deleted and replaced
	<ul> <li>Heritage Works has been updated and republished at the following location:         https://historicengland.org.uk/images-books/publications/heritage-works/.     </li> <li>The Design Guide SPD should not refer to English</li> </ul>	with Historic England.
	Heritage.	
	<ul> <li>There are potential quotes from Heritage Counts, which can be found at the following location: https://historicengland.org.uk/research/heritage-counts/2018-heritage-in-commercial-use/heritage-in-commercial-use/ and https://historicengland.org.uk/research/heritage-counts/heritage-and-economy/</li> </ul>	<ul> <li>Reference has been made to the 2018 Heritage Counts, together with a link to the factsheet about heritage and the economy.</li> </ul>

Department / Company	Comment	Response
/ company	<ul> <li>Section 4:</li> <li>Historic England's documents aren't technically guidance according to the government. The NPPG is guidance, whereas Historic England's are 'advice'. We also differentiate between 'Good Practice Advice notes' (GPAs) and 'Advice Notes' (HEANS). This page sets out Historic England's thinking on that: https://historicengland.org.uk/advice/planning/plan ning-system/</li> </ul>	Section 4:  • Text will be amended to reference Historic England 'advice'.
	<ul> <li>Include reference to:</li> <li>Advice Note 1: CAs         Advice Note 2: Making Changes to Heritage Assets         Advice Note 12: Statements of Heritage Significance         Good Practice Advice Note 3: The Setting of Heritage         Assets         CPPG (2008)     </li> </ul>	The text will be amended to reference all listed documents.
	<ul> <li>Conservation Principles 2008 can be included, as it still represents Historic England's guiding high level principles and approach to understanding, and decision taking, irrespective of whether the words used are the same as the NPPF's.</li> </ul>	Comments about Conservation Principles have been noted.
	<ul> <li>The Conservation Area Appraisal is in the process of being updated, and will be adopted in 2020. ESC will be able to advise on whether they want the new</li> </ul>	Work on the north Lowestoft Conservation Area Appraisal is not scheduled for completion until later in 2020, after the HAZ Design Guide has been adopted. However the Design Guide will be checked against working drafts of the

Department	Comment	Response
/ Company	version referenced.  Section 5:  Really like the timeline approach but maps need to	Conservation Area Appraisal as part of the consideration of comments on the formal consultation.  Section 5:  Consideration will be given to whether maps can be better presented / made bigger for the final document.
	Dueries whether there is there scope for including a section somewhere that deals with this local geology and its influence on the prevalence or otherwise of local building materials?  Section 6:  North Lowestoft Heritage Action Zone is not a heritage asset and cannot itself have heritage significance. This section needs re wording so it focuses on the place rather than the HAZ project.  Support for the approach taken for the boundary between High Street and Whapload Road character areas.	<ul> <li>Reference to geology will be added for the final Design Guide SPD.</li> <li>Section 6:         <ul> <li>The text explains the heritage assets, however it will be revisited when the Design Guide is finalised.</li> </ul> </li> </ul>
	Section 6.2	Section 6.2:  • The text has been amended to refer to the North Lowestoft Conservation Area as a heritage asset.

Department / Company	Comment	Response
, company	<ul> <li>The North Lowestoft Conservation Area is also a designated heritage asset and should be included.</li> <li>Buildings and Structures of Local Interest have been examined during the recent Conservation Area Appraisal process and this information should be available.</li> <li>It is considered that some of the buildings and spaces (fishing industry structures, Sparrows Nest) are not yet technically non-designated heritage assets. The Neighbourhood Plan may change this.</li> </ul>	<ul> <li>Information about buildings and structures of local interest in the Conservation Area has been provided to inform the document.</li> <li>Information about potential non-designated heritage assets cannot be included until the Neighbourhood Plan has been finalised. Where non-designated heritage assets are identified by the Neighbourhood Plan these will be taken into consideration in the planning application process. Due to timescales the Design Guide will be adopted before the Neighbourhood Plan.</li> </ul>
	<ul> <li>Note: 329 Whapload Road ('the Fish House') is currently being considered for listing, as is Christ Church. Decision timescales to be clarified.</li> <li>This sub-section could be better located within the document. It is suggested that if it were moved forward to the beginning of the section, the Character Area maps and then the guidance for new development would follow on more directly from each other?</li> </ul>	<ul> <li>The Council will review the information it holds about listings.</li> <li>Consideration will be given to moving section 6 for the final Design Guide</li> </ul> Section 7:

Department / Company	Comment	Response
,,	Historic Core - Picture 14 and caption: The Design Guide shouldn't be too prescriptive regarding style. Today's High Street is as interesting as it is because it reflects an evolution of stylistic and architectural tastes, and Historic England support the principle of innovative modern architecture where it enhances the character and appearance of conservation areas.	Picture 14 and its accompanying caption will be amended to emphasise the importance of high quality rather than traditional architecture.
	<ul> <li>General: Include the recent Goldsmith Street development as an example. This is for two reasons:         <ul> <li>a) it is a relatively local example, very recent, award winning, and a bit different, and b) it has also referenced in the Town Hall Feasibility Study report as a representative example for the Mariner's Street car park.</li> </ul> </li> </ul>	Pictures from the Goldsmith's development in Norwich have been added as examples to section 7.
	<ul> <li>Agree with the East Suffolk Council point made at the workshop about the concept for the Smokehouse concept. It is supported as a concept, but it might not be appropriate to include it at this stage.</li> </ul>	The section about the Smokehouse Centre has not been taken forward in the SPD.  Section 7.5:
	<ul> <li>Section 7.5</li> <li>The two maps of existing and future movement patterns are identical.</li> </ul>	The maps show subtle differences in the between present and future movement patterns.
	Section 8:  • Please reference Historic England's 'Streets for All' guidance here.	Section 8:  • Reference will be made to Historic England's 'Streets for All' guidance.

Department	Comment	Response
/ Company		
	<ul> <li>https://historicengland.org.uk/images-books/publications/streets-for-all/</li> <li>On the whole, very supportive of the general proposals in this section. Particularly like Blue Anchor Square. Interested in the idea for the Gateway to the Scores – but some more detail here and clarification about access/Christ Church too.</li> <li>Higher levels – the fisherman is shown on the elevation behind the marketplace, but that isn't on the map of possible elevations on the next page? Generally very supportive of the principle of high quality and locally derived public art to lift otherwise blank elevations.</li> </ul>	<ul> <li>Site proposals about places such as Christ Church can be worked up in more detail when proposals come forward.</li> <li>The image of the fisherman will be added to the map of possible elevations in the final document.</li> </ul>
	<ul> <li>Section 9:</li> <li>The principal purpose of the SPD is to guide new development and changes to external features/public spaces. It may therefore be possible to dispense with the advice for interior alterations. Much of this, if it related to listed buildings, would be dealt with through that consent process and there is already existing advice on the appropriate approach to this sort of thing elsewhere.</li> <li>Energy Efficiency: Note that Part L of Building Regulations does not apply to listed buildings.</li> </ul>	<ul> <li>Section 9:         <ul> <li>Guidance about interior alterations has been removed from the document.</li> </ul> </li> <li>It is noted that part L of the Building Regulations does not apply to listed buildings.</li> </ul>

Department / Company	Comment	Response
Lowestoft TC	<ul> <li>General</li> <li>There should be full recognition of Lowestoft Neighbourhood Plan, particularly in the</li> </ul>	<ul> <li>General</li> <li>The Design Guide makes reference to the Lowestoft Neighbourhood Plan and its status.</li> </ul>
	<ul> <li>The Design Guide and the Neighbourhood Plan should have a high level of compatibility. Some Design Guide content should be incorporated into the Neighbourhood Plan.</li> </ul>	<ul> <li>The Design Guide does take into account and reference emerging Lowestoft Neighbourhood Plan policies as much as possible given that production of the Plan is still in its formative stages.</li> </ul>
	<ul> <li>The document should be shortened and made more user friendly.</li> </ul>	<ul> <li>The Design Guide has been produced to be as concise as possible. However, the area and amount of detail covered means that it will be a large document if it is to be presented in an easily accessible format.</li> </ul>
	<ul> <li>The illustrations used generally provide good examples, except for pictures 13 and 14 on page 34. It is not clear how they could relate to the High Street.</li> </ul>	<ul> <li>Section 7</li> <li>The specific pictures referred to have been removed. These pictures were included to provide examples of infill development that is in keeping with surrounding buildings and architecture.</li> </ul>
	<ul> <li>Reference to Historic England publication Conservation Principles 2008 should be removed.</li> </ul>	<ul> <li>Will consult with Historic England regarding the removal of reference to Conservation Principles.</li> </ul>
	<ul> <li>There is support for the Smokehouse concept, although it is outside the scope of</li> </ul>	<ul> <li>The Smokehouse concept has not been taken forward through the Design Guide.</li> </ul>

Department	Comment	Response
/ Company		
	the Design Guide. This project could be	
	pursued through the Neighbourhood Plan.	

### Public drop in responses

Name	Comment	Response
John Ellerby	<ul> <li>Disappointed by the document – hoped for something more radical.</li> <li>Seeks to combine gentrification with encouraging economic activity.</li> <li>Glad the document has been published.</li> </ul>	The guide is appropriately aspirational whilst being realistic about what can be achieved.
Monica Brewster	<ul> <li>A sign is needed for Arnold's Bequest.</li> <li>Signage should be readable for older people.</li> <li>New uses needed for Town Hall, hotels and pubs.</li> <li>Money needed to restore shopfronts and fascias.</li> </ul>	<ul> <li>Comments about signage and history will be considered in more locally focused schemes rather than the Design Guide.</li> <li>Signage will be identified within more detailed schemes with consideration given to how it can be appropriate to all ages.</li> <li>It is not considered appropriate to include this detail within the Design Guide.</li> </ul>
Agnes Lillis	<ul> <li>Supports new development and improvements to the area.</li> <li>There should be an outside eating and coffee area next to Pork's Pit.</li> <li>There is a need for more cafes, an arts hub in the Town Hall and more independent shops.</li> <li>A sculpture in Ness Park will encourage visitors.</li> <li>The market in under the sails and in the Triangle needs more stores.</li> </ul>	<ul> <li>Comments noted.</li> <li>It is not considered appropriate to reference such specific potential projects as an outside seating and coffee area in the Design Guide.</li> </ul>

#### Public drop in poster

## DESIGN GUIDANCE FOR THE HISTORIC CENTRE OF NORTH LOWESTOFT

East Suffolk Council and Place Services are preparing design guidance for the historic centre of North Lowestoft.

This will guide the restoration of historic buildings and spaces and support the wider regeneration of North Lowestoft.

You are invited to find out more about the project, and give your views:

# Monday 28 October 2pm – 6:30pm

Christ Church Whapload Road Lowestoft NR32 1XD



planningpolicy@eastsuffolk.gov.uk ⊠ 01502 523065 🕾









### Appendix 2 – Formal consultation

### Formal consultation response summary

Name	Comment ID <sup>2</sup>	Type of response	Comment Summary <sup>3</sup>	Actions <sup>4</sup>
Paul Belton	1	Support	Page 14: 'Bomb craters' on the Denes are the remains of the Lowestoft Links Golf Course. Denes recreational development should include the swimming pool that stood close to the sea wall. It was a saltwater pool that was emptied and refilled once a week. Page 23: Photo is a gas holder not a gasometer. Page 21: Photo 2 is of a bottle store for the Eagle Brewery that stood on the site. It is not a smokehouse. The first floor is very strongly constructed, with steel banding supporting thick floorboards. There is no mention of the 'hanging gardens' enjoyed by fishermen returning from sea along the 'Yarmouth Roads.'	Text on page 15 has been amended to refer to the importance of tourism in the twentieth century and the creation of new facilities to serve visitors to Lowestoft. Reference to 'Bomb craters' has been changed to the Lowestoft Links Golf Course. This included the saltwater swimming pool close to the Denes Caravan Park, which has now been filled in. Reference has also been made to the Lowestoft Hanging Gardens.  The reference on page 22 has been amended to refer to a bottle store.  The reference on page 24 has been amended to refer to a gas holder.

<sup>&</sup>lt;sup>2</sup> Please note that there are gaps in the numbering due to the processing of comments

<sup>&</sup>lt;sup>3</sup> Please note that the references to page numbers relate to the draft SPD

<sup>&</sup>lt;sup>4</sup> Please note that the references to page numbers relate to the amended SPD

Oulton Ben	2	Support	This comment refers to the recent Glover Report (An Investigation of National Parks and Other AONBs), which expands the interpretation of public benefit in NPPF paragraphs 172 and 196 to include local heritage assets. Therefore, development that impacts upon a local heritage asset should not be permitted unless it leads to public benefit.	The overall aim of public benefit is to improve the quality of the area. The impact upon heritage assets is weighed against other factors when deciding planning applications, in accordance with planning policies and the National Planning Policy Framework.
Francesca Shapland (Natural England)	3	Support	NE Supports the conclusions of both the SEA and HRA Screening reports and has no further comments to make on either document. NE has no comments to make about the SPD.	Comments noted.
David Butcher (Affiliated to Lowestoft Heritage Workshop Centre)	4	Support	Overall Masterplan. This has the potential to create something of significance for the town.	Comments noted.
David Butcher (Affiliated to Lowestoft Heritage Workshop Centre)	5	Support	5.0 Historic evolution. Baseline History. There are some minor historical inaccuracies. Care is needed when presenting facts about Lowestoft's history.	Historical information has been amended where new information has been provided.

	1	T	T	
David	6	Support	Chapter 1. The High Street (extending as	History timeline has included new information
Butcher			far as St. Margaret's Plain) is a planned	regarding the High Street.
(Affiliated to			settlement dating from the second half of	
Lowestoft			the 14th Century. The community moved	
Heritage			here from an inland site for a variety of	
Workshop			reasons. The layout of the High Street and	
Centre)			cross lanes is still evident today.	
David	7	Support	Character Area 2 is an important part of	329 Whapload Road has been added to the
Butcher			Lowestoft's maritime past - especially	designated assets list in section 6 and reference
(Affiliated to			before the harbour was built. What	made within this section.
Lowestoft			remains of it must be preserved,	
Heritage			particularly the fishery office at number	
Workshop			329 Whapload Road. This is a building of	
Centre)			national importance and some means of	
			preserving it must be found.	
David	8	Support	Character Area 4. It is imperative to Link	Guidance seeks to increase permeability though
Butcher			Belle Vue Park, Sparrow's Nest Gardens	the HAZ area and this includes making the
(Affiliated to			and Arnold's Walk. The last named will	parkland areas more accessible.
Lowestoft			integrate this 'green area' with the built	
Heritage			environment of the High Street.	
Workshop				
Centre)				
David	9	Support	Character area 5: The Scores are of	The provision of information boards around the
Butcher			considerable visual and historic	HAZ area has been included in the introduction.
(Affiliated to			significance. Restoration of the footways	
Lowestoft			and walls, together with information	
Heritage			about their origins and use, will benefit	
Workshop			residents and visitors alike. Scores Project	
Centre)			is a valuable exercise in promoting them.	

David Butcher (Affiliated to Lowestoft Heritage Workshop Centre)	10	Support	7.0 Guidance for new Developments. Sympathetic detail on street elevations is vital. It would be useful to give a sense of what lies behind High Street facades. There is a lot of 16th century timber framing that is not visible.	Comments noted. The HAZ Design Guide however focuses on publicly visible areas.
David Butcher (Affiliated to Lowestoft Heritage Workshop Centre)	11	Support	7.6 Reconnecting Crown Street. Jubilee Way cut the old town in half, compromising its architectural and topographical integrity. Linking the High Street with St. Margaret's Plain will restore the town's original structure.	Comments noted.
David Butcher (Affiliated to Lowestoft Heritage Workshop Centre)	12	Support	8.2 Historic Core. High Street. Supports detailing relating to urban landscaping, not just that relating to 8.2.	Comments noted.
David Butcher (Affiliated to Lowestoft Heritage Workshop Centre)	13	Support	8.6 Key public spaces. Utilising Higher Levels. Some good thinking is in evidence here. The Blue Anchor public house has very interesting origins, dating from the 17th century.	Comments noted.

David Butcher (Affiliated to Lowestoft Heritage Workshop Centre)	14	Support	8.3 Whapload Road - North. Likes what is proposed for Whapload Road North and wishes to flag up the importance of the fish office at no. 329 Whapload Road. Draws attention to report being prepared by Historic England.	329 Whapload Road has been added to the designated assets list and the Statement of Heritage Significance in section 6.0.
David Butcher (Affiliated to Lowestoft Heritage Workshop Centre)	15	Support	10.1 Advertisement Material. The section about shopfronts and advertising is an important part of the HAZ. Work by Historic England (Kate Carmichael) makes for an informative read.	The work undertaken by Historic England has been noted.
David Butcher (Affiliated to Lowestoft Heritage Workshop Centre)	16	Support	1.0 Introduction. Draws attention to the need for good, well designed, accurate and well-located information boards in the High Street and elsewhere. Lowestoft's medieval location, in terms of its surface geology and topography, has so much to tell us that it is important that its relevance is conveyed to the modern observer.	This issue has been explained within the introduction.

David	17	Support	Character Area 4. Work on the North	Character Area 4 amended to include the Liver
Butcher			Denes in the vicinity of the net drying	Trench and Rope walk.
(Affiliated to			spars must draw attention to the presence	·
Lowestoft			of the remains of the rope walk and liver	
Heritage			trench. The latter was used to boil down	
Workshop			cod livers saved from Iceland voyages over	
Centre)			fire pits. This was done to make train oil	
			for fuelling domestic lamps and treating	
			leather. It can be seen on a north south	
			alignment and is 3 paces wide and 90	
			paces long. It must have proper	
			archaeological investigation to reveal its	
			potential for revealing artefacts.	
David	18	Support	6.1 Character Areas Map. Draws attention	This comment refers to useful historical
Butcher			to the publication 'The Town of Lowestoft	information but is beyond the scope of the HAZ
(Affiliated to			c. 1720-25: People and Property in a Pre-	Design Guide.
Lowestoft			Industrial Coastal Community.' This	
Heritage			includes the whole of the urban area at	
Workshop			the time and includes every property that	
Centre)			was part of the built environment,	
			together with details of transfer. All	
			property owners are listed, together with	
			their occupations where known. This	
			might be useful in applying work	
			completed in HAZ Design Guide.	

Sally Norfolk	20	Support	Very pleased that the area might be improved. Support for the crossing at Crown Street and the mural on the end wall where Chambers Cycle Shop was located. There is no mention of the grade II tithe barn, which was known as Crown street Motors on Crown Street West. This is an important building, which must be preserved and highlighted.	Section 7.6 has been amended to refer to the Crown Street Motors building.
Norman Castleton	44	Observation	1.0 It is hoped that this plan will not be overridden in the way that the Green Space and Nature Reserve Strategy were.	Comments noted. The Design Guide will be a material consideration in determining planning applications.
Norman Castleton	45	Object	Overall masterplan. The HAZ should be extended north to include the North Denes and Denes Oval. This area is of heritage significance in that it was given to the town in two covenants for recreation and open space. This area should be developed as a country park as per the original proposals and with no further development.	The Denes Oval is included within the Historic Parkland area of the HAZ Design Guidance. The North Denes is situated mostly outside of the HAZ area, but Character Area 4 text in section 6 does make reference to the area.
Norman Castleton	46	Observation	2.0 It is hoped that some of these aspirations are delivered. The area suffers from woeful neglect, in particular the Crown Hotel. Mariners Score and Crown Score require immediate attention. Repaired flint at Wilde's Score is a good example of what can be done. The street lighting needs to be more antiquated in appearance.	The HAZ Design Guide provides guidance for new development, the alteration of existing buildings, the restoration of the public realm and the repair and alteration of shopfronts. This will help to guide the restoration and development of buildings and public spaces within the HAZ area.

Norman Castleton	47	Support	3.0 Agrees with this approach.	Comments noted.
Norman Castleton	48	Observation	4.0 The area needs to be cleaned up. The scrapyard next to the wind turbine is an eyesore. There are several partially developed buildings along Whapload Road, which also suffers from issues with speeding. There is a wonderful view along the cliff top from the lighthouse. Murals on the gasometer would enhance the area.	Comments noted. The possibility of using public art in the HAZ area and in particular the PowerPark can be explored further in later design projects.
Norman Castleton	49	Support	4.0 The Denes and Beach Village were heritage opportunities that have been spoiled. It is hoped that conservation policies will be acted upon.	Comments noted. The purpose of the Design Guide is to provide detailed guidance to inform future development.
Norman Castleton	50	Support	4.0 Fine in principle, if policies are followed.	Comments noted. The Design Guide will be a material consideration in determining planning applications.
Norman Castleton	51	Observation	4.0 North Lowestoft Character Area Appraisal. The area is rundown. It is necessary to bring activity back to the area, including Council Services to the Town Hall.	Heritage led regeneration of the area has the potential to encourage an economic revival of the HAZ area.
Norman Castleton	52	Observation	4.0 Built Heritage and Design Supplementary Planning Document. Fine if observed.	Comments noted. The HAZ Design Guide will be a material consideration in planning applications.

Norman Castleton	53	Observation	5.0 Baseline History. There is little left after years of neglect and wanton destruction	Comments noted. The HAZ Design Guide aims to change this by providing guidance about the restoration and development of the HAZ area.
Norman Castleton	54	Observation	6.0 This section could suggest the removal of the Denes caravan park, which would reveal some former heritage sites.	The future of the Denes Caravan Park is beyond the scope of this document, however further reference to it has been included under the Historic Parklands character area
Norman Castleton	55	Observation	6.1 Character Areas Map. Parklands should be extended north.	The Design Guide refers to the North Denes.
Norman Castleton	56	Observation	Character area 1. There are still has some heritage assets, including some Georgian buildings, but these require better care.	Comments noted. The HAZ Design Guide should inform the design of any future development related to such buildings.
Norman Castleton	57	Observation	Character area 2. This area includes unfinished development and suffers from fly tipping but the skyline here is potentially wonderful.	Completing development and fly tipping are both beyond the scope of the HAZ Design Guide.
Norman Castleton	58	Observation	Character Area 4. This area should be extended north to include the whole of the North Denes. The caravan park should be removed. Renovation work should be vandal proof.	The document refers to the North Denes. Reference to street furniture being vandal proof is contained in chapter 8.
Norman Castleton	59	Observation	Character area 5. Pictures fail to show the true condition of the area. The Scores were never properly maintained, and Mariners Score and Crown Score are in a poor condition. There are holes in walls, boarding and fly tipping.	Comments noted. However Chapter 5 covers the heritage significance and is therefore highlighting features that contribute to this.

