



Planning Policy & Delivery Team
East Suffolk House
Station Road
Melton
Woodbridge IP12 1RT

26th October 2017

Dear Sirs

I write on behalf of the Letheringham Parish Council in response to the Suffolk Coastal Local Plan Review.

This response does not seek to address all the issues raised and questions posed in the Consultation Document, but is intended to comment on the proposals which directly affect the Letheringham Parish Council area generally, and the following specific development sites in particular:

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| 1. Site No: 319: Land at & west of Letheringham Lodge | Proposed 1 to 3 homes |
| 2. Site No: 767: Abbey Farm, Pit Road, Letheringham | Proposed Mixed Use |
| 3. Site No: 1052: Land at the Street / Park Road | Proposed 169 homes |

1. Methodology

Our initial concern relates to the process employed to identify potential development sites. It is appreciated that SCDC are under pressure to complete a detailed plan, but it appears that the proposed development sites, and certainly those directly relating to Letheringham, are simply old applications that have previously been refused for good reason.

In trawling the archives and including previously rejected applications, it does not appear that any, or any adequate, enquiries have been made regarding the original application nor the party responsible for making it.

For example, the application for site 319 was made by the owner at the time, and was opposed by the occupants of Letheringham Lodge, and others. The ownership of the site has now changed, and the land is now owned by the occupiers of Letheringham Lodge, who opposed the original development plan. Unsurprisingly, they are not intending to undertake development on that site at all, and have not been contacted by SCDC prior to this area of land being included in the Plan.

Similarly, site 1052 formed part of a speculative application initially submitted in 2005, which also included a parcel of land in Monewden (which appears as sites 769, 807, 808 and 809 in the Consultation Document). This historic proposal was rejected and, having spoken to one of the parties responsible for this site, it is understood that there is no current plan or intention to pursue development on that land, and any potential development would involve a very modest number of homes falling far short of the 160 quoted in your consultation document.

The fact that no enquiries or due diligence has been conducted in relation to either of these sites is of concern. Proposals regarding development generally, and the construction of a very large number of homes in comparison to the existing housing stock in particular (as arises in relation to site 1052 and potentially site 767), creates considerable anxiety to local residents. Where basic enquiries could establish that the owners of the relevant sites have no intention to pursue development either at all or to the extent suggested previously, the failure to make any such investigations prior to publication of the proposals is worrying, and suggests that this process simply involves a trawling of archives with little or no thought given to the individual sites or their suitability or impact on local communities.

The lack of care and attention given to this process and the proposed sites is further highlighted by the inclusion in the yellow area of site 1052 of a separate property, not included in the original application. I understand that the resident concerned has contacted your Office and received assurance that the inclusion of their property in the yellow area was an error. Nevertheless, the lack of care resulting in this mistake, and in the inclusion of sites generally, has and continues to cause a great deal of anxiety to local residents.

2. The Sites – A Brief Overview

2.1 Letheringham Generally

Letheringham is a small hamlet consisting of around 27 properties with a population of approximately 50 adults. It is designated as open countryside and is a dispersed settlement, located within the Deben River valley, which is a Special Landscape Area. Development is currently restricted by current Strategic Policies which would be breached if the proposed developments were to be realised.

2.2 Site 1052: Land at The Street / Park Road

This proposed site is high-quality agricultural land, situated at the centre of Letheringham (insofar as this hamlet can be considered to have a centre). The site includes a quarry, an area of importance to local wildlife, and faces the listed cottages on The Street, which themselves are adjacent to the Deben River.

2.3 Site 767: Abbey Farm

This proposed site is adjacent to the listed Church building as well as Letheringham Priory and walled garden, which is a scheduled monument. The area appears to comprise high-quality agricultural land and forms part of the Deben Valley area.

3. Concerns and Comments

3.1 Scale of Proposed Development

The immediate concern with this site, and the proposed development of it, relates to the scale in comparison with the existing housing stock in Letheringham. It is noted that the Approach to Housing Distribution and Site Allocations, contained within the Site Allocation and Area Specific Policies Development Plan Document dated January 2017, refers to a suggested range of 5 to 10 units for smaller settlements. Letheringham falls at the lower end of the 'smaller settlement' bracket and does not appear at all in the relevant tables regarding proposed housing allocations.

The parish of Letheringham comprises a total of 27 properties with an adult population of approximately 50 people. The current housing is concentrated in the area around the junction of The Street with Park Road (about 11 houses). Letheringham has no shop, pub, post office, school, surgery or any other amenities, beyond a bench, noticeboard and a defibrillator housed within a disused phone-box.

