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Dear Ms Hanslip,

LEISTON NEIGHBOURHOOD PLAN 2015-2029
Submission Stage Consultation Version (Regulation 16)
LAND SOUTH OF 'THE OLD PUMP HOUSE', ABBEY ROAD, LEISTON, SUFFOLK
Residential-led, mixed-use development

Preamble

We write on behalf of our client, Limitbrook Limited with representations on the above document, and with particular regard to the above site and which is covered by Policy SA4 of the Neighbourhood Plan.

We would like to start by congratulating Leiston-cum-Sizewell Town Council and the Leiston Neighbourhood Plan Group in turning out a Neighbourhood Plan that is concise, purposeful and easy to understand. The Leiston Neighbourhood Plan is based on lots of careful thought and has come about through widespread public participation and sets out what the community would like to achieve for the town and how. Its importance and value as a town planning document is underlined further by the fact that it is based on a sustainable approach to planning and development, a key requirement of the National Planning Policy Framework and the Suffolk Coastal District Local Plan.

We believe that this is the fifth iteration of the Leiston Neighbourhood Plan and this sophisticated evolution, informed by substantial public consultation and engagement and its status as a Regulation 16 Submission Stage Consultation Version mean that it commands significant weight when planning applications are considered against it.

Whilst plan-making cannot always guarantee that allocations will be followed by planning applications, it is important that planning applications that are made adhere closely with provisions of each allocation, unless there is good reason. Our client's planning application, 16 / 0322/ OUT, validated on the 3rd April 2016, but still undetermined, has done this and we trust that it will soon be granted outline planning permission.

If Neighbourhood Planning is to have the credibility that it ought to, then planning applications that align with the provisions general and specific of a Neighbourhood Plan should be determined positively and as quickly as possible, unless material factors exist that dictate otherwise. On the other hand, planning applications that have little or no relationship with the Neighbourhood Plan for which their foundation by way of allocation is cited, should be refused planning permission and as quickly as possible.

Land at Abbey Road

In specific regard to the site to the east of Abbey Road, which is subject to Policy SA4, we have the following comments.

a. Site Primacy

It is surprising, given the emphasis on sustainable planning at national and local levels that the Abbey Road site is dealt with in connection with Policy SA4 rather than under Policy SA1. It is the only site of the four 'major' allocations with a planning history, and the only one that is not 100% green field – in fact, about 50% - 55% of the site's 4.6 hectares has previous history of industrial and other use. It is easily the most sustainable of the four sites, including with particularly important respect in terms of accessibility to a broad range of community, health, shopping, educational and employment facilities.

Under the 'Vision for Leiston 'at paragraph 3.3', the first key element of Suffolk Coastal District Local Plan Core Strategy, Policy SP24, is spelt out in full:

To consolidate and build on the role of the town, not only in relation to its own residents and rural hinterland, but also in recognition of the wider role it plays in the provision of leisure, education and employment facilities for other neighbouring market towns.

In short, residential and other development on the land east of Abbey Road can deliver this important aspect of policy better than any of the other three sites subject to current planning applications around the town.

Major'

With the foregoing, the Land at Abbey Road should be dealt with under a Revised Policy SA1 to connote its primacy as a development site in relation to the three other 'major' sites allocated.

b. Longstanding Allocation

Paragraph 6.34 should identify that the western 2.4 hectares (i.e. rather than 'part of the land' and which could be 1% or 99%) have been allocated as an employment area for 21 years, with planning permissions granted and no market interest at all.

c. Area proposed for Residential Development

Paragraph 6.44 states that;

The site is considered to be suitable to accommodate approximately 100 dwellings. This density reflects a balanced approach that seeks to make the best and most effective use of land being brought forward for development whilst respecting the setting and general location of the site on the northern edge of the settlement.

Paragraph 6.38 states that;

It is therefore considered suitable to adopt a more flexible approach to development of the site. However, it is important that the site retains some form of commercial activity and a quantum of approximately 1,000m² of commercial floorspace is considered to represent an appropriate balance. This could provide for up to 95 jobs, although this depends on the types of user and could be less.

The area of land on the detailed Illustrative Site Layout supporting outline planning application 16/0322/OUT given over to Class B1 buildings, the family-oriented public house / restaurant and ancillary car parking, delivery, turning and amenity areas is approximately 11,000 sq m (1.1 hectares).

Therefore, given the text supporting Policy SA4 and this generous allowance within the Illustrative Site Layout, Policy SA4 should state that planning permission will be granted for residential development on about 3.6 hectares of land. The 2.6 hectares stated in the Neighbourhood Plan, Regulation 16 Version seems to be a mistake.

Conclusion

Our client would be grateful if the Local Planning Authority would please consider carefully the comments made above and have them reflected in the final version of the Leiston Neighbourhood Plan.

Yours sincerely,

Malcolm Alsop for Alsop Verrill Ltd on behalf of LIMITBROOK LIMITED