

## **Matthew Payne**

---

**From:** Roses  
**Sent:** 23 July 2016 15:48  
**To:** suffolkcoastallocalplan  
**Subject:** Leiston Neighbourhood Plan

Dear Mrs Hanslip,

Thank you for notice of the publication of the Leiston Neighbourhood Plan proposal and associated documents and your invitation to offer comments, which are set out below.

Please note my request to be notified regarding Suffolk Coastal District decision under Regulation 19 of the Neighbourhood Planning Regulation 2012 whether to accept the Examiners' recommendation and future progress with the plan.

### Leiston Neighbourhood Plan (Submission Stage Consultation) July 2016

#### Comments

##### **1. Local support and participation**

It is good to note that the Neighbourhood Plan Submission Stage document has clearly taken account of many comments on the Pre-Submission Draft and reconsidered some proposals accordingly. The revised document opens up an exciting and thought-provoking view of Leiston, a measured and sensible one, fairly reflecting current challenges and opportunities, but an exciting one nevertheless, based on what appears to be sound social, economic and environmental data, to support a realistic plan for future development, falling within the town's control (eg, town centre housing) and influence (eg tourist destinations and leisure facilities) - with or without Sizewell C.

Reading it, alongside the Sustainability Appraisal and Habitats Regulations Assessment, and in tandem with the town's Appraisal (2011) and the SCDC Local Plan (2013), it is clear that Leiston has many good reasons to be positive about its future. The six points in SCDC's Strategic Policy regarding Leiston (SP24) are fully developed in the NP and set out well the town's potential for improvement in social conditions, economic growth and environmental benefits.

However it is also abundantly clear that realising Leiston's full potential, given its uniquely special character and circumstances, will require not only considerable financial investment, but also the need to communicate and engage more effectively with the majority of the local community to harness its energy, participation and support throughout this process.

##### **2. Quality of life : sustainability and affordability**

The byline to SCDC's logo is the statement "Suffolk Coastal...where quality of life counts" and this is fundamental in my view, for both current and new/prospective residents.

Together with sustainable development (also key in the overarching National Policy Planning Framework), improvement in quality of life has been my guiding principle in considering the content of the NP : critically I would add "for the greatest number of people" or, ideally, "for all".

Para 5.16 highlights that "Leiston's Town Appraisal identified that there were over 500 respondents with a member of their household seeking accommodation in Leiston over the next five years. Of this, 45% would be looking for 1-2 bed properties with a further 23% looking for 2-3 bed properties. Homes for the elderly were also specifically identified by a significant number of respondents".

Wherever potential conflicts could arise, for example between expediting house building via open market investment versus more gradual affordable housing schemes, the latter should always be emphatically preferred. This accords with the Vision for Leiston ("priority being given to affordable housing to meet local needs", *SCDC Local Plan SP24 / Leiston NP 3.3*) and the third objective in the assessment of NP against Local Plan objectives in the Sustainability Appraisal : " To ensure that housing addresses the needs of the existing community of Leiston before addressing wider needs" (*Leiston Neighbourhood Plan Sustainability Appraisal (incorporating SEA) 7.3*).

Given that the Local Plan acknowledges Leiston "contains pockets of relative deprivation", the promotion and protection of local needs must always be regarded as the priority. Taking account of existing housing developments underway in 2015 and 2016, mainly one, two and three bedroom homes made secure to buy or rent by local people should be robustly championed by a 14 year plan, focussed on retaining and improving the quality of life for existing and new residents. It is not clear how many of the new houses will be LifeTime Homes, as detailed in the Neighbourhood Plan (5.36), however the NP makes a good case for affordable, accessible house-building standards to be embedded in all Leiston's residential applications.

Given Leiston's demographic profile, building to priorities within the capacity of the town's prescribed Physical Limits Boundary dictates that larger open market houses, attractive to investors for rents and as second-homes, should properly be regarded as highly marginal commodities in Leiston.

