

# LEISTON NEIGHBOURHOOD PLAN 2015-2029



## CONSULTATION STATEMENT

JUNE 2016

# 1. Consultation Process

## Introduction

- 1.1 This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Leiston Neighbourhood Plan (LNP).
- 1.2 The legal basis of this Consultation Statement is provided by Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations, which requires that a consultation statement should:
  - contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - explain how they were consulted;
  - summarise the main issues and concerns raised by the persons consulted; and
  - describe how these issues and concerns have been considered and, where relevant addressed in the proposed neighbourhood development plan.
- 1.3 The policies contained in the LNP are as a result of considerable interaction and consultation with the community and businesses within the parish of Leiston-cum-Sizewell (hereinafter referred to as just Leiston). Work has involved community groups over approximately two years, as well as surveys, public meetings and events. This has been overseen and coordinated by the Leiston Neighbourhood Plan Group which was formed to lead the LNP. Views and interactions from this process led to the Vision and Objectives in Section 3 of the LNP, and subsequently therefore form the basis for the key policies set out in Sections 5 to 13 of the LNP. Non-land use objectives that have come out of the process of preparing the LNP are included in Section 14.

## Organisational structure of the LNP

- 1.4 The LNP has been prepared after extensive community involvement and engagement. The LNP Group has reflected the views of the community calling for well-designed development which is principally to address local needs along with the provision of the necessary community infrastructure.
- 1.5 The structure put in place was five groups of volunteers who wished to work in their own particular area of expertise or interest. These were Housing, Employment (business and retail), Environment, Recreation and Youth. Each group absorbed various other issues relating to transport, business etc. as they emerged. The leaders of each group met regularly to ensure everything was covered and that they were all aware of each other's endeavours.
- 1.6 In total there were 20 volunteers from the community on the five working groups with each group being joined by a Town Councillor.

- 1.7 The Working Groups met regularly, as did the Joint Steering Group, and the minutes of meetings were made available on the Neighbourhood Plan website – this has now been closed and all the main documents now put on the Town Council website which was getting better hit rates [www.leistontowncouncil.gov.uk](http://www.leistontowncouncil.gov.uk)

### **Public events and consultation activities**

- 1.8 Surveys and consultation activities were undertaken as shown in Table 1.1. on the next page. Examples of the various publicity material are shown in the appendices. A summary of the key points from the events and activities is shown Annex G, H and J.

### **Stakeholder consultations**

- 1.9 Throughout the process, The LNP Group worked closely with Suffolk Coastal District Council (SCDC). Meetings were held with officers from SCDC to address matters pertaining to housing and other areas where their Local Plan coincided with the LNP. There was also an ongoing dialogue to discuss early drafts of the Neighbourhood Plan. The SCDC Local Plan was still under review during the process and had not yet got to the Site Specific Allocations phase. This is now underway but Leiston has been left to undertake the role of allocating sites through the LNP.
- 1.10 The LNP Group submitted a formal screening request to SCDC regarding the need for a Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) of the draft LNP in January 2015. SCDC provided its formal response in February 2015, stating that an SEA and HRA were required (based on formal responses from Natural England and the Environment Agency). A copy of the full Screening Report is included as part of the supporting evidence base.
- 1.11 The SEA Scoping Report was prepared and submitted to SCDC for formal consultation with the statutory bodies (Environment Agency, Natural England and Historic England). The 5-week consultation period ran from 24th March to 28<sup>th</sup> April 2015. The comments made were considered and revisions duly made to the Scoping Report.
- 1.12 Other consultees that the Steering Group engaged with on a continuing basis throughout preparation of the plan included:
- Suffolk County Council
  - Local landowners
  - Anglian Water
  - Natural England

**Table 1.1: List of events and engagement activities**

Event	Date	Purpose of event	Venue	Attendees/ distribution	Parish Council Magazine	Parish billboards	Website
Town Appraisal	2002	To identify significant issues and the challenges for Leiston	70% response rate	2,400 properties			
Town Appraisal	2011	An update of the 2002 results. Both Appraisals led to an Action Plan which was taken forward to the NP.	47% response rate	"			
Neighbourhood Plan launch	Oct 2012	To inform the community about the NP and to seek volunteers	Community Centre	52	Yes	Yes	Yes
	Nov 2012	Volunteers meet, form groups and get briefed.	Community Centre	21	Yes	Yes	No
	Jan-Mar 2013	Groups work on the issues raised in the Town Appraisals	Various	20	No	No	Minutes posted
Youth forum. Engagement event	Feb 2013	Specific event to seek the views of younger people in the community	Youth Club	32	No	No	No
Show Me event	Sept 2013	To use a large Community Event to engage and identify other issues not considered.	Victory Park	>1000	Yes	Yes	Yes
Call for sites	May 2014	Invitation to landowners to submit land for consideration in the NP	Post	5	No	No	No
Show Me event	Sept 2014	Using a successful idea (above) to report back to the community and get their views on the NP to date.	Victory Park	>500	Yes	Yes	Yes
Stakeholder consultation	Nov 14	Ensure District and County Council content with latest draft.					
Scoping report	June 2015						
Further comprehensive consultation	Summer 2015	The backbone of the plan was comprehensively précised in the Summer newsletter with calls for comments.	n/a	2400 properties	Yes	No	Yes
Public Meeting	Aug 2015	Public meeting called to explain and hear comment on latest draft	Community Centre	53	No, but big poster and press campaign.	Yes	Yes
Pre-submission Consultation.	July-Sept 2015	Pre-submission draft sent to stakeholders					
Consultation Day	Aug 2015	To give as many residents a further opportunity to comment on the PS draft	Solar Superstore (Leiston's supermarket)	>500	No	Yes	Yes

**Notes**

Posters	Displayed in Official Notice Boards and local shops.
Letters	Written to schools and Youth Organisations.
Parish Council Magazine	Distributed quarterly to all households with Neighbourhood Plan updates in appropriate editions.

## **Engaging with hard-to-reach groups**

- 1.13 There were no specific groups that were felt to be under-represented throughout the process. Attendance at the engagement events was from a wide cross section of the community that broadly represented the demographic mix of Leiston. Young people were difficult to get written responses from but they were pleased to engage with the process at all the face to face events organised for them (example at Annex B). Throughout the whole process the town was kept fully informed of what was happening through the Council newsletter which was delivered to 2,400 homes every quarter. This newsletter is highly regarded by residents and many responses came back through e-mail and telephone calls from residents who couldn't attend the various events.

*An example of one of the meetings we put together (Our Youth Leaders regularly updated the Group)*

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### **Meeting of the Leiston Youth Forum 29<sup>th</sup> Feb 2013 at Leiston Youth Club**

#### **Points raised during open discussion**

#### **Good things in Leiston**

1. Youth Club,
2. CYDS,
3. Skate Park,
4. The parks in the Summer,
5. Local beaches in the summer,

#### **Bad things in Leiston**

1. Drugs,
2. Underage drinking,
3. Young people getting in to pubs,
4. To many charity shops,
5. The police treat all young people like criminals,

#### **Things Leiston needs**

1. More careers advice in school and for 16 plus,
2. More housing for young adults, single flats or landlords that will do house shares,
3. Free or cheaper entry to the sports centre and cinema for local young people,
4. Supervision for the Skate park,
5. Free open access multi sports court,
6. Better shelter at the Skate Park,
7. Better lighting at the parks,
8. Boxing club,
9. Brand name fast food,
10. Better health facilities for young people,
11. More parties/discos,
12. Shops young people want to shop in,

#### **Date and time of next meeting**

Tuesday 5th March 8pm at Leiston Youth Club

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## 2 KEY RESPONSES FROM CONSULTATION

- 2.1 The Launch Event was planned for 9<sup>th</sup> October 2012, in the evening, in the Community Centre so as to be accessible and open to all residents. This was advertised in such a way so as to build upon the successful Town Appraisal of the year before which had involved the whole Town, the results of which had recently been delivered to all households in the Town. Responses from that process gave a clear starting point for further consultation.
- 2.2 Some of the NP volunteers who came forward from the event had been involved in the Town Appraisal, were well known in the Town and were very good at community engagement. They formed groups, put together lists of key issues and organised a large community event to show these off to residents to see if there were other issues that needed addressing.



- 2.3 At the September 2013 engagement event (in photographs above), the key issues that had been identified and the development of the vision was very firmly endorsed by the community. Each group displayed all the issues that they felt had been raised previously and asked for comments on the important aspects of each which needed addressing. Each group collated the comments they received and produced a report.

- 2.4 By January 2014, the Working Groups had clear evidence of what they needed to address further and started work on the Plan on a number of issues. The call for sites and site assessments were undertaken by the Housing group during spring 2014.
- 2.5 A further large Community on the Town's Recreation Ground was staged in September 2014 with the aim of repeating the success of the previous years and to show everyone how the Plan was taking shape. With good weather this was another big success and, with the proposed plans for rejuvenating the town centre on show, there was a big response although only 68 residents took the time to write down their comments. The NP group were very pleased however at the verbal responses they got and were very comfortable that they were going the right direction.



- 2.6 Comments from this event (in photographs above) were collated and considered and more additions and amendments were made to the draft to take these into account. As this draft started to take shape, the group engaged with the two major stakeholders (SCDC and SCC) on specific issues and to ensure they were generally content with it. This was assisted by the ongoing consultation on the possible new nuclear build in the Parish, (Sizewell C), because travel and transport had begun to be forensically examined by SCC so a detailed, bespoke transport assessment wasn't required for Leiston.
- 2.7 Once everything was in place a further thorough call for comments was put to all households in the Parish just ahead of, and in conjunction with the Pre-Submission Consultation (Regulation 14). The Pre-Submission Consultation was for 9 weeks, running from 1<sup>st</sup> July to 5<sup>th</sup> September 2015. This elongated period reflected the fact that it included a major holiday period.
- 2.8 The stakeholder comments from this, along with the other major comments received from residents, were considered and actioned in November and December 2015 before the final submission draft was presented to the Town Council for final approval and submission to SCDC in January 2016.

### **Consultation with key stakeholders**

- 2.9 A specific issue that arose through the development of the Neighbourhood Plan was the proposals for the Town Centre redevelopment (Policy TC2). One of the main landowners is Suffolk Coastal District Council. At Pre-Submission Consultation (Regulation 14) stage, representations made by the District Council identified concerns over the wording in the draft Neighbourhood Plan which appeared to confirm a commitment by the District

Council to the sale or disposal of the land in question in order to bring forward proposals in line with the proposed allocation. As a result, Leiston Town Council met with representatives of the District Council in February 2016 to seek clarification through on these matters. Following this meeting and further written correspondence from the District Council in March 2016, the position was clarified and text agreed to go into the Submission Version of the Neighbourhood Plan.

2.10 The March 2016 letter from Suffolk Coastal District Council is shown in Annex M.

### 3 REGULATION 14 PRE-SUBMISSION CONSULTATION

The Neighbourhood Plan Steering Group finalised the Draft LNP in June 2015. The Regulation 14 Pre-Submission Consultation ran for a nine-week period from 1<sup>st</sup> July to 5<sup>th</sup> September to account for the summer holidays. A coordinated publicity campaign was undertaken as detailed above in addition to notifying statutory and non-statutory consultees via email (where possible) and/or hard copy letter if no email address was available and a clear link to the website displaying the plan was included at [www.leistontowncouncil.gov.uk](http://www.leistontowncouncil.gov.uk) .

