C - 6592 - 1703 - 1.01 - None

6592 Comment

Introduction 1.01

Respondent: mr ian buxton [1703] Agent: N/A

Full Text: In theory, this makes a great deal of sense. The problem is that we have seen so many examples of poor, not joined up,

out of character development approved by the planners that most of us are left with the only choice which is to object - in the hope that we can influence the plans. Consultation is fine but I think most people who have any interest believe it is no more than a tick in the box exercise, which can be safely ignored by planners under pressure from developers in a

few years time.

Summary: In theory, this makes a great deal of sense. The problem is that we have seen so many examples of poor, not joined up,

out of character development approved by the planners that most of us are left with the only choice which is to object - in the hope that we can influence the plans. Consultation is fine but I think most people who have any interest believe it is no more than a tick in the box exercise, which can be safely ignored by planners under pressure from developers in a

few years time.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6709 - 3749 - 1.01 - None

6709 Comment

Introduction 1.01

Respondent: Mr Robert Whitehouse [3749] Agent: N/A

Full Text: The word "sustainable" is used a lot, but it is not at all clear to me what it actually means. I think that we are all owed a

definition. We live on a peninsula and so continuous encroachment upon greenfield sites is very clearly NOT

"sustainable". It worries me greatly that future generations will not have easy access to countryside.

Summary: The word "sustainable" is used a lot, but it is not at all clear to me what it actually means. I think that we are all owed a

definition. We live on a peninsula and so continuous encroachment upon greenfield sites is very clearly NOT

"sustainable". It worries me greatly that future generations will not have easy access to countryside.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6710 - 3749 - 1.01 - None

6710 Comment

Introduction 1.01

Respondent: Mr Robert Whitehouse [3749] Agent: N/A

Full Text: The word "sustainable" is used a lot, but it is not at all clear to me what it actually means. I think that we are all owed a

definition. We live on a peninsula and so continuous encroachment upon greenfield sites is very clearly NOT

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definition. We live on a peninsula and so continuous encroachment upon greenfield sites is very clearly NOT

"sustainable". It worries me greatly that future generations will not have easy access to countryside.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7588 - 3451 - 1.09 - None

7588 Comment

Introduction 1.09

Respondent: Mr Michael Ninnmey [3451] Agent: N/A

Full Text:

In the previous response to the Consultation I requested whatever the "House Occupancy" was as E of E indicated back in 2004/5: which indicated that 50% of build was because less people in dwellings. What impact did 2008 crash have?

FPAAP

1.09

Sevenhill interchange suffers congestion already.

1.17

No reference to Health or wellbeing provision.

No reference on "Historic structures" A number at Risk.

2.02

No reference to Area pre- 1890 Walton has been erased!

2.10

By 2027! Children of many residents will have moved, because house building not meeting needs of local people, particularly low income young residents.

Para 3 Infrastructure Health & Sport. No proposal of provision.

2 11

The housing 1/4/2010 - 31/3/2015 has failed to deliver the agreed 106. Afford Housing.

FPP1

2010/13 1,003: no indication on map where? Misleading to 2027 land used.

EDD3

Alternative location for "open air market" visitor & tourist attraction.

Layout as Felix Multi plan?

Road facing Walton Hall: see Walton Green scheme:

- i) Retain rifle club, mitigate against noise on residents e.g acoustic barriers
- ii) Retain original coach house for Walton Hall!
- iii) HIDE NEW DEVELOPMENT BEHIND BOTH VALUED COMMUNITY ASSETS

FPP3 - 9

930 dwellings are to be added to rest of 1,003 plus windfall to access Felixstowe Port via jctn High road west/Garrison. This jctn has STANDING traffic back to HALF MOON Public hse NOW.

No mitigation shown on address this problem now a major concern in Walton - cum - Felixstowe is the Air Quality, (the H.R.W particularly has flood water through to the gravel.

Of increasing concern with VW rigging exhaust test.

Genera

- i) 106 agreement required provision of contribution to playspace and sports space: both of which are under provided. No indication as to how the C.I.L will make up for the shortfall and individual provision.
- ii) Community Hospital had 16 beds/no indication what extra to meet need of extra 5,000 people?
- iii) Map: fails to show position of the 1,003: The green lungs of Trimley St Martin, ST MARY, WALTON, OLD FELIXSTOWE at 2027 will only be PARKS & schools.
- iv) The buffer between settlements St Martin, ST MARY & WALTON gone.
- v) ECO-VILLAGE agreed in 2005 CS should be revised now or when 1,760 is reviewed.

4.06

The employment figures previously, have proved true?

How many "posts" are filled from outside FPAAP area? What will road traffic be by 2027? When the dual track completion date? Promise of a Ferry Quay to serve Harwich - Shotley - Felixstowe, ferry when?

No progress on supermarket provision?

No comment on underused land/council estate

Rail head in heart of Town H.R.W - Hamilton Rd, ST ANDREWS RD and GARRISON LANE.

Tourism

- i) Level footpath orwell to Deben fil in missing link of 300m? ASAP
- ii) Allow use of existing landing stages

Summary: Sevenhill interchange suffers congestion already.

Change to Plan

C - 7588 - 3451 - 1.09 - None

7588 Comment

Introduction 1.09

Appear at exam? Legal? Sound? **Duty to Cooperate? Soundness Tests** None

Not Specified Not Specified Not Specified Not Specified

Attachments:

M Ninnmey Comments.pdf

O - 6947 - 3234 - 1.17 - None

6947 Object

Introduction 1.17

Respondent: Mrs Julie Cornforth [3234] Agent: N/A

Full Text: Drive to get empty homes back in use.

EADT 10/06/2015

"New figures have revealed these are nearly 700 empty homes in part of east Suffolk at a time when the area is said to

be facing an affordable housing crisis.

SCDC has released details of the properties in the hope that landlords will seek to bring the buildings back into use. The Conservative controlled council has said that providing more affordable homes will be its top priority for the next four years and is preparing a series of ideas to tackle the problem. There has been growing concern at rising housing

prices - the average

Summary: in the district is now £232,500 - and one councillor has claimed less well-off residents were being "ethnically cleansed"

from towns and villages.

Change to Plan Conservatives - affordable housing = not doing too good so far!

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7589 - 3451 - 1.17 - None

7589 Comment

Introduction 1.17

Respondent: Mr Michael Ninnmey [3451] Agent: N/A

Full Text:

In the previous response to the Consultation I requested whatever the "House Occupancy" was as E of E indicated back in 2004/5: which indicated that 50% of build was because less people in dwellings. What impact did 2008 crash have?

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- v) ECO-VILLAGE agreed in 2005 CS should be revised now or when 1,760 is reviewed.

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Summary: No reference to Health or wellbeing provision.

No reference on "Historic structures" A number at Risk.

Change to Plan

C - 7589 - 3451 - 1.17 - None

7589 Comment

Introduction 1.17

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

M Ninnmey Comments.pdf

C - 6724 - 3778 - 1.20 - None

6724 Comment

Introduction 1.20

Respondent: mr colin lockwood [3778] N/A Agent:

Full Text: development here will be disastrous for local residents traffic levels on high rd are already too Walton green north

high worse since the new academy opened candlet rd is just as bad so a link rd will not help. Also the land is high grade agricultural land and should not be developed. It is also the last natural barrier between Felixstowe and trimley

development here will be disastrous for local residents traffic levels on high rd are already too Summary: Walton green north

high worse since the new academy opened candlet rd is just as bad so a link rd will not help. Also the land is high

grade agricultural land and should not be developed. It is also the last natural barrier between Felixstowe and trimley

Change to Plan

Legal? Sound? **Duty to Cooperate? Soundness Tests** Appear at exam?

Not Specified Not Specified Not Specified Not Specified None

C - 6638 - 2963 - 1.22 - None

6638 Comment

Introduction 1.22

Respondent: Suffolk Coastal District Council (SCDC Agent: N/A

Environmental Protection) [2963]

Full Text: I would like to comment, with regard to air quality, on the above Preferred Options Consultation as follows:

1) Felixstowe Peninsula Area Action Plan

* Land North of High Street, Walton - SHLAA Ref 451g Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* Land rear of Conway Close, Felixstowe - SHLAA Ref 502e Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

- * Land opposite Hand in Hand Public House, Trimley St. Martin SHLAA Ref 451b Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.
- * Land off Howlett Way, Trimely St. Martin SHLAA Ref 451d and 451c Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with both of these sites.
- * Land South of Thurmans Lane, Trimley St. Mary SHLAA Ref 383f and 451f Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with both of these sites.

* Employment

Land at Haven Exchange

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

2) Site Allocations & Area Specific Policies Development Plan Document

* SSP10 - Garden Square, Rendlesham

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* SSP11 - 3-33 Suffolk Drive, Rendlesham

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* SSP22 - Bentwaters Park, Rendlesham

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* SSP 31 - Snape Maltings

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

Other comments

With regard to the Neighbourhood Plans for Woodbridge, Kesgrave and Leiston (and any others in the pipeline), we have particular concerns about developments with the potential to impact upon the volume and/or types of vehicular traffic at the Woodbridge Air Quality Management Area.

C - 6638 - 2963 - 1.22 - None

6638 Comment

Introduction 1.22

It is sometimes difficult to convey to developers the importance of AQ impacts in respect of developments which may be, (by their own judgement) a significant distance from the Woodbridge AQMA; however, efforts to find ways of reducing the elevated levels of transport-related pollutants at this location to below the levels required by the EU Air Quality Directive (and UK regulations) have consistently failed to produce the required improvements in the 10 years or so since this AQMA was declared. This failure could result in financial penalties to the UK government from the EU. We are assured that any such penalties will be passed on to LAs with "failing" AQMAs in their districts. Consequently, we need to leave no stone un-turned in our examination of any proposed larger scale development (whether housing or otherwise) which has the potential to increase vehicle traffic at the existing Woodbridge Junction AQMA is consequently a matter of serious concern. Any such scheme must be accompanied by technical and robust modelling to predict the impact on traffic at this AQMA, accompanied by and assessment of the possible methods of mitigating those impacts.

The same general comments apply to some areas where our modelling/sampling indicates AQ thresholds are under pressure (but not yet breached) from transport-related sources.

Summary:

It is sometimes difficult to convey to developers the importance of AQ impacts in respect of developments which may be, (by their own judgement) a significant distance from the Woodbridge AQMA; efforts to find ways of reducing the elevated levels of transport-related pollutants at this location to below the levels required by the EU Air Quality Directive have consistently failed to produce the required improvements since this AQMA was declared, which could result in financial penalties to the UK which are passed on to LAs with "failing" AQMAs

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7394 - 3883 - 1.23 - None

7394 Object

Introduction 1.23

Respondent: mr r modrzynski [3883] Agent: N/A

Full Text:

I would like to make the following comments particularly regarding the Sustainability Appraisal (SA) for the developments in Trimley St Martin (TStM) in particular but numbers of the comments also apply to sections throughout the plan for the peninsula.

The plan has many uses of the word 'likely', in my opinion and I believe in the opinion of the 'reasonable person, disingenuously.

For example to REDUCE greenhouse gases, REDUCE waste, REDUCE effects of traffic, INCREASE air quality. The process of building, occupying and maintaining these houses and sites can only INCREASE greenhouse gases, waste generation, the amount of traffic as well as many of the other factors and DECREASE air quality and wildlife habitats. The word 'likely' is completely misleading.

I would suggest that there must be some quantitative data available to demonstrate, per house occupant and/or house the lifetime environmental effects in terms of greenhouse gases, air pollution, water and waste usage etc and that this information should have been included in the plan. This would allow a quantitative assessment and avoid such nebulous terms as 'likely'.

I find the criteria on page 15 FPAAP difficult to correlate with the scoring system guidance given on pages 10 - 12. The scoring often seems to result in a favourable outcome whereas any reasonable person could not fail to see some of the glaringly obvious and significant negative effects. Many of these scores seem to have no factual bases with little or no factual information to substantiate them, see following comments.

In terms of the scoring, the criteria look to positive or negative changes. In doing so I am struggling to understand the purpose of a 0 score, it has little basis although I understand what it is trying to show. If one had a neutral question i.e. what is the affect on air quality it could improve, reduce or stay the same. One cannot have a neutral effect on a positive or negatively based question. I wrote assessments for many years.

From page 36 onwards:

Scores on SA given in brackets () where appropriate.

1. (0) IMPROVE health, local GPs are operating with reduced staff and certainly the Grove surgery has been operating phone appointments for some months due to lack of resources. Increasing population numbers cannot possibly increase without large scale investment and even more significantly the ability to recruit and retain staff to cope; this score and must surely be -ve

TStM primary school as I understand it, would not have anywhere near the capacity to deal with an approximate doubling of the village population. In addition it is stated that developments are in walking distance of the school. In my experience the road outside the school becomes lined with dozens of cars which makes for traffic jams if one is unfortunate to have to go that direction at peak times. Evidence would show that many people use there cars to access the school, usually or depending on the weather, regardless of distance which may be due to a number of factors. The considerable distance from the Howlett Way development, with no access along the main road, would clearly give rise to additional traffic. There would also be a need to cross the now much busier Howlett Way road to use existing footpaths, an even longer walk. I therefore see a considerable increase in road traffic along minor roads increasing negative impacts and increasing the potential for accidents.

This also negatively affects air quality and quality of life.

- - ve

- 2. Education and skills. Again I see no justification for this being improved but with sufficient resources it could be maintained. One may educate a larger number to the same level but without extra resources/new training systems no improvement would seem possible. With numbers of 6th form age people using the facilities in Ipswich, which also has vocational training, one would expect the usage of private and public transport to increase proportionately.
- 3. Reduce crime and ASB. The doubling in size of the village with current and potentially falling Police numbers as well as unknowns regarding populations cannot give a reduction. I see no justification regarding how a reduction may be achieved and in fact reduced enforcement (possibly per capita) and a 'change' in the character of the village I would suggest an increase in total negative incidents, even if the per capita rate is maintained.
- 4. Reduce poverty, no effect
- 5. Improve access to key services. As it is stated no new key services will be created this should be -ve
- 6. Employment, with the small number of temporary jobs which 'may' be created it hardly constitutes much of a benefit to the community, certainly not in comparison to the detriments already noted and those yet to be. Large builders tend to recruit form a large area and keep certain of their own people, I would expect to see large numbers travelling considerable distances from perhaps a 30 mile radius to work on the site. Not a great benefit to the local workers and lots of car and van journeys contributing to pollution.
- 7. Meet housing requirement for all. Given increasing house prices and ever reducing numbers of people being able to afford even starter homes I doubt that any housing built on these sites will assist this aim.

O - 7394 - 3883 - 1.23 - None

7394 Object

Introduction 1.23

There also seems to be considerable deviation reported on the actual delivery of affordable housing highlighting a significant difference between planned and committed numbers and the number built. If the aim is not able to guarantee delivery what is the point of the aim. We may just end up with a larger number of 3, 4 and 5 bedroom houses to satisfy the better off and private landlords.

This also reflects on the employment criteria but will be mentioned here. There are no signs of significant growth in the Felixstowe area to justify the extent of extra housebuilding and influx of potential labour. There are several mentions of the Port but the reliance on one facility to drive employment and economic growth is an extremely risky one as well as it being dubious as to whether it will create large numbers of jobs.

One would therefore have to suggest that those that would occupy the homes planned would be travelling to other places i.e. Ipswich and beyond and possibly some using them as second homes.

The large employers i.e. BT are moving more jobs offshore and Felixstowe etc is outside the travel limits for Sizewell B (and C) so there will be no influence there.

In my opinion a great deal could be done by utilising economic and other factors to ensure SC is not just a place for the protected, nice areas to be preserved and to be used as second homes with limited positive economic benefit and the exclusion of those that want to live and work here full time.

Reducing vacant properties and enabling them to be utilised by full time inhabitants should run alongside further housing number growth.

8. (++) Improve quality of where people live and community participation. Quite frankly I am baffled by the justification for the ++ score based on the comments given.

Many acres of productive farmland will be dug up and concreted to create a village ~ twice the size which will look like a large housing estate from the A14 roundabout to Felixstowe. The separation of the two villages with demarcation made by a large visible arable area makes the village look like a village. One then sees a variety of housing before moving to following communities.

This field area a pleasure to see and be able to access, there is no possible justification of a ++ score that can be achieved by building on it.

Improvements of Rights of Way is a trivial task which only maintains what exists, in a much more suitable and fitting surrounding. If the RoW were maintained it would make this point irrelevant, it would just make it fit for purpose as it should be currently anyway. As it is Council budgets are reducing and less and less maintenance is being carried out, as such any improvement would seem somewhat temporary and irrelevant.

The plan to introduce a 'green area' to compensate for the loss of acres of greenfield is frankly preposterous, it is window dressing and irrelevant compared to the detriment.

This should be a - - ve score

9.

- 10. Air quality. This is not likely to remain stable it can only, with the building and occupation process cause it to decline.
- 11. ok
- 12. ok
- 13. Once again it is not 'likely' to increase waste, it WILL increase waste - ve
- 14. Reduce effects of traffic.

In general the building of the number of houses proposed in the Felixstowe - Trimley corridor will lead to thousands of extra traffic movements per day. Expanding a village to double its size will generate a vast amount of extra traffic from domestic usage, throughout the day, evening and night. There is also of course extra public transport assuming that it runs at times which correspond to when people wish to travel and the destinations they wish to reach. Deliveries and services vehicles etc etc.

I see that public transport is referred to several times however these services are well occupied at peak times and running extra together with traffic movements from those going to other places or that need different timings, mobility etc would lead to great difficulties on the High Roads through the villages. The peak times could have to deal with several hundred people going through the villages in either direction, together with extra public transport. The High Roads already have great difficulty due to the school collection at peak times and road side parking. This will be a terrible journey. Not to mention those on the route will be subjected to a great deal of extra traffic noise and pollution. No amount of tinkering with traffic flows is going to alleviate the problems, there is no room for road widening along enough of the route.

- 15. Reduce greenhouse gases. Energy consumption per capita may reduce due to improved building standards however TOTAL emissions will be increased significantly for the lifetime of the housing stock and the detriment of the environment. -- ve
- 16. Reduce flooding. Although a low flood risk zone reduction in absorption capability by building over greenfield is a substantial reduction in the sites capacity. No amount of mitigation will significantly change the negative effects. -/-- ve

O - 7394 - 3883 - 1.23 - None

7394 Object

Introduction 1.23

17. Wildlife conserve and ENHANCE. Again the removal of natural environment is a destruction of habitat which is totally out of keeping with the village aspect and location. -- ve

18/19. I am struggling to think of how the aspects of listed buildings will be enhanced by any sort of modern building, certainly of the type that will almost certainly be built on these sites.

The filling in of the visible gap between the Trimleys, that visible from Howlett Way is a positive detriment to the character of the villages. It turns two habitations into, at least, the appearance of one sprawling mass. A small increase in numbers perhaps in line with the proposals, current Mushroom farm development and opposite the Hand in Hand may enable much of the character to be maintained. The Larger Howlett Way development would not only be grossly more than the expected housing need but also ruin the village by ~ doubling its size.

The remaining points are already covered but to reiterate briefly, I fail to see how more houses will regenerate the town centre, extra people will do as the current ones do. So much trade will take place out of centre although somewhat of an increase may be expected.

I fail to see any justification for the ++ score in terms of employment, it appears a hopeful but baseless assessment.

In summary

Although I acknowledge all areas in the District should do their bit to enable population growth, from whichever source, it should take account of the aging population who seem to favour the Felixstowe area and build, in part, suitable housing to accommodate them.

Filling in the area off Howlett Way is the worst possible solution for numerous reasons as detailed. Smaller scale development would seem suitable and the Hand in Hand site would seem to have less downsides and helping to balance occupation of the village both sides of the High Road.

I would also suggest some the triangular section of ground to the NE going to the A14 sliproad, near the allotments might be suitable for small scale development which would be more in-keeping with the character and distinctiveness of the village.

I would hope that the scale of the negative impacts would outweigh comprehensively the positives; let the villages retain some of their heritage and allow us to remain separate and distinctive.

Summary:

The plan has many uses of the word 'likely', in my opinion, disingenuously.

For example to REDUCE greenhouse gases, REDUCE waste, REDUCE effects of traffic, INCREASE air quality. The process of building, occupying and maintaining these houses and sites can only INCREASE greenhouse gases, waste generation, the amount of traffic as well as many of the other factors and DECREASE air quality and wildlife habitats. The word 'likely' is completely misleading.

The scoring often seems to result in a favourable outcome whereas any reasonable person could not fail to see some of the glaringly obvious and significant negative effects.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 6711 - 3749 - 1.27 - None

6711 Comment

Introduction 1.27

Respondent: Mr Robert Whitehouse [3749] Agent: N/A

Full Text: Many of the stated sustainability objectives (at least 1,2,5,8,11,14,15,17,19) are jeopardised by incremental use of

greenfield land for residential development.

Summary: Many of the stated sustainability objectives (at least 1,2,5,8,11,14,15,17,19) are jeopardised by incremental use of

greenfield land for residential development.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6910 - 3234 - 1.27 - None

6910 Object

Introduction 1.27

Respondent: Mrs Julie Cornforth [3234] Agent: N/A

Full Text: How can you believe any of the objectives on the list provided. For example, how will building 1700+ houses on Fxt

peninsula "reduce the effects of traffic on the environment or improve air quality?"

Summary: How can you believe any of the objectives on the list provided. For example, how will building 1700+ houses on Fxt

peninsula "reduce the effects of traffic on the environment or improve air quality?"

Change to Plan Answers on a postcard!

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6944 - 3234 - 1.27 - None

6944 Object

Introduction 1.27

Respondent: Mrs Julie Cornforth [3234] Agent: N/A

Full Text: Reduce the effects of traffic on the environment and improving air quality in Fxt.

Re: EADT 24/03/2015

The launch of "No More A14 Delays" held at Wherstead Park, Ips, brought together representatives from business groups and local authorities, including Suffolk Chamber of Commerce, Suffolk County Council and the New Anglia Local

Enterprise Partnership.

Delegates heard about research indicating that Suffolk's economy would be boosted by 362 million GVA (gross value added)if problems on the A14 were addressed. The campaign identifies a number of problems on the A14 from where it

enters Suffolk on the Cambridgeshire border across to Felixstowe on the coast.

"Suffolk businesses are

Summary: being held back by this urgent and growing problem" said Suffolk County Council cabinet member Graham Newman.

"Everyone who uses the A14 in our county is at an immediate disadvantage because of the delays which mean they

experience higher fuel costs."

Stephen Britt, chairman of Suffolk Chamber's transport and infrastructure board said "The A14 is a critical section of our Suffolk infrastructure with importance both locally and nationally. With this is mind Suffolk Chamber and SCC have

embarked on a campaign to raise and maintain the profile of the A14 with central government.

Change to Plan Why don't the planners listen to people that know about the A14 and don't build 1000's of houses on the Fxt peninsula

that will cause more delays on the important A14? The only road in and out of Fxt!

Is it because they don't live locally?

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7351 - 2516 - 1.28 - None

7351 Comment

Introduction 1.28

Respondent: Natural England (Sir/ Madam) [2516] Agent: N/A

Full Text: Planning consultation: Preferred Options Public Consultation

Site Allocations and Area Specific Policies; Felixstowe Peninsula Area Action Plan

Thank you for your consultation on the above which was received by Natural England on 19 October 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.

WILDLIFE AND COUNTRYSIDE ACT 1981 (AS AMENDED)

CONSERVATION OF HABITATS & SPECIES REGULATIONS 2010 (AS AMENDED)

Site Allocations and Area Specific Policies Development Plan Document

Preferred Options Consultation Document (October 2015)

Preferred Option Policy SSP1: New Housing Delivery 2015 - 2027

We note the requirement for new housing delivery to meet, as a minimum, the Core Strategy requirement for 7,900 homes over the period 2010 - 2027.

Preferred Option SSP3 - Land rear of Rose Hill, Saxmundham Road Aldeburgh

The policy allocates 3ha of land at this location for the provision of a care home plus ten residential units. The site is about 300m from Alde-Ore Estuary Special Protection Area (SPA)/Ramsar site and Alde-Ore and Butley Estuaries Special Area of Conservation (SAC). The avoidance of strategic housing proposals at Martlesham and at Felixstowe Peninsula within 1km of the Deben Estuary and

Orwell Estuary respectively has been proposed as mitigation in part for adverse effects arising from increased recreational disturbance. Preferred Option SSP3 is within 1km of the Alde-Ore Estuary and therefore we advise that it would be required to have a Habitats Regulations Assessment at the application stage.

The Preferred Option is within Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). We note the requirements for design to take account of the sensitive landscape context of the development and advise that a Landscape and Visual Assessment (LVIA) would be required at the application stage. In summary, further detailed information will be required to assess the environmental impact of the proposed policy at this location.

Preferred Option SSP18 Ransomes, Nacton Heath (around 30 hectares)

The potential development within the AONB has significant landscape and visual impacts. We note that potential mitigation is stated to include de-designation of AONB land, rationalising existing AONB boundary and/or high quality design of buildings, structures and setting to reduce landscape impacts and impacts on potential historic interests. We advise that the policy should not rely on the

boundary of the AONB being amended. For clarity, it is Natural England's statutory responsibility to determine the designation of AONBs or to review existing AONB boundaries. For further information, please see following a link to our Designations Strategy:

http://publications.naturalengland.org.uk/publication/2647412.

However, we support the proposal for a development brief to be prepared by the District Council toprovide detailed planning guidance for the whole area, covering both the former employment allocation and the AONB element to allow for a more flexible approach to be progressed.

Preferred Option SSP30 Visitor Management - Deben Estuary

We agree with the policy to prevent increased recreational disturbance of Deben Estuary by preventing any additional car parking provision within a 1km distance of the estuary and by requiring proposed improvements to existing access points which would result in an increased level of recreational activity on the estuary to demonstrate that they will not result in any "significant effect" either on their own or in combination with other uses.

Preferred Option SSP31 Snape Maltings (replaces policy AP166)

The policy promotes the use of Snape Maltings for arts, recreation, and tourism-related uses. Snape Maltings is within Suffolk Coast and Heaths AONB and is adjacent to Alde-Ore Estuary SPA/Ramsar site and Alde-Ore and Butley Estuaries SAC. Proposals at this location will be required to demonstrate that they will not have an adverse impact on the protected landscape and designated sites and may require a Habitats Regulations Assessment and/or LVIA at application stage.

Habitats Regulations Assessment

We agree with the screening exercise carried out by the HRA that Preferred Options SSP3 (Land rear of Rose Hill, Saxmundham Road Aldeburgh) and SSP31 (Snape Maltings) are likely to have a significant effect on internationally designated sites. We note that the HRA advises that a study of existing visitor disturbance to birds, looking at the amount and origin of visitor activity as well as the birds' response is required for the vicinity of Snape Maltings; we agree

C - 7351 - 2516 - 1.28 - None

7351 Comment

Introduction 1.28

with the requirement for further evidence to inform a detailed assessment of this option.

We agree with the conclusion of the HRA (see section 5.1.1) which states that 'Site Allocation Document as a standalone document is likely to have a significant effect upon Alde-Ore Estuary European sites, with Preferred Policies SSP3 (land to the rear of Rose Hill, Saxmundham Road, Aldeburgh) and SSP31 (Snape Maltings) likely to have a significant effect by causing an increase in

disturbance to SPA-qualifying birds using the estuary'. However, we are unable to conclude no adverse effect on integrity of European sites from the subsequent statement that 'For both policies, further information and / or study might be able to inform a subsequent conclusion of no adverse effect upon the integrity of the European site' as this is not definite. We advise that either a rewording of the policies and/or further detailed assessment, including potential mitigation

measures, is required to enable us to have confidence in a conclusion of no adverse effect on integrity of European sites from these Preferred Options. We would be happy to give you further advice in this respect.

We support Preferred Option SSP30 (Visitor Management - Deben Estuary) regarding proposed improvements to access points such as slipways or jetties which may result in an increased level of recreational activity on the estuary needing to demonstrate that the proposal would not result in a likely significant effect on the notified features of the international site.

We note that the HRA states that mitigation for 'in combination' effects of new housing proposed in the Suffolk Coastal Core Strategy is being taken forward (section 3.3.3). In particular, we note that a Green Infrastructure plan is being considered by Suffolk Coastal District and Ipswich Borough to address the visitor management measures. In line with our current advice, we advise that this is not

sufficient to give confidence that the required mitigation measures will be delivered. There needs to be a commitment to having a mitigation strategy in place, informed by the green infrastructure plan, ideally by the time the plan is adopted or by a specified timescale shortly after the plan is adopted.

We advise this is necessary to give certainty that the mitigation measures will be delivered to ensure the plan is compliant with the Habitats Regulations and with paragraphs 113 and 118 of the NPPF.

We therefore suggest the following rewording:

'The Council will produce a mitigation strategy by {INSERT DATE} which will specify the measures required and how these will be delivered and funded'

Felixstowe Peninsula Area Action Plan

Preferred Options Consultation Document (October 2015)

Preferred Policy FPP1: Housing

We note that the Felixstowe Peninsula AAP identifies the requirement for 1,100 new dwellings on the preferred sites outlined in the document.

Preferred Policy FPP10: Port of Felixstowe

The policy promotes and safeguards land for employment, activities and operations which support the retention, expansion and consolidation of the Port of Felixstowe and the jobs associated with the Port. The expansion of the Port may have an impact on internationally designated sites. Please see our comments in Habitats Regulations Assessment below.

Preferred Policy FPP18: Felixstowe Ferry and Golf Course

We note that public access along the sea wall is to be retained within this area to ensure that sustainable links and connections are provided to maintain the unique character of the community and reduce the dominance of the motor car in this area. Please see our comments on England Coast Path below.

Preferred Policy FPP22: Martello Park to Landguard

We support the requirement for any future redevelopment of the port in this area to be carefully considered with the Landguard Partnership to ensure that the favourable condition of Landguard Common Site of Special Scientific Interest (SSSI) is maintained.

Preferred Policy FPP25: Access to the countryside

We support the policy which states that proposals which provide for the provision of green infrastructure in the Felixstowe Peninsula will be encouraged where these are well related to existing communities, offer good accessibility, connected to existing provision and provide alternative and accessible natural green space opportunities. We agree that proposals for new residential development in the Felixstowe Peninsula will be required to make provision of accessible natural green spaces as agreed by the District Council in conjunction with Natural England.

Habitats Regulations Assessment

We agree with the screening of the HRA which identified that Preferred Policy FPP10: (Port of Felixstowe) may have a likely significant effect on Stour and Orwell Estuaries SPA/Ramsar site as it stands. We agree with the conclusions of the HRA (see section 5.1.3) that the policy needs rewording to include a requirement for a Habitats Regulation Assessment to be provided in connection with proposals for expansion of Port of Felixstowe. We would be happy to give you

C - 7351 - 2516 - 1.28 - None

7351 Comment

Introduction 1.28

further advice in this respect.

We note that the HRA states that mitigation for 'in combination' effects of new housing proposed in the Suffolk Coastal Core Strategy is being taken forward (section 3.3.3). Please see our comments for the Site Allocations and Area Specific Policies Development Plan Document HRA above.

England Coast Path

We would appreciate the opportunity to discuss the requirements of the England Coast Path (ECP) with you in order to ensure that the requirements of the Coast Path and any mitigation measures arising from it, are clearly distinguished from any mitigation that might be required from the Council's proposed allocations. For more information on ECP, please see our website as follows:

https://www.gov.uk/government/collections/england-coast-path-improving-public-access-to-thecoast.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

Summary:

We agree with the screening of the HRA which identified that Preferred Policy FPP10: (Port of Felixstowe) may have a likely significant effect on Stour and Orwell Estuaries SPA/Ramsar site as it stands. We note that the HRA states that mitigation for 'in combination' effects of new housing proposed in the Suffolk Coastal Core Strategy is being taken forward (section 3.3.3).

Change to Plan

We agree with the conclusions of the HRA (see section 5.1.3) that the policy needs rewording to include a requirement for a Habitats Regulation Assessment to be provided in connection with proposals for expansion of Port of Felixstowe. We would be happy to give you further advice in this respect.

We note that the HRA states that mitigation for 'in combination' effects of new housing proposed in the Suffolk Coastal Core Strategy is being taken forward (section 3.3.3). In particular, we note that a Green Infrastructure plan is being considered by Suffolk Coastal District and Ipswich Borough to address the visitor management measures. In line with our current advice, we advise that this is not

sufficient to give confidence that the required mitigation measures will be delivered. There needs to be a commitment to having a mitigation strategy in place, informed by the green infrastructure plan, ideally by the time the plan is adopted or by a specified timescale shortly after the plan is adopted.

We advise this is necessary to give certainty that the mitigation measures will be delivered to ensure the plan is compliant with the Habitats Regulations and with paragraphs 113 and 118 of the NPPF.

We therefore suggest the following rewording:

'The Council will produce a mitigation strategy by {INSERT DATE} which will specify the measures required and how these will be delivered and funded'

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

168976_168977 Preferred Options Consultation Felixstowe Peninsula AAP $_$ Site Specific Allocations_Redacted.pdf

O - 6713 - 3749 - 2.01 - None

6713 Object

Vision and Objectives for Felixstowe Peninsula AAP 2.01

Respondent: Mr Robert Whitehouse [3749] Agent: N/A

Full Text: The implications of the final sentence are deeply worrying. As stated in the text, the peninsula is bounded on 4 sides.

"provided with opportunities for future growth and development" clearly cannot be a long term "sustainable" policy on

such a peninsula. This "vision" is deeply flawed.

Summary: The implications of the final sentence are deeply worrying. As stated in the text, the peninsula is bounded on 4 sides.

"provided with opportunities for future growth and development" clearly cannot be a long term "sustainable" policy on

such a peninsula. This "vision" is deeply flawed.

Change to Plan Change to final sentence;

"...(present and future) are provided with sustainable opportunities for future development that preserve or improve both

quality of life and the local environment."

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6810 - 2839 - 2.01 - None

6810 Comment

Vision and Objectives for Felixstowe Peninsula AAP 2.01

Respondent: RSPB (Jacqui Miller) [2839] Agent: N/A

Full Text: Re: Site Allocations and Area Specific Policies - Preferred Options Consultation

Thank you for consulting the RSPB regarding the Preferred Options Consultation. Please find our comments below.

Site Allocations and Area Specific Policies DPD - Preferred Options Consultation Document

Introduction

Paras. 106-107 and Policy SSP1 refer to the planning application at Adastral Park. It should be noted that at this stage, there cannot be confidence that the application and its associated green space provision will be realised, as the application is as yet undetermined. Therefore this project should not be relied upon to provide mitigation for recreational pressure on European sites through the provision of green space for the district as a whole.

SSP3 Land to the rear of Rose Hill, Saxmundham Road, Aldeburgh (SHLAA ref 608)

We have previously raised concerns (in our response of 26th February 2015 to the Issues and Options consultation) about this site regarding its proximity to the Alde-Ore Estuary SPA and Ramsar site, however, this was on the basis of 69-108 houses. A reduction to ten houses plus a care home may reduce concerns, but this restriction should be clearly worded (as an upper limit) into the resulting policy (SSP3). At present it is not clear whether the requirement is for less than ten units (as in the excerpt from the Sustainability Appraisal) or 'around ten' as in para. 2.23. As noted in the Habitats Regulations Assessment (HRA), the status and use of the access route to the estuary should be clarified, and the provision of alternative open space considered. It should be noted that, if an application is brought forward for this site, HRA at the project level will be required, and proposals for mitigation should be included in plans for any development.

We support the rejection of alternative option site 982. We note that Appendix 3 indicates that this site was rejected due to potential effects on the Alde-Ore Estuary SPA (in line with our comments). This should be recognised here.

SSP10 Land west of Garden Square Rendlesham

We support the requirement to provide open space for daily dog walking as an alternative to the more sensitive Tunstall and Rendlesham Forests (part of the Sandlings SPA).

SSP22 Bentwaters Park, Rendlesham

We note that the policy refers to the sensitivities of this site within the AONB. This policy should also recognise that Bentwaters Parks adjoins the Sandlings SPA and is in close proximity to the Alde-Ore Estuary SPA, SAC and Ramsar site. It will be necessary to consider potential effects on these designated wildlife sites when making decisions as to future activities on this site.

Section 5 - Tourism

References to Natura 2000 sites in para. 5.02 should include the Sandlings, as well as the estuaries.

Policy SSP30 proposes a restriction on public car parking within 1km of the Deben Estuary as mitigation against increases in recreational pressure resulting from the in-combination effects of housing proposals in the area. Whilst we support some restrictions on new parking provision, we suggest this should focus on provision relating to activities likely to cause most disturbance and/or locations that are most sensitive to disturbance. Seasonal restrictions could also be considered, based on the presence of sensitive species. We are also concerned that purely restricting access does not encourage responsible behaviour and enjoyment of and respect for the natural environment. We therefore recommend that consideration is given to a range of mitigation measures which could be funded through a formalised developer contributions scheme. The Council should consider those measures proposed in the Deben Estuary Plan, with examples including:

□ seasonally adapted routes including diversions if necessary
□ screening of routes
provision of information to visitors - signage, interpretation, community events to educate people about the
importance of the area and responsible visiting
□ gates preventing dogs running ahead
□ bunds and hides etc to screen birds from visitors in sensitive areas
☐ managing visitor numbers during busy periods through charging and parking restrictions
□ guidance for dog walkers and river users (e.g. through codes of conduct)
□ a wardening scheme
an ongoing visitor management plan - including provision for monitoring of impacts and review of mitigation

As noted in para. 5.05 of the Site Allocations and Area Specific Policies DPD, this approach should be complemented with provision of areas of attractive alternative green space, including areas suitable for dog walking, within individual

C - 6810 - 2839 - 2.01 - None

6810 Comment

Vision and Objectives for Felixstowe Peninsula AAP

development sites.

SSP31 Snape Maltings

While para. 5.06 refers to the conservation importance of the area within which Snape Maltings is set, the policy itself does not. We recommend that the sentence requiring that all proposals should seek to protect and enhance the special character and interest of the heritage assets should be amended to include the natural environment as well.

2.01

Section 6 Recreation and Green Infrastructure

We are pleased that the Haven Gateway Green Infrastructure Strategy (HAGGIS) has recently been updated, however, this update does not appear to be available for review. In our previous comments of 26th February 2015 on the Issues and Options consultation, we recommended that the 2011 Green Infrastructure Strategy for the Suffolk Coastal district is also updated. We commented that:

"At present the district Green Infrastructure Strategy appears focused on recreational provision. Whilst important, we consider that there is also an opportunity to expand the Strategy to include biodiversity targets. This should aim to create networks of sites of biodiversity value that 'fill the gaps' between existing green space features and sites of importance for biodiversity. Joined up networks are more functional and allow species to move between sites, helping them to adapt to the likely effects of climate change. We recommend that the currently available maps of priority habitat types are supplemented by map(s) showing designated sites (including international sites, SSSIs and County Wildlife Sites). These maps of current biodiversity resource can then be used to identify those areas which could be targeted for restoration, buffering or linkage through habitat creation or restoration."

RSPB response to Suffolk Coastal District Council Site Allocations and Area Specific Policies Issues and Options Consultation, 26th February 2015

These comments are still relevant. We also recommend that the outputs from the HAGGIS update and an update to the Suffolk Coastal Green Infrastructure Strategy should be consolidated into an SPD setting out a district-wide strategy, alongside standards for green infrastructure provision within developments. The production of an SPD would clarify and formalise requirements and ensure that there is one easily accessible set of targets and standards for the district.

Section 7 - Environment

Para. 7.03 discusses potential mitigation required as a result of increased recreational pressure. It should be clarified that this mitigation is with regard to impacts on designated European conservation sites (SPAs, SACs and Ramsar sites).

New site 3007 Saxmundham sub area (Land to south east of Blythburgh Road)

We agree with the rejection of this site due to the acknowledged potential for impact on the Minsmere-Walberswick SPA, SAC and SSSI.

New site 3024 Saxmundham sub area (Land off Aldringham Road)

We agree with the rejection of this site due to the acknowledged potential impact on the Sandlings SPA and SSSI.

Habitats Regulations Assessment for Site Allocations and Area Specific Policies DPD

Para 2.3.2 states that the assessment of the Suffolk Coastal Core Strategy found no adverse effect on the integrity of any European site. This should be clarified to state that this is dependent on the provision of mitigation to address recreational pressure as a result of housing numbers. Without such mitigation, adverse effects on integrity would result.

Para. 3.3.3 refers to a Green Infrastructure Plan under consideration by Suffolk Coastal District and Ipswich Borough. As stated in our comments above, we consider that this work should be formalised within an SPD.

Para. 3.3.3 also refers to a country park proposed as part of the Adastral Park development. As stated above, there cannot be confidence that the application and its associated green space provision will be realised, as the application is as yet undetermined.

We agree with the assessment in para. 3.4.2 that policies SSP3 Land to the rear of Rose Hill, Saxmundham Road, Aldeburgh and SSP31 Snape Maltings could have a Likely Significant Effect on European sites.

We support the conclusion in para. 3.4.15 that a visitor disturbance study is required for the Alde-Ore Estuary in order to understand possible impacts from Policy SSP31 Snape Maltings. As noted in para. 3.5.1, both the policies resulting in Likely Significant Effect relate to the Alde-Ore Estuary, hence a disturbance study could also aid assessment of SSP3 Land to rear of Rose Hill, Saxmundham Road, Aldeburgh and any future developments close to the estuary.

Para. 3.4.16 refers to the proposed restriction in new car parking around the Deben Estuary and opportunities to apply this policy to other European Sites. We recommend the approach suggested above (see comments on Section 5 -

C - 6810 - 2839 - 2.01 - None

6810 Comment

Vision and Objectives for Felixstowe Peninsula AAP

Tourism) for the Deben Estuary, and that consideration should be given to a similar scheme for other European sites (potentially including the Alde-Ore Estuary, dependant on the results of the proposed disturbance study).

2.01

We support the statement in para. 3.6.3 that the proposed development of Adastral Park will require its own project level HRA.

The discussion of SSP38 Coastal Change Management Area in Appendix 2 Screening of Individual Policies notes that the policy should emphasis that 'large lengths of the coast are European sites or related to European sites, and that Habitats Regulations Assessment is likely to apply to developments affecting these lengths of coast.' We support this recommendation

Felixstowe Peninsula Area Action Plan Preferred Options Document

Para. 2.01 refers to some of the environmental designations which illustrate the importance of the Felixstowe area. Reference to the SPA, which is an international designation, would enhance this.

There appears to be some inconsistency between the AAP and Policy SSP30 Visitor Management - Deben Estuary. Paras. 6.10 and 6.11 discuss access and parking - these should be checked for consistency with the policy. Policy FPP18 Felixstowe Ferry and Golf Course also appears inconsistent with SSP30 in that it seeks to increase parking provision. Note that we have suggested amendments to Policy SSP30 (see our comments on the Site Allocations and Area Specific Policies DPD under Section 5 - Tourism).

Para. 6.10 refers to recreational pressure on the Deben Estuary SPA. It should also be noted that The Knolls (just outside the SPA) are important for breeding little terns, and are also vulnerable to recreational pressure.

Paras. 6.28 - 6.33 could make reference to the breeding birds of the Landguard Common SSSI, particularly ground nesters, as these species are particularly sensitive to recreational disturbance.

Paras. 7.05 - 7.07 discuss the update to the HAGGIS study. Please refer to our comments on the Site Allocations and Area Specific Policies DPD under Section 6 - Recreation and Green Infrastructure above.

Policy FPP25 Access to the Countryside refers to the provision of green infrastructure. We recommend that proposals for green infrastructure which maximise biodiversity benefits should also be encouraged.

We support the rejection of New Site 3028 Land at Manor Terrace as this site is very close to the Landguard Common SSSI and its sensitive plants and breeding birds.

Habitats Regulations Assessment for Felixstowe Peninsula Area Action Plan

We support the recommendation in para. 3.4.3 that Policy FPP10 Port of Felixstowe is expanded to include reference to the potential need for HRA should developments be proposed within or to expand the Port.

We trust that these comments are helpful. If you have any queries about the comments above, please do not hesitate to contact me.

Summary:

Para. 2.01 refers to some of the environmental designations which illustrate the importance of the Felixstowe area. Reference to the SPA, which is an international designation, would enhance this.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

RSPB response to preferred options consultation 231115.pdf

C - 7063 - 2722 - 2.01 - None

7063 Comment

Vision and Objectives for Felixstowe Peninsula AAP 2.01

Respondent: Levington & Stratton Hall Parish Council (Mrs Agent: N/A

Marian Rose) [2722]

Full Text: Preferred Options public consultation; the Site Allocations and Area Specific Policies; & Felixstowe Peninsula Area

Action Plan

The Parish Council has previously participated over the past 12 years in every stage of the advancement of the two planning documents recently issued for public consultation by Suffolk Coastal District Council. It is therefore aware of much of the content carried forward from these previous consultations documents.

Following the Parish Council meeting on 4 November, when the latest planning documents were discussed, the following comments were made for your consideration:

- Site Allocations and Area Specifics Policies Development Plan Document Preferred Options Consultation Document -October 2015
- i. It is noted that Page 58 Strategic Employment Site refers to the future development of Ransomes, Nacton Heath. This would require the reversion of AONB land to developable land. Whilst we can see the sense of this, as small areas of AONB are separated from the main area by an A road, it does extend the build environment of Ipswich eastwards, although it is bounded, at present, by the A12/A14 road.
- ii. Page 96 -Tourism -refers to the Suffolk Showground. More specifically, it confirms the site as an events venue, but allows for an "enabling development" of up to 300 new homes. It is further stated that further housing will be agreed within the site.

These will be residential developments and extend the build environment of Ipswich eastwards although, again, at present, bounded by the A12/A14 road.

- iii. Page 98 onwards refers to Recreation and Green Infrastructure [Core Strategy Objective 14]. It particularly refers to the importance of access to green space and green corridors for wildlife.
- iv. Page 108 Built Environment Areas to be Protected from Development. This reinforces the status and protection afforded by the Hierarchy of Settlements, including Levington and Stratton Hall, which cannot sustain development. If developments should ever be favoured, whether residential or employment, they would seriously jeopardise this carefully balanced hierarchy of communities.
- v. We therefore see any developments eastwards from Ipswich, beyond the A12/A14 road, as a risk to the valued green space between Ipswich and Felixstowe.
- vi. We welcome the comments on Page 71 Levington Park SSP 14.
- vii. Page 104 -Natural Environment AONB refers to Special Landscape Areas, including many river valleys, including Historic Parkland [see also page 103]. We cannot see reference to the River Orwell in this section. If our observation is correct, shouldn't this River be included in this section?
- viii. We note the need for mitigation under page 101 Environment -need for visitor management.
- 2. Felixstowe Peninsula Area Action Plan [AAPJ Preferred Options Consultation Document October 2015
- i. There are many references to the natural environment and Sections 1.28,
- 1.29. and 1.31. stress the importance of protection.

Page 76 -Environment - Access to the Countryside - also makes strong reference to environmental protection.

There is much reference to mitigation, without any information on what the mitigation will be. It is essential that details are provided , and their effectiveness assessed, before developments take place.

- ii. We welcome the sites in and around Marston Hall being discounted from development.
- iii. We note the residential developments to the western side of the AAP in Trimley St Martin and Kirton.
- 3. Summary

The Parish Council welcomes the opportunity to once again comment at this stage of the planning process and, drawn from the commentary, makes the following remarks:

i. We firmly maintain the importance of retaining a clear separation between eastern boundary of Ipswich and the western edge of the Felixstowe AAP. We sincerely hope that the proposed developments to the east of Ipswich [see 1i.

C - 7063 - 2722 - 2.01 - None

7063 Comment

Vision and Objectives for Felixstowe Peninsula AAP

and 1ii. above] and to the west of the Felixstowe AAP [see 2iii. above] do not compromise this valued area of Suffolk countryside, having a treasured mixture of agriculture and naturalness.

2.01

ii. We are aware that the planning documents represent the development intentions of the current planning period, for both residential and employment purposes.

However, we are aware that a strategic review will take place shortly and possibly is now taking place. Being mindful of what we have said in 3i. above, we trust that SCDC will protect this area from all development, including industrial. We note that the relevant area north of the A I 4 is in the Site Allocations and Area Specifics Policies Development Plan Document area, while that to the south falls in the Felixstowe AAP area. There is the usual danger of separate bodies looking only at their own area and not co-ordinating their plans. It is vital that an overall view is taken. The area south of the A14 is noteworthy as it is the hinterland to the AONB. It is worth making the point that it is not just what is in an AONB which matters but also the outside factors which may impact badly upon it.

iii. We would welcome details of the mitigation required by the environmental assessments to protect the wildlife, natural environment, communities, and fragile road infrastructure in the AONB and its hinterland [see I.viii and 2.i above].

iv. In respect of I .vii above, we would like to know why the River Orwell is not included in this section.

Summary:

We firmly maintain the importance of retaining a clear separation between eastern boundary of Ipswich and the western edge of the Felixstowe AAP. We sincerely hope that the proposed developments to the east of Ipswich and to the west of the Felixstowe AAP do not compromise this valued area of Suffolk countryside, having a treasured mixture of agriculture and naturalness.

We are aware that the planning documents represent the development intentions of the current planning period, for both residential and employment purposes.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

C - 6714 - 3749 - 2.02 - None

6714 Comment

Vision and Objectives for Felixstowe Peninsula AAP 2.02

Respondent: Mr Robert Whitehouse [3749] Agent: N/A

Full Text: The text equates growth to success. This is somewhat subjective. I would argue that a smaller, more prosperous

community is more "successful" than a larger community with higher levels of poverty and lower overall quality of life.

"Bigger" does not necessarily mean "better".

Summary: The text equates growth to success. This is somewhat subjective. I would argue that a smaller, more prosperous

community is more "successful" than a larger community with higher levels of poverty and lower overall quality of life.

"Bigger" does not necessarily mean "better".

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6764 - 3060 - 2.02 - None

6764 Comment

Vision and Objectives for Felixstowe Peninsula AAP 2.02

Respondent: Felixstowe Town Council (Mr Ash Tadjrishi) [3060] Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Preferred Options Consultation

Thank you for the opportunity to respond to the Suffolk Coastal District Council Felixstowe Peninsula Area Action Plan Preferred Options paper. The Town Council considered this matter at its meeting of 11 November 2015.

Felixstowe Town Council was pleased to welcome and endorse the Felixstowe Peninsula Area Action Plan Preferred Options, subject to the following comments:

Page 13, Para. 2.02

We recommend adding the following to the end of the final sentence of this paragraph: ", as required by the July 2013 Local Plan."

Page 24, FPP3

Remove "(for residents and visitors)" from the bottom bullet relating to appropriate parking provision.

Page 26, Para. 3.30

This paragraph has been reduced in scope from an earlier draft and no longer references the unique location this site holds as a gateway to Felixstowe. It is vital that the policy ensures that any proposals for development of this site include appropriate consideration for this gateway and the statement this makes to those arriving to Felixstowe by road.

Page 27, FPP4

Remove "and Candlet Road" from the first bullet point. Any business units for this site should be restricted to the land adjacent to the A14 Dock Spur only.

Page 27, Title of 3.39

The title should read "Land" rather than "Lane" and include Swallow Close.

Page 29, FPP5

Please include Swallow Close and refer to this site as the "Land north of Conway Close and Swallow Close" throughout.

Page 49, Para. 5.06

Given the latest available information on these sites, this paragraph should be removed.

Page 50, Inset Map

The secondary shopping frontage should continue along Bent Hill on both sides of the road. It should also include the frontage of Trinity Methodist Church on Hamilton Road for consistency. Likewise the primary shopping area shaded in green should include this same section.

Page 51, Para. 5.10

Sentence should end "other than town centre uses".

Page 51, Para. 5.12

Please amend the final two sentences to read as follows:

"The scheme was not completed between Orwell Road and Bent Hill and the AAP will seek to encourage the continuation of the Shared Space along Hamilton Road. The completion of this scheme within the town centre boundary will provide a continuous link between Hamilton Road and Bent Hill and reinforce the connections between the town centre and the sea front."

Page 54, FPP15

Please amend the first paragraph to read "Any change of use proposals in this area should seek to retain a high proportion of retail activity."

Page 68, FPP21

Correction: "The provision of beach huts will be limited to those which currently exist. Any increased provision will be directed towards other parts of the sea front (namely Felixstowe Ferry Golf Club to Cobbolds Point Preferred Policy FPP19) as appropriate."

Page 74, FPP24

The policy should open with the following opening sentence:

"The need to strengthen Felixstowe as a seaside destination is recognised."

The next sentence should read: "Holiday accommodation will be encouraged and supported"

Page 82, FP27

This should be titled FPP27 rather than FP27.

C - 6764 - 3060 - 2.02 - None

6764 Comment

Vision and Objectives for Felixstowe Peninsula AAP 2.02

Please revise the first line of text to read "Spa Gardens and Town Hall Gardens".

Appendix 7:Felixstowe, Trimley St. Mary & Trimley St. Martin Inset Map.

The Physical Limits boundary in regard to the seaward boundary should be drawn as in the 2001 Local Plan map - i.e disappear in to the sea rather than be drawn along the low water mark.

The dotted blue line denoting Proposed Tourism Areas is misleading and these areas should be marked out to define the landward extent and total area covered by those corresponding policies. Landguard peninsula should also be encapsulated whereas the line appears to end at Landguard point. As above, the lines between the areas should simply stop at the sea. The extensions of those lines into the sea can be wrongly interpreted as representing a policy as applying to an element of the sea.

The port area should be included within the Physical Limits boundary as is the case in the 2001 Local Plan map. The Physical Limits boundary in the Manor End area should include the caravan parks and Custom House, terminating at the boundary of Landguard Common.

The colouring of some of the designations on the main map are confusingly similar, notably those for the Proposed District Centre, the District Centre boundary and the revised Physical Limits boundary. Also, the use of very heavy lines at the scale of the main map is unhelpful.

Notwithstanding these observations, thank you for the opportunity to have been consulted. The Town Council looks forward to receiving information on the further development of the Area Action Plan.

Summary: Page 13, Para. 2.0

We recommend adding the following to the end of the final sentence of this paragraph: ", as required by the July 2013 Local Plan."

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

AAP Preferred Options Consultation Response.pdf

C - 7591 - 3451 - 2.02 - None

7591 Comment

Vision and Objectives for Felixstowe Peninsula AAP 2.02

Respondent: Mr Michael Ninnmey [3451] Agent: N/A

Full Text:

In the previous response to the Consultation I requested whatever the "House Occupancy" was as E of E indicated back in 2004/5: which indicated that 50% of build was because less people in dwellings. What impact did 2008 crash have?

FPAAP

1.09

Sevenhill interchange suffers congestion already.

1.17

No reference to Health or wellbeing provision.

No reference on "Historic structures" A number at Risk.

2 02

No reference to Area pre- 1890 Walton has been erased!

2.10

By 2027! Children of many residents will have moved, because house building not meeting needs of local people, particularly low income young residents.

Para 3 Infrastructure Health & Sport. No proposal of provision.

2 11

The housing 1/4/2010 - 31/3/2015 has failed to deliver the agreed 106. Afford Housing.

FDD1

2010/13 1,003: no indication on map where? Misleading to 2027 land used.

EDD3

Alternative location for "open air market" visitor & tourist attraction.

Layout as Felix Multi plan?

Road facing Walton Hall: see Walton Green scheme:

- i) Retain rifle club, mitigate against noise on residents e.g acoustic barriers
- ii) Retain original coach house for Walton Hall!
- iii) HIDE NEW DEVELOPMENT BEHIND BOTH VALUED COMMUNITY ASSETS

FPP3 - 9

930 dwellings are to be added to rest of 1,003 plus windfall to access Felixstowe Port via jctn High road west/Garrison. This jctn has STANDING traffic back to HALF MOON Public hse NOW.

No mitigation shown on address this problem now a major concern in Walton - cum - Felixstowe is the Air Quality, (the H.R.W particularly has flood water through to the gravel.

Of increasing concern with VW rigging exhaust test.

Genera

- i) 106 agreement required provision of contribution to playspace and sports space: both of which are under provided. No indication as to how the C.I.L will make up for the shortfall and individual provision.
- ii) Community Hospital had 16 beds/no indication what extra to meet need of extra 5,000 people?
- iii) Map: fails to show position of the 1,003: The green lungs of Trimley St Martin, ST MARY, WALTON, OLD FELIXSTOWE at 2027 will only be PARKS & schools.
- iv) The buffer between settlements St Martin, ST MARY & WALTON gone.
- v) ECO-VILLAGE agreed in 2005 CS should be revised now or when 1,760 is reviewed.

4.06

The employment figures previously, have proved true?

How many "posts" are filled from outside FPAAP area? What will road traffic be by 2027? When the dual track completion date? Promise of a Ferry Quay to serve Harwich - Shotley - Felixstowe, ferry when?

No progress on supermarket provision?

No comment on underused land/council estate

Rail head in heart of Town H.R.W - Hamilton Rd, ST ANDREWS RD and GARRISON LANE.

Tourism

- i) Level footpath orwell to Deben fil in missing link of 300m? ASAP
- ii) Allow use of existing landing stages

Summary: No reference to Area pre- 1890 Walton has been erased!

Change to Plan

C - 7591 - 3451 - 2.02 - None

7591 Comment

Vision and Objectives for Felixstowe Peninsula AAP 2.02

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

M Ninnmey Comments.pdf

S - 6715 - 3749 - 2.03 - None

6715 Support

Vision and Objectives for Felixstowe Peninsula AAP 2.03

Respondent: Mr Robert Whitehouse [3749] Agent: N/A

Full Text: All good

Summary: All good

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

O - 6716 - 3749 - 2.04 - None

6716 Object

Vision and Objectives for Felixstowe Peninsula AAP 2.04

Respondent: Mr Robert Whitehouse [3749] Agent: N/A

Full Text: For the same reasons previously stated. Felixstowe is at the southern end of a peninsula which is already tarmac'ed or

concreted over for 70% of it's length. Any further major residential or commercial "estates" will be detrimental to many of

the towns features described in the preceding section (2.03) which talks about "...access to the surrounding

countryside" - building on it (countryside) clearly destroys this.

Summary: For the same reasons previously stated. Felixstowe is at the southern end of a peninsula which is already tarmac'ed or

concreted over for 70% of it's length. Any further major residential or commercial "estates" will be detrimental to many of

the towns features described in the preceding section (2.03) which talks about "...access to the surrounding countryside" - building on it (countryside) clearly destroys this.

countryside - building on it (countryside) clearly destroys this

Change to Plan The Core Strategy identifies Felixstowe as a Major Centre; of sub-regional importance. Economic investment and

growth should be encouraged. Felixstowe has many brownfield sites that offer opportunities for commercial and

residential development without impacting the environment.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified Non

C - 6717 - 3749 - 2.05 - None

6717 Comment

Vision and Objectives for Felixstowe Peninsula AAP 2.05

Respondent: Mr Robert Whitehouse [3749] Agent: N/A

Full Text: "maintain their individual character"? - hardly - they are primarily just housing estates

Summary: "maintain their individual character"? - hardly - they are primarily just housing estates

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6718 - 3749 - 2.07 - None

6718 Object

Vision and Objectives for Felixstowe Peninsula AAP 2.07

Respondent: Mr Robert Whitehouse [3749] N/A Agent:

Full Text: Again, use of the word "sustainable" to support a policy that is clearly not (sustainable) on a peninsula. Also "level of

growth identified for the communities...in the Core Strategy..."

I strongly disagree with the "need" for this type of growth. - Who's need? - not mine!

Again, use of the word "sustainable" to support a policy that is clearly not (sustainable) on a peninsula. Also "level of Summary:

growth identified for the communities...in the Core Strategy...'

I strongly disagree with the "need" for this type of growth. - Who's need? - not mine!

Add sentence; Change to Plan

Land allocations will be made from within existing development boundaries.

Appear at exam? Legal? Sound? **Duty to Cooperate? Soundness Tests**

Not Specified Not Specified Not Specified Not Specified None

O - 6647 - 3234 - 2.09 - None

6647 Object

Vision and Objectives for Felixstowe Peninsula AAP 2.09

Respondent: Mrs Julie Cornforth [3234] Agent: N/A

Full Text: By 2027, having built on the best Grade 1 and 2 agricultural land in all of England, Fxt will be a district where people

won't want to live and invest because the peninsula will be gridlocked, as well as caring for others, have you tried getting a "care package" for an elderly relative - joke- As for caring for the environment, there won't be any countryside or

wildlife in the Felixstowe region to care about!

Summary: By 2027, having built on the best Grade 1 and 2 agricultural land in all of England, Fxt will be a district where people won't want to live and invest because the peninsula will be gridlocked, as well as caring for others, have you tried getting

a "care package" for an elderly relative - joke- As for caring for the environment, there won't be any countryside or

wildlife in the Felixstowe region to care about!

Change to Plan Stop wasting money making up stupid dittys!

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7592 - 3451 - 2.10 - None

7592 Comment

Vision and Objectives for Felixstowe Peninsula AAP 2.10

Respondent: Mr Michael Ninnmey [3451] Agent: N/A

Full Text:

In the previous response to the Consultation I requested whatever the "House Occupancy" was as E of E indicated back in 2004/5: which indicated that 50% of build was because less people in dwellings. What impact did 2008 crash have?

FPAAP

1.09

Sevenhill interchange suffers congestion already.

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2.02

No reference to Area pre- 1890 Walton has been erased!

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By 2027! Children of many residents will have moved, because house building not meeting needs of local people, particularly low income young residents.

Para 3 Infrastructure Health & Sport. No proposal of provision.

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Genera

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- ii) Allow use of existing landing stages

Summary: By 2027! Children of many residents will have moved, because house building not meeting needs of local people,

particularly low income young residents.

Para 3 Infrastructure Health & Sport. No proposal of provision.

Change to Plan

C - 7592 - 3451 - 2.10 - None

7592 Comment

Vision and Objectives for Felixstowe Peninsula AAP 2.10

Appear at exam?
Not Specified

Legal?
Not Specified

Sound? Not Specified **Duty to Cooperate?**Not Specified

Soundness Tests

None

Attachments:

M Ninnmey Comments.pdf

C - 6719 - 3749 - 2.11 - None

6719 Comment

Vision and Objectives for Felixstowe Peninsula AAP 2.11

Respondent: Mr Robert Whitehouse [3749] Agent: N/A

Full Text: Item 2. - The "population imbalance" will largely sort itself out within the next 10 years as the baby boomers "pass-on"

and their children inherit property etc. I accept that there is a current problem, but there may be no long-term need for

lots of cheap housing.

Summary: Item 2. - The "population imbalance" will largely sort itself out within the next 10 years as the baby boomers "pass-on"

and their children inherit property etc. I accept that there is a current problem, but there may be no long-term need for

lots of cheap housing.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

S - 6741 - 3782 - 2.11 - None

6741 Support

Vision and Objectives for Felixstowe Peninsula AAP 2.11

Respondent: Mary Wyatt [3782] Agent: N/A

Full Text: Every opportunity must be made to ensure the Academy is functioning well. At the moment many students leave

Felixstowe to attend other schools. The fact that this is so means that Felixstowe is an unattractive place to move to for

families. This has a knock on effect on the health of the town.

Summary: Every opportunity must be made to ensure the Academy is functioning well. At the moment many students leave

Felixstowe to attend other schools. The fact that this is so means that Felixstowe is an unattractive place to move to for

families. This has a knock on effect on the health of the town.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

O - 6838 - 3319 - 2.11 - None

6838 Object

Vision and Objectives for Felixstowe Peninsula AAP 2.11

Respondent: Mr Christopher Harrison [3319] Agent: N/A

Full Text: Felixstowe Peninsular Area Action Plan.

I would like to take issue with several sections of the Felixstowe Peninsular Area Action Plan mostly in connection with the development of the land in Ferry Road (OUT DC/13/3069/OUT) and Conway Close (502e).

Section 2.11 Objective 1:To meet the housing needs of the Felixstowe Peninsula through an appropriate mix of house types for younger generations and the growing population with a particular emphasis on provision of affordable housing

Your plan quotes the 2011 Census for the increase in the population in Felixstowe but fails to take into consideration the age of the population and the occupancy of the properties.(All available from the census.) There is an urgent need for bungalows (medium size,2/max.3 bedroom with very small plots) in the Felixstowe area sort by the increasing elderly Felixstowe residents who want to remain independent and not wishing to go down the line of residential apartments. At the present time a presentable bungalow in and around Felixstowe attract the same price as 3/4 detached houses so there appears little incentive or opportunity for the numerous single or dual occupants of these properties to move, which would free up the housing market-couples with families moving up leaving the smaller properties for first time buyers -not buy to let!

As the government policy appears to be "care in the community", bungalows are another way to help the increasing elderly population in Felixstowe manage this.

Affordable housing - this appears from my experience of your planning meetings, a complete farce as you can not enforce it and many developers change their minds after building consent has been granted.

Sustainabity Appraisal.

- 7. To meet the housing requirements of the whole community,
- 10. To maintain and where possible improve air quality,
- 11. To conserve soil resources and quality,
- 14. To reduce the effects of traffic on the environment,
- 16. To reduce vulnerability to flooding,
- 19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.

With reference to the Sustainability Appraisal, they do not appear to have been considered in relation to the developments to Conway Close (502e) and Ferry Road DC/13/3069/OUT).

- 7. What about elderly population in Felistowe?
- 14. Traffic- Gulpher Road is deemed a "quiet road"! Ferry Road/ Colneis Road 500+ cars and service vehicles!
- 16. Both sites will flood onto the surrounding areas and the roads have no drainage!
- 19. Despite what has been stated both these developments will have an impact and effect on the Area of Outstanding Natural Beauty (AONB).

FPP5 Conway Close (502e)

There appears to be a degree of hypocrisy and lack of consistency on behalf of SCDC Planning department's contribution to this section when compared with the permission granted under DC/13/3069/OUT Ferry Road.

- 3.39 This is only a natural extension to Felixstowe because of the permission relating to DC/13/3069/OUT and despite the statement it will cause visual impact from the AONB.
- 3.40 Why was no condition of height imposed on DC/13/3069/OUT 2 1/2 storey houses are effectively 3 storey which are not in keeping with the adjacent area especially with Brinkley way being the "ribbon" behind Westmoreland Road/Rushmeadow Way. The density of both sites exceeds your own core strategy document of 35 houses per hectare not to mention that density far exceeds the adjacent areas.
- 3.41 No provision other than small green areas for open spaces on DC/13/3069/OUT.
- 3.42 No sympathetic design on the edge of DC/13/3069/OUT- just 2 1/2 storey houses which will be seen from Felixstowe Ferry.
- 3.43 No consideration for Wildlife under DC/13/3069/OUT -we have bats /kestrels regularly feeding in the area.

O - 6838 - 3319 - 2.11 - None

6838 Object

Vision and Objectives for Felixstowe Peninsula AAP

3.44 This is the only common clause - as previously stated the sites will need some form of road drainage as at present the culvert at the junction of Marsh Lane/Ferry Road drains to the ditches on to the Kingsfleet course of Felixstowe Ferry Golf course.

2.11

3.45 This area cannot accommodate 500+ cars and service vehicles not only in the immediate area but onwards to the A14. If the development of the land "North of High Street, Walton" is permitted with access to Candelet Road then Felixstowe will become gridlocked especially with your plan identifying potential new jobs at the port.

In the Area action Plan, you mention the re-opening of the Spa Pavilion yet in your parking provisions you have not made recommendations for parking there - remember the elderly population whom are likely to be needed to support it in the future months.