Norman Castleton	64	Observation	Character Area 2. Whapload Road requires regeneration and several buildings require attention. The Ice Factory/Store should be refurbished or removed. Kittiwake Colony should be moved to another location. Buildings near the police station look unfurnished and spartan. Other buildings also require attention. Notes unfinished flats opposite the net drying racks.	Direct action related to the restoration of individual buildings is beyond the scope of the HAZ Design Guide. However, the HAZ Design Guide will guide any regeneration projects that come forward. The removal of the kittiwake colony is also beyond the scope of the Design Guide.
Norman Castleton	65	Observation	Character Area 3. Remove the scrap metal yard near the gasometer, which could be made attractive with murals.	Comments noted. The possibility of using public art in the HAZ area and in particular the PowerPark can be explored further in later design projects.
Norman Castleton	66	Observation	6.2 Heritage Assets. Important Local Spaces. The North Denes are covenanted to the people of the town. The caravan park should be removed.	Comments noted. The Caravan Park is referred to in section 6.2. The document notes that it visually conflicts with the historic and natural characteristics of the parklands area but that it supports the local tourist industry.
Norman Castleton	67	Observation	7.0 Historic Core. Gardens at the back are overgrown in a poor state. Much of the separating wall may also require attention.	This specific action is beyond the scope of the HAZ Design Guide.
Norman Castleton	68	Observation	7.0 Historic Core. The work of Taylor and Green provides some examples of work to follow.	Comments noted.
Norman Castleton	69	Support	7.1 Good examples of characterization.	Comments noted.
Norman Castleton	70	Support	7.3 Supports limited opportunities for development in Lowestoft.	Comment noted.

Norman	71	Support	7.4 Questions why there are no crinkle	Text has been amended to refer to crinkle crankle
Castleton			crankle walls.	walls.
Norman	72	Support	8.2 Historic Core. High Street. Support for	Comments noted.
Castleton			tree planting and areas unpolluted by traffic.	
Norman	74	Observation	6.2 The Prince Albert Pub is worthy of	The Prince Albert Pub is outside of the HAZ area
Castleton			listing but has been marred by subsequent	and so beyond the scope of the HAZ Design Guide.
			alteration and development. The core	
			shape is reminiscent of fishing related	
			buildings on Whapload Road. The building	
			was mentioned by Pevsner and should be	
Norman	75	Observation	returned to its former glory.  8.3 Whapload Road - South. Remove all	The Design Cuide itself cannot result in direct
Castleton	/3	Observation	modern unused buildings. Install speed	The Design Guide itself cannot result in direct action to remove vacant buildings however sets
Castleton			limitation measures.	out design guidance to support enhancements.
			minutation measures.	Speed control measures can only be installed by
				the County Highway Authority.
Norman	76	Observation	8.3 Whapload Road. Whapload Road	Comments noted. The Caravan Park is referred to
Castleton			North. Area ruined by the caravan site.	in section 6.2 as an important local space, which
				supports the local tourist industry.
Norman Castleton	77	Observation	8.5 Street furniture and materials installed need to be vandal proof.	This is covered in the guidance on durability.
Norman	78	Support	8.7 Introduction. Typical seaside plants	The list of plants in the design guide is purely
Castleton			already grow near the sea wall and these	indicative. The Design Guide has been amended to
			could be grown successfully.	include reference to the RHS website, where more
				information about coastal plants can be found.
Norman	79	Support	10.1 Lettering and Symbols. Agrees that	Comment noted.
Castleton			sans serif and slab serif lettering would	
			probably be out of character, except on	
			modern buildings.	

Marion Wells	60	Observation	1.0 Having read the document please see below for the following comments: 1. The document is excellent it is hoped will contribute to regeneration of Lowestoft.  2. To maximise use of buildings, uses should be extended to include business, office, studio, workshop, gym, community space, sports areas, car bays with electric charging points. 3. Guidance on flood defence would be useful due to risk of	The document has been amended to state that waste bins be located in discrete, accessible places that are serviceable from the highway. This is so that waste bins do not become an eyesore.  The Policy and PowerPark sections have been amended to draw attention to detailed guidance about flood risk and management that is being prepared for the PowerPark area.
			flooding from the North Sea. 4. Communal bins for each type of waste would be less of an eyesore than individual bins. 5. Installation of high-speed internet access is necessary to encourage start up businesses.	New uses within buildings would be guided by the policies of the Waveney Local Plan (2019).  The installation of high speed internet access is beyond the scope of the Design Guide.
Marion Wells	61	Observation	8.7 Introduction. Drought and wind tolerant plants should be planted due to the dry climate. Rain gardens are a good way of dealing with periods of heavy rainfall.	The list of plant species within the HAZ document is indicative and reference is made to the RHS website where further information can be found about plants that are suitable for a coastal environment.
Marion Wells	62	Observation	9.1 Energy Efficiency and Historic Buildings. Roof mounted solar panels should be encouraged on modern and new buildings in the PowerPark. Business car parks and public car parks should both have solar panels covering car parking spaces. These would generate electricity and provide shade.	The Design Guide already provides advice about solar panels. A link to further information on the Historic England website is provided.

Marion Wells	63	Observation	8.0 Cycle racks should be installed where possible. There should be as much street furniture as possible. Street furniture should be designed to reflect aspects of the town, such as wind turbines and fishing.	Reference to cycle racks is made wherever possible in the document to encourage sustainable forms of transport.
Sarah Foote (Lowestoft Town Council)	81	Observation	Lowestoft Town Council has no objections to the document and looks forward to it being adopted.	Comments noted.
Gill McElvogue (Health and Safety Executive Explosives Inspectorate )	80	Observation	The HSE is not a statutory consultee for Local and Neighbourhood Plans but please refer to the advice app, GIS consultation zones and recognised methodology. These can assist in ensuring that allocated sites do not conflict with major hazards, pipelines or explosive sites. Any future licenced explosive site applications will be subject to the relevant planning application processes.	Comments noted.
Anthony Rudd	144	Observation	1.0 There is concern that the regeneration proposals outlined in the document are not supported by adequate investment, except for the potential for some very limited grants that would induce funding. The introduction appears to deter investment by increasing costs and reducing choice. The Guide also discourages measures such as shopfront security. The SPD should focus more on	The purpose of the HAZ Design Guide is to provide guidance that will improve the quality of the historic environment. This will in turn encourage economic regeneration of the area.

			socio economic issues and on encouraging economic activity. Issues include a limited range of socio-economic groups, perceived high levels of crime and poor public transport.	
Anthony Rudd	145	Observation	7.6 Reconnecting Crown Street. An additional crossing at Crown Street would mean there are three crossings on a 300 metre stretch of road, which is excessive. There is an assumption that the third crossing will significantly alter traffic flow, which seems misplaced. These proposals will deter economic activity in both the HAZ area and the town centre. The document fails to address issues such as crime, antisocial behaviour and poor access via public transport. These issues have resulted in economic and general decline of the High Street.	Page 48, section 7.6 has been amended to refer to the importance of a pedestrian crossing reconnecting Crown Street in improving east - west cycle links in the town. This will be subject to further modelling and consultation with Suffolk County Council Highway Authority. Further reference to addressing crime has been included in section 8 on the public realm.
Anthony Rudd	146	Observation	7.0 Historic Core. The document does not deal with crime and antisocial behaviour and public transport. These issues have helped cause economic and general decline in the High Street.	Reference for the need for design to address issues of crime has been made. This is in accordance with the Suffolk Police representation about Designing out Crime.

Paul Fletcher (Beccles Society)	125	Observation	No comments.	Noted.
Natalie Beale (Broads Authority)	82	Support	No comments to make but is generally supportive of proposals for the HAZ area.	Comment noted.
Emma Bateman	115	Observation	1.0 In light of the declared Climate Emergency climate change adaptation should be central to any plans for the area and should play an important part in any decisions that are made. There should be more discussion of new technology, such as ground source heat pumps or solar tiles. Failure to include this technology reinforces the notion that it is detrimental to the appearance of the area or incompatible with conservation. The need to tackle climate change is overarching and so the document must be flexible to allow property owners to install low carbon energy devices.	Reference has been made in the introduction to the Council's climate emergency declaration and the importance of addressing these issues to Section 4: Policy Advice and Guidance. Section 4 also refers to relevant Local Plan policies, as well as sources of information, such as Historic England and the Design and Conservation team. Climate change references have also been added to Character Area 3, and to sections 7.1, 8.1, 8.5 and 8.7. Regarding the PowerPark area consideration has also been given as to how different aspects of design and regeneration could contribute to a climate change response. Further detailed design guidance is being prepared for the PowerPark area but this does not prevent the HAZ Design Guide from addressing design issues in the PowerPark area.
Emma Bateman	116	Observation	Overall Masterplan. The Denes and Ness Park have a natural Beauty and adding cafes and seaside amusements would spoil them.	Comments noted.

Emma	117	Support	8.2 Historic Core: High Street. Proposals	The introduction to section 8 has been amended
Bateman			for the High Street are acceptable as part	to state that the Design Guide will reflect the
			of a comprehensive plan for traffic	other strategies that sit alongside it. The Design
			management. Parking areas along the	Guide will also inform the Lowestoft Town Centre
			High Street are already busy, including	Master Plan.
			that outside the Blue Anchor, which is	
			earmarked as a seating area. There is no	
			parking strategy to deal with extra traffic if	
			this area becomes more popular. One-way	
			traffic increases speeds, which could	
			endanger pedestrians and cyclists. Public	
			transport provision is necessary to	
			encourage visitors and support local	
			businesses.	
Emma	118	Observation	7.5 There is currently no direct link	Page 46 has been amended to make reference to
Bateman			between the High Street and Arnold's	the Waveney Cycle Strategy. This document notes
			Walk. Cyclists currently take a short cut	the importance of improved linkages to residential
			along the pavement opposite the petrol	areas as well as describing current cycle and bus
			station, which is too narrow for both	routes within the HAZ area. Key improvements to
			cyclists and pedestrians. Arnold's Walk is	the North Denes Promenade and the High Street
			too steep for less able cyclists or those	will be included. Page 46 has been amended to
			with pushchairs. There needs to be a	reference potential improvements to cycle routes.
			comprehensive rethink of the way the	
			area is laid out, which places a strong	
			emphasis on cycling.	

Emma Bateman	119	Support	8.3 Supports the slowing of traffic along the northern end of Whapload Road. This will make it safer for increasing numbers of tourists.	Comments noted.
Emma Bateman	120	Support	7.6 Supports the reconnection of East and West Crown Street in principle because this was the main route in and out of the town. However, this route is architecturally unremarkable and there is another crossing nearby to the north. Improved linkages across the A47 should be considered as part of a wider cycling strategy for the town.	Page 48, section 7.6 has been amended to refer to the importance of a pedestrian crossing reconnecting Crown Street in improving east - west cycle links in the town. This would be subject to further modelling and consultation with Suffolk County Council Highway Authority.
Emma Bateman	121	Support	8.7 It is hoped that some of the plants specified will be edible. This will give people more of a connection to the food they eat. Herbs in particular are fairly resilient and could withstand the Lowestoft climate.	Specifying edible herbs is too detailed and so this has not been referenced in the HAZ Design Guide. The text has been amended to state that community organisations could be given responsibility for planting and maintaining the rainwater gardens with flexibility on planting.
Emma Bateman	122	Observation	7.0 Welcomes the provision of housing through a mixture of new development and restoration. Wishes to see the Triangle Market brought back into use with new stalls and outdoor seating. This will need to include better parking management. The proposal to add artwork to gable ends needs to be done	Comments noted. The guidance in the HAZ Design Guide will encourage the economic regeneration of the Triangle Market.

			well, with locally appropriate pictures. Otherwise these walls should be left blank. Poorly designed and executed work is jarring to the eye and detrimental to the area.	
Emma Bateman	123	Support	7.1 Likes the design proposals for Whapload Road, which include traditional warehouse style structures and modern materials.	Comments noted.
Emma Bateman	124	Support	7.2 Guidance for New Developments. Supports modern development in the PowerPark to compliment the Orbis Energy and Scottish Power buildings. All new buildings in the PowerPark should be very energy efficient. Likes modern buildings and materials if they are done well and are in tune with the future renewable energy industry.	The HAZ Design Guide has been amended to include information about renewable energy. Modern materials are considered acceptable depending on the context.
Gooch	94	Observation	Overall masterplan. Supports the creation of an open air / living museum, such as that at Ironbridge or Beamish. The whole town would benefit from increased footfall. Wishes to receive reassurance that the different parts of the HAZ will receive annual maintenance.	Annual maintenance is beyond the scope of the HAZ Design Guide. Creation of an open-air museum is also beyond the scope of this document.

Historic	137	Observation	1.0 The SPD is clearly well set out and is	Comments noted.
England			largely well illustrated with photographs	
			and pictures. It will provide a coherent set	
			of principles for all stakeholders, which	
			includes private sector developers,	
			property owners, local authority officers	
			and members of the public.	
Historic	138	Observation	2.0 Section 1: The 'North Lowestoft	Typo corrected.
England			Historic Action Zone' should read	
			'Heritage Action Zone'.	
Historic	139	Observation	5.0 Baseline History. The timeline	Font size has been increased slightly.
England			approach is considered useful but needs	
			to be enlarged.	
Historic	140	Observation	6.2 Designated Heritage Assets. Two	Both Listed buildings have been added to the list
England			additional buildings have been added to	of designated heritage assets. Clarification has
			the National Heritage List for England: 329	been provided about whether these two buildings
			Whapload Road and the Fish House to the	are included in the overall number of listed
			rear of 312-14 Whapload Road.	buildings.

Historic	141	Observation	7.5 and 8. Welcomes proposed changes to	Reference has been made to Historic England's
England			the road layout, particularly around the	document in this section. Movement diagrams
			High Street and Triangle Market where an	have been amended so that now the proposed
			improved environment for non-vehicular	diagram is different to the existing map.
			traffic would benefit the conservation	
			area. Would also welcome the increased	
			connectivity between the High Street and	
			Jubilee Way via a new crossing at Crown	
			Street. Would also welcome improved	
			pedestrian access to the new Ness Park.	
			Would welcome reference to the Historic	
			England Publication 'Streets for All: Advice	
			for Highway and Public Realm Works in	
			Historic Places' in section 8. Existing and	
			proposed movement maps in section 7.5	
			are currently the same diagram and so a	
			comparison cannot be made.	
Historic	142	Observation	7.5 and 8. Welcomes proposed changes to	Reference has been made to Historic England's
England			the road layout, particularly around the	document in this section. Movement diagrams
			High Street and Triangle Market where an	have been amended so that now the proposed
			improved environment for non-vehicular	diagram is different to the existing map.
			traffic would benefit the conservation	
			area. Would also welcome the increased	
			connectivity between the High Street and	
			Jubilee Way via a new crossing at Crown	
			Street. Would also welcome improved	
			pedestrian access to the new Ness Park.	
			Would welcome reference to the Historic	
			England Publication 'Streets for All: Advice	
			for Highway and Public Realm Works in	

			Historic Places' in section 8. Existing and proposed movement maps in section 7.5 are currently the same diagram and so a comparison cannot be made.	
Historic England	143	Observation	10.1 Welcomes the shopfront design guidance. Further illustration is needed to accompany pages 74, 75 and 77. An example is Uncle Sid's Plastic Free Emporium. Clarity is needed regarding which changes require planning permissions and whether Article 4 Directions restrict PD rights. Reference should be made to the Historic England Research Report: 'The Shopfronts of Lowestoft High Street, Suffolk: Research and Investigation.' This provides useful information about the historical development of shopfronts and the process of dating and identification. It also provides useful information about specific buildings, which could be useful for owners looking to undertake renovation.	Specific reference has been made to Historic England's research reports about Lowestoft shop fronts at the start of this section, with document link provided. Photographs have been added to illustrate the text on pages 76, 77, 78, 79 and 80.

Historic	147	Observation	SEA Screening Opinion. Historic England	Comments noted.
England			will comment upon the specific question	
			'Is it (the SPD) likely to have a significant	
			effect on the historic environment?' The	
			Screening Opinion indicated that the	
			Council considers that the SPD will not	
			have any significant impact upon the	
			historic environment because it does not	
			determine uses at the local level, and does	
			not set a framework for projects under	
			either Annex I or Annex II or the EIA	
			Directive. It will support the delivery of	
			policies as set out in the Local Plan. In the	
			context of the criteria set out in the	
			Environmental Assessment Regulations	
			Historic England concurs with this opinion	
			based on the information provided. The	
			two other statutory bodies should also be	
			consulted. Requests that a copy of the	
			determination as required by Regulation	
			11 of the Environmental Assessment of	
			Plans and Programmes Regulations 2004.	

Jaka Damas	0.5	Observation	1. O love by a divisible Auto Combine at Triangle	The IIA7 design Child has been subject to two
John Daynes	85	Observation	1.0 Involved with Arts Centre at Triangle	The HAZ design Guide has been subject to two
			Market but comments do not represent	rounds of consultation both of which were
			the views of that organisation. Supports	advertised to members of the public. This included
			the document's proposals but believes	posters, adverts on the Council's website and
			that success depends on two issues: 1.	social media. The document is written to be as
			Public involvement. The Arts Centre	clear and concise as possible but of necessity
			responded to the preliminary consultation	includes a lot of local and technical detail, which
			but received no response. The formal	means that it cannot be made any shorter. The
			stage of consultation was poorly	HAZ Design Guide is part of the HAZ project, which
			advertised, and public awareness remains	includes engagement with local businesses,
			limited. The documents also suffer from	residents, property owners and others to enable
			being overlong, too technical and	social and economic regeneration that benefits
			bureaucratic. Shorter summaries would	the local community. The Design Guide will be a
			help to retain public interest. 2. Delivery	material consideration in decisions on planning
			is key, and the project needs to be	applications.
			completed. This needs to be promoted to	
			property owners, residents, businesses	
			and others and to give them ownership of	
			the project, with support of planning	
			teams and other expertise.	
Lanpro	97	Observation	1.0 Tingdenes (North Denes) Ltd are	The Design Guide refers to the presence of the
(Tingdene			disappointed that there is no reference to	caravan park. There is also a description of how
(North			the caravan park in the document. More	tourism has evolved in the North Denes area.
Denes) Ltd)			specifically: Page 4; paragraphs 5 and 6	Some of the points raised have been considered in
, ,			states that the document will provide a	greater detail in responses to individual comments
			HAZ wide strategy that meets the needs of	and these are set out elsewhere in the table.
			all stakeholders, but the caravan park has	
			been omitted from the document. Page 7	
			paragraph 4 is again hard to reconcile with	
1			paragraph + is again hara to reconcile with	

omitted from the document. Section 4 page 8 does not refer to Waveney Local Plan objective 'Central and Coastal Lowestoft - North Denes beyond tourism and ecological enhancement strategy.' The document also does not include WLP8.15 New Self-Catering Tourist Accommodation, which sets out criteria for large new self-catering tourist sites, including those close to Lowestoft. This is a significant omission. Section 4, page 10 -Lowestoft Neighbourhood Plan has not yet been published and yet this document describes it as though it has already been adopted. Section 5-page 12 Historic Evolution makes no reference to the role of tourism in the town's history. Section 6, page 17 - Character Areas Map. The caravan site has been omitted and it is a misnomer to describe the whole area as parklands when a significant part of it is the caravan park. The caravan park should be recognised as a separate tourism use within the HAZ. Character area 4. Page 25, image 4. This is north east from The Ravine, not eastward. A photo looking eastward would include the caravan park. 6.2 Important Local Spaces. Page 29, Ness Park. Ness Park is located directly to the south of North Denes Caravan Park. The

			document acknowledges the presence of the Bird's Eye factory and so should acknowledge the presence of the caravan park. Failure to mention the caravan park is a missed opportunity because tourism	
			uses could help attract tourists to the area	
			and support regeneration.	
Lanpro (Tingdene (North Denes) Ltd)	98	Observation	3.0 Page 7, paragraph 4. The aspirations of section 3 are not compatible with the omission of the caravan park.	References have been made to the caravan park elsewhere in the Design Guide, but it is not felt appropriate to refer to it in this section which sets out the overarching aims of the Design Guide.
Lanpro (Tingdene	99	Observation	4.0 Section 4, page 8 does not refer to Waveney Local Plan objective 'Central and	Page 8, paragraph 1 has been updated to state that the HAZ Design Guide should be read in
(North			Coastal Lowestoft - North Denes beyond	conjunction with national and Local Plan policies.
Denes) Ltd)			tourism and ecological enhancement	The Local Plan contains a number of strategies to
			strategy.' The document also does not	deliver improvements to Lowestoft. Reference to
			include WLP8.15 New Self-Catering Tourist Accommodation, which sets out criteria	'North Lowestoft Conservation Area Character Appraisal' (March 2007) will be amended to refer
			for large new self-catering tourist sites,	to 'North Lowestoft Conservation Area Appraisal'.
			including those close to Lowestoft. This is	Reference to WLP8.15 has been made in the list of
			a significant omission.	relevant policies.
Lanpro	100	Observation	Section 4, page 10 - Lowestoft	The text was clear that it is an emerging
(Tingdene			Neighbourhood Plan has not yet been	Neighbourhood Plan however the text has been
(North Denes) Ltd)			published and yet this document describes it as though it has already been adopted.	amended to state that this is an emerging plan and the contents are subject to change following
Delles) Lluj			it as though it has already been adopted.	consultation.
Lanpro	101	Observation	5.0 Baseline History. Makes no reference	The caravan park has been mentioned in the
(Tingdene			to historic tourism use in the North Denes	historic timeline of Lowestoft. This describes how
(North			area and its influence on the character of	tourism in the Denes area was enhanced by the
Denes) Ltd)			the area.	caravan park.