#### Distribution to Statutory and Non-Statutory Consultees

- 3.1 In accordance with requirements of the Neighbourhood Planning Regulations, relevant statutory consultees were notified by letter. In addition, a range of parties that the Steering Group considered were likely to have an interest in the plan were also written to. All parties were advised to download a copy of the plan, but were advised that hard copies could be issued on request.
- 3.2 The full list of statutory consultees that were written to is as follows:

Consultee	
nhi.huynh-ma@hca.gsi.gov.uk	Homes and Communities Agency
consultations@naturalengland.org.uk	Natural England
Andrew.hunter@environment-agency.gov.uk	Environment Agency
eastplanningpolicy@historicengland.org.uk	Historic England
townplanningse@networkrail.co.uk	Network Rail
planningee@highways.gsi.gov.uk	Highways Agency
planning@marinemanagement.org.uk	Marine Management Organisation
sBull@anglianwater.co.uk	Anglian Water
Hilary.Hanslip@eastssuffolk.gov.uk	Planning Policy SCDC
planningee@highwaysengland.co.uk	Highways England
robert.feakes@suffolk.gov.uk	Planning Policy SCC
pc@aldringhamcumthorpe.suffolk.gov.uk	Aldringham Parish Council (neighbour)
c.vharrison@btinternet.com	Knodishall Parish Council “
clarkehk@yahoo.com	Theberton Parish Council “
ianpratt@aol.com	District Councillor
tonyxcooper@hotmail.com	District Councillor
planning1@live.co.uk	Land owner SA3
glencairnogilvie@tiscali.co.uk	Land owner SA2
tony@flreadhead.wanadoo.co.uk	Land owner SA1
Malcolm@avplan.co.uk	Agent SA4
christopher.smith@hopkinshomes.co.uk	Developer SA2

#### Responses

- 3.3 In total there were 9 respondents to the Pre-Submission Consultation. This reflected a mixture of landowners and other stakeholders.
- 3.4 The schedule of comments and the respective responses made are shown in Appendix J and L. As a result, the Submission LNP has been appropriately amended.

ANNEX A-M tell the story of how the residents of Leiston were firstly encouraged to participate in the Plan's formation and then consulted on its contents. The allocation of sites for housing elicited very little comment surprisingly but the aspiration for the regeneration of the Town Centre captured many resident's imagination and drew them into the consultations. The Town Centre and Employment group engaged with increasingly interested and potential partners to work this up and its final presentation caught residents' imagination and enabled other issues to be picked up through the extensive dialogue that this main issue generated. A brief summary of the Town Centre consultation is at ANNEX H.

ANNEX A	The Launch October 2012
ANNEX B	An update – the groups were briefed and ready to start work April 2013
ANNEX C	The first major consultation event Summer 2013
ANNEX D	Neighbourhood Area decision and consultation
ANNEX E	Letter to landowners around the town
ANNEX F	The second major consultation event and advertisement Summer 2014
ANNEX G	Summary of responses from 2014 consultation
ANNEX H	Town Centre and Employment – consultation on regeneration.
ANNEX I	Pre-submission notification to statutory bodies.
ANNEX J	Pre-submission consultation advertisement, summary and responses
ANNEX K	Summary of actions remaining November 2015
ANNEX L	Pre-submission commentary on Key Issues
ANNEX M	Letter from Suffolk Coastal District Council regarding town centre redevelopment

## ANNEX A

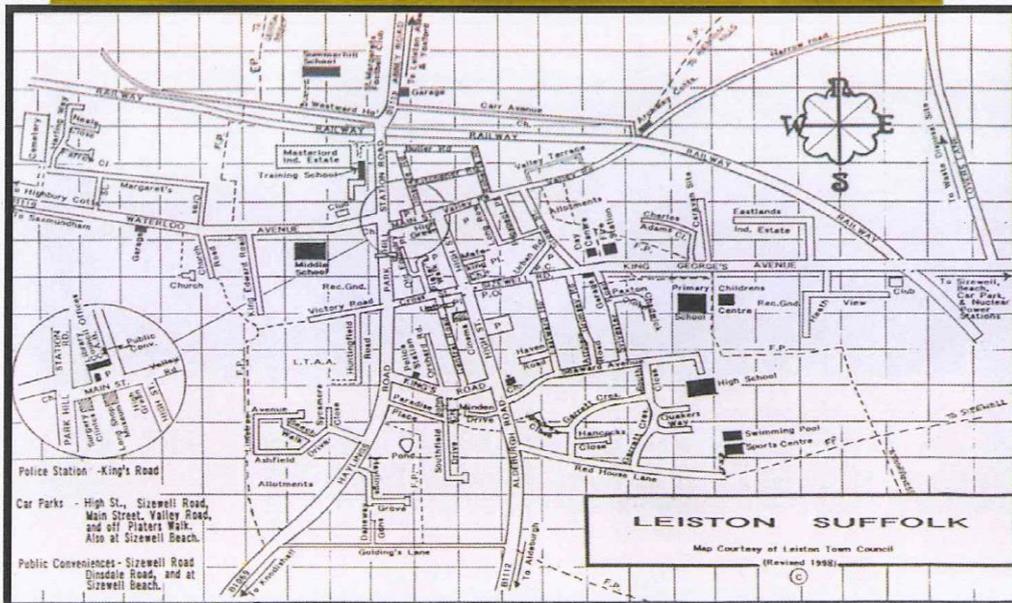
After the Town Council agreed to attempt a Neighbourhood Plan they agreed that it should be community led and hoped that the residents were not too tired of "Appraisals". The worry was that all the answers and issues collected from the two recent appraisals were largely still unresolved (being dependent upon large infrastructure investment from other agencies) and that they would not be able to differentiate the difference the new opportunities included in this new legislation provided. The quarterly newsletter is widely read, very popular and is delivered very efficiently by a distribution company to all households as a separate and unaccompanied periodical. This was the call for volunteers.



# LEISTON-cum-SIZEWELL NEWSLETTER SUMMER 2012



**HAVE YOUR SAY  
AND MAYBE  
GET INVOLVED**



**TUESDAY 9TH OCTOBER 7.00PM  
COMMUNITY CENTRE**

A major initiative is being launched by the Town Council which will affect the way Leiston develops over the next 20 years. Taking advantage of a Government project it is intended to produce a NEIGHBOURHOOD PLAN for Leiston-cum-Sizewell which will lay out exactly what residents want to see in their town, and where. It has to reflect everyone's views and, although led by the Council, it will be put together by YOU. Please come along if you would like to find out more and maybe even get involved in this exciting project.

Read more inside.....

## WHAT SORT OF PLACE WILL YOUR LEISTON BE IN 20 YEARS' TIME?

**Now is your chance to shape the future by getting involved in the Leiston-cum-Sizewell Neighbourhood Plan. Come along to the Launch Event on Tuesday 9<sup>th</sup> October and find out more.**

A Neighbourhood Plan is your chance to shape the future of Leiston-cum-Sizewell. New planning powers handed to the Town Council by Parliament mean that local people can have a say on what happens over the next 15—20 years.

### ***“What power will this give us?”***

The neighbourhood plan will provide some of the important policies which future planning applications – of all kinds – will be judged against. Therefore it is a document that will have a major say in whether applications in the parish are approved or refused. That power is in your hands. This has never been the case before, so this is genuinely ground breaking.

### ***“Doesn't the District Council produce this plan?”***

Up until recently they were the only ones permitted to produce a plan. But the Coalition Government's localism agenda has passed the power on local matters to local people. The District Council's plan will still be important in setting the high level planning policies but most decisions, including potentially the total amount of houses to be built in and around Leiston, can now be made locally.

### ***“So what can our Neighbourhood Plan cover?”***

This is largely up to you. The Town Council has come up with a list of issues it considers to be important, including:

Housing - the amount, location and type of housing

Employment - how best to protect employment and bring new businesses to town

Transport – how to improve bus services, introduce a rail service and look at improving traffic flow through the town centre

Parking – ensuring new developments have off-road parking

Town centre – improving the surroundings and considering possible sites for a new supermarket

Recreation – improving green open spaces and play/youth facilities

Sites – considering the best use for various sites around town.

Health – looking at ways to possibly provide a new, larger GP surgery in the town

Energy – ways to maximise on-site energy generation by renewable sources

**These are just ideas** – ultimately what the Neighbourhood Plan covers is up to you.

### ***“How can we get involved?”***

This is not the Town Council's plan, it is the community's plan. Without the involvement of residents, business, community groups, landowners, etc, we have no Neighbourhood Plan. We need your help.

There will be a launch evening on **Tuesday 9<sup>th</sup> October, starting at 7pm in the Community Centre.** At this event we will tell you more about the neighbourhood plan and how you can get involved. If you are just interested in what is going on this will also be an opportunity for you to ask any questions you may have and to register that interest. Don't worry, this won't take up vast amounts of your time, but it will give you a chance to shape the issues you feel passionate about in Leiston.

Tell your friends, colleagues and anyone else you know – encourage them to get involved too. Others across the country are doing this in their communities and are finding out that it can be a lot of fun!

## ANNEX B

### An update in the Spring edition of 2013

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#### Welcome to the Leiston-cum-Sizewell Town Council Newsletter

It's been a busy couple of months for the Town Council, we have been participating in various forums discussing responses to the Sizewell C Consultation which ended on February 6th, the response from the Town Council can be found on our website. As well as comprehensive debates at council meetings members have been involved with responses from the Sizewell Parishes Liaison Group, a group of Parish and Town Councils within about 10miles of Sizewell and took part in a participation event with the Joint Local Authorities Group, a joint committee of the County and District Councils.



We have also made a response to the consultation on the revision to the Sizewell sites Emergency Plan, that response will also be available on our website after our March meeting.

During our deliberations to produce our budget for next year we received the unwelcome news that the District Council is changing the way that the Tax Base is calculated reducing the Tax Base for the Town, this due to the Governments changes to Council Tax Benefits, which will mean that for the Town Council to receive the same amount as last year we would have to ask for almost an extra £20 for each Band D property. As well as this hit for the Council Tax payers all those of working age who are eligible for Council Tax Benefit will have to pay at least 8.5% of their bill, the benefit for pensioners is protected and will remain as it is at present. All this has meant that although we have set our budget at the same level as the present year we will be asking for an extra 37p per week for a Band D property.

The Town Council has discovered that plans are being produced which will put the future of the Youth Club in jeopardy. Readers may well remember an article in a newsletter last year describing the development of facilities at the old middle school building for the

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Youth Club, now plans are being made to use more of the building for a Children's Centre than we had been expecting meaning that the Youth Club could be left with a small space which they will be expected to move equipment in and out of before using it. We feel that this is totally inadequate and urgent talks are being arranged with County Council and Alde Valley School to try to get a secure future for the Youth Club.

The Council was very pleased with the Bright Sparks production of Cinderella at the Film Theatre and the fact that extra performances had to be put on shows that the annual Pantomime has become a popular event in the Town and our thanks go to Wayne and all those who performed and helped behind the scenes for brightening the winter months.

**Cllr Terry Hodgson**

#### NEIGHBOURHOOD PLAN – OFF THE STARTING BLOCK.

Follow progress on [www.LeistonNeighbourhoodPlan.org](http://www.LeistonNeighbourhoodPlan.org)

You may recall last year's newsletter which asked for your help to produce a Neighbourhood Plan for Leiston. Well, over 20 residents have got involved and have begun to get to grips with the issues facing the town. They are currently looking at various items relating to housing, infrastructure, the Town Centre, employment, social aspects, community requirements and young people. Some of these issues will end up with the group recommending certain sites in the town be used for certain uses and they will also be setting clear guidelines on how we all might wish to see Leiston develop in the next 15 to 20 years.

Your help is still required however. Some residents have come forward to raise issues that concern them and these have been passed on to the relevant group to look at. If you have any thoughts on any of the broad headings above please get in touch with the Town Clerk who will pass it on. If you would like to get involved and become part of one of the groups you would be extremely welcome. It would involve a couple of meetings over the next few months and only as much input as you would be willing to give. It would be great to hear from you.

John Rayner

Magazine cover advertising first major consultation event. Done as a Community day to get as many residents as possible to view the plans....