Summary:

Your plan quotes the 2011 Census for the increase in the population in Felixstowe but fails to take into consideration the age of the population and the occupancy of the properties.(available from the census.) There is an urgent need for bungalows (medium size,2/max.3 bedroom with very small plots) in the Felixstowe area sort by the increasing elderly Felixstowe residents who want to remain independent and not wishing to go down the line of residential apartments. As the government policy appears to be "care in the community", bungalows are another way to help the increasing elderly population in Felixstowe manage this.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 6887 - 3785 - 2.11 - None

6887 Comment

Vision and Objectives for Felixstowe Peninsula AAP 2.11

Respondent: Stephen Wyatt [3785] Agent: N/A

Full Text: It is important to specify a number of ways in which affordable housing for young people should be made available, via

housing associations, through shared ownership schemes etc

Summary: It is important to specify a number of ways in which affordable housing for young people should be made available, via

housing associations, through shared ownership schemes etc

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6912 - 3234 - 2.11 - None

6912 Object

Vision and Objectives for Felixstowe Peninsula AAP 2.11

Respondent: Mrs Julie Cornforth [3234] Agent: N/A

Full Text: Will our local young people be able to afford one of these new houses? Re EADT 18/11/15. "First time buyers need to

double wages to get an average mortgage"
Ave house price in Suffolk 2014 = £220,460
Mean annual earnings 2014 = £23,561
Income required for 80% mortgage 2014 = £50,391

Payrise required for average earner to afford 80% mortgage = £26,830

Ratio of house prices to incomes = 9.4

Summary: Will our local young people be able to afford one of these new houses? Re EADT 18/11/15. "First time buyers need to

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Income required for 80% mortgage 2014 = £50,391

Payrise required for average earner to afford 80% mortgage = £26,830

Ratio of house prices to incomes = 9.4

Change to Plan So who will be able to afford to buy these houses? Or are we still an "overspill area" for London?

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7593 - 3451 - 2.11 - None

7593 Comment

Vision and Objectives for Felixstowe Peninsula AAP 2.11

Respondent: Mr Michael Ninnmey [3451] Agent: N/A

Full Text:

In the previous response to the Consultation I requested whatever the "House Occupancy" was as E of E indicated back in 2004/5: which indicated that 50% of build was because less people in dwellings. What impact did 2008 crash have?

FPAAP

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Sevenhill interchange suffers congestion already.

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No reference to Health or wellbeing provision.

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2.02

No reference to Area pre- 1890 Walton has been erased!

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By 2027! Children of many residents will have moved, because house building not meeting needs of local people, particularly low income young residents.

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Change to Plan

C - 7593 - 3451 - 2.11 - None

7593 Comment

Vision and Objectives for Felixstowe Peninsula AAP 2.11

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

M Ninnmey Comments.pdf

C - 7083 - 3894 - 3.01 - None

7083 Comment

Housing 3.01

Respondent: Mr Richard Burrow [3894] Agent: N/A

Full Text:

Having read the Felixstowe Peninsula Area Action Plan I am pleased with much of the content in that many of the environmental issues have been identified. However, I disagree with the assumption that the town's growth is inevitable at the expense of greenfield sites and extra burdens on the sewage and highways networks. There is mention of 'organic growth'; the plans go far beyond this. Here are my observations:

- 3.01 There is a reference to the need for 807 new homes for the peninsula. How has this demand been identified? Is there actually a growing population or is valuable farmland and countryside being sacrificed to artificially create a demand for new housing for the benefit of developers? With Felixstowe's specific demographic, there is a natural turnover of the different types of housing as residents move through the different phases of their lives e.g. downsizing through retirement or infirmity, meaning that properties are regularly becoming available (with the possible exception of affordable homes for purchase by first time buyers).
- 3.27 The area between the A14 Spur, Candlet Road and High Street, Walton is valuable and productive farmland and effectively constitutes a green belt in all but name between the Trimleys and Walton. The suggested development would change the rural nature of the approach to Felixstowe and further urbanise Candlet Road, particularly with the planned new road junction. I feel strongly that it should remain as farmland. The same argument applies to the other large greenfield sites identified, Poultry and Mill farms.
- 3.39 Development of this site to the north of Conway Close will contribute to the spread of the town into open countryside as well as causing ribbon development along Ferry Road. The fears that new housing in this area will impinge on Gulpher Lane in terms of traffic are very real; Colneis Road will definitely suffer increased vehicle use. This rural fringe of Old Felixstowe is picturesque and should be protected, in my opinion.
- 6.0 There is no mention in the document of the contribution of sea angling to the local economy, a strange omission for a town with a long tradition of fishing. I fish the local beaches twice a week on average and am impressed by how far visiting anglers travel to our shores. Perhaps there should be some appropriate signage identifying suitable fishing areas, launching sites, species with size limits etc. and the provision of vantage points for disabled anglers could be a possibility. Measures to promote such a healthy outdoor activity could be very beneficial to Felixstowe. Any putative redevelopment of the pier could have some planning requirements encouraging the attachment of a fishing jetty-Southwold Pier was built with this feature as part of the design.
- 6.34/ 6.35 Many vehicle enthusiasts see Felixstowe as destination of choice. The local plan could incorporate provision in the form of a designated sea front space (a car park on other days) that is bookable by, for example, classic car or motorcycle clubs, scooter enthusiasts etc. This would serve such organisations with the bonus of providing additional attractions for both visitors and residents in a regulated environment.

Summary:

There is a reference to the need for 807 new homes for the peninsula. How has this demand been identified? Is there actually a growing population or is valuable farmland and countryside being sacrificed to artificially create a demand for new housing for the benefit of developers? With Felixstowe's specific demographic, there is a natural turnover of the different types of housing as residents move through the different phases of their lives e.g. downsizing through retirement or infirmity, meaning that properties are regularly becoming available (with the possible exception of affordable homes for purchase by first time buyers).

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7284 - 3944 - 3.01 - None

7284 Comment

Housing 3.01

Respondent: The Ravenshear Family [3944] Agent: Fletcher Barton Ltd (Mr William Barton) [3482]

Full Text:

We understand that at the time of the core strategy examination in public in 2013, the best available evidence of Objectively Assessed Need (OAN) was 11,000 new homes and this is considered to have increased since then. However on page 17 section 3.01 it states that at least 7,900 homes are to be provided. Bearing in mind this has now increased by over 3,000, we do not believe enough sites have been allocated.

Page 19 preferred policy FPP1 does not show any housing allocation for Bucklesham for the period 2015-2027. We would suggest that a minimum of 8 units are allocated to Bucklesham in line with previous contributions and housing distribution generally within the Felixstowe Peninsula.

Page 20 paragraph 3.16 would appear to conflict with paragraph 2.06 on page 14 and we suggest that paragraph 3.16 is amended to make it clear that in fulfilling local need and therefore housing numbers in the district, physical limit boundaries should be capable of being amended to include the allocated development.

Furthermore the restriction on development outside physical limits boundaries further highlights the problems identified above regarding shortage of allocated sites. In the example of Bucklesham there are very limited options for development within the existing settlement. As planning policies should be based on the most up to date evidence it is illogical to prevent development outside the current limits when it is inevitable that more land will be needed. Policy FPP2 sets an unnecessary policy obstacle to development that cannot be considered to be positively prepared given the lack of up to date evidence on housing need.

Appendix 4, insert map for Bucklesham, should be amended to show site 914 as previously put forward as part of the SHLAA process. The so called negative effects against the site should be addressed at planning application stage. Additionally to allow a small scale development and to reflect the poorer quality area of land from a landscape point of view being the area adjacent to the road and around the sewage works, we would suggest the special landscape area is amended as annotated on the enclosed plan. It should be noted that additional land could be made available to provide landscape features to mitigate the development on the adjoining land. The site and additional land is shown edged blue on the plan as attached.

Summary:

We understand that at the time of the core strategy examination in public in 2013, the best available evidence of Objectively Assessed Need (OAN) was 11,000 new homes and this is considered to have increased since then. However on page 17 section 3.01 it states that at least 7,900 homes are to be provided. Bearing in mind this has now increased by over 3,000, we do not believe enough sites have been allocated.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Preferred Options Bucklesham Map.pdf

O - 6948 - 3234 - 3.04 - None

6948 Object

Housing 3.04

N/A Respondent: Mrs Julie Cornforth [3234] Agent:

Full Text: FELIXSTOWE FLYER APRIL 2013

Local Matters with John Goodwin

He quotes "I am actively involved in trying to ensure that if we are to have all of these new homes predicted, then Suffolk County Council as Highways Authority are consulted by the District Council. Provision of roads that are fit for purpose, sufficient school place, medical provision plus numerous other services must surely be sorted out first. New residents will need employment opportunities, where are the jobs, all these things need consideration before building work starts. Education requirements, road infrastructure and employment often seem not to get a mention"

FELIXSTOWE FLYER APRIL 2013 Summary:

Local Matters with John Goodwin

He quotes "I am actively involved in trying to ensure that if we are to have all of these new homes predicted, then Suffolk County Council as Highways Authority are consulted by the District Council. Provision of roads that are fit for purpose, sufficient school place, medical provision plus numerous other services must surely be sorted out first. New residents will need employment opportunities, where are the jobs, all these things need consideration before building

work starts. Education requirements, road infrastructure and employment often seem not to get a mention"

Change to Plan Does any other Conservative Councillor feel this way or even care?

Answers on another postcard!

Legal? **Duty to Cooperate? Soundness Tests** Appear at exam? Sound?

Not Specified Not Specified Not Specified Not Specified None

C - 7067 - 2744 - 3.05 - None

7067 Comment

Full Text:

Housing 3.05

Respondent: Mr & Mrs Trevor & Gillian Mason [2744] Agent: N/A

Housing

3.05 - "Within the Felixstowe Peninsula a figure of 50 units has been added to the requirement for Felixstowe Walton and the Trimlevs"

The below comments are forwarded in response to the consultation which ends on Monday 30th November 2015.

How is this figure calculated? The overall figure for Felixstowe has risen from 1,400 (inc the surrounding villages) in 2008 to 1,810 (exc the surrounding villages) in 2015. With this figure moving upwards all the time, the AAP will be meaningless by 2027. What plans are there to review it at regular intervals?

With regard to infrastructure provisions, there is currently a waiting list of 700 people at Crescent Dental Practice. The Grove Medical Centre (the largest in the town) is short of three doctors, and has to rely on retired GPs to try and fill the gaps. Their recent advertisement for salaried doctors achieved no applicants.

How are all these new residents going to be accommodated? Hoping for the best is not good enough.

Land North of Conway Close - SHLAA Ref. 502e

The Assessment is misleading and inaccurate in that it would provide access to two primary schools - if they still have capacity once the 200 homes have been built on the other side of Ferry Road. Those houses are intended to have their full quota of affordable houses in order to attract young families. For "Helps reduce the effects of traffic on the environment" read "access will be via a narrow country road which cannot cope with the current level of traffic". The main access to and from the Academy will be via a designated Quiet Lane, otherwise a two mile journey along Walton High Street will be necessary.

The site is referred to as "a central location" which is incorrect. It is 1.5 miles from the town centre, 4 miles by road from the Port complex, making a car essential. Its only large shopping outlet (20 minutes walk) is a convenience store whose prices accommodate small shopping needs only.

The site will suffer the same drainage problems as its neighbour, with developers to date being unable or unwilling to install a new system due to cost.

Preferred Policy FPP5:

150 dwellings is a minimum and based on medium density. No developer would be able to make a profit on providing 150 homes in keeping with existing (predominantly bungalows), let alone provide public open space and play facilities.

Directly opposite this site OPP was given last year for up to 200 homes, which represents high density. No stipulation was made that the new homes had to be in keeping with existing residences and no maximum height was given. No play space or open space is being provided (on the basis that the Council has refused to pay for its upkeep) and it is obvious that the same will apply to the 502e site.

District Centres

FPP17:

Expansion of District Centres - the DC identified at High Road East is entirely surrounded by houses. Apart from expanding across the road to Brackenbury Sports Centre, it does not seem possible to expand the retail element in this area.

In general terms, how is it possible to expand District Centres without affecting the town centre?

Some clarification on this point is necessary in order to convince the public.

Leisure

It can be anticipated that the 1,800 new residents will want something to do in their leisure time, but no specific activities are mentioned in the AAP. An opportunity has been lost with the designation of the old Yacht Pond site as a car park when it is not being used for mobile events - can this decision be reviewed in, say, two years time when useage for events is known? It would make a great site for a skate park and keep the youngsters off the road and the prom - particularly now the latter is being used by cyclists.

FPP22:

C - 7067 - 2744 - 3.05 - None

7067 Comment

Housing 3.05

"Uses which enhance the unique landscape of Landguard" What are these? No examples are given. Does it take account of the current plans for the redevelopment of the Port and movement of the Viewing Point Café nearer to the museum? Car parking is essential to enjoy this area but should not be provided to the detriment of the natural enjoyment of this unique area.

Could some effort be made to ensure that bins are provided for detritus left by fishermen? Landguard beach is vulnerable to old bait and fish heads barely concealed in newspaper and buried in the shingle. This should not be allowed as it represents a serious hazard for others trying to enjoy the area. This will be particularly important if enhancement of the area is planned.

Summary:

How is this figure calculated? The overall figure for Felixstowe has risen from 1,400 (inc the surrounding villages) in 2008 to 1,810 (exc the surrounding villages) in 2015. With this figure moving upwards all the time, the AAP will be meaningless by 2027. What plans are there to review it at regular intervals?

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot Specified

O - 6911 - 3234 - 3.06 - None

6911 Object

Housing 3.06

Respondent: Mrs Julie Cornforth [3234] Agent: N/A

Full Text: If you think building 1810 units/houses in Fxt isn't going to have a detrimental effect on the whole town, then think

again. Doctors surgeries at full capacity. Can the schools cope? Have we got enough dentists? Etc, etc,etc...Fxt is

only a market town on a DEAD END - the A14 -one road in and out.

Summary: If you think building 1810 units/houses in Fxt isn't going to have a detrimental effect on the whole town, then think

again. Doctors surgeries at full capacity. Can the schools cope? Have we got enough dentists? Etc, etc,etc...Fxt is

only a market town on a DEAD END - the A14 -one road in and out.

planners don't live on the peninsula?

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6650 - 3234 - 3.07 - None

6650 Object

Housing 3.07

Respondent: Mrs Julie Cornforth [3234] Agent: N/A

Full Text: Obviously "organic and evolutionary growth in Fxt and the Trimleys over a mixture of sites" has now been turned into

vast housing estates (190 units in Walton, 200 units in Ferry Road, Old Fxt etc...for example) being dumped all around

the peninsula! Doesn't seem to be protecting "prime agricultural land for essential food production!"

Summary: Obviously "organic and evolutionary growth in Fxt and the Trimleys over a mixture of sites" has now been turned into

vast housing estates (190 units in Walton, 200 units in Ferry Road, Old Fxt etc...for example) being dumped all around

the peninsula! Doesn't seem to be protecting "prime agricultural land for essential food production!"

Change to Plan Only SCDC could change "black" into "white!" Nice one!!!!

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

S - 7101 - 3314 - 3.07 - None

7101 Support

Housing 3.07

Respondent: Lorna Adamson [3314] Agent: N/A

Full Text: Comments on the Felixstowe Peninsula Action Plan

FPAP 3.07 I welcome the aim to preserve as far as possible prime agricultural land for food production. FPAP 3.20 I welcome the statement that proposals for new residential development outside the physical limits boundaries will be strictly controlled in accordance with national planning policy and the strategy for the countryside as set out in Core Strategy policy SP29.

I welcome the statement that extending the boundaries further was considered inappropriate because this may lead to further development in locations which are not well related to the existing settlements, services and facilities and lead to new building encroaching into the countryside.

FPAP 3.26 to 3.38 Land north of Walton High Street I am concerned at the loss of prime grade 1 and 2 agricultural land with the proposals for this site when 3.07 states the aim to preserve to preserve prime agricultural land for food production. I am not clear what 'mitigation may offset the loss of greenfield land of Grade 1-2 Agricultural soil classification'. I am also concerned about the potential for very heavy traffic on the High Road opposite Felixstowe Academy. The High Road is the main route into Walton and Felixstowe used by many residents living in the Trimleys in order to avoid the Howlett Way sliproad onto the A14 with heavy lorries to the docks bearing down on local vehicles. There should be a transport assessment carried out on the implications for the High Road - particularly at peak times of the day.

FPAP 3.50 Site opposite the Hand in Hand pub in Trimley St Martin I would endorse the need for a transport assessment here too as 'access to this site must be onto High Road as this provides the most suitable access point for the development and would also require a transport assessment to be undertaken as part of any future application. In addition, there is 'the major negative environmental effect is due to loss of Grade 2 agricultural soils.' I should be interested to know what 'Scope exists to mitigate for this effect.'

FPAP Site 451c and 451d With my concerns about the implications of development for traffic congestion and danger for users on the High Road, I am very worried about the proposal for a minimum of 350 houses on this site. The SSAASP mentions only a transport assessment for Howlett Way. There is also the major negative environmental effect from the loss of Grade 2 agricultural soils and again I am unconvinced by the statement 'scope exists to mitigate for this effect'. There should at least by a transport assessment carried out on the implications for the High Road - particularly at peak times of the day.

The Old Poultry Farm - which the site 451c wraps around - is brownfield land and an eyesore. I cannot see anyone particularly wishing to live in houses which are built beside this derelict site.

FPAP Appendix 3

I welcome the decision to discount the sites in Trimley St Martin set out in this Appendix. However, I am very disappointed that sites 920, 928 and 726 have been left for consideration in 'The local plan review' when they so clearly in my view violate national planning policy and the strategy for the countryside as set out in Core Strategy policy SP29.

Summary: I welcome the aim to preserve as far as possible prime agricultural land for food production.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

O - 6737 - 3782 - Preferred Policy FPP1: Housing - None

6737 Object

Housing Preferred Policy FPP1: Housing

Respondent: Mary Wyatt [3782] Agent: N/A

Full Text: Every effort should be made to make sure that there is a large number of affordable houses made available to Housing

Associations on each new development area.

Summary: Every effort should be made to make sure that there is a large number of affordable houses made available to Housing

Associations on each new development area.

Associations on each new development area.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6743 - 3785 - Preferred Policy FPP1: Housing - None

6743 Comment

Housing Preferred Policy FPP1: Housing

Respondent: Stephen Wyatt [3785] Agent: N/A

Full Text: I question the need for 877 new housing units in Felixstowe in the light of the decline in Felixstowe's population from the

2001 to the 2011 census. Many new housing units have already been built or have planning permission. I suspect

many are currently unoccupied.

Summary: I question the need for 877 new housing units in Felixstowe in the light of the decline in Felixstowe's population from the

2001 to the 2011 census. Many new housing units have already been built or have planning permission. I suspect

many are currently unoccupied.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6837 - 3825 - Preferred Policy FPP1: Housing - None

6837 Object

Housing Preferred Policy FPP1: Housing

Respondent: Mr Kenneth Ferriss [3825] Agent: N/A

Full Text: It is misguided to presume that building on green belt will solve our housing problems once building starts on green belt

its benefits such as protecting the ANOB, access to the countryside, flooding all start to disappear.

With our population increasing it is vital the green belt continues to provide these benefits. We are facing more pollution

and congestion on our already overcrowded roads as well as an overload on our public services.

It is vital that we use sustainable brown field sites and natural infills and protect our green field food producing sites for

the future.

Summary: It is misguided to presume that building on green belt will solve our housing problems once building starts on green belt

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and congestion on our already overcrowded roads as well as an overload on our public services.

It is vital that we use sustainable brown field sites and natural infills and protect our green field food producing sites for

the future.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6917 - 1968 - Preferred Policy FPP1: Housing - None

6917 Object

Housing Preferred Policy FPP1: Housing

Respondent: R Wood [1968] Agent: N/A

Full Text: The overall numbers of new houses are not required, the targets and analysis are based on out-of-date information. In

general the preferred sites are greenfield agricultural land that goes against the stated objective of building on brownfield sites first and wherever possible. There seems to be a complete lack of joined up thinking; the new academy school has thrown the Deben school and Orwell school sites free for use as ideal house building locations. These would be prime centrally located sites in the town centre with all the supporting infrastructure and transport, and yet they do not appear in the plan whereas sites like 502e the agricultural land north of Conway Close and the neighbouring agriculture site bounded by Ferry Road and Gulpher Road, comprising some 350 homes in total, is out on

the far edge of Felixstowe with totally unsuitable road access and inadequate infrastructure and transport links.

Summary: Overall numbers are not required, being based on out-of-date information. The sites are mainly greenfield agricultural

that goes against stated objective of brownfield first wherever possible. The new academy school has thrown Deben and Orwell school sites free. These are ideal for house building, centrally located with all the supporting infrastructure and transport, yet they are not in the plan whereas 502e agricultural land north of Conway Close plus neighbouring site by Ferry Road and Gulpher Road (350 homes) is on the far edge of Felixstowe with totally unsuitable road access and

inadequate infrastructure and transport links.

Change to Plan Include central brownfield sites of old Deben School and Orwell school, omit sites near Ferry Road/Gulpher Road

intersection.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6971 - 2564 - Preferred Policy FPP1: Housing - None

6971 Object

Housing Preferred Policy FPP1: Housing

Respondent: Kirton and Falkenham Parish Council (Mr Colin Agent: N/A

Shaw) [2564]

Full Text: Parish Council response to the SCDC FPAAP Preferred Options document public consultation

24th November 2015

1. Housing

A. Village capacity

Page 19. Preferred Policy FPP1 Housing. Kirton and Falkenham.

This table is confusing; it states the indicative requirement for 1/4/2015 to 31/3/2027, but does not take into account the actual approved figures; namely the 43 houses of the Taylor Wimpey development. The note of paragraph 3.10 does address this, but is easily missed if the table is read in isolation, as it will be. There should be a reference in the table to paragraph 3.10 and this paragraph should be quantitative rather than stating that the table gives minimum figures; namely that the approved applications 1/4/2015 to 31/3/2027 gives a total 50 for Kirton, which is 19% more than the Total Planned.

B. Site 325a

Page 37. Land at Bucklesham Road, Kirton, 325a. Also table on Page 99.

This site should be removed from this list of preferred options for the following reasons:

- a) Without this site, Kirton is already providing 50 houses, 8 more than the FPAAP requires, which is 19% above the 'minimum' figure. Therefore this site is not necessary.
- b) SCDC's sustainability analysis is overall negative for Social Effects, overall negative for Environmental Effects and slightly positive for Economic Effects. This gives an aggregate of negative sustainability, whilst every other preferred options site is assessed as positive sustainability. We note that SCDC does state that 325a scores poorly for environmental effects and that it is unlikely that these can be mitigated. Site 325a is the only unsustainable site in the list of preferred options and so should be removed. The Parish Council's previous recommendations for sustainability scores (attached at the back) [see attached document] have not been incorporated; these would give an even more negative score.
- c) Residents have raised valid concerns about the access visibility to the road and also the danger and frequent jams due to large agricultural vehicles and buses negotiating the narrow road with tight bends, unable to pass each other. Before this site is further considered SCDC should ask SCC Highways to hold a site visit at an advertised date and time, so that interested parties can express their concerns.
- d) Residents have also highlighted the effect on the environment; wildlife, trees and the Special Landscape Area, including this site. If this site is developed, then the entire village will lose the visual amenity of this Special Landscape Area. The Parish Council have already responded at SCDC's request to SCDC's Sustainability Analysis (attached at the back) [see attached document]; however many of our comments have not been incorporated in the Preferred Options. For example, the Parish Council advised that "To conserve and enhance the quality and local distinctiveness of landscapes and townscapes" should be marked "--" as opposed to SCDC's marking of "-/?".
- e) The pavement is insufficiently wide for pushchair and mobility scooters.
- f) At some point SCDC changed the indicative capacity from 7 to 15. Again this is an increase in housing beyond the capacity of the village's services and transport.
- C. Kirton should not be developed further unless local services and transport improve.
- a) The Parish Council has repeatedly stated that the current lack of services and transport in the village make it unsuitable to be developed as a dormitory, by further home building. To do so would impact greatly on the environment and quality of life of residents. The FPAAP's sustainability analysis makes clear that sites near centres of services and transport, such as Felixstowe and the Trimleys, score much higher on sustainability. Homes should be built near work places and retail, healthcare and transport facilities.
- b) As an example; those attending the Suffolk One Sixth Form College currently have to walk from Kirton to Trimley St. Martin to catch a bus to the school. Surely new housing should be located near services?
- c) There is particular concern that the housing increase in Kirton and Trimley St. Martin will put pressure on school capacity in the short and medium term; there has been no school capacity plan communicated which aligns with the site proposals. Further increase in the size of Trimley St. Martin School will cause deterioration of a currently severe traffic and parking problem at the school.
- d) As mentioned in the draft document, Anglia water will need to enhance the sewerage capacity if significant numbers of additional houses are built. This must be done as part of an end to end design, to ensure that problems are not created further up or downstream.

D. Bungalow Policy

SCDC have advised the Parish Council that SCDC cannot insist that bungalows are included in any future development, unless this is included as a policy in the FPAAP. The view of the village is that any future development should include bungalows.

Therefore, without in any way compromising the views above (that the village's lack of services and transport means that any further development is inappropriate), the FPAAP should include a statement that any future development in the village, which would be against the majority of parishioners' wishes and the Parish Council's advice, should include bungalows.

2. Physical Planning Boundary

O - 6971 - 2564 - Preferred Policy FPP1: Housing - None

6971 Object

Housing Preferred Policy FPP1: Housing

Page 115. Appendix 5 Kirton Inset Map

Replace inset map with the originally proposed new village envelope - see below [see attached document]; reviewed and agreed at public meeting with 250 parishioners, the Parish Council and representative from SCDC. Remove all proposed sites including 325a in the latest version, except for 712 which has already been approved.

3. Areas to be protected from development.

To include in the protected area of Falkenham the curtilage/area surrounding The Old Vicarage and The New House. This area has boundaries with the ANOB, the Church/Churchyard, open countryside and the curtilage of listed buildings. The area was previously protected from development as it was outside the village envelope and protection would put it in the same category as similar areas in Kirton and Bucklesham.

Being in a classification of Other Village or Open Countryside does not give protection from future development.

Summary:

This table is confusing; it states the indicative requirement for 1/4/2015-31/3/2027, but does not take into account the actual approved figures; namely the 43 houses of the Taylor Wimpey development. The note of paragraph 3.10 does address this, but is easily missed if the table is read in isolation, as it will be. There should be a reference in the table to paragraph 3.10 and this paragraph should be quantitative rather than stating that the table gives minimum figures; namely that the approved applications 1/4/2015-31/3/2027 gives a total 50 for Kirton, which is 19% more than the Total Planned.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

parpl2015fpaapPCresp.pdf

C - 6986 - 3872 - Preferred Policy FPP1: Housing - None

6986 Comment

Housing Preferred Policy FPP1: Housing

Respondent: Mr Howard Price [3872] Agent: N/A

Full Text: Representing a min 5% increase in the population of Felixstowe before 2027, the indicative requirement of 500

additional homes looks excessive and isn't supported in this document by any commensurate projection for increased employment opportunities or healthcare facilities while it is silent on school places. By comparison, the allocation of preferred locations at 220% of expected need is extravagant and possibly unwise if, as proposed by the government, it leads to Permission in Principle, leaving only (so far unexplained) 'technical details' to be determined by the LPA.

Summary: Representing a min 5% increase in the population of Felixstowe before 2027, the indicative requirement of 500

additional homes looks excessive and isn't supported in this document by any commensurate projection for increased employment opportunities or healthcare facilities while it is silent on school places. By comparison, the allocation of preferred locations at 220% of expected need is extravagant and possibly unwise if, as proposed by the government, it leads to Permission in Principle, leaving only (so far unexplained) 'technical details' to be determined by the LPA.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7015 - 2980 - Preferred Policy FPP1: Housing - None

7015 Object

Housing Preferred Policy FPP1: Housing

Respondent: Christchurch Property Company Limited [2980] Agent: Richard Brown MSc (Mr Richard Brown) [3387]

Full Text: 1. INTRODUCTION

- 1.1 Christchurch Land and Estates (Felixstowe) Limited (hereinafter referred to as "Christchurch") are the promoters of the land at Candlet Road Felixstowe (hereinafter referred to as "the site") edged red on the plan attached as Annexure 1.
- 1.2 It is confirmed in paragraph 4.28 of the adopted Local Plan (July 2013) with our emphasis added that
- "4.28 Felixstowe with Walton is by far the largest town within the District and includes the port of Felixstowe, a strategic employment site, being of both regional and national significance....."
- 1.3 With regard to the site at Candlet Road therefore being an urban extension to the "largest town within the District", the site is considered to be a highly sustainable location for residential development, and should therefore be allocated for residential development.
- 1.4 Christchurch consider that the Council, in the emerging AAP document are not addressing the full objective assessment of housing need (FOAN) for the District, which contention is supported by the Pegasus Group Report (February 2015) which was attached as Annexure 2 to the Submissions made previously in February earlier this year.

In paragraph 3.2 of the Pegasus Report, they confirmed

"The Inspector who carried out the examination into the Core Strategy crucially highlighted that the East of England Forecasting Mode (EEFM) which informed the Council's Housing Topic Paper evidence base identified a need for 11,000 extra dwellings over the plan period.

The Local Authority position is that this figure is the FOAN but that the core strategy (plan) should not provide for this scale of development at the stage of adoption. The Inspector agreed but endorsed the position to have an early review of the Core Strategy to achieve a fully plan-led approach to new development considering a FOAN of 11,000 dwellings 2010 to 2027.

- 1.5 Paragraph 182 of the National Planning Policy Framework considers that for a plan to be considered "sound" it should be "positively prepared", that the plan should meet objectively assessed development requirements. The AAP, therefore, in not addressing the FOAN of 11,000 dwellings for the district, it is submitted, is not "positively prepared".
- 1.6 The growth of Felixstowe (dispersed), as in the AAP document, is not considered the most appropriate strategy for the future development needs in the Peninsular, as there is no proper or sufficient analysis to lead to the conclusion that the land at Candlet Road (abutting the Felixstowe settlement boundary) should not be allocated for residential development.
- 1.7 Paragraph 182 of the Framework confirms that for a plan to be considered "sound" that it should be "justified", that the plan "should be the most appropriate strategy" where the AAP dispersed pattern of development is not the most appropriate strategy nor is "consistent with national policy" (paragraph 52).
- 1.8 The Submissions made by Christchurch earlier this year also contained a detailed response to the Strategic Housing Land Availability Assessment (SHLAA) (31st March 2014) and the corresponding consideration of site suitability in the emerging Plan.
- 1.9 The sustainability credentials of the Candlet Road site were also further considered by the Turley Sustainability Appraisal (February 2015) attached as Annexure 3 in the Submissions made by Christchurch earlier this year.
- 1.10 The site has not been allocated in the AAP, therefore in terms of the emerging Plan, the site is an "omission site".
- 1.11 The Council has failed to properly assess appropriate alternative sites in their Interim Sustainability Appraisal to ensure that the most sustainable sites come forward. The plan is, therefore, not "justified.

2. FULL OBJECTIVELY ASSESSED HOUSING NEED

- 2.1 It is considered that the Council cannot demonstrate a 5 year supply of housing in accordance with the requirements of the Framework.
- 2.2 The Inspector examining the Suffolk Coastal Core Strategy concluded in his final Report (June 2013) that the scale of housing provision (2010 to 2027) of 7,900 dwellings (465 per annum), fell substantially short of the full, objectively assessed need (OAN) at that time. As such, the Core Strategy was only adopted on the basis that an early review would be undertaken, as set out in Policy SP2 itself, which will commence with the publication of an Issues and Options

O - 7015 - 2980 - Preferred Policy FPP1: Housing - None

7015 Object

Housing Preferred Policy FPP1: Housing

Report by 2015 at the latest.

- 2.3 In view of the need for an early review of the Core Strategy to establish the full OAN for the District and address the housing requirement accordingly, it is relevant given the timescales in the determination of this appeal to assess the full, up-to-date OAN for housing in Suffolk Coastal District in accordance with the policy set out in the Framework and the guidance in Planning Practice Guidance (PPG).
- 2.4 With the Council not commencing the review of the Core Strategy, including by publishing evidence as to the full OAN for housing in the District, it must be the case that Policy SP2 and the housing provision of 7,900 dwellings 2010 to 2027 will become out-of-date at the end of 2015.
- 2.5 Christchurch will also refer to the recent decision of the Inspector in an appeal decision at Saxmundham (APP/J3530/A/14/2221769) (July 2015), where he considered the correct method of determining the five year housing land supply in Suffolk Coastal. He determined that the correct method of dealing with shortfall in the delivery of housing to date was the use of the 'Sedgefield' approach which seeks to make up the under supply from the start of the plan period in the five year housing requirement.

In addition, and contrary to the Council's latest five year supply of housing position statement as at March 2015 (issued in June 2015), with regards to the percentage buffer to be applied to the five year requirement the Inspector found that a 20% buffer should be applied in Suffolk Coastal given that there have been 6 consecutive years of past under delivery.

- 2.6 It was agreed between both parties in the Saxmundham appeal that, at that time and for the purposes of that appeal, the housing requirement in the Core Strategy be used in the determination of the five years supply of housing land. Against the Core Strategy housing requirement and in light of his findings as to the correct method of dealing with past undersupply and the application of a buffer of 20%, the Inspector found there to be a 3.2 years housing land supply in Suffolk Coastal.
- 2.7 The Council have not made progress with an early review of the Core Strategy, the housing provision figure in Policy SP2 will be out-of-date. There will therefore be a need for the Inspector to come to a judgment as to what the full, OAN for housing in the District is for the purposes of the emerging Plan.

3. THE EMERGING STRATEGY

- 3.1 The growth of Felixstowe, as promoted in the AAP, is not considered the most appropriate strategy for the future development needs in the Peninsular, as there is no proper or sufficient analysis to lead to the conclusion that the land at Candlet Road (abutting the Felixstowe settlement boundary) should not be allocated for residential development.
- 3.2 The land at Candlet Road should be allocated as it will assist with meeting an identified housing need and deliver sustainable development.
- 3.3 The adopted Local Plan (July 2013) confirms at paragraph 4.28
- "4.28 Felixstowe with Walton is by far the largest town within the District and includes the port of Felixstowe, a strategic employment site, being of both regional and national significance....."
- 3.4 Paragraph 4.31 of the adopted Local Plan confirms
- "4.31 The growth of jobs in Felixstowe, driven by expansion of the Port, means that employment is now out of balance with the availability of housing. As a result, more of the new jobs are being taken up by people who are not able to find a home in Felixstowe, even if they would like one...."
- 3.5 It is, therefore, considered that the site at Candlet Road Felixstowe is in a position to "redress" this imbalance identified at paragraph 4.31 of the adopted Local Plan.
- 3.6 It is, further acknowledged, at paragraph 4.35 of the adopted Local Plan that
- "4.35 Longer term, it is likely that additional housing will need to be provided......"
- 3.7 Strategic Policy SP21 of the adopted Local Plan confirms with our emphasis added
- "The strategy for Felixstowe will be to reverse the recent trends towards a population in balance, threats to local services and a decline in the fortunes of the town in order to enable it to fulfil its role as a major centre......"
- "Additional housing will be created. In the short to medium term, this will represent organic and evolutionary growth in the Felixstowe and Trimleys area over a mixture of sites immediately abutting existing built up areas......"
- 3.8 Whilst adopted Local Plan policy SP21 confirms a "strategy for a dispersed pattern of future development" it is submitted that a dispersed pattern is acting against the promotion of sustainable development as confirmed in

O - 7015 - 2980 - Preferred Policy FPP1: Housing - None

7015 Object

Housing

Preferred Policy FPP1: Housing

paragraph 14 of the National Planning Policy Framework

14. At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

For plan-making this means that:

- local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted.

For decision-taking this means:

- · approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted."
- 3.9 Also, a dispersed pattern of development is contrary to the aims and objectives of paragraph 52 of the Framework, therefore, the Plan is not "consistent" with national policy.
- "52. The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities....."
- 3.10 Policies SP1 and SP1A of the adopted Local Plan seek the achievement of sustainable development.
- 3.11 With regard to Felixstowe, the 2013 Local Plan confirms:
- "4.28 Felixstowe with Walton is by far the largest town within the district and includes the Port of Felixstowe, a strategic employment site, being of both regional and national significance....." (with emphasis added).
- "4.29 Felixstowe has more people of retirement age and fewer people of working age than the norm, either in the rest of Suffolk or across the UK....."
- "Younger generations already have to look outside Felixstowe for careers and housing" (with emphasis added).
- "4.30 The population of Felixstowe is increasing slowly although household size is falling. Despite slow population growth there are, therefore, even more people looking for homes, and Felixstowe has more small households single people or couples particularly those that are key workers or first time buyers. The number and type of new homes provided in the town over recent years has not matched this increase in demand".
- "4.31 The growth of jobs in Felixstowe, driven by expansion of the Port, means that employment is now out of balance with the availability of housing. As a result, more of the new jobs are being taken up by people who are not able to find a home in Felixstowe, even if they would like one......" (with emphasis added).
- 3.12 Christchurch on the 27th February 2015 made Submissions to the then emerging Site Allocations and Area Specific Policies and the Felixstowe Peninsula Area Action Plan, relating to the site. In particular, section Five of the Submissions responded to the SHLAA "identifying" the site as being

"Poorly related to existing settlement"

3.13 The February Submissions also confirmed significantly that previously a Report on this matter was presented to the Local Development Framework Task Group on the 4th August 2008 (LPTG11/08). The Council's consideration of the ("option 4") land north of Candlet Road Felixstowe stated:

"on the whole option 4 has significant merit. It represents a good sustainable option that benefits from existing formal and informal recreational areas to the east as well as access to the town centre. It is also the closest area to the town centre and development might also ensure a stronger and more viable town centre given the increased usage of facilities there...the landscape, particularly the western part, is the least sensitive of all of the option and the existing

O - 7015 - 2980 - Preferred Policy FPP1: Housing - None

7015 Object

Housing Preferred Policy FPP1: Housing

wildlife corridor in the east can be built upon as part of a strategy of enhancing green infrastructure".

- 3.14 The 2008 Council Report confirms Christchurch's contention that the site is a highly sustainable location for growth, being immediately adjacent to the settlement boundary and close to a range of services and facilities within walking and cycling distance, therefore should be an allocated site.
- 3.15 The site is not a preferred allocation for residential development despite Core Strategy Policy SP21 confirming that (with our emphasis added)

"additional housing will be created"

"over a mixture of sites immediately abutting existing built up areas" and to

"create a more sustainable balance between housing and employment thereby providing an opportunity to reduce commuting"

- 3.16 Paragraph 4.31 of the adopted 2013 Local Plan confirms:
- "4.31 The growth of jobs in Felixstowe, driven by expansion of the Port, means that employment is now out of balance with the availability of housing. As a result, more of the new jobs are being taken up by people who are not able to find a home in Felixstowe, even if they would like one.

The 2001 Census revealed that there was a daily net inflow to Felixstowe of 2,719 workers. This comprised an outflow of 3,600 Felixstowe residents to jobs in Ipswich and elsewhere and an inflow of 6,319 who work in Felixstowe but live elsewhere".

- 3.17 The site abuts the urban area of Felixstowe, therefore is considered to be compliant with the aims and objectives of adopted Local Plan where Policy SP21 to create additional housing to address the "imbalance" set out in paragraph 4.31 (above) and constituting "organic and evolutionary growth".
- 3.18 Whilst adopted Policy SP21 confirms a

"strategy for a dispersed pattern of future development"

which is continued in the emerging Development Plan (the site is not identified as a preferred allocation) it is considered that a "dispersed pattern" is not the most sustainable growth option for Felixstowe, and is also not compliant with paragraph 52 of the Framework.

- "52. The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development. In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoining any such new development".
- 3.19 The Council confirm on page 98 of the AAP that the appeal proposals are a "discounted site" confirming that (DC/15/1128 OUT)

"Planning application refused 12.06.2015"

and on page 109 they identify a number of "constraints"

- * Flood zones 2 and 3 in NE corner of site
- * Area which may be of archaeological interest
- * BAP species (including badgers) have been recorded on site
- * Sites and monuments: Cowpasture Farm
- 3.20 In response, the proposals for the site
- (i) do not include development in the very small area identified within the flood plain,
- (ii) the archaeological "interest" in the site (would apply to all Preferred Options sites) can be the subject of planning conditions,
- (iii) the planning application reference DC/1/1128/OUT was supported by ecology Reports that confirmed no adverse impacts on any wildlife or protected species
- (iv) regarding 'Sites and monuments: Cowpasture Farm', as detailed on page 109 of the AAP, some of the Historic Environment Record (HER) entries, formerly known as Sites and Monuments Records (SMR) are recorded as 'Cowpasture Farm' in the site detail, including:

O - 7015 - 2980 - Preferred Policy FPP1: Housing - None

7015 Object

Housing Preferred Policy FPP1: Housing

- * HER entry MSF2946: detailed as Cowpasture Farm scatter of pottery and findspot
- * HER entry MSF2992: detailed as field system including a number of rectangular field boundaries, Cowpasture Farm (this is from cropmark evidence recorded to the west and at the western edge)
- * HER entry MXS22480: detailed as possible WWII anti-tank ditch visible from cropmark evidences, immediate west of Cowpasture Farm

The HER entries within a 2km radius of Land to the North of Candlet Road are detailed in Appendix two of the Archaeological Desk-based Assessment (DBA) prepared in February 2015. The location of the above HER entries and other HER entries referred to as Cowpasture Farm are illustrated and detailed in Appendix two.

- 3.21 Cowpasture Farm has merely been used as a place name/reference point within the HER. There is no specific entry on the HER for Cowpasture Farm or the buildings comprising the farmyard. Notably, Cowpasture Farm is not included on the National Heritage List for England (NHLE) as shown on the enclosed extract.
- 3.22 The AAP is supported by an Interim Sustainability Appraisal Report which (Table 1 page 4) sets out the sustainability "objectives". Twenty three such "objectives" are identified by the Council against which criteria it is considered that the proposals (insofar as they are relevant to urban extensions) are fully compliant.
- 4. RESPONSE TO THE STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT ("SHLAA") (SITE SUITABILITY)
- 4.1 It is noted that the SHLAA identifies, within Appendix D, that the Local Planning Authority has assessed some 71.20 hectares of land to the North of Candlet Road, Felixstowe. This assessment concludes that the land is

'poorly related to [sic] existing settlement'.

- 4.2 This statement is made in the complete absence of any concept or more detailed Masterplan.
- 4.3 Christchurch wish to rebut this conclusion.
- 4.4 Christchurch have an interest in approximately 31 hectares of land to the North of Candlet Road. This is only some 43% of the total site area assessed by the SHLAA and is thus materially different to the overall land assembly considered as part of the SHLAA.
- 4.5 Notwithstanding this point, the site (as part of the larger land assembly) has previously been considered by the Local Planning Authority and with particular regard to the 'Core Strategy Proposed location of strategic housing growth in Felixstowe and the Trimley villages'.
- 4.6 As confirmed previously a report on this matter was presented to the Local Development Framework Task Group on 4th August 2008 (LPTG 11/08). A copy of the Report is attached as Annexure 2 to these Submissions.
- 4.7 The site formed one part of a number of recommendations as to which sites should be the preference to the Council for the location of housing growth, indicating a preference toward larger developments, with related infrastructure incorporated into those schemes.
- 4.8 Appendix 1 to LPTG 11/08 provided some background in reaching that conclusion. Within this Appendix, it is stated that the landscape

'is not particularly attractive. It is, however, visible from a number of locations. Most are close distance and with the introduction of mitigation planting are not significant. The exception will be from the east where the close proximity viewpoints are in elevated locations and the topography would still allow views in to the area'.

4.9 The Appendix also states that

'the landscape in the part of the area to the east of Gulpher Road is more sensitive and shows a lower capacity to absorb development than the west. It also already has some recreational/green infrastructure value. In an area of current and predicted deficiencies of accessible natural greenspace, this part of area 4 may provide opportunities to address this'.

- 4.10 The proposals for the site, therefore, offer an opportunity for the successful integration of open space as part of the layout. This would be to the benefit of future residents, but also to the surrounding area by facilitating strong links to existing urban areas to the south and into the broader network of footpaths and other routes to the north.
- 4.11 The proposals bring about an access onto Candlet Road, giving a direct road link to the employment centre of the port, without encroachment onto existing communities. There is also direct access to the town centre without compromising existing road networks. Also, as referenced above, the proposals will enable greater integration of footpath networks and access to leisure facilities.

O - 7015 - 2980 - Preferred Policy FPP1: Housing - None

7015 Object

Housing Preferred Policy FPP1: Housing

4.12 Whilst only referenced in the Executive Summary to the Appendix, the report states that the site is

'separated from Felixstowe by the single carriageways of Candlet Road, but has Gulpher Road passing beneath it and the ability for crossings to be created. Development would be close to the town centre. Road access to the Port is easy although sustainable means of travel by cycle or on foot could need to be created'.

4.13 The Council's summary of this land assembly has the foresight to acknowledge that

'on the whole option 4 has significant merit. It represents a good sustainable option that benefits from existing formal and informal recreational areas to the east as well as access to the town centre. It is also the closest area to the town centre and development might also ensure a stronger and more viable town centre given the increased usage of facilities there...the landscape, particularly the western part, is the least sensitive of all of the option and the existing wildlife corridor in the east can be built upon as part of a strategy of enhancing green infrastructure'.

- 4.14 In summary, it is considered that the appraisal and then inception of the Masterplan has clearly demonstrated that the development of the land to the North of Candlet Road is not poorly related to the existing settlement, but can form an integrated part of the settlement.
- 4.15 The conclusion of the SHLAA and the (site suitability) emerging Plan and the Interim Sustainability Report is, therefore, clearly incorrect.
- 5. THE SUSTAINABILITY OF THE CANDLET ROAD SITE AND THE COUNCIL'S SUSTAINABILITY APPRAISAL
- 5.1 Christchurch commissioned Turley Sustainability earlier this year to carry out a detailed Sustainability Appraisal of the land north of Candlet Road (February 2015).
- 5.2 The Sustainability Appraisal clearly confirms that this location is a highly sustainable location for residential development, abutting the main area of Felixstowe, the largest town in the District.
- 5.3 The Turley Sustainability Appraisal also references (a copy of the Report is attached) the recommendations contained in the 2008 Report where the current Head of Planning Services at the Council (Philip Ridley) confirmed that the land north of Candlet Road Felixstowe that this site presented the most appropriate and sustainable option for the growth of the town.
- 5.4 It is particularly noted, that Mr Ridley did not favour the "dispersed pattern of development" as advocated by both the Local Plan (July 2013) and the emerging Site Allocations.
- 5.5 The Council have prepared an Interim Sustainability Appraisal Report (October 2015) to support the emerging AAP. The Sustainability Appraisal must be shown to be adequate. It is submitted that, when subject to detailed examination, it will become apparent that the Sustainability Appraisal is not adequate, particularly with regard to the way that the Sustainability Appraisal appraises the strategic alternatives. It is not clear from the appraisal that the Preferred Options chosen, there is no indication in the Sustainability Appraisal of the reasons why these specific choices have been made against potential alternative locations. As a consequence, there is no basis to say whether the Preferred Options would perform better, or worse, than the preferred options in the emerging Plan.
- 5.6 In other words, it cannot be concluded that the Council have properly taken into account reasonable alternatives and, essentially, this is why there is no basis for finding the Preferred Options to be sound.
- 6. ALTERNATIVE SITES (PREFERRED OPTIONS)
- 6.1 It is for each strategic site allocation promoter to satisfy the Inspector that the sites are deliverable. In terms of land at Candlet Road Felixstowe, as an omission site which should be included in the Local Plan, the following facts are relevant to consideration of its conformity to Paragraph 47 of the Framework "to boost significantly the supply of housing"
- * The site is available and is in the ownership of one party
- * The site has developer interest meeting the requirements of Paragraph 173 of the Framework.
- * There are not any technical reasons why this site should not be deliverable (highways, drainage, ecology etc).
- * The site will be relatively easy to develop in comparison to other sites.
- * The site benefits from good access to infrastructure and is a sustainable location for development affording good access to transport links and other facilities.
- 6.2 It is submitted that in summary form, the circumstances that justify the redrawing of the settlement boundary to enable housing development of some 560 dwellings (including affordable housing) to be delivered at Candlet Road are as follows:

O - 7015 - 2980 - Preferred Policy FPP1: Housing - None

7015 Object

Housing

Preferred Policy FPP1: Housing

- 1) The focusing of housing growth adjacent to Felixstowe represents a highly sustainable growth option.
- 2) The most sustainable strategy for accommodation of housing growth at Felixstowe is for new development to be accommodated either within the existing limits of the urban area, and then sustainable urban extensions such as the site.
- 3) It is considered that the site enables the redefinition of the settlement boundary that will endure for the long term and create a new defensible boundary.
- 4) The site is located near existing public transport routes and there remains the opportunity to enhance linkages which will further improve the sustainability credentials of the site.
- 6.3 It is indicated previously that there are fundamental concerns with regard to the adequacy of the preferred options site selection procedure. It is also submitted that a further area of concern relates to
- (i) the deliverability of the preferred options sites, in the context of further technical evidence that may be required (for example Transport assessments, air quality assessments and so on), and
- (ii) Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("the 1990 Act") obliges the decision maker, when considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting, or any features of special architectural or historic interest which it possesses.
- 6.4 In R (on the application of Forge Field Society) v Sevenoaks District Council [2014] EWHC 1896 (Admin), Lindblom J referred to this duty and the parallel duty under Section 72(1) of the 1990 Act in relation to development within a conservation area in the following terms with our emphasis added:
- ".... it is to recognise, as the Court of Appeal emphasised in [East Northamptonshire District Council v Secretary of State for Communities and Local Government [2014] EWCA Civ 137], that a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one. It is not irrebuttable. It can be outweighed by material considerations powerful enough to do so.

But an authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering".

6.5 This has not happened. Furthermore, paragraph 169 of the Framework requires the Local Planning Authority to have

"up to date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to the environment....."

7. CONCLUSIONS

- 7.1 It is considered, for the reasons outlined in this submission, that the land at Candlet Road should be allocated in the
- 7.2 By omitting the site, the Plan would fail to significantly boost housing supply and fail to meet the objectively assessed housing needs of the District (paragraphs 14 and 47 of the Framework).
- 7.3 It is submitted that the AAP document would be sound in securing the necessary delivery for infrastructure, and an appropriate delivery of new housing if land at Candlet Road is allocated for housing as part of an urban extension for Felixstowe.
- 7.4 The proposed release of land at Candlet Road represents the most sustainable, viable and ultimately deliverable option to achieve the required housing and infrastructure needs for Felixstowe and the surrounding area.
- 7.5 It is submitted, therefore, that the Candlet Road site should be a preferred location for housing, being an appropriate urban extension to Felixstowe where the other competing sites do not relate as well in terms of connections and accessibility to the town, that against this criteria the Candlet Road site is the most sustainable and appropriate option for the extension (growth) of Felixstowe.

Richard Brown MSc

O - 7015 - 2980 - Preferred Policy FPP1: Housing - None

7015 Object

Housing Preferred Policy FPP1: Housing

27th November2015

Annexures

- 1. Site plan
- 2. Local Development Framework Task Group Report on 04/08/08 (LPTG 11/08)
- 3 Masterplan

Summary:

It is considered the Council cannot demonstrate a 5 year supply of housing in accordance with the requirements of the Framework. The growth of Felixstowe, as promoted in the AAP, is not considered the most appropriate strategy for future development needs in the Peninsular, as there is no proper or sufficient analysis to lead to the conclusion that the land at Candlet Road should not be allocated for residential development. It cannot be concluded that the Council have properly taken into account reasonable alternatives and this is why there is no basis for finding the Preferred Options to be sound.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Land North of Candlet Road Felixstowe - Sustainability AppraisalFINAL.PDF YOR.2258.001.revE - Felixstowe Site location plan A3 130215.pdf YOR.2258.010.revJ - Indicative Masterplan FINAL 260615.pdf

O - 7161 - 3902 - Preferred Policy FPP1: Housing - None

7161 Object

Housing Preferred Policy FPP1: Housing

Respondent: Mr Andrew Corder [3902] Agent: N/A

Full Text:

As a resident of Trimley St Martin for over 20 years (having left Kesgrave due to over development) I would like to register my concerns surrounding the ridiculous quantity of new housing being proposed in and around our villiage.

I look forward to the official response concerning:

Schools

The schools that service the Trimley villiges are near to or over capacity with existing housing.

Trimley St Martin - There is currently a waiting list Trimley St Mary - Nearing maximum capacity

Felixstowe Academy - Nearing or exceeded capacity (regardless of what the Academy Trust says)

Road Safety

Both my children attend the Felixstowe Academy and, as Trimley St Martin is outside of the free school bus service, they have no option but to either get dropped off by car, cycle or walk.

At the time of day that they travel to school on their cycles the traffic is busy. Although there are some clearly marked cycle lanes for part of the journey, there are always many cars parked across them causing the children to cycle amongst the general traffic. This is a particular issue when they cycle past the Trimley St Mary Primary School.

If the proposed housing developments go ahead, traffic along this road will greatly increase; the high road is not able to be widened with the most dangerous areas being by the village shop, Trimley St Mary Primary School, Felixstowe Academy and the roundabout on Howlett Way (where in excess of 60 houses are now being built).

Any further houses will only increase the danger and will certainly increase the likelyhood of injury or death.

I am also extremely concerned about the times where the Port traffic is diverted through the Trimley villages; this occurs a number of times a year when there are roadworks and accidents on the A14 and Dock Spur Road.

The Trimley High Road is simply not wide enough to accommodate the additional traffic safely even with the present level of housing.

Jobs

There is no demand for the quantity of housing proposed; the Port is becoming more efficient and as such there are no plans for greatly increasing employment. The same applies to Felixstowe as a whole.

On this basis, the vast majority of traffic from the proposed housing developments will head out of the villages towards lpswich. We are on a peninsular and there is really only one way in and one way out of the area on the A14 or via rail; the passenger rail service is unreliable and inadequate with limited passenger paths available due to freight traffic.

Why build so many houses on a peninsular? Would it not make much more sense to build nearer Ipswich where most of the traffic will be going to?

Losing Identity

I grew up in Kesgrave, OLD Kesgrave. The residents of Kesgrave reluctantly accepted a small development on the Grange Farm estate. The original proposals have been dwarfed by what actually happened and now the area is regularly in the news for the terrible problems that people have due to congestion.

I fear the same in Trimley, we have chosen to live in a semi-rural location and want it to stay that way. Suffolk District Council stand to make millions of pounds from any development without any guarantee that the villages will benefit or have infrastructure improvement. Houses need to be built but close to employment and the roads that will quickly disperse the traffic; this is not Trimley.

To close, I think that the lack of notice or advertising of consultative meetings was very poor and was effectively under handed behaviour; this is not what I would expect from a council paid for by the tax payer.

I can only draw the conclusion that the Council are going through the motions and are intentionally trying to follow the minimum required process under the radar with the minimum of people finding out about the proposals. I cannot understand why all residents of affected areas are not written to so that all people old and young can express their comments. Very poor and misleading practice.

I look forward to your formal feedback concerning my comments.

O - 7161 - 3902 - Preferred Policy FPP1: Housing - None

7161 Object

Housing Preferred Policy FPP1: Housing

If the proposed housing developments go ahead, traffic will greatly increase; the high road is not able to be widened Summary:

with the most dangerous areas being by the village shop, Trimley St Mary Primary School, Felixstowe Academy and the

roundabout on Howlett Way.

There is no demand for the quantity of housing proposed; the Port is becoming more efficient and as such there are no

plans for greatly increasing employment. The same applies to Felixstowe as a whole.

Houses need to be built but close to employment and the roads that will quickly disperse the traffic; this is not Trimley.

Change to Plan

Appear at exam? Legal? Sound? **Duty to Cooperate? Soundness Tests** None

Not Specified Not Specified Not Specified Not Specified

O - 7167 - 505 - Preferred Policy FPP1: Housing - None

7167 Object

Housing Preferred Policy FPP1: Housing

Respondent: Save Felixstowe Countryside (Mr John Johnston) Agent: N/A

[505]

Full Text: SAVE FELIXSTOWE COUNTRYSIDE INPUT TO PREFERRED OPTIONS CONSULTATION

November 2015

Do you think that the Council has selected the most appropriate preferred options?

No. Save Felixstowe Countryside (SFC) cannot support the irreversible loss of grade 1 & 2 agricultural land - much needed for food production as global warming accelerates in forthcoming years. Nor can we support the proposed gradual erosion of what is probably the last country lane in Felixstowe, much loved & enjoyed by Felixstowe residents for walking, cycling & horse riding.

Can you suggest a more suitable approach than that outlined?

The fundamental driver for housing is to meet Govenment targets for housing in order to stimulate the economy. Housing is not for local needs but for predicted migrants to the area. Felixstowe is the wrong location for such high growth given;

* Felixstowe employment profile is distorted by a single massive employer whose employees are used to long distance travel. The many redundancies in Felixstowe go unannounced and silently disregarded whilst what little employment is "mooted" is heralded as "justification" for housing whether or not it comes to fuiting. Felixstowe is clearly "someones" preferred location. Not the residents.

* Demand for Felixstowe housing is the LEAST in the District evidenced by the fact it REMAIN the cheapest location in the District for housing. Housing is expensive all over the District in part due to individuals investing in & renting multiple properties - take a look at the Register of Councillors' interests of Suffolk Coastal Councillors, "Interest 5" available at; https://waveney.firmstep.com/default.aspx/RenderForm/?F.Name=jNzibiXCCa3&HideToolbar=1&CID=1&TAPC=147

* Felixstowe IS at the end on a peninsula, naturally constrained, and transport links shared with ever increasing port

* The promised rail passing place, an outcome from a Planning Enquiry as a pre-requisite for dock expansion has not materialised. Expansion is in place, no rail passing place. Imports are significantly accelerating and with it Lorry traffic.

* Nett commuting during the morning rush hour is outward from Felixstowe - more houses = more commuters. When there is an accident on the Felixstowe stretch of the A14 - it is gridlock!

* Traffic up & down the Felixstowe peninsula has increased significantly and commuters from Felixstowe contend with Lorries which pull out at the last minute and at a moments notice trying to overtake yet hardly able to do so.

* The Seven Hills interchange backs up to the A14 every morning from at least 7:30am till 9.00am for Felixstowe commuters wishing to travel north on the A12 from the A14. For traffic heading to the north of the District, Trimley St Martin will become a "rat-run" to avoid congestion, causing even more chaos outside Trimley St Martin school in the morning.

* Expansion at Martlesham will exacerbate current problems at the Seven Hills interchange worse. Flows from Martlesham joining the westbound carriageway to travel over the Orwell Bridge, already beyond capacity, create a continuous flow preventing traffic from Felixstowe travelling to Martlesham or beyond.

* Increasing the housing at Felixstowe will increase the differential between house prices in Felixstowe and the rest of the District causing a corresponding increase in commuters from Felixstowe prepared to travel to take advantage of the cheapest properties in the District.

* Getting an advance appointment at the GP is no longer possible since the new Health Centre was built. Only "on the day" appointments with a doctor may be booked if you enter the call queue at or close to 8am. After this, you need to call the following day. Whilst the mitigation of "we'll get more Doctors" - can they be got? We feel sure the Surgery would get the much needed Doctors today to relieve todays problems if they could so any mitigation promise of "we'll get more Doctors" cannot be delivered.

* Building more houses to support more migrants to commute from Felixstowe will only make matters worse. Strategic growth at Felixstowe is the wrong solution.

Are there any other alternative options that need to be considered?

The policy of restraint at Felixstowe should continue with strategic development encouraged to the North of the district where land is abundant and population densities lower.

Bentwaters is planned to be developed as a 380 Hectare employment site. This new development is larger than the CURRENT Felixstowe port which amounts to 340 Hectares. However, there doesn't appear to be any plan to provide housing which might be expected from efficient use of the site.

Do you agree with the findings of the sustainability appraisal assessments undertaken?

Do you have any other comments on the preferred options documents? Felixstowe Preferred Options document. Land North of High Street, Walton, Felixstowe

Site Area: 12.00ha SHLAA Reference: 451g also referenced as;

S4.5 - Land North of High Street Walton - Employment site

The area is grade 1 agricultural land and construction on this site would result in the irreversible loss of the best and most versatile agricultural land.

It also provides clear visual separation between Walton & Trimley St Mary. A simple road does NOT provide such a visual separation evidenced by the fact that today Walton High Road does not provide a strong separation - Trimley St Mary exists on both sides of Walton High Road, not just on one side.

O - 7167 - 505 - Preferred Policy FPP1: Housing - None

7167 Object

Housing Preferred Policy FPP1: Housing

Lane North of Conway Close, Felixstowe

Site Area: 3.38ha

SHLAA reference: 502e

The area is grade 1 agricultural land and construction on this site would result in the irreversible loss of the best and most versatile agricultural land.

Conway Close, Swallow Close and Upperfield Drive currently create a firm edge of the built up area of Old Felixstowe with the countryside to the north and must be retained, in the same way as SP26 protects Woodbridge.

The land constituting SHLAA reference 502e provides a visual separation between modern estate housing and the small country cottage developments on Gulpher Road & the country element of Ferry Road as well as the already identified Park Farm Cottages.

The site to the east has already fallen with significant loss of Countryside in the form of "site 166b" which should never have been allowed. If development of site 502e is permitted, development would cross the hard edge of Ferry Road and risk the gradual creep of housing across North Felixstowe eroding the tranquil nature of Gulpher Road, presently enjoyed by cyclists, horse riders & walkers alike. Perhaps that's someone's secret plan? This is contrary to the wishes of Felixstowe residents and has been the subject of public outcry in the past.

Land North of High Street Walton

Are the policy requirements justified and do they meet the needs of the local community?

The housing requiremets are not for the local community - they are for projected migrants and, as seen by the Felixstowe South Sea-front developments, "buy-to-let" properties.

They do not meet the needs of the local community as they are impacting the North Felixstowe landscape - an area identified by David Lock as what makes Felixstowe special and should be protected.

What is proposed is contrary to the needs & wants of Felixstowe residents

Summary:

The housing requiremets are not for the local community - they are for projected migrants and, as seen by the Felixstowe South Sea-front developments, "buy-to-let" properties.

They do not meet the needs of the local community as they are impacting the North Felixstowe landscape - an area identified by David Lock as what makes Felixstowe special and should be protected.

What is proposed is contrary to the needs & wants of Felixstowe residents.

Change to Plan

Sound? **Duty to Cooperate?** Soundness Tests Legal? Appear at exam? Not Specified Not Specified Not Specified Not Specified None

Attachments:

O - 7171 - 3908 - Preferred Policy FPP1: Housing - None

7171 Object

Housing Preferred Policy FPP1: Housing

Respondent: Glynis Hogan [3908] Agent: N/A

Full Text: Point 1. Eating into Green belt.

Point 2. Feel this will affect schools and GPs.

Also effects an drainage & noise polution, also impact on traffic.

Point 3. Less dwellings.

Point 4. Feel Felixstowe is a small town and people in the community will be affect by this.

Point 5. Unaware of this.

Point 6. As a member of the community I am concerned of the effects this will have on Trimley.

Summary: Point 1. Eating into Green belt.

Point 2. Feel this will affect schools and GPs.

Also effects an drainage & noise polution, also impact on traffic.

Point 3. Less dwellings.

Point 4. Feel Felixstowe is a small town and people in the community will be affect by this.

Point 5. Unaware of this.

Point 6. As a member of the community I am concerned of the effects this will have on Trimley.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

3947_001_Redacted.pdf

O - 7215 - 3923 - Preferred Policy FPP1: Housing - None

7215 Object

Housing Preferred Policy FPP1: Housing

Respondent: Artisan Planning & Property Services Ltd (Mr Leslie Agent: N/A

Short) [3923]

Full Text: object to this in principle and to its detail throughout the Plan Area. The Policy wording emphasises the implied flexibility

in relation to housing numbers with phrases such as 'at least the minimum' in respect of the Core Strategy numbers and then makes Plans for individual settlements drawn tightly around those various settlements to which a policy will apply which is unduly restrictive and is based very much upon those same housing figures being considered as very much a maximum number. There is little or no flexibility in that approach which is or holds the prospect for a sensitive and appropriate proposal for a sustainable form of development coming forward because of subsequent and unforeseen change in other land uses which means that land which had hitherto not been considered as available or for housing or for employment becomes available during the plan period. There is a need to cater for such eventualities and to provide a flexible policy where a case can be made for an alternative site to that allocated either within the same settlement or

other settlements within the same Plan area.

Summary: The Policy wording emphasises the implied flexibility in relation to housing numbers with phrases such as 'at least the minimum' in respect of the Core Strategy numbers and then makes Plans for individual settlements drawn tightly around

those settlements to which a policy will apply which is unduly restrictive and is based upon those same housing figures being considered as very much a maximum number. There is little or no flexibility in that approach which is or holds the prospect for a sensitive and appropriate proposal for a sustainable form of development coming forward because of

subsequent and unforeseen change.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

O - 7242 - 3926 - Preferred Policy FPP1: Housing - None

7242 Object

Housing Preferred Policy FPP1: Housing

Respondent: UKIP Suffolk Coastal Branch (Mr Keith Phair) [3926] Agent: N/A

Full Text: We wish to comment specifically on Preferred Policy FPP1.

Your Preferred Options Document (para 1.04) makes it clear that there is a requirement to permit developments on sites which have been identified and approved under Development Plans and related documents. Accordingly, any overestimation of demand for housing for the period until 2027 seems likely to unnecessarily blight areas around identified sites and lead developers to "cherry-pick" the most profitable of the identified sites rather than to prioritise developments which score best in terms of sustainability appraisals.

It is our view that the 2010-2027 "need" for housing in Suffolk Coastal is materially over-estimated at 7,900 units for the following reasons:

- 1. Population growth in Suffolk Coastal (and in the Felixstowe/Trimleys area in particular) has not reached the levels expected over the last 15 years. This is evidenced by census data.
- 2. The job creation assumptions which have underpinned the forecasts of housing "need" have also not met initial expectations, especially at BT (where employment on the site has been falling) and in SCDC's misplaced generalised expectations for growth in the financial services sector (which pre-dated the 2008 crisis). Accordingly employment growth has been lower than expected.
- 3. Current rates of net immigration to the UK are running at 336,000 people per year (ref. ONS statistics last week). This rate of net immigration has been substantially ahead of expectations and government rhetoric and yet, despite these record and unplanned rates of net immigration, demand for housing in Suffolk Coastal remains quite modest by comparison with areas closer to London. This is evidenced both by slower rates of increase in housing costs and the clear lack of demand for build-outs in locations where planning permissions have already been granted - such as the Ferry Road site, where outline permission was mistakenly granted in early 2014 despite widespread local objections and the site on Cliff Road near the golf club, where permission was granted in c.2007. It is also the case that many of the units in the Martello Park development in Sea Road (and other developments) were sold to buy-to-let investors, as well as second-homers, which are both classes of housebuyer that the Government's recent Autumn Statement is now belatedly (but actively) trying to discourage by some substantial changes to the tax regime. These seem likely to strongly discourage new buy-to-let investment and will also lead to divestments by existing buy-to-let investors and second-homers. It is my opinion that these tax changes could have a very material impact on the availability of housing stock in Suffolk Coastal and I very strongly urge SCDC to very closely study the effects anticipated on local housing supply as a result of these tax changes before committing to the identification of specific sites, because I think the tax changes will lead to a continuing release of under-used housing stock onto the market in Suffolk Coastal and will thereby satisfy a material element of expected "housing need".
- 4. Current rates of net immigration are, according to the Conservative Government (as well as UKIP and Migration Watch) "much too high"! This is also a widely held view amongst voters in the UK and the issue of immigration regularly features as their top concern. It is now settled Government policy that there will be a referendum before the end of 2017 on our continued membership of the EU, which is a political union which bears virtually no relation to the Common Market we voted for in 1975 and has therefore been foisted on the UK without voters being given any say in its creation and our membership of it. UKIP will be campaigning strongly for the UK to leave the EU, as will other crossparty campaigning groups and there is a reasonable chance that the country will vote to leave. In the event of a "leave" vote, we would hope and strongly expect that the net immigration flows into the UK of 336,000 pa (and rising) can be very substantially and quickly reduced, as a result of stopping the "open door" to all EU passport-holders and the introduction of a "level-playing field" points system for immigration based on the Australian system which prioritises immigrants who can provide those skills and resources that the economy actually needs. There is therefore a significant risk that the national estimates of housing need (of which the SCDC figures form a small subset) may also be overestimated in the event that the UK votes to leave.