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Lanpro (Tingdene (North Denes) Ltd)	102	Observation	6.1 Page 17 - Character Areas Map. The caravan site has been omitted and it is a misnomer to describe the whole area as parklands when a significant part of it is the caravan park. The caravan park should be recognised as a separate tourism use within the HAZ.	The caravan park has been mentioned on page 30 as part of the paragraph about Ness Park as well as in the historic timeline. The latter describes how tourism in the Denes was enhanced by the caravan park. The map on page 25 has been amended to show the position of the Caravan Park.
Lanpro (Tingdene (North Denes) Ltd)	103	Observation	Character area 4. Page 25, image 4. This is north east from The Ravine, not eastward. A photo looking eastward would include the caravan park.	The caption has been altered to state that the photo faces northeast, rather than just east.
Lanpro (Tingdene (North Denes) Ltd)	104	Observation	6.2 Important Local Spaces. Page 29, Ness Park. Ness Park is located directly to the south of North Denes Caravan Park. The document acknowledges the presence of the Bird's Eye factory and so should acknowledge the presence of the caravan park.	The caravan park has been referred to in the paragraph about the significance of Ness Park.
Most Easterly Community Group	105	Observation	1.0 Two comments relate to the whole document. 1. The document was long, and consultation took place over Christmas. The consultation was therefore not inclusive. 2. There is not mention of the climate emergency that should underpin all proposals. There was no option for Omissions or Questions.	Reference has been made in the introduction to the Council's climate emergency declaration and the importance of addressing these issues, as well as to Section 4: Policy Advice and Guidance.  Section 4 also refers to relevant Local Plan policies, as well as sources of information, such as Historic England and the Design and Conservation team. Climate change references have also been added to Character Area 3, and to sections 7.1, 8.1, 8.5 and 8.7. Regarding the PowerPark area consideration has also been given as to how different aspects of design and regeneration could

				contribute to a climate change response. Further detailed design guidance is being prepared for the PowerPark area, but this does not prevent the HAZ Design Guide from addressing design issues in the PowerPark area. The public consultation ran for a total of six weeks between 13 <sup>th</sup> December 2019 and 24 <sup>th</sup> January 2020. This provided the opportunity for members of the public to respond both before and after the Christmas break. The document was available online as well as in hard copy and comments could be made via the Council's consultation portal, via email or in writing.
Most Easterly Community Group	106	Observation	1.0 The document is difficult to read, and the consultation took place over Christmas when it was difficult for people to respond. The Design Guide appears to conflict with other plans for Lowestoft, which is confusing. Main points are that there is no mention of the climate emergency, which has been declared by the Council. Any Council document should therefore refer to this. In section 1, paragraph 3 there is a conflict between conservation and enhancement. Modern technologies can save money and help to respond to the climate emergency. Owners of listed buildings in the past have been prevented from installing energy	Reference has been made in the introduction to the Council's climate emergency declaration and the importance of addressing these issues, as well as to Section 4: Policy Advice and Guidance.  Section 4 also refers to relevant Local Plan policies about climate change and renewable energy, as well as sources of information, such as Historic England and the Design and Conservation team.  Climate change references have also been added to Character Area 3, and to sections 7.1, 8.1, 8.5 and 8.7. Regarding the PowerPark area consideration has also been given as to how different aspects of design and regeneration could contribute to a climate change response. Further detailed design guidance is being prepared for the PowerPark area, but this does not prevent the

			saving devices, in particular double glazing.	HAZ Design Guide from addressing design issues in the PowerPark area. The public consultation ran for a total of six weeks between 13 <sup>th</sup> December 2019 and 24 <sup>th</sup> January 2020. This provided the opportunity for members of the public to respond both before and after the Christmas break. The document was available online as well as in hard copy and comments could be made via the Council's consultation portal, via email or in writing.
Most Easterly Community Group	107	Objection	1.0 There should not be an emphasis on conservation at any cost. An insistence on conserving existing materials and technologies is inefficient and prevents progress.	The HAZ Design Guide seeks to encourage development that is in keeping with the principles set out in the Design Guide. It does not seek to prevent the use of new materials or technologies.
Most Easterly Community Group	108	Observation	1.0 With reference to section 1, paragraph 6 how will this be enforced? It appears that enforcement action can only be taken concerning Listed properties and there are a number of business and retail properties where no enforcement action has been taken. There are no incentives to encourage Listed building owners to undertake repairs and repairs are often unaffordable.	The Council employs officers to investigate and undertake enforcement action where necessary. Enforcement is beyond the scope of the HAZ Design Guide.

Most Easterly Community Group	109	Objection	10.1. The section about shopfronts is overly prescriptive. Appearance and paint colour are very subjective, and it is unfair that certain shops are named and shamed. It is not clear why certain tastes in design have been allowed to prevail.	Guidance about shopfronts is intended to encourage repair or alteration that is sympathetic to the existing shopfronts and their surrounding areas. Examples are provided to illustrate what changes are appropriate to the area but are not intended to be prescriptive.
Most Easterly Community Group	110	Observation	7.4 Martin's Score is not mentioned, and this should be a priority for regeneration because it is currently not safe. Regeneration of the Scores should not be undertaken at the expense of safety. Safety is not discussed in this document.	Within section 8.0 a point has been added to state that safety will be ensured throughout the HAZ area and not overlooked due to aesthetic or design quality considerations. Measures such as non-slip materials and handrails have been suggested in places such as The Scores.

Most Easterly Community Group	111	Observation	7.0 33 High Street. Proposals for business or retail use on the ground floor and dormer properties on the upper floor assume that there is a need for more retail development on the High Street. Empty retail properties suggest there is little demand. It is thought unlikely that dormer properties will be popular and could also remain empty. Empty properties are not good for an area and it is better if properties simply become wholly residential rather than left empty.	The HAZ Design Guide seeks to describe the current uses of High Street buildings. It does not seek to guide the future use of High Street buildings. Policies in the Waveney Local Plan would guide appropriate uses in the High Street.
Most Easterly Community Group	112	Support	7.5 Supports the opportunity to increase pedestrian priority be reviewing traffic management arrangements.	Comment noted.

Most	113	Observation	7.5 Pedestrianisation is not possible while	The HAZ Design Guide includes proposals that
Easterly			parking is chaotic and there is no bus	could have a positive effect on road safety. Details
Community			service. It is important for shoppers to be	would be resolved by consultation with the
Group			able to use their cars. Proposed solutions	County Highway Authority during the
			are for a cheap bus service linking to the	development management process or as part of
			town centre and for one-hour parking in	subsequent design projects.
			nearby car parks. This would then support	. 5 ,
			pedestrianisation. One-way streets are	
			dangerous without traffic calming	
			measures. Cars travel up both Rant Score	
			and the High Street the wrong way - what	
			can be done to stop this? Cars shoot	
			across the junction between the High	
			Street and Duke's Head Street - what can	
			be done to stop this? Cars cut through the	
			Triangle Street during the day, when they	
			are restricted - what can be done to stop	
			this? Parking restrictions are not enforced.	
			These issues need to be resolved now.	
Most	114	Observation	8.2 Omission: There is a bus lane shown	The amended road layout in the HAZ Design Guide
Easterly			on the High Street but no details of any	will be subject to further work and consultation
Community			bus service. This is crucial for regeneration	with Suffolk County Council Highway Authority.
Group			of the High Street. The bus service will	Bus timetables are beyond the scope of the HAZ
			only be viable if there is two-way traffic on	Design Guide. The HAZ Design Guide was subject
			the High Street. There should be a bus	to public consultation and was advertised on
			lane on Whapload Road. Why were no	posters, the Council's website and social media.
			businesses on Whapload Road consulted	
			about this document?	

National Grid (Avison Young)	86	Observation	No comments.	Noted.
Norfolk County Council	126	Observation	No comments.	Noted.
North Lowestoft United Reform Church	84	Support	1.0 Pleased to note that the church is included on the southern edge of the HAZ. The church requires some renovation work. A full survey of the building was undertaken by the Morton Partnership, which is available.	Comments noted.
Suffolk County Council (Cameron Clow)	127	Observation	1.0 Suffolk County Council supports the objectives of the guidance, particularly the aim to enhance the area with appropriate development while improving connectivity and the public realm. Suffolk County Council's main area of the interest is the public realm, particularly where it concerns the highway.	Comments noted.
Suffolk County Council (Cameron Clow)	128	Observation	4.0 WLP8.40 - Archaeology guidance is welcome. The Design Guide should recommend early engagement with Suffolk County Archaeological Service to identify the archaeological potential of an area early in the development process. Development could be designed to reflect archaeological content.	The document has been amended to refer to policy WLP8.40 and to advise of the importance of consultation with SCC archaeological service early in the development process.

Suffolk	129	Observation	7.5 Suffolk County Council supports	Specific widths have been removed from public
County			measures to reduce the dominance of	realm diagrams to reduce the potential for conflict
Council			motor vehicles but consultation with the	with the County Highway Authority. These were
(Cameron			Highway Authority is required before	conceptual rather than technical drawings that
Clow)			specific details are included in the	provided ideas about how to improve urban grain
			guidance. This is particularly important for	and permeability. The following amendments have
			one-way road layouts, widths of	been made to the titles on pages 53, 54, 55, 56, 57
			carriageways, cycle lanes and footways,	and 58 to state that these sections are concepts.
			layout of on street parking, road crossings	Pages 55, 56, 58, 59, 60, 61, 62 - Changed title
			and raised tables. Suffolk County Council	from 'Palette' to 'Indicative Palette'.
			welcomes further engagement as the	
			document develops, particularly regarding	
			highway safety. Reference to Crown	
			Street, High Street, Whapload Road, Wilde	
			Street and The Scores includes suggested	
			changes to layout, alignment and use as	
			well as drawings that specify width of	
			carriageways, cycle ways and footways.	
			Suffolk County Council favours the	
			approach of creating principles of	
			development rather than specific designs	
			for particular places as part of a design	
			guide. The inclusion of highway specifics	
			raises expectations without undergoing	
			due process. Consideration should be	
			given to the mix of traffic. Proximity of	
			leisure and employment areas increases	
			the interaction between vulnerable road	
			users and traffic.	

Suffolk	130	Observation	8.5 Preservation of historic surfaces is an	The materials section has been amended to state
County	130	Observation	important part of conservation, but this	that the HAZ Design Guide sets high aspirational
Council			· · · · · · · · · · · · · · · · · · ·	5 .
			should only be reserved for the most	design standards for the public realm. The
(Cameron			important areas. It is likely that were these	importance of the High Street and The Scores to
Clow)			areas to be removed in order to carry out	the HAZ area means that the HAZ Design Guide
			repairs they would be replaced with	suggests the use of granite setts as paving
			asphalt, which would lead to a	material. However alternative materials have been
			deterioration of the area. Granite setts can	suggested for Whapload Road. The Materials
			be slippery, and this is a particular concern	section on page 51 states that the selection of
			for those with mobility issues. This	surface materials should take user safety into
			problem is likely to increase as the	account. Furthermore, safety should not be
			population ages. It is noted that the	ignored in the interests of appearance and that
			document proposes mixing granite with	non-slip surfaces and handrails should be added
			concrete and so this may be acceptable in	where necessary.
			small areas. However, granite should be	·
			avoided in areas with high pedestrian	
			footfall.	
Suffolk	131	Observation	8.0 Suffolk County Council agrees with	The Street Furniture section on page 50 refers to a
County			guidance regarding street furniture. This	minimum space of 1.2 metres, which is needed to
Council			should be of a standard design so that it is	ensure accessibility and usability for all.
(Cameron			easier to maintain and replace. Non-	chounce accessionicy and accessincy for ani
Clow)			highway furniture placed in the highway	
Clowy			will need to be licenced. It is noted that	
			street furniture should leave a clear space	
			•	
			of 1.2 metres for pedestrians. The ideal	
			minimum would be 2 metres to leave	
			space for those with mobility issues,	
			wheelchairs and buggies.	

Cff all.	122	Observatia :	10.1 Handing Ciana Conserved unions	The height of eventone even evel event has been
Suffolk	132	Observation	10.1 Hanging Signs. Suggested minor	The height of overhang over cycleways has been
County			changes to guidance for hanging signs. 2.4	amended to 2.7 metres. The guidance has been
Council			metre clearance is adequate for footways,	amended to state that signs overhanging the
(Cameron			but 2.7 metres is needed for cycle ways.	highway need to be licenced. Bullet points 5 and
Clow)			Guidance should state that hanging signs	10 have been amended so that there is only one
			over highways should be licenced by the	reference to the 2.4 metre clear height standard.
			Highway Authority to avoid obstruction	
			and safety issues.	
Suffolk	133	Observation	8.0 Changes to the public realm could also	A new 'Parking' subheading has been introduced.
County			be integrated with changes to parking.	This explains how parking measures will relate to
Council			Parking is key to the public realm and	the wider streetscape. Public realm proposals that
(Cameron			should be designed so as not to block	impact upon parking will be integrated with
Clow)			pedestrian desire lines. Reducing parking	parking management and enforcement strategies.
			in the area would reduce car use, cut air	
			pollution and encourage more sustainable	
			forms of transport.	
Suffolk	134	Observation	8.0 It is not clear how proposed public	Page 46 has been amended to refer to the
County			realm improvements fit into wider	Waveney Cycle Strategy. This document notes the
Council			strategies for the area, for example, town	importance of improved linkages to residential
(Cameron			centre regeneration. Public realm and	areas as well as describing current cycle and bus
Clow)			highway improvements also have the	routes within the HAZ area. Key improvements to
			potential to contribute towards delivery of	the North Denes Promenade and the High Street
			the Waveney Cycle Strategy. The HAZ	have been included. Page 46 has been amended
			Design Guide could provide guidance	to reference potential improvements to cycle
			about delivery of objectives in the cycle	routes. Page 47 also states that a bus route along
			strategy. This includes, for example,	the High Street could be incorporated into
			improving cycle access along The High	detailed regeneration plans subject to
			Street.	consultation with Suffolk County Council Highway
				Authority.
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Suffolk County Council (Cameron Clow)	135	Observation	8.0 Suffolk County Council supports grey to green proposals set out in the guidance. Tree planting helps to manage surface water, creates shade, adapting to climate change, increasing biodiversity and improving air quality. Planning appropriate infrastructure and selecting suitable species will help to design out issues relating to trees in the highway. The placement, design and long-term maintenance of rain gardens will require consultation with the County Council as Highway Authority and Lead Local Flood Authority.	The document has been amended to state that the placement of trees would help to enhance the public realm. This includes how tree planting could be used in combination with soft SUDs features to improve drainage, air quality and biodiversity as well as the appearance of the area. Information about SUDs has also been added to the landscape section but will be subject to further detailed work with Suffolk County Council as Local Highway Authority and Lead Local Flood Authority.
Suffolk County Council (Cameron Clow)	136	Observation	1.0. Reference needs to be made to how flooding and water management can be managed as well as the design of SUDs in the policy and guidance section. This includes policy WLP8.24 and the Suffolk Flood Risk Management Strategy. Public realm improvements can improve surface water conditions. There is a history of surface water flooding at the northern end of Whapload Road. Suffolk County Council should be involved in measures to improve the highway and public realm.	Section 4 Policy Advice and Guidance. Text has been added to the section about flooding to state that Beach Village was converted from residential to employment uses as a result of bomb damage caused during World War 2 and subsequent flooding. The new text also identified the parts of the HAZ at risk from flooding and explained the purpose of the Lowestoft Flood Risk Management Project. The paragraph at the top of page 9 has been moved to the policy section so that it is not spread across two columns.

Suffolk Police (Alan Keely)	83	Observation	4.0 This is an imaginative project that will help to regenerate the HAZ area. Suffolk Police request that the Design Guide references Crime Prevention Through Environmental Design and that this is used through all stages of the design process. the Police Designing Out Crime officer should be engaged from the outset. Reference is made in Appendix 1 to the main principles of CPTED.	Crime Prevention through Environmental Design and Secured by Design have both been mentioned in the list of useful policies. Further reference to addressing crime has also been added to chapter 8 on the public realm.
-----------------------------------	----	-------------	--	--

Suffolk	87	Observation	1.0 SPS welcomes the commissioning of	The wording has been strengthened to emphasise
Preservation			this bold and aspirational document, in	the need to retain historic materials and further
Society			particular the traffic management	guidance has been included on landscaping.
(Fiona			arrangements that will prioritise the	Typographical errors have been corrected.
Cairns)			pedestrian. The regeneration of The	
			Scores using high quality ground surfaces	
			is welcomed. Public realm enhancements	
			will make Lowestoft a more attractive	
			place and drive economic regeneration.	
			The use of gable ends for artwork will	
			create focal points and a sense of identity.	
			Focus on how to produce high quality	
			design is endorsed by the SPD.	
			Comprehensive townscape analysis	
			provides logical guidance for decision	
			making and encouraging contemporary	
			responses to the townscape. The SPS	
			would like to make the following points:	
			Page 37; item 21 - should read	
			"materiality". Page 41; line 9 - should read	
			"limited". Page 43 - A wavy wall is referred	
			to as a serpentine wall or crinkle crankle	
			wall. <b>49 Landscaping</b> - This section is too	
			brief, and more information is needed	
			about landscaping. Page 50 Materials -	
			Greater emphasis is needed on the	
			retention and restoration of historic	
			materials. Page 52 - The term rain garden	
			needs to be defined and explained. Page	
			<b>76</b> - Typo: 'tansom' should read 'transom'.	

Suffolk Preservation Society (Fiona Cairns)	88	Observation	7.1 Page 37; item 21 - should read "materiality".	Typo corrected.	
Suffolk Preservation Society (Fiona Cairns)	89	Observation	7.3 Page 41; line 9 - should read "limited".	Typo corrected.	
Suffolk Preservation Society (Fiona Cairns)	90	Observation	7.4 Page 43 - A wavy wall is referred to as a serpentine wall or crinkle crankle wall.	Wavy wall has been changed to crinkle crankle wall.	
Suffolk Preservation Society (Fiona Cairns)	91	Observation	8.0 Page 49 Landscaping - This section is too brief, and more information is needed about landscaping. Page 50 Materials - Greater emphasis is needed on the retention and restoration of historic materials. The "where possible" reference is weak and undermines the document's efforts to positively manage change.	Text has been added to explain that tree planting would not be possible within the High Street due to impact on the street scene and lack of space below street level. Climatic conditions would make tree planting unsuitable, except in certain designated areas. The text on page 51 to state that significant historic surfaces should be retained, reinstated or refurbished.	
Suffolk Preservation Society (Fiona Cairns)	92	Observation	8.2 Page 52 - The term rain garden needs to be defined and explained.	Rain garden is also referred to as SUDs or opportunity for sustainable drainage within the Design Guide.	

Suffolk Preservation Society (Fiona Cairns)	93	Support	10.1 Page 76 - Typo: 'tansom' should read 'transom'.	Typo corrected.
Wendy Brooks	95	Support	1.0 Generally supports the design guide. Likes the idea of making the High Street one way and of green spaces along the High Street and A47 with an additional crossing. Abandoned space behind the Town Hall should be turned into a heritage park to encourage families into the area. There is not enough provision for cycling in the Hight Street - one set of racks is not enough. A-boards should not be allowed on the High Street because they look ugly. Bin storage is a problem that needs to be considered in depth. The consultation should be widened because many people were excluded. The document should have been written with the local population in mind because it is very wordy and long. Supports narrowing the road along Whapload Road and increasing garden spaces there. Not convinced that PowerPark can ever be an inspiring area.	Comments noted. Proposals for a heritage park are beyond the scope of the HAZ Design Guide. The HAZ Design Guide includes proposals to improve the appearance of the High Street and cycle parking provision. It also includes guidance concerning bin storage. The HAZ Design Guide was written as concisely and clearly as possible given the need to include a lot of technical and local detail. It was also subject to two rounds of public consultation, both of which were advertised to members of the public.

Wendy	96	Support	1.0 Understands the need for a colour	Comment noted.
Brooks			palette for buildings but disagrees that the	
			wood turning shop is not a good example.	
			It brightens up the Triangle Market. By	
			contrast the Old Chemists shop, which is	
			cited as a good example, is a poor colour	
			and the work is of a poor standard.	
Environment	148	Support	Agrees with the conclusions of the SEA	Comment noted.
Agency			Screening exercise.	
(Mark				
McDonald)				

#### Consultees - Public Consultation

#### Specific consultation bodies

The Coal Authority

**Environment Agency** 

Historic England

Marine Management Organisation

Natural England

Network Rail

Highways Agency

Suffolk County Council

Parish and Town Councils within and adjoining the East Suffolk District

Suffolk Constabulary

Adjoining local planning authorities – Ipswich Borough Council, Babergh District Council, Mid Suffolk District Council, South Norfolk District Council, Great Yarmouth Borough Council and the Broads

Authority

NHS England and the Care Commissioning Groups

Anglian Water

Essex and Suffolk Water

Homes England

Electronic communication companies who own or control apparatus in the District

Relevant gas and electricity companies

#### General consultation bodies

Voluntary bodies some or all of whose activities benefit any part of the District

Bodies which represent the interests of different racial, ethnic or national groups in the District

Bodies which represent the interests of different religious groups in the District

Bodies which represent the interests of disabled persons in the District

Bodies which represent the interests of persons carrying on business in the District

#### Examples include:

Most Easterly Community Group

Community Action Suffolk

**Beccles Society** 

Greater Anglia Ltd

Home Builders Federation

New Anglia Local Enterprise Partnership

Norfolk & Suffolk Gypsy Roma and Traveller Service

Sport England

Suffolk Coast & Heaths AONB

Suffolk Constabulary

Suffolk Fire and Rescue Service

**Suffolk Preservation Society** 

Suffolk Wildlife Trust

Theatres Trust

The Woodland Trust

Woodbridge Chamber of Trade & Commerce

#### Other individuals and organisations

Includes local businesses, high schools, individuals, local organisations and groups, planning agents, developers, landowners, residents and others on the Local Plan mailing list.

#### Poster

# NORTH LOWESTOFT HERITAGE ACTION ZONE DESIGN GUIDE

East Suffolk Council in partnership with Historic England, Lowestoft Town Council and East Suffolk Building Preservation Trust are consulting on a Design Guide to promote the renovation, repair and economic regeneration of historic North Lowestoft.