A case in point is the outline planning application by Limitbrook Limited to build at Abbey Road. This proposes 52 out of 100 dwellings as 3 or 4+ bedroom homes. This does not reflect Leiston's housing need identified by SCDC, based on Strategic Housing Market Assessment (SHMA) data set out in the NP at 5.8 ff. or research carried out for Leiston's Town Appraisal (2011).

### **3. Water**

Regarding water management - taking together waste water capacity and security against flooding - taking into account all statements in the NP concerning constraints to housing and commercial development (eg 5.18 and 10.12) and the Local Plan, eg in relation to Leiston's Sewage Treatment Works, "some investment required to reduce impact of flooding from combined sewer overflows" (p.125) and that delivery of housing and employment within the catchment depends upon this issue being addressed, it appears that, acknowledging the point at 5.21 ("AWS has not included any expansion of [waste water] capacity at the Leiston WRC") the NP accepts that AWS has no plans to upgrade or expand capacity at the Leiston WRC and posits that it is "possible that upgrades or alternative solutions could be found" over the next 15 years. On the question of flooding the NP states : "It is vital therefore that, in bringing forward new growth, the existing issues of foul and surface water are better understood and properly taken into account. Solutions should be put in place to ensure that there is not a worsening of the situation for existing residential and commercial properties. "

Given that this is such a critical factor in taking development forward or causing it to founder , the NP hardly inspires confidence on these vital points. In fact there is only an absence of any formal technical or other explanatory document, from Anglia Water, Environment Agency or Leiston Flooding Working Group, being made public to provide more detail and reassurance that these important issues have been properly investigated or resolved at all.

What is palpably obvious is that extreme care must be accorded to thinking through the siting of housing developments. The NP provides photographic evidence of some of the vulnerable areas. I would add Abbey Road, seeing that it is one zone ear-marked for further housing growth. This busy road has been subject to increased flooding in recent years, much of this as a direct result of a reduction in natural soak-away areas as more land has become paved over with inadequate drainage. Experience shows that this situation is likely to be exacerbated by the proposed developments.

### **4. Tourism and business**

I fully support a better integrated tourism and business strategy for the town, including extending the railway to Leiston, if viable, and improving transport links along the Heritage Coast / Low Carbon Corridor. The NP should seek

to reinforce Leiston's position as a destination more effectively, before one third of the 21st Century has elapsed, by actively softening the Sizewell connection in the tourist eye (which tends to scare away many or most visitors) and pursuing the strategy of the Local Plan "to accept and embrace its tourism offer, building on its location and its industrial heritage." (ie the Garrett story). Leiston's location, on the threshold of the Coast and Heaths AONB and Suffolk's fantastic tourism opportunity, is a major card in hand, which generally is exasperatingly underplayed. A vibrant development around a 'market square', as proposed, designed to regenerate the town centre, as a retail and community hub, would be key to achieving this.

I am sceptical about the sustainability of two supermarkets in the town centre. Leiston is fortunate in having one supermarket and a small department store in the town: the Co-op's ethos dovetails well with Leiston's claim to be 'A FairTrade Town', is strongly committed to local suppliers and supports diversity in the High Street. There is scope to widen retail diversity, which the town regeneration scheme seeks to achieve, however even if supermarket provision in the town were doubled it seems likely that some small to medium retail businesses would be squeezed while modern trends in grocery shopping habits would persist - with online and doorstep delivery clocking up the food miles.

## **5. Planning and development - Abbey Road**

Faced with contributing to the SCDC market towns' total of 940 houses, the NP could better balance this obligation more equally with its commitment, under the Local Plan, to "improve the physical environment" and "protect and enhance the setting of the town."

For example, the proposal to develop the land at Abbey Road provides an opportunity to rethink policy and provide potentially more successful solutions. Of all the proposals in the Neighbourhood Plan this one has exercised me most of all. I believe it presses on many of the key concerns and essential issues for the whole town and highlights the challenges for planning authorities.

