NEIGHBOURHOOD AREA DESIGNATION CONSULTATION

OBJECTION TO LEISTON NEIGHBOURHOOD PLAN PROPOSED NEIGHBOURHOOD AREA

1.0 INTRODUCTION

- 1.1 Leiston-cum-Sizewell Town Council has applied for designation of a neighbourhood area under the Neighbourhood Planning (General) Regulations 2012. The proposed neighbourhood area comprises the parish of Leiston which covers the town of Leiston and the rural areas largely to the north and east.
- 1.2 Guidance advises that a neighbourhood area must be coherent, consistent and appropriate in planning terms, taking into account:
 - Natural or man-made features
 - Catchment areas for current and proposed infrastructure and services
 - Development proposals and allocations
 - Environmental designations
- 1.3 It is suggested that the proposed neighbourhood area is not coherent, is inconsistent and is inappropriate in planning terms and an improved neighbourhood area is suggested with supporting planning reasons.

2.0 OBJECTION

- 2.1 The proposed area covers the town of Leiston and the rural areas, largely to the north and east. In emerging planning policy, the Draft Core Strategy defines Leiston as a second tier settlement in the overall settlement hierarchy, being a focal point for employment, shopping, community facilities and a transport hub. It is in the same category in planning terms as Aldeburgh, Framlingham, Saxmundham and Woodbridge.
- 2.2 By contrast, the rest of the proposed neighbourhood area including Sizewell is 'open countryside'. This remainder area outside the town accounts for the vast majority in terms of size of area of the proposed neighbourhood area, yet experiences different planning issues to the town itself. Whilst it is acknowledged that parishes in the area often comprise a town and surrounding countryside, owing to the particular circumstances in this case eg: development of Sizewell C it is suggested that the proposed neighbourhood area is not coherent in planning terms and to be coherent, the area should either be drawn more tightly around the town itself or it should include a much wider area.
- 2.3 The Localism Act 2011 inserted section 61G of the Town and Country Planning Act 1990 and defines the meaning of 'neighbourhood area'. It states:

'In determining an application [for a neighbourhood area] the authority must have regard to –

- (a) the desirability of designating the whole of the area of a parish council as a neighbourhood area, and
- (b) the desirability of maintaining the existing boundaries of areas already designated as neighbourhood areas.'

With regard to (a) above, it is therefore acknowledged that there appears to be a presumption in favour of designating at least the entire parish area as a neighbourhood area but to form a coherent unit, it is suggested that the neighbouring parishes which experience the same planning issues as the rural parts of Leiston parish should come within the designated area.

- 2.4 The surrounding rural parishes of Theberton, Westleton, Knodishall and Aldringhamcum-Thorpe, all of which have a border with Leiston parish, form as much a part of the proposed neighbourhood area as those rural areas within Leiston parish boundary and outside the town. It is therefore inconsistent to exclude these parishes from the proposed neighbourhood area. It may be argued that parishes beyond those immediately bordering Leiston have an equally valid claim to be included, such as Middleton, Dunwich and Friston – and possibly it could be argued that the neighbourhood area should cover Saxmundham, other parishes to the north and Aldeburgh. It is noted that the first Neighbourhood Plan nationally to be formally adopted (Upper Eden Neighbourhood Plan in Cumbria) covered 17 parishes and another well-developed plan, Fosse Villages Neighbourhood Plan in Leicestershire) covers 11 parishes. It may be that a neighbourhood area covering a larger number of parishes with similar planning issues can form a more meaningful, coherent, consistent and appropriate unit.
- 2.5 The services and facilities available in Leiston serve not only the town itself and rural areas within the parish but those villages and areas beyond the parish boundary. The catchment area for infrastructure and services such as schools in Leiston spreads into the rural hinterland and in planning terms taking the parish of Leiston alone as a neighbourhood area is inappropriate for this reason.
- 2.6 Equally, development proposals not least Sizewell C will impact not only Leiston parish but all of the surrounding parishes. It would therefore be appropriate in

planning terms to bring these surrounding parishes into the proposed neighbourhood area.

- 2.7 Environmental designations such as the Area of Outstanding Natural Beauty and SSSIs (eg: Leiston-Aldeburgh SSSI and Minsmere-Walberswick SSSI) do not follow parish boundaries and it is suggested that these designations should be taken into account when determining a neighbourhood area.
- 2.8 In terms of natural or man-made features, an argument can be put forward to use the A12 as the natural western boundary for the neighbourhood area, possibly the A1094 or the River Alde to the south and the River Blyth to the north – but an equally coherent, consistent and appropriate area would take Leiston and its immediate rural neighbours as the proposed designated neighbourhood area.
- 3.0 SUGGESTED PROPOSED NEIGHBOURHOOD AREA
 - It is proposed that the following parishes form the neighbourhood area:
 Leiston parish and the surrounding parishes of Theberton, Westleton, Knodishall and
 Alringham-cum-Thorpe with others such as Middleton, Dunwich and Friston if they so wish.
 - 3.2 An alternative option is to include the above parishes and also Saxmundham, Kelsale, Yoxford, Darsham, Blythburgh, Walberswick, Sternfield and possibly Aldeburgh.

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