# LEISTON-cum-SIZEWELL NEWSLETTER SUMMER 2013



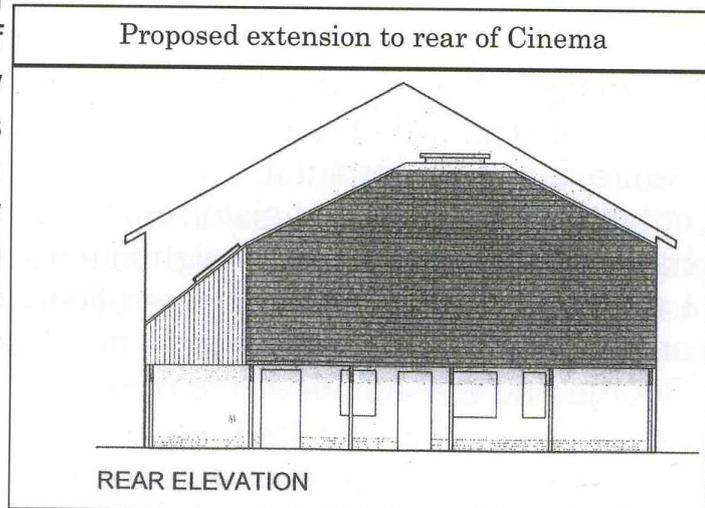
“SHOW ME” Community Event  
Victory Road Recreation Ground  
Saturday 28th September from 11am - 3pm.



Come and participate, join in or just come and enjoy all the activities. Make a date in your diary and look out for more details soon. More on page 4.

### Important consultation.

With the centenary of your Film Theatre coming up next year the venue has reached an important stage in its evolution and needs some investment. If you are familiar with the rear of the building you will know that the changing rooms are currently housed in a 1970's single storey extension to the original building. The plans to ensure these are fit for the future are on page 8.



[Allotment Announcement on page 18.](#)

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**Free Event - Show Me Leiston  
28<sup>th</sup> September 2013 10am-3pm  
at Victory Road Recreation Ground Leiston**

Discover what your town has to offer... and how you can get involved.

On display will be the town's businesses, charity groups and voluntary agencies.

Music and entertainment will be provided by Leiston Film Theatre, Bright Sparks and the Leiston British Legion Band.

There will be displays from the Leiston Longshop Museum, Leiston Sports Centre, Leiston Football clubs and local schoolchildren.

This is also your opportunity to have your say on the development of the Leiston Neighbourhood Plan which will be on display during the day.

All spaces are free so if you are a Leiston business or organisation and want to promote your service or activity for free to the people of Leiston and beyond please contact Nick Boulter on 07720349222 or Email: [showme@visitleiston.com](mailto:showme@visitleiston.com) or visit [www.visitleiston.com/showme](http://www.visitleiston.com/showme)



This was a big success as regards to getting residents, who would not otherwise have bothered, to engage with the Neighbourhood Plan project. The skatepark "skate-jam" attracted families and our younger residents and it was decided to use the same format for the next consultation.

ANNEX D

Neighbourhood Area Consultation (in Parish Magazine)

Neighbouring Parishes also written to and their approval noted.

Regulations decree that this decision notice has to be brought to the attention of all who live, work or carry on business within the neighbourhood area.

**Suffolk Coastal District Council**

Melton Hill, Woodbridge, Suffolk IP12 1AU  
Tel: (01394) 383789  
Fax: (01394) 385100  
Minicom: (01394) 444211  
DX: Woodbridge 41400  
Website: www.suffolkcoastal.gov.uk



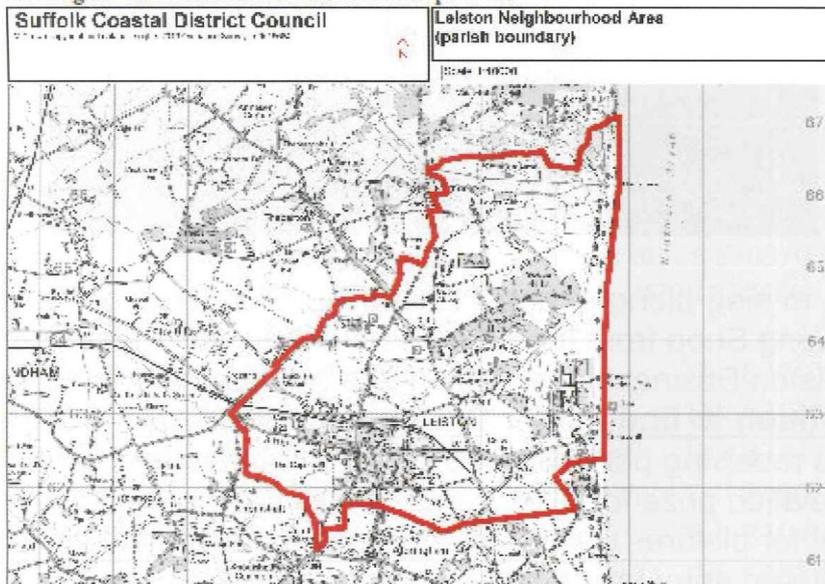
**NEIGHBOURHOOD PLANNING NOTICE**

**The Neighbourhood Planning (General) Regulations 2012 (Article 7)**

In accordance with the above Regulations, notice is hereby given that Suffolk Coastal District Council has **APPROVED** the following neighbourhood area:-

**Name of neighbourhood area** LEISTON  
**Name of "relevant body"** LEISTON TOWN COUNCIL

The neighbourhood area is identified on the map below.



Signed

Date: 29/10/2013

Philip Ridley - Head of Planning & Coastal Management Services

Volunteers who undertook to produce a Neighbourhood Plan for Leiston are well advanced now and thank everyone for their contribution at the recent Show Me event on the recreation ground. The next step will be to put together a skeleton plan for comment.

## ANNEX E

Example of letter sent to the landowners with possible sites for inclusion in a future plan.

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# Leiston-cum-Sizewell Town Council



John Rayner, Town Clerk

Council Offices, Main Street, Leiston, Suffolk, IP16 4ER  
Tel: 01728 830388

[townclerk@leistontowncouncil.gov.uk](mailto:townclerk@leistontowncouncil.gov.uk)

Our Reference: NP 080514

Mr G S Ogilvie  
Hawsells Farm  
Red House Lane  
LEISTON  
IP16 4LS

Dear Glen,

### **YOUR LAND SITUATED SOUTH OF RED HOUSE LANE (761B, 1004)**

As you may be aware, Leiston-cum-Sizewell Town Council is in the process of producing a Neighbourhood Plan for the parish, covering the period to 2027. As part of this, we are considering the merits of making site allocations for development. We are therefore writing to landowners in the parish whom we believe may have an interest in promoting their land for development.

This letter is a formal request that if you wish for your land to be considered for allocation in the Neighbourhood Plan, then please could you provide a short written response demonstrating how the land could help to achieve the objectives and policies of the emerging Neighbourhood Plan, outlined in the matrix at the end of this letter. **We would be grateful if you could use the matrix to provide your response against each objective.**

We are primarily looking at the above site for residential use but would request that, along with your response, you include the following:

- A clear statement of which types of development you wish your land to be considered for, e.g. residential, employment, etc.
- The area of the land in hectares.

- A plan which clearly shows the extent of the land that you wish to be considered.
- An understanding of how the site would be accessed by vehicle and opportunities for linking in with existing footpath/pavement and cycle routes.

We also would like to understand whether you have any other land elsewhere in the parish that you may wish to put forward to provide wider community benefits in addition to those that may be achieved on the land you are proposing for development. This may include, for example, space for children's play areas, a community hall or an area to be planted as a community woodland for example.

It is understood that any response represents a draft position and at this stage does not automatically bind a landowner to make any such provisions. Equally however, the Neighbourhood Plan can only propose to allocate sites if they are demonstrably deliverable and this is a matter which you may wish to address in your submission.

The deadline for your response is **5pm on 20<sup>th</sup> June 2014**.

We have engaged Navigus Planning Ltd. to co-ordinate all responses and would appreciate it if you would reply, either in hard copy or by email, directly to:-

Mr Chris Bowden  
Navigus Planning  
Truro  
Lushington Road  
Maningtree, Essex  
CO11 1EF

[chris@navigusplanning.co.uk](mailto:chris@navigusplanning.co.uk)

Tel: 01206 700260

If you have any questions specific to this request, please contact Mr Bowden directly. If you wish to have a more general discussion about the Neighbourhood Plan, please contact me on the above number.

Yours sincerely,

**John Rayner**  
**Town Clerk**

ANNEX F

Once the Plan had taken shape it was put to further extensive consultation.



**LEISTON-cum-SIZEWELL  
NEWSLETTER  
SUMMER 2014**



**SATURDAY 27<sup>th</sup> SEPTEMBER  
11am until 3pm  
VICTORY ROAD RECREATION GROUND**



**SEE THE FUTURE OF LEISTON AND  
CELEBRATE OUR COMMUNITY**

On Saturday 27th September there will be another “Show Me” event on Victory Road Recreation Ground (these pictures are of last year’s) Local organisations and groups will be showing what they do for the community and there will be stalls, food and competitions to keep everyone entertained. Most important of all though will be the unveiling of the new proposed plans for the Town Centre for consultation and the final draft of the Neighbourhood Plan, including proposed new housing sites, for you to comment on.



*...See page 10 ...*

OFFICIAL NEWSLETTER OF LEISTON-cum-SIZEWELL TOWN COUNCIL

## ANNEX F Continued....

The event was another success (good weather!) and other residents took the time to visit the Council Chambers too.

Page 10

### LEISTON'S NEIGHBOURHOOD PLAN CONSULTATION



It has taken a long time but we are now getting very close indeed to the final draft of the Neighbourhood Plan for Leiston-cum-Sizevell. The whole process necessarily takes time as it is a statutory process under government legislation so, when it is complete, the plan becomes a quasi-legal document that has been inspected and approved by a Government Inspector and therefore holds a lot of weight in the planning process.

The essence of the whole plan is that it reflects what the community wants and must therefore have been thoroughly consulted upon. The plan includes a vision and a blueprint for how we want the town to grow over the next 20 years. When you come to the Show Me event you will see a **proposed blueprint for the exciting new Town Centre** which we would like to hear your views on please and you will be able to see

Page 11

where and what sort of housing we are recommending for the future expansion of the town. There will be plenty to look at and to excite your interest.

The plan also has details of where we would like to see a new community centre built in the town and what our aspirations are for improving the infrastructure around us.

Residents on the Neighbourhood Planning groups have worked hard to ensure they have covered all your views and would welcome comments on the final proposals. The whole plan goes to a referendum in the town once it has been completed and approved by the Inspector so it is essential that, if you are not happy with it, you say so now.

Please come along to the Show Me event if you are able but the plans will also be on show for you to inspect in the Council Offices from 29th September until 24th October. We look forward to seeing you and hearing your comments.

*John Rayner*



#### COMMENT ON THE NEIGHBOURHOOD PLAN

Council Chamber - 29th September to 24th October 2014

Show Me event Victory Road Recreation Ground 27th Septemeber

## **SUMMARY OF COMMENTS FROM NEIGHBOURHOOD PLAN CONSULTATION SEPT/OCT 2014**

The third draft of the Neighbourhood Plan for Leiston was unveiled and displayed at a large consultation event organised on Victory Park in the centre of town on 27<sup>th</sup> September. The main display was of the proposed sites for future housing in and around the town and the plans, and an artist's impression, of the proposed redevelopment of the Town Centre. The event was attended by over 500 people during the day and many took the time to write down their comments for us to take into consideration. Many others voiced their opinions which were along the same lines as the written responses and will be cohesively included in the following summary. The display and draft plan were then on daily display in the Council Chambers for a further four weeks. Over 30 residents visited in this time and some landowners and partners in the plan took time to come and discuss it further too.

### **Summary of comments** (which are available for inspection if required)

*There were 68 written responses.*

The overriding response to the Town Centre proposals was one of support as long as the development included a small to medium sized supermarket. There was little support and much negativity for the idea of an underground car park however but the concept of a market square was almost universally supported with a good proportion of caveats that it included trees, seating and landscaping as well as occasional parking on the square. Some thought that there was an opportunity to put a transport hub at the rear of the civic building as a mini coach station perhaps?

There were more comments questioning the need for the indicated amount of housing in the town centre than there were for support with the feeling that the car park should be retained, reshaped and extended with fewer residential units. A couple of suggestions were for parking bays under flats rather than underground car parks....