We therefore recommend the following:

- a) SCDC should undertake an immediate and very careful study into the impact on the District's stock of second-homes and buy-to-let investment properties of the tax changes announced by the Chancellor in his 2015 Budgets and Autumn Statement. The outcome of this study should inform a downward revision of the 7,900 units "need" estimate, as a result of the estimated release back into normal use of second homes and buy-to-let properties during the plan period to 2027. b) The 7.900 unit "need" should be reviewed in the light of the other points above. There seems a clear case to review the Core Strategy "requirement" in the context of the below-expected rates of employment growth and the material uncertainties that may be at least partly resolved in the first year or two of the plan period. It would be a maladministration if the Council proceeded further with this process without taking account of the above impacts on supply and demand that have emerged in last few years.
- c) In the light of the above uncertainties concerning actual "need", SCDC should take full account of the expected application for 2,000+ units on Adastral Park (as noted in para 3.01) and impose an immediate moratorium on the grant of any further permissions for Greenfield sites (including all of those identified in the Felixstowe Action area Plan). On your own figures in 3.01, Adastral Park will satisfy some 2,000+ units out of the 3,465 for which planning permission remains to be granted prior to 2027 (based on your 7,900 units number). We would very strongly contend that no further sites should be identified until both the supply study and demand review suggested above have been carried out and reached clear conclusions, as it is likely that "need" has been over-estimated materially (especially in the "Leave EU" scenario). This Moratorium Period should last until at least late 2017 or 2018 (so that the suggested study of buy-to-lets and second homes can be carried out and taken into account, along with the Referendum outcome) and should only end when a reasonable proportion of the Adastral Park housing (say 25%) has been built and sold.
- d) We would suggest that it would be helpful to divide any housing sites to be included in Felixstowe Action Area plan

O - 7242 - 3926 - Preferred Policy FPP1: Housing - None

7242 Object

Housing Preferred Policy FPP1: Housing

into two groups, according to their rankings and desirability in terms of the Sustainability Appraisal:

i. Group 1 - sites that could be identified for residential development from the end of the Moratorium Period (if any are then required)

ii. Group 2 - possible future sites that are identified for future development, subject to any further demonstrated need before 2027. This list should be as short as possible in order to minimise blight and should not be made open to development before the Group 1 sites.

The purpose of the Moratorium and this grouping of sites is to avoid excessive blight via over-provision and, in a scenario in which all sites are not required, to avoid developers cherry-picking those sites which give them more profit but impose greater costs on the rest of society.

In the light of the demand uncertainties, and the probability of rising supply from the existing stock, we also strongly caution that the council should not proceed with the submission of the plan to the Planning Inspectorate before the outcome of the EU Referendum is known. If SCDC proceeds to the indicated timetable without properly considering the impact of the tax changes on BTL and second-homes announced in 2015, and/or assessing the impact of the EU Referendum outcome, this would be likely to waste significant amounts of public money and may well "set in stone" a plan which contains undesirable or redundant elements as a result of those foreseeable but unassessed events.

With regard to the individual sites that are the subject of other preferred policies, we feel it is for local residents to state their positions as individuals, rather than for UKIP to attempt to represent a collective view (beyond that stated above that the overall housing "need" has been over-estimated). Undoubtedly there are pros and cons to all sites in relative terms and it is the function of the sustainability assessments, and the consultation results, to highlight which sites look "better" in relative terms. A number of our members will be making such individual representations.

Summary:

SCDC should undertake an immediate and very careful study into the impact on the District's stock of second-homes and buy-to-let investment properties of the tax changes announced by the Chancellor in his 2015 Budgets and Autumn Statement.

In the light of the above uncertainties concerning actual "need", SCDC should take full account of the expected application for 2,000+ units on Adastral Park.

We would suggest that it would be helpful to divide any housing sites to be included in Felixstowe Action Area plan into two groups, according to their rankings and desirability in terms of the Sustainability Appraisal.

Change to Plan

We therefore recommend the following:

a) SCDC should undertake an immediate and very careful study into the impact on the District's stock of second-homes and buy-to-let investment properties of the tax changes announced by the Chancellor in his 2015 Budgets and Autumn Statement. The outcome of this study should inform a downward revision of the 7,900 units "need" estimate, as a result of the estimated release back into normal use of second homes and buy-to-let properties during the plan period to 2027. b) The 7.900 unit "need" should be reviewed in the light of the other points above. There seems a clear case to review the Core Strategy "requirement" in the context of the below-expected rates of employment growth and the material uncertainties that may be at least partly resolved in the first year or two of the plan period. It would be a maladministration if the Council proceeded further with this process without taking account of the above impacts on supply and demand that have emerged in last few years.

c) In the light of the above uncertainties concerning actual "need", SCDC should take full account of the expected application for 2,000+ units on Adastral Park (as noted in para 3.01) and impose an immediate moratorium on the grant of any further permissions for Greenfield sites (including all of those identified in the Felixstowe Action area Plan). On your own figures in 3.01, Adastral Park will satisfy some 2,000+ units out of the 3,465 for which planning permission remains to be granted prior to 2027 (based on your 7,900 units number). We would very strongly contend that no further sites should be identified until both the supply study and demand review suggested above have been carried out and reached clear conclusions, as it is likely that "need" has been over-estimated materially (especially in the "Leave EU" scenario). This Moratorium Period should last until at least late 2017 or 2018 (so that the suggested study of buy-to-lets and second homes can be carried out and taken into account, along with the Referendum outcome) and should only end when a reasonable proportion of the Adastral Park housing (say 25%) has been built and sold.

d) We would suggest that it would be helpful to divide any housing sites to be included in Felixstowe Action Area plan into two groups, according to their rankings and desirability in terms of the Sustainability Appraisal:

i. Group 1 - sites that could be identified for residential development from the end of the Moratorium Period (if any are then required)

ii. Group 2 - possible future sites that are identified for future development, subject to any further demonstrated need before 2027. This list should be as short as possible in order to minimise blight and should not be made open to development before the Group 1 sites.

The purpose of the Moratorium and this grouping of sites is to avoid excessive blight via over-provision and, in a scenario in which all sites are not required, to avoid developers cherry-picking those sites which give them more profit but impose greater costs on the rest of society.

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

O - 7251 - 3929 - Preferred Policy FPP1: Housing - None

7251 Object

Housing Preferred Policy FPP1: Housing

Respondent: The Limes & Grange Farms Trust (Mr Gavin Agent:

Rowlands) [3929]

Full Text: Submission of Representations to Suffolk Coastal District Council's Felixstowe Peninsula Area Action Plan - Preferred

Options Consultation Document (19th October 2015 to 30th November 2015)

I write on behalf of the landowners of a 1.7 hectare site at High Road, Trimley St Martin, Suffolk. Please find attached a

N/A

plan outlining the land referred to.

We are concerned with the soundness of the proposed Felixstowe Peninsular Area Action Plan (AAP) and the AAP's failure to allocate suitable sustainable sites. At a site specific level, the AAP fails to take the opportunity to allocate additional land at Trimley St Martin in accordance with the development strategy set out in the Core Strategy, which seeks to meet the 'minimum locally identified housing needs of the district for the period 2010 to 2027'. Although the site does not immediately abut the village boundary, the site in question is sustainable and suitable for development. In accordance with the presumption in favour of sustainable development and the significant need to boost the supply of housing we propose that it should be included as an Allocation.

The National Planning Policy Framework sets out "a presumption in favour of sustainable development" where Local Plans should meet objectively assessed needs and development which is sustainable should be approved without delay.

At the strategic level housing numbers and distribution are set out in the Core Strategy 2013. Core Strategy Policy SP2 notes that provision will be made for at least 7,900 new homes, distributed in accordance with the settlement hierarchy. The Policy commits to an early review in order to meet the full Objectively Assessed Housing Needs for the District. The Core Strategy also references the need for an extra 11,000 dwellings as identified in the work commissioned by Oxford Economics (OE) in 2010. The District still does not appear to have a published understanding of its current Objectively Assessed Need. The OE figure of 11,000 dwellings is now very old and predates the NPPF.

While it is noted that the Site Allocations and Area Specific DPD Issues and Options consultation commenced in 2015, it is of significant concern that this occurred ahead of the objectively assessed housing needs for the District being reviewed, updated and firmly established.

Policy FPP1 of the Felixstowe Peninsular AAP gives the impression that it is still working to the Core Strategy target of 7,900 and does not explain if it is actually working to OE figure or some other estimate.

Suffolk Coastal District Council published a Housing Supply Land Assessment in June 2015 for the period 1st April 2016 to 31st March 2021. It assesses the current five year +5% supply of housing land to be 5.12 years. Again, the current assessment is still based on the Core Strategy target of 7,900. As set out above, this is an acknowledged under estimate of the actual objectively assessed need, which in the absence of anything more up to date, on the best available evidence potentially suggests a target in the region of 11,000 dwellings.

Further, it appears to rely on the early unconfirmed delivery of some large developments with outline permission which are still subject to S106 agreements. If the 11,000 dwelling figure is applied then a five year supply in all probability does not actually exist. This suggests that the Felixstowe Peninsular AAP will struggle to demonstrate compliance with paragraph 182 of the NPPF at examination.

The overall spatial strategy set out in the Core Strategy (Policy SP2) provides for development to be focused in the Eastern Ipswich Plan Area, at Felixstowe and the Trimley Villages and shared between the market towns. Policy SP19 identifies that Felixstowe, Walton and the Trimley Villages will accommodate a proposed housing growth of 22%. Furthermore this was reiterated in the Strategic Housing Land Availability Assessment (March 2014).

The Felixstowe Peninsula AAP in Policy FPP1 identifies a minimum requirement for a further 807 units before 2027 as necessary to meet the Core Strategy requirement. However, as previously mentioned above these figures are a minimum and the AAP should be seeking to maximise delivery in sustainable locations in order to boost significantly the supply of housing as required by the NPPF. It is therefore contended as set out in more detail above, that policy FPP1 should be setting a more ambitious target, and in the absence of any more recent objectively assessed need, looking to a District target of 11,000 dwellings rather than the 7,900 derived from the Core Strategy.

The Felixstowe Peninsular AAP identifies 7 sites as preferred option allocations. Two of these are in Trimley St Martin and one in Trimley St Mary. The indicative capacities of these preferred site allocations suggests they could deliver 1,135 dwellings between them. However the delivery, quantum and likely timing of delivery is not certain. It is noted that the two largest sites, FPP8 Land off Thurmans Lane, Trimley St Mary and FPP4 Land north of Walton High Street, Felixstowe do not appear to be very advanced. With this in mind in order to maintain a realistic five year supply it will be important for the District to maintain the delivery of smaller sites which can readily come forward.

THE LAND

Trimley St Martin lies to the west of Felixstowe, between the A14 to the north-east and the railway line to the southwest. The village of Trimley St Mary lies immediately to the south east separated by a small gap. The two villages are immediately adjacent to Felixstowe and identified in the Core Strategy as Key Service Centres due to their extensive

O - 7251 - 3929 - Preferred Policy FPP1: Housing - None

7251 Object

Housing Preferred Policy FPP1: Housing

range of facilities and proximity to Felixstowe.

When considering the Trimley Villages and the opportunities for further allocations, Trimley St Mary is the larger of the two settlements and any significant further expansion may potentially undermine the sustainability of it as a village. Trimley St Martin being the smaller of the two settlements would appear to have greater capacity to absorb further growth. Trimley St Mary is also constrained by its proximity to Felixstowe, the ANOB designation to the south-west, the A14 to the north-east and its proximity to Trimley St Martin to the north. There are therefore few obvious alternative locations for the expansion of its physical development limits. On this basis, there is considerably more potential to look at a further extension of the physical development limits of Trimley St Martin.

In terms of the site itself it is in close proximity to employment opportunities and good public transport provision. Air quality appears to be an issue with the majority of the preferred allocation sites being close to Felixstowe and the A14. On the basis of the degree of separation, it would be reasonable to conclude that this site is likely to perform better in respect of air quality. The same principle applies in terms of noise and the existing buffer between the site and the A14. In addition given the scale of any development of the land, it would be unlikely to generate any highway safety or capacity issues which could impact on the quantum of development achievable and delay delivery.

It is clear that this site has many advantages over some of the preferred allocations and there are no known obstacles to it coming forward for development. It is in a sustainable location and could deliver much needed housing, including affordable housing.

The land is not included as a housing allocation and it is contended that it should be included on the basis that it is both sustainable and available. It is also contended that the AAP should be more ambitious in order to meet local housing need and it would be appropriate for the site to be included based on the presumption in favour of sustainable development.

Clearly this land has the potential to make a positive contribution towards housing delivery either as an additional allocation to help boost local housing supply, or alternatively as a reserve site to be brought forward in the event that other sites identified within the AAP fail to deliver the requisite amount of housing during the Plan period.

Furthermore this site is sustainable and deliverable and importantly could come forward. As such, we consider that it should be identified within the AAP either as an additional allocation site or as a reserve site.

We trust that the above is self-explanatory and will be given full consideration by the Council in the ongoing AAP preparation. In the meantime, we would be grateful to receive confirmation of receipt of these representations.

Summary:

Core Strategy Policy SP2 notes that provision will be made for at least 7,900 new homes, distributed in accordance with the settlement hierarchy. The Policy commits to an early review in order to meet the full Objectively Assessed Housing Needs for the District. However the AAP gives the impression that it is still working to the Core Strategy target of 7,900 and does not explain if it is actually working to OE figure or some other estimate. Promoting a site adjacent to Goslings Farm on High Road, Trimley St Martin.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Felixstowe Peninsula AAP - Representations_Redacted.pdf

O - 7252 - 312 - Preferred Policy FPP1: Housing - None

7252 Object

Housing Preferred Policy FPP1: Housing

Respondent: STAG (Mr Ian Cowan) [312] Agent: N/A

Full Text: Consultation Response: Felixstowe Peninsula Area Action Plan

I am making this response by e-mail because the online consultation system is cumbersome and confusing.

Here is my response to the Felixstowe Peninsula Area Action Plan Consultation Document.

One: The so-called housing need in the Felixstowe Peninsula Area Action Plan does not recognise that according to the 2011 Census the population of Felixstowe and the Trimley Villages shows a downwards instead of an upwards trend. This means that houses already built an in the pipeline should be more than sufficient for future needs.

Two: The Felixstowe Peninsula Area Action Plan dishonestly has ignored firm promises made in the Local Plan that the housing needs evidence base will be updated by 2015 to take account of Census movements. An honest re-evaluation would confirm my comments at One above.

Three: When housing numbers are mentioned in the Felixstowe Peninsula Area Action Plan they are usually prefixed by the weasel words "a minimum". Therefore, so far as Trimley St Martin is concerned, there will be a minimum of 70 houses opposite the Hand In Hand and a minimum of 330 houses at Howlett Way. Add the 66 houses currently being constructed at the Mushroom Farm and this will give a minimum of 496 extra houses in the village. There will also be a minimum of 1,810 throughout the Colneis Peninsula

Four: A minimum of 496 extra houses in Trimley St Martin is disproportionate to the number of houses proposed for other, larger conurbations.

Five: A minimum of 496 extra houses in Trimley St Martin will disproportionately increase the population of the village from around 1,900 to over 3,000.

Six: A minimum of 496 extra houses in in Trimley St Martin will completely alter the character of the village.

Seven: A minimum of 496 extra houses in Trimley St Martin will generate and extra 2,500 weekday traffic movements on an already busy High Road. Add a further 2,500 traffic movements from the minimum of 500 extra houses proposed for Trimley St Mary and Walton and traffic congestion along the whole length of the High Road will become considerably worse. Current traffic pinch points at Seamark Nunn, RS McColls and elsewhere could become even more dangerous than they already are.

Eight: Little thought seems to have been given to the provision of extra primary school places which will be required in both Trimley Villages from a minimum of 996 extra houses.

Nine: Little thought seems to have been given to the provision of extra medical facilities which will be required from a minimum of 996 extra houses / over 2,000 extra people in both Trimley villages, as well as elsewhere on the Colneis Peninsula. For example, the Grove Surgery is already so short of doctors that appointments can now only be made on the day, and it is not uncommon for all appointment slots to be fully booked by 8.20 am. The situation will only be acerbated by a minimum of 1,810 houses / over 3,600 extra people on the Colneis Peninsula.

Summary:

The so-called housing need in the Felixstowe Peninsula Area Action Plan does not recognise that according to the 2011 Census the population of Felixstowe and the Trimley Villages shows a downwards instead of an upwards trend. This means that houses already built an in the pipeline should be more than sufficient for future needs. The Felixstowe Peninsula Area Action Plan dishonestly has ignored firm promises made in the Local Plan that the housing needs evidence base will be updated by 2015 to take account of Census movements. An honest re-evaluation would confirm my comments.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot Specified

Attachments:

C - 7273 - 348 - Preferred Policy FPP1: Housing - None

7273 Comment

Housing Preferred Policy FPP1: Housing

Respondent: Trinity College Cambridge [348] Agent: Bidwells (Laura Hunter) [3941]

Full Text:

RE: Felixstowe Area Action Plan - Preferred Options Consultation Representations submitted by Trinity College Cambridge in respect of land north of Walton High Street, Walton, Felixstowe

Client: Trinity College, Cambridge

I write in response to the above consultation to submit representations on behalf of my client, Trinity College Cambridge, in respect of the draft allocation of Preferred Policy FPP4 - land north of Walton High Street, Felixstowe.

Preferred Policy FPP4 - Land North of High Street, Walton, Felixstowe

Trinity College supports the proposed allocation of the above site for residential development.

The allocation of the site will make an important contribution towards the pressing need for new housing and the Council's commitment to the delivery of at least 1,760 new dwellings in Felixstowe, Walton and the Trimleys between 2010 and 2027, as set out in the adopted Core Strategy.

The Core Strategy acknowledges that the growth of jobs in the area, driven by expansion of the Port, means that employment is now out of balance with the availability of housing. As a result, more of the new jobs are being taken up by people who are not able to find a home in Felixstowe, even if they would like one. This had led to an unsustainable increase of in-commuting from other towns on a daily basis. In addition, the population in the area is increasing at the same time as average house-hold sizes are falling, further increasing the need for housing. The number and type of new homes provided in recent years has not matched this increase in demand. Addressing these issues must be a priority for the Council through the AAP and my client will be supportive in helping it to do so.

The importance of boosting housing supply in Felixstowe is reaffirmed by the Council's commitment to pursuing an early review of the Core Strategy's strategic policies to address objectively assessed housing needs, which are higher than the levels of growth currently being planned for. More sites are likely to be required to come forward on the peninsula over and above those proposed for allocation in the AAP to meet those needs. It is therefore critical to prioritise the delivery of housing.

This site is one of a number identified by the Council as being suitable for development in the Strategic Housing Land Availability Assessment (SHLAA, 2014). My client supports the SHLAA's conclusion that the site is deliverable, being suitable, available and achievable for development within five years.

The suitability of the site for housing is reaffirmed by its sustainability. The Interim Sustainability Appraisal supporting the AAP consultation identifies that it is one of the most sustainable on the peninsula, scoring particularly well in terms of social effects by providing access to a wide range of key services including employment, health and education. This is no surprise, for the following reasons:

- The site is located opposite Felixstowe Academy and within walking distance of a number of primary and pre-school facilities and the wide range of shops and services and facilities available on Walton High Street.
- It is adjacent to the main bus route (Walton High Street) connecting Felixstowe, Walton and the Trimleys with neighbouring centres and within walking distance of both Felixstowe and Trimley railway stations.
- Of those available for development, the site is one of the closest to the Port of Felixstowe and its other employment areas, making it ideally placed to help the Council to reverse unsustainable patterns of in-commuting to Felixstowe
- The site is entirely contained by Candlet Road to the north, Walton High Street to the south, the A14 (Port of Felixstowe Road) to the west, and existing residential development to the east, limiting the potential for development to encroach into the wider countryside or have harmful landscape impacts. The site is largely enclosed by existing established hedgerows, which can be supplemented to provide further landscape containment.

The site is ideally suited for residential development and its allocation in the AAP is entirely consistent with the Core Strategy's objectives to deliver organic and evolutionary growth on sites immediately abutting existing built up areas.

Scale of residential development required

The AAP "expects" a minimum of 400 dwellings to be delivered on the site, well above the SHLAA's estimate of its maximum capacity of 360 dwellings. My client acknowledges this target and is bringing forward an outline planning application supported by a masterplan that will seek to deliver it. Nevertheless, it is of paramount importance to ensure the delivery of high quality living environments and, ultimately, sustainable communities. It will be necessary to take other constraints into account, such as the need to respect the settings of nearby listed buildings, the requirement to provide sufficient on-site ecological mitigation, recreational provision, play and open space and the lack of market demand for flatted accommodation in this location. These factors will impinge the quantum of development that can be achieved. We trust that the Council will work to ensure that density is informed by the constraints of the site and take a flexible approach, provided that proposals make every effort to make best use of the land available. By the time of presubmission consultation the emerging proposals for the site will be more advanced and its true capacity will be known.

Other site requirements

C - 7273 - 348 - Preferred Policy FPP1: Housing - None

7273 Comment

Housing Preferred Policy FPP1: Housing

My client has acute concerns about the range of other aspirations for the site contained in draft policy FPP4 and its supporting text. The AAP suggests that proposals should have regard to the need for a new link road between Candlet Road and High Street, new business units, retirement/sheltered accommodation or a care home, on-site open space and play equipment and delivery of an alternative facility for Felixstowe Rifle Club alongside the delivery of a minimum of 400 new homes.

Whilst my client is willing to cooperate with the Council wherever possible, the local planning authority must be realistic about what the site can deliver and prioritise the most important objectives for Felixstowe. We strongly contend that making the best use of the site to deliver housing and its supporting infrastructure should take primacy as a consequence of the need to support the Port, the Core Strategy's commitment to deliver a minimum of 1,760 dwellings in Felixstowe before 2027 and the likelihood of an increased requirement within the same timescale arising from the forthcoming early review. Seeking to impose a range of other requirements that are of less importance will only harm viability and, as a minimum, the amount of affordable housing that can be supported alongside CIL and other development costs.

The Council must consider that most of Felixstowe, Walton and the Trimleys are in an area assessed as being of "low" land value in the viability evidence prepared to support its CIL examination. This makes sites particularly sensitive to excessive policy burdens. Paragraph 173 of the National Planning Policy Framework (the Framework) makes clear that pursuing sustainable development requires careful attention to viability and costs in plan making and decision taking, stating that:

"sites identified in the Plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions and other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing landowner and willing developer to enable development to be deliverable."

The Council must be satisfied that the policy burdens it is seeking to impose on the site, in addition to the CIL charge that will apply, will not threaten its viability or the willingness of my client to release it for development. We have not seen any evidence to suggest that this has been fully taken into account and will need to ensure that it is addressed as proposals become more advanced.

My client has specific concerns in respect of the following matters.

Requirement for Business Units

Our client objects to the requirement for the site to deliver business units due to the potential impact on viability and the absence of evidence demonstrating a need. As a consequence the draft policy is unjustified and unsound in this respect and the requirement should be removed.

In accordance with Paragraph 160 of the Framework, the Council should have a clear understanding of the business needs within its area, working with neighbouring authorities to prepare and maintain a robust evidence base. The evidence base on employment needs is out of date, with the most recent economic assessments dating from 2011 (Suffolk's Local Economic Assessment) and 2010 (Oxford Economics Suffolk Coastal Profile and Outlook). In any case, neither of these studies identifies a need for more non-port related employment space on this site or in Felixstowe, or provides any support for the Council's contention that a lack of available non-port related facilities are preventing business growth in the area. Indeed, their main recommendations focus on the need to support the Port of Felixstowe, which the Core Strategy seeks to achieve by providing more housing for employees in closer proximity.

The aspiration to deliver business units on this site appears to have originated from the 'Local Strategy for Felixstowe' prepared by David Lock Associates in 2005 and published in 2006. This document was prepared to set out a 'vision' to guide regeneration in the future but was not in itself based on robust evidence of employment needs and is in any case now ten years old and out of date. The notes from the AAP Member Working Group Meeting held on 3 August 2015 confirm that the requirement to provide non-port related employment space is an 'aspiration' and the AAP should not cite the David Lock report as justification for pursuing it due to the time that has elapsed since it was prepared. As a consequence, the AAP does not refer to any evidence to support its request for business units to come forward.

At the current time there is in fact a clear over supply of business units in Felixstowe. My client has a long term interest in the local economy and a thorough understanding of local needs for business space. Indeed, my client owns four business units (comprising 4,099 sqft floorspace) at Searson's Farm, Trimley St Mary, which have remained empty for 12 months despite extensive marketing at competitive rates. These units are located away from the Port and would be ideal for existing or start-up enterprises unrelated to the logistics sector yet there has been little demand. This is despite a highly accessible location approximately 1.5 miles from junction 59 of the A14, 2.5 miles from the centre of Felixstowe and within walking distance of Trimley Railway Station.

Previous planning consents (1998) on Trinity College commercial expansion land at Clickett Hill Road had included B1 restrictions introduced to try and stimulate demand for B1 diversification on approximately 7 acres, which despite extensive marketing for well over a decade failed to achieve the policy requirement. Haven Gateway Partnership

C - 7273 - 348 - Preferred Policy FPP1: Housing - None

7273 Comment

Housing Preferred Policy FPP1: Housing

commissioned a Feasibility Study (Felixstowe Enterprise Village) from DTZ in 2004 which examined the potential for B1 business and incubator space on the Clickett Hill site. This study is submitted alongside these representations for references. It concluded the market for non-port related B1/incubator space to be non-viable without gap funding, a position which we consider has not changed to the present day. Although a B1 HQ building has now finally been constructed some 15 years later on part of the site, this is for a one in twenty year Port related HQ occupier; the remainder of the B1 allocation area (4.25 acres) has recently been granted planning consent for B8 Port related use.

There is also no evidence to suggest that business units are required to provide a noise attenuation buffer adjacent to the Port of Felixstowe Road and Candlet Road, as suggested by the draft policy. A planning application submitted for mixed use development of the site in 2013 (ref: C/13/0058) proposed residential development adjacent to these boundaries, with noise mitigated by an acoustic landscaped bund. The Council's Environmental Health Officers confirmed that these proposals were acceptable and impacts of noise were not cited as reasons for refusing the application. A similar approach is intended for the current proposals.

Taking account of the impacts that the provision of business units would have on the availability of land for housing, for which there is clearly a pressing need, and the viability of the scheme as a whole, in the absence of any evidence demonstrating need the Council must remove the requirement.

Requirement for Care Home / elderly accommodation provision

My client has no objection to bringing forward proposals which provide for a good mix of housing, including dwellings suitable for the elderly, but does object to the requirement to provide a care home or formal sheltered accommodation alongside the new dwellings. Again, it is unclear what evidence of need this requirement is based on because little justification is provided in the draft AAP. More importantly, the site does not have capacity to support the development of care home or non C3 use-class units alongside a minimum 400 new houses. The requirement is not deliverable, and therefore unsound. The policy wording should be amended to remove the requirement for a Care Home and formal sheltered accommodation and should instead focus on the delivery of a high quality residential development. Taking account of the commitments set out in the Core Strategy, the delivery of housing suitable for all members of the community should be the priority for this site.

Requirement for Open and Play Space

In bringing forward proposals for the development of the site, my client is aware of the need to provide substantial amounts of green open space on the High Street frontage to protect the setting of the nearby listed buildings. This will limit the amount of open space that can be provided elsewhere within the site whilst delivering the scale of residential development the Council is seeking.

My client is happy to bring forward a development that addresses with the Council's adopted play and open space standards, as set out in the Core Strategy under policies SP16 and SP17 and the Outdoor Playing Space SPG. However we object to the wording of paragraph 3.36 of Preferred Policy FPP4 which states 'developers will be required to consider local needs and requirements as part of their proposals alongside the nationally published standards regarding provision.'

It is not specified what 'nationally published standards' the Council is referring to. The policy is vague and moreover it is unnecessary, since any standards set out in national planning policy do not need repeating in the AAP. My client objects to inclusion of this section of the policy because it is unclear, unnecessary and unsound. We would encourage the Council to remove it altogether. Requirements in respect of open and play space can be secured by national planning policy, the Core Strategy and the SPG.

Requirement for the relocation of Felixstowe Rifle Club

My client acknowledges and supports the Council's aspiration to secure an alternative venue for the Felixstowe Rifle Club. As the Council will be aware, Trinity College has been actively working with the Rifle Club, securing planning permission for an alternative site on land that it owns north of the railway line, Nicholas Road, Trimley St Mary on the 13 March 2014 (Planning Ref: C/13/0967). Works are ongoing to progress the reserved matters application for the alternative site. Trinity College is a long term supporter of the Rifle Club, having leased the existing site and facilities on very favourable terms for many years, and is willing to continue working with the Council and the Club to establish an alternative venue in the interests of supporting the local area.

However, my client does not accept that funding replacement facilities for Felixstowe Rifle Club should be the responsibility of Trinity College Cambridge. Whilst the College has been and will continue to be a strong supporter of the Club, all parties must consider that doing so is not a viable commercial venture and is entirely unrelated to the core education and research objectives that the charity exists to promote. If the Council is seeking to impose a planning policy requiring relocation of the Rifle Club facilities, it should be prepared to take the associated costs for the project into account when negotiating other planning obligations associated with the development. The College will be taking forward discussions on this subject with Planning Officers shortly and will object to the proposed policy if cooperation is not forthcoming.

Requirement for a link road between Candlet Road and High Street

C - 7273 - 348 - Preferred Policy FPP1: Housing - None

7273 Comment

Housing Preferred Policy FPP1: Housing

The emerging masterplan being prepared for the site anticipates provision of a link road through the site with a new roundabout providing access to Candlet Road in accordance with the aspiration set out in the draft AAP. Doing so is likely to go beyond what is strictly necessary to provide access to a development on the site of the scale anticipated, which could be served from Walton High Street only, but it would address the Core Strategy's objective to deliver strategic improvements to the local road network.

Providing a roundabout access to Candlet Road will be more costly to develop than taking access from Walton High Street. The Council's Regulation 123 List (May 2015) makes clear that "strategic highway improvements including strategic cycling and pedestrian infrastructure" may be funded by CIL and will not be sought as planning obligations. Taking account of the sensitivities of sites in this area to viability, we would urge the Council to consider whether the proposed roundabout onto Candlet Road should be funded by CIL to ensure delivery of this and other obligations.

Requirement for a Transport Assessment and Air Quality Assessment

My client acknowledges that a Transport Assessment and Air Quality Assessment will be required to support a planning application for residential development. These works were undertaken for the previous planning application and both assessments concluded that residential development could be satisfactorily accommodated with appropriate mitigation, including an acoustic bund to the northern and western boundaries to protect residents from noise pollution arising from the dockspur roundabout, link road and Candlet Road. Updated Transport and Air Quality Assessments will be undertaken to support the current planning application.

Conclusion

In summary, my client is supportive of the proposed allocation of the site to provide a significant amount of new housing to help meet the minimum targets adopted in the Core Strategy, support the needs of the workforce of the Port of Felixstowe and help reverse unsustainable patterns of in-commuting. However, my client has real concerns about the range of other aspirations that proposals for the site are expected to have regard to and would contend that they are undeliverable and unviable. We would urge the Council to focus on the priority, which is to make the best use of land to deliver housing whilst protecting sites elsewhere.

We will of course continue to engage with Suffolk Coastal District Council as my client's outline planning application proposals continue to emerge.

Summary:

The allocation of the site will make an important contribution towards the pressing need for new housing and the Council's commitment to the delivery of at least 1,760 new dwellings in Felixstowe, Walton and the Trimleys between 2010 and 2027, as set out in the adopted Core Strategy. The importance of boosting housing supply in Felixstowe is reaffirmed by the Council's commitment to pursuing an early review of the Core Strategy's strategic policies to address objectively assessed housing needs, which are higher than the levels of growth currently being planned for.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

FEVStage 2 Final Report 27 Jan 05.pdf

C - 7285 - 3944 - Preferred Policy FPP1: Housing - None

7285 Comment

Housing Preferred Policy FPP1: Housing

Respondent: The Ravenshear Family [3944] Agent: Fletcher Barton Ltd (Mr William Barton) [3482]

Full Text:

We understand that at the time of the core strategy examination in public in 2013, the best available evidence of Objectively Assessed Need (OAN) was 11,000 new homes and this is considered to have increased since then. However on page 17 section 3.01 it states that at least 7,900 homes are to be provided. Bearing in mind this has now increased by over 3,000, we do not believe enough sites have been allocated.

Page 19 preferred policy FPP1 does not show any housing allocation for Bucklesham for the period 2015-2027. We would suggest that a minimum of 8 units are allocated to Bucklesham in line with previous contributions and housing distribution generally within the Felixstowe Peninsula.

Page 20 paragraph 3.16 would appear to conflict with paragraph 2.06 on page 14 and we suggest that paragraph 3.16 is amended to make it clear that in fulfilling local need and therefore housing numbers in the district, physical limit boundaries should be capable of being amended to include the allocated development.

Furthermore the restriction on development outside physical limits boundaries further highlights the problems identified above regarding shortage of allocated sites. In the example of Bucklesham there are very limited options for development within the existing settlement. As planning policies should be based on the most up to date evidence it is illogical to prevent development outside the current limits when it is inevitable that more land will be needed. Policy FPP2 sets an unnecessary policy obstacle to development that cannot be considered to be positively prepared given the lack of up to date evidence on housing need.

Appendix 4, insert map for Bucklesham, should be amended to show site 914 as previously put forward as part of the SHLAA process. The so called negative effects against the site should be addressed at planning application stage. Additionally to allow a small scale development and to reflect the poorer quality area of land from a landscape point of view being the area adjacent to the road and around the sewage works, we would suggest the special landscape area is amended as annotated on the enclosed plan. It should be noted that additional land could be made available to provide landscape features to mitigate the development on the adjoining land. The site and additional land is shown edged blue on the plan as attached.

Summary:

Page 19 preferred policy FPP1 does not show any housing allocation for Bucklesham for the period 2015-2027. We would suggest that a minimum of 8 units are allocated to Bucklesham in line with previous contributions and housing distribution generally within the Felixstowe Peninsula.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Preferred Options Bucklesham Map.pdf

O - 7306 - 3949 - Preferred Policy FPP1: Housing - None

7306 Object

Housing Preferred Policy FPP1: Housing

Respondent: Pigeon Investment Management Ltd [3949] Agent: Strutt & Parker (Mr Richard Clews) [3945]

Full Text:

1 INTRODUCTION

1.1 This representation has been prepared by Strutt Parker LLP on behalf of Pigeon Investment Management Ltd in respect of land at Trimley St Martin, Alternative Option Site 3022a in response to the six week public consultation (19th October 2015 to 30th November 2015) on the Felixstowe Peninsular Area Action Plan, Preferred Options Document, hereafter referred to as the Felixstowe Peninsular AAP. It should be read in conjunction with the following documents copies of which are contained within the appendices and summarised in the delivery statement section of this consultation response below:

- * Site Plan;
- * Indicative Layout Plan;
- * Preliminary Drainage Appraisal October 2015;
- * Desk-based Archaeological Assessment;
- * Landscape and Visual Assessment;
- * Preliminary Ecological Appraisal; and
- * Transport Report
- * Phase 1 Contamination Report

2 EXECUTIVE SUMMARY

2.1 As set out in these representations there are some fundamental concerns regarding the soundness of the Felixstowe Peninsular AAP and the Area Specific Policies Development Plan Document (DPD). These relate specifically to the approach adopted and the plan's failure to allocate suitable sustainable sites to address the issues arising from the failure to clearly identify up to date objectively assessed housing need for the District. There appears to be a conflict with Policy SP2 of the Core Strategy (2013) and the requirements of the National Planning Policy Framework(NPPF).

2.2 In respect of the Felixstowe Peninsular AAP, at a site specific level, the concern is that the plan fails to take the opportunity to allocate additional land at Trimley St Martin in accordance with the development strategy set out in the adopted Core Strategy. The site in question, Alternative Option Site 3022a, was identified as suitable in the SHLAA 2014.

It is sustainable, available and deliverable. It would represent a logical extension to the physical development limits of the village. In accordance with the presumption in favour of sustainable development and the need to boost significantly the supply of housing it is contended that it should be included as a Preferred Allocation.

3 POLICY BACKGROUND

3.1 The Site Allocations and Area Specific Policies Development Plan Document Preferred Options Consultation Document, October 2015 has been published for public consultation along with the Felixstowe Peninsular AAP. These two documents seek to provide the policies and allocations necessary to implement the strategic policies set out in the Suffolk Coastal District Local Plan - Core Strategy and Development Management Policies, July 2013 document. Together the Core Strategy, Site Allocations and Area Specific Policies Document and the Felixstowe Peninsula AAP will form the Development Plan for Suffolk Coastal District Council.

3.2 While this representation relates to the Felixstowe Peninsular AAP preferred options document and more specifically proposed allocations in the village of Trimley St Martin, it also has to be considered in the wider context of the planning policy framework for the whole of the District.

4 NATIONAL PLANNING POLICY FRAMEWORK

- 4.1 Paragraph 14 sets out that "a presumption in favour of sustainable development" is at the heart of the Framework and describes this as "a golden thread running through both plan-making and decision taking." It goes on to state that for plan- making this means:
- * "Local planning authorities should positively seek opportunities to meet the development needs of their area;
- * Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change..."

These requirements are repeated in more detail throughout the Framework. Paragraph 15 requires the presumption in favour of sustainable development to be applied to local plan policies so that development which is sustainable can be approved without delay.

- 4.2 The Core Planning Principles set out at paragraph 17 include a set of overarching objectives which should underpin plan making. Of particular relevance to this consultation response are that planning should be:
- * plan-led with up to date plans providing a practical framework for predictable and efficient decisions.
- * Not be about scrutiny but be a creative exercise.
- * Proactively drive sustainable development to deliver the homes the country needs.
- 4.3 Every effort should be taken to objectively identify and meet the needs of the area. Sufficient land suitable for development having regard to market signals should be
- 4.4 Paragraph 47 sets out a clear challenge to local planning authorities "to boost

significantly the supply of housing..." In order to achieve this they should ensure

that their Local Plan meets the full objectively assessed needs for the area and they should identify and annually update their five year housing supply.

4.5 For plan-making paragraph 151 advises that Local Plans should be consistent with the policies and principles of the Framework, "...including the presumption in favour of sustainable development."

O - 7306 - 3949 - Preferred Policy FPP1: Housing - None

7306 Object

Housing Preferred Policy FPP1: Housing

- 4.6 Paragraph 154 requires Local Plans to be "...aspirational but realistic" and paragraph 159 reminds local planning authorities that they "...should have a clear understanding of housing needs in their area."
- 4.7 Finally, for a local plan to be found sound at examination by an independent inspector the Framework at paragraph 182 advises that it should satisfy the following tests, namely that it is:
- * "Positively prepared the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- * Justified the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- * Effective the plan should be deliverable over its period and based on effective joint working on cross- boundary strategic priorities; and
- * Consistent with national policy the plan should enable the delivery of sustainable development in accordance with the policies in the Framework."
- 4.8 For the purposes of this consultation it is necessary to consider whether the Felixstowe Peninsular AAP satisfies the above objectives.

5 APPROACH TO HOUSING GROWTH

Core Strategy

5.1 At the strategic level housing numbers and distribution are set out in the Core Strategy.

Objective 2 states:

"To meet the minimum locally identified housing needs of the district for the period 2010 to 2027, taking into account existing and future economic,

environmental and social opportunities and constraints

In respect of this objective there are two important points to note. Firstly, that the Core Strategy seeks to meet the minimum locally identified housing need, and secondly, that it is a locally identified housing need for the plan period. 5.2 However, it is considered given the acknowledged short fall that the DPD and AAP should be based on the NPPF principles set out above including; to be aspirational; provide flexibility; positively seek to meet identified needs; and most importantly, to significantly boost housing supply. It is therefore considered that the Felixstowe Peninsular AAP should be setting its own, up to date and ambitious objectives.

- 5.3 Core Strategy policy SP2 sets out housing numbers and distribution. However, policy SP2 notes that provision will be made for at least 7,900 new homes, distributed in accordance with the settlement hierarchy set out in policy SP19. The policy then goes on to commit to an early review in order to identify the full objectively assessed housing needs for the District, to ensure this is met in so far as this is consistent with the policies of the NPPF.
- 5.4 The Inspector's report in respect of the Core Strategy Examination (June 2013) made it clear that an early review was essential as at the time the Council had identified an objectively assessed need of 11,000 dwellings. At paragraph 46 of the Inspector's Report he commented:

"Even if the theoretical capacity of all the sites included in the Strategic Housing Land Availability assessment (SHLAA), existing commitments potential brownfield opportunities, allocations carried forward from the previous Local Plan and a windfall allowance were taken into account, the provision would fall some way short of the 11,000 dwellings required."

5.5 At this point, the Inspector clearly gave consideration to suspending the Examination. However, he concluded that as none of the adjoining Councils had objected to the scale of housing proposed, that having a core strategy in place with an early review would be preferable to the alternative of suspension of the examination and the likely withdrawal of the plan.

5.6 While it is noted that the Site Allocations and Area Specific DPD Issues and Options consultation commenced in 2015, it is of significant concern that this occurred ahead of the objectively assessed housing needs for the District being reviewed, updated and firmly established. Policy CS2 states:

"An early review of the Core Strategy will be undertaken, commencing with the publication of an Issues and Options Report by 2015 at the latest. The review will identify the full, objectively assessed need for the District and proposals to ensure that this is met in so far as this is consistent with the policies in the National Planning Policy Framework."

5.7 On the basis of the currently available information the Felixstowe Peninsular AAP and the DPD are inconsistent with this adopted policy, and paragraph 158 of the NPPF which requires that the Local Plan is "...based on adequate, up-to-date and relevant evidence..."

5.8 Table 3.1 of the Core Strategy references the need for an extra 11,000 dwellings as identified in the work commission by Oxford Economics (OE) in 2010. It goes on to suggest that the review should identify land to meet the current acknowledged shortfall between the locally assessed requirement and the OE objectively assessed need (OAN). However, the District still does not appear to have a published understanding of its current OAN. The OE figure of 11,000 dwellings is very old and predates the NPPF. As advised in Planning Practice Guidance regarding housing need assessments, the household projections published by the Department for Communities and Local Government provide the starting point estimate of overall housing need (ID: 2a-015-20140306). The DCLG estimate may require adjustment to reflect factors affecting local demography and household formation rates. However, the Sub National Household Projections (2015) suggest a growth of 8,362 for the period 2010 to 2027 and this is not

referenced in the SAASP document or the AAP. This indicates that the Core Strategy figure promoted in the SAASP is out of date. While the DCLG figure is lower than the OE figure, it is clear that the Core Strategy proposal to provide 7,900 homes is lower than the most recent projections that the Council should be considering as a starting point for

O - 7306 - 3949 - Preferred Policy FPP1: Housing - None

7306 Object

Housing Preferred Policy FPP1: Housing

understanding its OAN. On the basis that the 2010 OE figure was 11,000, the reality is that the actual objectively assessed need figure is likely to be higher than 8,362 and that 7,900 would fail to meet the OAN.

5.9 Policy FPP1 of the Felixstowe Peninsular AAP gives the impression that it is still working to the Core Strategy target of 7,900 and does not explain if it is actually working to the OE figure or some other estimate and if so what that actually equates to for the AAP. On this basis there must be a concern that at examination the Felixstowe Peninsular AAP will not be found to comply with the tests set out in paragraph 182 of the NPPF, failing all the tests.

Five Year Housing Supply

5.10 In June 2015 Suffolk Coastal District Council published a Housing Supply Land Assessment. This covers the period 1st April 2016 to 31st March 2021 and identifies the current position with regard to identifying a five year +5% supply of housing land which it assess as 5.12 years.

5.11 Paragraph 3 acknowledges the supply in 2014 was 4.3 years this is a figure which has been borne out in appeal decisions as recently as September 2015

(APPJ3530/A/14/2225141). Fundamentally, the current assessment is still based on the Core Strategy target of 7,900. As set out above, this is an acknowledged under estimate of the actual objectively assessed need, which in the absence of anything more up to date, on the best available evidence suggests a target in the region of 11,000 dwellings. 5.12 In addition, it is also observed that the projections contained in table 3 still appear to rely on the early unconfirmed delivery of some large developments with outline permission which are still subject to S106 agreements. Taking these factors into consideration the five year supply with a modest surplus of 0.12 years, must reasonably be considered vulnerable to challenge at this time. If the 11,000 dwelling figure or even the lesser DCLG Household projection of 8,362 are applied then a five year supply in all probability does not actually exist and is at best 4.75 years.

5.13 Again, this point suggests that the Felixstowe Peninsular AAP will struggle to

demonstrate compliance with paragraph 182 of the NPPF at examination and reinforces the need to allocate additional land within the AAP.

Felixstowe Peninsular AAP

5.14 The overall spatial strategy set out in the Core Strategy (see policy SP2) provides for development to be focused in the Eastern Ipswich Plan Area, at Felixstowe and the Trimley Villages and shared between the market towns. Policy SP19 identifies that Felixstowe, Walton and the Trimley Villages will accommodate a proposed housing growth of 22%. Furthermore the Strategic Housing Land Availability Assessment (March 2014) acknowledges:

"The core Strategy expects the Market Towns and the Felixstowe and the

Trimleys area to accommodate a considerable proportion of the growth identified for the district to 2027".

5.15 The Felixstowe Peninsula AAP in policy FPP1 identifies a minimum requirement for a further 807 units before 2027 as necessary to meet the Core Strategy requirement. However, as previously mentioned above these figures are a minimum and the AAP should be seeking to maximise delivery in sustainable locations in order to boost significantly the supply of housing as required by the NPPF. It is therefore contended as set out in more detail above, that policy FPP1 should be setting a more ambitious target, and in the absence of any more recent objectively assessed need, looking to a District target of 11,000 dwellings rather than the 7,900 derived from the Core Strategy. Policy FPP1 should therefore be reworded to identify a higher overall target and as such an appropriate apportionment, for Felixstowe Peninsular. 5.16 It must be acknowledged that the AAP states at paragraph 3.13:

"The Felixstowe Peninsula AAP identifies over 1,100 units on the preferred sites outlined in this document. The Council consider it necessary to over allocate sites across the district to ensure that a five year land supply is maintained which is paramount. Over allocating also provides a range of sites, sizes and locations for development to allow a choice of location for those looking for a residential property. It also takes into account that the population is growing and that the Council's objectively assessed housing need is likely to increase in the future.

The delivery of sites will be monitored throughout the plan period to consider how the AAP is performing against the Core Strategy targets."

5.17 While this additional provision is welcome, it is still unclear if it will provide sufficient sites, which are available and deliverable, to enable the District to demonstrate a five year housing land supply in the short term. The current five year supply is not based on an up to date objectively assessed need. It is therefore contended, that opportunities should be taken to allocate more sustainable sites that can be delivered in accordance with Core Strategy spatial strategy so that the District can significantly boost its supply of housing as required by the NPPF. These sites should allow for variety in house types and

tenures to come forward to meet local needs and ensure choice and competition in the market for land (NPPF paragraph 47).

5.18 From the statement in paragraph 3.13 the Council appears to be acknowledging that the objectively assessed need is rising and site allocations should reflect this. It would therefore seem logical, and in the interests of good planning, for them to plan to meet this need now, by way of the allocation of further sustainable sites.

Felixstowe Peninsular AAP Preferred Site Allocations

5.19 The Felixstowe Peninsular AAP identifies 7 sites as preferred option allocations. Two of these are in Trimley St Martin and one in Trimley St Mary and are identified on the inset maps in the AAP. A summary of the 7 sites is set out below along with some brief summary observations in italics which are considered relevant to this consultation response: 5.20 Preferred Policy FPP3: Land at Sea Road, Felixstowe

Land is identified at Sea Road, Felixstowe for a mixed use development of commercial /tourism uses and residential dwellings. (Indicative Capacity 40 dwellings)

O - 7306 - 3949 - Preferred Policy FPP1: Housing - None

7306 Object

Housing Preferred Policy FPP1: Housing

It is noted that this is a mixed use site and residential development will be dependent on

There is also an issue with sewage capacity which may impact on viability. Finally if the market has to be relocated this could also significantly delay delivery.

5.21 Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

Land is identified north of Walton High Street for a mixture of residential units; including on site open space,

comprehensive landscaping and new business units. (Indicative Capacity 400 dwellings)

This site is dependent on the Rifle Club being relocated, requires a master plan to

include a link road which could in turn impact on viability. The policy acknowledges that it is likely to be a longer term opportunity. There are also air quality and sewage capacity issues to be resolved.

5.22 Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Land is identified to the north of Conway Close for a residential development. (Indicative Capacity 150 dwellings) The site could come forward, however, there are still sewage capacity and air quality issues to be addressed and the site is adjoined by heritage assets.

5.23 Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St

Martin Land is identified on Trimley High Road for residential development with on site open space to provide a village green. (Indicative Capacity 70 dwellings)

The site could come forward with access on to the High Street. The Public House is a listed building and therefore development proposals will have to be sensitive to its status which may limit capacity.

5.24 Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

Land is identified at Howlett Way for residential development with on site open space. (Indicative Capacity 360 dwellings)

Access to the site has not been identified in detail other than off Howlett Way. There are air quality issues and concerns regarding the setting of the Old Rectory. In addition there is a water main crossing the site. The site wraps round the Old Poultry Farm and the Old Rectory both of which may delay availability.

5.25 Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

Land is identified south of Thurmans Lane for residential development. (Indicative

Capacity 100 dwellings)

This site could come forward, again it is subject to air quality issues and the need to have regard to Mill Farm a Grade II Listed Building, it will also have to be accessed through the adjoining residential areas.

5.26 Preferred Policy FPP9: Land at Bucklesham Road, Kirton

Land is identified south of Bucklesham Road for residential development. (Indicative Capacity 15 dwellings)

This is a relatively small ribbon development site which could come forward. There are potentially issues to be resolved in respect of local sewage capacity in the village.

Assessment of Preferred Allocations

5.27 If the preferred site allocations indicative capacities are totalled up cumulatively this suggests they could deliver 1,135 dwellings between them. However, as set out above the delivery, and more importantly, the quantum and likely timing of delivery is much less certain. It is noted that the two largest sites, FPP8 and FPP4 do not appear to be very advanced. With this in mind in order to maintain a realistic five year supply it will be important for the District to maintain the delivery of smaller sites which can readily come forward.

6 ALTERNATIVE OPTION SITE 3022A

6.1 The site the subject of this representation, Alternative Option Site 3022a is just such a site and accordingly it is contended that it should be included as a preferred allocation on the basis that it is available and deliverable at the present time. In addition, it does not need to overcome the issues and constraints associated with some of the preferred allocations set out above and as such can contribute to the acknowledged shortfall in housing need, within the first five years of the Plan period. It is also contended that the AAP should be more ambitious in order to meet local housing need and it would be appropriate for the site to be included based on the presumption in favour of sustainable development

6.2 When considering the Trimley Villages and the opportunities for further allocations, Trimley St Mary is the larger of the two settlements and any significant further expansion may potentially undermine the sustainability of it as a village. Trimley St Martin being the smaller of the two settlements would appear to have greater capacity to absorb further growth. Trimley St Mary is also constrained by its proximity to Felixstowe, the ANOB designation to the south-west, the A14 to the north-east and its proximity to Trimley St Martin to the north. There are therefore few obvious alternative locations for the expansion of its physical development limits. On this basis, there is considerably more potential to be looking at a further extension of the physical development limits of Trimley St Martin.

6.3 In so far as this consultation is concerned, clearly a further allocation on the northwestern side of Trimley St Martin would make a positive contribution towards housing delivery. Alternative Option Site 3022a is in a sustainable location and is not environmentally sensitive. It does not represent a risk of coalescence and is a natural and logical extension of the settlement with clear and defensible boundaries. It is contained to the north-east by the allotment gardens, by the existing built development in the western corner, the road and established settlement to the south. As set out below it is a deliverable site with no obvious constraints or limitations. It is available and could come forward very quickly to make an almost immediate contribution to boosting local housing supply. As such, it is considered that it should be identified as a preferred

residential site allocation.

Sustainability Appraisal

6.4 It is surprising that Alternative Option Site 3022a did not score more highly in the Preferred Options Sustainability Appraisal when compared to the preferred sites listed above.

O - 7306 - 3949 - Preferred Policy FPP1: Housing - None

7306 Object

Housing Preferred Policy FPP1: Housing

6.5 The overall assessment concluded for site 3022a as follows:

"The site scores well in terms of economic effects due to its close proximity to employment opportunities and given relatively good public transport provision. The loss of Grade 2 agricultural soil results in a major negative environmental effect. However, there may be scope for mitigation."

6.6 In response to the major negative environmental effect of using Grade 2 agricultural land, it is clear that there is no difference with the conclusions for a number of preferred allocations. The proposed site is on the boundary of grade 2/3 agricultural land. All undeveloped and proposed allocation sites within Trimley St.Mary and Trimley St.Martin are on Grade 2 Agricultural Land. The proposed site is therefore no more important for protection as agricultural land than the allocated sites and may in fact be less desirable due to the size of the site and the overall quality. One of the objectives where the site did not score very favourably was in respect of SA Objective 8, to improve the quality of life and where people live. The SA comment here incorrectly assumed that the site will be accessed via the adjoining estate roads and as such could potentially result in a negative

impact for local residents. The reality, as set out in more detail in the delivery statement below, is that access can be provided directly on to High Road.

6.7 In respect of the site assessments and commentaries for the preferred allocations set out in the AAP, there appear to be a number of reoccurring themes which do not necessarily appear to be reflected in the sustainability appraisals. These are as follows:

Air Quality: This is clearly an issue with air quality assessments being required for the majority of the preferred allocation sites. This is an issue, particularly associated with proximity of the sites to the urban area of Felixstowe and major transport routes including the A14. In respect of the majority of the preferred allocations, and in particular the largest sites, these are more closely related to the A14 and Felixstowe than Alternative Option Site 3022a. As such, simply on the basis of the degree of separation, it can be concluded that site 3022a will perform better in respect of air quality.

Sewage Capacity: Sewage capacity is an issue raised by Anglian Water in respect of the Felixstowe sites and the site in Kirton. These sites potentially require improvement to the capacity of the foul sewer network. This does not appear to be an issue for the Trimley Villages and as set out in the delivery strategy below a preliminary foul and surface water drainage strategy has already been prepared for Alternative Option Site 3022a.

Noise: The potential impact of noise does not appear to have been given much consideration. It should be noted, that some of the preferred allocations lie adjacent to junctions on the A14. These sites or parts thereof may be susceptible to noise disturbance which may require mitigation and/or potentially reduce the developable area. Alternative Option Site 3022a, lies to the south of the A14 separated by the established allotment gardens and as such is unlikely to be adversely affected by noise from the road.

Transport Assessments: The larger preferred option allocations will require transport assessments to be carried-out. These may potentially reveal highway safety or capacity issues which could impact on the quantum of development achievable and delay delivery. This would not be necessary with the scale of development proposed on Alternative Option Site 3022a.

Heritage Assets: A number of the preferred option sites have a close relationship with existing heritage assets. In some cases the SA scored these relationships to be positive on the basis that the setting may be improved. It does not necessarily seem reasonable that a site that will have an impact on heritage assets should score more highly than one where heritage assets are unaffected as is the case with Alternative Option Site 3022a.

6.8 In conclusion it is clear from the above that Alternative Option Site 3022a has many advantages over some of the preferred allocation sites and there are no obstacles to it coming forward for development. It is in a sustainable location and could readily deliver much needed housing, including affordable housing, a significant social benefit, with very limited environmental consequences. This assessment further supports the case that it should be included as a preferred allocation.

Deliverability

6.9 Trimley St Martin lies to the west of Felixstowe, between the A14 to the north-east and the railway line to the south-west. The village of Trimley St Mary lies immediately to the south east separated by a small gap. The 2011 Census reported the population of Trimley St Mary as 3,673 and the population of Trimley St Martin as 1,932. The two villages are immediately adjacent to Felixstowe and identified in the Core Strategy as Key Service Centres due to their extensive range of facilities and proximity to Felixstowe.

6.10 Alternative Option Site 3022a, is situated on the north-western side of the village. It lies to the east of High Road, which runs parallel with the A14, connecting Felixstowe via the A1156 to Ipswich. The south-eastern side of the site abuts the residential properties of Mill Close with extensive allotment gardens lying to the north-east. The western corner of the site contains a group of existing dwellings and buildings used for commercial purposes. Beyond the site to the north-west are arable fields.

6.11 The site was in part submitted and considered under the SHLAA 2014 (site 383a) it was discounted due to concerns regarding vehicle access. Mill Close was not considered to be suitable as an accesses route and the Highway

O - 7306 - 3949 - Preferred Policy FPP1: Housing - None

7306 Object

Housing Preferred Policy FPP1: Housing

Authority was not in favour of direct access from High Road.

6.12 Since 2014 extensive work has been undertaken by Pigeon Investment Management Ltd to overcome the concerns relating to access and demonstrate the sites deliverability. A summary of the work to date is set out below which demonstrates the site's deliverability.

Indicative layout plan

6.13 An indicative layout plan, drawing number 015 - 015 - 00 has been prepared for the site (see Appendix). This shows how the site could be developed to deliver a range of house types including 18 affordable units. The proposed layout demonstrates that the site can deliver housing which respects the surrounding pattern of development. A strong frontage along high Road will provide a connection between the existing settlement and the group of existing buildings to the west of the site. This will be focused around the new highway access which will create an attractive and framed entrance into the development. The internal layout picks up on pedestrian connectivity through to Mill Close providing some additional frontage plots in the eastern corner of the site.

Elsewhere the proposed dwellings and street layout seeks to extend the established pattern of buildings along the site boundaries. Open space and gardens are provided along the north-eastern boundary in order to respect the presence of the allotment gardens. A large area of open space to serve the development (and the existing village) is proposed to the north which will provide a sensitive edge and integration with the open farm land beyond.

6.14 The layout demonstrates that an appropriate density of development can be provided along with a range of house types. The proposed layout can also meet garden space requirements and parking provision while respecting the amenities of adjoining residential properties.

Affordable Housing

6.15 The indicative layout shows the site could include 18 affordable units, including a variety of house types and sizes to meet local need. This will be a significant local benefit.

Heritage Assessment

6.16 The site does not lie with or adjacent to a conservation area and there are no Listed Buildings or other Heritage Assets on or nearby.

6.17 A desk-based assessment of archaeological significance was undertaken in November 2015. This report concludes that there is no evidence that proposed development will have any impact on the significance or setting of designated heritage assets of archaeological interest. It suggests that development could have an impact on the significance of undesignated heritage assets indicated by crop marks but that their significance is unlikely to be sufficient to preclude development and impact on them may be mitigated by the formulation of an appropriate archaeological strategy.

Flood Risk

6.18 The entire site is located within Flood Zone1; land assessed as having a low probability of flooding from fluvial sources. In addition, the site is not identified to be at risk from surface water or reservoir flooding, according to the Environment Agencies Flood Maps for Planning.

6.19 The development will not increase the risk of flooding post development as attenuation measures will be provided on site as part of the proposal to accommodate surface water run-off generated from the critical duration 1 in 100 year event, including an allowance for climate change.

Drainage Strategy

6.20 A preliminary drainage strategy has been prepared for the site which concludes that foul water from the development will be able to flow via gravity to the existing Anglia water sewer located in the High Road.
6.21 In respect of surface water drainage the underlying geology is expected to be of high permeability which will allow surface water run-off to discharge via infiltration. It identifies that an infiltration basin can be provided within the public open space to accommodate surface water run-off from the proposed highway. The surface water from roofs can be discharged via soakaways with permeable paving included to drain the private access roads, parking areas and driveways.

Landscape and Visual Assessment

6.22 A landscape and visual assessment of the site has been carried out and it concludes that there is capacity within the landscape to absorb change.

6.23 It suggest that given the nature, character and visual quality of the existing settlement edge and the poor quality of the existing edges of the site, it has a High Capacity to accommodate change, and the potential to enhance the settlement edge.

6.24 As such there are few constraints or issues in landscape and visual terms that would prevent the site being considered for development.

Preliminary Ecological Appraisal

6.25 A preliminary ecological appraisal has been carried out for the site. Ten habitats were identified during the Extended Phase 1 Habitat Survey including scattered broadleaved and coniferous trees, scattered scrub, poor semi-improved grassland, scattered bracken, tall ruderal, arable, introduced shrub, and species-poor intact and defunct hedgerows. In addition the field margins on-site provide opportunity for common invertebrates, reptiles, birds, and foraging / commuting bats. The report makes a series of recommendations in respect of mitigation measures and good practice during development however, no Phase 2 survey work was required. It is clear that there are no ecological barriers to the

sites development.

O - 7306 - 3949 - Preferred Policy FPP1: Housing - None

7306 Object

Housing Preferred Policy FPP1: Housing

Transport Report

6.26 A transport report has been prepared for the site which concludes that the proposed development can be served by an acceptable access to the highway network. The report confirms that the site is located in a sustainable location with bus stops on the boundary providing frequent services and footway connections to local facilities.

6.27 A new access can be provided onto High Road which complies with highway standards and provides adequate visibility and capacity. The existing local infrastructure can support the additional traffic generated, including through the use of more sustainable modes of transport as alternatives to the private motor car, such as cycling, walking and public transport.

6.28 The transport report confirms that access can be provided directly onto High Road and that it will not be necessary to take access via Mill Close as assumed in the assessment of the SHLAA 2014 (site 383a). This therefore overcomes the key reason for the site being discounted due to concerns regarding vehicle access.

7 CONCLUSION

7.1 As set out above and referred to elsewhere in this consultation response Alternative Option Site 3022a is available and deliverable. There are no obstacles to its development and clearly proposals are at an advanced state. The indicative layout confirms that a policy compliant scheme can be delivered which will include market and affordable housing, a large area of open space and improved connectivity.

7.2 As indicated in the landscape and visual assessment, the proposed development will be an attractive addition to the settlement, improving the quality of existing north western edges of the village.

7.3 The site is not in a flood risk area and can be suitably served by both foul and surface water drainage.

7.4 Development of the site will have no impact on designated heritage assets and any impact on undesignated assets can be mitigated. Additionally, there are no ecological barriers to the sites development.

7.5 The site is in a sustainable location with good access to local services and facilities. A new point of vehicle access, which accords with adopted standards, can be provided to High Road overcoming the original reason for the site being discounted in the SHLAA 2014 (site 383a).

7.6 Policy FPP1 of the Felixstowe Peninsular AAP is still working to the Core Strategy target of 7,900 rather than the 11,000 OE figure or an up to date objectively assessed need, as required by Core Strategy Policy SP2. In addition, the current five year supply is not based on an up to date objectively assessed need. It is therefore contended, that the Felixstowe Peninsular AAP should take the opportunity to allocate more sustainable sites that can be delivered in order to meet the requirement of the NPPF to "significantly boost its supply of housing" and assist in the maintenance of a five year supply of housing land.

These sites should allow for variety in house types and tenures to come forward to meet local needs and ensure choice and competition in the market for land (NPPF paragraph 47).

7.7 In conclusion, it is clear that Alternative Option Site 3022a has many advantages over some of the preferred allocation sites and there are no obstacles to it coming forward for development. It is in a sustainable location and could readily deliver much needed housing, including affordable housing, a significant social benefit, with very limited environmental consequences. It does not represent a risk of coalescence and is a natural and logical extension of the settlement with clear and defensible boundaries.

7.8 For the reasons set out above it is clear that Alternative Option Site 3022a should be included as a preferred allocation in the Felixstowe Peninsular AAP.

APPENDICES [see attached documents]

See Attachments to Representation Submission for following documents:

- A. Location Plan
- B. Indicative Layout Plan
- C. Preliminary Drainage Appraisal (October 2015)
- D. Desk-based Archaeological Assessment
- E. Landscape and Visual Assessment (November 2015)
- F. Preliminary Ecological Appraisal
- G. Transport Report
- H. Phase 1 Contamination Report

Summary:

Policy FPP1 of the Felixstowe Peninsular AAP gives the impression that it is still working to the Core Strategy target of 7,900 and does not explain if it is actually working to the OE figure or some other estimate and if so what that actually equates to for the AAP. On this basis there must be a concern that at examination the Felixstowe Peninsular AAP will not be found to comply with the tests set out in paragraph 182 of the NPPF, failing all the tests.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

Appendix H - Phase 1 Contamination Report (Pt2).pdf

Appendix E - FR 3659 Figure 4 Landscape Charcter Assessment.pdf

Appendix E - FR 3659 Figure 5 Photosheets_LR.pdf

Appendix E - Landscape and Visual Assessment Summary November 2015.pdf

O - 7306 - 3949 - Preferred Policy FPP1: Housing - None

7306 Object

Housing Preferred Policy FPP1: Housing

Appendix F - preliminary Ecology Appraisal Trimley.PDF

Appendix E - FR 3659 Figure 3 Landscape and Heritage Designations and Public Rights of Way.pdf

Appendix H - Phase 1 Contamination Report (Pt1).pdf

Appendix C - Prelimiary Drainage Appriasal Nov 15 trimley.pdf

Appendix G - Transport Statement (November 2015).pdf

Appendix E - FR 3659 Figure 2 Statutory Designations(1).pdf

Appendix E - FR 3659 Figure 1 Site Plan with Photo Locations(1).pdf

Appendix C - Prelimiary Drainage Appriasal Oct 15 trimley.pdf

Appendix B - Indicative Layout Plan (015-015-002).pdf

Appendix A - Location Plan Trimley.pdf

Appendix D - Trimley St Martin Desk Based Archaeological Assessment.pdf

C - 7346 - 2516 - Preferred Policy FPP1: Housing - None

7346 Comment

Housing Preferred Policy FPP1: Housing

Respondent: Natural England (Sir/ Madam) [2516] Agent: N/A

Full Text: Planning consultation: Preferred Options Public Consultation

Site Allocations and Area Specific Policies; Felixstowe Peninsula Area Action Plan

Thank you for your consultation on the above which was received by Natural England on 19 October 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.

WILDLIFE AND COUNTRYSIDE ACT 1981 (AS AMENDED)
CONSERVATION OF HABITATS & SPECIES REGULATIONS 2010 (AS AMENDED)

Site Allocations and Area Specific Policies Development Plan Document

Preferred Options Consultation Document (October 2015)

Preferred Option Policy SSP1: New Housing Delivery 2015 - 2027

We note the requirement for new housing delivery to meet, as a minimum, the Core Strategy requirement for 7,900 homes over the period 2010 - 2027.

Preferred Option SSP3 - Land rear of Rose Hill, Saxmundham Road Aldeburgh

The policy allocates 3ha of land at this location for the provision of a care home plus ten residential units. The site is about 300m from Alde-Ore Estuary Special Protection Area (SPA)/Ramsar site and Alde-Ore and Butley Estuaries Special Area of Conservation (SAC). The avoidance of strategic housing proposals at Martlesham and at Felixstowe Peninsula within 1km of the Deben Estuary and

Orwell Estuary respectively has been proposed as mitigation in part for adverse effects arising from increased recreational disturbance. Preferred Option SSP3 is within 1km of the Alde-Ore Estuary and therefore we advise that it would be required to have a Habitats Regulations Assessment at the application stage.

The Preferred Option is within Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). We note the requirements for design to take account of the sensitive landscape context of the development and advise that a Landscape and Visual Assessment (LVIA) would be required at the application stage. In summary, further detailed information will be required to assess the environmental impact of the proposed policy at this location.