The Supplementary Planning Document will be a material consideration in the determination of planning applications.

Find out more and give your views on the draft Supplementary Planning Document online:

### www.eastsuffolk.gov.uk/HAZ

Alternatively, view a copy at Lowestoft Library, Marina Customer Service Centre or Riverside in Lowestoft, East Suffolk House in Melton or the Customer Service Centre at Woodbridge Library.

Comments to be received by **5pm on 24**<sup>th</sup> **January 2020** 



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planningpolicy@eastsuffolk.gov.uk ⊠ 01502 523029 or 01394 444557 🕾









## Twitter post







Planning Policy and Delivery Team (Local Plans) planningpolicy@eastsuffolk.gov.uk

Development Management (Planning Applications) planning@eastsuffolk.gov.uk



Customer Services 03330 162 000



East Suffolk District Council Planning Policy and Delivery Team Riverside, 4 Canning Road, Lowestoft Suffolk NR33 0EQ

This document is available in alternative formats and in different languages on request. If you need support or assistance to help you read and/or understand this document, please contact the Council using one of the methods above.

www.eastsuffolk.gov.uk/localplan

Your reference number is EQIA196666270.

Agenda Item 6 ES/0366

Thank you for submitting Equality Impact Analysis (EqIA)

Service area/Team conducting EqIA: Planning Services

Officer conducting the EqIA:: lan Johns

Officer email address:: ian.johns@eastsuffolk.gov.uk

Responsible Cabinet Member:: Cllr David Ritchie

**Title of project / policy / Initiative or Action relating to this EqIA::** North Lowestoft Heritage Action Zone Design Guide SPD

Brief description of what the project / policy / initiative or action aims to achieve:: The North Lowestoft Heritage Action Zone (HAZ) Design Guide SPD provides practical guidance about development as well as the repair and regeneration of buildings and public spaces within the HAZ area.

Date of EqIA:: 16/04/2020

Age: Positive

**Reason for your decision:** Improvements to the public realm will improve accessibility and navigability, which will benefit the elderly and those with dementia.

**Disability:** Positive

**Reason for your decision:** Improvements to the public realm will improve accessibility and navigability, which will benefit those with a disability.

Gender reassignment: No impact

**Reason for your decision:** The document provides design guidance and therefore will not discriminate against this group.

Marriage and civil partnership: No impact

**Reason for your decision:** The document provides design guidance and therefore will not discriminate against this group.

Pregnancy and maternity: No impact

**Reason for your decision:** The document provides design guidance and therefore will not discriminate against this group.

Race: No impact

**Reason for your decision:** The document provides design guidance and therefore will not discriminate against this group.

Religion or belief: No impact

**Reason for your decision:** The document provides design guidance and therefore will not discriminate against this group.

Sex: No impact

**Reason for your decision:** The document provides design guidance and therefore will not discriminate against this group.

Sexual orientation: No impact

**Reason for your decision:** The document provides design guidance and therefore will not discriminate against this group.

What evidence or data has been collated or used to support the completion of this Equality Impact Analysis?: Public consultations and engagement (stating any specific groups you engaged with or surveys referred to), Engagement with other internal teams/ departments, Information from statutory partner organisations

Please give details for Public Consultations: The HAZ Design Guide was subject to two rounds of consultation: 1. preliminary consultation, which included key stakeholders and a public exhibition; 2. a full public consultation. The first stage of consultation included a meeting with key stakeholders and a public exhibition. The second stage of consultation was a full public consultation. This received responses from members of the public as well as a number of organisations. Elected members were contacted regarding this second stage of consultation. An EQIA was also undertaken on the draft SPD and was published alongside the draft SPD for consultation. As a result of feedback from Suffolk County Council during the public consultation the document was amended to ensure that there is a 1.2 metre space around street furniture to ensure accessibility for all street users. The text has also been amended to ensure that safety is taken into account when planning the use of granite setts.

**Please give details for Engagement:** The project to prepare the HAZ Design Guide has been undertaken by the Planning Policy and Delivery Team in Partnership with the Economic Regeneration Team. The economic regeneration team, HAZ team and Great Places Team were involved in the preliminary consultation. Internal teams and departments were notified as part of the full public consultation.

Please give details for Information from Statutory partner: Both stages of consultation included engagement with statutory consultees, including Suffolk County Council and Historic England.

Do you require any information or outcome relating to the policy, project, initiative or action to be presented to the public in a different language or form and how do you propose to do this?: The adopted document will be published on the Council's website as well as in hard copy. When the document is requested in another language the customer services team will be involved with ensuring this request is actioned.

As a result of completing this EqIA, has the Author, Service Team, Project Manager etc. made any changes or adjustments to the Policy / Project / Initiative or Action?: No

Is the policy, project, initiative or action subject to equality monitoring?: No

Agenda Item 6 ES/0366

# Strategic Environmental Assessment Screening Opinion

North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document

April 2020



# **Contents**

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#### 1. Introduction

- 1.1 In some circumstances a Supplementary Planning Document (SPD) could have significant environmental effects and may fall within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 and so require Strategic Environmental Assessment.
- 1.2 This screening report is designed to test whether or not the contents of the North Lowestoft Heritage Action Zone Design Guide SPD requires a full Strategic Environmental Assessment (SEA). The legislative background below outlines the regulations that require the use of this screening exercise. Section 4 provides a screening assessment of the likely significant effects of the SPD and the need for a full SEA.

## 2. Legislative Background

- 2.1 The basis for Strategic Environmental Assessment legislation is European Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the Environment'. This document is also known as the Strategic Environmental Assessment (or SEA) Directive. European Directive 2001/42/EC was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended, including through EU Exit legislation), or SEA Regulations.
- 2.2 The SEA Regulations include a definition of 'plans and programmes' to which the regulations apply. SEA requirements relate to plans or programmes which are subject to preparation or adoption by an authority at national, regional or local level, which includes those prepared for town and country planning and land use. SEA is required where the plan or programme is likely to have significant environmental effects. It is therefore necessary to screen the SPD to identify whether significant environmental effects are likely. Where screening identifies significant environmental effects, a full Strategic Environmental Assessment is required.

# 3. Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC

3.1 The preparation of the SPD triggers a requirement to determine whether it is likely to have a significant environmental effect. This requirement is discharged by the

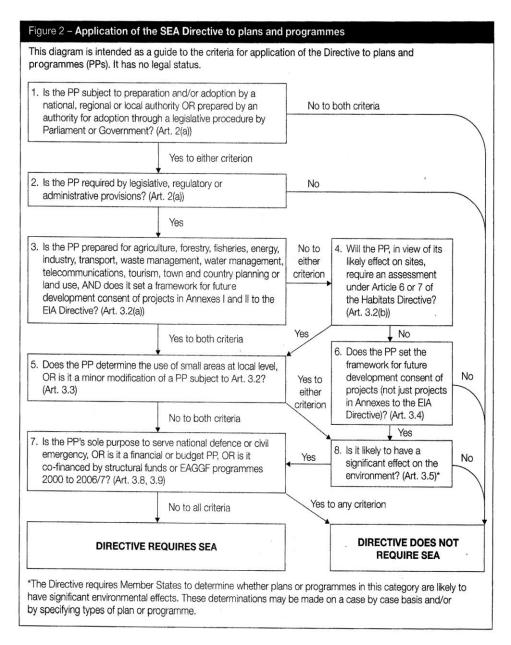
'responsible authority' being the authority by which or on whose behalf the plan is prepared. Before making a determination, the responsible authority shall: -

- Take into account the criteria specified in Schedule 1 to the Regulations;
   and
- b) Consult the consultation bodies.
- 3.2 The consultation bodies are defined in section 4 of the SEA Regulations. The opinions from the statutory consultation bodies: Historic England, the Environment Agency and Natural England, are therefore to be taken into account.
- 3.3 Schedule 1 of the SEA Regulations sets out the criteria for determining likely significant effects as follows:
  - 1. The characteristics of plans and programmes, having regards, in particular to:
    - a. The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.
    - b. The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.
    - c. The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.
    - d. Environmental problems relevant to the plan or programme.
    - e. The relevance of the plan or programme for the implementation of community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).
  - 2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:
    - a. The probability, duration, frequency and reversibility of the effects.
    - b. The cumulative nature of the effects.
    - c. The trans boundary nature of the effects.
    - d. The risks to human health or the environment (e.g. due to accidents).
    - e. The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
    - f. the value and vulnerability of the area likely to be affected due to:

- i. special natural characteristics or cultural heritage;
- ii. exceeded environmental quality standards or limit values;
- iii. intensive land-use: and
- g. the effects on areas or landscapes which have a recognised national, community or international protection status.

#### 4. Assessment

4.1 The diagram below illustrates the process for screening a planning document to ascertain whether a full SEA is required.



Source: A Practical Guide to the Strategic Environmental Assessment Directive (2005)

- 4.2 The following assessment applies the questions from the preceding diagram. The answers determine whether the North Lowestoft Heritage Action Zone Design Guide SPD will require a full Strategic Environmental Assessment.
  - 1. Is the PP subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))

Yes. The preparation and adoption of the North Lowestoft Heritage Action Zone Design Guide SPD is being carried out by East Suffolk Council. The North Lowestoft Heritage Action Zone Design Guide SPD is being produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))

Yes. The production of the SPD forms part of the delivery of the statutory Development Plan and the process for preparing SPDs is set out in the Town and Country Planning (Local Development) (England) Regulations 2012 and relates to the administration of the Council's planning service.

3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))

The SPD is prepared in support of the delivery of town and country planning and land use policies.

The SPD will not set a framework for the future consent of projects listed in Annexes I and II of the EIA Directive.

4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))

A separate screening exercise has been carried out under the Habitats Directive (92/43/EEC) and Conservation of Habitats and Species Regulations (2017) (as amended, including through EU Exit legislation). This has determined that a full Appropriate Assessment is not required.

5. Does the PP determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)

Not applicable (based on the responses to questions 3 and 4 above).

6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3(4))

Yes. The North Lowestoft Heritage Action Zone Design Guide SPD will be a material consideration in the determination of planning applications and will be applied alongside the policy framework provided by the Local Plan.

7. Is the PP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)

No. Not applicable.

8. Is it likely to have a significant effect on the environment? (Art. 3(5))

No. The guidance contained within the SPD seeks to improve and enhance the quality of the existing built fabric of the Heritage Action Zone. It also seeks to improve permeability through the area for cyclists and pedestrians. It is therefore unlikely that the SPD will have a significant impact upon the environment. Waveney Local Plan policies that impact upon the North Lowestoft HAZ, and to which this SPD relates, have been subject to a full Sustainability Appraisal, incorporating the requirements for Strategic Environmental Assessment. These include WLP2.1 (Central and Coastal Lowestoft Regeneration), WLP2.2 (Power Park), WLP2.5 (East of England Park), WLP2.9 (Historic High Street and Scores Area); WLP8.37 (Historic Environment), WLP8.38 (Non-Designated Heritage Assets), WLP8.39 (Conservation Areas) and WLP8.40 (Archaeology).

#### 5. Conclusion

The North Lowestoft Heritage Action Zone Design Guide SPD reviewed applies to a localised area and sets out design guidance for new development in the area. The North Lowestoft Heritage Action Zone Design Guide SPD policies seek to reflect and implement policies in the Waveney Local Plan which has been subject to Sustainability Appraisal including Strategic Environmental Assessment.

It is considered by East Suffolk Council that it is not necessary for a Strategic Environmental Assessment to be undertaken of the North Lowestoft Heritage Action Zone Design Guide SPD to ensure compliance with SEA legislation.

The draft Screening Opinion was published for consultation alongside the draft Supplementary Planning Document. The consultation bodies have each responded and concur with the conclusion of the Screening Opinion. The responses of the consultation bodies are contained in Appendix 1.

Signed: Dated: 09 April 2020

Desi Reed
Planning Policy and Delivery Manager
East Suffolk Council

# Appendix 1: Responses from Statutory Consultees



Mr Ian Johns
East Suffolk Council
Riverside 4 Canning Road
Lowestoft
Suffolk
NR33 0EQ

Our ref: AE/2020/124853/01-L01

Your ref: Lowestoft HAZ

Date: 03 February 2020

Dear Mr Johns

# NORTH LOWESTOFT HERITAGE ACTION ZONE - SEA SCREENING REPORT EAST SUFFOLK COUNCIL RIVERSIDE 4 CANNING ROAD LOWESTOFT NR33 0EQ

Thank you for consulting us on the SEA Screening Report for the Lowestoft Heritage Action Zone, which we received on the 13 December 2019.

We have reviewed the Screening report as submitted and do not disagree with the conclusions reached.

We trust this advice is useful.

Yours sincerely

Mr Mark Macdonald Planning Advisor

Direct dial Direct e-mail

Environment Agency
Cobham Road, Ipswich, Suffolk, IP3 9JD.
Customer services line: 03708 506 506
www.gov.uk/environment-agency
End



Mr Ian Johns
East Suffolk Council
Riverside
4 Canning Road
Lowestoft
NR33 0EQ

Direct Dial:

Our ref: PL00677505

31 January 2020

Dear Mr Johns

#### RE: North Lowestoft Heritage Action Zone Design Guide SPD SEA Screening

Thank you for inviting Historic England to comment on the above consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome this opportunity to review the Screening Report for this SPD. For the purposes of this consultation, Historic England will confine its advice to the question, "Is it (the SPD) likely to have a significant effect on the historic environment?". Our comments are based on the information supplied with the Screening Opinion.

The Screening Report indicates that the Council considers that the SPD will not have any significant effects on the historic environment, because it does not determine the uses of land at a local level, and does not set a framework for the consent of projects that fall under either Annexe I or II or the EIA Directive. It will support the delivery of local planning policy, as set out in the Local Plan.

On the basis of the information supplied, and in the context of the criteria set out in Schedule I of the Environmental Assessment Regulations [Annex II of 'SEA' Directive], Historic England concurs with the Council that the preparation of a Strategic Environmental Assessment is not required.

The views of the other two statutory consultation bodies should be taken into account before the overall decision on the need for an SEA is made.

I should be pleased if you can send a copy of the determination as required by REG 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.

We should like to stress that this opinion is based on the information provided by you with your correspondence dated 28 January 2020. To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the SPD) where we consider that,



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU
Telephone 01223 582749
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



despite the SEA, these would have an adverse effect upon the environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

Edward James Historic Places Advisor, East of England

CC:





24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749

HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



From: SM-NE-Plan Cons Area Team (Norfolk, Suffolk) (NE)

Sent: 18 December 2019 14:24

To: PlanningPolicy

Subject: 303581 East Suffolk North Lowestoft Heritage Action Zone Design Guide

SPD

#### For the attention of lan Johns:

Dear Ian

Thank you for consulting Natural England on the draft North Lowestoft Heritage Action Zone Design Guide Supplementary planning document and the accompanying HRA screening and SEA screening opinion documents.

I can confirm that Natural England agrees with the conclusions of both the SEA and HRA screening reports and has no further comments to make on either document. Furthermore we have no comments on the supplementary planning document.

Kind regards

Francesca

Francesca Shapland Lead Adviser, Planning & Conservation Suffolk Coast, Norfolk & Suffolk Team

#### www.naturalengland.org.uk

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Agenda Item 6 ES/0366

# Habitats Regulations Assessment Screening Statement

North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document

April 2020



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#### 1. Introduction

- 1.1 The European Habitats Directive¹ and Wild Birds Directive² provide protection for sites that are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species. The network consists of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both types can also be referred to as European Sites. The National Planning Policy Framework (NPPF) also states that Ramsar sites should be afforded the same level of protection as the European sites.
- 1.2 The requirement to undertake Habitats Regulation Assessment (HRA) of plans and projects is set out in the Conservation of Habitats and Species Regulations (2017) (as amended, including through EU Exit legislation).
- 1.3 Regulation 105 of the Conservation of Habitats and Species Regulations (2017) (as amended, including through EU Exit legislation) states:

'Where a land use plan:

- (a) Is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and
- (b) Is not directly connected with or necessary to the management of the site, the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.'
- 1.4 The HRA is therefore undertaken in stages and should conclude whether or not a proposal or policy would adversely affect the integrity of any sites.
  - Stage 1: Determining whether a plan is likely to have a significant effect on a European site. This needs to take account of the likely impacts in combination with other relevant plans and projects. This assessment should be made using the precautionary principle. The screening assessment must reflect the outcomes of the 2018 judgement of the Court of Justice of the European Union<sup>3</sup>, which has ruled that where mitigation is necessary this must be identified through an Appropriate Assessment.

<sup>&</sup>lt;sup>1</sup> 92/43/EEC

<sup>&</sup>lt;sup>2</sup> 2009/147/EEC

<sup>&</sup>lt;sup>3</sup> C-323/17 – People over Wind, Peter Sweetman v Coillte Teoranta

- Stage 2: Carrying out Appropriate Assessment and ascertaining the effect on site integrity. The effects of the plan on the conservation objectives of sites should be assessed, to ascertain whether the plan has an adverse effect on the integrity of a European site.
- Stage 3: Identifying mitigation measures and alternative solutions. The aim of this stage is to find ways of avoiding or significantly reducing adverse impacts, so that site integrity is no longer at risk. If there are still likely to be negative impacts, the option should be dropped, unless exceptionally it can be justified by imperative reasons of overriding public interest.
- 1.5 The North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document (SPD) is being produced by Place Services on behalf of East Suffolk Council working in partnership with Historic England, Lowestoft Town Council and the East Suffolk Building Preservation Trust (ESBPT). The SPD will apply to the area shown on the map in Appendix 2. This report considers whether there are likely to be significant effects on protected European sites and whether a full Appropriate Assessment may be required.
- 1.6 The adopted Local Plan is the East Suffolk Council Waveney Local Plan adopted 20 March 2019.
- 1.7 The East Suffolk Council Waveney Local Plan was subject to Habitats Regulations Assessment as part of its production. Where screening identified a likely significant effect, an Appropriate Assessment was undertaken and the mitigation measures identified were incorporated within the Plan, resulting in a conclusion that the plan will not lead to any adverse effects on European wildlife sites within and in the vicinity of the then Waveney District Council. The Appropriate Assessment identified recreational disturbance particularly from dog walkers as the main significant effect. The Council has subsequently finalised and published a Recreational Avoidance and Mitigation Strategy and requires payment towards mitigation from residential developments within 13km of the protected European sites.

## 2. Protected sites covered by this report

2.1 Sites included in this assessment are listed in Table 1. This includes all sites that are within 20km of the area covered by the North Lowestoft Heritage Action Zone SPD (for consistency with the distances applied within the HRA of the Waveney Local Plan and adopting the precautionary approach). The locations of the sites are shown on maps in Appendix 3 and the Qualifying Features and Conservation Objectives of the sites are contained in Appendix 4, along with a summary of the pressures and threats as documented in the Appropriate Assessment for the Local Plan.

Table 1: Relevant European protected sites

Name
The Broads SAC
Benacre to Easton Bavents Lagoons SAC
Minsmere to Walberswick Heaths and Marshes SAC
Dews Ponds SAC
Southern North Sea SAC
Broadland SPA
Benacre to Easton Bavents SPA
Outer Thames Estuary SPA
Minsmere-Walberswick SPA
Broadland Ramsar
Minsmere-Walberswick Ramsar

# 3. North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document

- 3.1 The North Lowestoft Heritage Action Zone is a five year initiative funded by Historic England that began in March 2018 and will run until March 2023. The Historic England initiative aims to use the potential of the historic environment to revive old places and create economic growth through partnership with local people and local authorities.
- 3.2 The Design Guide SPD was commissioned by East Suffolk Council in partnership with Historic England, Lowestoft Town Council and the East Suffolk Building Preservation Trust. The Design Guide introduces the northern area of Lowestoft explaining its historic importance, designation as Heritage Action Zone and the purpose of the

Design Guide to facilitate the delivery of high quality design. Once adopted, the Design Guide Supplementary Planning Document will be a material consideration in taking decisions on planning applications.

- 3.3 The Design Guide initially provides detail in sections 1-3 on the Heritage Action Zone initiative and intention to ensure places meet their potential and are attractive to residents, business, tourist and investors. The Design Guide describes the aims of the HAZ project to achieve this through joint working, grant funding, and skill sharing.
- 3.4 The aims and scope of the document are described as ensuring "new development conserves and enhances the character of the area and maximizes its contribution to the heritage led regeneration." Sections 4 and 5 of the Design Guide provide national and local planning policy context and detail the historic evolution of northern Lowestoft from the post-medieval to the modern day. A Statement of Historic Significance together with details of heritage assets and an analysis of the five main character areas is provided in Section 6. These key areas are the historic High Street, Whapload Road, the Power Park and surrounds, historic parklands, and the Scores (pedestrian passageways unique to the area).
- 3.5 Proposals that will enable high quality design to assist in the regeneration of the historic area are contained in sections 7-10 on the guidance for new development, public realm, alterations and shopfronts.
- 3.6 The guidance for new development analyses existing development in each of the five main character areas and identifies the key characteristics that new development should reflect. In the Whapload Road character area these include dominate gable frontages, long building depths, and a palette of pebbles, brick and painted brick wall. Guidance for new development also analyses the urban grain, movement, permeability and legibility of the heritage action zone. Key proposals include the provision of guidance on aspirational highway works to make the High Street a one-way road with increased footway space, providing a 'Tiger' crossing to reconnect Crown Street, and reducing the carriageway along Whapload Road.
- 3.7 The guidance for the public realm addresses street furniture, landscaping, materials, and key spaces for improvement. Design guidance is included on alterations to the junction between the High Street and Compass Street, High Street and Mariners Street, along Whapload Road, and several of the Scores, and guidance is also

- included on enhancing public open space associated with any potential one-way scheme on the High Street.
- 3.8 As detailed above, sections 1-6 of the Design Guide contain the background and context for the initiative, a description of the history and analysis of the character of the designated area. These sections do not propose specific actions or guidance. The guidance that supports high quality design to regenerate the historic area is contained in sections 7-10. Screening will therefore focus on sections 7-10 of the Draft North Lowestoft Heritage Action Zone Design Guide.