Housing got some overall general comments supporting expansion with the main concerns being the ability of the surgery to cope. There were four responses extremely concerned about any expansion due to their fears of the

Emergency Plan for Sizewell being unable to cope although another mentioned (and supported) the Local Plan's regard for off street parking in this context. Comments on the specific sites were quite small with by far the main objections being to the use of the field behind St Margaret's Crescent for housing. This was for mainly environmental reasons but density and access were also issues. The reserve site on Red House Lane was also questioned on need and environmental grounds. One response in support of the cemetery expansion with necessary housing to achieve it. Two detailed responses (not objections) to the Abbey Road site with requirements for a vegetation barrier and s106 suggestions to sound proof nearby established kennels.

Interesting ideas for Shotter's Garage site to redevelop to become small convenience store for that end of town as well as for fuel.

Traffic still an issue and a one way system suggested several times to possibly alleviate the problem. Shared space concepts not supported by partially sighted residents.

Good support for closing Kemps Hill and for concentrating on creating other cycle routes too.

Overall a very positive reception, a clear mandate to try and modernise and improve the town centre, attract another large retailer and to adjust the town centre housing to retain ground level parking. Careful consideration needed on how to develop the St Margaret's Field but firm support for cycling initiatives and improving the infrastructure to cope with expansion. The Emergency Plan will have to address all the issues raised with this separately.

## ANNEX H

### Town Centre and Employment Group

#### Consultation on TC2

In September 2013 the group looking at the town centre and employment met with the Leiston Business Association and helped set up a “Town Team” (with a joint mission to work on the Mary Portas initiative which was ongoing at that time and to help get opinion from the traders in the town on what to put in the Plan). A questionnaire was taken round personally to each of the businesses in Leiston and the results could form part of the evidence if required. A summary of the participants is overleaf.

The questions gained responses on employment, employees, trading conditions, desired improvements, helpful improvements, suppliers, customers, the tourist trade and parking.

From this and discussions with the businesses it became clear there was a substantial need to regenerate the Town Centre and to use the large expanse of redundant land behind Sizewell Road to do this. Armed with this the group met and engaged with the two landowners of this site (one private and the other Suffolk Coastal District Council). These talks were positive and there was encouragement from the District to proceed as their retail surveys had identified a similar need.

The team then engaged with;

The Department of Work and Pensions (Job Centre Plus)

NWES – an East of England Business Advice and Support organisation.

SCDC Economic Development

EDF New Nuclear Build

The 7 churches in the Town

East of England Co-operative

Orwell Housing Association

Suffolk Libraries

A local firm drew up some indicative plans of the regeneration for display at all the consultation events for the Plan and there were continuing dialogue, surveys and meetings with all the stakeholders to ensure the Plan was viable, sustainable and appropriate.

# LEISTON TOWN TEAM

(INCLUDING SIZEWELL)

## TRADER QUESTIONNAIRE – Spring 2014.

### Introduction.

A)

The following businesses participated in this research and completed questionnaires:-

<b><u>FOOD RETAILERS</u></b>  Greengrocer  Butcher  Post Office Stores	<b><u>OTHER RETAILERS</u></b>  Florist Carpets and Bedding Cards/gift shop Computer shop Haberdashery Shoe shop Furniture/Antiques Promotional clothing 2 x Newsagents 2 x Pharmacies Optician 2 x Hardware 3 x Electrical/TV 4 x Charity shops 3 x Estate agents.
<b><u>OTHER</u></b>  5 x Public Houses/Bars Cafe 6 x Hairdressers/ Barbers Tanning/Beauty parlour Tattoo parlour Coach operator Betting shop Garage/servicing Cinema/Theatre Holiday park	<b><u>FINANCIAL AND SERVICES</u></b>  Bank Building Society (Post Office included with food retailers)  D.W.P.

Total 50 participants.

B)

1. Other businesses may have completed the on-line questionnaire distributed to LBA members.
2. We are awaiting input from the largest retailer in Leiston – the East of England Co-op Supermarket.
3. Only 4 traders refused to participate in the research.
4. Others never “got around to it”, despite several follow up visits or we had difficulties establishing contact with owners/managers e.g. many of the takeaway restaurants.
5. There were therefore some 25 non participants.

## ANNEX I

Letter sent to statutory (and other) consultees to alert them to the pre-submission consultation.

### Leiston-cum-Sizevell Town Council



QUALITY  
TOWN  
COUNCIL

John Rayner, Town Clerk  
Council Offices, Main Street, Leiston, Suffolk, IP16 4ER  
Tel: 01728 830388  
townclerk@leistoncouncil.gov.uk

14 July 2015

Our Reference: NP 130715

**Town and Country Planning Act 1990  
The Neighbourhood Planning (General) Regulations 2012  
Part 5 – paragraph 14**

**PRE-SUBMISSIONCONSULTATION DRAFT NEIGHBOURHOOD PLAN**

This letter is being sent to you in accordance with Part 5 – paragraph 14 of the above regulations.

Leiston-cum-Sizevell has prepared a draft Neighbourhood Plan which can be inspected at the following websites:

- [www.leistoncouncil.gov.uk](http://www.leistoncouncil.gov.uk) Under "Neighbourhood Plan", as well as the draft plan, there are also links to the Sustainability Appraisal Scoping Report (which incorporates the Strategic Environments Assessment) and the first draft of the Habitats Regulations Assessment.
- [www.leiston.com](http://www.leiston.com) also has a link to the Neighbourhood Plan Consultation

or the following location;

Council Offices, Main Street, Leiston, Suffolk IP16 4ER  
Leiston Library, Main Street, Leiston, Suffolk, IP16 4ER

For a hard copy please contact John Rayner, Clerk to Leiston-cum-Sizevell Town Council on 01728 830388 to discuss logistics.

**PLEASE MAKE YOUR RESPONSES BY 5pm on 4<sup>TH</sup> SEPTEMBER 2015.**

By letter to John Rayner (at the above address) or by e-mail to:  
[townclerk@leistoncouncil.gov.uk](mailto:townclerk@leistoncouncil.gov.uk)

Yours sincerely

John Rayner  
Town Clerk

ANNEX J

Regulation 14 Pre-Submission Consultation – with residents and stakeholders.



**LEISTON-cum-SIZEWELL  
NEWSLETTER  
SUMMER 2015**



**IMPORTANT**

**YOUR VIEWS ON THE FINAL DRAFT OF  
LEISTON'S NEIGHBOURHOOD PLAN  
WOULD NOW BE WELCOMED**



Please read through this issue to see  
what is being proposed and how you  
can contribute and comment.  
Please see pages 4 – 9



**MEET YOUR NEW COUNCIL**



Susan Geater (inset), Terry Hodgson, Chris Nichols, Selena Levermore, Mike Taylor,  
Bill Howard, Tony Cooper, David Morsley.

Phil Harle, Bing Boast, Lesley Hill, David Bailey, John Last, Colin Ginger,  
Helen Jackson.

**OFFICIAL NEWSLETTER OF LEISTON-cum-SIZEWELL TOWN COUNCIL**

### NEIGHBOURHOOD PLAN

Leiston Town Council is consulting you on the first stage of formal consultation with regard to its Neighbourhood Plan. This is called the pre-submission consultation.

Produced by a team of local residents over the past year or so, it is part of the Governments' plans to give local communities more say. Backed by the expertise of Navigus Planning it will help to form the base for Suffolk Coastal District Council to respond to planning applications for Leiston-cum-Sizewell Parish for the period till 2029.

Those of you who attended the "Show Me" event at Victory Park will know what is involved but if you did not get a chance to visit that event, this will be your chance to have your say before the final stages of consultation get under way. **The plan is still in draft at this stage and your comments are required to ensure this is a plan you could vote for.**

Proposed plans include, up to 365 additional houses on a number of development sites around town, a proportion of these will be affordable housing. There are aspirations for a new community centre next to Victory Road recreation ground, a new town square and market place on Sizewell Road with a car park and further affordable housing at its rear. There could also be a mixed use industrial and residential site on Abbey Road which has the potential to attract something like a family restaurant or other commercial community facilities.

**The 8 week consultation will be from 1st July until 28th August during which time events will be planned to try and get as much feedback as possible. The main contact point, where the plans will be on display, will be the Town Council offices in Old Post Office Square. Here you will be able to view the proposals as well as the important Environmental Assessments and Habitat studies that are required under European law.**

Finally, after this consultation has concluded and your comments have been assessed and considered, Suffolk Coastal District Council will carry out a consultation on the plan and then send it

to an independent examiner for approval. A formal referendum will then take place with a simple majority of residents carrying the vote for adoption.

**The Town Council wishes to sincerely thank the band of volunteers who helped get us where we are today.**

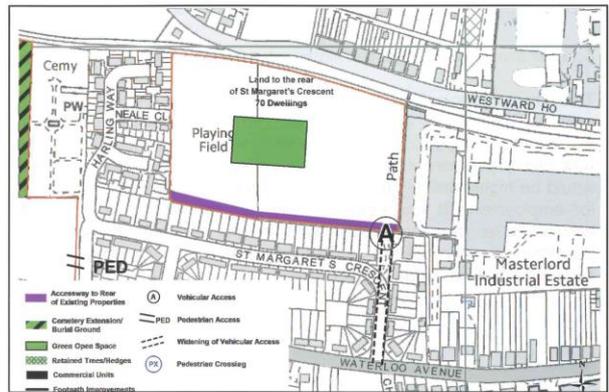
### HOUSING

This may possibly be one of the more contentious issues that the plan addresses but it is the main reason for its existence.

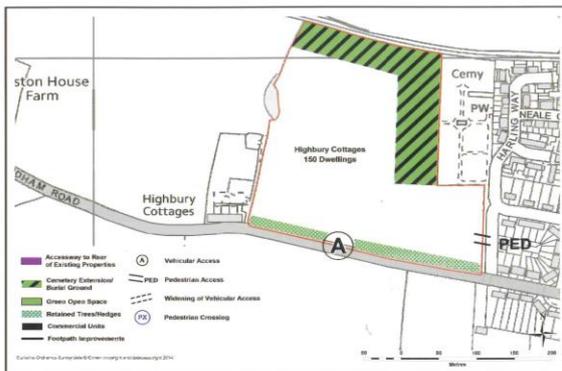
Currently, as things stand, it is very difficult to fight off aggressive developers who wish to build on various sites around the District. You may have read of some particularly acrimonious applications that have been put forward in and around Framlingham recently.

By allocating sites, specifying numbers and the desired mix of housing in our plan we will ensure that any developer coming forward has to adhere to the adopted plan.

An example would be the land behind St Margaret's Crescent. You may know that this site had planning permission for 120 homes at one stage. Our proposal requires approximately 70 homes and also allows for a recreational area. The diagram below is indicative as the green space could be distributed differently although it envisaged that the trees in the centre would stay.



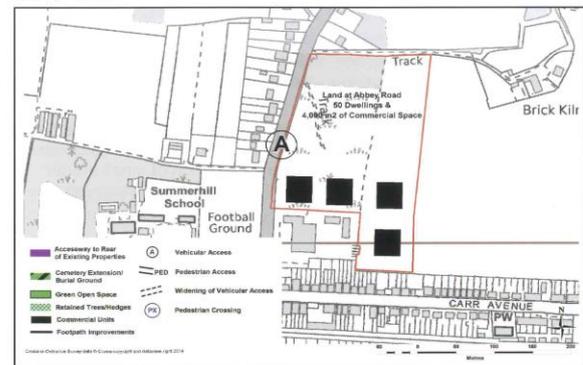
Another area that has been allocated is Highbury Field. This has the additional possibility of allowing some land to be gifted for an extension to the cemetery and some green open space.



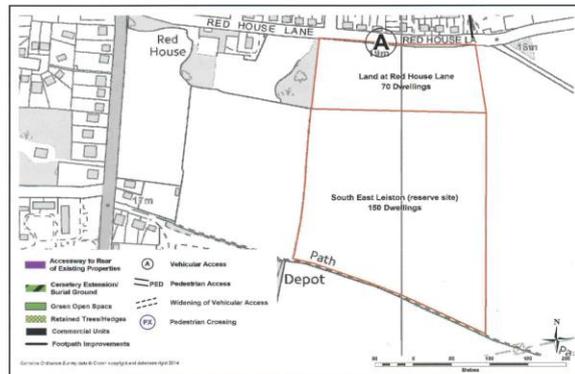
Another area proposed for development is in Abbey Road;

This site was originally allocated for commercial and employment use only ( diagram on opposite page). When the plan was being researched and put together however it was established that there was plenty of spare commercial space available and that this site would be highly unlikely to be brought forward (cost of infrastructure) for employment. It was however very well situated for commercial activity so a proposal is included in the plan for a symbiotic development which allows for housing and light commercial to be sympathetically included together.