Preferred Option SSP18 Ransomes, Nacton Heath (around 30 hectares)

The potential development within the AONB has significant landscape and visual impacts. We note that potential mitigation is stated to include de-designation of AONB land, rationalising existing AONB boundary and/or high quality design of buildings, structures and setting to reduce landscape impacts and impacts on potential historic interests. We advise that the policy should not rely on the

boundary of the AONB being amended. For clarity, it is Natural England's statutory responsibility to determine the designation of AONBs or to review existing AONB boundaries. For further information, please see following a link to our Designations Strategy:

http://publications.naturalengland.org.uk/publication/2647412.

However, we support the proposal for a development brief to be prepared by the District Council toprovide detailed planning guidance for the whole area, covering both the former employment allocation and the AONB element to allow for a more flexible approach to be progressed.

Preferred Option SSP30 Visitor Management - Deben Estuary

We agree with the policy to prevent increased recreational disturbance of Deben Estuary by preventing any additional car parking provision within a 1km distance of the estuary and by requiring proposed improvements to existing access points which would result in an increased level of recreational activity on the estuary to demonstrate that they will not result in any "significant effect" either on their own or in combination with other uses.

Preferred Option SSP31 Snape Maltings (replaces policy AP166)

The policy promotes the use of Snape Maltings for arts, recreation, and tourism-related uses. Snape Maltings is within Suffolk Coast and Heaths AONB and is adjacent to Alde-Ore Estuary SPA/Ramsar site and Alde-Ore and Butley Estuaries SAC. Proposals at this location will be required to demonstrate that they will not have an adverse impact on the protected landscape and designated sites and may require a Habitats Regulations Assessment and/or LVIA at application stage.

Habitats Regulations Assessment

We agree with the screening exercise carried out by the HRA that Preferred Options SSP3 (Land rear of Rose Hill, Saxmundham Road Aldeburgh) and SSP31 (Snape Maltings) are likely to have a significant effect on internationally designated sites. We note that the HRA advises that a study of existing visitor disturbance to birds, looking at the amount and origin of visitor activity as well as the birds' response is required for the vicinity of Snape Maltings; we agree

C - 7346 - 2516 - Preferred Policy FPP1: Housing - None

7346 Comment

Housing Preferred Policy FPP1: Housing

with the requirement for further evidence to inform a detailed assessment of this option.

We agree with the conclusion of the HRA (see section 5.1.1) which states that 'Site Allocation Document as a standalone document is likely to have a significant effect upon Alde-Ore Estuary European sites, with Preferred Policies SSP3 (land to the rear of Rose Hill, Saxmundham Road, Aldeburgh) and SSP31 (Snape Maltings) likely to have a significant effect by causing an increase in

disturbance to SPA-qualifying birds using the estuary'. However, we are unable to conclude no adverse effect on integrity of European sites from the subsequent statement that 'For both policies, further information and / or study might be able to inform a subsequent conclusion of no adverse effect upon the integrity of the European site' as this is not definite. We advise that either a rewording of the policies and/or further detailed assessment, including potential mitigation

measures, is required to enable us to have confidence in a conclusion of no adverse effect on integrity of European sites from these Preferred Options. We would be happy to give you further advice in this respect.

We support Preferred Option SSP30 (Visitor Management - Deben Estuary) regarding proposed improvements to access points such as slipways or jetties which may result in an increased level of recreational activity on the estuary needing to demonstrate that the proposal would not result in a likely significant effect on the notified features of the international site.

We note that the HRA states that mitigation for 'in combination' effects of new housing proposed in the Suffolk Coastal Core Strategy is being taken forward (section 3.3.3). In particular, we note that a Green Infrastructure plan is being considered by Suffolk Coastal District and Ipswich Borough to address the visitor management measures. In line with our current advice, we advise that this is not

sufficient to give confidence that the required mitigation measures will be delivered. There needs to be a commitment to having a mitigation strategy in place, informed by the green infrastructure plan, ideally by the time the plan is adopted or by a specified timescale shortly after the plan is adopted.

We advise this is necessary to give certainty that the mitigation measures will be delivered to ensure the plan is compliant with the Habitats Regulations and with paragraphs 113 and 118 of the NPPF.

We therefore suggest the following rewording:

'The Council will produce a mitigation strategy by {INSERT DATE} which will specify the measures required and how these will be delivered and funded'

Felixstowe Peninsula Area Action Plan

Preferred Options Consultation Document (October 2015)

Preferred Policy FPP1: Housing

We note that the Felixstowe Peninsula AAP identifies the requirement for 1,100 new dwellings on the preferred sites outlined in the document.

Preferred Policy FPP10: Port of Felixstowe

The policy promotes and safeguards land for employment, activities and operations which support the retention, expansion and consolidation of the Port of Felixstowe and the jobs associated with the Port. The expansion of the Port may have an impact on internationally designated sites. Please see our comments in Habitats Regulations Assessment below.

Preferred Policy FPP18: Felixstowe Ferry and Golf Course

We note that public access along the sea wall is to be retained within this area to ensure that sustainable links and connections are provided to maintain the unique character of the community and reduce the dominance of the motor car in this area. Please see our comments on England Coast Path below.

Preferred Policy FPP22: Martello Park to Landguard

We support the requirement for any future redevelopment of the port in this area to be carefully considered with the Landguard Partnership to ensure that the favourable condition of Landguard Common Site of Special Scientific Interest (SSSI) is maintained.

Preferred Policy FPP25: Access to the countryside

We support the policy which states that proposals which provide for the provision of green infrastructure in the Felixstowe Peninsula will be encouraged where these are well related to existing communities, offer good accessibility, connected to existing provision and provide alternative and accessible natural green space opportunities. We agree that proposals for new residential development in the Felixstowe Peninsula will be required to make provision of accessible natural green spaces as agreed by the District Council in conjunction with Natural England.

Habitats Regulations Assessment

We agree with the screening of the HRA which identified that Preferred Policy FPP10: (Port of Felixstowe) may have a likely significant effect on Stour and Orwell Estuaries SPA/Ramsar site as it stands. We agree with the conclusions of the HRA (see section 5.1.3) that the policy needs rewording to include a requirement for a Habitats Regulation Assessment to be provided in connection with proposals for expansion of Port of Felixstowe. We would be happy to give you

C - 7346 - 2516 - Preferred Policy FPP1: Housing - None

7346 Comment

Housing Preferred Policy FPP1: Housing

further advice in this respect.

We note that the HRA states that mitigation for 'in combination' effects of new housing proposed in the Suffolk Coastal Core Strategy is being taken forward (section 3.3.3). Please see our comments for the Site Allocations and Area Specific Policies Development Plan Document HRA above.

England Coast Path

We would appreciate the opportunity to discuss the requirements of the England Coast Path (ECP) with you in order to ensure that the requirements of the Coast Path and any mitigation measures arising from it, are clearly distinguished from any mitigation that might be required from the Council's proposed allocations. For more information on ECP, please see our website as follows:

https://www.gov.uk/government/collections/england-coast-path-improving-public-access-to-thecoast.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

Summary: We note that the Felixstowe Peninsula AAP identifies the requirement for 1,100 new dwellings on the preferred sites

outlined in the document.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

168976_168977 Preferred Options Consultation Felixstowe Peninsula AAP $_$ Site Specific Allocations_Redacted.pdf

C - 7510 - 4027 - Preferred Policy FPP1: Housing - None

7510 Comment

Housing Preferred Policy FPP1: Housing

Respondent: John Court [4027] Agent: N/A

Full Text: Preferred Policy FPP9 Site 451F SHLAA ref 325A Land at Bucklesham RO Kirton

Main chart data is out of date. Covered in a 'small print' inclusion of Violet Gardens (B+M) development 43 dwellings more than covers our minimum government requirements, and more individual projects will take place by 31.3.2027 being planned but not yet disclosed for 1&5 Burnt House Lane area & gardens.

being planned but not yet disclosed for Tab burnt house Lane area a gardens

Section 3.76

The footpath is needed anyway on the south side of Bucklesham Road as the existing footpath stops at 96 although

houses go to 137. The north side has layby's with cars.

3.77

Bungalows for downsizing will be built 'up to a price' as the potential occupier will have proceeds from a large house. We need small units that downsizing from a 3 bed semi in the village can afford after retirement, without a loan.

FPP9 Site 451F

This is minimum of 15 - does not include 'affordable' proportion required under planning so actual number will be greater

which will have further ramifications on services and quality of life of the local people.

Summary: Main chart data is out of date. Covered in a 'small print' inclusion of Violet Gardens (B+M) development 43 dwellings

more than covers our minimum government requirements, and more individual projects will take place by 31.3.2027

being planned but not yet disclosed for 1&5 Burnt House Lane area & gardens.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

C - 7512 - 4029 - Preferred Policy FPP1: Housing - None

7512 Comment

Housing Preferred Policy FPP1: Housing

Respondent: Mrs Y Smart [4029] Agent: N/A

Full Text:

Although I am interested in all areas of the above for this survey I concern myself in the main to the Trimleys.

I recognise the need for more housing in the area and looking at the report I do not object to the proposed preferred sites for residential development. However I make the following comments.

- As far as I can see there is no mention of school or health centre capacity being addressed.
- Provided open space as set out in report are included in developments then this should meet the needs of residents as such areas are an important aspect of residents well-being (with a knock on effect on health care needs being reduced)
- A decent allocation of one and two bed housing must be available to purchase (not just rent via Housing Assoc). There is a serious shortage of such housing for people to buy and actually live in themselves. Good balance of both needs required. NOTE The mushroom farm development has no 1/2 bed properties to purchase.
- Any buildings of architectural interest throughout the Peninsula must be retained. Such buildings are an important aspect of our heritage as well as a tourist attraction. Any 'lost' due to development is detrimental to the area.
- Shared spaces in Felixstowe I do not agree with extending area to Bent Hill will be of any benefit. The current area leaves much to be desired, especially to the hard of hearing as well as the blind / partially sighted
- I understand T.I.C. is to be reinstated on the seafront in a beach hut. An improvement to original location in the library.
- I am led to believe that there are no Councillors representing Felixstowe on Planning Committee. If this is correct then it is a sorry state of affairs that there is not one Councillor who has the necessary training to serve on such an important Committee

Summary:

- A decent allocation of one and two bed housing must be available to purchase (not just rent via Housing Assoc). There is a serious shortage of such housing for people to buy and actually live in themselves. Good balance of both needs required. NOTE The mushroom farm development has no 1/2 bed properties to purchase.
- Any buildings of architectural interest throughout the Peninsula must be retained. Such buildings are an important aspect of our heritage as well as a tourist attraction. Any 'lost' due to development is detrimental to the area.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

C - 7594 - 3451 - Preferred Policy FPP1: Housing - None

7594 Comment

Housing Preferred Policy FPP1: Housing

Respondent: Mr Michael Ninnmey [3451] Agent: N/A

Full Text:

In the previous response to the Consultation I requested whatever the "House Occupancy" was as E of E indicated back in 2004/5: which indicated that 50% of build was because less people in dwellings. What impact did 2008 crash have?

FPAAP

1 09

Sevenhill interchange suffers congestion already.

1.17

No reference to Health or wellbeing provision.

No reference on "Historic structures" A number at Risk.

2 02

No reference to Area pre- 1890 Walton has been erased!

2.10

By 2027! Children of many residents will have moved, because house building not meeting needs of local people, particularly low income young residents.

Para 3 Infrastructure Health & Sport. No proposal of provision.

2 11

The housing 1/4/2010 - 31/3/2015 has failed to deliver the agreed 106. Afford Housing.

FDD1

2010/13 1,003: no indication on map where? Misleading to 2027 land used.

FPP3

Alternative location for "open air market" visitor & tourist attraction.

Layout as Felix Multi plan?

Road facing Walton Hall: see Walton Green scheme:

- i) Retain rifle club, mitigate against noise on residents e.g acoustic barriers
- ii) Retain original coach house for Walton Hall!
- iii) HIDE NEW DEVELOPMENT BEHIND BOTH VALUED COMMUNITY ASSETS

FPP3 - 9

930 dwellings are to be added to rest of 1,003 plus windfall to access Felixstowe Port via jctn High road west/Garrison. This jctn has STANDING traffic back to HALF MOON Public hse NOW.

No mitigation shown on address this problem now a major concern in Walton - cum - Felixstowe is the Air Quality, (the H.R.W particularly has flood water through to the gravel.

Of increasing concern with VW rigging exhaust test.

Genera

- i) 106 agreement required provision of contribution to playspace and sports space: both of which are under provided. No indication as to how the C.I.L will make up for the shortfall and individual provision.
- ii) Community Hospital had 16 beds/no indication what extra to meet need of extra 5,000 people?
- iii) Map: fails to show position of the 1,003: The green lungs of Trimley St Martin, ST MARY, WALTON, OLD FELIXSTOWE at 2027 will only be PARKS & schools.
- iv) The buffer between settlements St Martin, ST MARY & WALTON gone.
- v) ECO-VILLAGE agreed in 2005 CS should be revised now or when 1,760 is reviewed.

4.06

The employment figures previously, have proved true?

How many "posts" are filled from outside FPAAP area? What will road traffic be by 2027? When the dual track completion date? Promise of a Ferry Quay to serve Harwich - Shotley - Felixstowe, ferry when?

No progress on supermarket provision?

No comment on underused land/council estate

Rail head in heart of Town H.R.W - Hamilton Rd, ST ANDREWS RD and GARRISON LANE.

Tourism

- i) Level footpath orwell to Deben fil in missing link of 300m? ASAP
- ii) Allow use of existing landing stages

Summary: 2010/13 1,003: no indication on map where? Misleading to 2027 land used.

Change to Plan

C - 7594 - 3451 - Preferred Policy FPP1: Housing - None

7594 Comment

Housing Preferred Policy FPP1: Housing

Appear at exam? Legal? Sound? **Duty to Cooperate? Soundness Tests** None

Not Specified Not Specified Not Specified Not Specified

Attachments:

M Ninnmey Comments.pdf

C - 7664 - 2581 - Preferred Policy FPP1: Housing - None

7664 Comment

Housing Preferred Policy FPP1: Housing

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text: Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

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Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7664 - 2581 - Preferred Policy FPP1: Housing - None

7664 Comment

Housing Preferred Policy FPP1: Housing

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

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- In the Trimleys, developer contributions have already been secured to help manage the existing deficit in Early Years places and proposals are being drawn up to deliver additional places. Further development of the scale proposed (530 dwellings) will necessitate significant additional provision. Under current statutory arrangements, this would necessitate 53 additional places. When Land North of Walton High Street (400 dwellings) is included, the number of places required under current arrangements would increase to 93.

The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

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In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

The County Council would appreciate consideration of ways in which this policy could be more supportive of early education in retail centres, as part of a balanced policy which also protects the vitality and viability of retail centres. Policy FPP17 appears to implicitly support early education already, and discussion with the District Council may conclude that this policy is sufficient.

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The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7664 - 2581 - Preferred Policy FPP1: Housing - None

7664 Comment

Housing Preferred Policy FPP1: Housing

[see table in attached document]

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Grange Primary School can also expand, though this school is also not well related to the proposed allocations or future directions of growth.

Paragraphs 37 and 38 of the National Planning Policy Framework reflect the need to minimise the length of journeys to school and, for major developments, primary schools should be located within walking distance of most properties.

The best long term solution would be to reserve 2.2ha land for a new 315-place primary school and early years setting in a location which is well related to housing growth. This would also enable provision to be made for future growth, with another school capable of expansion.

Options for reserving land for a new primary school include:

- Land within 'Land North of Walton High Street'
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Based on standard pupil multipliers, development of 1,135 dwellings would be expected to generate an additional 204 secondary school pupils and an additional 45 sixth formers.

Felixstowe and the Trimleys are served by Felixstowe Academy. Based on the forecast below, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from the development proposed in this Plan.

[see table in attached document]

All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

Health, Wellbeing and Social Care

A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

C - 7664 - 2581 - Preferred Policy FPP1: Housing - None

7664 Comment

Housing Preferred Policy FPP1: Housing

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

- * Ferry Road opposite site 502E
- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-

C - 7664 - 2581 - Preferred Policy FPP1: Housing - None

7664 Comment

Housing Preferred Policy FPP1: Housing

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

Archaeology. For the majority of sites, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies in line with NPPF. Although the significance of other sites and potential for encountering assets that may require preservation in situ is not lessened, sites identified at policies FPPP4 and FPPP6 have particular considerations at this stage.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

2015-11-23 Felixstowe AAP_SCC Final Response.pdf Felixstowe Sites SW.pdf Kirton Sites SW.pdf Kirton Sites FZ.pdf Felixstowe Sites FZ.pdf

C - 7669 - 2581 - Preferred Policy FPP1: Housing - None

7669 Comment

Housing Preferred Policy FPP1: Housing

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text: Felixstowe Area Action Plan - Preferred Options Consultation

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Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

C - 7669 - 2581 - Preferred Policy FPP1: Housing - None

7669 Comment

Housing Preferred Policy FPP1: Housing

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

- * Ferry Road opposite site 502E
- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-

C - 7669 - 2581 - Preferred Policy FPP1: Housing - None

7669 Comment

Housing Preferred Policy FPP1: Housing

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

Change to plan. SCC would encourage references to archaeology to be included in all site summaries as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request to the Suffolk County Archaeological Service.

Change to Plan

Change to plan. SCC would encourage references to archaeology to be included in all site summaries as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request to the Suffolk County Archaeological Service.

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Kirton Sites FZ.pdf
Felixstowe Sites FZ.pdf
Kirton Sites SW.pdf
Felixstowe Sites SW.pdf
2015-11-23 Felixstowe AAP_SCC Final Response.pdf

C - 7670 - 2581 - Preferred Policy FPP1: Housing - None

7670 Comment

Housing Preferred Policy FPP1: Housing

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text: Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

- * FPP4 Walton Field evaluation has identified an Early-Middle Bronze Age funerary landscape across the site, with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.
- * FPP6 Trimley Cropmarks on this site show that there are complex archaeological remains of pits, ditches and a coaxial field system and trackways of possible late prehistoric date (TYN 122). Archaeological remains are therefore known on the site, although they have not been fully characterised.

Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7670 - 2581 - Preferred Policy FPP1: Housing - None

7670 Comment

Housing Preferred Policy FPP1: Housing

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

Early Education

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The Government has indicated that it will legislate to double the number of hours' free childcare to 30. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

- In the Trimleys, developer contributions have already been secured to help manage the existing deficit in Early Years places and proposals are being drawn up to deliver additional places. Further development of the scale proposed (530 dwellings) will necessitate significant additional provision. Under current statutory arrangements, this would necessitate 53 additional places. When Land North of Walton High Street (400 dwellings) is included, the number of places required under current arrangements would increase to 93.

The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

- Development in the remainder of Felixstowe (150 dwellings North of Conway Close and 40 dwellings at Sea Road) can be managed by expanding existing settings.
- At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

The County Council would appreciate consideration of ways in which this policy could be more supportive of early education in retail centres, as part of a balanced policy which also protects the vitality and viability of retail centres. Policy FPP17 appears to implicitly support early education already, and discussion with the District Council may conclude that this policy is sufficient.

Primary Education

The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7670 - 2581 - Preferred Policy FPP1: Housing - None

7670 Comment

Housing Preferred Policy FPP1: Housing

[see table in attached document]

Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

Grange Primary School can also expand, though this school is also not well related to the proposed allocations or future directions of growth.

Paragraphs 37 and 38 of the National Planning Policy Framework reflect the need to minimise the length of journeys to school and, for major developments, primary schools should be located within walking distance of most properties.

The best long term solution would be to reserve 2.2ha land for a new 315-place primary school and early years setting in a location which is well related to housing growth. This would also enable provision to be made for future growth, with another school capable of expansion.

Options for reserving land for a new primary school include:

- Land within 'Land North of Walton High Street'
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- Land in another location in the Trimleys, well related to sustainable travel routes and the new housing.

Secondary and Sixth Form Education

Based on standard pupil multipliers, development of 1,135 dwellings would be expected to generate an additional 204 secondary school pupils and an additional 45 sixth formers.

Felixstowe and the Trimleys are served by Felixstowe Academy. Based on the forecast below, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from the development proposed in this Plan.

[see table in attached document]

All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

Health, Wellbeing and Social Care

A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

C - 7670 - 2581 - Preferred Policy FPP1: Housing - None

7670 Comment

Housing Preferred Policy FPP1: Housing

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[see attached document fo appendix]

Summary:

Education. General Comment. The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The NPPF establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Kirton Sites FZ.pdf 2015-11-23 Felixstowe AAP_SCC Final Response.pdf Felixstowe Sites SW.pdf Kirton Sites SW.pdf Felixstowe Sites FZ.pdf

C - 7671 - 2581 - Preferred Policy FPP1: Housing - None

7671 Comment

Housing Preferred Policy FPP1: Housing

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text: Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

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Suggested Amendments

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Education

C - 7671 - 2581 - Preferred Policy FPP1: Housing - None

7671 Comment

Housing Preferred Policy FPP1: Housing

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C - 7671 - 2581 - Preferred Policy FPP1: Housing - None

7671 Comment

Housing Preferred Policy FPP1: Housing

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All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

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A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

C - 7671 - 2581 - Preferred Policy FPP1: Housing - None

7671 Comment

Housing Preferred Policy FPP1: Housing

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

- * Ferry Road opposite site 502E
- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-

C - 7671 - 2581 - Preferred Policy FPP1: Housing - None

7671 Comment

Housing Preferred Policy FPP1: Housing

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

Early Education. Whilst there is uncertainty around the level of provision which will be required it is clear that at least one new Early Years setting will be required, within the Trimleys / Walton High Street and potentially one other, dependent on future primary school provision. When co-location isn't possible SCC's next preference is for settings to be well related to retail and community facilities. This is considered complementary to retail uses given the footfall it would generate.

Change to Plan

Change to Plan. Consideration is given to ways in which policies FPP15 and FPP17 could be more supportive of early education in retail centres as part of a balanced policy which also protects vitality and viability of these centres.

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Felixstowe Sites SW.pdf 2015-11-23 Felixstowe AAP_SCC Final Response.pdf Kirton Sites SW.pdf Felixstowe Sites FZ.pdf Kirton Sites FZ.pdf

C - 7674 - 2581 - Preferred Policy FPP1: Housing - None

7674 Comment

Housing Preferred Policy FPP1: Housing

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text: Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

- * FPP4 Walton Field evaluation has identified an Early-Middle Bronze Age funerary landscape across the site, with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.
- * FPP6 Trimley Cropmarks on this site show that there are complex archaeological remains of pits, ditches and a coaxial field system and trackways of possible late prehistoric date (TYN 122). Archaeological remains are therefore known on the site, although they have not been fully characterised.

Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7674 - 2581 - Preferred Policy FPP1: Housing - None

7674 Comment

Housing Preferred Policy FPP1: Housing

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

Early Education

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The Government has indicated that it will legislate to double the number of hours' free childcare to 30. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

- In the Trimleys, developer contributions have already been secured to help manage the existing deficit in Early Years places and proposals are being drawn up to deliver additional places. Further development of the scale proposed (530 dwellings) will necessitate significant additional provision. Under current statutory arrangements, this would necessitate 53 additional places. When Land North of Walton High Street (400 dwellings) is included, the number of places required under current arrangements would increase to 93.

The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

- Development in the remainder of Felixstowe (150 dwellings North of Conway Close and 40 dwellings at Sea Road) can be managed by expanding existing settings.
- At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

The County Council would appreciate consideration of ways in which this policy could be more supportive of early education in retail centres, as part of a balanced policy which also protects the vitality and viability of retail centres. Policy FPP17 appears to implicitly support early education already, and discussion with the District Council may conclude that this policy is sufficient.

Primary Education

The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7674 - 2581 - Preferred Policy FPP1: Housing - None

7674 Comment

Housing Preferred Policy FPP1: Housing

[see table in attached document]

Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

Grange Primary School can also expand, though this school is also not well related to the proposed allocations or future directions of growth.

Paragraphs 37 and 38 of the National Planning Policy Framework reflect the need to minimise the length of journeys to school and, for major developments, primary schools should be located within walking distance of most properties.

The best long term solution would be to reserve 2.2ha land for a new 315-place primary school and early years setting in a location which is well related to housing growth. This would also enable provision to be made for future growth, with another school capable of expansion.

Options for reserving land for a new primary school include:

- Land within 'Land North of Walton High Street'
- Land within another one of the Trimley sites
- Land in another location in the Trimleys, well related to sustainable travel routes and the new housing.

Secondary and Sixth Form Education

Based on standard pupil multipliers, development of 1,135 dwellings would be expected to generate an additional 204 secondary school pupils and an additional 45 sixth formers.

Felixstowe and the Trimleys are served by Felixstowe Academy. Based on the forecast below, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from the development proposed in this Plan.

[see table in attached document]

All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

Health, Wellbeing and Social Care

A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

C - 7674 - 2581 - Preferred Policy FPP1: Housing - None

7674 Comment

Housing Preferred Policy FPP1: Housing

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

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[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

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Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

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- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
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C - 7674 - 2581 - Preferred Policy FPP1: Housing - None

7674 Comment

Housing Preferred Policy FPP1: Housing

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

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[see attached document fo appendix]

Summary:

FPP1 General Comment. Primary Education. The distribution of housing creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school well related to housing growth, to ensure confidence in a long term solution for primary school provision. Trimley St Martin Primary School and Grange Primary School can expand but are not well related to proposed housing growth.

FPP1 Secondary and Sixth Form Education. Based on the forecast provided, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from development proposed in this plan.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

2015-11-23 Felixstowe AAP_SCC Final Response.pdf Felixstowe Sites SW.pdf Kirton Sites SW.pdf Felixstowe Sites FZ.pdf Kirton Sites FZ.pdf

C - 7675 - 2581 - Preferred Policy FPP1: Housing - None

7675 Comment

Housing Preferred Policy FPP1: Housing

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text: Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

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Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

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Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7675 - 2581 - Preferred Policy FPP1: Housing - None

7675 Comment

Housing Preferred Policy FPP1: Housing

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

Early Education

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The Government has indicated that it will legislate to double the number of hours' free childcare to 30. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

- In the Trimleys, developer contributions have already been secured to help manage the existing deficit in Early Years places and proposals are being drawn up to deliver additional places. Further development of the scale proposed (530 dwellings) will necessitate significant additional provision. Under current statutory arrangements, this would necessitate 53 additional places. When Land North of Walton High Street (400 dwellings) is included, the number of places required under current arrangements would increase to 93.

The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

- Development in the remainder of Felixstowe (150 dwellings North of Conway Close and 40 dwellings at Sea Road) can be managed by expanding existing settings.
- At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

The County Council would appreciate consideration of ways in which this policy could be more supportive of early education in retail centres, as part of a balanced policy which also protects the vitality and viability of retail centres. Policy FPP17 appears to implicitly support early education already, and discussion with the District Council may conclude that this policy is sufficient.

Primary Education

The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7675 - 2581 - Preferred Policy FPP1: Housing - None

7675 Comment

Housing Preferred Policy FPP1: Housing

[see table in attached document]

Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

Grange Primary School can also expand, though this school is also not well related to the proposed allocations or future directions of growth.

Paragraphs 37 and 38 of the National Planning Policy Framework reflect the need to minimise the length of journeys to school and, for major developments, primary schools should be located within walking distance of most properties.

The best long term solution would be to reserve 2.2ha land for a new 315-place primary school and early years setting in a location which is well related to housing growth. This would also enable provision to be made for future growth, with another school capable of expansion.

Options for reserving land for a new primary school include:

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Secondary and Sixth Form Education

Based on standard pupil multipliers, development of 1,135 dwellings would be expected to generate an additional 204 secondary school pupils and an additional 45 sixth formers.

Felixstowe and the Trimleys are served by Felixstowe Academy. Based on the forecast below, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from the development proposed in this Plan.

[see table in attached document]

All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

Health, Wellbeing and Social Care

A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

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Housing Preferred Policy FPP1: Housing

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

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The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

- * Ferry Road opposite site 502E
- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-

C - 7675 - 2581 - Preferred Policy FPP1: Housing - None

7675 Comment

Housing Preferred Policy FPP1: Housing

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

FPP1 Health, Well Being and Social Care. Our authorities can work together to ensure these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan. The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's local authorities to estimate localised needs for housing to meet policy requirements set for sites in this document.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

2015-11-23 Felixstowe AAP_SCC Final Response.pdf Kirton Sites SW.pdf Felixstowe Sites FZ.pdf Felixstowe Sites SW.pdf Kirton Sites FZ.pdf

C - 7676 - 2581 - Preferred Policy FPP1: Housing - None

7676 Comment

Housing Preferred Policy FPP1: Housing

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text: Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

- * FPP4 Walton Field evaluation has identified an Early-Middle Bronze Age funerary landscape across the site, with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.
- * FPP6 Trimley Cropmarks on this site show that there are complex archaeological remains of pits, ditches and a coaxial field system and trackways of possible late prehistoric date (TYN 122). Archaeological remains are therefore known on the site, although they have not been fully characterised.

Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7676 - 2581 - Preferred Policy FPP1: Housing - None

7676 Comment

Housing Preferred Policy FPP1: Housing

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

Early Education

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The Government has indicated that it will legislate to double the number of hours' free childcare to 30. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

- In the Trimleys, developer contributions have already been secured to help manage the existing deficit in Early Years places and proposals are being drawn up to deliver additional places. Further development of the scale proposed (530 dwellings) will necessitate significant additional provision. Under current statutory arrangements, this would necessitate 53 additional places. When Land North of Walton High Street (400 dwellings) is included, the number of places required under current arrangements would increase to 93.

The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

- Development in the remainder of Felixstowe (150 dwellings North of Conway Close and 40 dwellings at Sea Road) can be managed by expanding existing settings.
- At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

The County Council would appreciate consideration of ways in which this policy could be more supportive of early education in retail centres, as part of a balanced policy which also protects the vitality and viability of retail centres. Policy FPP17 appears to implicitly support early education already, and discussion with the District Council may conclude that this policy is sufficient.

Primary Education

The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7676 - 2581 - Preferred Policy FPP1: Housing - None

7676 Comment

Housing Preferred Policy FPP1: Housing

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C - 7676 - 2581 - Preferred Policy FPP1: Housing - None

7676 Comment

Housing Preferred Policy FPP1: Housing

Floods-Planning-protocol-Version-12.pdf

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[see attached document fo appendix]

Summary:

FPP1 Libraries. Libraries help create the sustainable, healthy communities referred to in Chapter 8 of NPPF. Under the CIL regime the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects library by library. In some rare cases, provision may be sought on site within very large developments, to be delivered through planning obligations.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
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Attachments:

Felixstowe Sites FZ.pdf
Kirton Sites FZ.pdf
2015-11-23 Felixstowe AAP_SCC Final Response.pdf
Felixstowe Sites SW.pdf
Kirton Sites SW.pdf

C - 7677 - 2581 - Preferred Policy FPP1: Housing - None

7677 Comment

Housing Preferred Policy FPP1: Housing

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text: Felixstowe Area Action Plan - Preferred Options Consultation

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Comments are set out below, under service headings.

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Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

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Suggested Amendments

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Education

C - 7677 - 2581 - Preferred Policy FPP1: Housing - None

7677 Comment

Housing Preferred Policy FPP1: Housing

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The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

- Development in the remainder of Felixstowe (150 dwellings North of Conway Close and 40 dwellings at Sea Road) can be managed by expanding existing settings.
- At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

The County Council would appreciate consideration of ways in which this policy could be more supportive of early education in retail centres, as part of a balanced policy which also protects the vitality and viability of retail centres. Policy FPP17 appears to implicitly support early education already, and discussion with the District Council may conclude that this policy is sufficient.

Primary Education

The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7677 - 2581 - Preferred Policy FPP1: Housing - None

7677 Comment

Housing Preferred Policy FPP1: Housing

[see table in attached document]

Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

Grange Primary School can also expand, though this school is also not well related to the proposed allocations or future directions of growth.

Paragraphs 37 and 38 of the National Planning Policy Framework reflect the need to minimise the length of journeys to school and, for major developments, primary schools should be located within walking distance of most properties.

The best long term solution would be to reserve 2.2ha land for a new 315-place primary school and early years setting in a location which is well related to housing growth. This would also enable provision to be made for future growth, with another school capable of expansion.

Options for reserving land for a new primary school include:

- Land within 'Land North of Walton High Street'
- Land within another one of the Trimley sites
- Land in another location in the Trimleys, well related to sustainable travel routes and the new housing.

Secondary and Sixth Form Education

Based on standard pupil multipliers, development of 1,135 dwellings would be expected to generate an additional 204 secondary school pupils and an additional 45 sixth formers.

Felixstowe and the Trimleys are served by Felixstowe Academy. Based on the forecast below, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from the development proposed in this Plan.

[see table in attached document]

All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

Health, Wellbeing and Social Care

A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

C - 7677 - 2581 - Preferred Policy FPP1: Housing - None

7677 Comment

Housing Preferred Policy FPP1: Housing

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

- * Ferry Road opposite site 502E
- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-

C - 7677 - 2581 - Preferred Policy FPP1: Housing - None

7677 Comment

Housing Preferred Policy FPP1: Housing

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

FPP1 Minerals and Waste Plan. The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

Felixstowe Sites SW.pdf
Kirton Sites SW.pdf
Felixstowe Sites FZ.pdf
Kirton Sites FZ.pdf
2015-11-23 Felixstowe AAP_SCC Final Response.pdf

C - 7678 - 2581 - Preferred Policy FPP1: Housing - None

7678 Comment

Housing Preferred Policy FPP1: Housing

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text: Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

- * FPP4 Walton Field evaluation has identified an Early-Middle Bronze Age funerary landscape across the site, with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.
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Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7678 - 2581 - Preferred Policy FPP1: Housing - None

7678 Comment

Housing Preferred Policy FPP1: Housing

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

Early Education

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The Government has indicated that it will legislate to double the number of hours' free childcare to 30. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

- In the Trimleys, developer contributions have already been secured to help manage the existing deficit in Early Years places and proposals are being drawn up to deliver additional places. Further development of the scale proposed (530 dwellings) will necessitate significant additional provision. Under current statutory arrangements, this would necessitate 53 additional places. When Land North of Walton High Street (400 dwellings) is included, the number of places required under current arrangements would increase to 93.

The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

- Development in the remainder of Felixstowe (150 dwellings North of Conway Close and 40 dwellings at Sea Road) can be managed by expanding existing settings.
- At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

The County Council would appreciate consideration of ways in which this policy could be more supportive of early education in retail centres, as part of a balanced policy which also protects the vitality and viability of retail centres. Policy FPP17 appears to implicitly support early education already, and discussion with the District Council may conclude that this policy is sufficient.

Primary Education

The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7678 - 2581 - Preferred Policy FPP1: Housing - None

7678 Comment

Housing Preferred Policy FPP1: Housing

[see table in attached document]

Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

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The best long term solution would be to reserve 2.2ha land for a new 315-place primary school and early years setting in a location which is well related to housing growth. This would also enable provision to be made for future growth, with another school capable of expansion.

Options for reserving land for a new primary school include:

- Land within 'Land North of Walton High Street'
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Secondary and Sixth Form Education

Based on standard pupil multipliers, development of 1,135 dwellings would be expected to generate an additional 204 secondary school pupils and an additional 45 sixth formers.

Felixstowe and the Trimleys are served by Felixstowe Academy. Based on the forecast below, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from the development proposed in this Plan.

[see table in attached document]

All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

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Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

C - 7678 - 2581 - Preferred Policy FPP1: Housing - None

7678 Comment

Housing Preferred Policy FPP1: Housing

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

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[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

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It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

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C - 7678 - 2581 - Preferred Policy FPP1: Housing - None

7678 Comment

Housing Preferred Policy FPP1: Housing

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

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Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

FPP1 Transport. SCC does not object in principle to any of these allocations on transport grounds, though significant additional information is required as these sites move towards planning permission. SCC will continue to work with the District Council to identify what information is needed to promote sustainable modes of travel and to manage the residual cumulative highway impacts of development. The County Council is working with SCDC to utilise existing Transport Assessments and Traffic Data to model existing traffic flows in AAP locations. This data will be checked and validated against data from Strategic Traffic Counters and other traffic data.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Kirton Sites SW.pdf Kirton Sites FZ.pdf Felixstowe Sites SW.pdf 2015-11-23 Felixstowe AAP_SCC Final Response.pdf Felixstowe Sites FZ.pdf

C - 7685 - 2581 - Preferred Policy FPP1: Housing - None

7685 Comment

Housing Preferred Policy FPP1: Housing

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text: Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

- * FPP4 Walton Field evaluation has identified an Early-Middle Bronze Age funerary landscape across the site, with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.
- * FPP6 Trimley Cropmarks on this site show that there are complex archaeological remains of pits, ditches and a coaxial field system and trackways of possible late prehistoric date (TYN 122). Archaeological remains are therefore known on the site, although they have not been fully characterised.

Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7685 - 2581 - Preferred Policy FPP1: Housing - None

7685 Comment

Housing Preferred Policy FPP1: Housing

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

Early Education

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The Government has indicated that it will legislate to double the number of hours' free childcare to 30. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

- In the Trimleys, developer contributions have already been secured to help manage the existing deficit in Early Years places and proposals are being drawn up to deliver additional places. Further development of the scale proposed (530 dwellings) will necessitate significant additional provision. Under current statutory arrangements, this would necessitate 53 additional places. When Land North of Walton High Street (400 dwellings) is included, the number of places required under current arrangements would increase to 93.

The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

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- At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

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The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7685 - 2581 - Preferred Policy FPP1: Housing - None

7685 Comment

Housing Preferred Policy FPP1: Housing

[see table in attached document]

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Grange Primary School can also expand, though this school is also not well related to the proposed allocations or future directions of growth.

Paragraphs 37 and 38 of the National Planning Policy Framework reflect the need to minimise the length of journeys to school and, for major developments, primary schools should be located within walking distance of most properties.

The best long term solution would be to reserve 2.2ha land for a new 315-place primary school and early years setting in a location which is well related to housing growth. This would also enable provision to be made for future growth, with another school capable of expansion.

Options for reserving land for a new primary school include:

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Based on standard pupil multipliers, development of 1,135 dwellings would be expected to generate an additional 204 secondary school pupils and an additional 45 sixth formers.

Felixstowe and the Trimleys are served by Felixstowe Academy. Based on the forecast below, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from the development proposed in this Plan.

[see table in attached document]

All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

Health, Wellbeing and Social Care

A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

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7685 Comment

Housing Preferred Policy FPP1: Housing

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

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- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-

C - 7685 - 2581 - Preferred Policy FPP1: Housing - None

7685 Comment

Housing Preferred Policy FPP1: Housing

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

FPP1 Surface Water Management. General Comment. SCC is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea. SCC comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided which show the EA flood map for surface water and locations where SCC has records of surface water flooding.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot Specified

Attachments:

2015-11-23 Felixstowe AAP_SCC Final Response.pdf Felixstowe Sites SW.pdf Kirton Sites SW.pdf Felixstowe Sites FZ.pdf Kirton Sites FZ.pdf

C - 7686 - 2581 - Preferred Policy FPP1: Housing - None

7686 Comment

Housing Preferred Policy FPP1: Housing

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text: Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

- * FPP4 Walton Field evaluation has identified an Early-Middle Bronze Age funerary landscape across the site, with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.
- * FPP6 Trimley Cropmarks on this site show that there are complex archaeological remains of pits, ditches and a coaxial field system and trackways of possible late prehistoric date (TYN 122). Archaeological remains are therefore known on the site, although they have not been fully characterised.

Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7686 - 2581 - Preferred Policy FPP1: Housing - None

7686 Comment

Housing Preferred Policy FPP1: Housing

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The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

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C - 7686 - 2581 - Preferred Policy FPP1: Housing - None

7686 Comment

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7686 Comment

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Floods-Planning-protocol-Version-12.pdf

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[see attached document fo appendix]

Summary:

FPP1 Surface Water Management It does not appear that existing flood risk will render any of the sites undeliverable but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to have early discussion with the SCC Floods and Water team, at an early stage. SCC has produced guidance on managing surface water issues through the development process and the SCC role in the development process.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Felixstowe Sites SW.pdf
Kirton Sites SW.pdf
Felixstowe Sites FZ.pdf
2015-11-23 Felixstowe AAP_SCC Final Response.pdf
Kirton Sites FZ.pdf

C - 7688 - 2581 - Preferred Policy FPP1: Housing - None

7688 Comment

Housing Preferred Policy FPP1: Housing

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text: Felixstowe Area Action Plan - Preferred Options Consultation

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Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

- * FPP4 Walton Field evaluation has identified an Early-Middle Bronze Age funerary landscape across the site, with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.
- * FPP6 Trimley Cropmarks on this site show that there are complex archaeological remains of pits, ditches and a coaxial field system and trackways of possible late prehistoric date (TYN 122). Archaeological remains are therefore known on the site, although they have not been fully characterised.

Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7688 - 2581 - Preferred Policy FPP1: Housing - None

7688 Comment

Housing Preferred Policy FPP1: Housing

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

Early Education

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The Government has indicated that it will legislate to double the number of hours' free childcare to 30. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

- In the Trimleys, developer contributions have already been secured to help manage the existing deficit in Early Years places and proposals are being drawn up to deliver additional places. Further development of the scale proposed (530 dwellings) will necessitate significant additional provision. Under current statutory arrangements, this would necessitate 53 additional places. When Land North of Walton High Street (400 dwellings) is included, the number of places required under current arrangements would increase to 93.

The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

- Development in the remainder of Felixstowe (150 dwellings North of Conway Close and 40 dwellings at Sea Road) can be managed by expanding existing settings.
- At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

The County Council would appreciate consideration of ways in which this policy could be more supportive of early education in retail centres, as part of a balanced policy which also protects the vitality and viability of retail centres. Policy FPP17 appears to implicitly support early education already, and discussion with the District Council may conclude that this policy is sufficient.

Primary Education

The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7688 - 2581 - Preferred Policy FPP1: Housing - None

7688 Comment

Housing Preferred Policy FPP1: Housing

[see table in attached document]

Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

Grange Primary School can also expand, though this school is also not well related to the proposed allocations or future directions of growth.

Paragraphs 37 and 38 of the National Planning Policy Framework reflect the need to minimise the length of journeys to school and, for major developments, primary schools should be located within walking distance of most properties.

The best long term solution would be to reserve 2.2ha land for a new 315-place primary school and early years setting in a location which is well related to housing growth. This would also enable provision to be made for future growth, with another school capable of expansion.

Options for reserving land for a new primary school include:

- Land within 'Land North of Walton High Street'
- Land within another one of the Trimley sites
- Land in another location in the Trimleys, well related to sustainable travel routes and the new housing.

Secondary and Sixth Form Education

Based on standard pupil multipliers, development of 1,135 dwellings would be expected to generate an additional 204 secondary school pupils and an additional 45 sixth formers.

Felixstowe and the Trimleys are served by Felixstowe Academy. Based on the forecast below, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from the development proposed in this Plan.

[see table in attached document]

All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

Health, Wellbeing and Social Care

A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

C - 7688 - 2581 - Preferred Policy FPP1: Housing - None

7688 Comment

Housing Preferred Policy FPP1: Housing

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

- * Ferry Road opposite site 502E
- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

C - 7688 - 2581 - Preferred Policy FPP1: Housing - None

7688 Comment

Housing Preferred Policy FPP1: Housing

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

FPP1 Waste Provision. Policy WDM17 of the Suffolk Waste Plan requires that development minimises waste and facilitates the sorting of waste and promotion of re-cycling. Individual sites can and will be required to consider how they meet those expectations. SCDC as Waste Collection Authority might also consider whether it would be justified to require that sites include on-site communal recycling facilities (bring sites). Under CIL, SCC will identify what provision is needed to serve the population growth and develop projects to meet this demand. It is expected that CIL funds will be sought for this purpose.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

Kirton Sites SW.pdf 2015-11-23 Felixstowe AAP_SCC Final Response.pdf Felixstowe Sites SW.pdf Felixstowe Sites FZ.pdf Kirton Sites FZ.pdf

C - 7715 - 3606 - Preferred Policy FPP1: Housing - None

7715 Comment

Housing Preferred Policy FPP1: Housing

Respondent: NHS England (Sir /Madam) [3606] Agent: N/A

Full Text: Dear Sir / Madam

Suffolk Coastal District Council Felixstowe Peninsula Area Action Plan - Preferred Options Consultation Document October 2015

1.0 Introduction

- 1.1 Thank you for consulting NHS England on the above Felixstowe Peninsula Area Action Plan Preferred Options Consultation Document October 2015.
- 1.2 In reviewing the context and content of the Document, the following comments are with regard to the Healthcare provision on behalf of NHS England Midlands & East (NHSE), incorporating the Clinical Commissioning Group (CCG) for Ipswich & East Suffolk and NHS Property Services (NHSPS).
- 2.0 Existing Healthcare Position in the Emerging Plan Area 2.1 The Document covers the administrative area of Felixstowe within Suffolk Coastal District Council which corresponds to the Ipswich & East Suffolk CCG.
- 2.2 Currently, within the Felixstowe Peninsula, healthcare provision incorporates a total of four GP practices, seven pharmacists, five dental surgeries and a community hospital.
- 2.3 These are the healthcare services available that the Area Action Plan must take into account in formulating future strategies.
- 2.4 Growth, in terms of housing and employment, is proposed across a wide area and would likely have an impact on future service provision. Existing GP practices do not have capacity to accommodate significant growth.
- 2.5 The healthcare services that are likely to be directly affected by the development strategies within the proposed Action Plan document are set out in Table 1 below.

Table 1: Summary of capacity position for healthcare services in the vicinity [See table in attached document]

- 2.6 Therefore it can be seen that the existing health infrastructure requires investment and improvement in order to meet the requirements/needs of the planned growth shown in this Action Plan document. The development would have an impact on healthcare provision in the area and its implications, if unmitigated, would be unsustainable.
- 3.0 Identification and Assessment of Policies and Strategies that have Healthcare Implications
- 3.1 In progressing the Felixstowe Peninsula Area Action Plan, care should be taken to ensure that emerging policies will not have an adverse impact on healthcare provision within the plan area and over the plan period.
- 3.2 In instances where major policies involve the provision of development in locations where healthcare service capacity is insufficient to meet the augmented needs (identified above), appropriate mitigation will need to be sought.
- 3.3 Policies should be explicit in that contributions towards healthcare provision will be obtained and the Local Planning Authority will consider a development's sustainability with regard to effective healthcare provision.
- 3.4 The exact nature and scale of the contribution and the subsequent expenditure by NHS England will be calculated at an appropriate time as and if schemes come forward over the plan period to realise the objectives of the Action Plan.
- 3.5 Before further progression and amendment of policies are undertaken, the Local Planning Authority should have reference to the most up-to-date strategy documents from NHS England and Ipswich & East Suffolk CCG, which currently constitute NHS England 5 Year forward view and the emerging CCG Strategic Estates Plan & Primary Care Strategy.
- 3.6 Plans and policies should be revised to ensure that they are specific enough in their aims, but are not in any way prescriptive or binding on NHS England to carry out certain development within a set timeframe, and do not give undue commitment to projects.
- 3.7 Notwithstanding this, there should be a reasonably worded policy with the emerging Action Plan that indicates a supportive approach from the Local Planning Authority to the improvement, expansion, extension or alteration of existing medical facilities detailed in table. This positive stance should also be indicated towards assessing those schemes for which NHS England deem necessary new bespoke medical facilities where such facilities are approved and agreed to in writing by NHS England. New facilities will only be appropriate where they accord with the latest up-to-date NHS England strategy documents.
- 4.0 Conclusions
- 4.1 This response follows a consultation by Suffolk Coastal District Council on Felixstowe Peninsula Area Action Plan.
- 4.2 In its capacity as the healthcare provider, NHS England has requested that the Local Planning Authority identifies policies and strategies that are considered to directly or indirectly impact upon healthcare provision and has responded with recommendations as to how policy should be shaped in the future.
- 4.3 Assuming the recommendations are incorporated wholly within the future Action Plan then NHS England would not which to raise an objection to the Felixstowe Peninsula Area Action Plan.
- 4.4 NHS England has also identified shortfalls in capacity at existing premises covered by the Action Plan. Provision needs to be made within the emerging Action Plan to address the impacts of development on health infrastructure and to ensure timely cost-effective delivery of necessary infrastructure improvements, in the interests of pursuing sustainable development.
- 4.5 The recommendations set out above are those that NHS England deem appropriate having regard to the projected needs arising from the Felixstowe Peninsula Area Action Plan. However, if the recommendations are not implemented then NHS England reserve the right to make representations about the soundness of the plan at relevant junctures during the adoption process.

Summary: Currently, within the Felixstowe Peninsula, healthcare provision incorporates a total of four GP practices, seven

C - 7715 - 3606 - Preferred Policy FPP1: Housing - None

7715 Comment

Housing Preferred Policy FPP1: Housing

pharmacists, five dental surgeries and a community hospital.

Growth, in terms of housing and employment, is proposed across a wide area and would likely have an impact on future service provision. Existing GP practices do not have capacity to accommodate significant growth.

The exact nature and scale of the contribution and the subsequent expenditure by NHS England will be calculated at an appropriate time as and if schemes come forward over the plan period to realise the objectives of the Action Plan.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

Scanned Representation

O - 6939 - 3234 - 3.13 - None

6939 Object

Housing 3.13

Respondent: Mrs Julie Cornforth [3234] Agent: N/A

Full Text: EADT 29/04/2014

Planners in east Suffolk have been accused of "disgraceful" failures after new figures revealed a significant underdelivery of affordable homes being built in the region. According to date obtained through a Freedom of Information request, just ONE of the affordable homes approved for development by SCDC in 2012/2013 has since been built. The statistics also show that only 26 of the 134 affordable homes approved between 2010 and 2013 were built - and of all

housing approved in that time, barely a fifth have been completed (20.9%)

Summary: EADT 29/04/2014

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housing approved in that time, barely a fifth have been completed (20.9%)

Change to Plan So why build all these houses if our kids have NO CHANCE of ever being able to buy one? You are sacrificing the best

food producing "GRADE 1 AGRICULTURAL LAND" on the basis of a lie (allegedly of course)

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6937 - 3234 - Sustainability Appraisal Information - None

6937 Object

Housing Sustainability Appraisal Information

Respondent: Mrs Julie Cornforth [3234] Agent: N/A

Full Text: In the Fxt Flyer, Oct 2015, John Goodwin commented on the earmarked housing for Walton, Trimley St Mary and

Martin.

He stated that "the big fear is that whilst these planning applications will be made singly the infrastructure needs for the existing High Road will conveniently be forgotten. The idea of between 700 and 800 new homes residents all requiring access to the High Road can only mean one thing, GRIDLOCK. Will planners from SCDC and Highways from SCC have the wit to get the roads made fit for purpose. The housing numbers quoted for our area are apparently

looked upon as the minimum requirement which I find scary.

Re: FXT Flyer, Oct 2015 - John Goodwin

Change to Plan Don't build all these houses on the peninsula. Just build "affordable housing" for our kids. Not 2nd homes for the rich!

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

Summary:

C - 7286 - 3944 - 3.16 - None

7286 Comment

Housing 3.16

Respondent: The Ravenshear Family [3944] Agent: Fletcher Barton Ltd (Mr William Barton) [3482]

Full Text:

We understand that at the time of the core strategy examination in public in 2013, the best available evidence of Objectively Assessed Need (OAN) was 11,000 new homes and this is considered to have increased since then. However on page 17 section 3.01 it states that at least 7,900 homes are to be provided. Bearing in mind this has now increased by over 3,000, we do not believe enough sites have been allocated.

Page 19 preferred policy FPP1 does not show any housing allocation for Bucklesham for the period 2015-2027. We would suggest that a minimum of 8 units are allocated to Bucklesham in line with previous contributions and housing distribution generally within the Felixstowe Peninsula.

Page 20 paragraph 3.16 would appear to conflict with paragraph 2.06 on page 14 and we suggest that paragraph 3.16 is amended to make it clear that in fulfilling local need and therefore housing numbers in the district, physical limit boundaries should be capable of being amended to include the allocated development.

Furthermore the restriction on development outside physical limits boundaries further highlights the problems identified above regarding shortage of allocated sites. In the example of Bucklesham there are very limited options for development within the existing settlement. As planning policies should be based on the most up to date evidence it is illogical to prevent development outside the current limits when it is inevitable that more land will be needed. Policy FPP2 sets an unnecessary policy obstacle to development that cannot be considered to be positively prepared given the lack of up to date evidence on housing need.

Appendix 4, insert map for Bucklesham, should be amended to show site 914 as previously put forward as part of the SHLAA process. The so called negative effects against the site should be addressed at planning application stage. Additionally to allow a small scale development and to reflect the poorer quality area of land from a landscape point of view being the area adjacent to the road and around the sewage works, we would suggest the special landscape area is amended as annotated on the enclosed plan. It should be noted that additional land could be made available to provide landscape features to mitigate the development on the adjoining land. The site and additional land is shown edged blue on the plan as attached.

Summary:

Page 20 paragraph 3.16 would appear to conflict with paragraph 2.06 on page 14 and we suggest that paragraph 3.16 is amended to make it clear that in fulfilling local need and therefore housing numbers in the district, physical limit boundaries should be capable of being amended to include the allocated development.

Furthermore the restriction on development outside physical limits boundaries further highlights the problems identified above regarding shortage of allocated sites. In the example of Bucklesham there are very limited options for development within the existing settlement.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

Preferred Options Bucklesham Map.pdf

S - 7102 - 3314 - 3.20 - None

7102 Support

Housing 3.20

Respondent: Lorna Adamson [3314] Agent: N/A

Full Text:

Comments on the Felixstowe Peninsula Action Plan

FPAP 3.07 I welcome the aim to preserve as far as possible prime agricultural land for food production. FPAP 3.20 I welcome the statement that proposals for new residential development outside the physical limits boundaries will be strictly controlled in accordance with national planning policy and the strategy for the countryside as set out in Core Strategy policy SP29.

I welcome the statement that extending the boundaries further was considered inappropriate because this may lead to further development in locations which are not well related to the existing settlements, services and facilities and lead to new building encroaching into the countryside.

FPAP 3.26 to 3.38 Land north of Walton High Street I am concerned at the loss of prime grade 1 and 2 agricultural land with the proposals for this site when 3.07 states the aim to preserve to preserve prime agricultural land for food production. I am not clear what 'mitigation may offset the loss of greenfield land of Grade 1-2 Agricultural soil classification'. I am also concerned about the potential for very heavy traffic on the High Road opposite Felixstowe Academy. The High Road is the main route into Walton and Felixstowe used by many residents living in the Trimleys in order to avoid the Howlett Way sliproad onto the A14 with heavy lorries to the docks bearing down on local vehicles. There should be a transport assessment carried out on the implications for the High Road - particularly at peak times of the day.

FPAP 3.50 Site opposite the Hand in Hand pub in Trimley St Martin I would endorse the need for a transport assessment here too as 'access to this site must be onto High Road as this provides the most suitable access point for the development and would also require a transport assessment to be undertaken as part of any future application. In addition, there is 'the major negative environmental effect is due to loss of Grade 2 agricultural soils.' I should be interested to know what 'Scope exists to mitigate for this effect.'

FPAP Site 451c and 451d With my concerns about the implications of development for traffic congestion and danger for users on the High Road, I am very worried about the proposal for a minimum of 350 houses on this site. The SSAASP mentions only a transport assessment for Howlett Way. There is also the major negative environmental effect from the loss of Grade 2 agricultural soils and again I am unconvinced by the statement 'scope exists to mitigate for this effect'. There should at least by a transport assessment carried out on the implications for the High Road - particularly at peak times of the day.

The Old Poultry Farm - which the site 451c wraps around - is brownfield land and an eyesore. I cannot see anyone particularly wishing to live in houses which are built beside this derelict site.

FPAP Appendix 3

I welcome the decision to discount the sites in Trimley St Martin set out in this Appendix. However, I am very disappointed that sites 920, 928 and 726 have been left for consideration in 'The local plan review' when they so clearly in my view violate national planning policy and the strategy for the countryside as set out in Core Strategy policy SP29.

Summary:

I welcome the statement that proposals for new residential development outside the physical limits boundaries will be strictly controlled in accordance with national planning policy and the strategy for the countryside as set out in Core Strategy policy SP29.

I welcome the statement that extending the boundaries further was considered inappropriate because this may lead to further development in locations which are not well related to the existing settlements, services and facilities and lead to new building encroaching into the countryside.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

C - 6616 - 3643 - Preferred Policy FPP2: Physical Limits Boundaries - None

6616 Comment

Housing Preferred Policy FPP2: Physical Limits Boundaries

Respondent: N/A (Mr D Tonge) [3643] Agent: N/A

Full Text:

I refer to the recently published plan, and in particular, a change to the planning boundary for Kirton and Falkenham as shown in the diagram below.

When Mark Edgerley presented the local plans at Kirton Church Hall on 27 January this year, the blue planning boundary line included the garden land opposite my house. This is currently in mixed use for vehicle parking and maintenance, stabling horses and other domestic and recreational uses. It has been so used since 1983 when I acquired the land from the late John Cobbold.

The land has its own independent electricity and water supplies.

Encouraged by this, and by supportive comments from neighbours, the Parish Council and my local District Councillor, I started making enquiries as to the likelihood of being able to build a starter home for my daughter, her partner and their baby daughter on this land. However, I was then informed by the planning officer at SCDC that the planning boundary had been redrawn to exclude this land, despite approval being given for a smokehouse business to be developed outside the boundary immediately adjacent to my property. I also see on the SCDC planning portal that there have been at least 3 other recent approvals for developments outside the boundary on and around the B&M site at Cockle 9 acres.

In view of this apparent anomaly, I would ask that the precise location of the planning boundary be looked at once again with a view to including the land in question which can clearly be seen (eg on Google Earth) as a natural part of the village, especially with the Smokehouse now immediately adjacent.

Please bear in mind that this land already has vehicle access, is used daily by residents of Stanley Cottage for car parking and maintenance, and has a significant stable building of timber-clad concrete construction on it, together with its own water and electricity services.

Any further development here could be achieved without any damage to the visual amenity aspect of the land, as this is screened from the road by a mature hawthorn hedge maintained by myself, and the existing driveway would be used for access.

In short re-inclusion within the planning boundary would mean:

- * Greater equity with nearby planning decisions
- * A chance for an empathetic development to keep young people in the village
- * No increase in traffic as already used for parking
- * No new vehicular access
- * No negative impact on neighbours
- * Retention of existing screening hedge and woodland to maintain the rural aspect

I would be most grateful if you could look at this matter again.

Summary:

I would ask that the precise location of the Kirton boundary be looked at once again with a view to including the land in question as a natural part of the village, especially with the Smokehouse now immediately adjacent.re-inclusion within the planning boundary would mean:

- * Greater equity with nearby planning decisions
- * A chance for an empathetic development to keep young people in the village
- * No increase in traffic as already used for parking
- * No new vehicular access
- * No negative impact on neighbours
- * Retention of existing screening hedge and woodland to maintain the rural aspect

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Mr D Tonge [3643].pdf

O - 6664 - 3743 - Preferred Policy FPP2: Physical Limits Boundaries - None

6664 Object

Housing Preferred Policy FPP2: Physical Limits Boundaries

Respondent: Mr Peter Ager [3743] Agent: N/A

Full Text: Dear Sir

I was unable to utilise the on line consultation form, hence my comments below:

I have a number of concerns concerning the development at FPP5 (and also the development already approved on the adjacent site to the east side of Ferry Road). I understand that the combined total number of dwellings will be 283 for the two developments.

FPP2 talks about the Physical Limits Boundaries. Apparently Gulpher Road is a "Physical Limits Boundary". It is equally apparent that there is "open season" on prime farm land for housing development. If that is the case then then is clearly an intention, at least long term, for SDDC to permit house building to the west of the FPP5 site and south of Gulper Road, also on prime farm land of course. (As indicated in 3.15 Inside the physical limits boundary, there is a policy presumption that development is acceptable in principle).

FPP5 is for 150 dwellings but that and the adjacent development will total around 283 dwellings and my concern both during the building stage and when completed is the extra traffic that will be generated. Kingsfleet Primary School in Ferry Road creates a real bottleneck for traffic at least three times a day (morning, lunchtime and afternoon).

During the construction phase there will be many movements of heavy vehicles at both sites. Heavy vehicle drivers currently find it virtually impossible to pass between the parked cars on either side of Ferry Road during school pick up and drop off times. The inevitable result will be HGV's using Upperfield Drive as a rat run. This quiet road is totally unsuited for HGV traffic and I would ask what action SCDC proposes to do to prevent such traffic?

On completion of the sites there will be 400-500 additional vehicles using Ferry Road. Many of these will be moving during the times of conjestion caused by Kingsfleet Primary School parents. Again, the inevitable result will be Upperfield Drive being used as a rat run by drivers wishing to avoid the school time conjestion in Ferry Road and I ask again what action SCDC proposes to do to prevent such traffic?

In short, therefore, refering to the Site Allocations and Area Specific Policies, I do not think that FPP5 is an appropriate area for housing development because it uses prime farm land and the council has not given adequate consideration to the impact the development will have on existing residents and local infrastructure during the construction phase and on completion.

Summary:

FPP2 talks about the Physical Limits Boundaries. Apparently Gulpher Road is a "Physical Limits Boundary". It is equally apparent that there is "open season" on prime farm land for housing development. If that is the case then then is clearly an intention, at least long term, for SCDC to permit house building to the west of the FPP5 site and south of Gulper Road, also on prime farm land of course. (As indicated in 3.15 Inside the physical limits boundary, there is a policy presumption that development is acceptable in principle).

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 6779 - 3060 - Preferred Policy FPP2: Physical Limits Boundaries - None

6779 Comment

Housing Preferred Policy FPP2: Physical Limits Boundaries

Respondent: Felixstowe Town Council (Mr Ash Tadjrishi) [3060] Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Preferred Options Consultation

Thank you for the opportunity to respond to the Suffolk Coastal District Council Felixstowe Peninsula Area Action Plan Preferred Options paper. The Town Council considered this matter at its meeting of 11 November 2015.

Felixstowe Town Council was pleased to welcome and endorse the Felixstowe Peninsula Area Action Plan Preferred Options, subject to the following comments:

Page 13, Para. 2.02

We recommend adding the following to the end of the final sentence of this paragraph: ", as required by the July 2013 Local Plan."

Page 24, FPP3

Remove "(for residents and visitors)" from the bottom bullet relating to appropriate parking provision.

Page 26, Para. 3.30

This paragraph has been reduced in scope from an earlier draft and no longer references the unique location this site holds as a gateway to Felixstowe. It is vital that the policy ensures that any proposals for development of this site include appropriate consideration for this gateway and the statement this makes to those arriving to Felixstowe by road.

Page 27, FPP4

Remove "and Candlet Road" from the first bullet point. Any business units for this site should be restricted to the land adjacent to the A14 Dock Spur only.

Page 27, Title of 3.39

The title should read "Land" rather than "Lane" and include Swallow Close.

Page 29, FPP5

Please include Swallow Close and refer to this site as the "Land north of Conway Close and Swallow Close" throughout.

Page 49, Para. 5.06

Given the latest available information on these sites, this paragraph should be removed.

Page 50, Inset Map

The secondary shopping frontage should continue along Bent Hill on both sides of the road. It should also include the frontage of Trinity Methodist Church on Hamilton Road for consistency. Likewise the primary shopping area shaded in green should include this same section.

Page 51, Para. 5.10

Sentence should end "other than town centre uses".

Page 51, Para. 5.12

Please amend the final two sentences to read as follows:

"The scheme was not completed between Orwell Road and Bent Hill and the AAP will seek to encourage the continuation of the Shared Space along Hamilton Road. The completion of this scheme within the town centre boundary will provide a continuous link between Hamilton Road and Bent Hill and reinforce the connections between the town centre and the sea front."

Page 54, FPP15

Please amend the first paragraph to read "Any change of use proposals in this area should seek to retain a high proportion of retail activity."

Page 68, FPP21

Correction: "The provision of beach huts will be limited to those which currently exist. Any increased provision will be directed towards other parts of the sea front (namely Felixstowe Ferry Golf Club to Cobbolds Point Preferred Policy FPP19) as appropriate."

Page 74, FPP24

The policy should open with the following opening sentence:

"The need to strengthen Felixstowe as a seaside destination is recognised."

The next sentence should read: "Holiday accommodation will be encouraged and supported"

Page 82, FP27

This should be titled FPP27 rather than FP27.

C - 6779 - 3060 - Preferred Policy FPP2: Physical Limits Boundaries - None

6779 Comment

Housing

Preferred Policy FPP2: Physical Limits Boundaries

Please revise the first line of text to read "Spa Gardens and Town Hall Gardens".

Appendix 7:Felixstowe, Trimley St. Mary & Trimley St. Martin Inset Map.
The Physical Limits boundary in regard to the seaward boundary should be drawn as in the 2001 Local Plan map - i.e disappear in to the sea rather than be drawn along the low water mark.

The dotted blue line denoting Proposed Tourism Areas is misleading and these areas should be marked out to define the landward extent and total area covered by those corresponding policies. Landguard peninsula should also be encapsulated whereas the line appears to end at Landguard point. As above, the lines between the areas should simply stop at the sea. The extensions of those lines into the sea can be wrongly interpreted as representing a policy as applying to an element of the sea.

The port area should be included within the Physical Limits boundary as is the case in the 2001 Local Plan map. The Physical Limits boundary in the Manor End area should include the caravan parks and Custom House, terminating at the boundary of Landguard Common.

The colouring of some of the designations on the main map are confusingly similar, notably those for the Proposed District Centre, the District Centre boundary and the revised Physical Limits boundary. Also, the use of very heavy lines at the scale of the main map is unhelpful.

Notwithstanding these observations, thank you for the opportunity to have been consulted. The Town Council looks forward to receiving information on the further development of the Area Action Plan.

Summary:

The port area should be included within the Physical Limits boundary as is the case in the 2001 Local Plan map. The Physical Limits boundary in the Manor End area should include the caravan parks and Custom House, terminating at the boundary of Landguard Common.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

AAP Preferred Options Consultation Response.pdf

C - 6922 - 166 - Preferred Policy FPP2: Physical Limits Boundaries - None

6922 Comment

Housing Preferred Policy FPP2: Physical Limits Boundaries

Respondent: Mrs Carol Florey [166] Agent: N/A

Full Text: I support Candlet Road being the physical limit boundary as it preserves grade 1/2 farmland, AONB and Felixstowe

countryside North of the road. As such I support the fill in policy within the boundary BUT ONLY IF APPLICATIONS

OUTSIDE OF IT ARE METICULOUSLY TURNED DOWN

Summary: I support Candlet Road being the physical limit boundary as it preserves grade 1/2 farmland, AONB and Felixstowe

countryside North of the road. As such I support the fill in policy within the boundary BUT ONLY IF APPLICATIONS

OUTSIDE OF IT ARE METICULOUSLY TURNED DOWN

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7316 - 2605 - Preferred Policy FPP2: Physical Limits Boundaries - None

7316 Comment

Housing Preferred Policy FPP2: Physical Limits Boundaries

Respondent: Suffolk Wildlife Trust (Mr James Meyer) [2605] Agent: N/A

Full Text:

RE: Suffolk Coastal DC Site Allocations and Area Specific Policies Local Plan

Document Preferred Options Consultation and Felixstowe Area Action Plan Preferred Options Consultation

Thank you for consulting us on the above documents. We have the following comments on the sites identified for allocation (or otherwise) presented in the map booklets and on the settlement boundary changes proposed. These comments are based on a desktop assessment of the sites in relation to the presence of areas designated for their nature conservation value, we have not screened these sites for the potential presence of protected species or the potential presence of Priority species or habitats. It is possible that sites included for allocation could support protected species and/or Priority species or habitats and we recommend that this is investigated in detail as the development plan process progresses.

Site Allocations Preferred Options Document

A number of sites proposed for allocation appear to incorporate areas of semi-natural habitat, for example sites at Westerfield and Witnesham (Chapel). Such sites should not be allocated until their biodiversity value has been established. In addition, policies for all site allocations should ensure that all development delivers ecological gain in accordance with the requirements of the National Planning Policy Framework (NPPF) (section 110).