Although the current process to review and approve the Neighbourhood Plan has not been completed, Limitbrook Limited has already made an outline planning application, currently under consideration by SCDC (DC/16/1322/OUT).

It now seems reasonable to consider abandoning the Saved Policy 145 (Employment Units in the limbo of Appendix C of the Local Plan and the NP's statement at 5.19 that there has been "limited demand for employment space in Leiston over recent years") and opting pragmatically and solely for residential development (subject to the provision of used water treatment capacity, 5.18). Any housing scheme should not then be predicated on building employment units first. The NP appears to be in error regarding the planning consent, stating that the site "has had the benefit of planning permission for new industrial development" since 2008. This is not correct: only the former Garrett Works land to the north of Jewson's Building Supplies, following the existing eastern boundary fence, has consent. The greenfield site, the farmland shown in the NP to the east and south of the consented area, is subject to future planning approval. A favourable result in the NP referendum would probably assist this.

While it is encouraging to note that some aspects of the Abbey Road development proposals have been reconsidered following draft consultation, for example the location of a pub/restaurant outside the town centre on a residential site, there remain several points of major concern and objection, viz:

- Pollution attributable to noise, light and odours to residents in Abbey Road and Carr Avenue, owing to light industrial/commercial activity, additional to the existing operations at Jewsons builders yard. A major cause of concern is degraded air quality. Regarding the current planning application, I was interested to read the formal memorandum from Louise Burns, SCDC's Head of Environmental Services & Protection (<http://publicaccessdocuments.eastsuffolk.gov.uk/NorthgatePublicDocs/01170925.pdf>), which highlighted that the proposed site is likely to introduce an increased number of vehicle movements into the town with consequent impacts on air quality, compounded by the "cumulative impacts on the air quality in areas where several developments are proposed simultaneously, such as Leiston". I believe she is right to warn that "many individual schemes, deemed insignificant in themselves, contribute to a 'creeping baseline', which could ultimately lead to a significant impact on air quality in the area." This point is underscored by her citing the accredited authority recommending that "housing developments with over 10 properties should be classed as 'major' and as such,

consideration should be made to the air quality impact of such developments." A further question on the matter of pollution is how safe will it be to disturb the contaminated ground on and around the proposed development area, given the presence, according to J P Chick's report, of ground gas, asbestos and Japanese knotweed.