### Abbey Road.



### Red House Lane.



The Red House lane site is the final proposal. This is well placed for the schools and will be an extension to the current development on Aldeburgh Road. It is split into two with the larger area allocated for later in the planning period covered.

The plan incorporates Suffolk Coastal's policy for 30% of the housing to be affordable (by which we mean Housing Association stock) and there will be a requirement for a greater proportion of small starter homes and flats to allow our residents to get on the housing ladder.

#### TOWN CENTRE

One message came through loud and clear at the "Show Me" events.

##### **NO UNDERGROUND CAR PARK!**

The Underground Car Park has gone but everyone was very positive about the other proposals. The market square idea (with or without fountains!) received a lot of support.

It is intended to keep this idea in the plan as a major part of invigorating and progressing the redevelopment and better usage of our town centre. The indicative drawings are still on display in the Council Offices (as the space here is a bit small to show all the ideas.) The whole project will of course be subject to finding the right partners to making the project viable. By including this concept in the Neighbourhood Plan it gives the Town ownership of its own town centre as, with housing, if we don't have a policy and a development proposal then we may lose the opportunity to plan the centre of our town as we would wish it.



#### SUPERMARKETS

This is an issue everyone has an opinion on!

The facts are however that the "Big 4" supermarkets are reducing their portfolios, not increasing them. They have no desire to invest in small towns that do not have a significant population to make it worth their while. Unfortunately Leiston, at just 6,000, is not attractive to them. Every effort is being made however to interest a supermarket in becoming a part of the new town centre proposals.

#### TOWN CENTRE DEVELOPMENT

One of the questions that came up at previous consultations was with regard to how the aspirations put forward in the plan for the town centre could actually be achieved. Although this is not part of the consultation The Leiston and District Community Partnership is working hard on the project already and is in discussions with potential partners and landowners.

#### FINALLY

The plan is still in draft and needs your comments before it goes to the final Submission Stage consultation in the Autumn. If you are in favour, have reservations, have commented before or especially, if you haven't, please take some time to contact us and give us your observations.

The diagrams are unfortunately quite small but you can see them in the Council Offices or online at [www.leistontowncouncil.gov.uk](http://www.leistontowncouncil.gov.uk) or [www.Leiston.com](http://www.Leiston.com). You can also see the whole plan at the same website or in the Council Offices.

**You can drop comments off at the Council Offices** (where you can sit in comfort and compose your thoughts in front of the plans).  
**You can e-mail:** [admin@leistontowncouncil.gov.uk](mailto:admin@leistontowncouncil.gov.uk)

Many thanks

John Rayner

There were 46 responses from residents, some quite detailed. There were also additional documents submitted by the landowner's agents all making further cases for their sites continued inclusion in the plan and, in one case, a discussion on the need (or not) for employment space to be reduced on SA4. Many residents had taken the time to read the full document and were all supportive of the aims and virtually all of the policies. There were helpful comments on how the Community Site off Waterloo Avenue could best be used and many more giving advice and views on how the Town Centre could best be developed when TC2 comes to fruition.

With regard to the land use allocations for housing there were concerns from nearby residents of both site SA4 (3) and SA3 (6). The ones where mitigation could be applied had already been considered and those that were unfortunately concerned about the impact on their amenity were noted. There were also three responses concerned again about the Emergency Plan and how the NP should have taken into account the impact that Sizewell C may make on this in years to come. (The plan's cycle for review would address this if and when.)

Flooding was another item frequently mentioned but this had been comprehensively looked at and the NP had already addressed it very well.

Other items were raised which were outside the remit of the Plan asking for policies that contradicted current Government and Local Authority legislation.

There were very specific comments from some of the statutory consultees too. Overleaf is an example from Natural England.

These are tied up in the “Commentary on Key Issues” below.

A key response was from SCDC who had just had their Local Plan passed. They had some very detailed and helpful comments for us to consider as we finalised the document before submission. SCC had a few interesting observations but the hard work with them had already been done in 2014.

Date: 24 August 2015  
Our ref: 159522  
Your ref: n/a



John Rayner  
Town Clerk  
Council Offices  
Main Street  
Leiston  
IP16 4ER  
[townclerk@leistoncouncil.gov.uk](mailto:townclerk@leistoncouncil.gov.uk)

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

**BY EMAIL ONLY**

T 0300 060 3900

Dear Mr Rayner

**Leiston Neighbourhood Plan 2015-2029 Pre-Submission Consultation Draft  
(Regulation 14) July 2015**

Thank you for your consultation on the above which was received by Natural England on 14 July 2015.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**Conservation of Habitats and Species Regulations 2010 (as amended)**

In principle, Natural England has no concerns with the proposed location and scale of development in Leiston. However, in order for the Habitats Regulations Assessment of the Neighbourhood Plan (NP) to achieve a conclusion of no likely significant effect, we have the following advice.

We recommend that Leiston NP specifically includes a reference to the findings and mitigation measures identified through Suffolk Coastal District Council's Core Strategy Appropriate Assessment. The Appropriate Assessment was unable to rule out adverse effects on European sites through increased recreational disturbance as a result of in-combination housing development in the market towns east of Ipswich. The Appropriate Assessment identified mitigation measures to address these adverse effects including on-site open space provision (particularly to cater for regular users including dog-walkers) and visitor management and monitoring of recreational pressure on the relevant European sites. For Leiston, these sites include Sandlings Special Protection Area (SPA), Minsmere-Walberswick SPA/Ramsar site and Minsmere to Walberswick Heaths & Marshes Special Area of Conservation (SAC) which are within the Neighbourhood boundary.

In taking forward housing development in Leiston, the NP should have regard to the need for these mitigation measures to be delivered to ensure no adverse effects on the European sites. Natural England is satisfied that the Leiston NP aims to deliver the 'on-site open space provision' element of the mitigation; however, to ensure certainty of delivery of this mitigation we advise that a requirement for the inclusion of open space should be specified within each of the relevant housing policies i.e. policies SA1 – SA4. We suggest that a map showing the location of open space within the Neighbourhood should be included in the NP; Aldhurst Farm habitat creation scheme can be included as this project includes public access and is in the process of being constructed.

Page 1 of 2



Natural England is accredited to the Cabinet Office Service Excellence Standard

## Suffolk Coastal District Council - Comments at Pre-Submission (Regulation 14) Stage

Page	Para/fig	SCDC Comment / Suggestion	Response and action
All		General points: All maps with an OS base should include details of your copyright licence number and north point. Photos: Source for the each photo should be clearly referenced Use information in the SA to influence information contained in plan. Historic and environmental designations also water and flooding	Point re mapping is noted and copyright will be included. All photos have been taken NP by volunteers so is the ownership of LTC.
<b>Section 1</b>			
1	1.1	Add diagram or expand text to reflect relationship between Core Strategy and neighbourhood plan. Also diagram to show where this document fits within the process and the stages still to be completed before the plan is "made". (Managing expectations – reads as though this is final plan).	This is unnecessary and will serve to further lengthen the NP which is already long enough
2	1.3	For correctness may want to refer to Neighbourhood Planning Regulations 2012 (as amended) or similar wording.	Agreed – change made
2	1.6	Heading – suggest “.. policy context”	Agreed – change made
2	1.7	Might be useful at this stage to include a list of policies to which you are referring as an Appendix. It helps to cross check that everything is covered and is a way of demonstrating that all strategic references are picked up	This will be addressed in the Basic Conditions Statement
<b>Section 2</b>			
4	2.2	Clarity “... Leiston cum Sizewell parish” . A map might be useful here just to show the areas to which you are referring ie Sizewell belts; Minsmere. We know where they are but someone moving into the area, wanting to invest in the area may not.	Noted. A map will be included in Section 8
4	2.3	Add additional sentence to reflect importance of Garrett works to developments in agriculture, numbers it employed in what is predominantly an agricultural area etc.	Agreed – change made
4	2.4	The information contained in this section could usefully be illustrated by a plan showing the main areas to which your refer – historic core, railway houses; urban district development – 1960's development. It provides an instant visual history for the evolution of the town.	Agreed – map prepared
5	2.5	Add sentence as to why Sizewell become chosen location	Agreed – change made
?	??	Missing – Need somewhere within this section or possibly the introduction to say where Leiston sits within the District – one of 5 market towns. What facilities and services it provides for settlements outside of the NP boundary – its current role (see this is set out later in 2.24 / 2.25). The fact that energy sector is important not just to Leiston and the district but is of national significance.	Agreed – change made
6	2.11	Suggest add further sentence to effect that SC DC has an older age profile than national average ( I think this is correct but double check).	Agreed – change made
11	2.23	It may be useful to add in a reference here to house prices in Leiston compared to the rest of the district.	Agreed – change made
12	2.25	General feeling is one thing – a perception rather than hard factual evidence. What you need is evidence from the service providers themselves to say what the current state of play is and what the implications are for the scales of development you are now proposing.	Noted but it is not the place of the plan to provide an audit of the 'state of play' of all infrastructure. Where the plan deals with an item then we have engaged with the relevant providers. There will be

Page	Para/fig	SCDC Comment / Suggestion	Response and action
			more detail about this in the Consultation Statement.
<b>Section 4</b>			
17	4.5	The Core Strategy should be given its full title. Suffolk Coastal District Local Plan – Core Strategy and Development Management Policies (July 2013) Suggest add “hereinafter referred to as the Core Strategy”.	Agreed – change made
18	PL1	See above. Use full title for plan or shortened version Core Strategy.	Agreed – change made
<b>Section 5</b>			
20	5.7	There should be a reference within this paragraph as to whether or not the housing proposals in the neighbourhood plan have been consulted on. Assuming they have then a reference to the Head of Emergency Planning’s conclusion should be included at this point.	Who has and hasn’t been consulted will be dealt with in the Consultation Statement
20	5.9	Needs updating. Government has had to revoke the changes it made on affordable housing.	Agreed – change made
20	5.12 & 5.14	Information on register is quoted from 2013. This should be updated to 2015. The statement re not much change can then be tested.	Agreed – latest figures included
21	5.18	Suggest name the SAC/SPA referred to in last sentence.	Agreed – change made
22	5.21	The paragraph refers to the growth proposed but does not say whether this is the 250 or 500 units or the 365 referred to in para 5.23	Agreed – change made
22	5.22	Question – what are the indications if Sizewell C is given the go-ahead	This is not relevant as it is highly unlikely to be operational during the plan period, or only at the very end of the plan period at the latest.
22	H1	This policy should identify the scale of growth that you are proposing in policies SA1 – SA4.	Agreed – change made
23	5.28	Delete. The government’s changes have now been revoked.	Agreed – change made
24	5.30	See earlier comments re providing this information graphically – if this is taken up a short reference to the relevant plan/map would be needed.	Agreed – change made
24	5.31-33	Policy H3 refers to off-street parking but there is no reference to this in the supporting text. Suggest add sentence.	Agreed – change made
25	5.34 & H4	Where is the local justification for this – has it been viability tested. Need to clarify what the “current regulations” in policy H4 refer to. Suggest make reference to the regulations in 5.34	The policy is supporting development which aspires to higher levels. It is not requiring such higher levels therefore it would be disproportionate and unnecessary to viability test this. The ‘current regulations’ will be the ones in force at the time over the plan period. These are likely to be updated regularly therefore it is likely to cause confusion if those in place today and used and are then superseded. No change made.