## 4. Other Plans and Projects

- 4.1 Regulation 105 of the 2017 Regulations (as amended, including through EU Exit legislation) requires consideration to be given to whether a Plan will have an effect either alone or in combination with other plans or projects.
- 4.2 As noted in the introduction, the other key plan is the Local Plan. The Local Plan was subject to Examination in autumn of 2018 and adopted at Full Council on 20<sup>th</sup> March 2019. The Local Plan sets out the broad scale and distribution of development across the northern area of East Suffolk formerly covered by Waveney District Council.
- 4.5 The North Lowestoft Heritage Action Plan Design Guide SPD provides detail in the implementation of policies in the adopted Waveney Local Plan as well as complementing the existing Built Heritage and Design Supplementary Planning Document adopted in April 2012 and the newly emerging Historic Environment Supplementary Planning Document which is in production.
- 4.6 The existing Built Heritage and Design Supplementary Planning Document can be found at <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Supplementary-Planning-Documents/Historic-Buildings-and-Conservation-Areas/01-Adopted-Built-Heritage-and-Design-SPD-.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Supplementary-Planning-Documents/Historic-Buildings-and-Conservation-Areas/01-Adopted-Built-Heritage-and-Design-SPD-.pdf</a>
- 4.7 Through the production of the Waveney Local Plan, a screening process considered each policy in the Local Plan and concluded whether significant effects are likely and that an Appropriate Assessment is needed. The Appropriate Assessment of The Waveney Local Plan has subsequently considered the following themes
  - Transport and air quality
  - Water quality

- Flood risk and coastal erosion,
- o Tourism, retail and employment development, and
- o Recreation (described as visitation in the HRA)
- 4.8 Mitigation measures were identified within the Appropriate Assessment and were incorporated within the Local Plan, resulting in a conclusion that the plan will not lead to any adverse effects on European wildlife sites within and in the vicinity of the (then) Waveney District.

# Assessment of likely effects of the North Lowestoft Heritage Action Zone Design Guide on European protected sites

- Action Zone Design Guide SPD in relation to whether there is potential for a likely significant effect on protected European sites. This constitutes Stage 1 as set out under paragraph 1.4 above. Consideration is given to the characteristics and location of the protected sites. The relevant sections are considered within the context of the Local Plan policies from which they hang and which have themselves been subject to Habitats Regulations Assessment, as set out in section 4 above. These Local Plan policies can be found in Section 2 Strategy for the Lowestoft Area and Section 7 District-Wide Strategic Planning Policies and include;
  - Local Plan Policy WLP2.2 Power Park
  - Local Plan Policy WLP2.5 East of England Park
  - Local Plan Policy WLP2.9 Historic High Street and Scores Area
  - Local Plan Policy WLP8.12 Existing Employment Areas
  - o Local Plan Policy WLP8.18 New Town Centre Use Development
  - Local Plan Policy WLP8.19 Vitality and Viability of Town Centres
  - o Local Plan Policy WLP8.23 Protection of Open Spaces
  - o Local Plan Policy WLP8.29 Design
  - Local Plan Policy WLP8.30 Design of Open Spaces
  - o Local Plan Policy WLP8.37 Historic Environment
  - Local Plan Policy WLP8.31 Lifetime Design
  - Local Plan Policy WLP8.38 Non Designated Heritage Assets
  - Local Plan Policy WLP8.39 Conservation Areas
- 5.2 At the time Natural England advised the potential for traffic increases in close proximity to European sites as a result of increased development, potentially leading to air quality impacts, and the potential for recreation impacts as a result of the quantum of housing proposed, could specifically lead to disturbance of birds, and damage to sensitive habitats. The subsequent Habitats Regulations Assessment of the Waveney Local Plan by Footprint Ecology included recommendations that were added to the plan. It concluded that the Waveney Local Plan conformed with Habitats Regulations and adverse impacts would be prevented.

Table 3: Likely significant effects of the North Lowestoft Heritage Action Zone Design Guide

[Policy/ Section]	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
7.0 Guidance for	Analysis of existing	None	None	No
New	development and			
Developments:	identification of key			
Historic Core	characteristics and palette			
	of materials to be reflected			
	in new development and			
	inspirational images of infill			
	development.			
7.1 Guidance for	Analysis of existing	None	None	No
New	development and			
Developments:	identification of key			
Whapload Road	characteristics and palette			
	of materials to be reflected			
	in new development.			
7.2 Guidance for	Analysis of existing	None	None	No
New	development and			
Developments:	identification of key			
Power Park and	characteristics and palette			
surrounds	of materials to be reflected			
	in new development.			
7.3 Guidance for	Analysis of existing	None	None	No
New	development and			
Developments:	identification of key			
Parklands	characteristics and palette			
	of materials to be reflected			
	in new development.			
7.4 Guidance for	Analysis of existing	None	None	No
New	development and			
Developments:	identification of key			
The Scores	characteristics and palette			
	of materials to be reflected			
	in new development.			

[Policy/ Section]	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
7.5 Urban Grain, Movement, Permeability and Legibility	Proposals to make the High Street one-way and increase and prioritise pedestrian footways.	None	None	No
7.6 Reconnecting Crown Street	Proposal to create a 'Tiger' crossing to reconnect Crown Street.	None	None	No
8.0 Guidance for Public Realm: Street Furniture, Landscaping, Materials	Guidelines for the amount, durability, colour and positioning of street furniture. Guidance to care for green spaces. Guidance on surface materials for roads and pavements.	None	None	No
8.1 Public Realm Enhancement Identification Map	Map identifying the street typology and places for public realm improvements.	None	None	No
8.2 Historic Core: High Street	Proposal to make the High Street north bound only, reduce carriageway speeds, widen footpaths, introduce raingardens, use high quality surface materials and introduce discrete parking bays.	None	None	No

[Policy/ Section]	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
8.3 Whapload	Proposal to reduce	None	None	No
Road -South,	carriageway width, widen			
Whapload Road -	footways, introduce raised			
North	tables, improve links to The			
	Scores, and introduce			
	markings identifying the			
	location of the former Beech			
	Village.			
8.4 The Scores	Proposal to reduce	None	None	No
	carriageway to minimum,			
	widen footways and use			
	quality surface materials.			
8.5 Initial materials	Proposed type, style, and	None	None	No
and street	colour of materials and			
furniture palette	street furniture.			
8.6 Key Public	Proposal to create a public	None	None	No
Spaces	square outside the Blue			
	Anchor pub. Proposal for a			
	public space that highlights			
	the heritage of the Scores in			
	front of Christ Church.			
	Proposal to utilize flank			
	walls as canvasses.			
8.7 Plant Palettes	Proposed plant palette for	None	None	No
and Zoning	main character areas.			
9.0 Guidance for	Guidance on both internal	None	None	No
	and external alterations to	None	None	No
Alterations				
	existing buildings in the HAZ			
	area.			

[Policy/ Section]	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
10.0 Guidance for	Guidance on shopfront	None	None	No
Shopfronts	including history, design,			
	materials, colour palette			
	and advertisement.			

## 6. Summary and conclusions

- 6.1 The North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document will provide additional guidance to inform the regeneration of the area and the design of new development within the area. The guidance will be a material consideration in the determination of planning applications alongside the Waveney Local Plan. It includes information on the key characteristics to be reflected in the design of new development, proposals to improve the public realm, information to assist in high quality internal and external alterations of existing buildings, and guidance for the design of shopfronts.
- 6.2 The North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document will assist in securing high quality developments to be brought forward in the area. The guidance for new development, public realm, alterations and shopfronts will assist in the regeneration of the historic area. It will be instrumental in realising the full potential of the historic northern area of Lowestoft.
- 6.3 The Heritage Action Zone area is adjacent to the shoreline and in close proximity to the Broads. The area has been in employment, residential, retail and tourism use for years. The proposals and guidance relate solely to an existing, clearly defined, urban area of north Lowestoft.
- 6.4 Regeneration is expected to make a positive contribution to the local economy through increased visitation to retail and tourism uses in the Heritage Action Zone. The Design Guide is not likely to increase visitation to areas outside the Heritage Action Zone and settlement boundary of Lowestoft.
- 6.5 The guidance and proposals in the North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document are considered to have no significant adverse impact on any Natura 2000 sites either independently or in combination with other plans and strategies. It is therefore not considered necessary to undertake an Appropriate Assessment of the North Lowestoft Heritage Action Zone Design Guide Supplementary Planning Document.

6.6 The draft Screening Statement was published for consultation alongside the draft Supplementary Planning Document. Natural England, as the appropriate nature conservation body, were consulted on the draft Screening Statement and confirmed that they agree with the conclusions. Their response is contained in Appendix 5.

Signed: D. Road

Dated: 09 April 2020

Desi Reed
Planning Policy and Delivery Manager
East Suffolk Council

# Appendix 1: Sources of background information

- The East Suffolk Waveney Local Plan and Central Lowestoft Planning Policy
   Map can be found at:
  - https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/waveney-local-plan/
- The Draft Habitats Regulations Screening Report, July 2017, prepared by the former Waveney District Council can be found at: <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/First-Draft-Local-Plan/Habitats-Regulations-Screening-Report-Draft.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/First-Draft-Local-Plan/Habitats-Regulations-Screening-Report-Draft.pdf</a>
- The Habitats Regulations Assessment of the Waveney Local Plan, December 2018 prepared by Footprint Ecology can be found at:
   <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Habitats-Regulations-Assessment.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Habitats-Regulations-Assessment.pdf</a>

# Appendix 2: Map of the area covered by the North Lowestoft Heritage Action Zone Design Guide SPD



Red line defines the boundary of the area covered by the SPD.

# Appendix 3: Locations of European protected sites

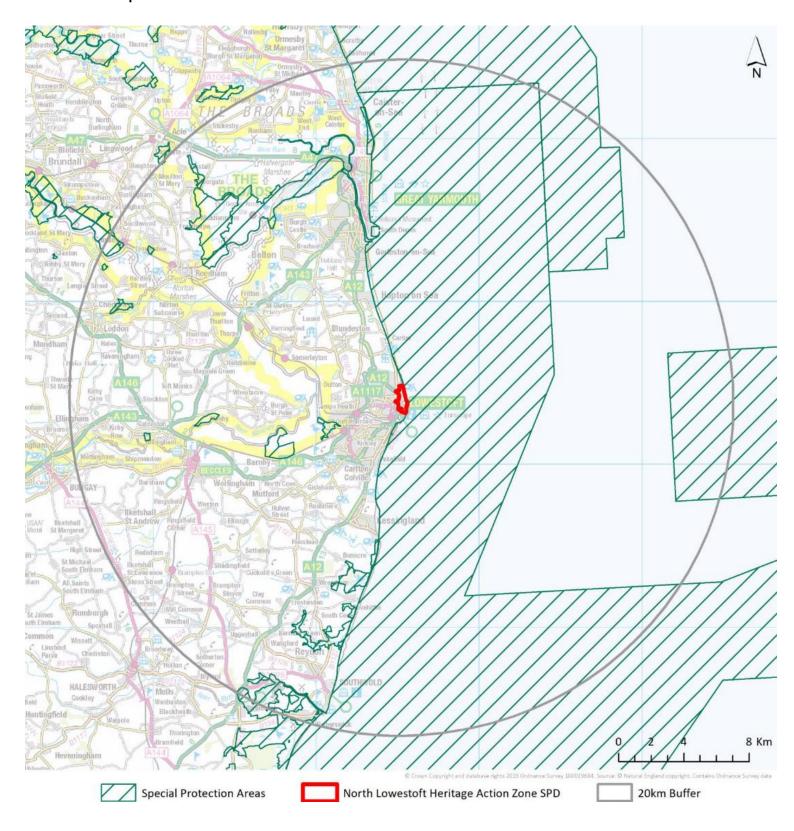
#### **RAMSAR**



#### **Special Areas of Conservation**



#### **Special Protection Areas**



# Appendix 4: Relevant European protected sites

Name	Qualifying Features	Conservation Objectives	Pressure and threats (as summarised in the Habitats Regulations Assessment for the Waveney Local Plan at Final Draft Plan
			Stage (2018)
Special Areas	of Conservation		
The Broads	H7210# Calcareous fens with Cladium mariscus and species of the Caricion davallianae S1016 Vertigo moulinsiana: Desmoulin's whorl snail H7230 Alkaline fens H6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) H91E0# Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) H7140 Transition mires and quaking bogs H3140 Hard oligo-mesotrophic waters with benthic vegetation of Chara spp H3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation S1355 Lutra lutra: Otter S1903 Liparis loeselii: Fen orchid	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats of qualifying species, The structure and function (including typical species) of qualifying natural habitats, The structure and function of the habitats of qualifying species, The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.	Water pollution, climate change, invasive species, siltation, inappropriate water levels, hydrological changes, water abstraction, change in land management, inappropriate ditch management, inappropriate scrub control, changes in species distributions, public access/disturbance, undergrazing, drainage, direct impact from 3rd party
	S4056 Anisus vorticulus: Little ramshorn whirlpool snail		

Benacre to	H1150# Coastal lagoons,	Ensure that the integrity of the site is	Public access/disturbance, water pollution,
Easton	A195(B) Sterna albifrons: Little tern	maintained or restored as appropriate, and	physical modification, changes in species
Bavents	A021(B) Botaurus stellaris: Great bittern	ensure that the site contributes to achieving	distributions, fisheries (marine and
Lagoons	A081(B) Circus aeruginosus: Eurasian	the Favourable Conservation Status of its	estuarine).
	marsh harrier	Qualifying Features, by maintaining or	
		restoring;	
		The extent and distribution of qualifying	
		natural habitats,	
		The structure and function (including typical	
		species) of qualifying natural habitats, and,	
		The supporting processes on which qualifying	
		natural habitats rely.	
Minsmere to	H4030 European dry heaths	Ensure that the integrity of the site is	Coastal squeeze, public access/disturbance,
Walberswick	H1210 Annual vegetation of drift lines	maintained or restored as appropriate, and	changes in species distributions, invasive
Heaths and	H1220 Perennial vegetation of stony	ensure that the site contributes to achieving	species, inappropriate pest control, air
Marshes	banks	the Favourable Conservation Status of its	pollution, water pollution, deer, fisheries
	A052(B) Anas crecca: Eurasian teal	Qualifying Features, by maintaining or	(commercial marine and estuarine)
	A021(B) Botaurus stellaris: Great bittern	restoring;	
	A081(B) Circus aeruginosus: Eurasian	The extent and distribution of qualifying	
	marsh harrier	natural habitats and habitats,	
	A082(NB) Circus cyaneus: Hen harrier	The structure and function (including typical	
	A224(B) Caprimulgus europaeus:	species) of qualifying natural habitats, and,	
	European nightjar	The supporting processes on which qualifying	
	A056(B) Anas clypeata: Northern	natural habitats rely.	
	shoveler		
	A056(NB) Anas clypeata: Northern		
	shoveler		
	A051(B) Anas strepera: Gadwall		
	A051(NB) Anas strepera: Gadwall		

Dew's Ponds	A132(B) Recurvirostra avosetta: Pied avocet A195(B) Sterna albifrons: Little tern A394(NB) Anser albifrons albifrons: Greater white-fronted goose S1166 Triturus cristatus: Great crested	Ensure that the integrity of the site is	None identified
	newt	maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of the habitats of qualifying species, The structure and function of the habitats of qualifying species, The supporting processes on which the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.	
Southern North Sea	<b>1351</b> Harbour porpoise <i>Phocoena</i> phocoena	To ensure that the integrity of the site is maintained and that it makes an appropriate contribution to maintaining Favourable Conservation Status (FCS) for harbour porpoise in UK waters.	Site not designated at time of Waveney Local Plan preparation.
Special Protect	tion Areas	1	I
Broadlands (also Ramsar site)	H7210# Calcareous fens with Cladium mariscus and species of the Caricion davallianae	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving	Water pollution, climate change, invasive species, siltation, inappropriate water levels, hydrological changes, water

	S1016 Vertigo moulinsiana: Desmoulin's whorl snail H7230 Alkaline fens H6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) H91E0# Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) H7140 Transition mires and quaking bogs H3140 Hard oligo-mesotrophic waters with benthic vegetation of Chara spp H3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation S1355 Lutra lutra: Otter S1903 Liparis loeselii: Fen orchid S4056 Anisus vorticulus: Little ramshorn whirlpool snail	the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats of qualifying species, The structure and function (including typical species) of qualifying natural habitats, The structure and function of the habitats of qualifying species, The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.	abstraction, change in land management, inappropriate ditch management, inappropriate scrub control, changes in species distributions, public access/disturbance, undergrazing, drainage, direct impact from 3rd party
Benacre to Easton Bavents	H1150# Coastal lagoons, A195(B) Sterna albifrons: Little tern A021(B) Botaurus stellaris: Great bittern A081(B) Circus aeruginosus: Eurasian marsh harrier	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features,	Public access/disturbance, water pollution, physical modification, changes in species distributions, fisheries (marine and estuarine).

A195(B) Sterna albifrons: Little tern
---------------------------------------

Outer	A001 (W) Gavia stellate Red-throated	Ensure that the integrity of the site is	
Thames	Diver	maintained or restored as appropriate, and	
Estuary	A195 (B) Sterna hirundo Common Tern	ensure that the site contributes to achieving	
	A193 (B) Sternula albifrons Little Tern	the aims of the Wild Birds Directive, by	
		maintaining or restoring;	
		The extent and distribution of the habitats of	
		the qualifying features,	
		The structure and function of the habitats of	
		the qualifying features,	
		The supporting processes on which the	
		habitats of the qualifying features rely,	
		The population of each of the qualifying	
		features, and,	
		The distribution of the qualifying features	
		within the site.	

## Appendix 5: Natural England Consultation Response

From: SM-NE-Plan Cons Area Team (Norfolk, Suffolk) (NE)

Sent: 18 December 2019 14:24

To: PlanningPolicy

Subject: 303581 East Suffolk North Lowestoft Heritage Action Zone Design Guide

SPD

#### For the attention of lan Johns:

Dear Ian

Thank you for consulting Natural England on the draft North Lowestoft Heritage Action Zone Design Guide Supplementary planning document and the accompanying HRA screening and SEA screening opinion documents.

I can confirm that Natural England agrees with the conclusions of both the SEA and HRA screening reports and has no further comments to make on either document. Furthermore we have no comments on the supplementary planning document.

Kind regards

Francesca

Francesca Shapland Lead Adviser, Planning & Conservation Suffolk Coast, Norfolk & Suffolk Team

#### www.naturalengland.org.uk

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.



#### **CABINET**

Wednesday 6 May 2020

# EAST SUFFOLK PERFORMANCE REPORT – QUARTERLY PERFORMANCE QUARTER 4 (2019-20)

### **EXECUTIVE SUMMARY**

- The East Suffolk Performance Report provides a summarised overview of the performance of the Council and is aligned to the strategic deliverables within the East Suffolk Business Plan. This Quarterly Performance Report covers Quarter 4, the period from 1 January 2020 to 31 March 2020.
- 2. If there are any instances where performance is not adequately meeting targets, these are highlighted in the report detailing the actions being taken. Some information on performance reporting is currently unavailable due to the impact being experienced by teams due to Covid-19, for example residual waste and recycling.
- 3. Performance reporting will form part of the governance arrangements for the new East Suffolk Strategic Plan implemented on 1<sup>st</sup> April 2020.

Is the report Open or Exempt?	Open
Wards Affected:	All wards in the District
Cabinet Member:	Councillor Steve Gallant, Leader of the Council
Supporting Officers:	Simon Taylor
Supporting Officers.	Chief Finance Officer and Section 151 Officer
	Tel: 01394 444570
	simon.taylor@eastsuffolk.gov.uk
	Lorraine Rogers
Finance Manager (Financial Planning) and Deputy S	
	Tel: 01502 523667
	lorraine.rogers@eastsuffolk.gov.uk

#### 1. INTRODUCTION

1.1 This Quarterly Performance Report has been produced to summarise the Council's performance for the fourth quarter of 2019/20 (1 January to 31 March 2020). It captures how the Council performed and reports against deliverables within the East Suffolk Business Plan. The report contains information provided by all individual services and key strategic partner organisations.

#### 2. REPORT

- 2.1 The report highlights activities and key achievements under each of the strategic deliverables (Economic Growth, Enabling Communities and Financial Self-Sufficiency) and Key Performance Indicators (KPIs) monitor performance.
- 2.2 Performance has been captured in each service area which includes an analysis of performance indicators (incorporated KPIs) and measures. This includes key indicators which reflect the direction of travel in terms of the Council's performance. Performance of partners is included within KPIs and other performance updates. Progress and targets relating to corporate risks are also summarised.
- 2.3 This report is managed on a continued improvement and development approach which may result in further changes to the existing format.

#### 3. OTHER OPTIONS CONSIDERED

3.1 Quarterly Performance Reports enable the Cabinet, other Members of the Council and the public to scrutinise the performance of the Council against strategic deliverables and key indicators in accordance with the approved Business Plan.