A development involving 160 homes (or indeed any beyond the most modest number) would have a dramatic and disproportionately adverse impact on the local community.

3.2 Infrastructure: Roads and General

Any development on the scale proposed would result in enormous pressure on existing resources and infrastructure. Aside from the issue of utilities and woeful broadband provision, the proposed development would result in an enormous increase in population and vehicular traffic. Letheringham has no public transport and is almost 5 miles from the nearest train station, so new residents would be compelled to rely on cars. Car use would be amplified by the absence of any local amenities, and the consequent need to use vehicles to access shops, schools, surgery, libraries and all other amenities, and this would be fortified by additional proposed developments in nearby locations such as Easton.

The effect of such increased road traffic would have a significant and adverse impact on existing residents, tourists, local businesses as well as any potential new residents. There would be consequential increases in emissions, erosion of the road surface (which is already very poor in several places) and the health and safety of road users and pedestrians.

There are three roads into and out of the village. All are single track carriageways with limited passing points that are wholly unsuited to such an increase in use. There are already issues with congestion arising from agricultural vehicles, particularly at times of harvest, and from those travelling to and from Easton Farm Park. In addition, two of the roads into and out of the village are prone to flooding and periodically become impassable.

The roads are not easily widened to accommodate any significant increase in traffic flow, and there are generally no pavements. Due to the nature of the carriageways it would be impracticable for buses to run through the village.

3.3 Infrastructure: Services etc.

As indicated above, Letheringham has no services. There is no shop, pub, school, surgery, library, recreation ground or other public amenity. The Village Hall is shared with, and located in, Easton.

Consequently, any but the most modest of developments will involve a significant and disproportionate influx of new residents, without any infrastructure to support their day to day needs.

Given the nature and demographic of the existing population, there is little inherent need for additional housing in Letheringham and, due to the isolated and un-serviced characteristics of the village, there is no real demand for additional housing in this location from those currently resident elsewhere. In the light of the factors outlined above, the proposed development sites numbered 767 and 1052 would not meet the immediate needs of the local resident population nor the longer-term future needs of the population generally, and this applies to all demographic groups from young single people, families with young or older children, or older individuals or couples seeking to downsize.

3.4 Environmental Factors

Letheringham is located adjacent to the Deben River and within the Deben Valley, which is designated as a Special Landscape Area within SSP38, as set out in the Development Plan adopted in January 2017. This Policy states that development will not be permitted in these areas where it would have a material adverse impact on the qualities of the landscape that make it special. Where development is considered acceptable, landscape improvements should be included as an integral part of the development proposal.

Site 1052 is located immediately in front of the listed Cottages on The Street and would have an immediate and detrimental impact on these properties, particularly as the site concerned is raised above the level of the Cottages and would dominate the view from them. The development would fundamentally and adversely affect the appearance and nature of this part of the village.

Moreover, along with the high quality agricultural land that would be lost in the event of development, this site contains a quarry area which is the home to a significant and diverse range of wildlife, including species that are understood to be protected and of particular importance.

Site 767 is located further from the heart of the village but adjacent to the ancient Church and Letheringham Priory and walled garden, which are a listed building and a scheduled monument respectively, as well as being of significant local and historical interest. According to a Site Appraisal Report dated August 2017, the proposed development site includes a small portion which is designated as a mineral consultation area and a further area which is liable to surface water flooding.

3.5 Capacity to Meet Housing Needs

The parish Council recognises the need for sustainable housing developments which meet the needs of the current and future populations, both locally and county-wide. This includes the provision of affordable housing, and accommodation that meets the needs of expanding populations generally.

However, for the reasons set out above, Letheringham is simply too remote, un-serviced and unable to provide even the basic amenities that would be required by any sustainable and potentially successful development.

4. Conclusion

While recognising the importance of properly identifying sites for potential development, and encouraging sustainable development in appropriate locations, the proposed sites numbered 767 and 1052 are wholly unsuitable to meet the relevant needs, would have a disproportionately adverse impact on the existing village, population, visitors, businesses and environment, and appear to have been selected without prior consideration as to their merits.

It is submitted that any cursory examination of relevant factors, including but not limited to those addressed above, compels a conclusion that these sites, and the nature of the proposed development within them, are unsustainable, inappropriate and fundamentally unsuitable to meet the housing needs that exist within the Suffolk Coastal area generally.

For these reasons, the Letheringham Parish Council strongly opposes any development on the proposed sites as suggested or at all, and requests that these locations be subject to proper and critical examination, with a view to their exclusion from any further Draft Plan published consequent to the initial consultation.

Yours faithfully

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Letheringham Parish Council

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