Page	Para/fig	SCDC Comment / Suggestion	Response and action
26	5.39	How was the 25% Lifetime homes arrived at and has it been viability tested? The evidence needs to be available for anyone to check. That check needs to take account of all other requirements eg affordable housing and CIL.	With national standards being brought in through building regulations the policy has been changed. It is now supporting development which aspires to higher levels. It is not requiring such higher levels therefore it would be disproportionate and unnecessary to viability test this.
<b>Section 6</b>			
28	6.4	Final bullet – land at Abbey Road this is also a mixed use proposal. Could amend sentence to read “The following sites are allocated wholly or primarily for housing. These allocations total 365 dwellings.”	Agreed – change made
28	6.5	See above. Start this paragraph “In addition...”	Agreed – change made
28	6.9	Question. Have other sites been put forward to you for consideration as a result of the consultation exercises you have undertaken to date? If not then confirm no other sites have been submitted to you for consideration. It is helpful to be explicit.	Agreed – change made
29	6.12	Suggest include more specific detail as to when the community were invited to provide views. Provides useful link to the consultation document that you will need to submit at the next stage.	Detail will be provided in the Consultation Statement
29	6.14	Plan should show the public right of way referred to in this paragraph	Agreed – change made
30	SA1	Policy and supporting text – more explanation required as to why 1.5ha required for cemetery extension – is this calculated burial space plus additional parking? If the 1.5ha is justified then bullet point 1 in policy should include specific reference to this requirement. You need to explain why a wildlife survey is required what is the evidence which suggests that it will be needed? Rather than wording in the negative, we would expect to see opportunities taken to encourage or support wildlife .	More evidence has been collected and included.  Agreed. Reference to the need for a wildlife survey has been removed.
31	Map	Suggest show land where planning permission already granted. Add named to each school site. It needs to be obvious to anyone who does not know the area.	Agreed – change made
31	6.20	What work has been done/ discussions had with the relevant highway/public rights of way people to confirm that an off-road cycle link is achievable? This should be stated.	Further consultation with landowner has demonstrated that a cycleway is not possible. Reference to it will be removed.
32	SA2	Bullet points 2 and 3 are not enforceable as written as the footpath is not likely to be within the ownership or control of the developer of the site. What is required is contributions towards the upgrade of the footpath.	Agreed – change made
33	6.25	Reference to access and possible junction improvements should have been considered already in consultation with the highway authority. Reference should be included within the text to the outcome of these discussions.	The highway authority has confirmed that, in its opinion, a solution may be needed but this will depend on the nature of any proposed scheme. Raising this in the supporting text is considered appropriate.

Page	Para/fig	SCDC Comment / Suggestion	Response and action
33	6.27	What happens if one or more of the owners of properties in St Margarets Crescent do not want to be involved? Has any attempt been made to ensure that these people are aware of this proposal?	No owners objected at the Pre-Submission Consultation stage. The policy wording has been amended to state that all affected residents would have to be in agreement. Given changes of ownership over time, it is not possible to know that everyone would be content at the time of an applicant, even if all are content at the current time.
33	6.28	Note if new residents complain about nuisance from the existing employment site Environmental Health are required to investigate. What you do not want is for business to end up closing or moving out because they are subject to continual complaints from new residents. The estate currently permits B1, B2 or B8 uses. The reference to conditions would therefore need to be ones which are a requirement of the residential scheme.	Agreed – change made
33	6.29	Is the issue no net loss of space? Have they looked at information from the latest leisure strategy. What would be the stance is the developer provided and improved playing surface which allowed for greater intensity of use but on a smaller area?	Noted. The paragraph has been revised to provide more flexibility.
33	SA3	Amendments may be required subject to answers to the matters referred to above. Same issue with public right of way as per SA2.	Agreed –changes made. There is no problem with the right of way because it is on the landowners property
36	SA4	Phasing can only be linked to infrastructure provision. It is not possible to enforce the requirement for at least 50% of the commercial floorspace to be provided prior to the completion of the residential units. It can be encouraged but that is all. Employment floorspace should be restricted to B1 on the basis that these types of uses are compatible with residential uses. What discussion/ agreement and viability testing has been done with regard to new pedestrian crossing? What if any phasing issues are there in relation to the habitats mitigation area – is public access something that is encouraged as part of this scheme.	Disagree. Phasing does not have to be linked to infrastructure provision and there are examples of permissions elsewhere by the same promoter where this has been the case. Pedestrian crossings discussed as part of Tesco application so should be feasible. Access to mitigation area to be discussed with EDF in due course as public access is part of the scheme once it is established.
<b>Section 7</b>			
38	IN1	What if any discussions have been held with SCDC re provision of new beach huts. Proposals must have a realistic prospect of being provided within the plan period if they are to be included in the document. It is unclear who would own them, maintain them etc. For the policy to be enforceable, it must be defined on a map.	SCDC has been contacted and are fully supportive. In fact the huts are due to be built in 2016. Proposals Maps will be amended.

Page	Para/fig	SCDC Comment / Suggestion	Response and action
39	IN2	This policy is very vague as is the supporting text. What is the community centre required to provide? Who is it catering for – what types of activities? None of this is specified. The minimum size of hall needs to be specified. How is the proposal to be funded? Is the housing an enabling development? are you proposing contributions from other sites? Who would run it / maintain it – including the public toilets? Is a community centre and housing for the elderly compatible? What is meant by elderly residents? Are you intending to limit by imposing an occupancy condition? Are you talking about sheltered housing where people have their own front doors but some limited communal provision and a house manager or what?	Agreed. More detail has been added.
40	IN3	Have proposals been costed?	No but this is not considered to be strictly necessary to meet the Basic Conditions. Paragraph 7.10 states that CIL funding will be used. We will add that this money will be used to help lever in grant funding.
<b>Section 8</b>			
42	LG2	Greens and verges are listed in Appendix A but they also need to be shown on a plan.	Agreed – map added
<b>Section 9</b>			
43	Photos	You will need to check with data protection but I would question whether or not vehicle licence plates need to be made unreadable	Agreed – change made
43	general	When talking about footpaths and cycle paths it is always preferable to show them on a map base. It is then possible to work out where the missing links are and where you might want to look to invest eg your housing allocations.	Noted. The relevant ones have been added to the site allocation maps SA1-SA4.
45	TM2	It is to be hoped that discussions have already been held with the relevant highway authority to identify what the specific and cumulative impact of your proposals is anticipated to be on these junctions. This is a potential infrastructure constraint against which new housing development could be phased.	This policy was agreed with Suffolk County Council
46	TM3	Questions to consider – does the parking provision match that required by SCC guidance – if so why not just refer to that in the policy. If it is different what is the evidence which sits behind the new figures which provide the justification. There are follow up questions – will the Town Council encourage SCDC to impose a condition on any residential development removing permitted development right re conversion of garage to residential accommodation. Thinking about design and layout are you going to end up with new developments which are dominated by hard parking areas – what impact on the street scene? Are there other on-street parking issues which cause a problem at the moment eg deliveries. What if anything is being done or looked at to address these. It may be that the plan needs to say something to the effect that other measures are being investigated within the relevant authority eg road traffic orders, provision of double yellow lines etc which the NP would not pick up.	Suffolk County Council has been consulted on this policy.  Other issues are generally dealt with under traffic management in the non-land use issues section.
47	TM5	You will need to check, but if household waste recycling is a county council function then I believe it is not a matter which can be addressed through a neighbourhood plan – it is a specifically exempted matter under the regulations.	This policy was agreed with Suffolk County Council. The issue does not relate to waste itself.
<b>Section 10</b>			
<b>Section 11</b>			

Page	Para/fig	SCDC Comment / Suggestion	Response and action
52	TC1	Comment – we have recently received an update to our retail information which will be passed on once checked. It is important that the town centre “as defined on the proposals map”... What investigations have been carried out – are there any changes suggested to the town centre boundary as it currently exists?	What is proposed is what is considered to be the boundary that reflects the function of the town centre.
55	TC2	SEE COVERING NOTE What thought has been given to including access to this area by public transport / provision of taxi ranks etc; cycle parking / mobility scooters etc How far have the suggestions for the redevelopment of this area got? Is it feasible within the plan period? What discussions have been had re moving library etc.	Agreed – additional text added
56	TC3	See comments above re types of parking provision	Agreed – change made
56	TC4	Photographs of what you consider to be good examples would be useful here	Noted
58	EMP1	It is worth considering whether or not there are any particular issues with regard to the existing industrial estates. We have up to date monitoring to identify what free space might still be available and therefore what type of new provision you want to encourage.	Monitoring will largely be for the period since 2008 when wider economic conditions have masked longer term trends in demand for commercial floorspace. The risk is that additional specificity may restrict potential for employment growth.
58	EMP2	What type of facilities are envisaged? It is a bit vague. Dependent on answer could perhaps be added as a requirement to the community centre or the town centre	Agreed. Changed to be a non-policy action.
59	ACC1	Is this policy actually needed? Is touring provision the last use of the site?	Have met SCDC Estates Team which has stated that it still want some temporary accommodation of this nature for Sizewell C
60	14.3 - 5	These are issues which should/could be included as part of an expanded section on your proposals for the regeneration of the town centre. Public toilets are proposed as part of the new community centre Shelters at all bus stops – could look to use CIL contributions but also encourage public transport providers Hard surfaced area for market etc – should ideally have a site or options for sites in mind – could be a policy.	Noted but all matters in Section 14 are not explicitly part of the plan in terms of whether it meets the Basic Conditions.
60	14.6	This is a matter which you should be discussing with the highway authority. It sounds as though it could potentially be a matter for which a policy could be included.	Suffolk County Council was engaged with on this matter and it was considered to be appropriate as a non-policy action
61	14.10	If re-introduction of a rail link is an aspiration, you need to explain what discussions have been held with the relevant rail authorities to date. If it is something which is feasible in the long term but not within the plan period, then you might want to consider a policy which would restrict and development which could preclude this from happening eg someone developing on part of the likely route.	Agreed – change made. Suffolk County Council was engaged with on this matter and is supportive.
61	14.11	Parking St Margarets Crescent – you might want to think about the implications of this. If people are provided with dropped kerbs, what will be the impact on the street scene if all front gardens are put to	Agreed – change made.

Page	Para/fig	SCDC Comment / Suggestion	Response and action
		parking. What if any other alternative solutions might there be to this problem? Again you need to discuss with the highway authority.	
62	14.12	Again this should be discussed with the highway authority. Is what your are suggesting feasible? What are the mechanisms for this eg road traffic orders etc.	Suffolk County Council has provided no comments on this at Pre-Submission stage. It is an action that will need more scoping out but the purpose in the NP is to flag it up as an issue of importance to the community and to propose an action to consider it in more detail.
62	Section	Employment and Town Centre. What you are proposing here are policies relating to design. They should be included as such in the plan.	No change. The need for a policy on street furniture is considered to be excessive.

## SCC response

Date: 11<sup>th</sup> September 2015  
Enquiries to: Robert Feakes  
Tel: 01473 260454  
Email: [robert.feakes@suffolk.gov.uk](mailto:robert.feakes@suffolk.gov.uk)



Dear Mr Rayner,

### **Leiston Neighbourhood Plan**

Thank you for consulting Suffolk County Council on your draft neighbourhood plan and congratulations on your current draft, which means that Leiston is one of the most advanced neighbourhood plan-making areas in the county.

The County Council has no major overriding concerns and, further to the letter of 15<sup>th</sup> December 2014, has only a small number of suggested modifications. Given that the letter of last year provided more wide-ranging advice, this letter only covers those matters where modifications are recommended.

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### Early Education

400 dwellings would result in approximately 40 children arising. In Leiston there are 3 providers of Early Education, including 1 Day Nursery, 1 maintained nursery and 1 Childminder. These 3 providers offer 116 places and there are currently 24 spaces. Therefore, the County Council may seek CIL contributions from the District Council (and potentially, the Town Council) for in the region of £97,456 to expand provision in Leiston. This is based upon the current statutory arrangements, which require 15 hours of free provision to be available to eligible children. The Government has announced, through the Queen's Speech, that they intend to double the number of hours available to 30 hours a week, so the requirement is expected to increase significantly.

### Education

Both schools, based on current accommodation, have capacity to cope with 92 primary pupils and 80 secondary pupils respectively, which we would expect as a minimum from the development of 375 houses.

Based on current forecasts, the catchment schools (both academies), would have space in their buildings to absorb the new pupils without expansion. However, the Primary Academy may wish to regain access to some of the playing fields if these sites (and the resulting children) were to come forward.