#### **RECOMMENDATION**

That the East Suffolk Performance Report for Quarter 4 be received by Cabinet

APPENDICES	
Appendix A	National Performance Indicators and LG Inform PIs

BACKGROUND PAPERS	
None	



# East Suffolk Performance Report Quarter 4 (2019/20)

# **Content Page**

		Page No.
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1.	Performance Criteria	3
2.	KPI Overview	3
3.	Economic Growth	4 - 5
4.	Enabling Communities	6 - 10
5.	Financial Self-Sufficiency	11 - 15
6.	Business Rates, Council Tax and Housing Benefit	15 - 18
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	Appendix A: National and LG Inform Performance Indicator	21 - 25

### Highlights Quarter 4 / end of year (2019/20) - 1 January to 31 March 2020

#### **Economic Growth**



#### **Key Performance Indicators (KPIs)**

Red	Amber	Green	Yearly KPI		
1	0	3	1		

#### **Highlights**

- 4,206 businesses engaged with (target: 402) in Quarter 4 and 6,929 in year (target: 1,638), 595 businesses received direct support in Q4
- £743,808 income generated (target: £509,009) in Q4, £2,060,946 for year exceeding target of £644,004
- 99% food hygiene rating (target: 95%) in year (all quarterly targets exceeded)
- <u>Provisional</u> Net dwellings completed for year 712 (target: 916)
- Minor planning applications 80% (107 of 133) in Q4 and 75.3% (430 of 571) in year determined in 8 weeks (target: 65%)
- Major planning applications 100% (13) in Q4, 88.2% (60 of 68) in year determined in 13 weeks (target: 60%)
- Other planning applications 82% (309 of 375) in Q4 and 86.8% (1435 of 1652) in year (target: 80%)

#### **Enabling Communities**



**Key Performance Indicators (KPIs)** 

Red	Amber	Green	Yearly KPI (n/a)
0	3	2	8

#### Highlights

- 209 affordable homes completed in year (target: 250), 117 affordable units under Construction at end of year
- Residual waste and recycling due to impact of Covid-19 monthly and quarterly operational performance suspended but will be collated retrospectively when business as usual resumes
- 51 applicants in temporary accommodation at end of Q4 (snapshot) and 227 in year
- 407 homeless preventions achieved under the Preventions Duty for the year

### **Financial Self-Sufficiency**



**Key Performance Indicators (KPIs)** 

te y i e i i o i i i a i e a i e a i e i e i e i e i e												
Dod	Amalaau	Croon	Yearly									
Red Amber		Green	KPI (n/a)									
3	1	8	0									

#### **Highlights**

- 474,332 visitors to East Suffolk website in year
- 99.5% in Q4 and year ICT network availability (target: 98%)
- 5.20 days taken to process Housing Benefit new claims (target: 12 days) quarterly and yearly targets achieved
- Local Authority Overpayments 0.17% (target 0.35%)
- 3.6% of abandoned calls in Q4 and 12.5% in year (target: below 10%)
- 44.19% in Quarter / 48.65% for year of complaints upheld/partially upheld (target: 30%)
- Learning from complaints 45.28% for year, all quarterly targets achieved (target: min 30%)
- Savings achieved At end of Q4 savings targets included in the 2019/20 budget were achieved

#### 1. Performance Criteria

The East Suffolk Performance Report summarises the Council's performance for each quarter. This report is in relation to Quarter 4 (1 April to 31 March 2020) for 2019/20. Information is reported on how the Council is performing against the strategic deliverables within the East Suffolk Business Plan, which includes detailed monitoring of KPIs. Appendix A captures progress on Performance Indicators (PIs) that are reported nationally or within LG Inform (LGA website publishes information allowing comparisons, transparency and benchmarking against other authorities). The table below explains symbols and criteria used to monitor and record performance within the Council.

Strategic Deliverables	Green	Target met			
	Amber	Within Tolerance / On track to be achieved	Identifies current RAG status for performance		
	Red	Target not met / significantly below			
	n/a				
Key Performance Indicators (KPIs)*	⊙ Green	Target met or exceeded	KPIs are defined nationally or		
	Amber	Performance slightly below target (within 5%)	by councils		
	Red	Performance significantly below target (more than 5%)			
	n/a	Not applicable for quarter (e.g. yearly only)			

<sup>\*</sup> Where these are used to show trends, performance is compared to the previous quarter.

Appropriate measures are in place to ensure that KPIs are monitored and improved in the future.

### 2. Key Performance Indicators Overview

Below is a summary of the Council's performance recorded against the strategic deliverables during Quarter 4 (2019/20):

		Quar	Yearly KPI		
Strategic Deliverables	Total	Red	Amber	Green	(not available)
Economic Growth	5	1	0	3	1
Enabling Communities	13	0	3	2	8
Financial Self-Sufficiency	12	3	1	8	0
Total	30	4	4	13	9

### 3. Economic Growth

Of the five KPIs for Economic Growth one was not applicable as it is a yearly target, three were green 'on target' and one red 'below target' for Quarter 4.

### **High-level Summary of the Current Status for each KPI**

Key Performance Indicator Economic Growth	Performance Indicator detail	Current Status Q4	End of year position
Income Generation	Income generated through project work (e.g. EZ's) or external funding	_ <u></u>	Above
	attracted	Green	target
Business Engagement	Total number of businesses engaged with	$\odot$	Above
business Engagement	Total Humber of businesses engaged with	Green	target
Land Regenerated	Total amount of land regenerated in m <sup>2</sup>	8	Below
Land Regenerated	Total allount of failu regenerated in in	Red	target
Nick devallings commissed	Not number of new borner completed	- /-	Below
Net dwellings completed	Net number of new homes completed	n/a	target
Food Hygiana Pating (9/ at 3 E)	Percentage at 3-5 food hygiene rating i.e. rated 'generally satisfactory' or	☺	Above
Food Hygiene Rating (% at 3-5)	better	Green	target

### **Full Performance Details for each KPI**

КРІ	KPI Detail	Current status for Q4	Q1 2019/20 Target	Q1 2019/20 Actual	Q2 2019/20 Target	Q2 2019/20 Actual	Q3 2019/20 Target	Q3 2019/20 Actual	Q4 2019/20 Target	Q4 2019/20 Actual	Yearly Target	End of Year Actual	Projected Direction (towards end of year actual)
Income Generation	☺	£130,000	£136,000	£5,000	£1,104,448	£0	£76,690	£509,004	£743,808	£644,004	£2,060,946	Above target	
	work (e.g. EZ's) or external funding attracted	Green	Income generated exceeded targets in Quarter 4, with Enterprise Zone income coming in near to its profiling, however, an additional £250,000 was awarded to Saxmundham Art Station project from NALEP growing places fund (£50k) and for East Suffolk Smart Towns Project from NALEP innovation fund (£200k). Both projects received support from the Economic Development Team.										
Business Engagement	Total number of businesses engaged with	☺	407	529	422	351	407	1,843	402	4,206	1,638	6,929	Above target
	engageu with	Green											

КРІ	KPI Detail	Current status for Q4	Q1 2019/20 Target	Q1 2019/20 Actual	Q2 2019/20 Target	Q2 2019/20 Actual	Q3 2019/20 Target	Q3 2019/20 Actual	Q4 2019/20 Target	Q4 2019/20 Actual	Yearly Target	End of Year Actual	Projected Direction (towards end of year actual)
Land Regenerated	Total amount of land regenerated in m <sup>2</sup>		500m²	<b>500</b> m <sup>2</sup>	3,900m <sup>2</sup>	0	0	7m²	123,300m²	0	127,700m²	507m²	Below target
		<b>⊗</b> Red	<ul> <li>Land Regenerated missed its Quarter 4 target, and therefore the annual target of 127,700m². This was as a result of delays suffered within the Lowestoft Ness project which had been profiled for completion in March 2020. The delays consisted of: <ul> <li>Signing off the occupancy agreement by the landowner, this was due to them being a very new entity and needing tire to put in place appropriate authorisation, policies and processes.</li> <li>Overcoming challenging site conditions and existing contamination identified in survey work undertaken.</li> <li>Covid-19 impact resulting in works being suspended on site. These works are about to resume, but with restrictions in place to ensure strict compliance with Government's guidelines and social distancing requirements.</li> </ul> </li> <li>We anticipate that works will be completed in Quarter 1 providing there are no further delays imposed through Covid-19.</li> </ul>										
Net dwellings	Net number of new homes		n/a	235	n/a	177	n/a	155	n/a	145	916	712	Below target
completed	completed	n/a	Provisional figure: The annual target of 916 is based on the addition of the adopted Local Plan housing figure (3 former Waveney area and most up to date figure (542) for the former Suffolk Coastal area using the Governme methodology for calculating housing need. Quarterly targets are not set as they can be volatile and almost implication influence over such a short time period.  Pigures for Quarter 4 delivery are provisional as completions from private inspectors are awaited and site visits possible due to Covid-19 restrictions. Construction stopped for many sites during Quarter 4 due to Covid-19 are explains the reduction in anticipated completions to 712. A further factor is the challenges facing the delivery of in parts of the District. However, with 848 dwellings under construction at the end of Quarter 4 it is anticipated Covid-19 restrictions are lifted, higher levels of growth will resume. The recent adoption of the Local Plan for the Waveney area and the advanced stage of the Local Plan for the former Suffolk Coastal area, increase certainty for and should also assist in increasing delivery.									vernment's ne ost impossible e visits have d-19 and this livery of brow cipated that, an for the for	not been in part vnfield sites once the mer
Food Hygiene Rating (% at	Percentage at 3- 5 food hygiene rating i.e. rated	☺	95%	98%	95%	98%	95%	99%	95%	99%	95%	99%	Above target
3-5)	'generally satisfactory' or better.	Green		nce through businesses		ar successfully	y exceeded	targets. A r	isk-based ap	proach will	continue to	be applied t	o poor

# 4. Enabling Communities

Of the 13 KPIs for Enabling Communities, two were on target 'green', three were 'amber' slightly behind target, four were not applicable due to targets currently being under review/yearly targets and four were unavailable due to the impact of Covid-19.

### **High-level Summary of the Current Status for each KPI**

Key Performance Indicator	Performance Indicator detail	Current Status Q4	End of Year Position
		Status Q+	TOSICION
Increase participation (Places for People)	Increase participation for all activities (PforP)- combined throughput (footfall) figures for all sites	Unavailable	Unavailable
Increase participation (Sentinel Leisure Trust)	Increase participation for all activities (SLT) combined throughput (footfall) figures for all sites	Unavailable	Unavailable
Number of homeless preventions under the Prevention Duty	Number of homeless preventions under the Prevention Duty	n/a	n/a
Number of homeless preventions under the Relief Duty	Number of homeless preventions under the Relief Duty	n/a	n/a
Percentage of applicants housed from the register who are in reasonable preference group	Percentage of applicants housed from the register	n/a	n/a
Affordable Homes Completed	Net number of new affordable homes completed	n/a	Below target
Disabled Facilities and Renovation Grants spent	Percentage of grant budget spent for Disabled Facilities and Renovation Grants	⊕ Amber	Below target
Disabled Facilities and Renovation Grants budget committed	Percentage of the grant budget committed (grants approved) for Disabled Facilities and Renovation Grants	⊕ Amber	Below target
Residential properties where category 1 hazards and significant cat 2 hazards have been remedied	Number of residential properties where category 1 and significant cat 2 hazards have been remedied: (a) by service of Notices; and (b) other action.	☺ Green	Above target
Debt owed as rent to the Council	Amount of debt owed as rent to Council as a percentage of the rental debit raised for the period.	⊕ Amber	Slightly below target
Void property	No. of calendar days a property is unlet for a routine 'void' (one that is not undergoing major works or defined as hard-to-let)	⊜ Green	Below target
Household waste sent for reuse, recycling and composting	Percentage of household waste sent for reuse, recycling and composting	Unavailable	Unavailable
Residual waste per household	Kg of waste per household	Unavailable	Unavailable

# **Full Performance Details for each KPI**

KPI	KPI Details	Current status for Q4	Q1 2019/20 Target	Q1 2019/20 Actual	Q2 2019/20 Target	Q2 2019/20 Actual	Q3 2019/20 Target	Q3 2019/20 Actual	Q4 2019/20 Target	Q4 2019/20 Actual	Yearly Target	End of Year Actual	Projected Direction (towards End of Year Actual)
Increase participation (Places for	Increase participation for all activities combined throughput (footfall) figures for all sites	Unavailable	146,739	187,840	225,900	222,001	212,493	227,555	227,028	Unavailable	812,160	Unavailable	Unavailable
People)			Due to the impact of Covid-19 Quarter 4 and end of year figures are unavailable.										
Increase participation (Sentinel	Increase participation for all activities combined throughput (footfall) figures for all sites		140,539	138,163	172,126	137,035	107,809	113,192	123,929	Unavailable	544,403	Unavailable	Unavailable
Leisure Trust)		Unavailable	Due to the impact of Covid-19 Quarter 4 and end of year figures are unavailable.										
Number of homeless	Number of	n/a	n/a	42	n/a	69	n/a	173	n/a	123	n/a	407	n/a
preventions achieved under the Prevention Duty	home-less preventions achieved under the Prevention Duty		recorded a the work a and record consistent	and capture activity to b d on the sys in Quarter	ed as prever e carried ou tem correct	ntion. The Cu at 'upstream tly. This has anticipating	ustomer Sei ' and gives now stabili	rvices Housi Housing Ne sed in the la	ng triage als eds Officers ast quarter a	so had a positi increased cap and reporting	ve impact be do	t now are bein because it has casework pre outcomes has ncial year as a	enabled evention s become
Number of homeless preventions	Number of home-less preventions under the Relief Duty		n/a	13	n/a	51	n/a	91	n/a	72	n/a	227	n/a
under the Relief Duty		n/a	relief but r	not a signifi	cant drop. 1	•	ion is norm	al. We are a	nticipating			neless prevent in prevention	

КРІ	KPI Details	Current status for Q4	Q1 2019/20 Target	Q1 2019/20 Actual	Q2 2019/20 Target	Q2 2019/20 Actual	Q3 2019/20 Target	Q3 2019/20 Actual	Q4 2019/20 Target	Q4 2019/20 Actual	Yearly Target	End of Year Actual	Projected Direction (towards End of Year Actual)
Percentage of applicants	or applicants coused from percentage of applicants re in peasonable register coreference  Percentage of applicants housed from the register		n/a	76%	n/a	77%	n/a	86.25%	n/a	86.17%	n/a	82.92%	n/a
register who are in reasonable preference group		n/a		For the year, the percentage housed from those reasonable preference groups was 82.92%. We let 984 properties through the register, 816 of these were to reasonable preference groups.									
Affordable Homes Completed	Net number of new affordable homes completed	fordable	n/a	106	n/a	26	n/a	28	n/a	49	250	209	Below target
			<u>Provisional figure</u> : The annual target of 250 is identified in the East Suffolk Housing Strategy based on 100 dwellings for the former Suffolk Coastal area and 150 for the former Waveney area. Quarterly targets are not set as they can be volatile and almost impossible to influence over such a short time period. The affordable housing completions for this year (209) have continued at a similar rate to last year's figure (215) despite the recent Covid-19 restrictions impacting construction, although still not meeting the overall target. With 117 affordable units under construction at the end of this year the level of development is anticipated to continue, subject to the lifting of Covid-19 restrictions. The recent adoption of the Local Plan for the former Waveney area and the advanced stage of the Local Plan for the former Suffolk Coastal area, increase certainty for developers and should assist in increasing delivery.										
Disabled Facilities and Renovation Grants spent	Percentage of grant budget spent for Disabled Facilities and Renovation Grants	<b>⊕</b> Amber	25% (DFG) 25% (RG)	DFG = 12.7% (12.84%) RG = 9.6%	25%	DFG = 16.6% (7.9%) RG = 20.8%	25%	DFG = 32.9% RG = 15.71%	25%	DFG = 24.03% RG = 14.63%	100%	DFG = 77.68% RG = 60.81%	Below target
			over 20% build to gi	below targe ve better d	et but as the elivery. App	e agency arr	angements r Renovatio	are due to on Grants ar	end in May 2 e beginning	ightly giving a 2020 this will I to come in as g improvemer	ead to othe expected in	er changes wh	ich should

КРІ	KPI Details	Current status for Q4	Q1 2019/20 Target	Q1 2019/20 Actual	Q2 2019/20 Target	Q2 2019/20 Actual	Q3 2019/20 Target	Q3 2019/20 Actual	Q4 2019/20 Target	Q4 2019/20 Actual	Yearly Target	End of Year Actual	Projected Direction (towards End of Year Actual)
Disabled Facilities and Renovation Grants	Percentage of the grant budget committed (grants approved) for		25% (DFG) 25% (RG)	DFG = 18.7% RG = 15.13%	25%	DFG = 7.8% RG = 13.74%	25%	DFG = 20.4% RG = 4.23%	25%	DFG = 12.55% RG = 24.95%	100%	DFG = 62.45% RG = 58.05%	Below target
budget committed	Disabled Facilities and Renovation Grants	⊕ Amber	led to ESC to support	serving ear t our clients use of this b	ly Notice to to access [	end the par OFG funding	tnership a but will be	rrangement introducing	which links new metho	us to Orbit. W ds of working	e have wo which we l	ncy performar rked with the nope will deliv th level of inte	Agency er more
Residential properties where	Number of residential properties where		(a) 20 (b) 10	(a) 2 (b) 39	(a) 20 (b) 10	(a) 6 (b) 18	(a) 20 (b) 10	(a) 5 (b) 31	(a) 20 (b) 10	(a) 17 (b) 27	(a) 20 (b) 100	(a) 30 (b) 93	On target
category 1 hazards and significant cat 2 hazards have been remedied	category 1 and significant cat 2 hazards have	<b>⊕</b> Green											
Debt owed as rent to the Council	Amount of debt owed as rent to the Council as a percentage of the rental debit raised for the period.		4.38%	4.34%	5.14%	4.69%	4.84%	4.44%	3.90%	4.16%	4.57%	4.41%	Slightly below target
		⊕ Amber	Whilst performance did not reach the set target, in monetary terms the arrears are at more than £100,000 less than the same point last year but because the debit raised was less due to the 1% rent reduction this has reflected in a higher % of the debit. We had seen a reduction in arrears all this year, however, due to the current Covid-19 crisis we are expecting a rise in arrears due to the effect on household incomes.										

КРІ	KPI Details	Current status for Q4	Q1 2019/20 Target	Q1 2019/20 Actual	Q2 2019/20 Target	Q2 2019/20 Actual	Q3 2019/20 Target	Q3 2019/20 Actual	Q4 2019/20 Target	Q4 2019/20 Actual	Yearly Target	End of Year Actual	Projected Direction (towards End of Year Actual)
Void property	No. of calendar days a property is unlet for a		25 days	35.6 days	25 days	33.3 days	25 days	42.5 days	25 days	20.1 days	25 days	32.9 days	Below target
	routine 'void' (one that is not undergoing major works or defined as hard-to-let)	☺ Green	We have completed a lot of work on our voids process and had started using the new process in January and can see a vast improvement in void turnaround times. However, at the current time Gateway to Homechoice is suspended and although we are trying to direct let voids there will be an impact on void turnaround times for the next few months due to Covid-19.										
Household waste sent for reuse, recycling and	Percentage of household waste sent for reuse, recycling and	Unavailable	46.62%	48.37%	46.72%	47.06%	45.15%	44.54%	39.72%	Unavailable	44.62%	Unavailable	tbc
composting (NI 192)	composting			•		onthly and our		perational re	porting has	been suspend	led but will	be collated	
Residual waste per household	Kg of waste per household		122.17Kg	115.12kg	111.85kg	115.93kg	111.85kg	111.63kg	114.83kg	Unavailable	460.29kg	Unavailable	tbc
		Unavailable		•		onthly and c		perational re	porting has	been suspend	led but will	be collated	

### **Waste Information**

Suffolk Coastal and Waveney Norse delivers the waste collection service on behalf of the Council. Due to the impact of Covid-19 monthly and quarterly operational reporting has been suspended but will be collated retrospectively when business as usual resumes.

#### Garden waste collection:

In the interests of crew safety and to ensure that household waste and recycling collections are prioritised, East Suffolk Council and East Suffolk Norse took the decision to temporarily suspend the collection of garden waste. The final round of garden waste collections took place on Friday 27<sup>th</sup> March 2020. The Council also temporarily suspended its food waste and glass collection services which are ordinarily provided in parts of Lowestoft. When garden waste collections recommence, subscriptions will be 'rolled forward', meaning that a new annual payment will be only required once each subscriber has received their full quota of 12 monthly collections.

# **5. Financial Self-Sufficiency**

Of the 12 KPIs for Financial Self-Sufficiency in Quarter 4, eight KPIs were 'green', one 'amber' and three were 'red'.