The document also includes a number of settlement boundary amendments. Whilst we support the redrawing of boundaries to tighten them around existing development, there are a number of settlements where the boundary has been extended to take in new areas for development. Of particular concern are extensions at Bawdsey and Rushmere St Andrew where ecological surveys accompanying recent planning applications have demonstrated that the areas have existing biodiversity value. This evidence should be taken in to account

through the Local Plan process and settlement boundaries should not be amended to take in areas which are of existing biodiversity value.

It is also noted that a settlement boundary is proposed around existing development to the south of Hollesley (Alderton Road/Bushy Lane) which does not currently lie within such a boundary. Designation of such a boundary area would potentially allow further development which may result in an adverse ecological impact. The plan should not allow for development which is likely to result in such impacts.

All site allocation policies should also seek ecological enhancements as part of any new development.

Felixstowe Area Action Plan (AAP) Preferred Options Document

A number of the policies in the draft AAP have negative scores for the biodiversity

Sustainability Appraisal indicator (indicator 17). It is unclear how this will be addressed and a plan should not be put forward which results in an overall negative impact on biodiversity, as such this would not be in conformity with the NPPF. For example policy FPP2 scores negatively on the environmental Sustainability Appraisal criteria and it is unclear how allocation of this site would address this. Paragraph 110 of the NPPF requires that plans should aim to minimise adverse effects on the local and natural environment and should allocate land with the least environmental value.

It is also noted that the draft AAP proposes the allocation of sites in Walton; Trimley St Mary and Trimley St Martin. A number of these sites have previously had ecological surveys carried out on them as part of planning applications which has identified that they have biodiversity value. It is unclear how the policies which are proposed to allocate these sites address this issue. It is also unclear whether the cumulative impact of developing all the proposed sites has been assessed. In accordance with the NPPF (paragraph 110) only land with the least environmental value should be allocated.

A number of the policies in the draft AAP include the following text:

"Suffolk Wildlife Trust have identified that the site is within a Suffolk Wildlife Trust consultation area and any future development on this site will need to ensure that issues can be resolved or mitigated through appropriate design". We do not set 'consultation areas' and are unclear where this concept has come from. We therefore request that reference to this is removed from the AAP. It should also be ensured that where sites are to be allocated, the LPA are certain that "issues can be resolved or mitigated through appropriate design". Where there is uncertainty that biodiversity impacts can be mitigated the site should not be allocated, in accordance with the requirements of the NPPF. The AAP should also seek ecological enhancements as part of any new development.

Green Infrastructure

New development brings increased demand for green space, the evidence for green infrastructure planning in the district is currently underpinned by the Haven Gateway Green Infrastructure Strategy (The Landscape Partnership, 2008) and a Green Infrastructure Strategy (The Landscape Partnership, 2011) for the area within the district outside of the Haven Gateway Area. The site allocations process should be used as a mechanism for the implementation of such strategies. As both of these documents are a number of years old we recommend that as part of the development plan process they are updated and that a single plan is produced to cover the whole district. Such a plan should also take account of green infrastructure in neighbouring districts and boroughs in order to produce a plan at a strategic scale.

Habitats Regulations Assessment (HRA)

The Habitats Regulations Assessment (HRA) of the Site Allocations Preferred Options identifies further work that is required to assess the impacts of several parts of the plan on sites of European nature conservation importance. Such assessment should be undertaken prior to the council's Preferred Options being progressed in order to determine whether they are likely to result in significant adverse effects on such nature conservation sites.

The HRA report discounts potential impacts from a number of the proposed sites as they are perceived to be outside of

C - 7316 - 2605 - Preferred Policy FPP2: Physical Limits Boundaries - None

7316 Comment

Housing

Preferred Policy FPP2: Physical Limits Boundaries

walking distance from a European designated site. However, the study does not appear to take account of travel by car from new developments to European designated sites. Prior to the allocation of any new development sites this factor must be addressed to ensure that development of allocated sites, both alone and in-combination, is not likely to result in adverse impacts on any European designated sites. Unless this matter is

adequately addressed we do not consider that the plan can be demonstrated to be 'sound'.

The HRA of the Council's adopted Core Strategy DPD also identified a number of measures which were required in order to prevent increased recreational pressure from resulting in a likely significant effect on sites of European nature conservation importance. It should therefore be ensured that these measures are incorporated in to the Site Allocations and Felixstowe AAP documents, with the impacts of the proposals within these documents then assessed accordingly. If you require any further information or wish to discuss any of the points raised above please do not hesitate to contact use

Summary:

FPP2 scores negatively on the environmental Sustainability Appraisal criteria and it is unclear how allocation of this site would address this. Paragraph 110 of the NPPF requires that plans should aim to minimise adverse effects on the local and natural environment and should allocate land with the least environmental value.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Suffolk Coastal Site Allocations Preferred Options.pdf

O - 6744 - 3785 - 3.21 - None

6744 Object

Housing 3.21

Respondent: Stephen Wyatt [3785] Agent: N/A

Full Text: I object to the use of this site on the grounds that this is a flood plain and it is not necessary to build residential

accommodation here. Also, the loss of temporary parking space will cause additional burdens on residents, particularly

in the summer, by adding to the number of cars and reducing the parking capacity.

Summary: I object to the use of this site on the grounds that this is a flood plain and it is not necessary to build residential

accommodation here. Also, the loss of temporary parking space will cause additional burdens on residents, particularly

in the summer, by adding to the number of cars and reducing the parking capacity.

Change to Plan Delete this proposal from the plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6720 - 3749 - 3.22 - None

6720 Object

Housing 3.22

Respondent: Mr Robert Whitehouse [3749] Agent: N/A

Full Text: I disagree most strongly that Mannings amusements is a key leisure attraction. In fact, I would go as far as to say that

amusement arcades etc. are very out-dated and are quite probably a strong deterrent to tourism.

Summary: I disagree most strongly that Mannings amusements is a key leisure attraction. In fact, I would go as far as to say that

amusement arcades etc. are very out-dated and are quite probably a strong deterrent to tourism.

Change to Plan Delete;

"which provides a key leisure attraction for Felixstowe"

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6765 - 3060 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

6765 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

Respondent: Felixstowe Town Council (Mr Ash Tadjrishi) [3060] Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Preferred Options Consultation

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Felixstowe Town Council was pleased to welcome and endorse the Felixstowe Peninsula Area Action Plan Preferred Options, subject to the following comments:

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We recommend adding the following to the end of the final sentence of this paragraph: ", as required by the July 2013 Local Plan."

Page 24, FPP3

Remove "(for residents and visitors)" from the bottom bullet relating to appropriate parking provision.

Page 26, Para. 3.30

This paragraph has been reduced in scope from an earlier draft and no longer references the unique location this site holds as a gateway to Felixstowe. It is vital that the policy ensures that any proposals for development of this site include appropriate consideration for this gateway and the statement this makes to those arriving to Felixstowe by road.

Page 27, FPP4

Remove "and Candlet Road" from the first bullet point. Any business units for this site should be restricted to the land adjacent to the A14 Dock Spur only.

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The title should read "Land" rather than "Lane" and include Swallow Close.

Page 29, FPP5

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Sentence should end "other than town centre uses".

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Page 54, FPP15

Please amend the first paragraph to read "Any change of use proposals in this area should seek to retain a high proportion of retail activity."

Page 68, FPP21

Correction: "The provision of beach huts will be limited to those which currently exist. Any increased provision will be directed towards other parts of the sea front (namely Felixstowe Ferry Golf Club to Cobbolds Point Preferred Policy FPP19) as appropriate."

Page 74, FPP24

The policy should open with the following opening sentence:

"The need to strengthen Felixstowe as a seaside destination is recognised."

The next sentence should read: "Holiday accommodation will be encouraged and supported"

Page 82, FP27

This should be titled FPP27 rather than FP27.

C - 6765 - 3060 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

6765 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

Please revise the first line of text to read "Spa Gardens and Town Hall Gardens".

Appendix 7:Felixstowe, Trimley St. Mary & Trimley St. Martin Inset Map.

The Physical Limits boundary in regard to the seaward boundary should be drawn as in the 2001 Local Plan map - i.e disappear in to the sea rather than be drawn along the low water mark.

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The port area should be included within the Physical Limits boundary as is the case in the 2001 Local Plan map. The Physical Limits boundary in the Manor End area should include the caravan parks and Custom House, terminating at the boundary of Landguard Common.

The colouring of some of the designations on the main map are confusingly similar, notably those for the Proposed District Centre, the District Centre boundary and the revised Physical Limits boundary. Also, the use of very heavy lines at the scale of the main map is unhelpful.

Notwithstanding these observations, thank you for the opportunity to have been consulted. The Town Council looks forward to receiving information on the further development of the Area Action Plan.

Summary:

Page 24, FPP3

Remove "(for residents and visitors)" from the bottom bullet relating to appropriate parking provision.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

AAP Preferred Options Consultation Response.pdf

S - 6897 - 166 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

6897 Support

Housing Preferred Policy FPP3: Land at Sea Road, Felixstowe

Respondent: Mrs Carol Florey [166] Agent: N/A

Full Text: However, relocation of the market is essential not just desirable. As you state it is a crucial tourist attraction.

The suggested parking for residential areas is also essential.

Summary: However, relocation of the market is essential not just desirable. As you state it is a crucial tourist attraction.

The suggested parking for residential areas is also essential.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

S - 7121 - 3898 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7121 Support

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

Respondent: Sharon lannuzzi [3898] Agent: N/A

Full Text:

I am writing in response to the invitation for local people to give their opinions on the proposed plans for the peninsular.

70 houses on land opposite the Hand in Hand - not in favour

The Hand in Hand is a Grade 2 listed building as is the cottage adjacent to the right hand side of the field. Possibly there are other properties in that area that are also listed. There are already 60 house being built on the Mushroom Farm site so to add an additional number of houses on that scale would create an estate. The Mushroom Farm site will create additional traffic however the roundabout will aid this. To create another entrance further up will create extra traffic and the additional houses would spoil the village feel to the area and spoil the view for houses in that area. The Trimley Sports and Social Club is an excellent social venue for our area. The committee have worked hard on limiting outdoor noise. I would be saddened if new residents complained about noise levels and this venue was forced not to stage events for the local community.

300 houses Howlett Way - Not in favour

As one of the organisers of Trimley carnival, I would not be in favour of that number of houses being located there. Howlett Way is a 'pinch point' when the procession passes. 300 houses would create an awful lot of traffic during rush hours and affect school traffic on the High Road. Our 2 Trimley Schools are running almost at capacity for pupil numbers. Where would these families be schooled? Could The Academy cope with extra numbers? If our Trimley Schools needed expanding, where would the revenue come from? School budgets are currently stretched.

100 houses off Thurmans lane/Thomas Avenue - In favour

Providing the access to these houses is via Faulkeners Way, from Thomas Avenue/The Josselyns, this proposal does make sense. The houses would be built onto an existing estate on land adjacent to the A14. The number of houses may need to be reviewed to ensure they do not impact on houses in Thurmans Lane/Church Lane.

Sunday Market Site - in favour

Unfortunately the Sunday market has fallen into decline in recent years and the current number of stalls can be easily managed on the Mannings site. Therefore it makes sense to build on this piece of land to improve the visual impact of this piece of land and tie in with the nearby regeneration of Martello Park.

With regard the proposal for houses in Walton near the Academy, I feel I would need more information before making a decision.

I look forward to hearing about future developments with these proposals.

Summary:

Unfortunately the Sunday market has fallen into decline in recent years and the current number of stalls can be easily managed on the Mannings site. Therefore it makes sense to build on this piece of land to improve the visual impact of this piece of land and tie in with the nearby regeneration of Martello Park.

Change to Plan N/A

Appear at exam?

Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

C - 7262 - 3934 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7262 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

Respondent: Mr & Mrs Williams [3934] Agent: N/A

Full Text: Preferred (

Preferred Options Public Consultation Response form

- *□Do you think that the Council has selected the most appropriate preferred options?
- * Are the policy requirements justified and do they meet the needs of the local community?
- * Can you suggest a more suitable approach than that outlined?
- * Are there any other alternative options that need to be considered?
- * Do you agree with the findings of the sustainability appraisal assessments undertaken?
- * Do you have any other comments on the preferred options documents?

Please indicate to which document your comments relate to?

Felixstowe Peninsula Area Action Plan

Your comments

*Do you think that the Council has selected the most appropriate preferred options? In short, sorry, but No...

Although one or two small scale sites within the town and Thurman's lane (ref 383f &451f)would seem to be logical extensions of existing past development which, with suitable precautions discussed later, could be seen as acceptable use of land, the three preferred options for the Trimley villages and Walton will fundamentally change their characters.

There are several views, (Vistas if you like) clearly seen as you walk or drive around the area, that positively `define` the demarcation of these three distinct communities.

These demarcation, `vistas, ` can be seen, from the high road, the A14, or both.

If the preferred options, shown are used, then these demarcations and vistas will be lost forever, and a homogenised sprawl, from the sea, to the very edge of the Trimley's will be inevitable.

With further likely expansion taking place during the next stage (2027) there is a high probability that any remaining gaps will be `filled in,` as the precedent will have then been established.

I have indicated these vital sightlines on the modified map at the end, along with possible alternative and equivalent sites I refer to the preferred options (PO)

- 1) for land off Howlett way ref 451c &451d
- 2) land North of High Street, Walton ref 451g
- 3) land opposite Hand in Hand public house ref 451b
- 4) land North of Conway close ref 502e

1)

the SE view from Howlett way looking towards Felixstowe, across agricultural land gives a clear separation, from the substantially developed estates on the other side of this road, looking NW.

This is further reinforced by the view SW across to the Orwell, Albeit, at this stage, outside the red boundaries but in 2027, that too, could change?

The ongoing `Mushroom farm` development, has happily not significantly spoiled this perception of open countryside. This PO area, surrounded by footpaths, is extensively used by local residents of both communities, for horse riding, dog walking, and rambling, precisely` because`, the area, is, undeveloped.

Substantial bird and wildlife thrives within the area and is a valued resource for enjoyment.

A similar area could be produced, if the boundaries were extended north, to the other side of the A14 (shown on modified map - see attached document) that would prevent coalescence along the high road and reduce traffic impact, along the high road substantially, as easy access to A14 is possible.

2) Land North of High Street, Walton ref 451g

The wide demarcation of Walton and Trimley St Mary, is clearly seen and felt, when looking north from the high road, but hardly noticeable (due to banking), when looking South from the A14/A15d.

If this PO is used, Walton will simply merge into one with Trimley St Mary..... Especially as it is opposite an existing, approved planning application for a large development, the result ... Horrible!

However along the N boundary a smaller `strip` development could, with good tree screening, and substantial setback, still not affect this natural gap too profoundly, giving say 200 -300 homes?

Again the land north, on the other side of the A14 would give a similar area and have easy access onto the roundabout, still leaving good vistas from the road as shown on my modified map [see attached document].

3) Land opposite Hand in Hand public house ref 451b

The spectacular views, looking South across the country side from the` Hand in hand` area, will be destroyed even if only a single frontage was permitted, and of more concern `allow` an entirely feasible, further expansion to the railway in 2027, once the excursion across the high road is established.

Although fortunately in this case, it would not 'link' two separate communities, just extend one.

However, if the area NE, and opposite Goslings farm were to be used, a similar area with good access would be available, without extending the extent of the village inordinately?

4) Land North of Conway close ref 502e

The other preferred option north of Conway close, looks innocent enough, until again, it is realised that adjacent land to the East, has already been granted planning permission, so the `white` area is somewhat misleading, as that

C - 7262 - 3934 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7262 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

development has already removed the view for the existing residents.

But it use would not appear to coalesce any discreet areas, as 1) and 2) do, so like 3) is mainly the expansion of an existing community.

The two `orange` areas of no permitted development, are certainly needed.(and appreciated)

Of concern however, is once the preferred options are established, it takes no great stretch of imagination to surmise that these two areas of `no development` will be the next to be `filled in` when the AAP is reassessed in 2027.

If that were to take place, any pretext of individual villages and communities would then be farcical.

If alternative options could be chosen, either as suggested or elsewhere by yourselves, it would be far less likely that everything could be amalgamated later.

- * Are the policy requirements justified and do they meet the needs of the local community?
- * Can you suggest a more suitable approach than that outlined?
- * Are there any other alternative options that need to be considered?
- * Do you agree with the findings of the sustainability appraisal assessments undertaken?
- * Do you have any other comments on the preferred options documents?

The other questions posed above require, I feel, a slightly different approach and response.

I have read through countless documents, counter arguments and counter proposals, about the need for this many homes, employment, infrastructure etc, from 2009 until 2012 when the basic framework was established by the government/local government.

These discussions were far more eloquently expressed by the S.T.A.G (Save Trimley Against Growth) and N.A.N.T. (No Adastral New Town) representations, than I could possibly achieve, and yet failed to modify the `official` stance.

Therefore I feel the above battles have been fought and lost long ago, and now we are at the `Damage limitation` stage of the proceedings, although hopefully this will nonetheless be productive.

Similarly the sustainability assessments, apart from being largely unfathomable, use criteria that will always be subjective, and can be `adjusted` to suit the needs of the chosen decision.

These 'battles' have likewise, been argued over and lost long ago.

Finally, It would be naive, not to perceive the hand of Trinity College in all of this, especially since their `Vision` of `their` land was published a few years back, and their `influence` when attempting to realise the maximum return for the land, with no real empathy for everyone affected.

This at least leaves us with at least the possibility of 'tinkering' with the preferred options, using yourselves, as our 'voice' and 'buffer' to make these decisions slightly more 'palatable' to all of us who 'will' be affected.

Therefore my next section will be on those preferred options but here is my take on the areas which may affect less people, but the land may not be that (cynically) chosen by Trinity College.......

[see attached document]

Site Allocations and Area Specific Policies

* Do you have any other comments on the preferred options documents?

As mentioned under my comments on the Felixstowe Peninsula Area Action Plan, I am assuming those options, will now likely go ahead regardless, and we are in a sort of 'damage limitation' stage?

The preferred options for land off Howlett way ref 451c &451d

I know well the cliché "Not in my backyard" but in this instance it `IS` very much in our backyard, and obviously we/all, the existing tenants who are affected, have a vested interest, especially as we have `in` vested` considerable money and time to live here, and for all the qualities of life, it provides.

Equally, for all my working life, my career was in the building industry, including design and planning, before finally teaching it to HNC level. Therefore I do know, that a well thought out development, can work, and work well, and executed sensitively, need not unduly destroy an area.

So what were the reasons we chose to live here, and what features need to be protected, so that many more can share and enjoy this resource, should they soon live here, with ourselves...?

Well the area where we live has some wonderful and surprising features, which make it, just what it is... Simply put, it is pure Countryside.....

Entering from the high road, and within barely 10m of walking down Thurmans, or Church lane, you immediately disappear into an archetypical `English` setting, unspoilt in a hundred years as evidenced by photos. Leaves and mud on the road greet you as you walk down. The bustle and noise fade rapidly away, and then you emerge into a 100 acre field where fox and rabbits play.

A rich variety of birds sing in the foliage and crops. You give a greeting to a horse and rider, then a walker, for there are many.. Traffic although near, sounds distant, and fails to spoil the setting.., you can enjoy the big skies, with its sunrises and sunsets, or If you chose `Dark` starry nights, with owls, and fox's cries, and distant lights through the rustling trees......,

C - 7262 - 3934 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7262 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

All this, within the boundaries, of three busy roads. A true haven of peace within....

Any future development should endeavour to preserve all of this, especially for the existing tenants, and by incorporating such features, it would surely benefit any new dwellers life too, even if only at its peripheries, for then, they too, could walk with ease into this time warp or jet off down the A14 to town as is their choice, as we do.

There are also two, one hundred year old oaks in the centre that do not appear to have TPOs on them, but would surely be an asset within an open area for the development?

Likewise, a 1940s WW2 `pillbox` remains that should be preserved for posterity, and could easily become a feature within a development, either as a viewing platform (it has steps to a walled roof as it was also an anti aircraft position) or like the control tower at Martlesham Heath, a heritage site with information displays and focus of a park area.

My modified map [see attached document] shows some ideas that could help achieve this, but the simple principals are, to shield old from new, by leaving a broad band of untouched land (say 15m) around the boundaries with a screening of trees, that would preserve countryside views from both sides, and leave all the above, for all to enjoy.... Oh, And soft street lighting PLEASE, for preserving the dark night skies...Most planners, forget that, important feature of the `countryside`

It is paramount (and very much appreciated) that both Church lane, and Thurman's lane, are to be classified as `protected` lanes, and not to be used for access, to any new developments.

These peaceful routes provide part of that countryside experience. Please, cast this decision irrevocably in Stone. Any increase in (vehicle) traffic would destroy them.... Walkers and cyclists welcome...

The orange area to be protected from any developments is also vital to preserving this encircled haven of our countryside, so easily accessible from both Trimley villages.

It will also maintain that important historical separation of them.

Finally, the protected area should, provide an alternative home for the displaced, birds and wildlife, especially if several dead trees are replaced and give that haven of tranquillity for them within, for all of us to enjoy.

Thank you for protecting it, But again, please cast it in stone for all perpetuity, as it is only too easy to `fill it in later`, with the loss of all of the above.

[see atached document for revised maps of following:]

Land off Howlett way ref 451c &451d Land south of Thurmans Lane Ref 383f & 451f

This development, like Howlett way above, will affect existing tenants on three side. But with similar peripheral treatment of screening trees and scrub type band, will again separate both new and old from both directions.

Not allowing Thurmans lane to be used for access will preserve the `haven` of timeless countryside within the orange protected zone for both communities and indeed forms a circular route for both Trimley's

Land North of High Street, Walton Ref 451g

This area provides a clear division between Walton and Trimley St Mary, when looking North from the high road, but barely visible from the A14 /A15b

As this must also be taken in conjunction with the approved development opposite behind Walton hall, it would seem imperative to keep any development screened from the high road.

The old stables and Dutch house, will help this illusion, but need to be extended along the entire High Road frontage, with a decent `set back` to a solid new tree line.

And now to another `vested interest....

The need to have the rifle club relocated before any development can continue (Para 3.27)

Could easily be made redundant, if the club could remain where it is. The club has no desire to move.

It would also provide the buffer mentioned in Para 3.29 and is a natural visual break along with the old stables for demarcation of the areas

Any possible noise issues could be solved with banking and/or trees as with the accepted C13/0967 planning application for elsewhere

For the developer, the small loss of building land would be offset by the ability to start work forthwith. The club has a strong affiliation with Mencap, RNIB and national sports bodies, a real asset to the local populace, that could easily disappear if evicted, as we are never likely to raise enough money to do so..

[see atached document for revised map of following:]

Land North of High Street, Walton Ref 451g

Sunday market site sea Rd ref 1011c

C - 7262 - 3934 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7262 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

Although not part of the argument for preserving historic `vistas` (indeed it was once a building)

the choice to develop the Sunday market will deprive the town of one of its significant venues, for tourism, and used by hundreds of local and outside visitors.

The surrounding retailers will undoubtedly lose a significant amount of passing trade and helps keep this area `alive` and clearly part of the tourism area (Para 6.22)

I can find no mention of a similar, alternative site.

[see atached document for photographs of following:]

Havens of peace within Land off Howlett way ref 451c &451d Looking due south from drain and the old Rectory Northern boundary Possible viewing point on 1940s pillbox and the old oaks looking North

End of Church lane looking North..wildlife & tranquillity reign within three busy roads

NB unploughed borders are the suggested 15mtr `No man's land Buffer zones

Summary: Although not part of the argument for preserving historic `vistas` (indeed it was once a building)

the choice to develop the Sunday market will deprive the town of one of its significant venues, for tourism, and used by

hundreds of local and outside visitors.

The surrounding retailers will undoubtedly lose a significant amount of passing trade and helps keep this area 'alive'

and clearly part of the tourism area (Para 6.22) I can find no mention of a similar, alternative site.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Preferred Options Public Consultation Response form.pdf

C - 7307 - 3949 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7307 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

Respondent: Pigeon Investment Management Ltd [3949] Agent: Strutt & Parker (Mr Richard Clews) [3945]

Full Text:

1 INTRODUCTION

- 1.1 This representation has been prepared by Strutt Parker LLP on behalf of Pigeon Investment Management Ltd in respect of land at Trimley St Martin, Alternative Option Site 3022a in response to the six week public consultation (19th October 2015 to 30th November 2015) on the Felixstowe Peninsular Area Action Plan, Preferred Options Document, hereafter referred to as the Felixstowe Peninsular AAP. It should be read in conjunction with the following documents copies of which are contained within the appendices and summarised in the delivery statement section of this consultation response below:
- * Site Plan;
- * Indicative Layout Plan;
- * Preliminary Drainage Appraisal October 2015;
- * Desk-based Archaeological Assessment;
- * Landscape and Visual Assessment;
- * Preliminary Ecological Appraisal; and
- * Transport Report
- * Phase 1 Contamination Report

2 EXECUTIVE SUMMARY

- 2.1 As set out in these representations there are some fundamental concerns regarding the soundness of the Felixstowe Peninsular AAP and the Area Specific Policies Development Plan Document (DPD). These relate specifically to the approach adopted and the plan's failure to allocate suitable sustainable sites to address the issues arising from the failure to clearly identify up to date objectively assessed housing need for the District. There appears to be a conflict with Policy SP2 of the Core Strategy (2013) and the requirements of the National Planning Policy Framework(NPPF).
- 2.2 In respect of the Felixstowe Peninsular AAP, at a site specific level, the concern is that the plan fails to take the opportunity to allocate additional land at Trimley St Martin in accordance with the development strategy set out in the adopted Core Strategy. The site in question, Alternative Option Site 3022a, was identified as suitable in the SHLAA 2014.

It is sustainable, available and deliverable. It would represent a logical extension to the physical development limits of the village. In accordance with the presumption in favour of sustainable development and the need to boost significantly the supply of housing it is contended that it should be included as a Preferred Allocation.

3 POLICY BACKGROUND

- 3.1 The Site Allocations and Area Specific Policies Development Plan Document Preferred Options Consultation Document, October 2015 has been published for public consultation along with the Felixstowe Peninsular AAP. These two documents seek to provide the policies and allocations necessary to implement the strategic policies set out in the Suffolk Coastal District Local Plan Core Strategy and Development Management Policies, July 2013 document. Together the Core Strategy, Site Allocations and Area Specific Policies Document and the Felixstowe Peninsula AAP will form the Development Plan for Suffolk Coastal District Council.
- 3.2 While this representation relates to the Felixstowe Peninsular AAP preferred options document and more specifically proposed allocations in the village of Trimley St Martin, it also has to be considered in the wider context of the planning policy framework for the whole of the District.

4 NATIONAL PLANNING POLICY FRAMEWORK

- 4.1 Paragraph 14 sets out that "a presumption in favour of sustainable development" is at the heart of the Framework and describes this as "a golden thread running through both plan-making and decision taking." It goes on to state that for plan- making this means:
- * "Local planning authorities should positively seek opportunities to meet the development needs of their area;
- * Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change..."

These requirements are repeated in more detail throughout the Framework. Paragraph 15 requires the presumption in favour of sustainable development to be applied to local plan policies so that development which is sustainable can be approved without delay.

- 4.2 The Core Planning Principles set out at paragraph 17 include a set of overarching objectives which should underpin plan making. Of particular relevance to this consultation response are that planning should be:
- * plan-led with up to date plans providing a practical framework for predictable and efficient decisions.
- * Not be about scrutiny but be a creative exercise.
- * Proactively drive sustainable development to deliver the homes the country needs.
- 4.3 Every effort should be taken to objectively identify and meet the needs of the area. Sufficient land suitable for development having regard to market signals should be
- 4.4 Paragraph 47 sets out a clear challenge to local planning authorities "to boost

significantly the supply of housing..." In order to achieve this they should ensure

that their Local Plan meets the full objectively assessed needs for the area and they should identify and annually update their five year housing supply.

4.5 For plan-making paragraph 151 advises that Local Plans should be consistent with the policies and principles of the Framework, "...including the presumption in favour of sustainable development."

C - 7307 - 3949 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7307 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

- 4.6 Paragraph 154 requires Local Plans to be "...aspirational but realistic" and paragraph 159 reminds local planning authorities that they "...should have a clear understanding of housing needs in their area."
- 4.7 Finally, for a local plan to be found sound at examination by an independent inspector the Framework at paragraph 182 advises that it should satisfy the following tests, namely that it is:
- * "Positively prepared the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- * Justified the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- * Effective the plan should be deliverable over its period and based on effective joint working on cross- boundary strategic priorities; and
- * Consistent with national policy the plan should enable the delivery of sustainable development in accordance with the policies in the Framework."
- 4.8 For the purposes of this consultation it is necessary to consider whether the Felixstowe Peninsular AAP satisfies the above objectives.

5 APPROACH TO HOUSING GROWTH

Core Strategy

5.1 At the strategic level housing numbers and distribution are set out in the Core Strategy.

Objective 2 states:

"To meet the minimum locally identified housing needs of the district for the period 2010 to 2027, taking into account existing and future economic,

environmental and social opportunities and constraints'

In respect of this objective there are two important points to note. Firstly, that the Core Strategy seeks to meet the minimum locally identified housing need, and secondly, that it is a locally identified housing need for the plan period. 5.2 However, it is considered given the acknowledged short fall that the DPD and AAP should be based on the NPPF principles set out above including; to be aspirational; provide flexibility; positively seek to meet identified needs; and most importantly, to significantly boost housing supply. It is therefore considered that the Felixstowe Peninsular AAP should be setting its own, up to date and ambitious objectives.

- 5.3 Core Strategy policy SP2 sets out housing numbers and distribution. However, policy SP2 notes that provision will be made for at least 7,900 new homes, distributed in accordance with the settlement hierarchy set out in policy SP19. The policy then goes on to commit to an early review in order to identify the full objectively assessed housing needs for the District, to ensure this is met in so far as this is consistent with the policies of the NPPF.
- 5.4 The Inspector's report in respect of the Core Strategy Examination (June 2013) made it clear that an early review was essential as at the time the Council had identified an objectively assessed need of 11,000 dwellings. At paragraph 46 of the Inspector's Report he commented:

"Even if the theoretical capacity of all the sites included in the Strategic Housing Land Availability assessment (SHLAA), existing commitments potential brownfield opportunities, allocations carried forward from the previous Local Plan and a windfall allowance were taken into account, the provision would fall some way short of the 11,000 dwellings required."

5.5 At this point, the Inspector clearly gave consideration to suspending the Examination. However, he concluded that as none of the adjoining Councils had objected to the scale of housing proposed, that having a core strategy in place with an early review would be preferable to the alternative of suspension of the examination and the likely withdrawal of the plan.

5.6 While it is noted that the Site Allocations and Area Specific DPD Issues and Options consultation commenced in 2015, it is of significant concern that this occurred ahead of the objectively assessed housing needs for the District being reviewed, updated and firmly established. Policy CS2 states:

"An early review of the Core Strategy will be undertaken, commencing with the publication of an Issues and Options Report by 2015 at the latest. The review will identify the full, objectively assessed need for the District and proposals to ensure that this is met in so far as this is consistent with the policies in the National Planning Policy Framework."

5.7 On the basis of the currently available information the Felixstowe Peninsular AAP and the DPD are inconsistent with this adopted policy, and paragraph 158 of the NPPF which requires that the Local Plan is "...based on adequate, up-to-date and relevant evidence..."

5.8 Table 3.1 of the Core Strategy references the need for an extra 11,000 dwellings as identified in the work commission by Oxford Economics (OE) in 2010. It goes on to suggest that the review should identify land to meet the current acknowledged shortfall between the locally assessed requirement and the OE objectively assessed need (OAN). However, the District still does not appear to have a published understanding of its current OAN. The OE figure of 11,000 dwellings is very old and predates the NPPF. As advised in Planning Practice Guidance regarding housing need assessments, the household projections published by the Department for Communities and Local Government provide the starting point estimate of overall housing need (ID: 2a-015-20140306). The DCLG estimate may require adjustment to reflect factors affecting local demography and household formation rates. However, the Sub National Household Projections (2015) suggest a growth of 8,362 for the period 2010 to 2027 and this is not

referenced in the SAASP document or the AAP. This indicates that the Core Strategy figure promoted in the SAASP is out of date. While the DCLG figure is lower than the OE figure, it is clear that the Core Strategy proposal to provide 7,900 homes is lower than the most recent projections that the Council should be considering as a starting point for

C - 7307 - 3949 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7307 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

understanding its OAN. On the basis that the 2010 OE figure was 11,000, the reality is that the actual objectively assessed need figure is likely to be higher than 8,362 and that 7,900 would fail to meet the OAN.

5.9 Policy FPP1 of the Felixstowe Peninsular AAP gives the impression that it is still working to the Core Strategy target of 7,900 and does not explain if it is actually working to the OE figure or some other estimate and if so what that actually equates to for the AAP. On this basis there must be a concern that at examination the Felixstowe Peninsular AAP will not be found to comply with the tests set out in paragraph 182 of the NPPF, failing all the tests.

Five Year Housing Supply

5.10 In June 2015 Suffolk Coastal District Council published a Housing Supply Land Assessment. This covers the period 1st April 2016 to 31st March 2021 and identifies the current position with regard to identifying a five year +5% supply of housing land which it assess as 5.12 years.

5.11 Paragraph 3 acknowledges the supply in 2014 was 4.3 years this is a figure which has been borne out in appeal decisions as recently as September 2015

(APPJ3530/A/14/2225141). Fundamentally, the current assessment is still based on the Core Strategy target of 7,900. As set out above, this is an acknowledged under estimate of the actual objectively assessed need, which in the absence of anything more up to date, on the best available evidence suggests a target in the region of 11,000 dwellings. 5.12 In addition, it is also observed that the projections contained in table 3 still appear to rely on the early unconfirmed delivery of some large developments with outline permission which are still subject to S106 agreements. Taking these factors into consideration the five year supply with a modest surplus of 0.12 years, must reasonably be considered vulnerable to challenge at this time. If the 11,000 dwelling figure or even the lesser DCLG Household projection of 8,362 are applied then a five year supply in all probability does not actually exist and is at best 4.75 years.

5.13 Again, this point suggests that the Felixstowe Peninsular AAP will struggle to

demonstrate compliance with paragraph 182 of the NPPF at examination and reinforces the need to allocate additional land within the AAP.

Felixstowe Peninsular AAP

5.14 The overall spatial strategy set out in the Core Strategy (see policy SP2) provides for development to be focused in the Eastern Ipswich Plan Area, at Felixstowe and the Trimley Villages and shared between the market towns. Policy SP19 identifies that Felixstowe, Walton and the Trimley Villages will accommodate a proposed housing growth of 22%. Furthermore the Strategic Housing Land Availability Assessment (March 2014) acknowledges:

"The core Strategy expects the Market Towns and the Felixstowe and the

Trimleys area to accommodate a considerable proportion of the growth identified for the district to 2027".

5.15 The Felixstowe Peninsula AAP in policy FPP1 identifies a minimum requirement for a further 807 units before 2027 as necessary to meet the Core Strategy requirement. However, as previously mentioned above these figures are a minimum and the AAP should be seeking to maximise delivery in sustainable locations in order to boost significantly the supply of housing as required by the NPPF. It is therefore contended as set out in more detail above, that policy FPP1 should be setting a more ambitious target, and in the absence of any more recent objectively assessed need, looking to a District target of 11,000 dwellings rather than the 7,900 derived from the Core Strategy. Policy FPP1 should therefore be reworded to identify a higher overall target and as such an appropriate apportionment, for Felixstowe Peninsular. 5.16 It must be acknowledged that the AAP states at paragraph 3.13:

"The Felixstowe Peninsula AAP identifies over 1,100 units on the preferred sites outlined in this document. The Council consider it necessary to over allocate sites across the district to ensure that a five year land supply is maintained which is paramount. Over allocating also provides a range of sites, sizes and locations for development to allow a choice of location for those looking for a residential property. It also takes into account that the population is growing and that the Council's objectively assessed housing need is likely to increase in the future.

The delivery of sites will be monitored throughout the plan period to consider how the AAP is performing against the Core Strategy targets."

5.17 While this additional provision is welcome, it is still unclear if it will provide sufficient sites, which are available and deliverable, to enable the District to demonstrate a five year housing land supply in the short term. The current five year supply is not based on an up to date objectively assessed need. It is therefore contended, that opportunities should be taken to allocate more sustainable sites that can be delivered in accordance with Core Strategy spatial strategy so that the District can significantly boost its supply of housing as required by the NPPF. These sites should allow for variety in house types and

tenures to come forward to meet local needs and ensure choice and competition in the market for land (NPPF paragraph 47).

5.18 From the statement in paragraph 3.13 the Council appears to be acknowledging that the objectively assessed need is rising and site allocations should reflect this. It would therefore seem logical, and in the interests of good planning, for them to plan to meet this need now, by way of the allocation of further sustainable sites.

Felixstowe Peninsular AAP Preferred Site Allocations

5.19 The Felixstowe Peninsular AAP identifies 7 sites as preferred option allocations. Two of these are in Trimley St Martin and one in Trimley St Mary and are identified on the inset maps in the AAP. A summary of the 7 sites is set out below along with some brief summary observations in italics which are considered relevant to this consultation response: 5.20 Preferred Policy FPP3: Land at Sea Road, Felixstowe

Land is identified at Sea Road, Felixstowe for a mixed use development of commercial /tourism uses and residential dwellings. (Indicative Capacity 40 dwellings)

C - 7307 - 3949 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7307 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

It is noted that this is a mixed use site and residential development will be dependent on

There is also an issue with sewage capacity which may impact on viability. Finally if the market has to be relocated this could also significantly delay delivery.

5.21 Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

Land is identified north of Walton High Street for a mixture of residential units; including on site open space,

comprehensive landscaping and new business units. (Indicative Capacity 400 dwellings)

This site is dependent on the Rifle Club being relocated, requires a master plan to

include a link road which could in turn impact on viability. The policy acknowledges that it is likely to be a longer term opportunity. There are also air quality and sewage capacity issues to be resolved.

5.22 Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Land is identified to the north of Conway Close for a residential development. (Indicative Capacity 150 dwellings) The site could come forward, however, there are still sewage capacity and air quality issues to be addressed and the site is adjoined by heritage assets.

5.23 Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St

Martin Land is identified on Trimley High Road for residential development with on site open space to provide a village green. (Indicative Capacity 70 dwellings)

The site could come forward with access on to the High Street. The Public House is a listed building and therefore development proposals will have to be sensitive to its status which may limit capacity.

5.24 Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

Land is identified at Howlett Way for residential development with on site open space. (Indicative Capacity 360 dwellings)

Access to the site has not been identified in detail other than off Howlett Way. There are air quality issues and concerns regarding the setting of the Old Rectory. In addition there is a water main crossing the site. The site wraps round the Old Poultry Farm and the Old Rectory both of which may delay availability.

5.25 Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

Land is identified south of Thurmans Lane for residential development. (Indicative

Capacity 100 dwellings)

This site could come forward, again it is subject to air quality issues and the need to have regard to Mill Farm a Grade II Listed Building, it will also have to be accessed through the adjoining residential areas.

5.26 Preferred Policy FPP9: Land at Bucklesham Road, Kirton

Land is identified south of Bucklesham Road for residential development. (Indicative Capacity 15 dwellings)

This is a relatively small ribbon development site which could come forward. There are potentially issues to be resolved in respect of local sewage capacity in the village.

Assessment of Preferred Allocations

5.27 If the preferred site allocations indicative capacities are totalled up cumulatively this suggests they could deliver 1,135 dwellings between them. However, as set out above the delivery, and more importantly, the quantum and likely timing of delivery is much less certain. It is noted that the two largest sites, FPP8 and FPP4 do not appear to be very advanced. With this in mind in order to maintain a realistic five year supply it will be important for the District to maintain the delivery of smaller sites which can readily come forward.

6 ALTERNATIVE OPTION SITE 3022A

6.1 The site the subject of this representation, Alternative Option Site 3022a is just such a site and accordingly it is contended that it should be included as a preferred allocation on the basis that it is available and deliverable at the present time. In addition, it does not need to overcome the issues and constraints associated with some of the preferred allocations set out above and as such can contribute to the acknowledged shortfall in housing need, within the first five years of the Plan period. It is also contended that the AAP should be more ambitious in order to meet local housing need and it would be appropriate for the site to be included based on the presumption in favour of sustainable

6.2 When considering the Trimley Villages and the opportunities for further allocations, Trimley St Mary is the larger of the two settlements and any significant further expansion may potentially undermine the sustainability of it as a village. Trimley St Martin being the smaller of the two settlements would appear to have greater capacity to absorb further growth. Trimley St Mary is also constrained by its proximity to Felixstowe, the ANOB designation to the south-west, the A14 to the north-east and its proximity to Trimley St Martin to the north. There are therefore few obvious alternative locations for the expansion of its physical development limits. On this basis, there is considerably more potential to be looking at a further extension of the physical development limits of Trimley St Martin.

6.3 In so far as this consultation is concerned, clearly a further allocation on the northwestern side of Trimley St Martin would make a positive contribution towards housing delivery. Alternative Option Site 3022a is in a sustainable location and is not environmentally sensitive. It does not represent a risk of coalescence and is a natural and logical extension of the settlement with clear and defensible boundaries. It is contained to the north-east by the allotment gardens, by the existing built development in the western corner, the road and established settlement to the south. As set out below it is a deliverable site with no obvious constraints or limitations. It is available and could come forward very quickly to make an almost immediate contribution to boosting local housing supply. As such, it is considered that it should be identified as a preferred

residential site allocation.

Sustainability Appraisal

6.4 It is surprising that Alternative Option Site 3022a did not score more highly in the Preferred Options Sustainability Appraisal when compared to the preferred sites listed above.

C - 7307 - 3949 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7307 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

6.5 The overall assessment concluded for site 3022a as follows:

"The site scores well in terms of economic effects due to its close proximity to employment opportunities and given relatively good public transport provision. The loss of Grade 2 agricultural soil results in a major negative environmental effect. However, there may be scope for mitigation."

6.6 In response to the major negative environmental effect of using Grade 2 agricultural land, it is clear that there is no difference with the conclusions for a number of preferred allocations. The proposed site is on the boundary of grade 2/3 agricultural land. All undeveloped and proposed allocation sites within Trimley St.Mary and Trimley St.Martin are on Grade 2 Agricultural Land. The proposed site is therefore no more important for protection as agricultural land than the allocated sites and may in fact be less desirable due to the size of the site and the overall quality. One of the objectives where the site did not score very favourably was in respect of SA Objective 8, to improve the quality of life and where people live. The SA comment here incorrectly assumed that the site will be accessed via the adjoining estate roads and as such could potentially result in a negative

impact for local residents. The reality, as set out in more detail in the delivery statement below, is that access can be provided directly on to High Road.

6.7 In respect of the site assessments and commentaries for the preferred allocations set out in the AAP, there appear to be a number of reoccurring themes which do not necessarily appear to be reflected in the sustainability appraisals. These are as follows:

Air Quality: This is clearly an issue with air quality assessments being required for the majority of the preferred allocation sites. This is an issue, particularly associated with proximity of the sites to the urban area of Felixstowe and major transport routes including the A14. In respect of the majority of the preferred allocations, and in particular the largest sites, these are more closely related to the A14 and Felixstowe than Alternative Option Site 3022a. As such, simply on the basis of the degree of separation, it can be concluded that site 3022a will perform better in respect of air quality.

Sewage Capacity: Sewage capacity is an issue raised by Anglian Water in respect of the Felixstowe sites and the site in Kirton. These sites potentially require improvement to the capacity of the foul sewer network. This does not appear to be an issue for the Trimley Villages and as set out in the delivery strategy below a preliminary foul and surface water drainage strategy has already been prepared for Alternative Option Site 3022a.

Noise: The potential impact of noise does not appear to have been given much consideration. It should be noted, that some of the preferred allocations lie adjacent to junctions on the A14. These sites or parts thereof may be susceptible to noise disturbance which may require mitigation and/or potentially reduce the developable area. Alternative Option Site 3022a, lies to the south of the A14 separated by the established allotment gardens and as such is unlikely to be adversely affected by noise from the road.

Transport Assessments: The larger preferred option allocations will require transport assessments to be carried-out. These may potentially reveal highway safety or capacity issues which could impact on the quantum of development achievable and delay delivery. This would not be necessary with the scale of development proposed on Alternative Option Site 3022a.

Heritage Assets: A number of the preferred option sites have a close relationship with existing heritage assets. In some cases the SA scored these relationships to be positive on the basis that the setting may be improved. It does not necessarily seem reasonable that a site that will have an impact on heritage assets should score more highly than one where heritage assets are unaffected as is the case with Alternative Option Site 3022a.

6.8 In conclusion it is clear from the above that Alternative Option Site 3022a has many advantages over some of the preferred allocation sites and there are no obstacles to it coming forward for development. It is in a sustainable location and could readily deliver much needed housing, including affordable housing, a significant social benefit, with very limited environmental consequences. This assessment further supports the case that it should be included as a preferred allocation.

Deliverability

6.9 Trimley St Martin lies to the west of Felixstowe, between the A14 to the north-east and the railway line to the south-west. The village of Trimley St Mary lies immediately to the south east separated by a small gap. The 2011 Census reported the population of Trimley St Mary as 3,673 and the population of Trimley St Martin as 1,932. The two villages are immediately adjacent to Felixstowe and identified in the Core Strategy as Key Service Centres due to their extensive range of facilities and proximity to Felixstowe.

6.10 Alternative Option Site 3022a, is situated on the north-western side of the village. It lies to the east of High Road, which runs parallel with the A14, connecting Felixstowe via the A1156 to Ipswich. The south-eastern side of the site abuts the residential properties of Mill Close with extensive allotment gardens lying to the north-east. The western corner of the site contains a group of existing dwellings and buildings used for commercial purposes. Beyond the site to the north-west are arable fields.

6.11 The site was in part submitted and considered under the SHLAA 2014 (site 383a) it was discounted due to concerns regarding vehicle access. Mill Close was not considered to be suitable as an accesses route and the Highway

C - 7307 - 3949 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7307 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

Authority was not in favour of direct access from High Road.

6.12 Since 2014 extensive work has been undertaken by Pigeon Investment Management Ltd to overcome the concerns relating to access and demonstrate the sites deliverability. A summary of the work to date is set out below which demonstrates the site's deliverability.

Indicative layout plan

6.13 An indicative layout plan, drawing number 015 - 015 - 00 has been prepared for the site (see Appendix). This shows how the site could be developed to deliver a range of house types including 18 affordable units. The proposed layout demonstrates that the site can deliver housing which respects the surrounding pattern of development. A strong frontage along high Road will provide a connection between the existing settlement and the group of existing buildings to the west of the site. This will be focused around the new highway access which will create an attractive and framed entrance into the development. The internal layout picks up on pedestrian connectivity through to Mill Close providing some additional frontage plots in the eastern corner of the site.

Elsewhere the proposed dwellings and street layout seeks to extend the established pattern of buildings along the site boundaries. Open space and gardens are provided along the north-eastern boundary in order to respect the presence of the allotment gardens. A large area of open space to serve the development (and the existing village) is proposed to the north which will provide a sensitive edge and integration with the open farm land beyond.

6.14 The layout demonstrates that an appropriate density of development can be provided along with a range of house types. The proposed layout can also meet garden space requirements and parking provision while respecting the amenities of adjoining residential properties.

Affordable Housing

6.15 The indicative layout shows the site could include 18 affordable units, including a variety of house types and sizes to meet local need. This will be a significant local benefit.

Heritage Assessment

6.16 The site does not lie with or adjacent to a conservation area and there are no Listed Buildings or other Heritage Assets on or nearby.

6.17 A desk-based assessment of archaeological significance was undertaken in November 2015. This report concludes that there is no evidence that proposed development will have any impact on the significance or setting of designated heritage assets of archaeological interest. It suggests that development could have an impact on the significance of undesignated heritage assets indicated by crop marks but that their significance is unlikely to be sufficient to preclude development and impact on them may be mitigated by the formulation of an appropriate archaeological strategy.

Flood Risk

6.18 The entire site is located within Flood Zone1; land assessed as having a low probability of flooding from fluvial sources. In addition, the site is not identified to be at risk from surface water or reservoir flooding, according to the Environment Agencies Flood Maps for Planning.

6.19 The development will not increase the risk of flooding post development as attenuation measures will be provided on site as part of the proposal to accommodate surface water run-off generated from the critical duration 1 in 100 year event, including an allowance for climate change.

Drainage Strategy

6.20 A preliminary drainage strategy has been prepared for the site which concludes that foul water from the development will be able to flow via gravity to the existing Anglia water sewer located in the High Road.
6.21 In respect of surface water drainage the underlying geology is expected to be of high permeability which will allow surface water run-off to discharge via infiltration. It identifies that an infiltration basin can be provided within the public open space to accommodate surface water run-off from the proposed highway. The surface water from roofs can be discharged via soakaways with permeable paving included to drain the private access roads, parking areas and driveways.

Landscape and Visual Assessment

6.22 A landscape and visual assessment of the site has been carried out and it concludes that there is capacity within the landscape to absorb change.

6.23 It suggest that given the nature, character and visual quality of the existing settlement edge and the poor quality of the existing edges of the site, it has a High Capacity to accommodate change, and the potential to enhance the settlement edge.

6.24 As such there are few constraints or issues in landscape and visual terms that would prevent the site being considered for development.

Preliminary Ecological Appraisal

6.25 A preliminary ecological appraisal has been carried out for the site. Ten habitats were identified during the Extended Phase 1 Habitat Survey including scattered broadleaved and coniferous trees, scattered scrub, poor semi-improved grassland, scattered bracken, tall ruderal, arable, introduced shrub, and species-poor intact and defunct hedgerows. In addition the field margins on-site provide opportunity for common invertebrates, reptiles, birds, and foraging / commuting bats. The report makes a series of recommendations in respect of mitigation measures and good practice during development however, no Phase 2 survey work was required. It is clear that there are no ecological barriers to the

sites development.

C - 7307 - 3949 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7307 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

Transport Report

6.26 A transport report has been prepared for the site which concludes that the proposed development can be served by an acceptable access to the highway network. The report confirms that the site is located in a sustainable location with bus stops on the boundary providing frequent services and footway connections to local facilities.

6.27 A new access can be provided onto High Road which complies with highway standards and provides adequate visibility and capacity. The existing local infrastructure can support the additional traffic generated, including through the use of more sustainable modes of transport as alternatives to the private motor car, such as cycling, walking and public transport.

6.28 The transport report confirms that access can be provided directly onto High Road and that it will not be necessary to take access via Mill Close as assumed in the assessment of the SHLAA 2014 (site 383a). This therefore overcomes the key reason for the site being discounted due to concerns regarding vehicle access.

7 CONCLUSION

7.1 As set out above and referred to elsewhere in this consultation response Alternative Option Site 3022a is available and deliverable. There are no obstacles to its development and clearly proposals are at an advanced state. The indicative layout confirms that a policy compliant scheme can be delivered which will include market and affordable housing, a large area of open space and improved connectivity.

7.2 As indicated in the landscape and visual assessment, the proposed development will be an attractive addition to the settlement, improving the quality of existing north western edges of the village.

7.3 The site is not in a flood risk area and can be suitably served by both foul and surface water drainage.

7.4 Development of the site will have no impact on designated heritage assets and any impact on undesignated assets can be mitigated. Additionally, there are no ecological barriers to the sites development.

7.5 The site is in a sustainable location with good access to local services and facilities. A new point of vehicle access, which accords with adopted standards, can be provided to High Road overcoming the original reason for the site being discounted in the SHLAA 2014 (site 383a).

7.6 Policy FPP1 of the Felixstowe Peninsular AAP is still working to the Core Strategy target of 7,900 rather than the 11,000 OE figure or an up to date objectively assessed need, as required by Core Strategy Policy SP2. In addition, the current five year supply is not based on an up to date objectively assessed need. It is therefore contended, that the Felixstowe Peninsular AAP should take the opportunity to allocate more sustainable sites that can be delivered in order to meet the requirement of the NPPF to "significantly boost its supply of housing" and assist in the maintenance of a five year supply of housing land.

These sites should allow for variety in house types and tenures to come forward to meet local needs and ensure choice and competition in the market for land (NPPF paragraph 47).

7.7 In conclusion, it is clear that Alternative Option Site 3022a has many advantages over some of the preferred allocation sites and there are no obstacles to it coming forward for development. It is in a sustainable location and could readily deliver much needed housing, including affordable housing, a significant social benefit, with very limited environmental consequences. It does not represent a risk of coalescence and is a natural and logical extension of the settlement with clear and defensible boundaries.

7.8 For the reasons set out above it is clear that Alternative Option Site 3022a should be included as a preferred allocation in the Felixstowe Peninsular AAP.

APPENDICES [see attached documents]

See Attachments to Representation Submission for following documents:

- A. Location Plan
- B. Indicative Layout Plan
- C. Preliminary Drainage Appraisal (October 2015)
- D. Desk-based Archaeological Assessment
- E. Landscape and Visual Assessment (November 2015)
- F. Preliminary Ecological Appraisal
- G. Transport Report
- H. Phase 1 Contamination Report

Summary:

Land is identified at Sea Road, Felixstowe for a mixed use development of commercial / tourism uses and residential dwellings. (Indicative Capacity 40 dwellings) It is noted that this is a mixed use site and residential development will be dependent on There is also an issue with sewage capacity which may impact on viability. Finally if the market has to be relocated this could also significantly delay delivery.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

Appendix F - preliminary Ecology Appraisal Trimley.PDF Appendix H - Phase 1 Contamination Report (Pt2).pdf Appendix H - Phase 1 Contamination Report (Pt1).pdf Appendix G - Transport Statement (November 2015).pdf

C - 7307 - 3949 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7307 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

Appendix B - Indicative Layout Plan (015-015-002).pdf

Appendix E - FR 3659 Figure 1 Site Plan with Photo Locations(1).pdf

Appendix D - Trimley St Martin Desk Based Archaeological Assessment.pdf

Appendix E - Landscape and Visual Assessment Summary November 2015.pdf

Appendix C - Prelimiary Drainage Appriasal Nov 15 trimley.pdf

Appendix A - Location Plan Trimley.pdf

Appendix C - Prelimiary Drainage Appriasal Oct 15 trimley.pdf

Appendix E - FR 3659 Figure 2 Statutory Designations(1).pdf

Appendix E - FR 3659 Figure 3 Landscape and Heritage Designations and Public Rights of Way.pdf

Appendix E - FR 3659 Figure 4 Landscape Charcter Assessment.pdf

Appendix E - FR 3659 Figure 5 Photosheets_LR.pdf

C - 7381 - 3952 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7381 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

Respondent: Anglian Water (Mr Stewart Patience) [3952] Agent: N/A

Full Text:

Thank you for the opportunity to comment on the Site Allocations and Area Policies Preferred Options Document and Felixstowe Peninsula Area Action Plan. Please find enclosed comments on behalf of Anglian Water.

Site Allocations and Area Specific Policies Preferred Options Consultation Document

Policy SSP3: Land rear of Rose Hill, Saxmundham Road Aldeburgh

Anglian Water has no objection to the proposed allocation of this site for open market housing and a care home.

Paragraph 2.28 (page 30)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.28 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP4: Land at Mill Road Badingham

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.32 (page 32)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.32 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP5: Land Adjacent to Corner Cottages, Main Road, Benhall

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP6: Land south of Brook Cottage, Benhall

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.35 (page 34)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.35 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP7: Land opposite Townsfield Cottages, Dennington

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.40 (page 37)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.40 should be amended to refer to the management of surface water run off in

C - 7381 - 3952 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7381 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

accordance with the surface water management hierarchy.

Policy SSP8: Land south of Ambleside, Main Road, Kelsale cum Carlton

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.46

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.46 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP9: Land north of Mill Close, Orford

It is expected that there may be a need for improvements to the sewerage treatment capacity to enable the development of this site.

Policy SSP10: Land west of Garden Square Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP10:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP11: Land rear of 3 -33 Suffolk Drive, Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP11:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP12: Land north-east of Street Farm

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP12:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP13: Land fronting Old Homes Road, Thorpeness

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP13:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP14: Land south of Lower Road Westerfield.

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP15: Land at Old Station Works, Main Road Westerfield

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP15:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP16: Land at Street Farm, Witnesham (Bridge)

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP17: Land south of the primary school, Witnesham

Anglian Water has no objection to the proposed allocation of this site for residential development.

C - 7381 - 3952 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7381 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

Policy SSP18: Ransomes, Nacton Heath

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP13:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP19: Land at Silverlace Green(former airfield) Parham

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required.

Therefore it is recommended that these issues are investigated further and Policy SSP19 is amended accordingly.

Policy SSP20: former airfield Parham

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required.

Therefore it is recommended that these issues are investigated further and Policy SSP20 is amended accordingly.

Policy SSP21: former airfield Debach

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required. Therefore it is recommended that these issues are investigated further and Policy SSP21 is amended accordingly.

Policy SSP22: Bentwaters Park, Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP22:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP23: Carlton Park, Main Road, Kelsale cum Carlton

Anglian Water has no objection to the proposed allocation of this site for employment development.

Policy SSP24: Levington Park, Levington

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP24:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP25: Riverside Industrial Estate, Border Cot Lane, Wickham Market

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP25:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP31: Snape Maltings

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site for arts, recreation and tourism related development. It is therefore suggested that the following text should be include in Policy SSP25:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Felixstowe Peninsula Area Action Plan Preferred Options Consultation document

Policy FPP3:Land at Sea Road, Felixstowe

C - 7381 - 3952 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7381 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP4: Land north of Walton High Street, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP5: Land north of Conway Close, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is therefore suggested that the following text should be include in Policy FPP6:

'Improving the capacity of the foul sewerage network'

Policy FPP7: Land off Howlett Way, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is therefore suggested that the following text should be include in Policy FPP7:

'Improving the capacity of the foul sewerage network'

Policy FPP8: Land off Thurmans Lane, Trimley St Mary

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP8:

'Improving the capacity of the foul sewerage network'

Policy FPP9: Land at Bucklesham Road, Kirton

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Policy FPP9 refers to 'reinforcement of connections'

The term reinforcements is normally used in the context of water mains and not foul sewers when referring to improvements within the network.

It is therefore suggested that the following text should be include in Policy FPP9:

'Improving the capacity of the foul sewerage network through reinforcement of connections by making necessary improvements to ensure that capacity can be made available'

Policy FPP10: Port of Felixstowe

It is noted that it proposed to allocate land at the Port of Felixstowe for strategic employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Policy FPP11: Land at Bridge Road, Felixstowe

It is noted that it proposed to allocate land at Bridge Road for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Policy FPP12: Land at Carr Road/Langer Road, Felixstowe

It is noted that it proposed to allocate land Carr Road/Langer Road for employment uses.

C - 7381 - 3952 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7381 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP12:

'Improving the capacity of the foul sewerage network'

Policy FPP13: Land at Haven Exchange, Felixstowe

It is noted that it proposed to allocate land at Haven Exchange for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP13:

'Improving the capacity of the foul sewerage network'

Summary:

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Change to Plan

Appear at exam?
Not Specified

Legal?
Not Specified

Sound? Not Specified **Duty to Cooperate?**Not Specified

Soundness Tests

None

O - 7548 - 2762 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7548 Object

Housing Preferred Policy FPP3: Land at Sea Road, Felixstowe

Respondent: Mr Neil Ward [2762] Agent: N/A

Full Text: COMMENTS ON POLICY FPP3: LAND AT SEA ROAD, FELIXSTOWE

This is a brownfield site in a sustainable location, the development of which is capable of enhancing the appearance of the area. However, it is currently in commercial use as a market and redevelopment would be constrained by the additional costs of developing brownfield land; the costs of mitigating flood risk; and by the environmental impacts associated with low quality neighbouring development, on-street parking and traffic.

The draft Policy currently does not comply with NPPF guidance and Planning Practice Guidance in that it is overprescriptive and unrealistic. In particular:

- (i) It is inappropriate to require a mixed use development when there is no evidence that a commercial use on the site would be viable. All the evidence points in the opposite direction;
- (ii) A commercial use as part of a mixed development is likely to adversely affect the amenities of adjoining residents and would adversely affect the viability of the residential component;
- (iii) The frontage of this site has been allocated for tourism-related development since the Felixstowe Town Map in 1971. Maintenance of such a policy in the absence of any development taking place is contrary to paragraph 22 of the NPPF:
- (iv) The Policy should not attempt to dictate design parameters and thereby constrain design options without good reason. The Council would have full control over design at planning application stage when design as well as parking provision would need to be considered in the context of adopted Policies DM19, DM21 and DM22;
- (v) If relocation of the market is not a pre-requisite of redevelopment, reference to it should not be in the Policy;
- (vi) It is understood that Anglian Water's reference to the foul sewerage network is simply on the basis that improvement may be necessary. Again, if it is not a requirement it should not be in the Policy but surely this should, in any event, be covered by the Community Infrastructure Levy.

Objection to the Policy is therefore raised on the above grounds.

Summary:

This is a brownfield site in a sustainable location, the development of which is capable of enhancing the appearance of the area. However, it is currently in commercial use as a market and redevelopment would be constrained by the additional costs of developing brownfield land; the costs of mitigating flood risk; and by the environmental impacts associated with low quality neighbouring development, on-street parking and traffic.

The draft Policy currently does not comply with NPPF guidance and Planning Practice Guidance in that it is over-prescriptive and unrealistic.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7583 - 3839 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7583 Comment

Housing Preferred Policy FPP3: Land at Sea Road, Felixstowe

Respondent: Mr Steve McCullough [3839] Agent: N/A

Full Text:

I read with interest that some proposed developments within the peninsular area action plan, have the following paragraph attached. These are:-

- * SHLAA Ref 1011c, Sunday Market Site,
- * SHIAA Ref 451g, Land north of High St Walton,
- * SHLAA Ref 502e, Land north of Conway Close and
- * SHLAA Ref 383f and 451f, Land south Of Thurmans Lane, Trimley St Mary

"Anglian Water have identified that there is limited capacity in the foul sewerage network and the connections to this network may need tobe reinforced as a result of additional dwellings in this area. The capacity of the foul sewerage network is a constraint that needs to be overcome to the satisfaction of Anglian Water"

The routing of the Anglian Water outfall crosses a significant part of the Port Of Felixstowe's infrastructure. There has been an issue I have known about for the last five years, whereby at every high tide, a significant amount of treated water emerges from two drain covers in close proximity to the Main Office of Tomline House.

Anglian Water has advised the Port, it is due to their pump not being able to overcome the pressure of the tide against the outfall. The pump is required to run 24/7 to try and meet current demand and housing level.

To accommodate any new development, this situation surely must be remedied. If Anglian Water needs to upgrade their pipework capacity, they will have to excavate in some of the most recently developed areas of the Port and at considerable disruption to its Operations. Some of the network crosses a currently undeveloped site but it is only matter of time before the Port will want to incorporate this as part of its expansion programme.

Is Anglian Water prepared to undertake and pay for this multi million pound project?

Surely Suffolk Coastal District Council will want to see that Anglian Water have improved the infrastructure first, before considering any potential housing requirements?

Summary:

To accommodate any new development, this situation surely must be remedied. If Anglian Water needs to upgrade their pipework capacity, they will have to excavate in some of the most recently developed areas of the Port and at considerable disruption to its Operations. Some of the network crosses a currently undeveloped site but it is only matter of time before the Port will want to

incorporate this as part of its expansion programme.

Is Anglian Water prepared to undertake and pay for this multi million pound project?

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7595 - 3451 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7595 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

Respondent: Mr Michael Ninnmey [3451] Agent: N/A

Full Text:

In the previous response to the Consultation I requested whatever the "House Occupancy" was as E of E indicated back in 2004/5: which indicated that 50% of build was because less people in dwellings. What impact did 2008 crash have?

FPAAP

1.09

Sevenhill interchange suffers congestion already.

1.17

No reference to Health or wellbeing provision.

No reference on "Historic structures" A number at Risk.

2 02

No reference to Area pre- 1890 Walton has been erased!

2 10

By 2027! Children of many residents will have moved, because house building not meeting needs of local people, particularly low income young residents.

Para 3 Infrastructure Health & Sport. No proposal of provision.

2 11

The housing 1/4/2010 - 31/3/2015 has failed to deliver the agreed 106. Afford Housing.

FPP1

2010/13 1,003: no indication on map where? Misleading to 2027 land used.

EDD3

Alternative location for "open air market" visitor & tourist attraction.

Layout as Felix Multi plan?

Road facing Walton Hall: see Walton Green scheme:

- i) Retain rifle club, mitigate against noise on residents e.g acoustic barriers
- ii) Retain original coach house for Walton Hall!
- iii) HIDE NEW DEVELOPMENT BEHIND BOTH VALUED COMMUNITY ASSETS

FPP3 - 9

930 dwellings are to be added to rest of 1,003 plus windfall to access Felixstowe Port via jctn High road west/Garrison. This jctn has STANDING traffic back to HALF MOON Public hse NOW.

No mitigation shown on address this problem now a major concern in Walton - cum - Felixstowe is the Air Quality, (the H.R.W particularly has flood water through to the gravel.

Of increasing concern with VW rigging exhaust test.

Genera

- i) 106 agreement required provision of contribution to playspace and sports space: both of which are under provided. No indication as to how the C.I.L will make up for the shortfall and individual provision.
- ii) Community Hospital had 16 beds/no indication what extra to meet need of extra 5,000 people?
- iii) Map: fails to show position of the 1,003: The green lungs of Trimley St Martin, ST MARY, WALTON, OLD FELIXSTOWE at 2027 will only be PARKS & schools.
- iv) The buffer between settlements St Martin, ST MARY & WALTON gone.
- v) ECO-VILLAGE agreed in 2005 CS should be revised now or when 1,760 is reviewed.

4.06

The employment figures previously, have proved true?

How many "posts" are filled from outside FPAAP area? What will road traffic be by 2027? When the dual track completion date? Promise of a Ferry Quay to serve Harwich - Shotley - Felixstowe, ferry when?

No progress on supermarket provision?

No comment on underused land/council estate

Rail head in heart of Town H.R.W - Hamilton Rd, ST ANDREWS RD and GARRISON LANE.

Tourism

- i) Level footpath orwell to Deben fil in missing link of 300m? ASAP
- ii) Allow use of existing landing stages

Summary: Alternative location for "open air market" visitor & tourist attraction.

Layout as Felix Multi plan?

Road facing Walton Hall: see Walton Green scheme: Retain rifle club, mitigate against noise on residents Retain original coach house for Walton Hall!

C - 7595 - 3451 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7595 Comment

Housing Preferred Policy FPP3: Land at Sea Road, Felixstowe

HIDE NEW DEVELOPMENT BEHIND BOTH VALUED COMMUNITY ASSETS

930 dwellings are to be added to rest of 1,003 plus windfall to access Felixstowe Port via jctn High road west/Garrison. This jctn has STANDING traffic back to HALF MOON Public hse NOW.

No mitigation shown on address this problem now a major concern in Walton-cum-Felixstowe is the Air Quality

Change to Plan

Sound? **Duty to Cooperate?** Soundness Tests Legal? Appear at exam?

Not Specified Not Specified Not Specified Not Specified None

Attachments:

M Ninnmey Comments.pdf

C - 7679 - 2581 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7679 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text:

Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

- * FPP4 Walton Field evaluation has identified an Early-Middle Bronze Age funerary landscape across the site, with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.
- * FPP6 Trimley Cropmarks on this site show that there are complex archaeological remains of pits, ditches and a coaxial field system and trackways of possible late prehistoric date (TYN 122). Archaeological remains are therefore known on the site, although they have not been fully characterised.

Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7679 - 2581 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7679 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

Early Education

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The Government has indicated that it will legislate to double the number of hours' free childcare to 30. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

- In the Trimleys, developer contributions have already been secured to help manage the existing deficit in Early Years places and proposals are being drawn up to deliver additional places. Further development of the scale proposed (530 dwellings) will necessitate significant additional provision. Under current statutory arrangements, this would necessitate 53 additional places. When Land North of Walton High Street (400 dwellings) is included, the number of places required under current arrangements would increase to 93.

