

Lowestoft Local Neighbourhood Development Plan

Submission on behalf of *Use Your Voice Lowestoft*

1. Introduction

Use Your Voice Lowestoft is a community group formed in 2023 to raise awareness about the impacts of climate change on the future survival and prosperity of our town. We recognise the importance of the Lowestoft Local Neighbourhood Development Plan and the opportunity it provides to set out a long-term vision with the legal weight of a statutory development plan.

We welcome all the positive aspects of the current LNDP but it is our conviction that the plan does not go far enough and that its priorities need to be re-ordered to recognise the importance of climate change impacts. Our LNDP has the potential to be a truly ambitious plan that would put Lowestoft at the forefront of planning for better and more sustainable communities nationally; and since the town is at the forefront of the consequences of climate change, that seems wholly appropriate. We recognise that the climate science is evolving rapidly but overall, we do not believe that the current draft neighbourhood plan provides a clear narrative about the scale of the threats from sea level rise and storm surge and the consequences of those threats for the social and economic development of our town.

As a result, the group wishes to **formally object** to the plan in its current form. We would very much welcome a close engagement with the town council to ensure that the final plan reflects a realistic appreciation of the climate impacts and a clear strategy to both positively address those threats and to utilise the challenge they present to create a transformed living environment for the people of Lowestoft.

2. Ensuring the Lowestoft neighbourhood plan fully reflects the predicted impacts of climate change.

The next five years will define whether Lowestoft is set on the right pathway for its long-term survival. To make Lowestoft a decent place to live, a viable place to invest, and a place with a definite future, the LNDP has to put Climate Change front and centre. That is primarily because our economic sustainability - and in particular the availability of affordable commercial insurance and mortgages - depends entirely on the ability of the town to demonstrate a long-term strategy to build climate resilience.

Climate change is the greatest challenge facing our society. Every decision we take must count towards securing our long-term survival. The science of climate change is now well understood, and we know that we must limit the global temperature increase to 1.5°C above pre-industrial levels if we are to avoid catastrophic climate impacts. A recent report from the IPCC (Intergovernmental Panel on Climate Change)¹ made clear that drastic action to reduce carbon emissions is needed now if we are to have any hope of achieving that target. But we know that severe climate impacts are already locked in even if we succeed in limiting the temperature rise to 1.5°C. Sea level rise is one of the locked-in factors. These impacts require the urgent re-design of our community to make it safe and liveable for future generations. For the Lowestoft LNDP that means adopting specific policies which:

- [Support 'radical' reductions in carbon emissions in line with the 2008 Climate Act as required by the National Planning Policy Framework paragraph 152 and footnote 53².
- [Support a range of resilience measures to deal with the 1.9 metres of sea level rise predicted under the H++ scenarios by 2100³. Measures must also be fit to deal with the increasing frequency and severity of storm surge, river flooding and rapidly increasing surface water flooding.

The LNDP must reflect the degree to which existing and planned flood defence measures meet the test in National Planning Guidance of making homes safe over their whole lifetime which means at least 100 years⁴. The plan must also show how it has considered the kinds of approaches to building resilience set out in the National Coastal Erosion and Risk Management Strategy⁵.

Every planning decision has to revolve around making it sustainable, not for a few years, but for 100 years. To this end, this Neighbourhood Plan must consider all aspects from the perspective that the actions we take now will influence the next hundred years, from education to flood defence to health. As a result, we believe the plan should be significantly restructured to prioritise climate change as the lens through which all other policies are delivered. In addition, the plan must include specific policies which can deliver on the requirement to reduce carbon emissions and build climate resilience.

1 [Climate Change 2021: The Physical Science Basis. Summary for Policymakers. Intergovernmental Panel on Climate Change, Aug. 2021 https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM.pdf](https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM.pdf)
2 [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/431212/National_Planning_Policy_Framework.pdf)
3 [Flood risk assessments: climate change allowances - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/431212/Flood_risk_assessments_climate_change_allowances_-_GOV.UK_(www.gov.uk).pdf)
4 [Flood risk and coastal change - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/431212/Flood_risk_and_coastal_change_-_GOV.UK_(www.gov.uk).pdf)
5 [Environment Agency – National Flood and Coastal Erosion Risk Management Strategy for England \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/431212/Environment_Agency_-_National_Flood_and_Coastal_Erosion_Risk_Management_Strategy_for_England_(publishing.service.gov.uk).pdf)

3. Specific policies for inclusion in the Lowestoft Neighbourhood Development Plan (LNDP).

- [The Lowestoft LNDP must have a clear policy to ensure that all new homes must be next zero and to achieve this the Passivhaus⁶ Housing standards should be adopted. We note that central Lincolnshire council has adopted such standards.
- [Affordable housing is a major problem in Lowestoft. Current local plan policy is for the provision of a proportion of 30% affordable homes; but since many of these housing products are not genuinely affordable the neighbourhood plan should require that all affordable homes in Lowestoft should be provided as social rent. The extra build cost of producing affordable *and* sustainable housing can be bridged by prioritising quality and sustainability over profit in agreements concerning development of council-owned land and other grants of planning permission.
- [New housing must be accompanied by sustainable urban drainage systems (GREEN SUDS) and by property level flood resilience measures⁷.
- [The LNDP should set out a green infrastructure strategy for our town which maps all of the green spaces and aims to increase green space by 10% over existing levels over the next five years. Neighbourhood plan policy should identify sites suitable for biodiversity enhancement and for local food growing.
- [All new homes in Lowestoft should be required to meet the National Space Standards⁸ and to be designed to meet lifetime home standards of accessibility.
- [All new development must be well connected to Sustainable transport infrastructure so that basic services such as shops and key social facilities are no more than a 15-minute walk.



⁶ [Passivhaus News \(passivhaustrust.org.uk\)](https://passivhaustrust.org.uk/)

⁷ [Building back better and mainstreaming property flood resilience - Creating a better place \(blog.gov.uk\)](https://blog.gov.uk/building-back-better-and-mainstreaming-property-flood-resilience-creating-a-better-place/)

⁸ <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard/technical-housing-standards-nationally-described-space-standard>