### **High-level Summary of the Current Status for each KPI**

Key Performance Indicator	Performance Indicator detail	Current Status Q4	End of Year Position
Financial Self-Sufficiency			
Complaints	Percentage of complaints upheld/partially upheld	⊗ Red	Below target
Learning from complaints	% complaints where learning has been implemented to prevent a recurrence	⊚ Green	Above target
Local Ombudsman Complaints with maladministration and/ or service failure	% of cases where the Ombudsman (LGSCO/HOS) find a service failure and/ or administration	⊗ Red	Below target
Abandon Call Rate	Percentage of calls abandoned	⊜ Green	Below target
Days taken to process Housing Benefit new claims and changes	Days taken to process Housing Benefit new claims and changes	⊜ Green	Above target
Local Authority Error Overpayments	Number of overpayments raised as a result of Local Authority error	© Green	Above target
Net Business Rates Receipts payable to the Collection Fund	Net Business Rates Receipts payable to the Collection Fund	⊕ Green	Above target
Net Council Tax Receipts payable to the Collection Fund	Net Council Tax Receipts payable to the Collection Fund	⊕ Green	Above target
Percentage of Corporate Sundry Debtors outstanding > 90 days	Percentage of Corporate Sundry Debtors outstanding > 90 days	⊗ Red	Below target
Strong balances (General Fund balance)	The Council maintains the level of General Fund balance at around 3%-5% (£3.6m-£6m) of its budgeted gross expenditure (in the region of £120m for East Suffolk).	© Green	On Target
Savings Achieved	Savings included in the budget for the year.	⊜ Green	On Target
Income Generation – fees and charges	Income generated for the General Fund from fees and charges	⊕ Amber	Slightly below target

КРІ	KPI Details	Current status for Q4	Q1 2019/20 Target	Q1 2019/20 Actual	Q2 2019/20 Target	Q2 2019/20 Actual	Q3 2019/20 Target	Q3 2019/20 Actual	Q4 2019/20 Target	Q4 2019/20 Actual	Yearly Target	Year to Date Actual	Projected Direction (towards End of Year Actual)
Complaints	Percentage of complaints upheld / partially upheld		Max 30%	49.83%	Max 30%	49.17%	Max 30%	49.11%	Max 30%	44.19%	Max 30%	48.65%	Below Target
		⊗ Red	Performance relating to upheld/partially upheld complaints remained below target in Quarter 4. Of 129 complaints closed in this period, 35 were related to Norse issues, (51% upheld). 28 complaints related to Revenues and Benefits issues, 46% of these were upheld. 17 complaints related to planning, of which 29% were upheld. 18 complaints related to Council housing, of which 78% were upheld. All other complaints related to various services. 11 complaints (9% of all closed complaints) were stage 2 complaints.  The number of complaints received has reduced further in this quarter. A review of KPIs and targets is currently under consideration although this may be delayed due to Covid-19 restrictions.										
Learning from complaints	% complaints where learning has been implemented to prevent a recurrence		Min 15%	43.25%	Min 15%	44.22%	Min 15%	47.34%	Min 15%	49.61%	Min 15%	45.28%	Above target
		⊕ Green	Learning from complaints to be reviewed. The percentage of complaints where learning is specified remained above target but repeat issues (across multiple customers) also remained high. A review of KPIs is currently under consideration although this may be delayed due to Covid-19 restrictions.										
Local Ombudsman	% of cases where the		0	18.18%	0	14.29%	0	0.00%	0	22.5%	0	14.29%	Below Target
Complaints with mal- administration and/or service failure	Housing official case, was found partially justified. A small amount of charges were rela						were refun						
			www.lgo.o Please not need to ga	e, comparative rg.uk. This care also that in rether evidence ate and take n	be accessed esponse to th from Counci	partway done COVID-19	own the hon restrictions	ne page. s the LGSCC	) have suspe	nded inves	tigation of c	omplaints whe	ere they will

КРІ	KPI Details	Current status for Q4	Q1 2019/20 Target	Q1 2019/20 Actual	Q2 2019/20 Target	Q2 2019/20 Actual	Q3 2019/20 Target	Q3 2019/20 Actual	Q4 2019/20 Target	Q4 2019/20 Actual	Yearly Target	Year to Date Actual	Projected Direction (towards End of Year Actual)	
Abandon Call Rate	Percentage of calls		10%	26%	10%	7.3%	10%	2.5%	10%	3.6%	10%	12.5%	Below target	
	abandoned		manageab			ce within target. Call volumes were rden Waste renewal subscriptions								
		⊜ Green	due to the	annual Counci	l Tax Billing pe	eriod and Ga	rden Waste	alls compared with Quarter 3, but this was in line with expectations subscriptions. Call volumes were also down by nearly 17,000 calls impact on the call handling times.						
			telephone contact the volumes as Staff availa	The impact of the Covid-19 pandemic has influenced the traditional call volumes and types during the last month. Changes to the celephone IVR messages has had a positive effect on call volumes as customers move to doing business on-line or have chosen not to contact the Council at this time. The suspension of the Garden Waste service has also contributed to a further reduction in call volumes as customers are unable to renew subscriptions.  Staff availability was higher than expected during the quarter with more staff available to handle incoming calls, particularly in the ast month, due to the restrictions in place.										
Days taken to process Housing	Days taken to process Housing	☺	12 days	11.36 days	12 days	8.52 days	10 days	7.42 days	8 days	5.20 days	12 days	5.20 days	Above target	
Benefit new claims and changes	Benefit new claims and changes	Green	Benefit processing exceeded its target for 2019/20.											
Local Authority Error Overp-	Number of overpayments raised as a	☺	0.35%	0.10%	0.35%	0.26%	0.35%	0.20%	0.35%	0.17%	0.35%	0.17%	Above target	
ayments	•	Green	The numbe	er of Local Aut	nority Error O	verpayments	exceeded i	ts target for 2	2019/20.					
Net Business Rates Receipts	Rates Rates Receipts Receipts payable to payable to the Collection		£26,069,598	£24,147,964	£51,535,547	£51,103,221	£74,791,849	£75,034,979	£92,792,211	£93,033,039	£92,792,211	£93,033,039	Above target	
payable to the Collection Fund		⊕ Green	notably in	cion Fund is ab respect of a £2 ve been collect	m refund for	•						-		

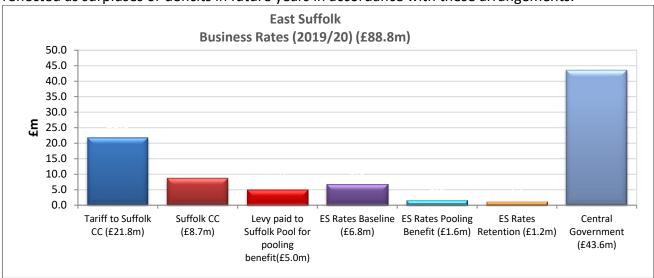
КРІ	KPI Details	Current status for Q4	Q1 2019/20 Target	Q1 2019/20 Actual	Q2 2019/20 Target	Q2 2019/20 Actual	Q3 2019/20 Target	Q3 2019/20 Actual	Q4 2019/20 Target	Q4 2019/20 Actual	Yearly Target	Year to Date Actual	Projected Direction (towards End of Year Actual)
Net Council Tax Receipts payable to the Collection	Net Council Tax Receipts payable to the Collection	☺	£43,341,163	£43,402,134	£84,797,656	£85,413,139	£126,320,823	£127,711,105	£151,052,401	£152,606,485	£151,052,40 1	£152,606,485	Above target
Fund	Fund	Green	As the tax base grows the net debit increases which should result in additional revenues being paid into the collection fund providing additional resources into the council's budget. The Net Collectable Debit started the year at £153,888,900.90 and ended the year at £153,991,451.63 giving an increase of £102,550.73.										
	Percentage of		<30%	35.25%	<30%	68.24%	<30%	52.16%	<30%	38.32%	<30%	38.32%	Below Target
Percentage of Corporate Sundry Debtors outstanding > 90 days	Corporate Sundry Debtors outstanding > 90 days	ල Red	The percentage of corporate sundry debtors outstanding for more than 90 days in Quarter 4 was 38.12%, again exceeding the target of <30%, but showing improvement on the previous quarter. Performance continues to be affected by CIL invoices, recovery of which is handled outside of the normal debt management process following set CIL regulations. Adjusting for CIL, underlying invoicing performance is 12.32%, which is well within target.  All old, undisputed debt has been through the reminder process and is currently with debt enforcement or undergoing pending legal										
			action. The Receivables Team continues to work closely with all service teams to ensure the council has an effective debt management process. This indicator continues to be closely monitored.										
Strong balances (General Fund balance)	The Council maintains the level of General Fund balance at around 3%-5%		£3.6m – £6m	£6,000,000	£3.6m -£6m	£6,000,000	£3.6m- £6m	£6,000,000	£3.6m- £6m	£6,000,000	£3.6m- £6m	£6,000,000	On target
	(£3.6m-£6m) of its budgeted gross expenditure (in the region of £120m for East Suffolk)	⊕ Green			-	nd forecast on ce during Quan		l Fund baland	ce is £6m as s	set out in the	2019/20 Bu	ıdget Report.	There has

КРІ	KPI Details	Current status for Q3	Q1 2019/20 Target	Q1 2019/20 Actual	Q2 2019/20 Target	Q2 2019/20 Actual	Q3 2019/20 Target	Q3 2019/20 Actual	Q4 2019/20 Target	Q4 2019/20 Actual	Yearly Target	Year to Date Actual	Project ed Directi on (toward s End of Year Actual)	
Savings achieved	Savings included in the budget for the year.	☺	£798,600	£798,600	£798,600	£798,600	£798,600	£1,266,600	£798,600	£808,600	£798,600	£808,600	Slightly above target	
		Green	costs. The c	original saving	_	ed a £300k sa	aving from Pa	artnerships. I	However, an	eased by £460l additional £47 e.		•		
Income Generation – fees and charges	Income generated from the General Fund	generated From the	£5,241,313	£5,857,285	£8,453,809	£9,106,332	£11,112,628	£11,893,712	£14,531,900	£14,267,800	£14,531,900	£14,267,800	Slightly below target	
charges (excludes HRA and Port Health)	from fees and charges	😑 Amber	Additional in £106k of add Reduction in income und	As at the end of Quarter 4, Fees and Charges income is £264k below the expected level of income for the year. The key variances are:  Additional income: Dover District Council, North East Lincolnshire Council and Belfast City Council have now joined the PHILIS system,  £106k of additional income this year; Development Management, Planning Applications and Land Charges, additional income of £300k.  Reduction in income: Beach Huts overnight stay beach hut project did not progress and the income not achieved was £355k; Car Parking ncome under achieved by £470k. Included in the Quarter 4 figures is the impact of Covid-19 on Fees and Charges income during March, this is approximately £300k across Car Parking, Planning Applications and Land Charges.										

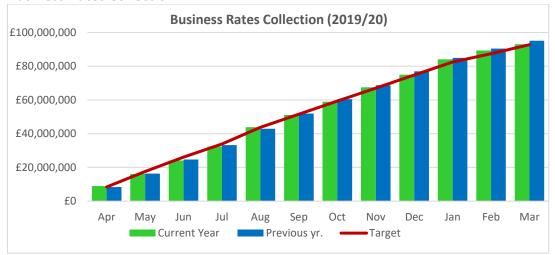
### 6. Business Rates, Council Tax and Housing Benefit

#### **Business Rates**

For illustrative purposes, the chart below shows the distribution of Non-Domestic Rates. The actual accounting entries for 2019/20 will differ from these figures primarily as a result of time lags in the national accounting arrangements for business rates. Increases or decreases in income are reflected as surpluses or deficits in future years in accordance with these arrangements.



#### **Business Rates Collection:**

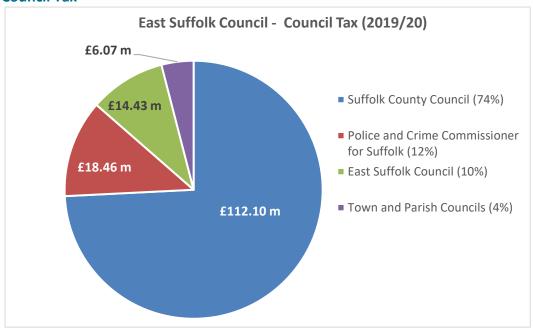


### Quarter 4/End of Year:

The Collection Fund is above target having recovered from several backdated refunds due to reductions in Rateable Value; most notably in respect of a £2m refund for Felixstowe Dock. The total RV has increased by £1.4m since April and £1.85m in arrears have been collected.

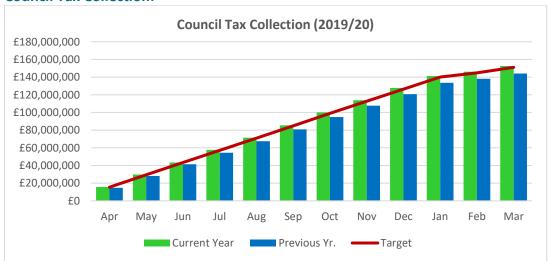
(Chart shows amount of money required to be collected within the financial year, payable to the NNDR Collection Fund against the actual collection).

#### **Council Tax**



For illustrative purposes, this chart shows distribution of Council tax income. Actual increases or decreases in income compared to estimates will be reflected as surpluses or deficits in future years.

#### **Council Tax Collection:**

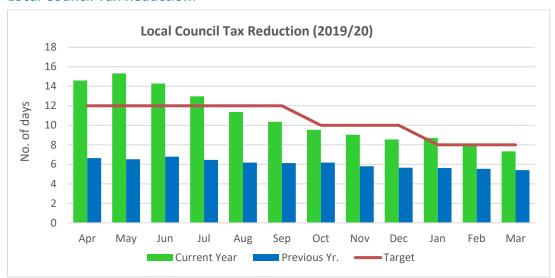


Above shows the amount of money required to be collected within the financial year for Council Tax.

### Quarter 4/End of Year:

As the tax base grows the net debit increases which should result in additional revenues being paid into the collection fund providing additional resources into the council's budget. The Net Collectable Debit started the year at £153,888,900.90 and ended the year at £153,991,451.63 giving an increase of £102,550.73

#### **Local Council Tax Reduction:**

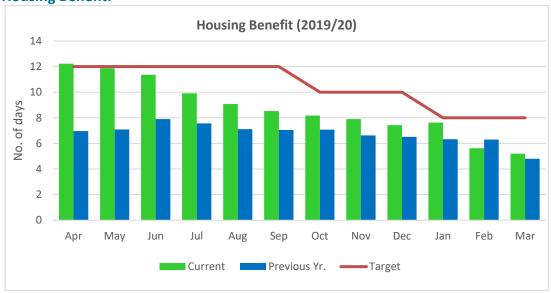


### **Quarter 4/End of Year:**

End of year performance was successfully achieved despite the downtime associated with the merger of East Suffolk systems impacted performance in the first quarter.

Above indicator measures the average number of days to process Council Tax reduction new claims and change of circumstances.

#### **Housing Benefit:**



#### Quarter 4/End of Year:

Despite the downtime associated with the merger of the East Suffolk systems the year-end target was successfully achieved.

Above indicator measures the average number of days to process Housing Benefit new claims and change of circumstances.

### 7. Corporate Risks

A detailed review of the corporate risks is undertaken quarterly by Corporate Management Team at Corporate Governance Days, and Corporate Risk Management Group is held every six months to manage, monitor and consider risks including the management of the risk process. All corporate risks, significant for the Council, are reported to Audit and Governance Committee, high level details are:

Corporate Risk	Current rating	Target rating	Trend	Update
(New): Covid-19	Red	Amber	n/a	Impact from this global pandemic is significant to the entire country. The Council is undertaking considerable work to help the most vulnerable, residents, communities and businesses.
Coastal erosion	Amber	Amber	<b>→</b>	Work is ongoing to try to protect properties from coastal erosion and support residents.
ICT (including Disaster Recovery for ICT)	Amber	Amber	<b>→</b>	Action plans in place to continue to improve mitigation for cyber threats/risks. Risk at target rate.
Medium Term Overview	Amber	Green	<b>→</b>	Continues to reflect uncertainty around national Government initiatives and potential impact. Medium Term Financial Strategy in place.
Assets to assist Council meet financial requirements	Amber	Green	<b>↑</b>	East Suffolk Asset Management Strategy in place and approved by Cabinet. Asset management review completed. All assets inspected, electronically recorded and uploaded to Uniform system, this forms single database for Council's assets.
Escalating cost of waste collection/ services	Amber	Green	<b>→</b>	Recycling significantly rising, increase in staff costs, disposal of material increasing will impact on ESC. Partnership working with other local authorities and Suffolk Waste Partnership.
Digital Transformational Services	Amber	Green	<b>↑</b>	Digital Services Strategy monitored. Projects reviewed to ensure compliance with Digital Strategy.
Housing Development Programme	Amber	Green	<b>↑</b>	Policies/protocols in place, updated/reviewed regularly. Housing Programme Board held to monitor developments and manage impacts.
Safeguarding the vulnerable	Amber	Green	<b>→</b>	Safeguarding Policy in place. Training for councillors and staff on safeguarding adults and children, established reporting process. Partnership working with other local authorities and agencies to address possible gaps and incorporate preventative measures.
General Data Protection Regulation	Amber	Green	<b>↑</b>	Risk improved as a result of implementing various controls but remained amber due to implications if legislation breached. Controls include compliance with DPA 1998, GDPR project, Data Protection Officer member of local and national GDPR working groups.
Brexit	Amber	Green	<b>→</b>	A countywide Brexit group had been set-up (ESC is represented). Still some uncertainty on consequences of Brexit and awaiting to see outcome of trade deal in December 2020.
East Suffolk Commercial Partnerships	Amber	Green	<b>↑</b>	East Suffolk Commercial Strategy in place. Risks to be reviewed and monitored. Initial business case presented to Cabinet.

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Corporate Risk	Current rating	Target rating	Trend	Update
St Peter's Court Tower Block, Lowestoft	Amber	Green	<b>↑</b>	Risk relates to possible fire risk to exterior cladding at tower block. Statutory guidance and regulations are in place. Liaison undertaken between local authorities and partners, including Fire Authority to ensure aligned approach to evacuation procedures and compliance with legislation. Annual external fire engineer risk assessment undertaken and acted upon.
Effective management of Key Contracts/ Partnerships	Amber	Green	<b>→</b>	Contract Procedure Rules and compliance with contract regulation. Compliance with Financial Procedure Rules. Review of existing significant contracts prior to termination. Implementation of exit clauses.
Service Delivery Contracts / Partnerships (large/significant)	Amber	Green	<b>→</b>	Regular review of Contract Procedure Rules ensuring alignment with business priorities and legislation. Partnership performance included within Internal Audit programme.
Service Delivery Contracts / Partnerships ('other')	Green	Green	<b>→</b>	Contract management guidance reviewed/updated.
Flood /tidal surges	Green	Green	<b>→</b>	ESC has a large coastline and flooding continues to be a risk and for ESC and nationally.  Emergency planning framework in place to deal with major incidents, including evacuation plans.
Flood /tidal surges (Lowestoft)	Amber	Green	<b>→</b>	Temporary barrier in place for Lowestoft. Partnership working is underway to obtain funds for a permanent tidal barrier in Lowestoft.
Programme and Project Delivery	Green	Green	<b>→</b>	Corporate project management framework in place. Alignment to governance arrangements to deliver new East Suffolk Strategic Plan.
Impact of managed migration of Universal Credit	Green	Green	<b>↑</b>	UC rollout complete (i.e. full digital service). Managed migration for UC taking place. Current controls and mitigating actions in place to assist with managing impact and helping residents.
Ethical Standards (maintain and promote)	Green	Green 1		Protocols and Codes of Conduct kept under constant review.
East Suffolk Strategic Plan	Green	Green	<b>^</b>	New East Suffolk Strategic Plan approved by Full Council in February 2020 for implementation on 1 <sup>st</sup> April 2020. New reporting framework established including Strategic Plan Delivery Board.
Capital Programme	Green	Green	<b>^</b>	Capital programme in place. Controls and mitigating actions in place.

## Appendix A

### **National and LG Inform Performance Indicators**

National & LG Inform Performance Indicators	Performance Indicator detail	Current status (for Q4)	Q1 2019/20 Target	Q1 2019/20 Actual	Q2 2019/20 Target	Q2 2019/20 Actual	Q3 2019/20 Target	Q3 19/20 Actual	Q4 2019/20 Target	Q4 19/20 Actual	Yearly Target	End of Year Actual	End of Year projection	Update/comment on quarters performance
Planning Major planning applications determined	Percentage of major planning applications deter-mined in 13 weeks	<b>©</b> Green	Target: 60.00% (Stretched Target: 65.00%)	100% (13/13)	Target: 60.00% (Stretched Target: 65.00%)	78% (18/23)	Target: 60.00% (Stretched Target: 65.00%)	84% (16/19)	Target: 60.00% (Stretched Target: 65.00%)	100% 13/13	Target: 60.00% (Stretched Target: 65.00%)	88.2% (60/68)	Above target	Performance for the determination of major planning applications within year remained consistently high exceeding national and locally stretched targets.
Minor planning applications determined	Number of minor planning applications determined in 8 weeks	⊕ Green	Target: 65.00% (Stretched Target: 75.00%)	67% (104/154)	Target: 65.00% (Stretched Target: 75.00%)	80% (127/ 159)	Target: 65.00% (Stretched Target: 75.00%)	74% (92/125)	Target: 65.00% (Stretched Target: 75.00%)	80% (107/133)	Target: 65.00% (Stretched Target: 75.00%)	75.3% (430/571)	Above target	Performance in minor planning applications remained high with performance exceeding both nationally and locally stretched targets.
Other planning applications determined	Percentage of other planning applications determined in 8 weeks	<b>☺</b> Green	Target: 80.00% (Stretched Target: 90.00%)	85% (437/516)	Target: 80.00% (Stretched Target: 90.00%)	90% (350/ 387)	Target: 80.00% (Stretched Target: 90.00%)	91% (339/ 374)	Target: 80.00% (Stretched Target: 90.00%)	82% (309/375)	Target: 80.00% (Stretched Target: 90.00%)	86.8% (1435/1652)	Above target	The performance in other applications is high, exceeding the nationally set targets but is slightly below the locally set targets.
Number of applicants in temporary accommodation	The number of applicants in TA at the end of each quarter. (Snapshot at end of each of quarter)	n/a	n/a	57	n/a	66	n/a	53	n/a	51	n/a	227	n/a	Numbers in TA have reduced and stabilised as a result of the following: Prevention Work Focussed TA meeting which allow the creation of bespoke move on plans. This work has continued into the final quarter of the year.

								· ·						
National & LG Inform Performance Indicators Customers	Performance Indicator detail	Current status (for Q4)	Q1 2019/20 Target	Q1 2019/20 Actual	Q2 2019/20 Target	Q2 2019/20 Actual	Q3 2019/20 Target	Q3 2019/20 Actual	Q4 2019/20 Target	Q4 2019/20 Actual	Yearly Target	End of Year Actual	End of Year Projection	Update/comment on quarters performance
		1 1		l	l	l			I			l	ı	
Complaints	Complaints upheld / partially upheld (per 10,000 population)	n/a	n/a	14.01	n/a	10.49	n/a	6.64	n/a	5.87%	n/a	37.02%	On target	Training to be delivered to managers/team leaders on identifying complaints which will assist with improving customer satisfaction in future. This is delayed due to current working restrictions and will happen following a return to business as usual.  Note: The Local Government & Social Care Ombudsman does not use "number of complaints" as a performance indicator.
Green Enviro	nment												,	
Household waste sent for reuse, recycling and composting (NI 192)	Percentage of household waste sent for reuse, recycling and composting	Unavailable	46.62%	48.37%	46.72%	47.06%	45.15%	<b>44.54%</b> (Estimated)	39.72%	Unavailable	44.62%	tbc	tbc	Due to the impact of Covid-19 monthly and quarterly operational reporting has been suspended but will be collated retrospectively when business as usual resumes.