The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

- Development in the remainder of Felixstowe (150 dwellings North of Conway Close and 40 dwellings at Sea Road) can be managed by expanding existing settings.
- At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

The County Council would appreciate consideration of ways in which this policy could be more supportive of early education in retail centres, as part of a balanced policy which also protects the vitality and viability of retail centres. Policy FPP17 appears to implicitly support early education already, and discussion with the District Council may conclude that this policy is sufficient.

Primary Education

The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7679 - 2581 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7679 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

[see table in attached document]

Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

Grange Primary School can also expand, though this school is also not well related to the proposed allocations or future directions of growth.

Paragraphs 37 and 38 of the National Planning Policy Framework reflect the need to minimise the length of journeys to school and, for major developments, primary schools should be located within walking distance of most properties.

The best long term solution would be to reserve 2.2ha land for a new 315-place primary school and early years setting in a location which is well related to housing growth. This would also enable provision to be made for future growth, with another school capable of expansion.

Options for reserving land for a new primary school include:

- Land within 'Land North of Walton High Street'
- Land within another one of the Trimley sites
- Land in another location in the Trimleys, well related to sustainable travel routes and the new housing.

Secondary and Sixth Form Education

Based on standard pupil multipliers, development of 1,135 dwellings would be expected to generate an additional 204 secondary school pupils and an additional 45 sixth formers.

Felixstowe and the Trimleys are served by Felixstowe Academy. Based on the forecast below, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from the development proposed in this Plan.

[see table in attached document]

All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

Health, Wellbeing and Social Care

A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

C - 7679 - 2581 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7679 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

- * Ferry Road opposite site 502E
- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-

C - 7679 - 2581 - Preferred Policy FPP3: Land at Sea Road, Felixstowe - None

7679 Comment

Housing

Preferred Policy FPP3: Land at Sea Road, Felixstowe

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

FPP3 Transport Access and Traffic Issues. 40 units. No access issues. Could be accessed from Beach Station Road, Sea Road or Micklegate Road. Other detailed comments provided under headings sustainability (public rights of way) and collision history.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Felixstowe Sites FZ.pdf
Kirton Sites SW.pdf
2015-11-23 Felixstowe AAP_SCC Final Response.pdf
Felixstowe Sites SW.pdf
Kirton Sites FZ.pdf

S - 6721 - 3749 - 3.26 - None

6721 Support

Housing 3.26

Respondent: Mr Robert Whitehouse [3749] Agent: N/A

Full Text: This plot is already bounded on 4 sides by "built-up" land (including the A14 etc.) and should be considered to be within

the existing "Built-Up Area"

Summary: This plot is already bounded on 4 sides by "built-up" land (including the A14 etc.) and should be considered to be within

the existing "Built-Up Area"

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

O - 6794 - 3801 - 3.26 - None

6794 Object

Housing 3.26

Respondent: Mr Dominic Robb-Raven [3801] Agent: N/A

Full Text: As the primary entrance to the historic town of Felixstowe (centre from A14) and also as the demarker between this and

the industrical area of town, the use of this area of land would effectively remove the barrier between industrial and residential use. The current area serves as a good buffer to demark different areas of the town and construction on this site is not in consideration of the greater impact for the residents and visitors. More over with the likely development of Clickett Hill Road in to commercial usage (vast warehouse spanning the skyline) the further encroachment in to the village of Walton is not beneficial in maintaining the history and cultural heritage of the village of Walton and the town of Felixstowe. With the variety of sites in and around this area of Suffolk, the development is not appropriate for this location and moreover the infrastructure within Felixstowe does not need additional housing to support the population, As many people commute to Ipswich for work as do work in Felixstowe. More houses does not create more jobs and moreover Felixstowe is almost at saturation with employment - adding houses does nothing to create employment and

is more likely to cause detriment due to the lack on ongoing employment expansion.

Summary: The site is not suitable due to location

It is damaging to the historic nature of the site

It does not generate employment nor does it meet any housing need as the capacity of Felixstowe is almost reached in terms of probable employment and moreover many residents travel away from Felixstowe to work - more houses in

Felixstowe are not justifiable

Change to Plan Look to develop housing in a more greenfield site. If greenfield land MUST be used (which is nonsensical) then at least

use land that does not impact on the local residents - and moreover do not use land that natural demarks boundaries between residential and commercial land. Also building next to a very historic building (Toll Gate House) does not

serve to protect the historic building we ought to protect for many generations to come

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6981 - 3872 - 3.26 - None

6981 Comment

Housing 3.26

Respondent: Mr Howard Price [3872] Agent: N/A

Full Text: This open site currently provides a minimal buffer between Felixstowe and Trimley StMary which it is an exaggeration to

suggest the Dock Spur Road would continue to provide alone. The result of significant development here, not least when considered with the proposal for the site south of Waltonn High St, will be coalescence of the two settlements and

consequent loss of character.

Summary: This open site currently provides a minimal buffer between Felixstowe and Trimley StMary which it is an exaggeration to

suggest the Dock Spur Road would continue to provide alone. The result of significant development here, not least when considered with the proposal for the site south of Waltonn High St, will be coalescence of the two settlements and

consequent loss of character.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6798 - 3801 - 3.27 - None

6798 Object

Housing 3.27

Respondent: Mr Dominic Robb-Raven [3801] Agent: N/A

Full Text: Along with noted listed buildings that affect this development, it is being proposed to move a 100yr old building!

All this will destroy the historical significance of the site and local area - unnecessarily as Felixstowe does not have a

housing shortage and employment is unlikely to vastly grow to outstrip the current housing provisions

Summary: Along with noted listed buildings that affect this development, it is being proposed to move a 100yr old building!

All this will destroy the historical significance of the site and local area - unnecessarily as Felixstowe does not have a

housing shortage and employment is unlikely to vastly grow to outstrip the current housing provisions

Change to Plan Simply put - don't develop here

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7084 - 3894 - 3.27 - None

7084 Object

Housing 3.27

Respondent: Mr Richard Burrow [3894] Agent: N/A

Full Text:

Having read the Felixstowe Peninsula Area Action Plan I am pleased with much of the content in that many of the environmental issues have been identified. However, I disagree with the assumption that the town's growth is inevitable at the expense of greenfield sites and extra burdens on the sewage and highways networks. There is mention of 'organic growth'; the plans go far beyond this. Here are my observations:

- 3.01 There is a reference to the need for 807 new homes for the peninsula. How has this demand been identified? Is there actually a growing population or is valuable farmland and countryside being sacrificed to artificially create a demand for new housing for the benefit of developers? With Felixstowe's specific demographic, there is a natural turnover of the different types of housing as residents move through the different phases of their lives e.g. downsizing through retirement or infirmity, meaning that properties are regularly becoming available (with the possible exception of affordable homes for purchase by first time buyers).
- 3.27 The area between the A14 Spur, Candlet Road and High Street, Walton is valuable and productive farmland and effectively constitutes a green belt in all but name between the Trimleys and Walton. The suggested development would change the rural nature of the approach to Felixstowe and further urbanise Candlet Road, particularly with the planned new road junction. I feel strongly that it should remain as farmland. The same argument applies to the other large greenfield sites identified, Poultry and Mill farms.
- 3.39 Development of this site to the north of Conway Close will contribute to the spread of the town into open countryside as well as causing ribbon development along Ferry Road. The fears that new housing in this area will impinge on Gulpher Lane in terms of traffic are very real; Colneis Road will definitely suffer increased vehicle use. This rural fringe of Old Felixstowe is picturesque and should be protected, in my opinion.
- 6.0 There is no mention in the document of the contribution of sea angling to the local economy, a strange omission for a town with a long tradition of fishing. I fish the local beaches twice a week on average and am impressed by how far visiting anglers travel to our shores. Perhaps there should be some appropriate signage identifying suitable fishing areas, launching sites, species with size limits etc. and the provision of vantage points for disabled anglers could be a possibility. Measures to promote such a healthy outdoor activity could be very beneficial to Felixstowe. Any putative redevelopment of the pier could have some planning requirements encouraging the attachment of a fishing jetty-Southwold Pier was built with this feature as part of the design.
- 6.34/ 6.35 Many vehicle enthusiasts see Felixstowe as destination of choice. The local plan could incorporate provision in the form of a designated sea front space (a car park on other days) that is bookable by, for example, classic car or motorcycle clubs, scooter enthusiasts etc. This would serve such organisations with the bonus of providing additional attractions for both visitors and residents in a regulated environment.

Summary:

The area between the A14 Spur, Candlet Road and High Street, Walton is valuable and productive farmland and effectively constitutes a green belt in all but name between the Trimleys and Walton. The suggested development would change the rural nature of the approach to Felixstowe and further urbanise Candlet Road, particularly with the planned new road junction. I feel strongly that it should remain as farmland. The same argument applies to the other large greenfield sites identified, Poultry and Mill farms.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7501 - 4022 - 3.27 - None

7501 Comment

Housing 3.27

Respondent: Patrick Haseman [4022] Agent: N/A

Full Text:

We will never have enough of so called affordable homes. Every time a policy is passed it comes back with less because the developer wants more profit.

The whole area is taking way over the top of housing for the whole eastern region. We do not need this many homes.

Policy Fpp4; Land North of Walton High Street

First I must stress I'm opposed to any building on this land as it is dedicated grade one farm land and should be left as

such.

But if the powers to be decide this is acceptable then I would like to make the following comments.

3.27

The reallocating the Rifle Club to put in place unneeded industrial units to form a buffer between the residential area and the Dock Spur Road. The expense of moving the Rifle Club which has been there for many years to a new location seems so unnecessary when it is already providing the buffer you require.

3.32

It was proved when the Tesco's application was submitted that Walton High Street could not cater for any extra traffic. Providing a link road between Cadlett Road and Walton High Street will become a rat run for traffic going to the Port using Maidstone Road another Road which is over used.

3.33

The original plans for the Academy had the main building backing on to the railway line but it was brought forward so this development could go ahead. Again it would be bringing more traffic onto the over use Walton High Street. Would it not be better to use this are for recreational purposes such as playing a sports area seeing it is adjacent to the Felixstowe Academy.

Summary:

The reallocating the Rifle Club to put in place unneeded industrial units to form a buffer between the residential area and the Dock Spur Road. The expense of moving the Rifle Club which has been there for many years to a new location seems so unnecessary when it is already providing the buffer you require.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7531 - 4038 - 3.27 - None

7531 Comment

Housing 3.27

Respondent: Felixstowe Rifle Club (Mr John Humphries) [4038] N/A Agent:

Full Text: Page 25 Walton 3.27

> Reference Felixstowe Rifle Club, my views towards 'needs of the local community' are as follows. The club is the shooting base for visually impaired shooters - Mencap sports shooters and it is the eastern area hub for disability shooting - Great Britain. Plus 120 local members who shoot all calibres.

3.27

The most suitable approach would be to leave the club which abuts the A14 dock spur road, create large earth bunds to be a buffer between the club and any new employment opportunities i.e. business units which will come along. There

will be no street parking. The foul sewerage network is already in place.

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shooting base for visually impaired shooters-Mencap sports shooters and it is the eastern area hub for disability

shooting-Great Britain. Plus 120 local members who shoot all calibres.

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will be no street parking. The foul sewerage network is already in place.

Change to Plan

Legal? Sound? **Duty to Cooperate?** Soundness Tests Appear at exam? Not Specified Not Specified None

Not Specified Not Specified

C - 6983 - 3872 - 3.28 - None

6983 Comment

Housing 3.28

Respondent: Mr Howard Price [3872] Agent: N/A

Full Text: The proximity of the Dock Spur Road with its heavy goods traffic suggests a noise assessment will also be required.

Summary: The proximity of the Dock Spur Road with its heavy goods traffic suggests a noise assessment will also be required.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7088 - 3895 - 3.28 - None

7088 Comment

Housing 3.28

Respondent: Ms C.H Haniford [3895] Agent: N/A

Full Text:

Comments on the Felixstowe Peninsula Area Action Plan

Para 3.0 Housing 3.28 & 3.29 Air Quality. How necessary would it be to have business units here? It's quite close to the proposed Strategic Employment area. There could be a risk of further pollution from some activities. Why not create a small shopping area?

SHLAA ref 451g

3.31 Is this to be high density housing?

3.32 Candlet Road is already unable to cope with traffic in the morning & evening rush hours - how would you improve this situation by the additional traffic from the proposed development? Would you introduce a cycle route to the Strategic Employment Area?

3.35 Access for walkers should continue across Candlet Road - perhaps a pedestrian bridge would ease safety concerns.

3.36 Anglia Water have commented here and elsewhere on the pressure on their network - what is to be done about this?

page 28 3.40, 3.41, 3.44 Density on this proposed site appears to be greater than on the adjoining site i.e. you propose 150 dwellings and the adjacent area of a similar size contains 32 dwellings. How necessary is it to create such a high density development in this area?

& page 29 3.45 The access to this site could be problematic as Gulpher Road is narrow and rural with several awkward bends, which is quite manageable when it's quiet, however a major (potential) increase could create unnecessary pollution and vehicular hazards.

SHLAA Ref 502e Overall Assessment The site can hardly be described as "central". Nor is it particularly close to "key services", unless you have transport, good mobility or no children.

4.0 Employment 4.04 Regarding rail services: there appears to be a conflict of interests between the needs of passengers and those of the port (and its less polluting mode of transportation of their containers) - what is to be done? Better and more reliable links for passengers would benefit tourism from further afield as well as better access for local people wishing to use the trains for long distance travel.

5.0 Retail FPP 14 p.52 Shared Space scheme - has there been any evidence gathered on how this is working out? Are there any proposals to limit access at Weekends?

6.0 Tourism & Sea Front p.71 Car Parking - on the day of 'Art on the Prom' there were half empty car parks and overflowing pavements in nearby streets, such as Princes Road and Queens Road. This often happens when there is a big event on the prom.

Summarv:

Para 3.0 Housing 3.28 & 3.29 Air Quality. How necessary would it be to have business units here? It's quite close to the proposed Strategic Employment area. There could be a risk of further pollution from some activities. Why not create a small shopping area?

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6649 - 3234 - 3.29 - None

6649 Object

Housing 3.29

Respondent: Mrs Julie Cornforth [3234] N/A Agent:

Full Text: Why have business units been mentioned now? In all the other previous consultations this issue has NEVER been

included! Whose idea was it? And why have the public never been told about it? I think this is a serious issue that

should be looked into. Surely you cannot just add additional things at the last moment. THE PEOPLE OF

FELIXSTOWE SHOULD BE INFORMED NOW!!!

Why have business units been mentioned now? In all the other previous consultations this issue has NEVER been Summary:

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Duty to Cooperate?

Soundness Tests

FELIXSTOWE SHOULD BE INFORMED NOW!!!

Don't add in additional things without telling the people! It's underhand! What else has the member/s of the WORKING Change to Plan

GROUP hidden from us?

Legal?

Sound? Not Specified Not Specified Not Specified Not Specified None

Attachments:

Appear at exam?

O - 6738 - 3782 - 3.29 - None

6738 Object

Housing 3.29

Respondent: Mary Wyatt [3782] Agent: N/A

Full Text: There is little need for business units - Anzarny House by the docks is being changed into flats after being empty for a

number of years. Other business units at Searsons Farm remain unfilled.

Summary: There is little need for business units - Anzarny House by the docks is being changed into flats after being empty for a

number of years. Other business units at Searsons Farm remain unfilled.

Change to Plan No need for business units on this site.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6795 - 3801 - 3.29 - None

6795 Object

Housing 3.29

Respondent: Mr Dominic Robb-Raven [3801] N/A Agent:

Full Text: With a derelict sea front, the proposal that generating more employment by displacing this opportunity from the town

centre and sea front does not make logical sense. There are plenty of opportunities to generate meaningful employment which is self funded by tourism by using the existing infrastructure and funding improvements

With a derelict sea front, the proposal that generating more employment by displacing this opportunity from the town Summary:

centre and sea front does not make logical sense. There are plenty of opportunities to generate meaningful

employment which is self funded by tourism by using the existing infrastructure and funding improvements

Do not build employment 'units' here. Generate employment that is sustainable by regenerating the sea front and Change to Plan

fostering tourism year round

Appear at exam? Legal? Sound? **Duty to Cooperate? Soundness Tests**

Not Specified Not Specified Not Specified Not Specified None

C - 6766 - 3060 - 3.30 - None

6766 Comment

Housing 3.30

Respondent: Felixstowe Town Council (Mr Ash Tadjrishi) [3060] Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Preferred Options Consultation

Thank you for the opportunity to respond to the Suffolk Coastal District Council Felixstowe Peninsula Area Action Plan Preferred Options paper. The Town Council considered this matter at its meeting of 11 November 2015.

Felixstowe Town Council was pleased to welcome and endorse the Felixstowe Peninsula Area Action Plan Preferred Options, subject to the following comments:

Page 13, Para. 2.02

We recommend adding the following to the end of the final sentence of this paragraph: ", as required by the July 2013 Local Plan."

Page 24, FPP3

Remove "(for residents and visitors)" from the bottom bullet relating to appropriate parking provision.

Page 26, Para. 3.30

This paragraph has been reduced in scope from an earlier draft and no longer references the unique location this site holds as a gateway to Felixstowe. It is vital that the policy ensures that any proposals for development of this site include appropriate consideration for this gateway and the statement this makes to those arriving to Felixstowe by road.

Page 27, FPP4

Remove "and Candlet Road" from the first bullet point. Any business units for this site should be restricted to the land adjacent to the A14 Dock Spur only.

Page 27, Title of 3.39

The title should read "Land" rather than "Lane" and include Swallow Close.

Page 29, FPP5

Please include Swallow Close and refer to this site as the "Land north of Conway Close and Swallow Close" throughout.

Page 49, Para. 5.06

Given the latest available information on these sites, this paragraph should be removed.

Page 50, Inset Map

The secondary shopping frontage should continue along Bent Hill on both sides of the road. It should also include the frontage of Trinity Methodist Church on Hamilton Road for consistency. Likewise the primary shopping area shaded in green should include this same section.

Page 51, Para. 5.10

Sentence should end "other than town centre uses".

Page 51, Para. 5.12

Please amend the final two sentences to read as follows:

"The scheme was not completed between Orwell Road and Bent Hill and the AAP will seek to encourage the continuation of the Shared Space along Hamilton Road. The completion of this scheme within the town centre boundary will provide a continuous link between Hamilton Road and Bent Hill and reinforce the connections between the town centre and the sea front."

Page 54, FPP15

Please amend the first paragraph to read "Any change of use proposals in this area should seek to retain a high proportion of retail activity."

Page 68, FPP21

Correction: "The provision of beach huts will be limited to those which currently exist. Any increased provision will be directed towards other parts of the sea front (namely Felixstowe Ferry Golf Club to Cobbolds Point Preferred Policy FPP19) as appropriate."

Page 74, FPP24

The policy should open with the following opening sentence:

"The need to strengthen Felixstowe as a seaside destination is recognised."

The next sentence should read: "Holiday accommodation will be encouraged and supported"

Page 82, FP27

This should be titled FPP27 rather than FP27.

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

C - 6766 - 3060 - 3.30 - None

6766 Comment

Housing 3.30

Please revise the first line of text to read "Spa Gardens and Town Hall Gardens".

Appendix 7:Felixstowe, Trimley St. Mary & Trimley St. Martin Inset Map.

The Physical Limits boundary in regard to the seaward boundary should be drawn as in the 2001 Local Plan map - i.e disappear in to the sea rather than be drawn along the low water mark.

The dotted blue line denoting Proposed Tourism Areas is misleading and these areas should be marked out to define the landward extent and total area covered by those corresponding policies. Landguard peninsula should also be encapsulated whereas the line appears to end at Landguard point. As above, the lines between the areas should simply stop at the sea. The extensions of those lines into the sea can be wrongly interpreted as representing a policy as applying to an element of the sea.

The port area should be included within the Physical Limits boundary as is the case in the 2001 Local Plan map. The Physical Limits boundary in the Manor End area should include the caravan parks and Custom House, terminating at the boundary of Landguard Common.

The colouring of some of the designations on the main map are confusingly similar, notably those for the Proposed District Centre, the District Centre boundary and the revised Physical Limits boundary. Also, the use of very heavy lines at the scale of the main map is unhelpful.

Notwithstanding these observations, thank you for the opportunity to have been consulted. The Town Council looks forward to receiving information on the further development of the Area Action Plan.

Summary:

Page 26, Para, 3,30

This paragraph has been reduced in scope from an earlier draft and no longer references the unique location this site holds as a gateway to Felixstowe. It is vital that the policy ensures that any proposals for development of this site include appropriate consideration for this gateway and the statement this makes to those arriving to Felixstowe by road.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

AAP Preferred Options Consultation Response.pdf

C - 6799 - 3801 - 3.30 - None

6799 Comment

Housing 3.30

Respondent: Mr Dominic Robb-Raven [3801] Agent: N/A

Full Text: The location does not encourage development. It encourages being left as a green space that can be enjoyed as what

it is - agricultural land on the edge of an otherwise largely commercial town. Do not destroy this local natural piece of

land.

Summary: The location does not encourage development. It encourages being left as a green space that can be enjoyed as what

it is - agricultural land on the edge of an otherwise largely commercial town. Do not destroy this local natural piece of

land.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7089 - 3895 - 3.31 - None

7089 Comment

Housing 3.31

Respondent: Ms C.H Haniford [3895] Agent: N/A

Full Text:

Comments on the Felixstowe Peninsula Area Action Plan

Para 3.0 Housing 3.28 & 3.29 Air Quality. How necessary would it be to have business units here? It's quite close to the proposed Strategic Employment area. There could be a risk of further pollution from some activities. Why not create a small shopping area?

SHLAA ref 451g

3.31 Is this to be high density housing?

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3.35 Access for walkers should continue across Candlet Road - perhaps a pedestrian bridge would ease safety concerns.

3.36 Anglia Water have commented here and elsewhere on the pressure on their network - what is to be done about this?

page 28 3.40, 3.41, 3.44 Density on this proposed site appears to be greater than on the adjoining site i.e. you propose 150 dwellings and the adjacent area of a similar size contains 32 dwellings. How necessary is it to create such a high density development in this area?

& page 29 3.45 The access to this site could be problematic as Gulpher Road is narrow and rural with several awkward bends, which is quite manageable when it's quiet, however a major (potential) increase could create unnecessary pollution and vehicular hazards.

SHLAA Ref 502e Overall Assessment The site can hardly be described as "central". Nor is it particularly close to "key services", unless you have transport, good mobility or no children.

4.0 Employment 4.04 Regarding rail services: there appears to be a conflict of interests between the needs of passengers and those of the port (and its less polluting mode of transportation of their containers) - what is to be done? Better and more reliable links for passengers would benefit tourism from further afield as well as better access for local people wishing to use the trains for long distance travel.

5.0 Retail FPP 14 p.52 Shared Space scheme - has there been any evidence gathered on how this is working out? Are there any proposals to limit access at Weekends?

6.0 Tourism & Sea Front p.71 Car Parking - on the day of 'Art on the Prom' there were half empty car parks and overflowing pavements in nearby streets, such as Princes Road and Queens Road. This often happens when there is a big event on the prom.

Summary: Is this to be high density housing?

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6797 - 3801 - 3.32 - None

6797 Object

Housing 3.32

Respondent: Mr Dominic Robb-Raven [3801] Agent: N/A

Full Text: More roads equals more traffic and by creating a link road you will in effect create a 'rat run' for traffic which will increase

the risk to cyclists and pedestrians and reduce the current high usage of bicycles.

Summary: More roads equals more traffic and by creating a link road you will in effect create a 'rat run' for traffic which will increase

the risk to cyclists and pedestrians and reduce the current high usage of bicycles.

Change to Plan No development = no link road = no issues as above

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6918 - 1968 - 3.32 - None

6918 Object

Housing 3.32

Respondent: R Wood [1968] Agent: N/A

Full Text: A link road would indeed ease traffic pressure on High Road, but ingress/egress onto Candlet Road near to Docks Spur

roundabout will cause a greater bottleneck of traffic going in and out for the rest of the town, both existing traffic and

also pressure caused by additional housing being proposed elsewhere in Felixstowe as part of this plan.

Summary: A link road would indeed ease traffic pressure on High Road, but ingress/egress onto Candlet Road near to Docks Spur

roundabout will cause a greater bottleneck of traffic going in and out for the rest of the town, both existing traffic and

also pressure caused by additional housing being proposed elsewhere in Felixstowe as part of this plan.

Change to Plan Delete link road, or find alternative access to the A14 that does to emerge near the docks roundabout on Candlet Road.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6982 - 3872 - 3.32 - None

6982 Comment

Housing 3.32

Respondent: Mr Howard Price [3872] Agent: N/A

Full Text: Such a link road is likely to require the widening of Candlet Road to facilitate safe turning.

Summary: Such a link road is likely to require the widening of Candlet Road to facilitate safe turning.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7090 - 3895 - 3.32 - None

7090 Comment

Housing 3.32

Respondent: Ms C.H Haniford [3895] Agent: N/A

Full Text:

Comments on the Felixstowe Peninsula Area Action Plan

Para 3.0 Housing 3.28 & 3.29 Air Quality. How necessary would it be to have business units here? It's quite close to the proposed Strategic Employment area. There could be a risk of further pollution from some activities. Why not create a small shopping area?

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Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7502 - 4022 - 3.32 - None

7502 Comment

Housing 3.32

Respondent: Patrick Haseman [4022] Agent: N/A

Full Text:

We will never have enough of so called affordable homes. Every time a policy is passed it comes back with less because the developer wants more profit.

The whole area is taking way over the top of housing for the whole eastern region. We do not need this many homes.

Policy Fpp4; Land North of Walton High Street

First I must stress I'm opposed to any building on this land as it is dedicated grade one farm land and should be left as

But if the powers to be decide this is acceptable then I would like to make the following comments.

3.27

The reallocating the Rifle Club to put in place unneeded industrial units to form a buffer between the residential area and the Dock Spur Road. The expense of moving the Rifle Club which has been there for many years to a new location seems so unnecessary when it is already providing the buffer you require.

3.32

It was proved when the Tesco's application was submitted that Walton High Street could not cater for any extra traffic. Providing a link road between Cadlett Road and Walton High Street will become a rat run for traffic going to the Port using Maidstone Road another Road which is over used.

3.33

The original plans for the Academy had the main building backing on to the railway line but it was brought forward so this development could go ahead. Again it would be bringing more traffic onto the over use Walton High Street. Would it not be better to use this are for recreational purposes such as playing a sports area seeing it is adjacent to the Felixstowe Academy.

Summary:

It was proved when the Tesco's application was submitted that Walton High Street could not cater for any extra traffic. Providing a link road between Cadlett Road and Walton High Street will become a rat run for traffic going to the Port using Maidstone Road another Road which is over used.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot Specified

C - 7503 - 4022 - 3.33 - None

7503 Comment

Housing 3.33

Respondent: Patrick Haseman [4022] Agent: N/A

Full Text:

We will never have enough of so called affordable homes. Every time a policy is passed it comes back with less because the developer wants more profit.

The whole area is taking way over the top of housing for the whole eastern region. We do not need this many homes.

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Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7091 - 3895 - 3.35 - None

7091 Comment

Housing 3.35

Respondent: Ms C.H Haniford [3895] Agent: N/A

Full Text:

Comments on the Felixstowe Peninsula Area Action Plan

Para 3.0 Housing 3.28 & 3.29 Air Quality. How necessary would it be to have business units here? It's quite close to the proposed Strategic Employment area. There could be a risk of further pollution from some activities. Why not create a small shopping area?

SHLAA ref 451g

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SHLAA Ref 502e Overall Assessment The site can hardly be described as "central". Nor is it particularly close to "key services", unless you have transport, good mobility or no children.

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Summarv:

Access for walkers should continue across Candlet Road - perhaps a pedestrian bridge would ease safety concerns.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6796 - 3801 - 3.36 - None

6796 Object

Housing 3.36

Respondent: Mr Dominic Robb-Raven [3801] Agent: N/A

Full Text: This re-enforces the message that the infrastructure, generally, is not sufficient and you will impose massive disruption

to current residents by continuing with this scheme.

Summary: This re-enforces the message that the infrastructure, generally, is not sufficient and you will impose massive disruption

to current residents by continuing with this scheme.

Change to Plan Find another greenfield site and rather than try and 'adapt' it to suit, engage in a bespoke design to create a low/zero

carbon housing provision which does not require the local infrastructure modifying to encompass this.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7092 - 3895 - 3.36 - None

7092 Comment

Housing 3.36

Respondent: Ms C.H Haniford [3895] Agent: N/A

Full Text:

Comments on the Felixstowe Peninsula Area Action Plan

Para 3.0 Housing 3.28 & 3.29 Air Quality. How necessary would it be to have business units here? It's quite close to the proposed Strategic Employment area. There could be a risk of further pollution from some activities. Why not create a small shopping area?

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Summary:

Anglia Water have commented here and elsewhere on the pressure on their network - what is to be done about this?

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6567 - 3696 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

6567 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Mr Roy Gray [3696] Agent: N/A

Full Text: I have the following objections to the plan-

1.Proposed building on Grade 1 Agricultural land, this is top quality land and one of the few areas of Grade 1 Land in Suffolk and this land is essential to future agricultural needs.

2.Foul water disposal will be problem it is mentioned in report Felixstowe Pumping Station situated near Port area is already under strain and the additional houses planned will almost certainly mean that it would be able to cope plus would probably require additional eqpt to be installed as distance from location.

3 Proposed link road from Candlet to High Street would not ease road traffic in this area of Walton with parents delivering/collecting children to Academy. and would be a rat run, plus with 190 dwellings planned to be built alongside Academy behind Walton Hall the High Street and High Road Trimley will be congested at most times.

4, The Academy will not be able to cope with the number of probable young scholars neither will the junior schools in Felixstowe/Trimley.

5. Doctors there is on GP surgery in Felixstowe which is already very busy and would not be able to cope with the potential number of patients. As is known there is a shortage of G P s throughout Suffolk and the 4 surgeries in Felixstowe are all short of Doctors.

6. Air pollution has already been a problem around the Dooley/Port area and these additional houses will add to the problem with more traffic in area.

Summary: Proposed building on Grade 1 Agricultural land.

Foul water disposal will be problem it is mentioned in report Felixstowe Pumping Station situated near Port area. Link road from CandletRoad-High Street would not ease road traffic in this area with parents delivering/collecting children to Academy.

Lack of capactiy in Academy and Schools.

Shortage of G P s throughout Suffolk and the 4 surgeries in Felixstowe are all short of Doctors.

Air pollution already a problem around the Dooley/Port area and these additional houses will add to the problem with

more traffic in area.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot Specified

C - 6631 - 2963 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

6631 Comment

Full Text:

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Suffolk Coastal District Council (SCDC Agent: N/A

Environmental Protection) [2963]

I would like to comment, with regard to air quality, on the above Preferred Options Consultation as follows:

1) Felixstowe Peninsula Area Action Plan

* Land North of High Street, Walton - SHLAA Ref 451g

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* Land rear of Conway Close, Felixstowe - SHLAA Ref 502e

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

- * Land opposite Hand in Hand Public House, Trimley St. Martin SHLAA Ref 451b Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.
- * Land off Howlett Way, Trimely St. Martin SHLAA Ref 451d and 451c Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with both of these sites.
- * Land South of Thurmans Lane, Trimley St. Mary SHLAA Ref 383f and 451f Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with both of these sites.

* Employment

Land at Haven Exchange

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

- 2) Site Allocations & Area Specific Policies Development Plan Document
- * SSP10 Garden Square, Rendlesham

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* SSP11 - 3-33 Suffolk Drive, Rendlesham

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* SSP22 - Bentwaters Park, Rendlesham

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* SSP 31 - Snape Maltings

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

Other comments

With regard to the Neighbourhood Plans for Woodbridge, Kesgrave and Leiston (and any others in the pipeline), we have particular concerns about developments with the potential to impact upon the volume and/or types of vehicular traffic at the Woodbridge Air Quality Management Area.

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

C - 6631 - 2963 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

6631 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

It is sometimes difficult to convey to developers the importance of AQ impacts in respect of developments which may be, (by their own judgement) a significant distance from the Woodbridge AQMA; however, efforts to find ways of reducing the elevated levels of transport-related pollutants at this location to below the levels required by the EU Air Quality Directive (and UK regulations) have consistently failed to produce the required improvements in the 10 years or so since this AQMA was declared. This failure could result in financial penalties to the UK government from the EU. We are assured that any such penalties will be passed on to LAs with "failing" AQMAs in their districts. Consequently, we need to leave no stone un-turned in our examination of any proposed larger scale development (whether housing or otherwise) which has the potential to increase vehicle traffic at the existing Woodbridge Junction AQMA is consequently a matter of serious concern. Any such scheme must be accompanied by technical and robust modelling to predict the impact on traffic at this AQMA, accompanied by and assessment of the possible methods of mitigating those impacts.

The same general comments apply to some areas where our modelling/sampling indicates AQ thresholds are under pressure (but not yet breached) from transport-related sources.

Summary:

* Land North of High Street, Walton - SHLAA Ref 451g Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

Change to Plan

Appear at exam?
Not Specified

Legal? Sound?

Duty to Cooperate?

Soundness Tests

Not Specified Not Specified Not Specified None

O - 6653 - 3234 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

6653 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Mrs Julie Cornforth [3234] Agent: N/A

Full Text: Build on brownfield sites first, not prime agricultural land.

Summary: Build on brownfield sites first, not prime agricultural land.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6745 - 3785 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

6745 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Stephen Wyatt [3785] Agent: N/A

Full Text: I object to the use of this site for development of any kind. The first ground is that this is Grade 1 agricultural land. It is

the stated aim in all relevant plans that wherever possible Grade 1 farming land should not be used. See for example Core Strategy SP 1, 6, 9 and 15; National Planning Framework paras 7,23,24 and 27; Local Plan Policies ASP 55, 56

and 6.

The second ground of my objection is that the development of "business units" could easily turn into retail units and adversely affect the town centre's viability. The third objection is that insufficient attention s being given to Anglian

Water's concern about the capacity of the sewage system.

Summary: I object on three grounds. First, this is grade 1 agricultural land. Secondly, the inclusion of business units will adversely

affect the town centre's viability. Thirdly, insufficient attention has been given to the capacity of the sewage system to

cope

Change to Plan Delete this proposal from the plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6767 - 3060 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

6767 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

Respondent: Felixstowe Town Council (Mr Ash Tadjrishi) [3060] Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Preferred Options Consultation

Thank you for the opportunity to respond to the Suffolk Coastal District Council Felixstowe Peninsula Area Action Plan Preferred Options paper. The Town Council considered this matter at its meeting of 11 November 2015.

Felixstowe Town Council was pleased to welcome and endorse the Felixstowe Peninsula Area Action Plan Preferred Options, subject to the following comments:

Page 13, Para. 2.02

We recommend adding the following to the end of the final sentence of this paragraph: ", as required by the July 2013 Local Plan."

Page 24, FPP3

Remove "(for residents and visitors)" from the bottom bullet relating to appropriate parking provision.

Page 26, Para. 3.30

This paragraph has been reduced in scope from an earlier draft and no longer references the unique location this site holds as a gateway to Felixstowe. It is vital that the policy ensures that any proposals for development of this site include appropriate consideration for this gateway and the statement this makes to those arriving to Felixstowe by road.

Page 27, FPP4

Remove "and Candlet Road" from the first bullet point. Any business units for this site should be restricted to the land adjacent to the A14 Dock Spur only.

Page 27, Title of 3.39

The title should read "Land" rather than "Lane" and include Swallow Close.

Page 29, FPP5

Please include Swallow Close and refer to this site as the "Land north of Conway Close and Swallow Close" throughout.

Page 49, Para. 5.06

Given the latest available information on these sites, this paragraph should be removed.

Page 50, Inset Map

The secondary shopping frontage should continue along Bent Hill on both sides of the road. It should also include the frontage of Trinity Methodist Church on Hamilton Road for consistency. Likewise the primary shopping area shaded in green should include this same section.

Page 51, Para. 5.10

Sentence should end "other than town centre uses".

Page 51, Para. 5.12

Please amend the final two sentences to read as follows:

"The scheme was not completed between Orwell Road and Bent Hill and the AAP will seek to encourage the continuation of the Shared Space along Hamilton Road. The completion of this scheme within the town centre boundary will provide a continuous link between Hamilton Road and Bent Hill and reinforce the connections between the town centre and the sea front."

Page 54, FPP15

Please amend the first paragraph to read "Any change of use proposals in this area should seek to retain a high proportion of retail activity."

Page 68, FPP21

Correction: "The provision of beach huts will be limited to those which currently exist. Any increased provision will be directed towards other parts of the sea front (namely Felixstowe Ferry Golf Club to Cobbolds Point Preferred Policy FPP19) as appropriate."

Page 74, FPP24

The policy should open with the following opening sentence:

"The need to strengthen Felixstowe as a seaside destination is recognised."

The next sentence should read: "Holiday accommodation will be encouraged and supported"

Page 82, FP27

This should be titled FPP27 rather than FP27.

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

C - 6767 - 3060 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

6767 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

Please revise the first line of text to read "Spa Gardens and Town Hall Gardens".

Appendix 7:Felixstowe, Trimley St. Mary & Trimley St. Martin Inset Map.

The Physical Limits boundary in regard to the seaward boundary should be drawn as in the 2001 Local Plan map - i.e disappear in to the sea rather than be drawn along the low water mark.

The dotted blue line denoting Proposed Tourism Areas is misleading and these areas should be marked out to define the landward extent and total area covered by those corresponding policies. Landguard peninsula should also be encapsulated whereas the line appears to end at Landguard point. As above, the lines between the areas should simply stop at the sea. The extensions of those lines into the sea can be wrongly interpreted as representing a policy as applying to an element of the sea.

The port area should be included within the Physical Limits boundary as is the case in the 2001 Local Plan map. The Physical Limits boundary in the Manor End area should include the caravan parks and Custom House, terminating at the boundary of Landguard Common.

The colouring of some of the designations on the main map are confusingly similar, notably those for the Proposed District Centre, the District Centre boundary and the revised Physical Limits boundary. Also, the use of very heavy lines at the scale of the main map is unhelpful.

Notwithstanding these observations, thank you for the opportunity to have been consulted. The Town Council looks forward to receiving information on the further development of the Area Action Plan.

Summary:

Page 27, FPP4

Remove "and Candlet Road" from the first bullet point. Any business units for this site should be restricted to the land adjacent to the A14 Dock Spur only.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

AAP Preferred Options Consultation Response.pdf

O - 6807 - 3809 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

6807 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: N/A anonymous [3809] Agent: N/A

Full Text:

I would like to put my objections to building commercial business park and housing on Walton Green north. We need to keep are beautiful countryside not only for farming but are wildlife. Walton high road already struggles with traffic at peak times and building. There are plenty of empty pieces of land in town to build. Including St Andrews road where several building were demolished, the old Blockbuster and carpet shop now stood empty for several years, which I know are commercial at moment but could be changed to residential buildings as Feather's pub Walton high street was and be demolished and several new afford houses or flats built. Another site is by Felixstowe's station . Building permission was given for a supermarket several years ago but that is a stupid place for a supermarket as not only is the planned access for the delivery lorries not suitable but there is already a supermarket , Solar a few hundreds yards away and I can't see how if another supermarket was built there that both would survive and we would end up with either one or two huge empty building. Asda have now been given permission to be on the Haven site and we don't need two new supermarkets in town. So the land by Felixstowe train station would be much better to build housing on. Now we have Felixstowe Academy surely the land behind the old Deben high school could be built on and also the huge building on Sea Road which has been empty now 10 years + could be demolished and new flats with parking built. Yes we need some new housing but we need our countryside more. There are plenty of area in town we can build. One of the greatest things about living in Walton and Felixstowe is we have such beautiful countryside and coast within walking distant great for are nation health. And as the nation as a whole is being encourage to exercise more walking, and cycling which are both great and free . Our family for one enjoy are walks through our countryside, enjoying the views, looking for wildlife and fresh clean air. We need to protect what countryside we have left not only for us humans but more important wildlife. We have already lost enough over the last 30 years + . We also don't need a commercial business park built either . Let's protect our wonderful countryside. Don't built on any of it.

Summary:

I would like to put my objections to building commercial business park and housing on Walton Green north. We need to keep are beautiful countryside not only for farming but are wildlife. Walton high road already struggles with traffic at peak times and building. There are plenty of empty pieces of land in town to build. One of the greatest things about living in Walton and Felixstowe is we have such beautiful countryside and coast within walking distant great for are nations health.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6895 - 3844 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

6895 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: J Wood [3844] Agent: N/A

Full Text: The proposed new site is inaccessible to public transport for our disabled members, our site is a community asset, and

is on a bus rout, and has a crossing right outside our present site. We have a meeting for our disabled members every Tuesday morning for our blind members twice a month, we also have Mencap a few times each year. As you can see it

is my concern for the disabled and, as they will lose this community asset.

Summary: The proposed new site is inaccessible to public transport for our disabled members, our site is a community asset, and

is on a bus rout, and has a crossing right outside our present site. We have a meeting for our disabled members every Tuesday morning for our blind members twice a month, we also have Mencap a few times each year. As you can see it

is my concern for the disabled and, as they will lose this community asset.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6898 - 166 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

6898 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Mrs Carol Florey [166] Agent: N/A

Full Text: I object to the number of houses suggested for this 30 acre site especially if a portion of it is to be allocated to business

units, along with a through road and allocated green areas.

A 'buffer' was not deemed to be necessary for houses south of High Street so why here?

No maximum building height is mentioned but any building should be in keeping with property around it and residential

amenity should be considered.

Sewerage work would be imperative - the present system cannot cope

Appropriate infrastructure is not identified eg schools and doctors surgeries already overflowing

Summary: I object to the number of houses suggested for this 30 acre site especially if a portion of it is to be allocated to business

units, along with a through road and allocated green areas.

A 'buffer' was not deemed to be necessary for houses south of High Street so why here?

No maximum building height is mentioned but any building should be in keeping with property around it and residential

amenity should be considered.

Sewerage work would be imperative - the present system cannot cope

Appropriate infrastructure is not identified eg schools and doctors surgeries already overflowing

Change to Plan 1. A realistic transport assessment is crucial taking into account the Academy school traffic and the planned houses

south of the High Street and High Road 2. Sewerage work imperative

Sewerage work imperative
 Suggest that use of Treetops as a through road be clearly identified as unsuitable on the grounds of residential

amenity and maintaining residential status quo 4. Maximum building height to be stated.

5. Number of houses to be reduced

6. Infrastructure to be in place before houses built

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 6901 - 316 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

6901 Comment

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Mr William Bond [316] Agent: N/A

Full Text: I AM PARTICULARLY CONCERNED THAT THE SITUATION REGARDING THE RIFLE CLUB IS RESOLVED,

BEFORE ANY DEVELOPMENT TAKES PLACE ON THE NORTH WALTON SITE. EITHER FURTHER ASSISTANCE (FINANCIAL) SHOULD BE AVAILABLE FOR RELOCATION TO NEW SITE, OR ALTERNATIVE SOLUTIONS BE

INVESTIGATED THAT WOULD ALLOW CLUB TO REMAIN ON EXISTING SITE.
"THERE ARE WAYS IF ONLY TRINITY/BIDWELLS WOULD TALK TO US"

Summary: I AM PARTICULARLY CONCERNED THAT THE SITUATION REGARDING THE RIFLE CLUB IS RESOLVED,

BEFORE ANY DEVELOPMENT TAKES PLACE ON THE NORTH WALTON SITE. EITHER FURTHER ASSISTANCE

(FINANCIAL) SHOULD BE AVAILABLE FOR RELOCATION TO NEW SITE, OR ALTERNATIVE SOLUTIONS BE

INVESTIGATED THAT WOULD ALLOW CLUB TO REMAIN ON EXISTING SITE.
"THERE ARE WAYS IF ONLY TRINITY/BIDWELLS WOULD TALK TO US"

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6902 - 3778 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

6902 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: mr colin lockwood [3778] Agent: N/A

Full Text: TOTALLY UNSUITABLE FOR ROAD CONNECTIONS, TRIMLEY HIGH RD AND CANDLET RD ALREADY OVER

LOADED.

PRIME AGRICULTURAL LAND SHOULD NOT BE USED FOR DEVELOPMENT

Summary: TOTALLY UNSUITABLE FOR ROAD CONNECTIONS, TRIMLEY HIGH RD AND CANDLET RD ALREADY OVER

LOADED

PRIME AGRICULTURAL LAND SHOULD NOT BE USED FOR DEVELOPMENT

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6984 - 3871 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

6984 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Mr Ken Allen [3871] Agent: N/A

Full Text: I coach Visually Impaired People in shooting skills at this rifle club and know that other disabled people also gain skills

and confidence, not to mention enjoyment in learning to shoot.

This facility has been established at its present site for over 50 years and should be preserved. The small site is

occupies is not likely to be of use as anything else. It should be left where it is to continue its good work!

Summary: I coach Visually Impaired People in shooting skills at this rifle club and know that other disabled people also gain skills

and confidence, not to mention enjoyment in learning to shoot.

This facility has been established at its present site for over 50 years and should be preserved. The small site is

occupies is not likely to be of use as anything else. It should be left where it is to continue its good work!

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6995 - 3880 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

6995 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street. Felixstowe

N/A Respondent: East Suffolk Association for the Blind (Mr Mike Agent:

Deacon) [3880]

Full Text: Preferred Policy FPP4: Land North of Walton High Street Felixstowe

On behalf of the Felixstowe Branch of ESAB (East Suffolk Association for the Blind) I write to oppose the Preferred

Policy FPP4

I am a District Councillor and have declared a Local Non Pecuniary Interest on my register of interests form in respect of my position as chairperson of ESAB Felixstowe. The views submitted are for and on behalf of ESAB (Felixstowe) and

represent the views of the organisation.

The opposition of ESAB (Felixstowe) is based on the closure and re-location of the Felixstowe Rifle Club (see planning application C13/0967). Felixstowe Rifle Club has ranges that have been adapted for use by people with visual

impairments. ESAB (Felixstowe) has used the facility for 12 years regularly twice a month. Typically 15 of our members participate in these sessions. Several of our members enjoy the sport so much and have become proficient enough to join the Rifle Club formally which enables them to use the facility anytime that the club is open.

There is an annual shooting match between our members and the Blind Veterans UK (formally St Dustan's) of Brighton. The GB Paralympic shooting organising authority nationally have only two centres authorised and suitably equipped to assess the potential of future members of the GB squad, Felixstowe is one of them.

Crucially the current location of Felixstowe Rifle Club is situated on a major public transport route with a frequent bus service. There is also a very convenient pedestrian controlled crossing nearby. In contrast the proposed venue has no such public transport access and is located such that it would be virtually impossible for our members to reach it.

Felixstowe Rifle Club has ranges that have been adapted for use by people with visual impairments. ESAB (Felixstowe) Summary:

has used the facility for 12 years regularly twice a month. Typically 15 of our members participate in these sessions. Crucially the current location of Felixstowe Rifle Club is situated on a major public transport route with a frequent bus service. There is also a very convenient pedestrian controlled crossing nearby. In contrast the proposed venue has no such public transport access and is located such that it would be virtually impossible for our members to reach it.

Change to Plan

Legal? Sound? **Duty to Cooperate? Soundness Tests** Appear at exam?

Not Specified Not Specified Not Specified Not Specified None

O - 7002 - 3882 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7002 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Chris Garrod [3882] Agent: N/A

Full Text: I feel that Felixstowe Rifle Club should remain on its existing site.

The club has a very active group of people with disabilities both Visual and Physical, several of whom use public transport which

passes our entrance.

Furthermore, the club has been in its present location for many years with no disturbance or secondary effects on the local

community.

Summary: I feel that Felixstowe Rifle Club should remain on its existing site.

The club has a very active group of people with disabilities both Visual and Physical, several of whom use public transport which

passes our entrance.

Furthermore, the club has been in its present location for many years with no disturbance or secondary effects on the local

community.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7079 - 3892 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7079 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Margaret Morris [3892] Agent: N/A

Full Text: FPP1

I have concerns about Housing adjacent to the A14 at Walton- a suggested bund in a planning application would not be

sufficient to protect residents and there needs to be safeguards written into the document.

I also have concerns about air quality fir this land north of High Street Walton.

3.31 - there is no reference to affordable housing, despite saying in the introduction that the Council is looking for Housing for Everyone. SCDC need to make a firm commitment to affordable - housing - and stick to it for a change.

4.17 I agree about the Bridge Road site

5.08 The changes to business rates for small businesses referred to in the Chancellor's Autumn Statement means I am

worried about the viability of the small businesses in the Town Centre.

Summary: I have concerns about Housing adjacent to the A14 at Walton- a suggested bund in a planning application would not be

sufficient to protect residents and there needs to be safeguards written into the document.

I also have concerns about air quality fir this land north of High Street Walton.

3.31 - there is no reference to affordable housing, despite saying in the introduction that the Council is looking for Housing for Everyone. SCDC need to make a firm commitment to affordable - housing - and stick to it for a change.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7103 - 3314 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7103 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Lorna Adamson [3314] Agent: N/A

Full Text: Comments on the Felixstowe Peninsula Action Plan

FPAP 3.07 I welcome the aim to preserve as far as possible prime agricultural land for food production. FPAP 3.20 I welcome the statement that proposals for new residential development outside the physical limits boundaries will be strictly controlled in accordance with national planning policy and the strategy for the countryside as set out in Core Strategy policy SP29.

I welcome the statement that extending the boundaries further was considered inappropriate because this may lead to further development in locations which are not well related to the existing settlements, services and facilities and lead to new building encroaching into the countryside.

FPAP 3.26 to 3.38 Land north of Walton High Street I am concerned at the loss of prime grade 1 and 2 agricultural land with the proposals for this site when 3.07 states the aim to preserve to preserve prime agricultural land for food production. I am not clear what 'mitigation may offset the loss of greenfield land of Grade 1-2 Agricultural soil classification'. I am also concerned about the potential for very heavy traffic on the High Road opposite Felixstowe Academy. The High Road is the main route into Walton and Felixstowe used by many residents living in the Trimleys in order to avoid the Howlett Way sliproad onto the A14 with heavy lorries to the docks bearing down on local vehicles. There should be a transport assessment carried out on the implications for the High Road - particularly at peak times of the day.

FPAP 3.50 Site opposite the Hand in Hand pub in Trimley St Martin I would endorse the need for a transport assessment here too as 'access to this site must be onto High Road as this provides the most suitable access point for the development and would also require a transport assessment to be undertaken as part of any future application. In addition, there is 'the major negative environmental effect is due to loss of Grade 2 agricultural soils.' I should be interested to know what 'Scope exists to mitigate for this effect.'

FPAP Site 451c and 451d With my concerns about the implications of development for traffic congestion and danger for users on the High Road, I am very worried about the proposal for a minimum of 350 houses on this site. The SSAASP mentions only a transport assessment for Howlett Way. There is also the major negative environmental effect from the loss of Grade 2 agricultural soils and again I am unconvinced by the statement 'scope exists to mitigate for this effect'. There should at least by a transport assessment carried out on the implications for the High Road - particularly at peak times of the day.

The Old Poultry Farm - which the site 451c wraps around - is brownfield land and an eyesore. I cannot see anyone particularly wishing to live in houses which are built beside this derelict site.

FPAP Appendix 3

I welcome the decision to discount the sites in Trimley St Martin set out in this Appendix. However, I am very disappointed that sites 920, 928 and 726 have been left for consideration in 'The local plan review' when they so clearly in my view violate national planning policy and the strategy for the countryside as set out in Core Strategy policy SP29.

Summary:

I am concerned at the loss of prime grade 1 and 2 agricultural land with the proposals for this site when 3.07 states the aim to preserve to preserve prime agricultural land for food production. I am not clear what 'mitigation may offset the loss of greenfield land of Grade 1-2 Agricultural soil classification'. I am also concerned about the potential for very heavy traffic on the High Road opposite Felixstowe Academy. There should be a transport assessment carried out on the implications for the High Road - particularly at peak times of the day.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7139 - 744 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7139 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Historic England (Sir/ Madam) [744] Agent: N/A

Full Text: Re: Preferred Options Public Consultation (19th October - 30th November 2015)

Felixstowe Peninsula Area Action Plan

Thank you for your letter dated 15th October 2015 regarding the above consultation. We have had the opportunity to assess the letter and consultation documents and can offer the following. Please note we have provided comments on the Site Allocations and Area Specific Policies within a separate letter to you dated the same. This follows a previous consultation and our comments dated 25th February 2015.

In terms of our general comments:

Recent Guidance from Historic England

We have recently published guidance on the Historic Environment and Site Allocations. Where we have not made comment below some additional guidance on ensuring a positive strategy for the historic environment is secured within the Felixstowe Area Action Plan can be seen by following this link- http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/.

In terms of our site specific comments:

Housing Sites

FPP4: Land north of Walton High Street, Felixstowe (451g)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the possible impact on the setting of two Listed Buildings, Grade II* Listed Walton Hall and Grade II Listed 362 High Street. We highlighted that the principal elevation of Walton Hall faces north and overlooks site 451g. It was considered that development here would urbanise the setting of this important, highly designated heritage asset, resulting in harm to its significance. It was expressed that harm would also be caused to the Grade II lodge and we strongly advised that an alternative site was found for development, though it was thought that there may be scope for some limited development at the eastern end of this site. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. The policy does however highlight that the development will need to be sympathetic to the Listed Buildings found at Walton Hall and 362 High Street. Whilst this would go some way to allay our concerns we still recommend that whilst it is considered the site can take a level of development there would be a detrimental harm to the setting of the Listed Buildings if the whole site is developed. If the site is to remain in the plan we would advise that the western end of the site is left relatively undeveloped to help protect the setting and it is considered that this side of the site might lend itself to fulfil the Public Open Space requirement.

FFP5: Land north of Conway Close, Felixstowe (502e)

We welcome the acknowledgment of the Listed Buildings and the requirement that development will need to be sympathetic to the Listed Buildings within the policy. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FFP6: Land opposite Hand in Hand Public House, Trimley St Martin (451b)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of two Grade II Listed Buildings (the Hand in Hand public house and Nos 251 and 253 High Road). We highlighted that both these buildings are traditional vernacular structures that date back to the agrarian origins of the village, and their current proximity to open countryside contributes to their setting and significance. We therefore encouraged the Local Planning Authority to identify alternative sites if at all possible so that the setting of these two buildings might be protected. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. However, it is also acknowledged that the policy requires a village green to be included within the scheme. The village green is to front High Road in order to reduce the impact on the setting of the Hand in Hand public house and this is particularly welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP7: Land off Howlett Way, Trimley St Martin (451c and 451d)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of the two Grade II listed churches and the Grade II listed Old Rectory. Whilst it is acknowledged that the consideration of the setting of the rectory is included within the policy, and this is welcomed, we would advise that the setting of the churches is also included. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP8: Land off Thurmans Lane, Trimley St Mary (383f and 451f)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of Grade II Listed Building Mill Farmhouse. It is acknowledged that there is a requirement in the policy that the development will need to be sympathetic to the setting of the mill and this is welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

Town Centre

FFP14: Felixstowe Town Centre and FFP15: Retail Frontages

As outlined within our response to you dated 25th February 2015 it is considered these policies should cover

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

O - 7139 - 744 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7139 Object

Housing

Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

conservation and design issues. It is considered the policies should highlight the importance of retaining or restoring historic shopfront features both in terms of the positive contribution historic shopfronts make to the character of an area but also the economic benefit of providing traditional and bespoke shopping units to shopowners. A good example of how historic shopfronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a National success. The council have also seen a ripple effect of surrounding properties being restored. As well as including conservation and design issues within these policies the Council could consider additional advice within a Supplementary Planning Guide on Historic Shopfronts, especially given the importance and contribution the Historic shopping areas within the settlements of Suffolk make to the wider area.

District Centres

FPP17: District Centres

As above it is considered that this policy should cover conservation and design issues. It should highlight the contribution the Historic Environment makes to the economic success of district centres and seek to protect and enhance both the setting of historic assets and assets themselves.

Tourism and Sea Front Activities

We welcome the inclusion of a section which covers tourism and seafront activities. It is considered that point 6.03 on page 61 could also acknowledge and highlight the wider and more general positive contribution to Felixstowe that heritage tourism brings.

FFP18: Felixstowe Ferry and Golf Course, FFP19: Felixstowe Ferry Golf Club to Cobbolds Point, FPP20: Cobbolds Point to Spa, FPP21: Spa to Martello Park and FFP22 Martello Park to Landguard We welcome and support the acknowledgement and required protection of the historic qualities of these sections of the coast

FPP23: Car Parking

We welcome the 'high quality of design' requirement relating to replacement car parking at point 6.36 on page 72. It is considered that this requirement should be included within the policy itself to give it more weight in decision making.

The Environment

We welcome the inclusion of a section on the Historic Environment which sits separately from landscape and ecological elements. We also welcome the section on Locally Listed Buildings and Features. It is considered the Historic Environment section should also highlight Felixstowe's archaeology.

It is acknowledged that no individual policies on the Historic Environment are proposed for the Area Action Plan itself, relying instead on saved policies within the Core Strategy and the National Planning Policy Framework. The Core Strategy does not have a specific historic environment policy, with certain aspects covered in other policies such as SP15 (Landscape and Townscape) and DM21 (Design Aesthetics) and policies for specific settlements. It is considered that there is a lack of a clear strategy relating to the Historic Environment, relating to local issues, at present, and we would encourage greater clarity. This should set out the Council's approach to the management of designated and non-designated heritage assets (including archaeology) and how issues such as heritage at risk will be tackled. It is considered that a Historic Environment Policy could be locally specific to cover the Felixstowe Peninsula Area Action Plan.

In addition to the above it is acknowledged that the issue of Felixstowe South Conservation Area At Risk is not being covered by the Plan. We therefore reiterate our previous comments as follows, it would be advantageous if the Area Action Plan identified specific policies to help remove it from the register. These might include utilising the conservation area appraisal to identify locally important buildings that contribute positively to the conservation area, and introduction Article 4 directives to protect such buildings. There may also be sites which are considered negative contributors to the character and appearance of the conservation area and the preparation of development briefs for such sites might help bring forward positive redevelopment. The conservation area survey identified the loss of architectural detail as a significant problem, and consideration might therefore be given to applying to the Heritage Lottery Fund for a Townscape Heritage programme for the area, or a smaller partnership scheme with Historic England to reinstate lost architectural details on key buildings. We would therefore still recommend the inclusion of a policy which tackles the issues at Felixstowe South Conservation Area.

FPP26: Areas to be Protected from Development

In our response to you dated 25th February 2015 we expressed concerns regard the inclusion of all the sites in Trimley St Martin which would in effect surround a number of Listed Buildings including Grade II listed churches, the Grade II listed Old Rectory and Grade II Listed Building Mill Farmhouse. We recommended the inclusion of an area to be protected from development which would protect the remaining green wedge and as a result protect the setting of a number of Listed Buildings. It is acknowledged that the green wedge within Trimley St Martin is proposed to be included within the Areas to be Protected from Development and this is particularly welcomed and supported.

FPP27: Historic Park and Garden

We welcome the inclusion and the content of this policy.

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O - 7139 - 744 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7139 Object

Housing

Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

Other Issues

Coastal Change Management and Areas of Flooding

We welcome the inclusion of this section. It is considered this section should also contain a paragraph on issues and opportunities of climate change and flooding relating to the Historic Environment. Further guidance on flooding issues can be found here- http://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/.

For information and for further policy consultation please note our new consultation email address for the East of England, eastplanningpolicy@HistoricEngland.org.uk.

Summary:

We previously highlighted that the principal elevation of Walton Hall overlooks site 451g. Development here would urbanise the setting of this important heritage asset, resulting in harm to its significance. Harm would also be caused to the Grade II lodge. We advised that an alternative site was found for development; there may be scope for some limited development at the eastern end of this site. If the site is to remain in the plan we advise that the western end is left relatively undeveloped to help protect the setting and might lend itself to fulfil the Public Open Space requirement.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7158 - 3899 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7158 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Mr Martin Atkinson [3899] Agent: N/A

Full Text:

The Felixstowe Rifle Club has a very wide age range of members of all abilities. Including an extremely active group of people with disabilities both Visual and Physical. Shooting for the blind being just one of the disciplines.

Since a number of participants rely on public transport, they are able to access the facilities as a very good bus service passes the Felixstowe Rifle Club entrance.

The present Rifle Range location is ideally placed for a number of very good reasons.

- * It is adjacent to a good road with footpath access and crossing facilities.
- * It is on a bus route.
- * It provides an extension to the wildlife corridor alongside the Dock Road embankment.
- * It provides a buffer between the Dock Road and any further site development in terms of noise and air pollution.
- * It is a self contained site with purpose built facilities and adequate off road parking.
- * Has a separate Sport England Award Range with facilities for the visually and mentally impaired.
- * Improvements to the facility can be carried out at relatively low cost and with little or no visual change.
- * Cost saving to all parties compared to developing and moving to a new site that may not provide all of the current facilities.
- * Provides social participation for less advantaged members of the community in the club room.
- * To leave the land suggested as an alternative site for a more suitable alternative use.

The Felixstowe Rifle Club has a long on going historical link to the local community and caters for many shooting disciplines at a competitive level. There are annual competitions with a partner club in Wesel, Germany and the club was used as a training venue for a member of the Uzbekistan Olympic team in 2012.

The Felixstowe Rifle Club is clearly a valuable Community Asset.

Members have equally welcomed new members and those with disabilities. Members have contributed to provide specialist equipment to enable disadvantaged people to participate in a sport that can be safely engaged in by people of all ages and abilities. Club instructors have also facilitated in the training of young people to qualify for the Duke of Edinburgh Awards.

It is also on record that many people who have felt excluded by society through disabilities have discovered that there is something that they can do, and do well with practice. Target shooting provides a degree of social inclusion that in turn encourages well being and confidence in men and women, girls and boys of all ages and disabilities.

Reference: MENCA, ESAB, IFIT and the Suffolk Disability Organiser.

In order

- * to meet the requirements, needs and aspirations of a cohesive community,
- * to make provision for a sustainable and cost effective solution, and
- * to support a viable Community Asset,

would suggest that Felixstowe Rifle Club should remain in situ.

The alternative, given the options to date, would appear to minimise the value of the Felixstowe Rifle Club to the community, by placing it in a more remote and less accessible location.

I sincerely hope that Suffolk Coastal District Council, who have a duty of care, will consider the points raised and support the premiss that the Felixstowe Rifle Club should remain in its present location as a Community Asset.

Suffolk Coastal...where quality of life counts

Summary:

The Felixstowe Rifle Club is clearly a valuable Community Asset.

Members have equally welcomed new members and those with disabilities. Members have contributed to provide specialist equipment to enable disadvantaged people to participate in a sport that can be safely engaged in by people of all ages and abilities. Club instructors have also facilitated in the training of young people to qualify for the Duke of Edinburgh Awards.

It is also on record that many people who have felt excluded by society through disabilities have discovered that there is something that they can do, and do well with practice.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

O - 7160 - 3901 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7160 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Clare Burman [3901] Agent: N/A

Full Text: I lost my sight many years ago and have been taking advantage of the excellent facilities offered by the rifle club to

visually impaired shooters for over 7 years now. Home to the largest VI club in the UK, visiting the rifle club regularly helped me on the road to recovery and acceptance of my disability. Taking part in sonic rifle shooting gave me back a sense of belief in myself and the confidence that I had lost along with my loss of vision. I became the national VI

shooting champion in 2010 and also that year, was named Suffolk Coastal Disabled Sports Personality.

As a blind person, making my way to venues can be very challenging and in some cases, impossible independently and safely. The fact that the rifle club is on a direct bus route and close to the train station has been a godsend to me and is crucial to my being able to shoot at the club. I am therefore very concerned at the proposed relocation of the club and worried that if the move goes ahead, the new location will not be so accessible and safe to me and the countless other

disabled shooters that use Felixstowe Rifle Club.

Recently, I have set up iFit Suffolk; an organisation that encourages blind and partially sighted people throughout Suffolk to take part in regular sporting and fitness activities. The shooters that attend our sessions with the club also

share my concerns.

Summary: As a blind person, making my way to venues can be very challenging and in some cases, impossible independently and safely. The fact that the rifle club is on a direct bus route and close to the train station has been a godsend to me and is

crucial to my being able to shoot at the club. I am therefore very concerned at the proposed relocation of the club and worried that if the move goes ahead, the new location will not be so accessible and safe to me and the countless other

disabled shooters that use Felixstowe Rifle Club.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7162 - 3903 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7162 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Mr Thomas Martin [3903] Agent: N/A

Full Text: I feel Felixstowe rifle club is a community asset It provides facilities to the visually impaired, disabled and able bodied

people to partake in a disciplined sport for recreation or competition standards. The club site is on a main transport route with a regular bus service and a crossing near the entrance providing safe crossing to all. The club holds regular

open days for anyone interested to see what the club is about including disabled days.

Summary: I feel Felixstowe rifle club is a community asset It provides facilities to the visually impaired, disabled and able bodied

people to partake in a disciplined sport for recreation or competition standards. The club site is on a main transport route with a regular bus service and a crossing near the entrance providing safe crossing to all. The club holds regular

open days for anyone interested to see what the club is about including disabled days.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7163 - 3904 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7163 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Mr Mark Fitchett [3904] Agent: N/A

Full Text: I am against the club being moved because i think it would be suicidal for the club as the blind and disabled who

would have no public transport or access to the new site and because of the extortionate cost of the build which has

been estimated to be about £1 million there is no way that a club can raise this money.

Summary: I am against the club being moved because i think it would be suicidal for the club as the blind and disabled who

would have no public transport or access to the new site and because of the extortionate cost of the build which has

been estimated to be about £1 million there is no way that a club can raise this money.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7165 - 505 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7165 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Save Felixstowe Countryside (Mr John Johnston) Agent: N/A

[505]

Full Text: SAVE FELIXSTOWE COUNTRYSIDE INPUT TO PREFERRED OPTIONS CONSULTATION

- November 2015

Do you think that the Council has selected the most appropriate preferred options?

No. Save Felixstowe Countryside (SFC) cannot support the irreversible loss of grade 1 & 2 agricultural land - much needed for food production as global warming accelerates in forthcoming years. Nor can we support the proposed gradual erosion of what is probably the last country lane in Felixstowe, much loved & enjoyed by Felixstowe residents for walking, cycling & horse riding.

Can you suggest a more suitable approach than that outlined?

The fundamental driver for housing is to meet Govenment targets for housing in order to stimulate the economy. Housing is not for local needs but for predicted migrants to the area. Felixstowe is the wrong location for such high growth given;

* Felixstowe employment profile is distorted by a single massive employer whose employees are used to long distance travel. The many redundancies in Felixstowe go unannounced and silently disregarded whilst what little employment is "mooted" is heralded as "justification" for housing whether or not it comes to fuiting. Felixstowe is clearly "someones" preferred location. Not the residents.

* Demand for Felixstowe housing is the LEAST in the District evidenced by the fact it REMAIN the cheapest location in the District for housing. Housing is expensive all over the District in part due to individuals investing in & renting multiple properties - take a look at the Register of Councillors' interests of Suffolk Coastal Councillors, "Interest 5" available at; https://waveney.firmstep.com/default.aspx/RenderForm/?F.Name=jNzibiXCCa3&HideToolbar=1&CID=1&TAPC=147

* Felixstowe IS at the end on a peninsula, naturally constrained, and transport links shared with ever increasing port traffic.

* The promised rail passing place, an outcome from a Planning Enquiry as a pre-requisite for dock expansion has not materialised. Expansion is in place, no rail passing place. Imports are significantly accelerating and with it Lorry traffic.

* Nett commuting during the morning rush hour is outward from Felixstowe - more houses = more commuters. When there is an accident on the Felixstowe stretch of the A14 - it is gridlock!

* Traffic up & down the Felixstowe peninsula has increased significantly and commuters from Felixstowe contend with Lorries which pull out at the last minute and at a moments notice trying to overtake yet hardly able to do so.

