

## **Westleton Parish Council Response to the Modified Suffolk Coastal Local Plan**

### Policy SCLP11.9: Areas to be Protected from Development

There is an area within Westleton which is currently afforded an “Area to be Protected from Development” designation by the 1994 and 2001 Local Plans but which has been deleted in the Modified text (see annexed maps 78 and 69, Schedule of Policies Map Modifications Appendix 2 Part 2). The deletion followed the instruction of the Inspector’s letter of January 2020 to delete the “Areas to be Protected from Development” which stated: *“...there is little or no evidence to justify why each of the areas should continue to be designated, how the boundaries have been defined or what is considered to be of such significance that development should be of severely restricted, which is high planning test. Furthermore, there is no evidence of any review of these designated areas, as was suggested in earlier local plan examinations. Their retention in Policy SCLP11.9 is consequently not justified. Based on the current evidence, I consider that the Policy should be deleted. However, if the Council wishes to prepare further evidence for me to consider in justification of the retention of the designations, I am willing to agree some time for this limited exercise to be undertaken. There should be sufficient time to do this whilst the main modifications are finalised. There is however no guarantee that further evidence would persuade me to take a different view.”*

The East Suffolk District Council (ESDC) response is detailed in Document J35 (appended) and explained the Council does not plan to justify the *Areas to be Protected from Development* as it *“...would be a complex and time consuming process which the Council considers would delay the progress of the Local Plan through the examination period...At this stage, the Council consider that the most appropriate way forward is to accept the removal of the policy and the designations and make use of existing policies such as...”*.

Consequently, an area in Westleton which has benefited from specific protection from development since 1994 will lose that protection without due process.

An email response from Jim Selby (Assistant Planner, Policy and Delivery, ESDC) to a Westleton Parish Council (WPC) email on this matter included following: *“...An avenue open to Westleton Parish Council in relation to the land currently allocated as an Area to be Protected from Development in Westleton would be to, through a Neighbourhood Plan, designate areas as Local Green Space (LGS), provided the areas passed the test at paragraph 100 of the National Planning Policy Framework (NPPF)...* (The full mail is annexed to this Response).

The WPC may well undertake a Neighbourhood Plan in the future. If it does do so, in the absence of the SCLP11.9 designation for the previously protected area, the WPC will presumably seek LGS designation for it. However, the drafting and adoption process of a Neighbourhood plan is a lengthy and complex process. Moreover, there is no guarantee that the LGS designation will be given. Consequently, land which was appropriately afforded a protection designation will be denied that protection until the possibility of LGS protection is realised. This loss of protection is a consequence of a failing of the ESDC as it failed to review the designation in preparation for the Local Plan and does not plan to justify the *Areas to be Protected from Development* as it *“...would be a complex and time consuming process”* even though the Inspector explicitly noted that he will allow further time for ESDC to prepare the evidence to do so.

The WPC therefore believes that it would be unacceptable for the designation “Area to be Protected from Development” to be removed from the land identified on Westleton Map 78 because of the ESDC’s failure to undertake expected and specifically requested actions and without due process.

SCLP12.68 (previously SCLP12.69): Land West of the B1125, Westleton

The WPC maintains that this site is inappropriate for development (please see annexed Submission by the WPC to the Suffolk Coastal Local Plan Examination) and therefore welcomes the additional criteria for any development:

*An ecological assessment, including assessment of impacts on Westleton Common County Wildlife Site must accompany any planning application. Alongside any mitigation measures required, development should provide for biodiversity enhancements, in line with the characteristics of Westleton Common County Wildlife Site;*

*Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.*

The Inspector's addition of these criteria, in effect expressing pertinent concerns about the environmental impact of development of the site and questioning the ability of the sewage system to cope without significant investments, substantiates the WPC's concerns about the viability of the site.

However, the WPC also remains very concerned about the lack of pedestrian access from the site to the village. This concern is all the more relevant given that Inspector's views on housing provision for older people as noted in the new paragraphs 5.42-5.45 which specifically note that the SCLP12.68 is an *allocation which contains a specific requirement to include housing to meet the needs of older people*. With this in mind, it is apposite to note that the Inspector has appropriately retained the criteria: *Provision of pedestrian connection to existing footpaths to the village*. However, as the WPC explained in its Submission to the SCLP Examination:

- the existing footpath (to the village) is of substandard one-person width (1.05m rather than the standard 1.8m) for a few hundred yards towards the centre of the village;
- there is no scope to widen the footpath as the B1125 at that point is already substandard width;
- pedestrians would have to cross the B1125 to access the footpath which does not even start adjacent to the site;
- crossing the B1125 poses real concerns as the B1125 is a rat-run for traffic travelling to and from the A12 at Blythburgh to Leiston and Sizewell. Over a recent period of 8 months, 40,280 vehicles were recorded as exceeding 35mph and 2,805 were recorded as exceeding 45mph. The highest speeds are recorded at the entrance and exit to the village, which is where the road crossing would be placed.
- The numbers of vehicles using the B1125 will increase substantially when construction of Sizewell C starts in a few years' time.

The WPC is fully aware of the need for provision of housing for older people within the village which is why it supported the planning application on Darsham Road in Westleton for the community-led development of 20 new dwellings for local older people over 65 years of age with the change of use of the existing Vicarage into a communal social hub. That application was made by the Glebe Meadow Westleton CIC & the Church of England, Bury St Edmunds Diocese - but it was rejected by ESDC in April 2020. The WPC reiterates that the Glebe Meadows project and the planned community-led (WPC and Hastoe Housing Association) site for 10-15 affordable properties north of Westleton (west of B1125) along with SCLP12.69 land at Cherry Lee, Darsham Road, Westleton could have exceeded Westleton's new housing allocation. Moreover, the homes provided by the Glebe

Meadow site would have been permanently for local people over 65 years of age and the community-led affordable homes project is intended to provide permanently affordable homes.

In conclusion, the WPC welcomes the Inspector's additional criteria for SCLP12.68 but remains firmly opposed to development of the site as mitigating actions will not remove the environmental, infrastructure and pedestrian/resident safety concerns which are detailed in the annexed Submission by the WPC to the Suffolk Coastal local Plan Examination. Moreover, in regards to paragraphs 5.42-5.45, WPC reiterates its concern that SCLP12.68 is wholly unsuited for older people because pedestrian access to the village will require crossing the B1125 in order to access the substandard footpath and reiterates that the (ESDC rejected) Glebe Meadows community-led project to provide homes specifically for local people over the age of 65 would have more than adequately satisfied the SCLP5.8 requirement to provide housing for older people both within this Parish and in the wider local area.

**Policy SCLP 12.69 (formerly 12.70) Land at Cherry Lee, Darsham Road, Westleton**

The WPC welcomes the additional criteria for any development on this site.

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