National & LG Inform Performance Indicators	Performance Indicator detail	Current status (for Q4)	Q1 2019/20 Target	Q1 2019/20 Actual	Q2 2019/20 Target	Q2 2019/20 Actual	Q3 2019/20 Target	Q3 2019/20 Actual	Q4 2019/20 Target	Q4 2019/20 Actual	Yearly Target	End of Year Actual	End of Year Projection	Update/comment on quarters performance
Residual waste per household	Kg of waste per household	Unavailable	122.17kg	115.12kg	111.85kg	115.93kg	111.85kg	111.63kg (Estimated)	114.83kg	Unavailable	460.29kg	tbc	tbc	Due to the impact of Covid-19 monthly and quarterly
Fly tips reported	Number of reported fly tipping incidents per quarter	n/a	n/a	380	n/a	363	n/a	346	n/a	Unavailable	n/a	tbc	n/a	operational reporting has been suspended but will be collated retrospectively
Fly tipping enforcement notices	Number of fly tipping enforcement actions	n/a	n/a	141	n/a	137	n/a	137	n/a	Unavailable	n/a	tbc	n/a	when business as usual resumes.
Resources	'													
Website visitors	Number of unique website visitors	n/a	n/a	133,332	n/a	102,488	n/a	102,480	n/a	136,032	n/a	474,332	Above target	The number of unique website users in Quarter 4 was higher compared to previous quarters.
ICT Network Availability	Percentage of ICT network availability	<b>©</b> Green	98%	99.7%	98%	99.5%	98%	99.4%	98%	99.5%	98%	99.5%	Above target	ICT network availability exceeded its target throughout the year, particularly excellent performance due to the many changes that took place with the introduction of ESC.

National & LG Inform Performance Indicators	Performance Indicator detail	Current status (for Q4)	Q1 2019/20 Target	Q1 2019/20 Actual	Q2 2019/20 Target	Q2 2019/20 Actual	Q3 2019/20 Target	Q3 2019/20 Actual	Q4 2019/20 Target	Q4 2019/20 Actual	Yearly Target	End of Year Actual	End of Year Projection	Update/comment on quarters performance
Sickness absence	Number of days/shifts lost due to sickness absence per FTE	<b>©</b> Green	1.7 days	1.43 days	1.7 days	1.27 days	1.7 days	1.78 days	1.7 days	1.18 days	6.8 days	6.72 days	On target	2019/20 sickness figure was slightly under target, at 6.72 days per FTE. This is an increase on 2018/19 figures but is still below the national average for Public Sector employees. Quarter 1 figures have been revised and show a large increase on those previously reported — attributed to system changes in HR following the creation of East Suffolk Council. Long term absence represents the largest proportion of absence, 73% of all time lost (compared to 70% in 2018/19).



#### **CABINET**

Wednesday 6 May 2020

# ACKNOWLEDGEMENT OF THE DECLARATION OF CLIMATE CHANGE AND IMPACT ON HOUSING

#### **EXECUTIVE SUMMARY**

- On 22nd January 2020, at Full Council, a Notice of Motion (the Motion), received from Cllr Gooch, was included on the agenda for the meeting. The Motion was asking the Council to consider how it might seek to achieve the highest standards of energy efficiency and carbon neutrality in new residential developments in the district and in the Council's own housing stock. The exact wording of the Motion is set out, below.
- 2. Council Procedure Rule (CPR) 11.5 provides that Motions may be discussed immediately by the Council, with the consent of the Council shown by a majority vote. When a vote was taken to obtain the consent of the Council to discuss the Motion immediately, it was not carried. Therefore, in accordance with CPR 11.5, the Motion was automatically referred to Cabinet "for investigation and/or debate and further report back for subsequent debate to Council".
- The issues raised by the Motion were complex and warranted further investigation, in order to be fully and meaningfully debated. This report provides a response to the Motion and set outs some essential background information on the topic. It sets out what the Council has achieved, to date, and what its approach has been to minimise the environmental impacts where it can, through new build, and within the existing housing stock.
- Additionally, it includes a recommendation to Cabinet to consider appointing a specialist consultant, subject to budgets, to develop a schedule for retrofitting the Council's existing housing stock to a higher sustainable standard.

Is the report Open or Exempt?	Open
Wards Affected:	All

Cabinet Member:	Cllr Richard Kerry, Cabinet Member with responsibility for Housing						
Supporting Officer:	Cairistine Foster-Cannan						
	Head of Housing						

#### 1 INTRODUCTION

- 1.1 At a meeting of the Full Council on 22 January 2020, the Motion was included on the agenda. It proposed that:
  - 1. all new council houses will be built carbon-neutral, for example by future proofing with low carbon heating and the highest standards of energy efficiency.
  - 2. all developers of new affordable housing should be encouraged to meet these same high standards.
  - 3. all other developers of new housing should be encouraged to meet these same high standards.
  - 4. all existing council stock, and properties purchased for such use, should be retrofitted to the highest standards as economically as possible.
- 1.2 At Full Council, consent to discuss the Motion that evening was not forthcoming. Instead, in accordance with CPR 11.5, the Motion was automatically referred to Cabinet for investigation and/or debate "and further report back for subsequent debate by the Council". This report sets out the results of the investigations which have been carried out into what the Motion proposed. The results of these investigations will provide the detail and background to this complex subject, which would not otherwise have been available to Council, on 22.1.20. It will enable Members to carefully consider the Motion and the recommendations which are proposed, as a result.

#### 1.3 This report considers:

- the environmental achievements to date, and the significant investments made in the Council's housing stock to address energy efficiency and carbon reduction.
- the existing ambitions for sustainability, set out in our recently approved Housing Development Strategy.
- the Council's encouragement of developers to provide high standards of energy efficiency in new developments in the district.
- how we can seek to build on our environmental achievements to date, by considering new options to reduce the carbon impact of housing.
- the financial implications of the above

#### 2 ENVIRONMENTAL ACHIEVEMENTS TO DATE

2.1 The Council currently owns 4, 444 properties which are located predominantly in the north of the district. Within the housing stock, there is a turnover of approximately 300 properties (voids) each year. This is set against a housing waiting list for social housing

- (Council and Registered Provider) of around 4, 000 households, demonstrating that demand for homes significantly exceeds supply.
- 2.2 A proactive housebuilding programme has been adopted by the Council with 8 new properties being completed in 2018 and 54 in 2019. We have a target of building over 1,700 new homes over the life of the 30-year Housing Revenue Account (HRA) Business Plan (the Business Plan) with a projected budget of £227m to achieve this. The Business Plan acknowledges that this is a challenging aspiration. Projections for new build in the coming 2-3 years are likely to be lower than the target, due to the lack of small sites to develop and the limited capacity in the Council to dedicate to this activity, although it is acknowledged and anticipated that the recent recruitment of staff in the Housing team should assist in this regard, to some degree.
- 2.3 With regard to the Council's own housing stock, historically, investment has been made to improve the energy efficiency of properties for the benefit of our tenants, primarily to reduce fuel poverty. This long-term investment has taken place over the last 30 years, with the Council at the forefront of energy efficiency improvements in social housing in the region, as well as achieving the Decent Homes Standard some two years ahead of the Government requirement.
- 2.4 The energy efficiency programmes delivered previously across all the Council's stock included cavity wall insulation and external cladding, full double glazing, installation of combination and condensing boilers, enhanced loft insulation and installation of thermostatic radiator valves on every wet system radiator.
- 2.5 In recent years, the Council has adopted more advanced technology for carbon-reducing improvements to the housing stock which have been to the benefit of both the environment and our tenants. These include the installation of solar photovoltaic panels across a range of housing, air-source heat pumps in predominantly rural areas and a biofuel heating system at a retired living scheme. We continue to look to extend the opportunities to use these methods, and other new technologies, in our housing stock to benefit tenants and the environment.
- 2.6 The collective success of this historical investment in the Council's housing stock is evidenced with a significant Standard Assessment Procedure (SAP) energy rating average for our housing of 70.52 (band C). This compares very favourably to the national social housing average of 67 (band D) and a privately owned housing average of 61 (band D). The excellent achievement of this high SAP banding should be seen in the context of a generally ageing housing stock (excepting the recent new builds) which dates predominantly from the inter-war years to the mid-1980s, making the delivery of energy efficient homes a considerable success. The Council is continually seeking to improve the SAP energy rating, but this inevitably becomes increasingly more challenging and expensive following the improvements which have already been carried out or continue to be rolled out.
- 2.7 Current data on the relatively new air-source heat pumps installed in 252 homes suggests that we have a achieved a significant 10-point increase on the SAP rating for these homes. This amounts to an estimated saving of 616 tonnes of CO<sub>2</sub> emissions, demonstrating the potential impact our changes can make to the environment. It is planned that this investment will continue to reduce the housing stock's overall carbon footprint.
- 2.8 The Council has also installed solar PV panels on 238 properties and has collected £634,000 to date through the Government's Renewable Heat Incentive (being the largest

allocation of all the English district councils) that is wholly re-invested by the Council in green housing initiatives in our housing stock.

#### 3 HOUSING DEVELOPMENT STRATEGY AND SUSTAINABILITY

- 3.1 Cabinet recently approved the Housing Development Strategy 2020-2024 (the Strategy). Report ES 0240 which was presented to Cabinet on January 2020 refers. The Strategy very clearly sets out the Council's environmental ambitions for its housing stock, and Members are reminded of it, as it has addressed some of the issues raised by the Motion. Members are referred to the section of the Strategy about sustainability. The Strategy explicitly states that the Council will explore the use of greener building technologies and examines innovative design ideas which recognise the benefit of Passive House principles, and the value of carbon neutral design. Passive House is a European recognised design standard that relates to a building in which thermal comfort can be achieved solely by post-heating or post-cooling the fresh air flow required for a good indoor air quality, without the need for additional recirculation of air.
- 3.2 The Strategy goes on to state that "the challenge of climate change means measures to minimise carbon emissions, promote renewable energy and manage water effectively should be an integral part of design solutions. We seek to improve energy efficiency and meet current modern standards and provide new homes that meet these standards where it is feasible to do so within the constraints of site layout, orientation and financial viability".
- 3.3 The feasibility of adopting a carbon neutral approach to new build Council housing will need to be considered alongside other competing demands including:
  - An ever-increasing demand for housing to meet the needs of the community
  - The financial viability of individual carbon-neutral schemes
  - The available funding within approved allocated budgets
  - The 'opportunity cost' of building homes (e.g. the impact on the environment balanced against the need for affordable and sustainable housing)
- 3.4 Cabinet will be presented with a Housing Enabling Strategy (HES) in May to compliment the Strategy in encouraging the delivery of more sustainable homes in the district. The HES outlines the measures taken by the Council to encourage sustainable development across the whole of the housing sector.
- 3.5 The HES also references the Council's current commitment to the Environmental Guidance Note written by the Council's own Environmental Task Group. This Guidance Note gives advice to developers on new build and retrofit development. This document will dovetail with the HES and the Strategy to ensure that sustainability issues are given proper consideration.

#### 4 WHAT HAS BEEN/CAN BE DONE TO ENCOURAGE PRIVATE DEVELOPERS

- 4.1 The regulatory requirements for the energy efficiency of new houses are stipulated within Building Regulations, the contents of which are not within the control of the Council. However, Local Planning Authorities can set energy performance standards for new housing that are higher than the building regulations (up to approximately 20% above current Building Regulations). Local requirements must also be based on robust evidence and consider the impact on the viability of development.
- 4.2 The Government consulted recently on increasing energy efficiency for new homes in 2020 and requiring new homes to be 'future-proofed' with low carbon heating and energy efficiency by 2025. The outcome o₹€¼is consultation is not yet known and would

apply to both the Affordable and Market housing sectors. The Council's Local Development Plans, for development control, do not differentiate between either for sustainable construction.

- 4.3 Both of the Council's Local Development Plans contain policies to support sustainable development and contribute towards the mitigation of climate change and reducing energy use. Both contain sections on climate change which set out a range of possible options including examples of Sustainable Construction and increased water efficiency.
- 4.4 The Council will shortly consider an Environmental Guidance Note which is aimed at encouraging developers to raise standards and recommends a range of possible environmental measures that could be used in developments. The document is intended to provide a clear, consistent message from the Council on environmental issues relating to development and is acknowledged in the draft HES.

#### 5 NEW OPTIONS TO FURTHER REDUCE OUR CARBON IMPACT

5.1 Average new build costs in relation to Passive House - The Council has built or acquired a total of 80 properties since 2015/16. The average cost to purchase these properties (including professional fees, development fees, associated revenue costs, as well as the actual construction cost where applicable) was £120,559. A recent meeting with Norwich City Council on their exemplar Passive House development, 'Goldsmith Street', showed that the average cost of build per property was approximately £164,800. (£44,241 more than our current average property cost). The site, consisting of 105 properties, was HRA-owned land and, therefore, did not include any significant land purchase costs. If this Council needed to purchase a site of this size to bring forward a development, it would add a significant sum to the overall cost of the scheme, which would substantially push up the average cost per property and increase the payback period.

- 5.2 When the Norwich development was built, it had an average build cost of £2,200 per m<sub>2</sub>. The estimate today is £2,500 per m<sub>2</sub>. This would push the average build cost up to £187,300 per unit (without land costs) in an equivalent large city development. In a smaller scale development in this area, it could amount to over £200,000 per property (an increase of £80,000 per property on the average new build in East Suffolk, or 66%). Using this as an example, we could reasonably assume, for the same amount of money, we could deliver 30 new Passive Houses compared to 50 standard properties.
- 5.3 Extent of planning and project managing On average with a standard development, it takes approximately 2 2.5 years to build out a site from initial identification to completion. However, the Goldsmith Street development took 11 years to reach completion. It is recognised that these types of developments, because of their technical specifications, cannot be built-out quickly. The adoption of a strictly Passive House or Carbon Neutral approach to new homes will require a change in focus, which will impact, inevitably, on the projected delivery of housing, in terms of numbers and time.
  - Differences between a Passive House and a carbon neutral property It should be noted that there is a difference between Passive House properties and carbon neutral properties.

    Broadly speaking, a Passive House would result in reduced energy costs for tenants. This is because the construction principles are to set to achieve very high levels of insulation, with extremely high performance windows with insulated frames, airtight building fabric, "thermal bridge free" construction, and a mechanical ventilation system with highly efficient heat recovery. Passive House is an accreditation of the properties can include 'passive'.

principles' without meeting the high Passive House standard for full certification. There is a cost associated with obtaining the certification which again will impact on the overall cost. A carbon neutral property uses fabric energy efficiency standards based on space heating and cooling, energy efficient heating and cooling technologies, e.g. solar panels, and "allowable offsite solutions" — a form of carbon offsetting. The main distinction is that costs for tenants in carbon neutral properties (but not Passive House properties) may be greater than current costs due in part to the cost of gas, compared to electricity, and in part due to the occupier's understanding how to use the technology correctly.

- Council stock differences When considering the retrofitting of the current housing stock, unfortunately, there are some practical restrictions which mean that not all properties will be able to benefit:
  - Solar panels on roofing Not all roofing on the Council's housing stock receives enough sunlight or is of the right size/shape/framework. Consideration needs to be given, for example, to the government initiatives available, the implications of Right to Buy on the costs of the panels which have been bought, and the need for re-roofing works etc.
  - Conservation areas and listed buildings may not allow thermal improvements such as PVC windows or doors or solar panels.
  - Air-Source heat pumps may not be able to be installed in all of the stock due to physical limitations.
- Period of Retro-fitting It is anticipated that retro-fitting void (empty) stock will take a
  considerable period of time and significantly impact on the turnover of stock (and our
  ability to house people), as well as the impact on lost rental income. Additionally, the
  costs of the improvements may be such that the future viability of the property for the
  Council is questionable. More details on retrofitting on the housing stock will become
  available following feedback from a consultant (detailed below 6.2)

#### 6 PATHWAYS TO CARBON NEUTRALITY

- 6.1 Officers have already initiated a variety of investigations to move the Council closer to a far more sustainable position, mindful of the commitments in the Strategy. Following these investigations, possible options will be outlined to Cabinet with associated cost and programme implications for consideration.
- 6.2 A specialist Passive House Designer with experience of retro-fit has been consulted recently by the Housing Team to establish the viability of undertaking retro-fit work across our housing stock to EnerPhit standards (a retrofit standard supported by the Passive House Institute). The advice is that "there are three obvious paths to Carbon Neutral:
  - 1. Build new properties and dispose of the Council's worst performing homes.
  - Partially renovate many homes per year and ensure that each renovation is complimentary to the last
  - 3. Fully renovate 150+ homes per year to an agreed specification that will achieve the goals of "carbon neutral".

"With so many house types of differing ages, there may be a requirement to incorporate a blend of all three paths. In terms of moving forward, we would suggest that our strategy would encompass the following:

1. Review properties by house type / age / condition, ascertaining which "path" (options) should apply to each unit / type. 263

- 2. Cost those improvement options to determine which should be attempted, and in which order, to each unit / type.
- 3. Highlight accreditations / schemes achievable i.e.
  - a. New Build: Passivhaus or AECB Gold Standard or Future Homes Standard.
  - b. Renovation: EnerPhit or Energiesprong or PAS2035 / PAS2030.
- 4. Select two / three house types and attempt to cost the differing renovation standards, highlighting the likely:
  - a. performance; and,
  - b. resultant householder bills; and,
  - c. reduced maintenance, as appropriate.
- 5. Strategise, in conjunction with yourselves, a realistic programme linked to capital expenditure for each year, excluding inflation etc."
- 6.3 In light of the advice from the consultant, Officers will consider the costs involved with the programme, tenant disruption, and the overall value for money of any proposed changes. Officers will utilise the expertise of the consultant to formulate a long-term programme for our current housing stock.
- 6.4 The development of a 'green standard' specification for new build is being researched by the Housing Team Officers with the aspiration of migrating our standard specification to the new green specification over the next few years. A draft version will be available in the early summer. To assist with Members understanding, it is intended that there will be 3 specifications for comparison, together with the associated costs of each (both build and running). This should provide the detail necessary for Members to make an informed decision about the specification which will be proposed, which are:
- 'top of the range' adopted by high end house builders with less financial constraints and desire to be as environmentally friendly as possible.
- 'standard house builder' predominantly profit driven with minimal regard for sustainable design or construction.
- 'affordable sustainability' this is what we will suggest for adoption, based on a balanced view of cost, impact and return.
  - It is proposed that the new specification would be reviewed and adopted by the Council, following a trial project to assess costs, construction time, suitability and the cost effectiveness to tenants.
- 6.5 We are also investigating alternative construction methods, such as modular housing. This claims to deliver carbon neutral housing, as well as flexible and expedited construction. A recent visit by Members to a building site that was utilising factory-built modular housing (<a href="https://www.projectetopia.com/">https://www.projectetopia.com/</a>) has brought back useful information on this form of construction. It would be envisaged that the 'green standard' specification, discussed above, would be used to ensure that this form of housing met our standards and would be competitive during a procurement exercise.

#### 7 HOW DOES THIS RELATE TO THE EAST SUFFOLK STRATEGIC PLAN?

7.1 The discussion of the development of a carbon neutral approach to housing sits within one of the five key themes, Caring for our Environment

#### 8 FINANCIAL AND GOVERNANCE IMPLICATIONS

8.1 The impact of adopting a carbon neutral position for new housing and retrofitting of the existing Council housing stock is recognised and considered to be important in light of the

Council's declaration of a climate emergency. However, there are significant cost associated with the adoption of the approach advocated in the Motion.

The Business Plan identifies, within the 30-year capital programme funding on major works on existing stock of £83.8m, a redevelopment budget/plan of £55.9m, and new developments of £227.3m. The new homes programme is funded mainly from The Council's reserves and contributions. Without increasing the Council's borrowing level, the budgets identified above are agreed until 2048. This funding has been allocated already to maintaining our existing stock and deliver our target of 50 new homes a year. The funding of additional standards, such as achieving a carbon neutral housing stock, may result in a reduction in the proposed development programme, if additional borrowing is to be avoided.

- 8.2 Currently, the HRA has borrowing of £71.2m with £10.76m to be repaid in 2020/21, reducing the debt to £60.4m. Though there is no longer a borrowing cap, borrowing needs to remain affordable. The previous cap provided a good guide to continue to fund the day to day running costs while servicing the debt. On this basis, using the old borrowing cap of £87.2m as a guide, from 2020/21, the HRA could look to borrow an additional £26m. This would cost the HRA £10.2m in interest over the 30-year life of the borrowing, together with paying the principle debt.
- 8.3 Additional borrowing for retrofitting or improving the current housing stock further would not generate any additional income to offset against the interest paid, putting the HRA in a worse financial position, and reducing new build opportunities in the long term.
- 8.4 The HRA supports investment in initiatives to reduce carbon emissions, and also needs to ensure that expenditure is affordable and manageable over the 30-year HRA business model.

#### 9 REASON FOR RECOMMENDATION

- 9.1 This report responds to the propositions in the Motion that
  - 1. all new council houses will be built carbon-neutral, for example by future proofing with low carbon heating and the highest standards of energy efficiency.
  - 2. all developers of new affordable housing should be encouraged to meet these same high standards.
  - 3. all other developers of new housing should be encouraged to meet these same high standards.
  - 4. all existing council stock, and properties purchased for such use, should be retrofitted to the highest standards as economically as possible.
- 9.2 It investigates the propositions so that Cabinet may debate them and further report back for subsequent debate to the Council, in accordance with CPR 11.5.
- 9.3 Therefore, the report sets out the considerable investment, and achievements, to date, to reduce the carbon impact of the Council's housing stock. It sets out how the Council's recently adopted Housing Development Strategy aims to promote sustainability, and to meet the Council's environmental ambitions. It explains what we have done to encourage private developers to do likewise. Finally, it sets out the Council's realistic intentions, going forward, to further our environmental aims, to meet the challenges of

- our climate change agenda, and crucially, to find a pathway to carbon neutrality for our housing stock.
- 9.4 To meet this latter ambition, the report recommends, additionally, that a consultant be appointed to look at developing a future programme of work for the retrofitting of the existing housing stock.

#### **RECOMMENDATIONS**

- 1. That Cabinet considers Cllr Gooch's motion of 22.1.20 which is referred to in the report, above, together with this investigatory report, what the Council has done to reduce the carbon impact of its housing stock and what it intends to do, in future, to build on its successes to date.
- 2. That this report, together with comments from Cabinet, form the basis of a further report back for subsequent debate by Council, in accordance with Council Procedure Rule 11.5.
- 3. That notwithstanding any subsequent debate in Council, Cabinet continues the work to limit the carbon impact of its housing stock by giving delegated authority to the Head of Housing, acting in consultation with Member for Housing, to consider appointing a specialist consultant, subject to budgets, to develop a schedule that will provide a realistic pathway to carbon neutrality for the Council's existing housing stock, subject to compliance with the Council's Contract Procedure Rules.