

From: [Marcelle Castle](#)
To: [Lake Lothing Third Crossing](#)
Cc: [Steven Bell](#); "jason.wells@richardduttingassociates.com"; [Joanna Clarke](#)
Subject: Lake Lothing Third River Crossing Nwes Representation
Date: 07 January 2019 16:00:41
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[Nwes Representation LLTRC.pdf](#)
Importance: High

Dear Sirs

Re: Application by Suffolk County Council for an Order granting Development Consent for the Lake Lothing Third Crossing

The following represents a summary only of our full written representations pursuant to Deadline 3 of the Examination Timetable.

We object strongly to the proposed development and consider that it will have a significant adverse effect on our site and business. As a result of our survey of our tenants (brief summary below) the business will likely not be sustainable in its current location and will close. It will result in job losses, relocation and potential closure of businesses, loss of services to businesses locally and impact on the wider Lowestoft community.

We have conducted a survey of our tenants. The results of which are as follows in response to the proposed development;

1. 50% said the development would have a highly negative impact on the site and their business.
2. 58% said that traffic resulting from the development will have a highly negative impact
3. 50% said that increased noise would have a highly negative effect
4. 50% said that access proposals will have a highly negative effect
5. 42% said reduced visibility will have a highly negative effect
6. There were concerns regarding parking and fumes

We are concerned that to date we do not consider there has been sufficient clear information available for us.

Kind regards,
Marcelle

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Monday 7th January 2019

Dear Sirs,

Re: Application by Suffolk County Council for an Order Granting Development Consent for the Lake Lothing Third Crossing

The following represents our written representations pursuant to Deadline 3 of the Examination Timetable.

Background and Ownership of Riverside Business Centre

Riverside Business Centre, located on the south bank of Lowestoft's inner harbour, offers professional office space designed to provide a stimulating environment for both start-up and established businesses. The Centre has 37 office units, ranging in size from 155sqft to 385sqft.

Modern and welcoming, each office is available with easy-in, easy-out tenancies, with free access to business advice, training, and finance sources via the Nwes Business Advisor network.

Our resident Nwes team are there to ensure the needs of tenants are met, including the provision of reception duties, post handling and all aspects of facilities management. A fully equipped conference room offers professional meeting and conferencing facilities.

Business support, advice, and training courses are provided from the Riverside Business Centre by qualified advisors who are able to advise on all areas relating to business start-up and growth.

With ample free onsite parking (62 spaces) and high-quality shared facilities, Riverside Business Centre currently makes an ideal home for local Lowestoft businesses looking to rent a flexible, fully managed workspace.

Riverside Business Centre was originally developed with funding from the former Regional Development Agency (EEDA) and European Objective 2 funding. The key strategies of these bodies were to direct funds promoting economic regeneration, social inclusion and employment opportunities into areas of social deprivation and high unemployment resulting from the decline in primary industries. Lowestoft is a prime example of this.

The site on which Riverside Business Centre is located was selected and acquired by EEDA as part of a larger site area in need of regeneration. EEDA sought to regenerate the site for employment uses and job and business creation. EEDA subsequently sold serviced plots to some of the local businesses which provide jobs at adjoining plots. Within this context Riverside Business Centre was specifically designed, funded and developed to provide the optimum environment and services to capture and support innovation and the creation and growth of start-up and small businesses.

The specific site and location of the Centre was selected as the 'prime site' with the highest visibility to provide a gateway position for a flagship facility which would act as the catalyst for the development of the surrounding employment area (NB: such a gateway position for facilities of this nature has proven to be key to the success for centres of this type and this has been crucial in the successes at Riverside Business Centre to date).

Riverside Business Centre provides an incubator facility to support new and existing businesses to achieve their growth potential. In doing so, the Riverside Business Centre has had a significant positive impact on the towns economic activity and been the catalyst for further investment and development in the area.

Since its opening in 2002, Riverside Business Centre has provided specialist support to in excess of 3,350 individuals / businesses employing in excess of 1,200 personnel in an area of economic deprivation.

Nwes purchased the Riverside Business Centre on the 22nd May 2009 and since then the Centre has been home to 139 tenant companies.

Average occupancy from the period May 2009 to date is 81%.

Business Model and Current Position

Nwes are a not for profit organisation. The nature of our business is providing support for small to medium enterprises through the provision of business advice, training, finance, and managed workspace. Whilst we need to ensure we are not running the property portfolio at a loss, our aims are not around commercial gain. Any profits generated from the property side of the business are reinvested to support enterprise activity.

There are restrictions on the overall use of Riverside Business Centre which mean that the facility cannot be reassigned to accommodate alternative uses which are not in line with Nwes's complimentary constitutional and strategic objectives. These considerations combine to the effect that Nwes cannot and would not wish to own and operate Riverside Business Centre in any alternative use or format other than in its specific existing use.

Reflecting upon the Centre's operational running costs for the past 3 years, Riverside Business Centre's current break-even point is 73% occupancy. Current occupancy on site is 77% with 6,960sqft occupied across 28 offices and 90 people employed on site.

Given the tight margin between break even and current actual occupancy, we have significant concerns around how the proposed Lake Lothing Third River Crossing scheme may impact on both the future sustainability of the Riverside Business Centre and the Centre's existing tenant businesses with the loss of all of corresponding job creation and economic development outputs and benefits which the Centre has very successfully delivered since its creation.

Questionnaire Responses and Results

Despite repeated requests we did not receive a link to the appropriate plans demonstrating how the proposed development would affect our site until 20th December 2018. We had been seeking those plans to be able to develop an understanding of the impacts of the proposals to Riverside Business Centre and its users, to inform our consultation with the Centre's existing tenants/users and to inform the development of our representation to the examination.