- What nuclear safeguards, if any, are required owing to the expanding population? The Neighbourhood Plan at 5.6 and 5.7 states that it falls to the Head of Emergency Planning as a statutory duty to offer a view on any development around the nuclear sites and that there are no constraints on development planning within the DEPZ (Detailed Emergency Planning Zone). Given the scale of planning resulting from Suffolk Coastal NPs, not only Leiston's, it would seem timely and wise to review the DEPZ and to provide more detail about the role of the Head of Emergency Planning aligned to the relevant sections of each NP.
- Impact of increased traffic and hazards to road safety leading to a heightened risk to pedestrians and road users. There is scant detail devoted to this in the NP : "This stretch of the B1122 provides reasonable visibility" (6.40) sounds terribly complacent. Two sentences at 6.41 about pedestrian linkage to the town and a pedestrian crossing is wholly inadequate. As a pedestrian, cyclist and motorist using Abbey Road most days, I am keenly aware of the risks of increasing traffic pressure on this road. Regarding the development proposals, I am in complete agreement with comments made in the submission from SCC's Development Management Engineer, Luke Mitchell (<http://publicaccessdocuments.eastsuffolk.gov.uk/NorthgatePublicDocs/01170966.pdf>), and emphatically endorse his comments regarding average vehicle speeds recorded in Abbey Road, vehicle sightlines along the frontage of the proposed development, the alignment of the carriageway and the potential risks to pedestrians and other road users in the applicant's present proposal. Increased numbers of regular private cars and light trade vehicles associated with any new build would be greatly compounded by commercial and visitor traffic to the commercial areas proposed. This extra load will add to the existing traffic around Jewsons and Appletons in Abbey Road, generating unwanted additional noise pollution and increased carbon emissions. It will also add to congestion at peak times with potential delays to traffic, backing-up along routes and junctions, north and south. Even with a pedestrian crossing sited on Abbey Road (which brings its own hazards regarding pedestrian visibility and traffic discipline) there will be an increased risk to pedestrians and road users and higher potential for accidents.
- As the NP states at 8.1, Leiston sits within and adjacent to a number of highly sensitive wildlife habitats. The NP's Sustainability Appraisal details the wealth of biodiversity within and bordering on the planning envelope, as it should, seeing that Leiston's natural riches are considerable. However some of this natural wealth is under threat of being lost forever, the key example being the Abbey Road development, should this proposal go ahead. A recent ecological survey by Mill House Ecology (<http://publicaccessdocuments.eastsuffolk.gov.uk/NorthgatePublicDocs/01162740.pdf>) recorded that much of the site within the area of the proposed development included open mosaic habitats (scrub, trees, open areas of grassland) and was therefore assessed as "a priority biodiversity habitat included in the Section 41 NERC list", however the report goes on to say that it is not considered to be of significant conservation value, owing to the plants and wildlife communities recorded. However this report has a number of spectacular omissions. The fine ash trees (not yet succumbing to die-back) in the north west corner of site overlooking Brick Kiln Lane and the Old Pump House are part of a small woodland valuable to local birds and wildlife. Cuckoos call in summer, tawny owls in winter. Linnets, redpolls, yellowhammers and finches enjoy feeding on the waste ground to the north of Jewson's site, in conjunction with the former arable land to the east. I have seen beautiful and scarce emperor moths flying above the bramble patches, close to what is proposed to become the site of blocks of apartments. Suffolk Wildlife Trust has formally objected to development on this site owing to its habitat value to reptiles, bats, hedgehogs and nesting birds : (<http://publicaccessdocuments.eastsuffolk.gov.uk/NorthgatePublicDocs/01176054.pdf>). The whole site, including the farmland strip, is a rich resource for Leiston's wildlife. The report logs some Red Listed bird species including turtle dove, starling, song thrush, skylark and (Amber Listed)

barn owl - all species which I can confirm I have seen either regularly or seasonally on the site. One Amber Listed omission, referred to as 'present in the mid 1990s', has been present on the site for the past three years at least and seen almost daily : common kestrel. Also present in summer, as well as chiffchaff, which the report notes, are willow warbler, blackcap, common and lesser whitethroat. The site is ideal warbler territory. Of greater significance is the omission of nightingale, also a Red Listed species, which has occurred and nested on the site sporadically over the past decade. It is perfect nightingale habitat. I managed to record a newly-arrived nightingale singing on the site : <https://www.youtube.com/watch?v=ln8GQo61aqU> and later beside Abbey Road as the traffic passed noisily and, in some cases, above the legal limit here of 30 mph : <https://www.youtube.com/watch?v=XF4NfKYEgbs>

The extent of the proposed development provides few corners for some of these species to continue to find a home. Their habitat will cease to exist. The site of the nightingales' nest will be paved over; the nocturnal birdsong will then give way to artificial landscaping and light pollution. Environmental Impact Assessments and ecological reports may reveal no impediment to development of any kind on the proposed site, however the UK National Ecosystem Assessment, published by DEFRA, pointed out the economic, health and social benefits provided to society and continuing economic prosperity by enjoying nature around us and seeking to achieve a better natural balance in our lives. This apparently scruffy bit of waste ground in Leiston dovetails well with the Aldhurst Farm habitat creation scheme and it would be an enlightened act to conserve and enhance it for wildlife. An approach to EDF/Suffolk Wildlife Trust/local volunteers with a view to committing the total 4.6h site to wildlife and leisure activity (allotments, orchards, woodland and scrub) would be a superb thing to do for Leiston - people and wildlife. Relocating the residential scheme to the south west of the town, as described below, and cherishing this fragment on the northern edge, would dissolve the challenges associated with the Abbey Road scheme at a stroke and achieve a better balance under the Local Plan, to "improve the physical environment" (*SCDC Local Plan p.79, SP24, (b)*) and "protect and enhance the setting of the town" (*SCDC Local Plan p.79, SP24, (f)*).