### Emergency Planning

The Head of the Joint Emergency Planning Unit has the following comments:

Page 20 – paragraph 5.7: In 1<sup>st</sup> sentence add words 'Suffolk Joint Emergency Planning Unit' after 'Head of Emergency Planning. Amend remaining sentences in this paragraph to read:

*'Any development proposal in the Leiston area will have to be assessed by Head of Emergency Planning for its impact on existing emergency arrangements around Sizewell nuclear sites and advice will be passed to the ONR to allow them to provide a view to Suffolk Coastal District Council with respect to the safety of any new development'.*

Page 45 – paragraph 9.8: It is incorrect to state that there is a requirement to evacuate for a nuclear emergency. Amend 2<sup>nd</sup> and 3<sup>rd</sup> sentences in this paragraph to read:

*'This is particularly relevant in Leiston, given the existence of emergency plans that cover any nuclear emergency at either Sizewell nuclear site'.*

As a comment on page 63, Leiston Town Council is a member of the Sizewell Site Stakeholder Group and this is the mechanism that the community should use to engage on emergency planning issues around the Sizewell nuclear sites.

All other emergency planning content is satisfactory.

### Housing Standards

Policy H5 sets a requirement that a proportion of new dwellings must be built to the Lifetime Homes standard. Following the Housing Standards Review, the Lifetime Homes standard has been incorporated into the Building Regulations as an option standard to be applied, where appropriate and justified, through Local Plans.

As part of implementing the review and bringing the Deregulation Act 2015 into force, the Government indicated that neighbourhood plans will not be able to set the optional technical standards.<sup>1</sup>

An examiner of this Plan will require that policy H5, in its current form, be deleted. The Town Council should consider an alternative policy, in the form of encouragement for developers to voluntarily meet the higher standard, and to consider how the design of the wider built environment can meet the needs of an ageing population.

The County Council can advise on ways of doing this, if helpful.

### Property

The County Council is landowner in respect of site IN2 and part of site SA3.

In respect of each, there are various hurdles relating to the disposal of school sites and open space which would need to be overcome before they could be made available for development.

The County Council will consider a future use for the former Middle School site, given that it is being returned from the Academy Trust. If the County Council decides to dispose of the site, it will need to be satisfied that it is getting best value from the property. Clearly, income from sale of the site and reinvestment into County Council services will be a significant consideration, however, reduced financial returns might be considered if benefits are supported by a robust business case. Early discussion with the Town Council about community and neighbourhood plan aspirations for the site would be very helpful.

The inclusion of the final bullet point in Policy LG1, which would support the provision of additional community infrastructure (such as educational facilities) on designated local green spaces, is welcomed.

### Surface Water Management

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<sup>1</sup> See Hansard: <http://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2015-03-25/HCWS488/>

It is understood that there are local circumstances which lead the Town Council to put policy FL1 in place. The Town Council should consider whether this policy adds value over the existing policy framework, namely the Ministerial Statement of 18<sup>th</sup> December 2014 and resulting requirements. The Town Council should also consider whether there needs to be further consideration of the definition of development (in relation to the legal definition of development) and hence the scope of the Policy.

## Transport

The County Council has previously advised on a policy mechanism for considering the cumulative impacts of development on the Highway Network. Policy TM2 is acceptable in principle, but amendments would make for a more effective policy.

The Government's Planning Practice Guidance already requires that transport assessments take account of developments which are permitted or allocated and likely to come forward in the next three years.<sup>2</sup> The principle which is being established through this policy is that Leiston Town Council wishes for specific detailed consideration to be given to cumulative impacts on the named junctions through the Transport Assessment process of the allocated sites, as they come forward for planning permission, going beyond the requirements of the Planning Practice Guidance.

This policy will not overcome the fact that, as set out in paragraph 32 of the National Planning Policy Framework, that development can only be prevented on transport grounds when, after putting in place measures to encourage travel by sustainable modes, 'residual cumulative impacts' are 'severe'.<sup>3</sup> As explained by the Planning Practice Guidance, one of the purposes of Transport Assessments is to propose measures to mitigate the 'severe' impacts of development.<sup>4</sup>

It is possible that cumulative assessment of the impacts of the allocated sites on the named junctions will not identify an impact for which mitigation can be required of development.

The policy and supporting text should be amended to make clear that:

- The Transport Assessments accompanying development proposals in Leiston should consider their own impacts on the named junctions, along with those of the other allocated sites,
- If the cumulative impacts on the junctions are severe, the Transport Assessments should identify and propose measures to mitigate the cumulative impacts and
- The Policy does not define the full scope of Transport Assessment requirements. Other junctions are likely to require assessment, to be determined through pre-application discussions with the Highway Authority.

If cumulative severe impacts are identified, a mechanism will need to be identified for funding junction mitigation measures. If mitigation is necessary to grant planning permission, development can be required to deliver or fund the improvements through Section 106 or Section 278 agreements. If improvements are needed, but are not necessary for specific planning permissions, the intention is that contributions are collected through Community Infrastructure Levy (CIL) payments, the receipts of which are held by the District Council (75%) and Town Council (25%).

Other funding mechanisms can be considered, but the County Council does not have an identified budget for carrying out works such as these.

The following is a suggested revision to policy TM2, for discussion. Underlined means a proposed text insertion.

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<sup>2</sup> See: [http://planningguidance.planningportal.gov.uk/blog/guidance/travel-plans-transport-assessments-and-statements-in-decision-taking/transport-assessments-and-statements/#paragraph\\_014](http://planningguidance.planningportal.gov.uk/blog/guidance/travel-plans-transport-assessments-and-statements-in-decision-taking/transport-assessments-and-statements/#paragraph_014)

<sup>3</sup> See: [http://planningguidance.planningportal.gov.uk/blog/policy/achieving-sustainable-development/delivering-sustainable-development/4-promoting-sustainable-transport/#paragraph\\_32](http://planningguidance.planningportal.gov.uk/blog/policy/achieving-sustainable-development/delivering-sustainable-development/4-promoting-sustainable-transport/#paragraph_32)

<sup>4</sup> See: [http://planningguidance.planningportal.gov.uk/blog/guidance/travel-plans-transport-assessments-and-statements-in-decision-taking/overarching-principles-on-travel-plans-transport-assessments-and-statements/#paragraph\\_005](http://planningguidance.planningportal.gov.uk/blog/guidance/travel-plans-transport-assessments-and-statements-in-decision-taking/overarching-principles-on-travel-plans-transport-assessments-and-statements/#paragraph_005)

Any development on site allocations SA1 to SA4, or on any other sites which generate sufficient movement to justify a transport assessment, will be required to consider the cumulative transport impact of all permitted and allocated development with significant movements in Leiston on the following junctions:

- Waterloo Avenue/B1122
- B1122/Cross Street
- Cross Street/Sizewell Road/High Street

Proposals which would result in a severe impact on any of these junctions, individually or cumulatively, will be refused unless the transport assessment includes proposals to mitigate cumulative impacts.

Development will be expected to make a proportionate contribution to mitigating impacts, according to what is necessary to grant planning permission.

Assessment of individual and cumulative impacts on other junctions is also expected to be required, and should be discussed with the Highway Authority as part of pre-application discussions.

The final sentence may be better located in supporting text. The whole policy should be discussed with Suffolk Coastal District Council, for their views on its application.

Yours sincerely,

Robert Feakes

Planning Officer (Policy)  
Resource Management Directorate

The next page contains an update given to Leiston Town Council by the Clerk to ensure members were ready for the Submission stage.

## **ANNEX K**

### **A REPORT ON THE LEISTON NEIGHBOURHOOD PLAN**

#### **CURRENT SITUATION AND WORK STREAMS NOVEMBER 2015**

Dear Councillor,

Firstly and most importantly I really hope you have kept your copy of the July 2015 Pre-submission Draft of our Plan. I only have one printed copy left (for my use) so I'm afraid you will have to refer to the pdf version (available on our website) if yours has gone absent without leave.

We have now finished the statutory pre-submission consultation and have collated and analysed the various responses we received. I have enclosed a copy of the Commentary on the Key Issues which briefly outlines the main representations we received. Separately, there is a table enclosed with the comments and suggestions received from SCDC. This has Chris Bowden's remarks on the actions necessary included. This will be the main workstream now to ensure that the plan is acceptable to Leiston Town Council and also compliant with the Local Plan.

The Commentary on key issues will not be put on the website while we are still deciding on amendments or evidence etc. but will be once we go to submission.

I have met with Chris Bowden and gone through everything to get a feel for what is now required. I asked him to just set out the process for members as we go forward and this is overleaf. I am involved in making the changes to the plan and responsible for preparing the Consultation Statement.

I hope to get things together so we can see the finalised plan in December and would ask that you e-mail me any comments you may have that spring to mind when browsing through the SCDC response.

Another important aspect of the plan is the work being done on the Town Centre Re-generation proposals. SCDC are a partner in this and a lot of work has been done to enlist their support and to secure the use of their land in the centre of the Town. Mrs Betson has led on this throughout the Neighbourhood planning process and has been invited, along with our Chairman, to attend a Cabinet meeting at SCDC on 17<sup>th</sup> November to brief them on the concept and the proposals. There will be a report back on this in December.

Finally, Hopkins Homes have approached me and will probably pre-empt the N Plan with a planning application. They would like to come and brief members, at an open meeting, on what they are proposing. I have set a date for 24<sup>th</sup> November for this. Alongside this, the new owner of the currant field behind St Margaret's Crescent is also pushing ahead with plans and contacted me to discuss the situation and what was in our plan. I expect him to also come and brief members on his aspirations, possibly before Christmas too. The Abbey Road site is a little bit more of a headache for the developer there ( we heard from earlier in the year) as it has a designation in the Local Plan which is subject to negotiation between SCDC, ourselves (and the developer to a certain extent) as you will see from the consultation responses.

None of these have Chinese partners that I am aware of!!

This is all very challenging and will need us to keep involved and to do our best to play within the new pitch markings as the Government (and Principal Councils) move the goalposts around.....

Regards, John

# ANNEX L

## LEISTON NEIGHBOURHOOD PLAN

### Pre-Submission Consultation (Reg. 14) comments - Commentary on Key Issues

Representations	Response	Amend plan or evidence?
<b>Historic England</b>		
Concern regarding lack of specific protection for heritage assets	Protection is provided by national and local plan policy. No requirement for NP to address this and this was not a matter raised by the community. But a policy could be added.	Potentially a new policy
<b>Suffolk County Council</b>		
Amendments required regarding Sizewell emergency procedures		Amend text
Policy H5 – overtaken by national policy. Can only have a policy encouraging higher levels.	Agree that a policy encouraging achieving higher standards is suitable.	Yes – amend Policy H5
Policy FL1 – is policy necessary and need to better define ‘development’	Policy is important to community as this is a significant issue. Amend Policy FL1 to better define ‘development’	Retain and amend Policy FL1
Policy TM2 – clarifying amendments needed		Amend Policy TM2
<b>Alsop Verrill (agents for Abbey Road)</b>		
Concern about market for speculatively-built commercial development. Wish to see provision of any employment floorspace significantly reduced although the need for some floorspace is accepted by the agents – they say 1,000m2.	<p>Agree that the evidence is limited to justify requiring employment floorspace to come forward before residential space is completed. But note that promoters would be happy with this phasing requirement, albeit with a smaller overall quantum.</p> <p>However, disagree that Policy SA4 should remove any form of employment provision. This is an existing employment allocation and whilst the site has not come forward since gaining planning permission for solely commercial uses, this has been during very challenging economic conditions. The NP needs to plan for the whole plan period so the quantum of commercial space should remain. This reflects a smaller quantum of floorspace than currently allocated which is more suitable to modern commercial needs.</p> <p>Disagree that units should be designed so that they can be used for residential purposes should there be no market for them.</p>	Amend policy SA4 to remove phasing elements
<b>Anglian Water</b>		
Concern over surface water network capacity	Should refer to the needs for SUDS provision on all site allocations	Amend Policies SA1-SA4