It's late availability resulted in us only being able to effectively consult with our tenants from that date. We immediately distributed a questionnaire to the current 20 tenant businesses

within the Centre, to determine how they anticipate the scheme will affect both their business and the Centre. We believe the late availability of that information has impacted on our ability to develop and present a full and detailed representation as we would have liked by the 8th January.

To date we have received 12 responses from the tenants. However, we are expecting to receive further responses shortly. Due to the deadline for making representation, we have used the 12 responses, which have been summarised as follows:

Q1. Do you believe the building of the third river crossing will have an adverse impact on your business?

Yes	No
4	8

Q2. Do you have any concerns over how the planned crossing will affect the Centre and your business?

	Impact (-5= highly negative, 0 = no effect, +5 = highly positive)										
	-5	-4	-3	-2	-1	0	1	2	3	4	5
Elevated roadway outside Centre	6			2		3					
Increased Traffic	7	1	1	2		1					
Increased Noise	6	1	1	2		2					
Reduced ease of access	6		2	1		3					
Reduced centre visibility	5			4		3					

Q3. If the third river crossing is developed as planned would you consider relocating your business?

Yes	No
5	7

Q4. If the third river crossing is developed as planned would you still be willing to pay the same level of rent for your unit?

Yes	No
5	6

The questionnaire gives tenants the opportunity to provide further detail and additional comment. These have been summarised under relevant headings below:

Proximity

50% of the respondents indicated that the elevated roadway will have a highly negative impact to both the Centre and their businesses. One tenant commented that it will be a “complete change in setting of our offices” and as a result, if the scheme proceeds as planned, they will not pay the same level of rent as “it makes the offices much less desirable which is a terrible shame.”

Traffic

58% of respondents fear a highly negative impact. One tenant commented “traffic is a big concern for us. If the staff have issues getting to us, then we will consider moving”, whilst another commented “major disruption to and from work and for our clients visiting us”.

Noise

50% of respondents indicate increased noise will have a highly negative impact. When asked whether they will be willing to pay the same level of rent if the scheme is developed as planned, one tenant who answered no, also commented “Increase in noise and traffic will reduce the value of the centre”.

Access

50% of the respondents indicate reduced ease of access will have a highly negative impact. One tenant commented “The anticipated road works and new infrastructure could only be seen as a negative and possibly damaging for our business. We would look to move”. An easy and clear access route (such as that which Riverside Business Centre currently enjoys) is key to the success of such business centres. The 3rd Crossing proposals identify a fundamental change to the existing vehicle access route to the effect that the current prime location / vehicular access route would be removed and replaced with a new route whereby the Centre would no longer be able to offer that prime position with easy access. Instead under the proposals the Centre will be accessed (from the construction phase of the 3rd crossing and ever after post completion) as the final destination at the end of circuitous new road which would first pass through various other landholdings and uses.

The proposed new route represents a considerable detour from the current arrangement in one of the most critical areas to the continued success of the Riverside Business Centre and its ongoing successful operation for tenants and other users (e.g. users of the conference facilities).

Visibility/Visual Impacts

42% of respondents fear reduced visibility will have a highly negative impact. The visibility of such a business centre is proven to be key to its success. From the proposal we have seen to date it is not possible to identify at all the extent of the visual impacts of the proposals on Riverside Business Centre, particularly when any sound protection measures and/or parapet wall which may be added to the elevated approach road to the crossing, which it appears is proposed to run directly adjacent to the existing successful business centre.

Car Parking

Although we did not ask questions specifically relating to car parking 30% of respondents commented on this issue. One commented “Access and parking are my biggest concern. I also hope noise and traffic will not be an issue”.

Fumes

There were no questions specifically relating to fumes however one tenant commented “Another issue with increased traffic at high level is exhaust fumes, especially at busy periods when traffic can be queuing. This will be particularly bad in Summer when we usually have our windows open”.

Whilst only 4 of the responses received indicate that the scheme will have an adverse impact on their business, it's evident from the feedback that the impact they perceive it having on the Riverside Business Centre itself is highly negative.

Conclusion

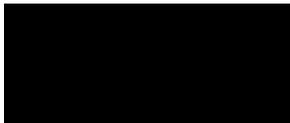
Based on current occupation and the findings so far from the questionnaires, if the 5 tenants who answered Yes to Q.3 took the decision to relocate their business as a result of the scheme going ahead, occupancy would drop to **62%**. This would result in the centre no longer be financially and operationally sustainable for Nwes' ongoing operation from the Riverside Business Centre location.

The combined impacts of the third crossing proposals noted above show how continued operation of the Riverside Business Centre would no longer be viable in its existing use with direct impacts to Nwes, to existing tenant companies and users and to the wider local economy. These impacts would include loss of business support and business development services and facilities from the Centre which have proven a major benefit and driver of economic growth in Lowestoft since 2002. It would also lead to a loss of jobs, job creation opportunities and to local business growth and expansion.

Closure of the Centre will be hugely disruptive not only to Nwes, but to the business community of the Riverside Business Centre and wider Lowestoft economy. It will result in the relocation or potential closure of the existing 20 tenant companies. Failure to find suitable alternative premises locally will impact on Lowestoft's economy as Riverside Business Centre's current tenant businesses may choose alternative premises outside of the Town. There will be loss of services locally to business advice recipients as well as to other users of the Centre – both virtual tenants and conference users. The potential for job losses is real as Nwes will have no option but to put its onsite personnel at risk of redundancy and those that provide sub contracted services to the building e.g. cleaning, security etc will no longer be required.

We are concerned that to date we do not consider there has been sufficient clear information available for us to consider how the development will affect the day to day operation of our business. This includes timelines for construction phases and alterations to traffic systems.

Yours faithfully,



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