* The Seven Hills interchange backs up to the A14 every morning from at least 7:30am till 9.00am for Felixstowe commuters wishing to travel north on the A12 from the A14. For traffic heading to the north of the District, Trimley St Martin will become a "rat-run" to avoid congestion, causing even more chaos outside Trimley St Martin school in the morning.

* Expansion at Martlesham will exacerbate current problems at the Seven Hills interchange worse. Flows from Martlesham joining the westbound carriageway to travel over the Orwell Bridge, already beyond capacity, create a continuous flow preventing traffic from Felixstowe travelling to Martlesham or beyond.

* Increasing the housing at Felixstowe will increase the differential between house prices in Felixstowe and the rest of the District causing a corresponding increase in commuters from Felixstowe prepared to travel to take advantage of the cheapest properties in the District.

* Getting an advance appointment at the GP is no longer possible since the new Health Centre was built. Only "on the day" appointments with a doctor may be booked if you enter the call queue at or close to 8am. After this, you need to call the following day. Whilst the mitigation of "we'll get more Doctors" - can they be got? We feel sure the Surgery would get the much needed Doctors today to relieve todays problems if they could so any mitigation promise of "we'll get more Doctors" cannot be delivered.

* Building more houses to support more migrants to commute from Felixstowe will only make matters worse. Strategic growth at Felixstowe is the wrong solution.

Are there any other alternative options that need to be considered?

The policy of restraint at Felixstowe should continue with strategic development encouraged to the North of the district where land is abundant and population densities lower.

Bentwaters is planned to be developed as a 380 Hectare employment site. This new development is larger than the CURRENT Felixstowe port which amounts to 340 Hectares. However, there doesn't appear to be any plan to provide housing which might be expected from efficient use of the site.

Do you agree with the findings of the sustainability appraisal assessments undertaken?

Do you have any other comments on the preferred options documents? Felixstowe Preferred Options document.

Land North of High Street, Walton, Felixstowe

Site Area: 12.00ha SHLAA Reference: 451g also referenced as:

S4.5 - Land North of High Street Walton - Employment site

The area is grade 1 agricultural land and construction on this site would result in the irreversible loss of the best and most versatile agricultural land.

It also provides clear visual separation between Walton & Trimley St Mary. A simple road does NOT provide such a visual separation evidenced by the fact that today Walton High Road does not provide a strong separation - Trimley St Mary exists on both sides of Walton High Road, not just on one side.

O - 7165 - 505 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7165 Object

Housing

Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

Lane North of Conway Close, Felixstowe

Site Area: 3.38ha SHLAA reference: 502e

The area is grade 1 agricultural land and construction on this site would result in the irreversible loss of the best and most versatile agricultural land.

Conway Close, Swallow Close and Upperfield Drive currently create a firm edge of the built up area of Old Felixstowe with the countryside to the north and must be retained, in the same way as SP26 protects Woodbridge.

The land constituting SHLAA reference 502e provides a visual separation between modern estate housing and the small country cottage developments on Gulpher Road & the country element of Ferry Road as well as the already identified Park Farm Cottages.

The site to the east has already fallen with significant loss of Countryside in the form of "site 166b" which should never have been allowed. If development of site 502e is permitted, development would cross the hard edge of Ferry Road and risk the gradual creep of housing across North Felixstowe eroding the tranquil nature of Gulpher Road, presently enjoyed by cyclists, horse riders & walkers alike. Perhaps that's someone's secret plan? This is contrary to the wishes of Felixstowe residents and has been the subject of public outcry in the past.

Land North of High Street Walton 4.25

Are the policy requirements justified and do they meet the needs of the local community?

The housing requiremets are not for the local community - they are for projected migrants and, as seen by the Felixstowe South Sea-front developments, "buy-to-let" properties.

They do not meet the needs of the local community as they are impacting the North Felixstowe landscape - an area identified by David Lock as what makes Felixstowe special and should be protected.

What is proposed is contrary to the needs & wants of Felixstowe residents.

Summary:

The area is grade 1 agricultural land and construction on this site would result in the irreversible loss of the best and most versatile agricultural land.

It also provides clear visual separation between Walton & Trimley St Mary. A simple road does NOT provide such a visual separation evidenced by the fact that today Walton High Road does not provide a strong separation - Trimley St Mary exists on both sides of Walton High Road, not just on one side.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7212 - 3921 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7212 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Mr Reg Horne [3921] Agent: N/A

Full Text: Land North of High Street, Walton, Felixstowe.

Comments pertaining to Felixstowe Rifle Club currently located at

the western end of the above adjacent to the A14.

It is my opinion that the Felixstowe Rifle club should be retained on the existing site for the following reasons:-

* To do so would enable the planned housing development to proceed immediately (rather than 2019 as envisaged) and give a much needed boost to the local housing supply NOW.

* There are currently NO noise and safety issues from the existing ranges. There is far more noise generated by the A14. By locating the proposed commercial development to the east of the range (i.e. between the existing club site and proposed new housing would enhance the separation for security and noise puropses.

* There is good access to the existing club site with a regular bus service along the High Road. The proposed move to a new site on the Docks would limit access to car transport only and necessitate driving through a dangerous environment where heavy vehicles are maneuvering.
* Felixstowe Rifle Club is a hugely important asset for shooting by the disabled in the region and has extensive facilities for visually-impaired and blind shooters. Relocating to the docks with the attendant access

and safety issues would severely curtail this facility.

* Funding for the move of the club site is a major issue. The club has already recently received a lottery grant to build an air weapon range which is used extensively to train disabled and blind athletes.

Summary: The Felixstowe Rifle club should be retained on the existing site.

There are currently NO noise and safety issues from the existing ranges.

There is more noise generated by the A14. By locating the proposed commercial development to the east of the range

and proposed new housing would enhance the separation for security and noise puropses.

There is good access to the existing club site with a regular bus service along the High Road. The proposed move to a new site would limit access to car transport only and necessitate driving through a dangerous environment where heavy

vehicles are maneuvering.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7241 - 3924 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7241 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Mr Paul Cuttriss [3924] Agent: N/A

Full Text: I would like to point out that the option for keeping the rifle club in place seem to have been dropped without any

reasoning being given. Offering a first rate sporting facility used by many disabled as well as able members of the local

community it is surprising to me that the option has been dropped without justification.

Given that the members of the club voluntarily provide time and energy to new and established sporting shooters it

surprises me that the council wish to put additional hurdles in the way of such community spirited activity.

What would it take to keep the club, its facilities, and its access to the wider community in the same location? Where is the analysis? It strikes me that this is a classic case of identifying a problem whilst providing a premade solution which suits only a small subset of the stakeholders, none of whom (I suspect) make use of the facility currently, or will make use of the facility in the future wherever it is located. As a public consultation it is not unreasonable to expect that the 'no

move' option is fully investigated and taken into account.

Summary: What would it take to keep the club, its facilities, and its access to the wider community in the same location? Where is

the analysis? It strikes me that this is a classic case of identifying a problem whilst providing a premade solution which suits only a small subset of the stakeholders, none of whom (I suspect) make use of the facility currently, or will make use of the facility in the future wherever it is located. As a public consultation it is not unreasonable to expect that the 'no

move' option is fully investigated and taken into account.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

S - 7249 - 2966 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7249 Support

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Sport England (Mr Philip Raiswell) [2966] Agent: N/A

Full Text: Sport England supports the reference to the need to relocate the Felixstowe Rifle Club from this site, and that the club should be relocated prior to any development commencing on site, in order to ensure continuity of provision for the club.

It is important that any replacement facility is of equivalent or greater quantity and quality in order to ensure the club maintains the level of facility it currently enjoys. The location of the new facility also needs to meet the needs of the

current users of the club.

Sport England consider that the following sentence should be included within this policy or the supporting text:

"The replacement rifle club facility should be the equivalent (or greater) in terms of quantity, quality and accessibility in comparison to the existing facility and should be provided in a location that is suitable to meet the needs of existing

users of the club, prior to the loss of the existing facility".

Summary: Sport England supports the reference to the need to relocate the Felixstowe Rifle Club from this site, and that the club should be relocated prior to any development commencing on site, in order to ensure continuity of provision for the club.

It is important that any replacement facility is of equivalent or greater quantity and quality in order to ensure the club maintains the level of facility it currently enjoys. The location of the new facility also needs to meet the needs of the

current users of the club.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

O - 7260 - 3934 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7260 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street. Felixstowe

Respondent: Mr & Mrs Williams [3934] N/A Agent:

Preferred Options Public Consultation Response form **Full Text:**

*□Do you think that the Council has selected the most appropriate preferred options?

- * Are the policy requirements justified and do they meet the needs of the local community?
- * Can you suggest a more suitable approach than that outlined?
- Are there any other alternative options that need to be considered?
- * Do you agree with the findings of the sustainability appraisal assessments undertaken?
- * Do you have any other comments on the preferred options documents?

Please indicate to which document your comments relate to?

Felixstowe Peninsula Area Action Plan

*□Do you think that the Council has selected the most appropriate preferred options? In short, sorry, but No...

Although one or two small scale sites within the town and Thurman's lane (ref 383f &451f)would seem to be logical extensions of existing past development which, with suitable precautions discussed later, could be seen as acceptable use of land, the three preferred options for the Trimley villages and Walton will fundamentally change their characters.

There are several views, (Vistas if you like) clearly seen as you walk or drive around the area, that positively 'define' the demarcation of these three distinct communities.

These demarcation, `vistas, ` can be seen, from the high road, the A14, or both.

If the preferred options, shown are used, then these demarcations and vistas will be lost forever, and a homogenised sprawl, from the sea, to the very edge of the Trimley's will be inevitable.

With further likely expansion taking place during the next stage (2027) there is a high probability that any remaining gaps will be 'filled in,' as the precedent will have then been established.

I have indicated these vital sightlines on the modified map at the end, along with possible alternative and equivalent sites I refer to the preferred options (PO)

- 1) for land off Howlett way ref 451c &451d
- 2) land North of High Street, Walton ref 451g
- 3) land opposite Hand in Hand public house ref 451b
- 4) land North of Conway close ref 502e

the SE view from Howlett way looking towards Felixstowe, across agricultural land gives a clear separation, from the substantially developed estates on the other side of this road, looking NW.

This is further reinforced by the view SW across to the Orwell, Albeit, at this stage, outside the red boundaries but in 2027, that too, could change?

The ongoing `Mushroom farm` development, has happily not significantly spoiled this perception of open countryside. This PO area, surrounded by footpaths, is extensively used by local residents of both communities, for horse riding, dog walking, and rambling, precisely 'because', the area, is, undeveloped.

Substantial bird and wildlife thrives within the area and is a valued resource for enjoyment.

A similar area could be produced, if the boundaries were extended north, to the other side of the A14 (shown on modified map - see attached document) that would prevent coalescence along the high road and reduce traffic impact, along the high road substantially, as easy access to A14 is possible.

2) Land North of High Street, Walton ref 451g

The wide demarcation of Walton and Trimley St Mary, is clearly seen and felt, when looking north from the high road, but hardly noticeable (due to banking), when looking South from the A14/A15d.

If this PO is used, Walton will simply merge into one with Trimley St Mary..... Especially as it is opposite an existing, approved planning application for a large development, the result ... Horrible!

However along the N boundary a smaller 'strip' development could, with good tree screening, and substantial setback, still not affect this natural gap too profoundly, giving say 200 -300 homes?

Again the land north, on the other side of the A14 would give a similar area and have easy access onto the roundabout,

still leaving good vistas from the road as shown on my modified map [see attached document].

3) Land opposite Hand in Hand public house ref 451b

The spectacular views, looking South across the country side from the` Hand in hand` area, will be destroyed even if only a single frontage was permitted, and of more concern 'allow' an entirely feasible, further expansion to the railway in 2027, once the excursion across the high road is established.

Although fortunately in this case, it would not 'link' two separate communities, just extend one.

However, if the area NE, and opposite Goslings farm were to be used, a similar area with good access would be available, without extending the extent of the village inordinately?

4) Land North of Conway close ref 502e

The other preferred option north of Conway close, looks innocent enough, until again, it is realised that adjacent land to the East, has already been granted planning permission, so the `white` area is somewhat misleading, as that

O - 7260 - 3934 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7260 Object

Housing

Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

development has already removed the view for the existing residents.

But it use would not appear to coalesce any discreet areas, as 1) and 2) do, so like 3) is mainly the expansion of an existing community.

The two `orange` areas of no permitted development, are certainly needed.(and appreciated)

Of concern however, is once the preferred options are established, it takes no great stretch of imagination to surmise that these two areas of `no development` will be the next to be `filled in` when the AAP is reassessed in 2027. If that were to take place, any pretext of individual villages and communities would then be farcical.

If alternative options could be chosen, either as suggested or elsewhere by yourselves, it would be far less likely that everything could be amalgamated later.

- * Are the policy requirements justified and do they meet the needs of the local community?
- * Can you suggest a more suitable approach than that outlined?
- * Are there any other alternative options that need to be considered?
- * Do you agree with the findings of the sustainability appraisal assessments undertaken?
- * Do you have any other comments on the preferred options documents?

The other questions posed above require, I feel, a slightly different approach and response.

I have read through countless documents, counter arguments and counter proposals, about the need for this many homes, employment, infrastructure etc, from 2009 until 2012 when the basic framework was established by the government/local government.

These discussions were far more eloquently expressed by the S.T.A.G (Save Trimley Against Growth) and N.A.N.T. (No Adastral New Town) representations, than I could possibly achieve, and yet failed to modify the `official` stance.

Therefore I feel the above battles have been fought and lost long ago, and now we are at the `Damage limitation` stage of the proceedings, although hopefully this will nonetheless be productive.

Similarly the sustainability assessments, apart from being largely unfathomable, use criteria that will always be subjective, and can be `adjusted` to suit the needs of the chosen decision.

These 'battles' have likewise, been argued over and lost long ago.

Finally, It would be naive, not to perceive the hand of Trinity College in all of this, especially since their `Vision` of `their` land was published a few years back, and their `influence` when attempting to realise the maximum return for the land, with no real empathy for everyone affected.

This at least leaves us with at least the possibility of `tinkering` with the preferred options, using yourselves, as our `voice` and `buffer` to make these decisions slightly more `palatable` to all of us who `will` be affected.

Therefore my next section will be on those preferred options but here is my take on the areas which may affect less people, but the land may not be that (cynically) chosen by Trinity College.......

[see attached document]

Site Allocations and Area Specific Policies

* Do you have any other comments on the preferred options documents?

As mentioned under my comments on the `Felixstowe Peninsula Area Action Plan`, I am assuming those options, will now likely go ahead regardless, and we are in a sort of `damage limitation` stage?

The preferred options for land off Howlett way ref 451c &451d

I know well the cliché "Not in my backyard" but in this instance it `IS` very much in our backyard, and obviously we/all, the existing tenants who are affected, have a vested interest, especially as we have `in` vested` considerable money and time to live here, and for all the qualities of life, it provides.

Equally, for all my working life, my career was in the building industry, including design and planning, before finally teaching it to HNC level. Therefore I do know, that a well thought out development, can work, and work well, and executed sensitively, need not unduly destroy an area.

So what were the reasons we chose to live here, and what features need to be protected, so that many more can share and enjoy this resource, should they soon live here, with ourselves...?

Well the area where we live has some wonderful and surprising features, which make it, just what it is... Simply put, it is pure Countryside.....

Entering from the high road, and within barely 10m of walking down Thurmans, or Church lane, you immediately disappear into an archetypical `English` setting, unspoilt in a hundred years as evidenced by photos. Leaves and mud on the road greet you as you walk down. The bustle and noise fade rapidly away, and then you emerge into a 100 acre field where fox and rabbits play.

A rich variety of birds sing in the foliage and crops. You give a greeting to a horse and rider, then a walker, for there are many.. Traffic although near, sounds distant, and fails to spoil the setting.., you can enjoy the big skies, with its sunrises and sunsets, or If you chose `Dark` starry nights, with owls, and fox's cries, and distant lights through the rustling trees......,

O - 7260 - 3934 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7260 Object

Housing

Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

All this, within the boundaries, of three busy roads. A true haven of peace within....

Any future development should endeavour to preserve all of this, especially for the existing tenants, and by incorporating such features, it would surely benefit any new dwellers life too, even if only at its peripheries, for then, they too, could walk with ease into this time warp or jet off down the A14 to town as is their choice, as we do.

There are also two, one hundred year old oaks in the centre that do not appear to have TPOs on them, but would surely be an asset within an open area for the development?

Likewise, a 1940s WW2 `pillbox` remains that should be preserved for posterity, and could easily become a feature within a development, either as a viewing platform (it has steps to a walled roof as it was also an anti aircraft position) or like the control tower at Martlesham Heath, a heritage site with information displays and focus of a park area.

My modified map [see attached document] shows some ideas that could help achieve this, but the simple principals are, to shield old from new, by leaving a broad band of untouched land (say 15m) around the boundaries with a screening of trees, that would preserve countryside views from both sides, and leave all the above, for all to enjoy.... Oh, And soft street lighting PLEASE, for preserving the dark night skies...Most planners, forget that, important feature of the `countryside`

It is paramount (and very much appreciated) that both Church lane, and Thurman's lane, are to be classified as `protected` lanes, and not to be used for access, to any new developments.

These peaceful routes provide part of that countryside experience. Please, cast this decision irrevocably in Stone. Any increase in (vehicle) traffic would destroy them.... Walkers and cyclists welcome...

The orange area to be protected from any developments is also vital to preserving this encircled haven of our countryside, so easily accessible from both Trimley villages.

It will also maintain that important historical separation of them.

Finally, the protected area should, provide an alternative home for the displaced, birds and wildlife, especially if several dead trees are replaced and give that haven of tranquillity for them within, for all of us to enjoy.

Thank you for protecting it, But again, please cast it in stone for all perpetuity, as it is only too easy to `fill it in later`, with the loss of all of the above.

[see atached document for revised maps of following:]

Land off Howlett way ref 451c &451d Land south of Thurmans Lane Ref 383f & 451f

This development, like Howlett way above, will affect existing tenants on three side. But with similar peripheral treatment of screening trees and scrub type band, will again separate both new and old from both directions.

Not allowing Thurmans lane to be used for access will preserve the `haven` of timeless countryside within the orange protected zone for both communities and indeed forms a circular route for both Trimley's

Land North of High Street, Walton Ref 451g

This area provides a clear division between Walton and Trimley St Mary, when looking North from the high road, but barely visible from the A14 /A15b

As this must also be taken in conjunction with the approved development opposite behind Walton hall, it would seem imperative to keep any development screened from the high road.

The old stables and Dutch house, will help this illusion, but need to be extended along the entire High Road frontage, with a decent `set back` to a solid new tree line.

And now to another 'vested interest....

The need to have the rifle club relocated before any development can continue (Para 3.27)

Could easily be made redundant, if the club could remain where it is. The club has no desire to move.

It would also provide the buffer mentioned in Para 3.29 and is a natural visual break along with the old stables for demarcation of the areas

Any possible noise issues could be solved with banking and/or trees as with the accepted C13/0967 planning application for elsewhere

For the developer, the small loss of building land would be offset by the ability to start work forthwith. The club has a strong affiliation with Mencap, RNIB and national sports bodies, a real asset to the local populace, that could easily disappear if evicted, as we are never likely to raise enough money to do so..

[see atached document for revised map of following:]

Land North of High Street, Walton Ref 451g

Sunday market site sea Rd ref 1011c

O - 7260 - 3934 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7260 Object

Housing

Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

Although not part of the argument for preserving historic `vistas`(indeed it was once a building)

the choice to develop the Sunday market will deprive the town of one of its significant venues, for tourism, and used by hundreds of local and outside visitors.

The surrounding retailers will undoubtedly lose a significant amount of passing trade and helps keep this area `alive` and clearly part of the tourism area (Para 6.22)

I can find no mention of a similar, alternative site.

[see atached document for photographs of following:]

Havens of peace within Land off Howlett way ref 451c &451d Looking due south from drain and the old Rectory Northern boundary Possible viewing point on 1940s pillbox and the old oaks looking North End of Church lane looking North..wildlife & tranquillity reign within three busy roads

NB unploughed borders are the suggested 15mtr 'No man's land Buffer zones

Summary: The need to have the rifle club relocated before any development can continue (Para 3.27)

Could easily be made redundant, if the club could remain where it is. The club has no desire to move.

It would also provide the buffer mentioned in Para 3.29 and is a natural visual break along with the old stables for

demarcation of the areas

Any possible noise issues could be solved with banking and/or trees as with the accepted C13/0967 planning

application for elsewhere

For the developer, the small loss of building land would be offset by the ability to start work forthwith.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

Preferred Options Public Consultation Response form.pdf

C - 7271 - 348 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7271 Comment

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Trinity College Cambridge [348] Agent: Bidwells (Laura Hunter) [3941]

Full Text:

RE: Felixstowe Area Action Plan - Preferred Options Consultation Representations submitted by Trinity College Cambridge in respect of land north of Walton High Street, Walton, Felixstowe

Client: Trinity College, Cambridge

I write in response to the above consultation to submit representations on behalf of my client, Trinity College Cambridge, in respect of the draft allocation of Preferred Policy FPP4 - land north of Walton High Street, Felixstowe.

Preferred Policy FPP4 - Land North of High Street, Walton, Felixstowe

Trinity College supports the proposed allocation of the above site for residential development.

The allocation of the site will make an important contribution towards the pressing need for new housing and the Council's commitment to the delivery of at least 1,760 new dwellings in Felixstowe, Walton and the Trimleys between 2010 and 2027, as set out in the adopted Core Strategy.

The Core Strategy acknowledges that the growth of jobs in the area, driven by expansion of the Port, means that employment is now out of balance with the availability of housing. As a result, more of the new jobs are being taken up by people who are not able to find a home in Felixstowe, even if they would like one. This had led to an unsustainable increase of in-commuting from other towns on a daily basis. In addition, the population in the area is increasing at the same time as average house-hold sizes are falling, further increasing the need for housing. The number and type of new homes provided in recent years has not matched this increase in demand. Addressing these issues must be a priority for the Council through the AAP and my client will be supportive in helping it to do so.

The importance of boosting housing supply in Felixstowe is reaffirmed by the Council's commitment to pursuing an early review of the Core Strategy's strategic policies to address objectively assessed housing needs, which are higher than the levels of growth currently being planned for. More sites are likely to be required to come forward on the peninsula over and above those proposed for allocation in the AAP to meet those needs. It is therefore critical to prioritise the delivery of housing.

This site is one of a number identified by the Council as being suitable for development in the Strategic Housing Land Availability Assessment (SHLAA, 2014). My client supports the SHLAA's conclusion that the site is deliverable, being suitable, available and achievable for development within five years.

The suitability of the site for housing is reaffirmed by its sustainability. The Interim Sustainability Appraisal supporting the AAP consultation identifies that it is one of the most sustainable on the peninsula, scoring particularly well in terms of social effects by providing access to a wide range of key services including employment, health and education. This is no surprise, for the following reasons:

- The site is located opposite Felixstowe Academy and within walking distance of a number of primary and pre-school facilities and the wide range of shops and services and facilities available on Walton High Street.
- It is adjacent to the main bus route (Walton High Street) connecting Felixstowe, Walton and the Trimleys with neighbouring centres and within walking distance of both Felixstowe and Trimley railway stations.
- Of those available for development, the site is one of the closest to the Port of Felixstowe and its other employment areas, making it ideally placed to help the Council to reverse unsustainable patterns of in-commuting to Felixstowe
- The site is entirely contained by Candlet Road to the north, Walton High Street to the south, the A14 (Port of Felixstowe Road) to the west, and existing residential development to the east, limiting the potential for development to encroach into the wider countryside or have harmful landscape impacts. The site is largely enclosed by existing established hedgerows, which can be supplemented to provide further landscape containment.

The site is ideally suited for residential development and its allocation in the AAP is entirely consistent with the Core Strategy's objectives to deliver organic and evolutionary growth on sites immediately abutting existing built up areas.

Scale of residential development required

The AAP "expects" a minimum of 400 dwellings to be delivered on the site, well above the SHLAA's estimate of its maximum capacity of 360 dwellings. My client acknowledges this target and is bringing forward an outline planning application supported by a masterplan that will seek to deliver it. Nevertheless, it is of paramount importance to ensure the delivery of high quality living environments and, ultimately, sustainable communities. It will be necessary to take other constraints into account, such as the need to respect the settings of nearby listed buildings, the requirement to provide sufficient on-site ecological mitigation, recreational provision, play and open space and the lack of market demand for flatted accommodation in this location. These factors will impinge the quantum of development that can be achieved. We trust that the Council will work to ensure that density is informed by the constraints of the site and take a flexible approach, provided that proposals make every effort to make best use of the land available. By the time of presubmission consultation the emerging proposals for the site will be more advanced and its true capacity will be known.

Other site requirements

C - 7271 - 348 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7271 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

My client has acute concerns about the range of other aspirations for the site contained in draft policy FPP4 and its supporting text. The AAP suggests that proposals should have regard to the need for a new link road between Candlet Road and High Street, new business units, retirement/sheltered accommodation or a care home, on-site open space and play equipment and delivery of an alternative facility for Felixstowe Rifle Club alongside the delivery of a minimum of 400 new homes.

Whilst my client is willing to cooperate with the Council wherever possible, the local planning authority must be realistic about what the site can deliver and prioritise the most important objectives for Felixstowe. We strongly contend that making the best use of the site to deliver housing and its supporting infrastructure should take primacy as a consequence of the need to support the Port, the Core Strategy's commitment to deliver a minimum of 1,760 dwellings in Felixstowe before 2027 and the likelihood of an increased requirement within the same timescale arising from the forthcoming early review. Seeking to impose a range of other requirements that are of less importance will only harm viability and, as a minimum, the amount of affordable housing that can be supported alongside CIL and other development costs.

The Council must consider that most of Felixstowe, Walton and the Trimleys are in an area assessed as being of "low" land value in the viability evidence prepared to support its CIL examination. This makes sites particularly sensitive to excessive policy burdens. Paragraph 173 of the National Planning Policy Framework (the Framework) makes clear that pursuing sustainable development requires careful attention to viability and costs in plan making and decision taking, stating that:

"sites identified in the Plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions and other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing landowner and willing developer to enable development to be deliverable."

The Council must be satisfied that the policy burdens it is seeking to impose on the site, in addition to the CIL charge that will apply, will not threaten its viability or the willingness of my client to release it for development. We have not seen any evidence to suggest that this has been fully taken into account and will need to ensure that it is addressed as proposals become more advanced.

My client has specific concerns in respect of the following matters.

Requirement for Business Units

Our client objects to the requirement for the site to deliver business units due to the potential impact on viability and the absence of evidence demonstrating a need. As a consequence the draft policy is unjustified and unsound in this respect and the requirement should be removed.

In accordance with Paragraph 160 of the Framework, the Council should have a clear understanding of the business needs within its area, working with neighbouring authorities to prepare and maintain a robust evidence base. The evidence base on employment needs is out of date, with the most recent economic assessments dating from 2011 (Suffolk's Local Economic Assessment) and 2010 (Oxford Economics Suffolk Coastal Profile and Outlook). In any case, neither of these studies identifies a need for more non-port related employment space on this site or in Felixstowe, or provides any support for the Council's contention that a lack of available non-port related facilities are preventing business growth in the area. Indeed, their main recommendations focus on the need to support the Port of Felixstowe, which the Core Strategy seeks to achieve by providing more housing for employees in closer proximity.

The aspiration to deliver business units on this site appears to have originated from the 'Local Strategy for Felixstowe' prepared by David Lock Associates in 2005 and published in 2006. This document was prepared to set out a 'vision' to guide regeneration in the future but was not in itself based on robust evidence of employment needs and is in any case now ten years old and out of date. The notes from the AAP Member Working Group Meeting held on 3 August 2015 confirm that the requirement to provide non-port related employment space is an 'aspiration' and the AAP should not cite the David Lock report as justification for pursuing it due to the time that has elapsed since it was prepared. As a consequence, the AAP does not refer to any evidence to support its request for business units to come forward.

At the current time there is in fact a clear over supply of business units in Felixstowe. My client has a long term interest in the local economy and a thorough understanding of local needs for business space. Indeed, my client owns four business units (comprising 4,099 sqft floorspace) at Searson's Farm, Trimley St Mary, which have remained empty for 12 months despite extensive marketing at competitive rates. These units are located away from the Port and would be ideal for existing or start-up enterprises unrelated to the logistics sector yet there has been little demand. This is despite a highly accessible location approximately 1.5 miles from junction 59 of the A14, 2.5 miles from the centre of Felixstowe and within walking distance of Trimley Railway Station.

Previous planning consents (1998) on Trinity College commercial expansion land at Clickett Hill Road had included B1 restrictions introduced to try and stimulate demand for B1 diversification on approximately 7 acres, which despite extensive marketing for well over a decade failed to achieve the policy requirement. Haven Gateway Partnership

C - 7271 - 348 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7271 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

commissioned a Feasibility Study (Felixstowe Enterprise Village) from DTZ in 2004 which examined the potential for B1 business and incubator space on the Clickett Hill site. This study is submitted alongside these representations for references. It concluded the market for non-port related B1/incubator space to be non-viable without gap funding, a position which we consider has not changed to the present day. Although a B1 HQ building has now finally been constructed some 15 years later on part of the site, this is for a one in twenty year Port related HQ occupier; the remainder of the B1 allocation area (4.25 acres) has recently been granted planning consent for B8 Port related use.

There is also no evidence to suggest that business units are required to provide a noise attenuation buffer adjacent to the Port of Felixstowe Road and Candlet Road, as suggested by the draft policy. A planning application submitted for mixed use development of the site in 2013 (ref: C/13/0058) proposed residential development adjacent to these boundaries, with noise mitigated by an acoustic landscaped bund. The Council's Environmental Health Officers confirmed that these proposals were acceptable and impacts of noise were not cited as reasons for refusing the application. A similar approach is intended for the current proposals.

Taking account of the impacts that the provision of business units would have on the availability of land for housing, for which there is clearly a pressing need, and the viability of the scheme as a whole, in the absence of any evidence demonstrating need the Council must remove the requirement.

Requirement for Care Home / elderly accommodation provision

My client has no objection to bringing forward proposals which provide for a good mix of housing, including dwellings suitable for the elderly, but does object to the requirement to provide a care home or formal sheltered accommodation alongside the new dwellings. Again, it is unclear what evidence of need this requirement is based on because little justification is provided in the draft AAP. More importantly, the site does not have capacity to support the development of care home or non C3 use-class units alongside a minimum 400 new houses. The requirement is not deliverable, and therefore unsound. The policy wording should be amended to remove the requirement for a Care Home and formal sheltered accommodation and should instead focus on the delivery of a high quality residential development. Taking account of the commitments set out in the Core Strategy, the delivery of housing suitable for all members of the community should be the priority for this site.

Requirement for Open and Play Space

In bringing forward proposals for the development of the site, my client is aware of the need to provide substantial amounts of green open space on the High Street frontage to protect the setting of the nearby listed buildings. This will limit the amount of open space that can be provided elsewhere within the site whilst delivering the scale of residential development the Council is seeking.

My client is happy to bring forward a development that addresses with the Council's adopted play and open space standards, as set out in the Core Strategy under policies SP16 and SP17 and the Outdoor Playing Space SPG. However we object to the wording of paragraph 3.36 of Preferred Policy FPP4 which states 'developers will be required to consider local needs and requirements as part of their proposals alongside the nationally published standards regarding provision.'

It is not specified what 'nationally published standards' the Council is referring to. The policy is vague and moreover it is unnecessary, since any standards set out in national planning policy do not need repeating in the AAP. My client objects to inclusion of this section of the policy because it is unclear, unnecessary and unsound. We would encourage the Council to remove it altogether. Requirements in respect of open and play space can be secured by national planning policy, the Core Strategy and the SPG.

Requirement for the relocation of Felixstowe Rifle Club

My client acknowledges and supports the Council's aspiration to secure an alternative venue for the Felixstowe Rifle Club. As the Council will be aware, Trinity College has been actively working with the Rifle Club, securing planning permission for an alternative site on land that it owns north of the railway line, Nicholas Road, Trimley St Mary on the 13 March 2014 (Planning Ref: C/13/0967). Works are ongoing to progress the reserved matters application for the alternative site. Trinity College is a long term supporter of the Rifle Club, having leased the existing site and facilities on very favourable terms for many years, and is willing to continue working with the Council and the Club to establish an alternative venue in the interests of supporting the local area.

However, my client does not accept that funding replacement facilities for Felixstowe Rifle Club should be the responsibility of Trinity College Cambridge. Whilst the College has been and will continue to be a strong supporter of the Club, all parties must consider that doing so is not a viable commercial venture and is entirely unrelated to the core education and research objectives that the charity exists to promote. If the Council is seeking to impose a planning policy requiring relocation of the Rifle Club facilities, it should be prepared to take the associated costs for the project into account when negotiating other planning obligations associated with the development. The College will be taking forward discussions on this subject with Planning Officers shortly and will object to the proposed policy if cooperation is not forthcoming.

Requirement for a link road between Candlet Road and High Street

C - 7271 - 348 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7271 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

The emerging masterplan being prepared for the site anticipates provision of a link road through the site with a new roundabout providing access to Candlet Road in accordance with the aspiration set out in the draft AAP. Doing so is likely to go beyond what is strictly necessary to provide access to a development on the site of the scale anticipated, which could be served from Walton High Street only, but it would address the Core Strategy's objective to deliver strategic improvements to the local road network.

Providing a roundabout access to Candlet Road will be more costly to develop than taking access from Walton High Street. The Council's Regulation 123 List (May 2015) makes clear that "strategic highway improvements including strategic cycling and pedestrian infrastructure" may be funded by CIL and will not be sought as planning obligations. Taking account of the sensitivities of sites in this area to viability, we would urge the Council to consider whether the proposed roundabout onto Candlet Road should be funded by CIL to ensure delivery of this and other obligations.

Requirement for a Transport Assessment and Air Quality Assessment

My client acknowledges that a Transport Assessment and Air Quality Assessment will be required to support a planning application for residential development. These works were undertaken for the previous planning application and both assessments concluded that residential development could be satisfactorily accommodated with appropriate mitigation, including an acoustic bund to the northern and western boundaries to protect residents from noise pollution arising from the dockspur roundabout, link road and Candlet Road. Updated Transport and Air Quality Assessments will be undertaken to support the current planning application.

Conclusion

In summary, my client is supportive of the proposed allocation of the site to provide a significant amount of new housing to help meet the minimum targets adopted in the Core Strategy, support the needs of the workforce of the Port of Felixstowe and help reverse unsustainable patterns of in-commuting. However, my client has real concerns about the range of other aspirations that proposals for the site are expected to have regard to and would contend that they are undeliverable and unviable. We would urge the Council to focus on the priority, which is to make the best use of land to deliver housing whilst protecting sites elsewhere.

We will of course continue to engage with Suffolk Coastal District Council as my client's outline planning application proposals continue to emerge.

Summary:

The suitability of the site for housing is reaffirmed by its sustainability. The Interim Sustainability Appraisal supporting the AAP consultation identifies that it is one of the most sustainable on the peninsula, scoring particularly well in terms of social effects by providing access to a wide range of key services including employment, health and education. The site is ideally suited for residential development and its allocation in the AAP is entirely consistent with the Core Strategy's objectives to deliver organic and evolutionary growth on sites immediately abutting existing built up areas.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

FEVStage 2 Final Report 27 Jan 05.pdf

S - 7297 - 3843 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7297 Support

Full Text:

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

N/A

Respondent: Felixstowe Chamber of Trade and Commerce Agent:

(Rachel Cronin) [3843]

RESPONSE OF FELIXSTOWE CHAMBER OF TRADE AND COMMERCE TO THE FELIXSTOWE PENINSULAR

AREA ACTION PLAN

FPP4

Felixstowe Chamber of Trade and Commerce supports development of new business units. Business units should consider light industrial and units for start-up businesses offering flexible terms.

The Chamber would also support modem eco design to suit the local environment.

FPP10

Felixstowe Chamber agrees with the policy to promote and safeguard land for employment, whether it relates to Port activities or otherwise. The development of Uniserve may increase the variety of employment opportunities not Port related.

FPP11 & 12

The Chamber supports the use of these area for start-up premises.

FPP14

The Chamber would wish the focus to extend to professional services on the ground floor as well as retail. It is as important for members of the public to access financial and legal services at ground level, particularly for those with disabilities. Many residents will expect such services to be located in the town centre for ease of access.

The Chamber supports the extension of the shared space and the improved connection between the town centre and the tourist centre. Retail in Felixstowe should be seen and promoted as part of the tourist offer.

FPP15

Again, the Chamber would seek an amendment to include reference to professional services being incorporated on the ground floor.

FPP21

The Chamber of Commerce supports the use of properties on the Sea Road to be resort related. The Chamber is concerned that residential and resort uses may conflict, in particular for car parking provision.

The Chamber of Commerce also supports any proposals which provide a link between the sea front and town centre.

FPP23

The Chamber supports the careful development of visitor car parking. Car parking should provide a clear town map with estimated distances on foot to tourist locations. The Chamber would support a one-day roaming ticket allowing visitors to park in any car park on the peninsular to encourage visitors to stay for the day and to explore the range of attractions.

Summary:

Felixstowe Chamber of Trade and Commerce supports development of new business units. Business units should consider light industrial and units for start-up businesses offering flexible terms.

The Chamber would also support modem eco design to suit the local environment.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

C - 7308 - 3949 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7308 Comment

Housing Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

Respondent: Pigeon Investment Management Ltd [3949] Agent: Strutt & Parker (Mr Richard Clews) [3945]

Full Text: 1 INTRODUCTION

1.1 This representation has been prepared by Strutt Parker LLP on behalf of Pigeon Investment Management Ltd in respect of land at Trimley St Martin, Alternative Option Site 3022a in response to the six week public consultation (19th October 2015 to 30th November 2015) on the Felixstowe Peninsular Area Action Plan, Preferred Options Document, hereafter referred to as the Felixstowe Peninsular AAP. It should be read in conjunction with the following documents copies of which are contained within the appendices and summarised in the delivery statement section of this consultation response below:

- * Site Plan;
- * Indicative Layout Plan;
- * Preliminary Drainage Appraisal October 2015;
- * Desk-based Archaeological Assessment;
- * Landscape and Visual Assessment;
- * Preliminary Ecological Appraisal; and
- * Transport Report
- * Phase 1 Contamination Report

2 EXECUTIVE SUMMARY

2.1 As set out in these representations there are some fundamental concerns regarding the soundness of the Felixstowe Peninsular AAP and the Area Specific Policies Development Plan Document (DPD). These relate specifically to the approach adopted and the plan's failure to allocate suitable sustainable sites to address the issues arising from the failure to clearly identify up to date objectively assessed housing need for the District. There appears to be a conflict with Policy SP2 of the Core Strategy (2013) and the requirements of the National Planning Policy Framework(NPPF).

2.2 In respect of the Felixstowe Peninsular AAP, at a site specific level, the concern is that the plan fails to take the opportunity to allocate additional land at Trimley St Martin in accordance with the development strategy set out in the adopted Core Strategy. The site in question, Alternative Option Site 3022a, was identified as suitable in the SHLAA 2014.

It is sustainable, available and deliverable. It would represent a logical extension to the physical development limits of the village. In accordance with the presumption in favour of sustainable development and the need to boost significantly the supply of housing it is contended that it should be included as a Preferred Allocation.

3 POLICY BACKGROUND

3.1 The Site Allocations and Area Specific Policies Development Plan Document Preferred Options Consultation Document, October 2015 has been published for public consultation along with the Felixstowe Peninsular AAP. These two documents seek to provide the policies and allocations necessary to implement the strategic policies set out in the Suffolk Coastal District Local Plan - Core Strategy and Development Management Policies, July 2013 document. Together the Core Strategy, Site Allocations and Area Specific Policies Document and the Felixstowe Peninsula AAP will form the Development Plan for Suffolk Coastal District Council.

3.2 While this representation relates to the Felixstowe Peninsular AAP preferred options document and more specifically proposed allocations in the village of Trimley St Martin, it also has to be considered in the wider context of the planning policy framework for the whole of the District.

4 NATIONAL PLANNING POLICY FRAMEWORK

- 4.1 Paragraph 14 sets out that "a presumption in favour of sustainable development" is at the heart of the Framework and describes this as "a golden thread running through both plan-making and decision taking." It goes on to state that for plan- making this means:
- * "Local planning authorities should positively seek opportunities to meet the development needs of their area;
- * Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change..."

These requirements are repeated in more detail throughout the Framework. Paragraph 15 requires the presumption in favour of sustainable development to be applied to local plan policies so that development which is sustainable can be approved without delay.

- 4.2 The Core Planning Principles set out at paragraph 17 include a set of overarching objectives which should underpin plan making. Of particular relevance to this consultation response are that planning should be:
- * plan-led with up to date plans providing a practical framework for predictable and efficient decisions.
- * Not be about scrutiny but be a creative exercise.
- * Proactively drive sustainable development to deliver the homes the country needs.
- 4.3 Every effort should be taken to objectively identify and meet the needs of the area. Sufficient land suitable for development having regard to market signals should be
- 4.4 Paragraph 47 sets out a clear challenge to local planning authorities "to boost

significantly the supply of housing..." In order to achieve this they should ensure

that their Local Plan meets the full objectively assessed needs for the area and they should identify and annually update their five year housing supply.

4.5 For plan-making paragraph 151 advises that Local Plans should be consistent with the policies and principles of the Framework, "...including the presumption in favour of sustainable development."

C - 7308 - 3949 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

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- 4.6 Paragraph 154 requires Local Plans to be "...aspirational but realistic" and paragraph 159 reminds local planning authorities that they "...should have a clear understanding of housing needs in their area."
- 4.7 Finally, for a local plan to be found sound at examination by an independent inspector the Framework at paragraph 182 advises that it should satisfy the following tests, namely that it is:
- * "Positively prepared the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- * Justified the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- * Effective the plan should be deliverable over its period and based on effective joint working on cross- boundary strategic priorities; and
- * Consistent with national policy the plan should enable the delivery of sustainable development in accordance with the policies in the Framework."
- 4.8 For the purposes of this consultation it is necessary to consider whether the Felixstowe Peninsular AAP satisfies the above objectives.

5 APPROACH TO HOUSING GROWTH

Core Strategy

5.1 At the strategic level housing numbers and distribution are set out in the Core Strategy.

Objective 2 states:

"To meet the minimum locally identified housing needs of the district for the period 2010 to 2027, taking into account existing and future economic, environmental and social opportunities and constraints"

In respect of this objective there are two important points to note. Firstly, that the Core Strategy seeks to meet the minimum locally identified housing need, and secondly, that it is a locally identified housing need for the plan period. 5.2 However, it is considered given the acknowledged short fall that the DPD and AAP should be based on the NPPF principles set out above including; to be aspirational; provide flexibility; positively seek to meet identified needs; and most importantly, to significantly boost housing supply. It is therefore considered that the Felixstowe Peninsular AAP should be setting its own, up to date and ambitious objectives.

5.3 Core Strategy policy SP2 sets out housing numbers and distribution. However, policy SP2 notes that provision will be made for at least 7,900 new homes, distributed in accordance with the settlement hierarchy set out in policy SP19. The policy then goes on to commit to an early review in order to identify the full objectively assessed housing needs for the District, to ensure this is met in so far as this is consistent with the policies of the NPPF.

5.4 The Inspector's report in respect of the Core Strategy Examination (June 2013) made it clear that an early review was essential as at the time the Council had identified an objectively assessed need of 11,000 dwellings. At paragraph 46 of the Inspector's Report he commented:

"Even if the theoretical capacity of all the sites included in the Strategic Housing Land Availability assessment (SHLAA), existing commitments potential brownfield opportunities, allocations carried forward from the previous Local Plan and a windfall allowance were taken into account, the provision would fall some way short of the 11,000 dwellings required."

5.5 At this point, the Inspector clearly gave consideration to suspending the Examination. However, he concluded that as none of the adjoining Councils had objected to the scale of housing proposed, that having a core strategy in place with an early review would be preferable to the alternative of suspension of the examination and the likely withdrawal of the plan.

5.6 While it is noted that the Site Allocations and Area Specific DPD Issues and Options consultation commenced in 2015, it is of significant concern that this occurred ahead of the objectively assessed housing needs for the District being reviewed, updated and firmly established. Policy CS2 states:

"An early review of the Core Strategy will be undertaken, commencing with the publication of an Issues and Options Report by 2015 at the latest. The review will identify the full, objectively assessed need for the District and proposals to ensure that this is met in so far as this is consistent with the policies in the National Planning Policy Framework."

5.7 On the basis of the currently available information the Felixstowe Peninsular AAP and the DPD are inconsistent with this adopted policy, and paragraph 158 of the NPPF which requires that the Local Plan is "...based on adequate, up-to-date and relevant evidence..."

5.8 Table 3.1 of the Core Strategy references the need for an extra 11,000 dwellings as identified in the work commission by Oxford Economics (OE) in 2010. It goes on to suggest that the review should identify land to meet the current acknowledged shortfall between the locally assessed requirement and the OE objectively assessed need (OAN). However, the District still does not appear to have a published understanding of its current OAN. The OE figure of 11,000 dwellings is very old and predates the NPPF. As advised in Planning Practice Guidance regarding housing need assessments, the household projections published by the Department for Communities and Local Government provide the starting point estimate of overall housing need (ID: 2a-015-20140306). The DCLG estimate may require adjustment to reflect factors affecting local demography and household formation rates. However, the Sub National Household Projections (2015) suggest a growth of 8,362 for the period 2010 to 2027 and this is not

referenced in the SAASP document or the AAP. This indicates that the Core Strategy figure promoted in the SAASP is out of date. While the DCLG figure is lower than the OE figure, it is clear that the Core Strategy proposal to provide 7,900 homes is lower than the most recent projections that the Council should be considering as a starting point for

C - 7308 - 3949 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

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understanding its OAN. On the basis that the 2010 OE figure was 11,000, the reality is that the actual objectively assessed need figure is likely to be higher than 8,362 and that 7,900 would fail to meet the OAN.

5.9 Policy FPP1 of the Felixstowe Peninsular AAP gives the impression that it is still working to the Core Strategy target of 7,900 and does not explain if it is actually working to the OE figure or some other estimate and if so what that actually equates to for the AAP. On this basis there must be a concern that at examination the Felixstowe Peninsular AAP will not be found to comply with the tests set out in paragraph 182 of the NPPF, failing all the tests.

Five Year Housing Supply

5.10 In June 2015 Suffolk Coastal District Council published a Housing Supply Land Assessment. This covers the period 1st April 2016 to 31st March 2021 and identifies the current position with regard to identifying a five year +5% supply of housing land which it assess as 5.12 years.

5.11 Paragraph 3 acknowledges the supply in 2014 was 4.3 years this is a figure which has been borne out in appeal decisions as recently as September 2015

(APPJ3530/A/14/2225141). Fundamentally, the current assessment is still based on the Core Strategy target of 7,900. As set out above, this is an acknowledged under estimate of the actual objectively assessed need, which in the absence of anything more up to date, on the best available evidence suggests a target in the region of 11,000 dwellings. 5.12 In addition, it is also observed that the projections contained in table 3 still appear to rely on the early unconfirmed delivery of some large developments with outline permission which are still subject to S106 agreements. Taking these factors into consideration the five year supply with a modest surplus of 0.12 years, must reasonably be considered vulnerable to challenge at this time. If the 11,000 dwelling figure or even the lesser DCLG Household projection of 8,362 are applied then a five year supply in all probability does not actually exist and is at best 4.75 years.

5.13 Again, this point suggests that the Felixstowe Peninsular AAP will struggle to

demonstrate compliance with paragraph 182 of the NPPF at examination and reinforces the need to allocate additional land within the AAP.

Felixstowe Peninsular AAP

5.14 The overall spatial strategy set out in the Core Strategy (see policy SP2) provides for development to be focused in the Eastern Ipswich Plan Area, at Felixstowe and the Trimley Villages and shared between the market towns. Policy SP19 identifies that Felixstowe, Walton and the Trimley Villages will accommodate a proposed housing growth of 22%. Furthermore the Strategic Housing Land Availability Assessment (March 2014) acknowledges:

"The core Strategy expects the Market Towns and the Felixstowe and the

Trimleys area to accommodate a considerable proportion of the growth identified for the district to 2027".

5.15 The Felixstowe Peninsula AAP in policy FPP1 identifies a minimum requirement for a further 807 units before 2027 as necessary to meet the Core Strategy requirement. However, as previously mentioned above these figures are a minimum and the AAP should be seeking to maximise delivery in sustainable locations in order to boost significantly the supply of housing as required by the NPPF. It is therefore contended as set out in more detail above, that policy FPP1 should be setting a more ambitious target, and in the absence of any more recent objectively assessed need, looking to a District target of 11,000 dwellings rather than the 7,900 derived from the Core Strategy. Policy FPP1 should therefore be reworded to identify a higher overall target and as such an appropriate apportionment, for Felixstowe Peninsular. 5.16 It must be acknowledged that the AAP states at paragraph 3.13:

"The Felixstowe Peninsula AAP identifies over 1,100 units on the preferred sites outlined in this document. The Council consider it necessary to over allocate sites across the district to ensure that a five year land supply is maintained which is paramount. Over allocating also provides a range of sites, sizes and locations for development to allow a choice of location for those looking for a residential property. It also takes into account that the population is growing and that the Council's objectively assessed housing need is likely to increase in the future.

The delivery of sites will be monitored throughout the plan period to consider how the AAP is performing against the Core Strategy targets."

5.17 While this additional provision is welcome, it is still unclear if it will provide sufficient sites, which are available and deliverable, to enable the District to demonstrate a five year housing land supply in the short term. The current five year supply is not based on an up to date objectively assessed need. It is therefore contended, that opportunities should be taken to allocate more sustainable sites that can be delivered in accordance with Core Strategy spatial strategy so that the District can significantly boost its supply of housing as required by the NPPF. These sites should allow for variety in house types and

tenures to come forward to meet local needs and ensure choice and competition in the market for land (NPPF paragraph 47).

5.18 From the statement in paragraph 3.13 the Council appears to be acknowledging that the objectively assessed need is rising and site allocations should reflect this. It would therefore seem logical, and in the interests of good planning, for them to plan to meet this need now, by way of the allocation of further sustainable sites.

Felixstowe Peninsular AAP Preferred Site Allocations

5.19 The Felixstowe Peninsular AAP identifies 7 sites as preferred option allocations. Two of these are in Trimley St Martin and one in Trimley St Mary and are identified on the inset maps in the AAP. A summary of the 7 sites is set out below along with some brief summary observations in italics which are considered relevant to this consultation response: 5.20 Preferred Policy FPP3: Land at Sea Road, Felixstowe

Land is identified at Sea Road, Felixstowe for a mixed use development of commercial /tourism uses and residential dwellings. (Indicative Capacity 40 dwellings)

C - 7308 - 3949 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

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Housing

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It is noted that this is a mixed use site and residential development will be dependent on

There is also an issue with sewage capacity which may impact on viability. Finally if the market has to be relocated this could also significantly delay delivery.

5.21 Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

Land is identified north of Walton High Street for a mixture of residential units; including on site open space,

comprehensive landscaping and new business units. (Indicative Capacity 400 dwellings)

This site is dependent on the Rifle Club being relocated, requires a master plan to

include a link road which could in turn impact on viability. The policy acknowledges that it is likely to be a longer term opportunity. There are also air quality and sewage capacity issues to be resolved.

5.22 Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Land is identified to the north of Conway Close for a residential development. (Indicative Capacity 150 dwellings) The site could come forward, however, there are still sewage capacity and air quality issues to be addressed and the site is adjoined by heritage assets.

5.23 Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St

Martin Land is identified on Trimley High Road for residential development with on site open space to provide a village green. (Indicative Capacity 70 dwellings)

The site could come forward with access on to the High Street. The Public House is a listed building and therefore development proposals will have to be sensitive to its status which may limit capacity.

5.24 Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

Land is identified at Howlett Way for residential development with on site open space. (Indicative Capacity 360 dwellings)

Access to the site has not been identified in detail other than off Howlett Way. There are air quality issues and concerns regarding the setting of the Old Rectory. In addition there is a water main crossing the site. The site wraps round the Old Poultry Farm and the Old Rectory both of which may delay availability.

5.25 Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

Land is identified south of Thurmans Lane for residential development. (Indicative

Capacity 100 dwellings)

This site could come forward, again it is subject to air quality issues and the need to have regard to Mill Farm a Grade II Listed Building, it will also have to be accessed through the adjoining residential areas.

5.26 Preferred Policy FPP9: Land at Bucklesham Road, Kirton

Land is identified south of Bucklesham Road for residential development. (Indicative Capacity 15 dwellings)

This is a relatively small ribbon development site which could come forward. There are potentially issues to be resolved in respect of local sewage capacity in the village.

Assessment of Preferred Allocations

5.27 If the preferred site allocations indicative capacities are totalled up cumulatively this suggests they could deliver 1,135 dwellings between them. However, as set out above the delivery, and more importantly, the quantum and likely timing of delivery is much less certain. It is noted that the two largest sites, FPP8 and FPP4 do not appear to be very advanced. With this in mind in order to maintain a realistic five year supply it will be important for the District to maintain the delivery of smaller sites which can readily come forward.

6 ALTERNATIVE OPTION SITE 3022A

6.1 The site the subject of this representation, Alternative Option Site 3022a is just such a site and accordingly it is contended that it should be included as a preferred allocation on the basis that it is available and deliverable at the present time. In addition, it does not need to overcome the issues and constraints associated with some of the preferred allocations set out above and as such can contribute to the acknowledged shortfall in housing need, within the first five years of the Plan period. It is also contended that the AAP should be more ambitious in order to meet local housing need and it would be appropriate for the site to be included based on the presumption in favour of sustainable development

6.2 When considering the Trimley Villages and the opportunities for further allocations, Trimley St Mary is the larger of the two settlements and any significant further expansion may potentially undermine the sustainability of it as a village. Trimley St Martin being the smaller of the two settlements would appear to have greater capacity to absorb further growth. Trimley St Mary is also constrained by its proximity to Felixstowe, the ANOB designation to the south-west, the A14 to the north-east and its proximity to Trimley St Martin to the north. There are therefore few obvious alternative locations for the expansion of its physical development limits. On this basis, there is considerably more potential to be looking at a further extension of the physical development limits of Trimley St Martin.

6.3 In so far as this consultation is concerned, clearly a further allocation on the northwestern side of Trimley St Martin would make a positive contribution towards housing delivery. Alternative Option Site 3022a is in a sustainable location and is not environmentally sensitive. It does not represent a risk of coalescence and is a natural and logical extension of the settlement with clear and defensible boundaries. It is contained to the north-east by the allotment gardens, by the existing built development in the western corner, the road and established settlement to the south. As set out below it is a deliverable site with no obvious constraints or limitations. It is available and could come forward very quickly to make an almost immediate contribution to boosting local housing supply. As such, it is considered that it should be identified as a preferred

residential site allocation.

Sustainability Appraisal

6.4 It is surprising that Alternative Option Site 3022a did not score more highly in the Preferred Options Sustainability Appraisal when compared to the preferred sites listed above.

C - 7308 - 3949 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7308 Comment

Housing

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6.5 The overall assessment concluded for site 3022a as follows:

"The site scores well in terms of economic effects due to its close proximity to employment opportunities and given relatively good public transport provision. The loss of Grade 2 agricultural soil results in a major negative environmental effect. However, there may be scope for mitigation."

6.6 In response to the major negative environmental effect of using Grade 2 agricultural land, it is clear that there is no difference with the conclusions for a number of preferred allocations. The proposed site is on the boundary of grade 2/3 agricultural land. All undeveloped and proposed allocation sites within Trimley St.Mary and Trimley St.Martin are on Grade 2 Agricultural Land. The proposed site is therefore no more important for protection as agricultural land than the allocated sites and may in fact be less desirable due to the size of the site and the overall quality. One of the objectives where the site did not score very favourably was in respect of SA Objective 8, to improve the quality of life and where people live. The SA comment here incorrectly assumed that the site will be accessed via the adjoining estate roads and as such could potentially result in a negative

impact for local residents. The reality, as set out in more detail in the delivery statement below, is that access can be provided directly on to High Road.

6.7 In respect of the site assessments and commentaries for the preferred allocations set out in the AAP, there appear to be a number of reoccurring themes which do not necessarily appear to be reflected in the sustainability appraisals. These are as follows:

Air Quality: This is clearly an issue with air quality assessments being required for the majority of the preferred allocation sites. This is an issue, particularly associated with proximity of the sites to the urban area of Felixstowe and major transport routes including the A14. In respect of the majority of the preferred allocations, and in particular the largest sites, these are more closely related to the A14 and Felixstowe than Alternative Option Site 3022a. As such, simply on the basis of the degree of separation, it can be concluded that site 3022a will perform better in respect of air quality.

Sewage Capacity: Sewage capacity is an issue raised by Anglian Water in respect of the Felixstowe sites and the site in Kirton. These sites potentially require improvement to the capacity of the foul sewer network. This does not appear to be an issue for the Trimley Villages and as set out in the delivery strategy below a preliminary foul and surface water drainage strategy has already been prepared for Alternative Option Site 3022a.

Noise: The potential impact of noise does not appear to have been given much consideration. It should be noted, that some of the preferred allocations lie adjacent to junctions on the A14. These sites or parts thereof may be susceptible to noise disturbance which may require mitigation and/or potentially reduce the developable area. Alternative Option Site 3022a, lies to the south of the A14 separated by the established allotment gardens and as such is unlikely to be adversely affected by noise from the road.

Transport Assessments: The larger preferred option allocations will require transport assessments to be carried-out. These may potentially reveal highway safety or capacity issues which could impact on the quantum of development achievable and delay delivery. This would not be necessary with the scale of development proposed on Alternative Option Site 3022a.

Heritage Assets: A number of the preferred option sites have a close relationship with existing heritage assets. In some cases the SA scored these relationships to be positive on the basis that the setting may be improved. It does not necessarily seem reasonable that a site that will have an impact on heritage assets should score more highly than one where heritage assets are unaffected as is the case with Alternative Option Site 3022a.

6.8 In conclusion it is clear from the above that Alternative Option Site 3022a has many advantages over some of the preferred allocation sites and there are no obstacles to it coming forward for development. It is in a sustainable location and could readily deliver much needed housing, including affordable housing, a significant social benefit, with very limited environmental consequences. This assessment further supports the case that it should be included as a preferred allocation.

Deliverability

6.9 Trimley St Martin lies to the west of Felixstowe, between the A14 to the north-east and the railway line to the south-west. The village of Trimley St Mary lies immediately to the south east separated by a small gap. The 2011 Census reported the population of Trimley St Mary as 3,673 and the population of Trimley St Martin as 1,932. The two villages are immediately adjacent to Felixstowe and identified in the Core Strategy as Key Service Centres due to their extensive range of facilities and proximity to Felixstowe.

6.10 Alternative Option Site 3022a, is situated on the north-western side of the village. It lies to the east of High Road, which runs parallel with the A14, connecting Felixstowe via the A1156 to Ipswich. The south-eastern side of the site abuts the residential properties of Mill Close with extensive allotment gardens lying to the north-east. The western corner of the site contains a group of existing dwellings and buildings used for commercial purposes. Beyond the site to the north-west are arable fields.

6.11 The site was in part submitted and considered under the SHLAA 2014 (site 383a) it was discounted due to concerns regarding vehicle access. Mill Close was not considered to be suitable as an accesses route and the Highway

C - 7308 - 3949 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

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Authority was not in favour of direct access from High Road.

6.12 Since 2014 extensive work has been undertaken by Pigeon Investment Management Ltd to overcome the concerns relating to access and demonstrate the sites deliverability. A summary of the work to date is set out below which demonstrates the site's deliverability.

Indicative layout plan

6.13 An indicative layout plan, drawing number 015 - 015 - 00 has been prepared for the site (see Appendix). This shows how the site could be developed to deliver a range of house types including 18 affordable units. The proposed layout demonstrates that the site can deliver housing which respects the surrounding pattern of development. A strong frontage along high Road will provide a connection between the existing settlement and the group of existing buildings to the west of the site. This will be focused around the new highway access which will create an attractive and framed entrance into the development. The internal layout picks up on pedestrian connectivity through to Mill Close providing some additional frontage plots in the eastern corner of the site.

Elsewhere the proposed dwellings and street layout seeks to extend the established pattern of buildings along the site boundaries. Open space and gardens are provided along the north-eastern boundary in order to respect the presence of the allotment gardens. A large area of open space to serve the development (and the existing village) is proposed to the north which will provide a sensitive edge and integration with the open farm land beyond.

6.14 The layout demonstrates that an appropriate density of development can be provided along with a range of house types. The proposed layout can also meet garden space requirements and parking provision while respecting the amenities of adjoining residential properties.

Affordable Housing

6.15 The indicative layout shows the site could include 18 affordable units, including a variety of house types and sizes to meet local need. This will be a significant local benefit.

Heritage Assessment

6.16 The site does not lie with or adjacent to a conservation area and there are no Listed Buildings or other Heritage Assets on or nearby.

6.17 A desk-based assessment of archaeological significance was undertaken in November 2015. This report concludes that there is no evidence that proposed development will have any impact on the significance or setting of designated heritage assets of archaeological interest. It suggests that development could have an impact on the significance of undesignated heritage assets indicated by crop marks but that their significance is unlikely to be sufficient to preclude development and impact on them may be mitigated by the formulation of an appropriate archaeological strategy.

Flood Risk

6.18 The entire site is located within Flood Zone1; land assessed as having a low probability of flooding from fluvial sources. In addition, the site is not identified to be at risk from surface water or reservoir flooding, according to the Environment Agencies Flood Maps for Planning.

6.19 The development will not increase the risk of flooding post development as attenuation measures will be provided on site as part of the proposal to accommodate surface water run-off generated from the critical duration 1 in 100 year event, including an allowance for climate change.

Drainage Strategy

6.20 A preliminary drainage strategy has been prepared for the site which concludes that foul water from the development will be able to flow via gravity to the existing Anglia water sewer located in the High Road.
6.21 In respect of surface water drainage the underlying geology is expected to be of high permeability which will allow surface water run-off to discharge via infiltration. It identifies that an infiltration basin can be provided within the public open space to accommodate surface water run-off from the proposed highway. The surface water from roofs can be discharged via soakaways with permeable paving included to drain the private access roads, parking areas and driveways.

Landscape and Visual Assessment

6.22 A landscape and visual assessment of the site has been carried out and it concludes that there is capacity within the landscape to absorb change.

6.23 It suggest that given the nature, character and visual quality of the existing settlement edge and the poor quality of the existing edges of the site, it has a High Capacity to accommodate change, and the potential to enhance the settlement edge.

6.24 As such there are few constraints or issues in landscape and visual terms that would prevent the site being considered for development.

Preliminary Ecological Appraisal

6.25 A preliminary ecological appraisal has been carried out for the site. Ten habitats were identified during the Extended Phase 1 Habitat Survey including scattered broadleaved and coniferous trees, scattered scrub, poor semi-improved grassland, scattered bracken, tall ruderal, arable, introduced shrub, and species-poor intact and defunct hedgerows. In addition the field margins on-site provide opportunity for common invertebrates, reptiles, birds, and foraging / commuting bats. The report makes a series of recommendations in respect of mitigation measures and good practice during development however, no Phase 2 survey work was required. It is clear that there are no ecological barriers to the

sites development.

C - 7308 - 3949 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7308 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

Transport Report

6.26 A transport report has been prepared for the site which concludes that the proposed development can be served by an acceptable access to the highway network. The report confirms that the site is located in a sustainable location with bus stops on the boundary providing frequent services and footway connections to local facilities.

6.27 A new access can be provided onto High Road which complies with highway standards and provides adequate visibility and capacity. The existing local infrastructure can support the additional traffic generated, including through the use of more sustainable modes of transport as alternatives to the private motor car, such as cycling, walking and public transport.

6.28 The transport report confirms that access can be provided directly onto High Road and that it will not be necessary to take access via Mill Close as assumed in the assessment of the SHLAA 2014 (site 383a). This therefore overcomes the key reason for the site being discounted due to concerns regarding vehicle access.

7 CONCLUSION

7.1 As set out above and referred to elsewhere in this consultation response Alternative Option Site 3022a is available and deliverable. There are no obstacles to its development and clearly proposals are at an advanced state. The indicative layout confirms that a policy compliant scheme can be delivered which will include market and affordable housing, a large area of open space and improved connectivity.

7.2 As indicated in the landscape and visual assessment, the proposed development will be an attractive addition to the settlement, improving the quality of existing north western edges of the village.

7.3 The site is not in a flood risk area and can be suitably served by both foul and surface water drainage.

7.4 Development of the site will have no impact on designated heritage assets and any impact on undesignated assets can be mitigated. Additionally, there are no ecological barriers to the sites development.

7.5 The site is in a sustainable location with good access to local services and facilities. A new point of vehicle access, which accords with adopted standards, can be provided to High Road overcoming the original reason for the site being discounted in the SHLAA 2014 (site 383a).

7.6 Policy FPP1 of the Felixstowe Peninsular AAP is still working to the Core Strategy target of 7,900 rather than the 11,000 OE figure or an up to date objectively assessed need, as required by Core Strategy Policy SP2. In addition, the current five year supply is not based on an up to date objectively assessed need. It is therefore contended, that the Felixstowe Peninsular AAP should take the opportunity to allocate more sustainable sites that can be delivered in order to meet the requirement of the NPPF to "significantly boost its supply of housing" and assist in the maintenance of a five year supply of housing land.

These sites should allow for variety in house types and tenures to come forward to meet local needs and ensure choice and competition in the market for land (NPPF paragraph 47).

7.7 In conclusion, it is clear that Alternative Option Site 3022a has many advantages over some of the preferred allocation sites and there are no obstacles to it coming forward for development. It is in a sustainable location and could readily deliver much needed housing, including affordable housing, a significant social benefit, with very limited environmental consequences. It does not represent a risk of coalescence and is a natural and logical extension of the settlement with clear and defensible boundaries.

7.8 For the reasons set out above it is clear that Alternative Option Site 3022a should be included as a preferred allocation in the Felixstowe Peninsular AAP.

APPENDICES [see attached documents]

See Attachments to Representation Submission for following documents:

- A. Location Plan
- B. Indicative Layout Plan
- C. Preliminary Drainage Appraisal (October 2015)
- D. Desk-based Archaeological Assessment
- E. Landscape and Visual Assessment (November 2015)
- F. Preliminary Ecological Appraisal
- G. Transport Report
- H. Phase 1 Contamination Report

Summary:

Land is identified north of Walton High Street for a mixture of residential units; including on site open space, comprehensive landscaping and new business units. (Indicative Capacity 400 dwellings)

This site is dependent on the Rifle Club being relocated, requires a master plan to

include a link road which could in turn impact on viability. The policy acknowledges that it is likely to be a longer term opportunity. There are also air quality and sewage capacity issues to be resolved.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

Appendix C - Prelimiary Drainage Appriasal Oct 15 trimley.pdf

Appendix B - Indicative Layout Plan (015-015-002).pdf

Appendix C - Prelimiary Drainage Appriasal Nov 15 trimley.pdf

C - 7308 - 3949 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7308 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

Appendix H - Phase 1 Contamination Report (Pt2).pdf Appendix H - Phase 1 Contamination Report (Pt1).pdf Appendix G - Transport Statement (November 2015).pdf

Appendix F - preliminary Ecology Appraisal Trimley.PDF
Appendix E - Landscape and Visual Assessment Summary November 2015.pdf

Appendix E - FR 3659 Figure 5 Photosheets_LR.pdf

Appendix E - FR 3659 Figure 4 Landscape Charcter Assessment.pdf

Appendix E - FR 3659 Figure 3 Landscape and Heritage Designations and Public Rights of Way.pdf

Appendix E - FR 3659 Figure 2 Statutory Designations(1).pdf

Appendix E - FR 3659 Figure 1 Site Plan with Photo Locations(1).pdf

Appendix D - Trimley St Martin Desk Based Archaeological Assessment.pdf

Appendix A - Location Plan Trimley.pdf

O - 7315 - 3950 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7315 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street. Felixstowe

Ν/Δ Respondent: Felixstowe Rifle Club (R S Waldron) [3950] Agent:

Full Text:

Felixstowe Rifle Club has a very wide range of members of all abilities; from Junior members (some having undertaken Duke of Edinburgh Awards) to British Champions in both VI (Visually Impaired) and DSGB (Disabled Shooting Great Britain) amongst others. It is also very active in the twinning of Felixstowe with Wesel holding regular exchange visits and competitions.