Representations	Response	Amend plan or evidence?
<b>Armstrong Rigg on behalf of Hopkins Homes</b>		
Consider that the housing numbers being planned for are too low	Many of these matters concern the district planning process and are not specific to Leiston. In particular, the issue of whether SCDC currently has a 5-year supply is a matter that it needs to address. The NP is making a significant contribution towards the overall Local Plan requirement for the 5 market towns and is in line with the range in the SCDC Site Allocations Issues and Options document. A factor that has also influenced the overall balance of allocations are the waste water treatment capacity issues that are also identified in the NP.	No
Comments regarding the lack of SA and the relative sustainability merits of the other allocations	The assessment in the SA in respect of the sites is considered to be robust but will be revisited in light of these and other comments.	No John, did you pick up that Hopkins said they are preparing an application for SA2 and the reserve site?
<b>Joan Girling</b>		
Concerns over access to site SA3	SCC did not raise any concerns but residents have suggested that other solutions may be better. Potentially we could look at suggesting there is more than one solution for access.	Potentially amend SA3.
Concerns over housing for elderly as part of IN2	Considers that older persons' housing does not sit well with a community use, particularly in an area where there is lots of traffic. Potentially need to consider this?	Potentially amend IN2
<b>Environment Agency</b>		
Matters related to waste water treatment capacity are not as bad as thought and there is the capacity to accommodate the growth proposed.	The second part of H1 may have the be removed.	Amend H1
<b>Mike Taylor</b>		
Plan doesn't properly address the needs of Leiston	In housing terms, the only way this could be achieved would be through identification of a rural exception site. However, no sites were made available on this basis by landowners.	No
<b>Natural England</b>		
Various matters related to Appropriate Assessment	Reflect Nick Sibbett response and recommendations	Yes
<b>Pigeon Investments</b>		
Concern that Policy H2 may not be flexible enough to address changing needs over the lifetime of the NP	Agree that some flexibility should be built in as suggested by Pigeon.	Amend H2

Representations	Response	Amend plan or evidence?
Policy SA3 and the provision of playing field space. Concern that the policy lacks flexibility.	We could look at more flexible wording. But others have suggested that this land is publicly owned and that reduction of space would be resisted (Bill Howard).	Potentially amend SA3
<b>Rosemary Rose</b>		
Concerns about inaccuracies in Policy SA4	Nothing significant, amendments can be made	Yes
<b>Various</b>		
Have raised the potential to have a community orchard	We could look at this but we would need a location. Is there one?	Potentially

**ANNEX M LETTER FROM SUFFOLK COASTAL DISTRICT COUNCIL REGARDING TOWN CENTRE SCHEME**

## Suffolk Coastal District Council

Melton Hill, Woodbridge, Suffolk IP12 1AU  
Tel: (01394) 383789  
Fax: (01394) 385100  
Minicom: (01394) 444211  
DX: Woodbridge 41400  
Website: [www.suffolkcoastal.gov.uk](http://www.suffolkcoastal.gov.uk)



Mr John Rayner  
Town Clerk  
Leiston Town Council

Please ask for: Hilary Hanslip  
Direct Dial: (01394) 444761  
E-mail address: [hilary.hanslip@suffolk.gov.uk](mailto:hilary.hanslip@suffolk.gov.uk)  
Our Ref: HH/LNP  
Your Ref:

18<sup>th</sup> March 2016

EMAIL ONLY

Dear John,

**Re: LEISTON NEIGHBOURHOOD PLAN (Prior Discussion) REG 16 – SUBMISSION STAGE**

I have previously confirmed receipt of the Leiston Neighbourhood Plan Reg 16 submission documents.

At this stage in the process, the role of the Local Planning Authority (SCDC) is to check that the submitted proposal complies with all relevant legislation. If the LPA finds that the plan or order meets the legal requirements it:

- Publishes the proposal for a minimum of 6 weeks and invites representations;
- Notifies the consultation bodies referred to in the consultation statement; and
- Appoints an Independent examiner (with the agreement of the qualifying body (LTC))

The associated guidance recommends that documents are discussed with the Local Planning Authority prior to submission:

*"A local planning authority should provide constructive comments on the emerging neighbourhood plan or Order proposal prior to submission and discuss the contents of any supporting documents, including the basic conditions statement. If a local planning authority considers that a draft neighbourhood plan or Order may fall short of meeting one or more of the basic conditions they should discuss their concerns with the qualifying body in order that these can be considered before the draft neighbourhood plan or Order is formally submitted to the local planning authority"*

Whilst I am generally satisfied that the documents go a long way towards meeting the necessary legal requirements, there are a number of matters which the Council would wish to see addressed ahead of representations being sought. I am therefore using this opportunity to provide constructive comment in accordance with guidance. The Leiston Neighbourhood Plan is the first comprehensive neighbourhood plan to be produced in the district, so establishing the right level of detail necessary at this point in the process is new to us all.



Suffolk Coastal... where quality of life counts

The following comments are intended to be constructive and the changes suggested are those which the Council consider would make the plan more robust at examination stage. None of the changes would alter the substance of the plan and the policies it contains.

#### General points:

- All maps should contain an OS copyright licence no.
- All photos should be titled and source acknowledged.

#### Neighbourhood Plan Document

The NPPG states *"if the policies and proposals are to be implemented as the community intended a neighbourhood plan needs to be deliverable"*. The Council has significant concern in respect of the text and policy relating to the town centre re-generation.

In paragraph 11.13 it is stated that *"Both landowners have indicated agreement to the sale of these sites to Lelston – as represented by a Community Interest Company – for the proposed development...."*

Paragraph 11.21 states *"The feasibility of redevelopment coming forward during the plan period has been established through extensive consultation with interested parties including current landowners...Orwell Housing (regeneration partners) have confirmed that they have capacity, capability and funding available immediately to commence the residential development of the south section as soon as Suffolk Coastal District Council confirms arrangements for acquisition of their land by Lelston and District Community Partnership...."*

The information contained in these paragraphs is factually incorrect in so far as it relates to land owned by Suffolk Coastal District Council and should be amended. The Council has not committed to selling or otherwise disposing of the land in question. This would require a formal decision by the Council. That process has not progressed to the stage of putting proposals before Council Members as is clear from the discussion at the meeting held on 19<sup>th</sup> February 2016. The amount of consultation which has been undertaken with the Council as landowner has been limited to date.

That said the Council (in its wider remit) is generally supportive of the plan and would not wish to see it unnecessarily delayed. The document will after all, assuming a successful examination and referendum, be "made" by the district Council. At this point, the plan becomes part of the formal Development Plan for the Lelston part of the district.

As it stands, the Council does not want to find itself raising an objection to the submission draft plan at this stage in the process, nor to cause any further delay. To ensure that this does not happen, the Council (combined approach under its various remits) is suggesting the Town Council write a letter to Mr Andrew Jarvis, Strategic Director with a request that he provides you with written confirmation of an "in principle" support for the regeneration of the town centre as set out in neighbourhood plan policy TCP2.

The supporting text of the submission draft document should be amended to reflect the Council's stated position as set out in Mr Jarvis's response.

The Statement of Consultation will need to be updated to include this latest correspondence with Mr Jarvis and your letter and his response included in list of evidence.

It is considered that these changes would make the neighbourhood plan more credible and therefore more robust with regard to the deliverability of the town centre regeneration project. This is important in the context of the remainder of the plan (particularly the housing provision) and its credibility overall.

These suggested changes could be undertaken quite quickly (potentially a couple of weeks) and would not add unnecessary delay to the process. The Council is not suggesting that the neighbourhood plan is delayed pending the Council taking a formal decision on the long term future of this area of land. That could take months given the background work still required and the reporting process.

Linked to the above, the neighbourhood plan does not use / reference the latest retail information as provided in the 2015 Retail Capacity Refresh. I have attached a link to the document for your reference.

<http://www.suffolkcoastal.gov.uk/assets/Documents/District/Planning-policy/Local-Plan/SCDC-Retail-Capacity-Refresh-2015.pdf>

The document should include at some point a summarised list of which "saved" local plan policies will be superseded by the neighbourhood plan.

#### Consistency with other local plan documents

Sites with planning permission for housing are an important part of the district wide housing land supply. Within the Council's own Site Allocations Document and the Felixstowe Peninsula Area Action Plan appendices 3 and 4 we have a list of sites for which there is an outstanding planning permission for 5 or more units. Appendix 3 provides a list up to 31/3/2015. Appendix 4 provides a list for period 1/4/2015 – 31/12/2015. We are also showing these on the relevant inset maps. Policy SSP1 and FPP1 refer to housing sites comprising both allocations and site for which there is an extant planning permission.

For the sake of consistency it would be useful if you could also show these sites on your proposals map. This is something that we will be asking of all relevant neighbourhood plan teams, not just yourselves.

#### List of Evidence:

National Planning Practice Guidance confirms that there is no "tick box" list of evidence required for neighbourhood planning, but that proportionate, robust evidence should support the choices made and the approach taken. On that basis, I would have expected this list to include mention of the following documents:

- National Planning Policy Framework
- National Planning Practice Guidance
- Suffolk Coastal District Local Plan – Core Strategy and Development Management Policies July 2013 and associated Sustainability Appraisal Report and Habitats Regulations Assessment
- List of remaining "saved" policies from 2001 Suffolk Coastal Local Plan relevant to Leiston
- Leiston Conservation Area Appraisal
- Copies of letters from service providers and utility companies confirming the suitability or otherwise of existing infrastructure provision which will arise from the new development proposed.

- Copies of letters from statutory consultees such as Natural England, Historic England.
- Inclusion of these documents in the list provides explicit reference to the fact that they have helped inform the plan preparation and a useful a cross reference to the basic conditions statement. *Advice on drafting Basic Conditions statements suggests "clearly cross reference to any background evidence, studies or technical reports that you consider support your statement that the neighbourhood plan meets the legal requirements ... Do not leave it for the examiner to try and find the information themselves (extract How to write a basic conditions statement)."*

#### Basic Conditions Statement:

I have considered the Basic Conditions Statement against the guidance provided in the Planning Aid Documents "Approaches to writing a basic conditions statement" and "How to write a Basic conditions statement".

As a general point, I think that the statement as currently drafted underplays the contribution that the neighbourhood plan makes to development in the district and more generally to sustainable development.

I consider that the inclusion of an introductory / background section would be beneficial given the scope of issues covered in the LNP. This section could usefully reference the fact that Lelston is one of five market towns in Suffolk Coastal district and as such is expected to make a significant contribution to new housing provision as required in the Core Strategy. As a market town it provides facilities and services to a wider hinterland. The Core Strategy sets out a strategy for Lelston in policy SP24. The neighbourhood plan implements that strategy and more, given its ambitions for town centre regeneration. It does so within the context of a potential Sizewell C. This section would then act as a signpost for the additional more specific detail provided in the remainder of the document.

More specifically:

Section 2. Table 2:2 More could be made of this table in terms of setting out how each policy conforms to the NPPF and thereby contributes to the achievement of sustainable development. If anything, the table underplays the contribution the LNP makes. The following are some suggestions

Policy H1 also makes a significant contribution to the district wide housing requirement – shows clear link to strategic policies.

Site specific housing policies – these provide for more than just housing. They include improvements to public rights of way, cemetery extension; new public open space. They are more than just housing.

TM39 – could usefully add reference to the need to maintain emergency routes linked to Sizewell something unique to Lelston.

Section 4. Question whether or not reference should be included to SP30 Coast in respect of the policy for Beach Huts

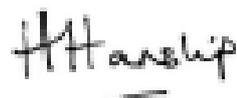
Section 5. Recommend include conclusion of the HRA to demonstrate that the basic condition has been met.

### Sustainability Appraisal Reports

Front covers should be re-printed or additional page added to confirm who was responsible for undertaking the Sustainability Appraisal work. It adds to the credibility of the document.

I hope that you find these comments useful and am grateful for your patience in respect of the time it has taken to provide them.

Regards

A handwritten signature in black ink that reads "Hilary Hanslip". The signature is written in a cursive style with a horizontal line underneath the name.

Hilary Hanslip BSc (Hons) MRTPI  
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Suffolk Coastal and Waveney District Councils