There are other options which could be considered which would provide the 'better balance' referred to in the opening sentence of point 5. above, namely :

- where identified, use existing or extended capacity to develop additional B1 type employment space at the industrial estates at Eastlands and Masterlord which already offer safer access, appropriate service roads and linked infrastructure. This would also assist in reducing concerns regarding some impacts of pollution attributable to noise, light and odours while boosting SCDC's stated aim of positioning the town in the Low Carbon Corridor stretching from Sizewell to Lowestoft ;
- the above proposal would create additional space for housing on a safer, quieter Abbey Road site or more accessible green space close to the new homes, eg allotments or a community orchard (restoring the plentiful and varied fruit trees which used to grow in this part of Leiston). This would also harmonise with the wildlife habitat scheme at Aldhurst Farm nature reserve to the east;
- **consider re-siting the residential development entirely to the south west, extending the Ashfield Drive/Lime Tree Avenue estate to the west. This not only provides scope for an attractive and safer residential area, with (unlike Abbey Road) good, established pedestrian and vehicular linkage to the town centre, growing from existing infrastructure. As well as paved footways, there is a good existing footpath network from roads running south of Waterloo Avenue towards Victory Road and, beyond the Leiston Town Athletics grounds, towards Knodishall. This proposal has the advantage of none of the associated environmental, safety and access issues present at Abbey Road, and it would also create a better balance to the town's development shape, furthest from the glare of Sizewell.**
- approach EDF/Suffolk Wildlife Trust/local volunteers with a view to committing the total 4.6h site to wildlife and leisure activity (allotments, orchards, woodland and scrub).

## 6. Conclusion

Leiston is a unique and special town within a (currently) beautiful wider rural parish offering superb countryside and seashore, teeming with some amazing wildlife. It should take pride in and care of its urban, rural and marine assets. The Neighbourhood Plan offers a great opportunity to enhance its quality and promote its character, valued by tourists to the Heritage Coast AONB and residents alike. It is vital that local economies in Suffolk have the conditions to thrive through national and regional support and local drive and initiative.

Without meaning to appear excessively high-minded or presume to preach to the professionals, I honestly feel that the planning process has a responsibility to consider the wider implications and to understand that well balanced, but vulnerable, structures are important to the bigger social pattern, influencing our sense of well being and quality of life. I believe that planning control makes a huge difference to the quality of life for all of us. So the Neighbourhood Plan and the overarching Local Plan, and its long term effects and benefits are very important to Leiston's future.

People need homes and homes need to be appropriate for the area, led by the consideration of demographic and economic circumstances, targeting need above open marketing.

Alongside these imperatives, it is vital to consider the impact of increased, albeit sustainable, development as well as the adverse effects on Leiston's possibly under-appreciated, but fine landscape, natural environment and wildlife.

If coastal Suffolk is to meet its strategic policy objectives without losing, incrementally, some of its quality, charm and character, valued by tourists to the Heritage Coast AONB and residents alike, it is vital that planning and planning applications demonstrate a genuine motive to serve the community and those most in need within that community.

Working and living sustainably is more crucial than ever. This has to be balanced with the needs of living in a fast-changing, market-driven world, but it is within our power to maintain that balance if there exists the collective will to do it. That depends upon consensus, springing from common sense and good judgement and an honest response to the common good. It should not be spurred on by an unmitigated push for growth, but by a clear and strong focus on quality of life for all.

Yours sincerely,

Timothy Rose

Click [here](#) to report this email as spam.