The Rifle Range is in an ideal location; there being an excellent bus service, and a controlled road crossing. This enables people with disabilities (both physical and VI) to independently access the Club's facilities. Moving the Club to a location where these services are not available would be detrimental to the inclusion of members with disabilities.

It is also on record that many people who have felt excluded by society

through disability have discovered that there is something that they can do, and do well with practice. Target shooting provides a degree of social inclusion that in turn encourages well-being and confidence in men and women, girls and boys of all ages and disabilities.

We have the support of MENCAP, ESAB, IFIT and The Inclusion Officer for Suffolk Sport. The lady who became British VI Champion would never have achieved this as she was dependent on the bus service.

The proposed location of the new range would require a person relying on public transport to travel over half a mile, including navigating a level crossing and then 200 yards of track. This is totally unacceptable for a wheelchair user or a VI person. Hence their exclusion from a sport that enables them to compete on equal terms with those not having disabilities, with the obvious potential benefit to their well-being.

The Range would provide additional barrier and separation.

Although the proposed site has been approved, due to site restrictions the estimated cost of building the new range now exceeds £800,000, which could jeopardise the project.

The extra separation, if the Rifle Club stays as is, would further aid the air quality for the residential development.

The introduction of Business Units alongside the Rifle Range would ensure an adequate buffer between Dock Spur Road and the residential area.

With a slight decrease in area to be developed as a residential site, there would be a reduction of the impact on the volume of traffic that would result from the combination of this development together with that of (DC/13/3821/OUT: 190 residential units South of Walton High Street). Traffic movements to the Range are not usually at peak times for residential sites and therefore would not impact on the peak traffic movements.

Felixstowe Rifle Club's range does and would still provide Open Space and it is acknowledged that rifle ranges in general are wildlife havens. There is evidence in recent times of a badger sett on the range.

Together with the listed barns, the frontage to the Rifle Range is sympathetic to Walton Hall being a Grade II* listed building and has be such for over 60 years.

It is understood that Trinity College considered us remaining on our current site, however, decided that the presence of a rifle range would

be detrimental to house sales. As stated above re paragraphs 3.26, 3.28, 3.29, 3.33, we feel this is not so and there are several measures that can be taken that would mitigate further any noise emitted from our site and make our presence lower key.

Our supporters feel that we are a valued asset to the community, which will lose its worth by being relocated to an area with no public transport. We are currently applying for formal status as a Community Asset but realise the nomination may not be processed before your decision is made.

I sincerely hope that Suffolk District Council, who have a duty of care, will consider the points raised and support the premise that the Felixstowe Rifle Club should remain in its present location.

O - 7315 - 3950 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7315 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Summary: The Rifle Range is in an ideal location; there being an excellent bus service, and a controlled road crossing. This

enables people with disabilities (both physical and VI) to independently access the Club's facilities. Moving the Club to a location where these services are not available would be detrimental to the inclusion of members with disabilities. The proposed location of the new range would require a person relying on public transport to travel over half a mile, including navigating a level crossing and then 200 yards of track. This is totally unacceptable for a wheelchair user or a

VI person.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7382 - 3952 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7382 Comment

Housing Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

Respondent: Anglian Water (Mr Stewart Patience) [3952] Agent: N/A

Full Text:

Thank you for the opportunity to comment on the Site Allocations and Area Policies Preferred Options Document and Felixstowe Peninsula Area Action Plan. Please find enclosed comments on behalf of Anglian Water.

Site Allocations and Area Specific Policies Preferred Options Consultation Document

Policy SSP3: Land rear of Rose Hill, Saxmundham Road Aldeburgh

Anglian Water has no objection to the proposed allocation of this site for open market housing and a care home.

Paragraph 2.28 (page 30)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.28 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP4: Land at Mill Road Badingham

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.32 (page 32)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.32 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP5: Land Adjacent to Corner Cottages, Main Road, Benhall

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP6: Land south of Brook Cottage, Benhall

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.35 (page 34)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.35 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP7: Land opposite Townsfield Cottages, Dennington

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.40 (page 37)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.40 should be amended to refer to the management of surface water run off in

C - 7382 - 3952 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7382 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

accordance with the surface water management hierarchy.

Policy SSP8: Land south of Ambleside, Main Road, Kelsale cum Carlton

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.46

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.46 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP9: Land north of Mill Close, Orford

It is expected that there may be a need for improvements to the sewerage treatment capacity to enable the development of this site.

Policy SSP10: Land west of Garden Square Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP10:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP11: Land rear of 3 -33 Suffolk Drive, Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP11:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP12: Land north-east of Street Farm

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP12:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP13: Land fronting Old Homes Road, Thorpeness

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP13:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP14: Land south of Lower Road Westerfield.

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP15: Land at Old Station Works, Main Road Westerfield

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP15:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP16: Land at Street Farm, Witnesham (Bridge)

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP17: Land south of the primary school, Witnesham

Anglian Water has no objection to the proposed allocation of this site for residential development.

C - 7382 - 3952 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7382 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

Policy SSP18: Ransomes, Nacton Heath

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP13:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP19: Land at Silverlace Green(former airfield) Parham

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required.

Therefore it is recommended that these issues are investigated further and Policy SSP19 is amended accordingly.

Policy SSP20: former airfield Parham

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required.

Therefore it is recommended that these issues are investigated further and Policy SSP20 is amended accordingly.

Policy SSP21: former airfield Debach

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required. Therefore it is recommended that these issues are investigated further and Policy SSP21 is amended accordingly.

Policy SSP22: Bentwaters Park, Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP22:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP23: Carlton Park, Main Road, Kelsale cum Carlton

Anglian Water has no objection to the proposed allocation of this site for employment development.

Policy SSP24: Levington Park, Levington

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP24:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP25: Riverside Industrial Estate, Border Cot Lane, Wickham Market

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP25:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP31: Snape Maltings

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site for arts, recreation and tourism related development. It is therefore suggested that the following text should be include in Policy SSP25:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Felixstowe Peninsula Area Action Plan Preferred Options Consultation document

Policy FPP3:Land at Sea Road, Felixstowe

C - 7382 - 3952 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7382 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP4: Land north of Walton High Street, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP5: Land north of Conway Close, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is therefore suggested that the following text should be include in Policy FPP6:

'Improving the capacity of the foul sewerage network'

Policy FPP7: Land off Howlett Way, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is therefore suggested that the following text should be include in Policy FPP7:

'Improving the capacity of the foul sewerage network'

Policy FPP8: Land off Thurmans Lane, Trimley St Mary

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP8:

'Improving the capacity of the foul sewerage network'

Policy FPP9: Land at Bucklesham Road, Kirton

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Policy FPP9 refers to 'reinforcement of connections'

The term reinforcements is normally used in the context of water mains and not foul sewers when referring to improvements within the network.

It is therefore suggested that the following text should be include in Policy FPP9:

'Improving the capacity of the foul sewerage network through reinforcement of connections by making necessary improvements to ensure that capacity can be made available'

Policy FPP10: Port of Felixstowe

It is noted that it proposed to allocate land at the Port of Felixstowe for strategic employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Policy FPP11: Land at Bridge Road, Felixstowe

It is noted that it proposed to allocate land at Bridge Road for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Policy FPP12: Land at Carr Road/Langer Road, Felixstowe

It is noted that it proposed to allocate land Carr Road/Langer Road for employment uses.

C - 7382 - 3952 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7382 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP12:

'Improving the capacity of the foul sewerage network'

Policy FPP13: Land at Haven Exchange, Felixstowe

It is noted that it proposed to allocate land at Haven Exchange for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP13:

'Improving the capacity of the foul sewerage network'

Summary:

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Change to Plan

Appear at exam?
Not Specified

Legal?

Sound?

Duty to Cooperate?

Soundness Tests

Not Specified Not Specified None

C - 7403 - 3957 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7403 Comment

Housing Preferred Policy FPP4: Land north of Walton High

Street. Felixstowe

Respondent: Suffolk Sport (Mr Taiwo Ajayi) [3957] N/A Agent:

Full Text: Home to Felixstowe Rifle Club.

The Felixtowe Riffles Club is a great community resource as it provides the opportunity to participate in the sport of

shooting in a number of categories and disciplines.

The club have produced a number of national and international athletes competing on the world stage. The club has produced a number of top disability elite athletes competing at the Paralympics games as well as international shooting

The facilities is well used by disabled athletes who relay on public transport links to make their independent travel to the venue, using a mixture buses and trains. They have athletes all over the country visiting them for training and

competitions

The club has build a very good reputation for producing top disabled shooters and their facilities are accessed by public

transport by the disabled athletes and local groups in the area and the county of Suffolk.

If the club was to be relocated it needs to be relocated to an area that has the same current transport links as they currently have now i.e. on a regular and frequently used bus route, within a reasonable walking distant from the train station. Access to the venue needs to consider the users and their disability i.e. not the facilities on the end of a dirt track that inaccessible by wheelchair users and people who can not walk unaided. The facilities should be replaced by like for like or enhanced facilities and existing services and facilities. They should not be offered less to what the club has now and this includes the transport infrastructure and local amenities that many of the club members and visitors access. We are not against any relocation of the Home to Felixstowe Rifle Club, as long as it not disadvantaged the club members, visitors and opportunities to continue the sport of shooting in any way. They do not receive less to what the building, existing services, facilities, and transport infrastructure to what they have now. And that any move would

help to promote and enhances the opportunities for the community to have a go at the sport of shooting.

If the club was to be relocated it needs to be relocated to an area that has the same current transport links as they Summary: currently have now i.e. on a regular and frequently used bus route, within a reasonable walking distant from the train

station. Access to the venue needs to consider the users and their disability i.e. not the facilities on the end of a dirt track that inaccessible by wheelchair users and people who can not walk unaided. The facilities should be replaced by

like for like or enhanced facilities and existing services and facilities.

Change to Plan

Legal? Sound? **Duty to Cooperate? Soundness Tests** Appear at exam?

Not Specified Not Specified Not Specified Not Specified None

O - 7408 - 3920 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7408 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Mr Rodney Waldron [3920] Agent: N/A

Full Text:

Felixstowe Rifle Club has an active involvement in the inclusion of people with disabilities. Hosting ESAB (East Suffolk Association of the Blind) twice monthly, plus several VI individual members of the Club; MENCAP are hosted once monthly.

It is also an official regional hub for DSGB (Disability Shooting Great Britain) one of the objectives being to discover and train potential paralympians. Hence we have the support of ESAB, MENCAP, IFIT Suffolk and The Inclusion Officer for Suffolk Sport.

The location of our site is in an excellent position to enable us to provide these much appreciated services, being on an excellent public transport route and also having a controlled road crossing immediately adjacent to our entrance.

Although I much appreciate SCDC having inserted a clause in the plan that requires Felixstowe Rifle Club to be relocated before development of the current site, I feel that you should seriously consider allowing Felixstowe Rifle Club to remain on its current site, for the following reasons:

- 1 The relocation will in effect be an active act of exclusion for people with disabilities, as the nearest public transport (bus being the only practical one for large powered wheelchairs) would result in a further journey in excess of half a mile by foot or wheelchair, including traversing a level crossing and a section of unmade up track.
- 2 The current range would act as an additional buffer from the A14, further aided by a strip of light industrial buildings alongside the rifle range.
- 3 The cost of relocation, due largely to the restraints caused by the new site's location (the building of a 50m indoor range), has become prohibitive (in the region of £800,000).

It is understood that Trinity College have considered allowing us to remain on site but have fears that our presence may compromise house sales, hence the value of the site as a whole to them. I do not agree with this and feel that some earth works, together with landscaping, and including some other measures would mitigate any problems.

I sincerely hope that Suffolk Coastal District Council, which has a duty of care, will consider the points raised and support the premise that FRC should remain on its current site, as relocating will be detrimental to the inclusion of people with disabilities.

Summary:

The location of our site is in an excellent position to enable us to provide these much appreciated services, being on an excellent public transport route and also having a controlled road crossing immediately adjacent to our entrance. The relocation will in effect be an active act of exclusion for people with disabilities, as the nearest public transport (bus being the only practical one for large powered wheelchairs) would result in a further journey in excess of half a mile by foot or wheelchair, including traversing a level crossing and a section of unmade up track.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7498 - 4020 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7498 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Mr Adrian Schoeberl [4020] Agent: N/A

Full Text: I am a member of Felixstowe Rifle Club and I am also disabled. I shoot with a disabled group at the club - we have a

variety of disabilities ranging from being blind, through mobility issues and permanently wheelchair bound. It is an extremely important facet of life for all of us and enriches our lives on so many levels. The club per se is also a very important asset to the community as a whole. I am writing to voice my serious concerns if the club were to move, not least because of lack of infrastructure to access the new site proposed as there is little in the way of buses and transport links. This would lead to several disabled members, some from afar afield as Ipswich and beyond, being precluded from enjoying this facility and therefore is detrimental from their well being. I include myself in this as shooting has become

almost my only activity and enjoyment on a week to week basis.

Summary: I shoot with a disabled group at the club-we have a variety of disabilities ranging from being blind, through mobility

issues and permanently wheelchair bound. It is an extremely important facet of life for all of us and enriches our lives on so many levels. The club per se is also a very important asset to the community as a whole. I am writing to voice my serious concerns if the club were to move, not least because of lack of infrastructure to access the new site proposed

as there is little in the way of buses and transport links.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified Non

O - 7499 - 4021 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7499 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: E & P Rastrick [4021] Agent: N/A

Full Text: We regard this an appropriate development because:

- access to the High Road will be significantly increased and the infrastructure traffic will be placed into on overstretched

and hazard situation particularly if other areas in the Walton / Trimley area will have increased traffic.

- schools altho short term beneficiaries, will not receive sustained long term funding which will be detrimental in the long

term

- GPs - not enough for existing community

- Why create an artificial village green when there is a good space immediately in front of the Hand in Hand? The land is

prime agricultural land

- the increased traffic through the villages will affect those trying to exit from Mill Lane.

- Increase in traffic detrimental to the well being of those people who live along the High Road

Summary: -access to the High Road will be significantly increased and the infrastructure traffic will be placed into on overstretched

and hazard situation.

-schools altho short term beneficiaries, will not receive sustained long term funding which will be detrimental in the long term.

-GPs -not enough for existing community

-Why create an artificial village green when there is a good space immediately in front of the Hand in Hand?

-the increased traffic through the villages will affect those trying to exit from Mill Lane.

-Increase in traffic detrimental to the well being of those people who live along the High Road

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7500 - 4022 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7500 Object

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Patrick Haseman [4022] Agent: N/A

Full Text: We will never have enough of so called affordable homes. Every time a policy is passed it comes back with less

because the developer wants more profit.

The whole area is taking way over the top of housing for the whole eastern region. We do not need this many homes.

Policy Fpp4; Land North of Walton High Street

First I must stress I'm opposed to any building on this land as it is dedicated grade one farm land and should be left as

such.

But if the powers to be decide this is acceptable then I would like to make the following comments.

3.27

The reallocating the Rifle Club to put in place unneeded industrial units to form a buffer between the residential area and the Dock Spur Road. The expense of moving the Rifle Club which has been there for many years to a new location seems so unnecessary when it is already providing the buffer you require.

3.32

It was proved when the Tesco's application was submitted that Walton High Street could not cater for any extra traffic. Providing a link road between Cadlett Road and Walton High Street will become a rat run for traffic going to the Port using Maidstone Road another Road which is over used.

3.33

The original plans for the Academy had the main building backing on to the railway line but it was brought forward so this development could go ahead. Again it would be bringing more traffic onto the over use Walton High Street. Would it not be better to use this are for recreational purposes such as playing a sports area seeing it is adjacent to the Felixstowe Academy.

Felixstow

Summary: First I must stress I'm opposed to any building on this land as it is dedicated grade one farm land and should be left as

such.

But if the powers to be decide this is acceptable then I would like to make the following comments.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7584 - 3839 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7584 Comment

Housing Preferred Policy FPP4: Land north of Walton High

Street, Felixstowe

Respondent: Mr Steve McCullough [3839] Agent: N/A

Full Text:

I read with interest that some proposed developments within the peninsular area action plan, have the following paragraph attached. These are:-

- * SHLAA Ref 1011c. Sunday Market Site.
- * SHIAA Ref 451g, Land north of High St Walton,
- * SHLAA Ref 502e, Land north of Conway Close and
- * SHLAA Ref 383f and 451f, Land south Of Thurmans Lane, Trimley St Mary

"Anglian Water have identified that there is limited capacity in the foul sewerage network and the connections to this network may need tobe reinforced as a result of additional dwellings in this area. The capacity of the foul sewerage network is a constraint that needs to be overcome to the satisfaction of Anglian Water"

The routing of the Anglian Water outfall crosses a significant part of the Port Of Felixstowe's infrastructure. There has been an issue I have known about for the last five years, whereby at every high tide, a significant amount of treated water emerges from two drain covers in close proximity to the Main Office of Tomline House.

Anglian Water has advised the Port, it is due to their pump not being able to overcome the pressure of the tide against the outfall. The pump is required to run 24/7 to try and meet current demand and housing level.

To accommodate any new development, this situation surely must be remedied. If Anglian Water needs to upgrade their pipework capacity, they will have to excavate in some of the most recently developed areas of the Port and at considerable disruption to its Operations. Some of the network crosses a currently undeveloped site but it is only matter of time before the Port will want to incorporate this as part of its expansion programme.

Is Anglian Water prepared to undertake and pay for this multi million pound project?

Surely Suffolk Coastal District Council will want to see that Anglian Water have improved the infrastructure first, before considering any potential housing requirements?

Summary:

To accommodate any new development, this situation surely must be remedied. If Anglian Water needs to upgrade their pipework capacity, they will have to excavate in some of the most recently developed areas of the Port and at considerable disruption to its Operations. Some of the network crosses a currently undeveloped site but it is only matter of time before the Port will want to

incorporate this as part of its expansion programme.

Is Anglian Water prepared to undertake and pay for this multi million pound project?

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

C - 7615 - 2581 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7615 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text:

Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

- * FPP4 Walton Field evaluation has identified an Early-Middle Bronze Age funerary landscape across the site, with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.
- * FPP6 Trimley Cropmarks on this site show that there are complex archaeological remains of pits, ditches and a coaxial field system and trackways of possible late prehistoric date (TYN 122). Archaeological remains are therefore known on the site, although they have not been fully characterised.

Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7615 - 2581 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7615 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

Early Education

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The Government has indicated that it will legislate to double the number of hours' free childcare to 30. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

- In the Trimleys, developer contributions have already been secured to help manage the existing deficit in Early Years places and proposals are being drawn up to deliver additional places. Further development of the scale proposed (530 dwellings) will necessitate significant additional provision. Under current statutory arrangements, this would necessitate 53 additional places. When Land North of Walton High Street (400 dwellings) is included, the number of places required under current arrangements would increase to 93.

The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

- Development in the remainder of Felixstowe (150 dwellings North of Conway Close and 40 dwellings at Sea Road) can be managed by expanding existing settings.
- At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

The County Council would appreciate consideration of ways in which this policy could be more supportive of early education in retail centres, as part of a balanced policy which also protects the vitality and viability of retail centres. Policy FPP17 appears to implicitly support early education already, and discussion with the District Council may conclude that this policy is sufficient.

Primary Education

The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7615 - 2581 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7615 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

[see table in attached document]

Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

Grange Primary School can also expand, though this school is also not well related to the proposed allocations or future directions of growth.

Paragraphs 37 and 38 of the National Planning Policy Framework reflect the need to minimise the length of journeys to school and, for major developments, primary schools should be located within walking distance of most properties.

The best long term solution would be to reserve 2.2ha land for a new 315-place primary school and early years setting in a location which is well related to housing growth. This would also enable provision to be made for future growth, with another school capable of expansion.

Options for reserving land for a new primary school include:

- Land within 'Land North of Walton High Street'
- Land within another one of the Trimley sites
- Land in another location in the Trimleys, well related to sustainable travel routes and the new housing.

Secondary and Sixth Form Education

Based on standard pupil multipliers, development of 1,135 dwellings would be expected to generate an additional 204 secondary school pupils and an additional 45 sixth formers.

Felixstowe and the Trimleys are served by Felixstowe Academy. Based on the forecast below, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from the development proposed in this Plan.

[see table in attached document]

All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

Health, Wellbeing and Social Care

A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

C - 7615 - 2581 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7615 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

- * Ferry Road opposite site 502E
- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-

C - 7615 - 2581 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7615 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

* FPP4 Walton - Field evaluation has identified an Early-Middle Bronze Age funerary landscape across the site, with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.

Change to Plan

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot Specified

Attachments:

Kirton Sites FZ.pdf 2015-11-23 Felixstowe AAP_SCC Final Response.pdf Felixstowe Sites SW.pdf Felixstowe Sites FZ.pdf Kirton Sites SW.pdf

C - 7665 - 2581 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7665 Comment

Housing Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text: Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

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Comments are set out below, under service headings.

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Comment - Supporting Text

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Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

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Education

C - 7665 - 2581 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7665 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

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The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

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In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

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Primary Education

The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7665 - 2581 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7665 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

[see table in attached document]

Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

Grange Primary School can also expand, though this school is also not well related to the proposed allocations or future directions of growth.

Paragraphs 37 and 38 of the National Planning Policy Framework reflect the need to minimise the length of journeys to school and, for major developments, primary schools should be located within walking distance of most properties.

The best long term solution would be to reserve 2.2ha land for a new 315-place primary school and early years setting in a location which is well related to housing growth. This would also enable provision to be made for future growth, with another school capable of expansion.

Options for reserving land for a new primary school include:

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Secondary and Sixth Form Education

Based on standard pupil multipliers, development of 1,135 dwellings would be expected to generate an additional 204 secondary school pupils and an additional 45 sixth formers.

Felixstowe and the Trimleys are served by Felixstowe Academy. Based on the forecast below, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from the development proposed in this Plan.

[see table in attached document]

All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

Health, Wellbeing and Social Care

A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

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The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

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7665 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

- * Ferry Road opposite site 502E
- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-

C - 7665 - 2581 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7665 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

Archaeology. For the majority of sites, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies in line with NPPF. Although the significance of other sites and potential for encountering assets that may require preservation in situ is not lessened, sites identified at policies FPPP4 and FPPP6 have particular considerations at this stage.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

2015-11-23 Felixstowe AAP_SCC Final Response.pdf Kirton Sites FZ.pdf Felixstowe Sites FZ.pdf Kirton Sites SW.pdf Felixstowe Sites SW.pdf

C - 7667 - 2581 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7667 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text: Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

- * FPP4 Walton Field evaluation has identified an Early-Middle Bronze Age funerary landscape across the site, with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.
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Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7667 - 2581 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7667 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

Early Education

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The Government has indicated that it will legislate to double the number of hours' free childcare to 30. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

- In the Trimleys, developer contributions have already been secured to help manage the existing deficit in Early Years places and proposals are being drawn up to deliver additional places. Further development of the scale proposed (530 dwellings) will necessitate significant additional provision. Under current statutory arrangements, this would necessitate 53 additional places. When Land North of Walton High Street (400 dwellings) is included, the number of places required under current arrangements would increase to 93.

The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

- Development in the remainder of Felixstowe (150 dwellings North of Conway Close and 40 dwellings at Sea Road) can be managed by expanding existing settings.
- At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

The County Council would appreciate consideration of ways in which this policy could be more supportive of early education in retail centres, as part of a balanced policy which also protects the vitality and viability of retail centres. Policy FPP17 appears to implicitly support early education already, and discussion with the District Council may conclude that this policy is sufficient.

Primary Education

The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

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C - 7667 - 2581 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7667 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

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Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

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[see map in attached document]

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C - 7667 - 2581 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7667 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

Floods-Planning-protocol-Version-12.pdf

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[see attached document fo appendix]

Summary:

Field evaluation has identified and Early-Middle Bronze Age funerary landscape across the site with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Felixstowe Sites FZ.pdf
Kirton Sites SW.pdf
Felixstowe Sites SW.pdf
Kirton Sites FZ.pdf
2015-11-23 Felixstowe AAP_SCC Final Response.pdf

C - 7680 - 2581 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7680 Comment

Housing Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text: Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

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Comment - Site allocations

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Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7680 - 2581 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7680 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

Early Education

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The Government has indicated that it will legislate to double the number of hours' free childcare to 30. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

- In the Trimleys, developer contributions have already been secured to help manage the existing deficit in Early Years places and proposals are being drawn up to deliver additional places. Further development of the scale proposed (530 dwellings) will necessitate significant additional provision. Under current statutory arrangements, this would necessitate 53 additional places. When Land North of Walton High Street (400 dwellings) is included, the number of places required under current arrangements would increase to 93.

The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

- Development in the remainder of Felixstowe (150 dwellings North of Conway Close and 40 dwellings at Sea Road) can be managed by expanding existing settings.
- At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

The County Council would appreciate consideration of ways in which this policy could be more supportive of early education in retail centres, as part of a balanced policy which also protects the vitality and viability of retail centres. Policy FPP17 appears to implicitly support early education already, and discussion with the District Council may conclude that this policy is sufficient.

Primary Education

The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7680 - 2581 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7680 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

[see table in attached document]

Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

Grange Primary School can also expand, though this school is also not well related to the proposed allocations or future directions of growth.

Paragraphs 37 and 38 of the National Planning Policy Framework reflect the need to minimise the length of journeys to school and, for major developments, primary schools should be located within walking distance of most properties.

The best long term solution would be to reserve 2.2ha land for a new 315-place primary school and early years setting in a location which is well related to housing growth. This would also enable provision to be made for future growth, with another school capable of expansion.

Options for reserving land for a new primary school include:

- Land within 'Land North of Walton High Street'
- Land within another one of the Trimley sites
- Land in another location in the Trimleys, well related to sustainable travel routes and the new housing.

Secondary and Sixth Form Education

Based on standard pupil multipliers, development of 1,135 dwellings would be expected to generate an additional 204 secondary school pupils and an additional 45 sixth formers.

Felixstowe and the Trimleys are served by Felixstowe Academy. Based on the forecast below, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from the development proposed in this Plan.

[see table in attached document]

All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

Health, Wellbeing and Social Care

A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

C - 7680 - 2581 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7680 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

- * Ferry Road opposite site 502E
- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-

C - 7680 - 2581 - Preferred Policy FPP4: Land north of Walton High Street, Felixstowe - None

7680 Comment

Housing

Preferred Policy FPP4: Land north of Walton High Street. Felixstowe

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

FPP4 Transport Access and Traffic Issues. 400 units. Access acceptable, to included Candlet Road - High Street link. Has been subject of earlier application which included detailed survey and transport assessment. Likely to have impact on A14 so Highways England involvement required. Other detailed comments provided under headings sustainability (public rights of way) and collision history. Further detailed information provided on potential mitigation schemes.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Felixstowe Sites SW.pdf 2015-11-23 Felixstowe AAP_SCC Final Response.pdf Kirton Sites SW.pdf Kirton Sites FZ.pdf Felixstowe Sites FZ.pdf

O - 6854 - 3830 - Sustainability Appraisal Information - None

6854 Object

Housing Sustainability Appraisal Information

Respondent: Mr phil aldridge [3830] Agent: N/A

Full Text: I am a disabled/visually impaired person who is a member and user regularly of Felixstowe Rifle Club. I can only gain

access by public transport and feel that the proposed plan to move the club from its current location to a site off of Cordys Lane would be inaccessible to me and many others, ie. The blind/visually impaired, physically disabled and other disabled people due to the lack of public transport, where at the club's current location there are bus stops on

either side of the road and the new road crossing making easy access to the clubs current site.

Summary: I am a disabled/visually impaired person who is a member and user regularly of Felixstowe Rifle Club. I can only gain

access by public transport and feel that the proposed plan to move the club from its current location to a site off of Cordys Lane would be inaccessible to me and many others, ie. The blind/visually impaired, physically disabled and other disabled people due to the lack of public transport, where at the club's current location there are bus stops on

either side of the road and the new road crossing making easy access to the clubs current site.

Change to Plan To leave Felixstowe Rifle Club where it is.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6586 - 3203 - 3.39 - None

6586 Object

Housing 3.39

Respondent: Dave Norman [3203] Agent: N/A

Full Text: What planet are you on? Of course it will create a detrimental impact on a rural outlook. As a regular sailor on the River

Deben, it will also mar the AONB irretrievably.

Summary: What planet are you on? Of course it will create a detrimental impact on a rural outlook. As a regular sailor on the River

Deben, it will also mar the AONB irretrievably.

Change to Plan This site should not be included in the AAP.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6591 - 1703 - 3.39 - None

6591 Object

Housing 3.39

Respondent: mr ian buxton [1703] Agent: N/A

Full Text: This should be considered in conjunction with an adjacent site that SCDC gave outline planning permission in 2014. It is

not acceptable to have such a piecemeal planning policy. Despite the fine words in 3.39 - 3.46 they will be worthless when a developer says 'you allowed totally out of character development on the adjacent site -why not here? No doubt

SCDC will argue that its too late. It makes a mockery of what this plan is trying to do.

Summary: This should be considered in conjunction with an adjacent site that SCDC gave outline planning permission in 2014. It is

not acceptable to have such a piecemeal planning policy. Despite the fine words in 3.39 - 3.46 they will be worthless when a developer says 'you allowed totally out of character development on the adjacent site -why not here? No doubt

SCDC will argue that its too late. It makes a mockery of what this plan is trying to do.

Change to Plan Treat both sites as one for planning purposes - they have similar impacts and therefore a much better and cost effective

approach would be to get developers to meet the cost of infrastructure once.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6722 - 3749 - 3.39 - None

6722 Object

Housing 3.39

Respondent: Mr Robert Whitehouse [3749] Agent: N/A

Full Text: This is not, in any sense, a "natural" extension to the existing built-up land of Felixstowe. It is only adjacent to the

existing Built-Up Area along one edge (out of 4). Using this logic, any plot that is adjacent to the existing Built-Up Area could be allocated. Building on this site impinges greatly on the AONB. There are many other sites around the existing perimeter of Felixstowe that would have a much lower (or zero) impact. Gulpher Rd is just about the only "country lane" that we have remaining at the southern end of the peninsula and provides a much needed recreational resource for

walkers, cyclists, joggers, horse riders etc. Please do not allow any further development in this area.

Summary: This is not, in any sense, a "natural" extension to the existing built-up land of Felixstowe. Using this logic, any plot that is

adjacent to the existing Built-Up Area could be allocated. There are many other sites around the existing perimeter of Felixstowe that would have a much lower (or zero) impact. Gulpher Rd is just about the only "country lane" that we have remaining near Old Felixstowe and provides a much needed recreational resource for walkers, cyclists, joggers,

horse riders etc.

Change to Plan Substitute ...

"The land to the north of Conway Close does not provide a natural extension ..."

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6768 - 3060 - 3.39 - None

6768 Comment

Housing 3.39

Respondent: Felixstowe Town Council (Mr Ash Tadjrishi) [3060] Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Preferred Options Consultation

Thank you for the opportunity to respond to the Suffolk Coastal District Council Felixstowe Peninsula Area Action Plan Preferred Options paper. The Town Council considered this matter at its meeting of 11 November 2015.

Felixstowe Town Council was pleased to welcome and endorse the Felixstowe Peninsula Area Action Plan Preferred Options, subject to the following comments:

Page 13, Para. 2.02

We recommend adding the following to the end of the final sentence of this paragraph: ", as required by the July 2013 Local Plan."

Page 24, FPP3

Remove "(for residents and visitors)" from the bottom bullet relating to appropriate parking provision.

Page 26, Para. 3.30

This paragraph has been reduced in scope from an earlier draft and no longer references the unique location this site holds as a gateway to Felixstowe. It is vital that the policy ensures that any proposals for development of this site include appropriate consideration for this gateway and the statement this makes to those arriving to Felixstowe by road.

Page 27, FPP4

Remove "and Candlet Road" from the first bullet point. Any business units for this site should be restricted to the land adjacent to the A14 Dock Spur only.

Page 27, Title of 3.39

The title should read "Land" rather than "Lane" and include Swallow Close.

Page 29, FPP5

Please include Swallow Close and refer to this site as the "Land north of Conway Close and Swallow Close" throughout.

Page 49, Para. 5.06

Given the latest available information on these sites, this paragraph should be removed.

Page 50, Inset Map

The secondary shopping frontage should continue along Bent Hill on both sides of the road. It should also include the frontage of Trinity Methodist Church on Hamilton Road for consistency. Likewise the primary shopping area shaded in green should include this same section.

Page 51, Para. 5.10

Sentence should end "other than town centre uses".

Page 51, Para. 5.12

Please amend the final two sentences to read as follows:

"The scheme was not completed between Orwell Road and Bent Hill and the AAP will seek to encourage the continuation of the Shared Space along Hamilton Road. The completion of this scheme within the town centre boundary will provide a continuous link between Hamilton Road and Bent Hill and reinforce the connections between the town centre and the sea front."

Page 54, FPP15

Please amend the first paragraph to read "Any change of use proposals in this area should seek to retain a high proportion of retail activity."

Page 68, FPP21

Correction: "The provision of beach huts will be limited to those which currently exist. Any increased provision will be directed towards other parts of the sea front (namely Felixstowe Ferry Golf Club to Cobbolds Point Preferred Policy FPP19) as appropriate."

Page 74, FPP24

The policy should open with the following opening sentence:

"The need to strengthen Felixstowe as a seaside destination is recognised."

The next sentence should read: "Holiday accommodation will be encouraged and supported"

Page 82, FP27

This should be titled FPP27 rather than FP27.

C - 6768 - 3060 - 3.39 - None

6768 Comment

Housing 3.39

Please revise the first line of text to read "Spa Gardens and Town Hall Gardens".

Appendix 7:Felixstowe, Trimley St. Mary & Trimley St. Martin Inset Map.

The Physical Limits boundary in regard to the seaward boundary should be drawn as in the seaward should be drawn as in the seaward below the seaward by the seaward below the seaward by the s

The Physical Limits boundary in regard to the seaward boundary should be drawn as in the 2001 Local Plan map - i.e disappear in to the sea rather than be drawn along the low water mark.

The dotted blue line denoting Proposed Tourism Areas is misleading and these areas should be marked out to define the landward extent and total area covered by those corresponding policies. Landguard peninsula should also be encapsulated whereas the line appears to end at Landguard point. As above, the lines between the areas should simply stop at the sea. The extensions of those lines into the sea can be wrongly interpreted as representing a policy as applying to an element of the sea.

The port area should be included within the Physical Limits boundary as is the case in the 2001 Local Plan map. The Physical Limits boundary in the Manor End area should include the caravan parks and Custom House, terminating at the boundary of Landguard Common.

The colouring of some of the designations on the main map are confusingly similar, notably those for the Proposed District Centre, the District Centre boundary and the revised Physical Limits boundary. Also, the use of very heavy lines at the scale of the main map is unhelpful.

Notwithstanding these observations, thank you for the opportunity to have been consulted. The Town Council looks forward to receiving information on the further development of the Area Action Plan.

Summary: Page 27, Title of 3.39

The title should read "Land" rather than "Lane" and include Swallow Close.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

AAP Preferred Options Consultation Response.pdf

O - 6839 - 3319 - 3.39 - None

6839 Object

Housing 3.39

Respondent: Mr Christopher Harrison [3319] Agent: N/A

Full Text: Felixstowe Peninsular Area Action Plan.

I would like to take issue with several sections of the Felixstowe Peninsular Area Action Plan mostly in connection with the development of the land in Ferry Road (OUT DC/13/3069/OUT) and Conway Close (502e).

Section 2.11 Objective 1:To meet the housing needs of the Felixstowe Peninsula through an appropriate mix of house types for younger generations and the growing population with a particular emphasis on provision of affordable housing

Your plan quotes the 2011 Census for the increase in the population in Felixstowe but fails to take into consideration the age of the population and the occupancy of the properties.(All available from the census.) There is an urgent need for bungalows (medium size,2/max.3 bedroom with very small plots) in the Felixstowe area sort by the increasing elderly Felixstowe residents who want to remain independent and not wishing to go down the line of residential apartments. At the present time a presentable bungalow in and around Felixstowe attract the same price as 3/4 detached houses so there appears little incentive or opportunity for the numerous single or dual occupants of these properties to move, which would free up the housing market-couples with families moving up leaving the smaller properties for first time buyers -not buy to let!

As the government policy appears to be "care in the community", bungalows are another way to help the increasing elderly population in Felixstowe manage this.

Affordable housing - this appears from my experience of your planning meetings, a complete farce as you can not enforce it and many developers change their minds after building consent has been granted.

Sustainabity Appraisal.

- 7. To meet the housing requirements of the whole community,
- 10. To maintain and where possible improve air quality,
- 11. To conserve soil resources and quality,
- 14. To reduce the effects of traffic on the environment,
- 16. To reduce vulnerability to flooding,
- 19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.

With reference to the Sustainability Appraisal, they do not appear to have been considered in relation to the developments to Conway Close (502e) and Ferry Road DC/13/3069/OUT).

- 7. What about elderly population in Felistowe?
- 14. Traffic- Gulpher Road is deemed a "quiet road"! Ferry Road/ Colneis Road 500+ cars and service vehicles!
- 16. Both sites will flood onto the surrounding areas and the roads have no drainage!
- 19. Despite what has been stated both these developments will have an impact and effect on the Area of Outstanding Natural Beauty (AONB).

FPP5 Conway Close (502e)

There appears to be a degree of hypocrisy and lack of consistency on behalf of SCDC Planning department's contribution to this section when compared with the permission granted under DC/13/3069/OUT Ferry Road.

- 3.39 This is only a natural extension to Felixstowe because of the permission relating to DC/13/3069/OUT and despite the statement it will cause visual impact from the AONB.
- 3.40 Why was no condition of height imposed on DC/13/3069/OUT 2 1/2 storey houses are effectively 3 storey which are not in keeping with the adjacent area especially with Brinkley way being the "ribbon" behind Westmoreland Road/Rushmeadow Way. The density of both sites exceeds your own core strategy document of 35 houses per hectare not to mention that density far exceeds the adjacent areas.
- 3.41 No provision other than small green areas for open spaces on DC/13/3069/OUT.
- 3.42 No sympathetic design on the edge of DC/13/3069/OUT- just 2 1/2 storey houses which will be seen from Felixstowe Ferry.
- 3.43 No consideration for Wildlife under DC/13/3069/OUT -we have bats /kestrels regularly feeding in the area.

O - 6839 - 3319 - 3.39 - None

6839 Object

Housing 3.39

3.44 This is the only common clause - as previously stated the sites will need some form of road drainage as at present the culvert at the junction of Marsh Lane/Ferry Road drains to the ditches on to the Kingsfleet course of Felixstowe Ferry Golf course.

3.45 This area cannot accommodate 500+ cars and service vehicles not only in the immediate area but onwards to the A14. If the development of the land "North of High Street, Walton" is permitted with access to Candelet Road then Felixstowe will become gridlocked especially with your plan identifying potential new jobs at the port.

In the Area action Plan, you mention the re-opening of the Spa Pavilion yet in your parking provisions you have not made recommendations for parking there - remember the elderly population whom are likely to be needed to support it in the future months.

Summary:

This is only a natural extension to Felixstowe because of the permission relating to DC/13/3069/OUT and despite the statement it will cause visual impact from the AONB.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6853 - 1641 - 3.39 - None

6853 Object

Housing 3.39

N/A Respondent: Mr Alan Muchal [1641] Agent:

Full Text:

I object to building on the land to the north of Conway Close because Gulpher Road and the eastern leg of Ferry Road are Felixstowe's only quiet country lanes enjoyed by walkers, cyclists, and horse riders. Ferry Road/Gulpher Road is narrow and twisting and will already be under pressure from new housing agreed to the rear of Estuary Drive. This development would effectively put an end to its current character and the traffic generated would be a danger to itself and other users. Developing this area could also potentially open the door to future development of the whole area between Upperfield Drive and Gulpher Rd which would change this part of Felixstowe completely. It is vitally important to maintain a buffer zone between the built up area and the AONB.

Yours sincerely

Alan Muchal

Summary:

Object. Gulpher Road is Felixstowe's only quiet country lanes enjoyed by walkers, cyclists, and horse riders. Ferry Road/Gulpher Road is narrow and twisting. Already under pressure from new housing agreed to the rear of Estuary Drive. Development would end to its current character. Traffic generated would be a danger to itself and other users. Development could also open the door to future development of the whole area between Upperfield Drive and Gulpher Rd which would change this part of Felixstowe completely. It is vitally important to maintain a buffer zone between the

built up area and the AONB.

Change to Plan Abandon proposal

Sound? **Duty to Cooperate? Soundness Tests** Appear at exam? Legal?

Not Specified Not Specified Not Specified Not Specified None

O - 7085 - 3894 - 3.39 - None

7085 Object

Housing 3.39

Respondent: Mr Richard Burrow [3894] Agent: N/A

Full Text:

Having read the Felixstowe Peninsula Area Action Plan I am pleased with much of the content in that many of the environmental issues have been identified. However, I disagree with the assumption that the town's growth is inevitable at the expense of greenfield sites and extra burdens on the sewage and highways networks. There is mention of 'organic growth'; the plans go far beyond this. Here are my observations:

- 3.01 There is a reference to the need for 807 new homes for the peninsula. How has this demand been identified? Is there actually a growing population or is valuable farmland and countryside being sacrificed to artificially create a demand for new housing for the benefit of developers? With Felixstowe's specific demographic, there is a natural turnover of the different types of housing as residents move through the different phases of their lives e.g. downsizing through retirement or infirmity, meaning that properties are regularly becoming available (with the possible exception of affordable homes for purchase by first time buyers).
- 3.27 The area between the A14 Spur, Candlet Road and High Street, Walton is valuable and productive farmland and effectively constitutes a green belt in all but name between the Trimleys and Walton. The suggested development would change the rural nature of the approach to Felixstowe and further urbanise Candlet Road, particularly with the planned new road junction. I feel strongly that it should remain as farmland. The same argument applies to the other large greenfield sites identified, Poultry and Mill farms.
- 3.39 Development of this site to the north of Conway Close will contribute to the spread of the town into open countryside as well as causing ribbon development along Ferry Road. The fears that new housing in this area will impinge on Gulpher Lane in terms of traffic are very real; Colneis Road will definitely suffer increased vehicle use. This rural fringe of Old Felixstowe is picturesque and should be protected, in my opinion.
- 6.0 There is no mention in the document of the contribution of sea angling to the local economy, a strange omission for a town with a long tradition of fishing. I fish the local beaches twice a week on average and am impressed by how far visiting anglers travel to our shores. Perhaps there should be some appropriate signage identifying suitable fishing areas, launching sites, species with size limits etc. and the provision of vantage points for disabled anglers could be a possibility. Measures to promote such a healthy outdoor activity could be very beneficial to Felixstowe. Any putative redevelopment of the pier could have some planning requirements encouraging the attachment of a fishing jetty-Southwold Pier was built with this feature as part of the design.
- 6.34/ 6.35 Many vehicle enthusiasts see Felixstowe as destination of choice. The local plan could incorporate provision in the form of a designated sea front space (a car park on other days) that is bookable by, for example, classic car or motorcycle clubs, scooter enthusiasts etc. This would serve such organisations with the bonus of providing additional attractions for both visitors and residents in a regulated environment.

Summary:

Development of this site to the north of Conway Close will contribute to the spread of the town into open countryside as well as causing ribbon development along Ferry Road. The fears that new housing in this area will impinge on Gulpher Lane in terms of traffic are very real; Colneis Road will definitely suffer increased vehicle use. This rural fringe of Old Felixstowe is picturesque and should be protected, in my opinion.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7504 - 1502 - 3.39 - None

7504 Object

Housing 3.39

Respondent: Mr / Mrs C R Bingham [1502] N/A Agent:

Full Text: The statement that development can provide a natural extension to existing properties will stand or fall on two (2)

factors, namely

(a) Sewerage provision and (b) Traffic management

The first, according to original residents (yes! there are some left) caused endless problems in the early days and

believe what the whole system may not be fit for purpose.

Secondly the proposed site is enclosed by roads, so narrow that two small cars can barely pass and certainly not where parking is rife during school term (Kingsfleet). Should buildings proceed we fear that heavy vehicular traffic will use our road causing widespread noise, dirt and disturbance. Another effect could well be impassé + gridlock.

Finally as the site opposite to the east of Ferry Road has bee rejected for housing development why would the current

site be regarded as acceptable?

Summary: The statement that development can provide a natural extension to existing properties will stand or fall on two factors

The first, according to original residents, caused endless problems in the early days and believe what the whole system

may not be fit for purpose.

Secondly the proposed site is enclosed by roads, so narrow that two small cars can barely pass and certainly not where parking is rife during school term (Kingsfleet). Should buildings proceed we fear that heavy vehicular traffic will use our

road causing widespread noise, dirt and disturbance. Another effect could well be impassé + gridlock.

Change to Plan

Soundness Tests Sound? **Duty to Cooperate?** Appear at exam? Legal? Not Specified Not Specified None

Not Specified Not Specified

O - 7529 - 4037 - 3.39 - None

7529 Object

Housing 3.39

Respondent: Ruth Thurston [4037] Agent: N/A

Full Text: Paragraph 1

Most of the residents of Upperfield Drive bungalow area are elderly and an increased amount of traffic will be dangerous and unpleasant. The number of properties is large and does not have enough diversity. There should be a smaller number and more old people / social housing for young couples.

Paragraph 3

It may be better to come into the area at the back of Links Avenue along Grove Lane beyond the new Doctors surgery and build a ribbon development parallel to Links Avenue / Upperfield Drive and fill in that area so that traffic can go into Grove Road and link with Beatrice Avenue roundabout. This would be more central for people's new homes.

The area around Kingsfleet School is already dangerous and congested at 9 & 3pm. Extra traffic would make this even more hazardous.

Summary:

Most of the residents of Upperfield Drive bungalow area are elderly and an increased amount of traffic will be dangerous and unpleasant. The number of properties is too large and does not have enough diversity. There should be a smaller number and more old people / social housing for young couples.

* The area around Kingsfleet School is already dangerous and congested at 9 & 3pm. Extra traffic would make this even more of a hazard

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot Specified

O - 6840 - 3319 - 3.40 - None

6840 Object

Housing 3.40

Respondent: Mr Christopher Harrison [3319] Agent: N/A

Full Text: Felixstowe Peninsular Area Action Plan.

I would like to take issue with several sections of the Felixstowe Peninsular Area Action Plan mostly in connection with the development of the land in Ferry Road (OUT DC/13/3069/OUT) and Conway Close (502e).

Section 2.11 Objective 1:To meet the housing needs of the Felixstowe Peninsula through an appropriate mix of house types for younger generations and the growing population with a particular emphasis on provision of affordable housing

Your plan quotes the 2011 Census for the increase in the population in Felixstowe but fails to take into consideration the age of the population and the occupancy of the properties.(All available from the census.) There is an urgent need for bungalows (medium size,2/max.3 bedroom with very small plots) in the Felixstowe area sort by the increasing elderly Felixstowe residents who want to remain independent and not wishing to go down the line of residential apartments. At the present time a presentable bungalow in and around Felixstowe attract the same price as 3/4 detached houses so there appears little incentive or opportunity for the numerous single or dual occupants of these properties to move, which would free up the housing market-couples with families moving up leaving the smaller properties for first time buyers -not buy to let!

As the government policy appears to be "care in the community", bungalows are another way to help the increasing elderly population in Felixstowe manage this.

Affordable housing - this appears from my experience of your planning meetings, a complete farce as you can not enforce it and many developers change their minds after building consent has been granted.

Sustainabity Appraisal.

- 7. To meet the housing requirements of the whole community,
- 10. To maintain and where possible improve air quality,
- 11. To conserve soil resources and quality,
- 14. To reduce the effects of traffic on the environment,
- 16. To reduce vulnerability to flooding,
- 19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.

With reference to the Sustainability Appraisal, they do not appear to have been considered in relation to the developments to Conway Close (502e) and Ferry Road DC/13/3069/OUT).

- 7. What about elderly population in Felistowe?
- 14. Traffic- Gulpher Road is deemed a "quiet road"! Ferry Road/ Colneis Road 500+ cars and service vehicles!
- 16. Both sites will flood onto the surrounding areas and the roads have no drainage!
- 19. Despite what has been stated both these developments will have an impact and effect on the Area of Outstanding Natural Beauty (AONB).

FPP5 Conway Close (502e)

There appears to be a degree of hypocrisy and lack of consistency on behalf of SCDC Planning department's contribution to this section when compared with the permission granted under DC/13/3069/OUT Ferry Road.

- 3.39 This is only a natural extension to Felixstowe because of the permission relating to DC/13/3069/OUT and despite the statement it will cause visual impact from the AONB.
- 3.40 Why was no condition of height imposed on DC/13/3069/OUT 2 1/2 storey houses are effectively 3 storey which are not in keeping with the adjacent area especially with Brinkley way being the "ribbon" behind Westmoreland Road/Rushmeadow Way. The density of both sites exceeds your own core strategy document of 35 houses per hectare not to mention that density far exceeds the adjacent areas.
- 3.41 No provision other than small green areas for open spaces on DC/13/3069/OUT.
- 3.42 No sympathetic design on the edge of DC/13/3069/OUT- just 2 1/2 storey houses which will be seen from Felixstowe Ferry.
- 3.43 No consideration for Wildlife under DC/13/3069/OUT -we have bats /kestrels regularly feeding in the area.

O - 6840 - 3319 - 3.40 - None

6840 Object

Housing 3.40

3.44 This is the only common clause - as previously stated the sites will need some form of road drainage as at present the culvert at the junction of Marsh Lane/Ferry Road drains to the ditches on to the Kingsfleet course of Felixstowe Ferry Golf course.

3.45 This area cannot accommodate 500+ cars and service vehicles not only in the immediate area but onwards to the A14. If the development of the land "North of High Street, Walton" is permitted with access to Candelet Road then Felixstowe will become gridlocked especially with your plan identifying potential new jobs at the port.

In the Area action Plan, you mention the re-opening of the Spa Pavilion yet in your parking provisions you have not made recommendations for parking there - remember the elderly population whom are likely to be needed to support it in the future months.

Summary:

Why was no condition of height imposed on DC/13/3069/OUT 2 1/2 storey houses are effectively 3 storey which are not in keeping with the adjacent area especially with Brinkley way being the "ribbon" behind Westmoreland Road/Rushmeadow Way. The density of both sites exceeds your own core strategy document of 35 houses per hectare - not to mention that density far exceeds the adjacent areas.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 6920 - 1968 - 3.40 - None

6920 Comment

Housing 3.40

Respondent: R Wood [1968] Agent: N/A

Full Text: If this development goes ahead I agee with this statement, but it follows that the neighbouring development

DC/13/3069/OUT should also be 1 or 2 storey in keeping with the low rise nature of the area. There was overwhelming public opposition at the time of passing outline planning permission for DC/13/3069/OUT because it was proposed as a

high density development with 3 storey units, totally out of keeping with the area.

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Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7093 - 3895 - 3.40 - None

7093 Comment

Housing 3.40

Respondent: Ms C.H Haniford [3895] Agent: N/A

Full Text:

Comments on the Felixstowe Peninsula Area Action Plan

Para 3.0 Housing 3.28 & 3.29 Air Quality. How necessary would it be to have business units here? It's quite close to the proposed Strategic Employment area. There could be a risk of further pollution from some activities. Why not create a small shopping area?

SHLAA ref 451g

3.31 Is this to be high density housing?

3.32 Candlet Road is already unable to cope with traffic in the morning & evening rush hours - how would you improve this situation by the additional traffic from the proposed development? Would you introduce a cycle route to the Strategic Employment Area?

3.35 Access for walkers should continue across Candlet Road - perhaps a pedestrian bridge would ease safety concerns.

3.36 Anglia Water have commented here and elsewhere on the pressure on their network - what is to be done about this?

page 28 3.40, 3.41, 3.44 Density on this proposed site appears to be greater than on the adjoining site i.e. you propose 150 dwellings and the adjacent area of a similar size contains 32 dwellings. How necessary is it to create such a high density development in this area?

& page 29 3.45 The access to this site could be problematic as Gulpher Road is narrow and rural with several awkward bends, which is quite manageable when it's quiet, however a major (potential) increase could create unnecessary pollution and vehicular hazards.

SHLAA Ref 502e Overall Assessment The site can hardly be described as "central". Nor is it particularly close to "key services", unless you have transport, good mobility or no children.

4.0 Employment 4.04 Regarding rail services: there appears to be a conflict of interests between the needs of passengers and those of the port (and its less polluting mode of transportation of their containers) - what is to be done? Better and more reliable links for passengers would benefit tourism from further afield as well as better access for local people wishing to use the trains for long distance travel.

5.0 Retail FPP 14 p.52 Shared Space scheme - has there been any evidence gathered on how this is working out? Are there any proposals to limit access at Weekends?

6.0 Tourism & Sea Front p.71 Car Parking - on the day of 'Art on the Prom' there were half empty car parks and overflowing pavements in nearby streets, such as Princes Road and Queens Road. This often happens when there is a big event on the prom.

Summarv:

Density on this proposed site appears to be greater than on the adjoining site i.e. you propose 150 dwellings and the adjacent area of a similar size contains 32 dwellings. How necessary is it to create such a high density development in this area?

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6841 - 3319 - 3.41 - None

6841 Object

Housing 3.41

Respondent: Mr Christopher Harrison [3319] Agent: N/A

Full Text: Felixstowe Peninsular Area Action Plan.

I would like to take issue with several sections of the Felixstowe Peninsular Area Action Plan mostly in connection with the development of the land in Ferry Road (OUT DC/13/3069/OUT) and Conway Close (502e).

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Your plan quotes the 2011 Census for the increase in the population in Felixstowe but fails to take into consideration the age of the population and the occupancy of the properties.(All available from the census.) There is an urgent need for bungalows (medium size,2/max.3 bedroom with very small plots) in the Felixstowe area sort by the increasing elderly Felixstowe residents who want to remain independent and not wishing to go down the line of residential apartments. At the present time a presentable bungalow in and around Felixstowe attract the same price as 3/4 detached houses so there appears little incentive or opportunity for the numerous single or dual occupants of these properties to move, which would free up the housing market-couples with families moving up leaving the smaller properties for first time buyers -not buy to let!

As the government policy appears to be "care in the community", bungalows are another way to help the increasing elderly population in Felixstowe manage this.

Affordable housing - this appears from my experience of your planning meetings, a complete farce as you can not enforce it and many developers change their minds after building consent has been granted.

Sustainabity Appraisal.

- 7. To meet the housing requirements of the whole community,
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With reference to the Sustainability Appraisal, they do not appear to have been considered in relation to the developments to Conway Close (502e) and Ferry Road DC/13/3069/OUT).

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- 3.41 No provision other than small green areas for open spaces on DC/13/3069/OUT.
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- 3.43 No consideration for Wildlife under DC/13/3069/OUT -we have bats /kestrels regularly feeding in the area.

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O - 6841 - 3319 - 3.41 - None

6841 Object

Housing 3.41

3.44 This is the only common clause - as previously stated the sites will need some form of road drainage as at present the culvert at the junction of Marsh Lane/Ferry Road drains to the ditches on to the Kingsfleet course of Felixstowe Ferry Golf course.

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In the Area action Plan, you mention the re-opening of the Spa Pavilion yet in your parking provisions you have not made recommendations for parking there - remember the elderly population whom are likely to be needed to support it in the future months.

Summary: No provision other than small green areas for open spaces on DC/13/3069/OUT.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified Non

O - 6908 - 3234 - 3.41 - None

6908 Object

Housing 3.41

Respondent: Mrs Julie Cornforth [3234] Agent: N/A

Full Text: We have an "open space" here already. It's called Gulpher Road!

Why have you changed the town boundary to include

the only countryside road left in Walton/Old Felixstowe = Gulpher Road?

Summary: We have an "open space" here already. It's called Gulpher Road!

Why have you changed the town boundary to include

the only countryside road left in Walton/Old Felixstowe = Gulpher Road?

Change to Plan Why should we lose the only countryside lane left in Walton/Fxt. Leave it alone!

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6842 - 3319 - 3.42 - None

6842 Object

Housing 3.42

Respondent: Mr Christopher Harrison [3319] Agent: N/A

Full Text: Felixstowe Peninsular Area Action Plan.

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FPP5 Conway Close (502e)

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O - 6842 - 3319 - 3.42 - None

6842 Object

3.42 Housing

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3.45 This area cannot accommodate 500+ cars and service vehicles not only in the immediate area but onwards to the A14. If the development of the land "North of High Street, Walton" is permitted with access to Candelet Road then Felixstowe will become gridlocked especially with your plan identifying potential new jobs at the port.

In the Area action Plan, you mention the re-opening of the Spa Pavilion yet in your parking provisions you have not made recommendations for parking there - remember the elderly population whom are likely to be needed to support it in the future months.

Summary: No sympathetic design on the edge of DC/13/3069/OUT- just 2 1/2 storey houses which will be seen from Felixstowe

Change to Plan

Legal? Sound? **Duty to Cooperate?** Soundness Tests Appear at exam? Not Specified None

Not Specified Not Specified Not Specified

C - 7527 - 294 - 3.43 - None

7527 Comment

Housing 3.43

Respondent: Mrs J Catchpole [294] Agent: N/A

Full Text: FPP5 Preferred Policy - Land North of Conway Close, Felixstowe

We strongly object to this proposal for 150 houses on the land north of Conway Close / Swallow Close.

3.45

It cannot be emphasised more that to put more traffic from this proposed development + the planned development on the other side of the road will cause chaos on Ferry Road. There is already a problem with traffic there - the road is narrow, some of the road is a lane. Farm lorry's + other commercial vehicles already have problems getting down the road. There is a school on the corner with Colnels Road which is in a dangerous position. There is a church + community hall traffic which causes more problems. Gulphur Road is named as a quiet road by SCC. This will no longer be so as it will be used a short cut. Also Upperfield Drive, another very narrow road will be used by traffic.

3.44

There is already a problem with sewerage in this area - there is no facility for extra housing.

3.43

This development is proposed in an area of outstanding beauty. There are footpaths on this land which are enjoyed by walkers, cyclists etc. The whole area is one of the few accessible parts of countryside which the town has to offer, which can be walked on. The rest is private land. At present the lanes can be enjoyed by walkers etc, but this will not be possible when there will be so much extra traffic. This land is also good farming land which is always used for crops and will be needed in the future.

It cannot be stressed more that there are no amenities in this area. The site is a long way from the town - shops, train station + employment. The bus stop is a 15min-20min walk away + only comes once an hour and never on a Sunday.

Summary:

This development is proposed in an area of outstanding beauty. There are footpaths on this land which are enjoyed by walkers, cyclists etc. The whole area is one of the few accessible parts of countryside which the town has to offer, which can be walked on. The rest is private land. At present the lanes can be enjoyed by walkers etc, but this will not be possible when there will be so much extra traffic. This land is also good farming land which is always used for crops and will be needed in the future.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6585 - 3203 - 3.44 - None

6585 Object

Housing 3.44

Respondent: Dave Norman [3203] Agent: N/A

Full Text: Since the Outline consent for the 200 houses was granted, we have had several visits by a water jetting company to

deal with the already inadequate main sewer. On a recent visit, the manhole cover on our property was lifted without notification and without permission. I did speak to the operators who told me they had lifted as many as possible in our part fo Ferry Road to avoid back pressure build up to individual properties. I do understand this, but it highlights how inadequate the existing system is. Ferry Road has also been flooded twice this summer after heavy rain. Unless the developers are prepared to pay for a complete upgrade to the network this end of Felixstowe, no further development

should be permitted.

Summary: Several blockages/flooding in Ferry Road this year. Old, inadequate system. Developers must pay for new one

BEFORE any development permitted.

Change to Plan New mains sewerage system in Ferry Road.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6843 - 3319 - 3.44 - None

6843 Comment

Housing 3.44

Respondent: Mr Christopher Harrison [3319] Agent: N/A

Full Text: Felixstowe Peninsular Area Action Plan.

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C - 6843 - 3319 - 3.44 - None

6843 Comment

Housing 3.44

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In the Area action Plan, you mention the re-opening of the Spa Pavilion yet in your parking provisions you have not made recommendations for parking there - remember the elderly population whom are likely to be needed to support it in the future months.

Summary:

This is the only common clause - as previously stated the sites will need some form of road drainage as at present the culvert at the junction of Marsh Lane/Ferry Road drains to the ditches on to the Kingsfleet course of Felixstowe Ferry Golf course.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7526 - 294 - 3.44 - None

7526 Comment

Housing 3.44

Respondent: Mrs J Catchpole [294] Agent: N/A

Full Text: FPP5 Preferred Policy - Land North of Conway Close, Felixstowe

We strongly object to this proposal for 150 houses on the land north of Conway Close / Swallow Close.

3.45

It cannot be emphasised more that to put more traffic from this proposed development + the planned development on the other side of the road will cause chaos on Ferry Road. There is already a problem with traffic there - the road is narrow, some of the road is a lane. Farm lorry's + other commercial vehicles already have problems getting down the road. There is a school on the corner with Colnels Road which is in a dangerous position. There is a church + community hall traffic which causes more problems. Gulphur Road is named as a quiet road by SCC. This will no longer be so as it will be used a short cut. Also Upperfield Drive, another very narrow road will be used by traffic.

3.44

There is already a problem with sewerage in this area - there is no facility for extra housing.

3.43

This development is proposed in an area of outstanding beauty. There are footpaths on this land which are enjoyed by walkers, cyclists etc. The whole area is one of the few accessible parts of countryside which the town has to offer, which can be walked on. The rest is private land. At present the lanes can be enjoyed by walkers etc, but this will not be possible when there will be so much extra traffic. This land is also good farming land which is always used for crops and will be needed in the future.

It cannot be stressed more that there are no amenities in this area. The site is a long way from the town - shops, train station + employment. The bus stop is a 15min-20min walk away + only comes once an hour and never on a Sunday.

Summary:

There is already a problem with sewerage in this area - there is no facility for extra housing.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6590 - 1703 - 3.45 - None

6590 Object

Housing 3.45

Respondent: mr ian buxton [1703] Agent: N/A

Full Text: This site should be considered with the adjacent site as a cumulative site. This would ensure that all the infrastructure

issues Traffic, Sewage etc can be dealt with properly. By supporting this site it makes a mockery of a holistic planning approach. The danger is that when the 200 units some 3 storeys are built on the adjacent land this will form the de facto' standards that developers will argue 'you allowed it over the road, you cannot stop it here'. The problem is that no one trusts the planners any more. Most sensible people accept that more houses are needed but when development is approved that is completely out of character, ignores common sense traffic increases, underestimates the infrastructure

impact then the only thing left to do is to object.

Summary: Revise so that this site and the adjacent one are treated as a cumulative site.

Change to Plan Revise so that this site and the adjacent one are treated as a cumulative site.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6844 - 3319 - 3.45 - None

6844 Object

Housing 3.45

Respondent: Mr Christopher Harrison [3319] Agent: N/A

Full Text: Felixstowe Peninsular Area Action Plan.

I would like to take issue with several sections of the Felixstowe Peninsular Area Action Plan mostly in connection with the development of the land in Ferry Road (OUT DC/13/3069/OUT) and Conway Close (502e).

Section 2.11 Objective 1:To meet the housing needs of the Felixstowe Peninsula through an appropriate mix of house types for younger generations and the growing population with a particular emphasis on provision of affordable housing

Your plan quotes the 2011 Census for the increase in the population in Felixstowe but fails to take into consideration the age of the population and the occupancy of the properties.(All available from the census.) There is an urgent need for bungalows (medium size,2/max.3 bedroom with very small plots) in the Felixstowe area sort by the increasing elderly Felixstowe residents who want to remain independent and not wishing to go down the line of residential apartments. At the present time a presentable bungalow in and around Felixstowe attract the same price as 3/4 detached houses so there appears little incentive or opportunity for the numerous single or dual occupants of these properties to move, which would free up the housing market-couples with families moving up leaving the smaller properties for first time buyers -not buy to let!

As the government policy appears to be "care in the community", bungalows are another way to help the increasing elderly population in Felixstowe manage this.

Affordable housing - this appears from my experience of your planning meetings, a complete farce as you can not enforce it and many developers change their minds after building consent has been granted.

Sustainabity Appraisal.

- 7. To meet the housing requirements of the whole community,
- 10. To maintain and where possible improve air quality,
- 11. To conserve soil resources and quality,
- 14. To reduce the effects of traffic on the environment,
- 16. To reduce vulnerability to flooding,
- 19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.

With reference to the Sustainability Appraisal, they do not appear to have been considered in relation to the developments to Conway Close (502e) and Ferry Road DC/13/3069/OUT).

- 7. What about elderly population in Felistowe?
- 14. Traffic- Gulpher Road is deemed a "quiet road"! Ferry Road/ Colneis Road 500+ cars and service vehicles!
- 16. Both sites will flood onto the surrounding areas and the roads have no drainage!
- 19. Despite what has been stated both these developments will have an impact and effect on the Area of Outstanding Natural Beauty (AONB).

FPP5 Conway Close (502e)

There appears to be a degree of hypocrisy and lack of consistency on behalf of SCDC Planning department's contribution to this section when compared with the permission granted under DC/13/3069/OUT Ferry Road.

- 3.39 This is only a natural extension to Felixstowe because of the permission relating to DC/13/3069/OUT and despite the statement it will cause visual impact from the AONB.
- 3.40 Why was no condition of height imposed on DC/13/3069/OUT 2 1/2 storey houses are effectively 3 storey which are not in keeping with the adjacent area especially with Brinkley way being the "ribbon" behind Westmoreland Road/Rushmeadow Way. The density of both sites exceeds your own core strategy document of 35 houses per hectare not to mention that density far exceeds the adjacent areas.
- 3.41 No provision other than small green areas for open spaces on DC/13/3069/OUT.
- 3.42 No sympathetic design on the edge of DC/13/3069/OUT- just 2 1/2 storey houses which will be seen from Felixstowe Ferry.
- 3.43 No consideration for Wildlife under DC/13/3069/OUT -we have bats /kestrels regularly feeding in the area.

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

O - 6844 - 3319 - 3.45 - None

6844 Object

Housing 3.45

3.44 This is the only common clause - as previously stated the sites will need some form of road drainage as at present the culvert at the junction of Marsh Lane/Ferry Road drains to the ditches on to the Kingsfleet course of Felixstowe Ferry Golf course.

3.45 This area cannot accommodate 500+ cars and service vehicles not only in the immediate area but onwards to the A14. If the development of the land "North of High Street, Walton" is permitted with access to Candelet Road then Felixstowe will become gridlocked especially with your plan identifying potential new jobs at the port.

In the Area action Plan, you mention the re-opening of the Spa Pavilion yet in your parking provisions you have not made recommendations for parking there - remember the elderly population whom are likely to be needed to support it in the future months.

Summary:

This area cannot accommodate 500+ cars and service vehicles not only in the immediate area but onwards to the A14. If the development of the land "North of High Street, Walton" is permitted with access to Candelet Road then Felixstowe will become gridlocked especially with your plan identifying potential new jobs at the port.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6916 - 3234 - 3.45 - None

6916 Object

Housing 3.45

Respondent: Mrs Julie Cornforth [3234] Agent: N/A

Full Text: As well as a transport assessment on Gulpher Road, there would also need to be an assessment on the A1021.

According to the EADT 8th Sept 2015, the A1021 is one of the "region's 15 slowest council maintained A-roads during

morning rush-hour"

And that is before you build the 200 houses plus in Ferry Road.

Summary: As well as a transport assessment on Gulpher Road, there would also need to be an assessment on the A1021.

According to the EADT 8th Sept 2015, the A1021 is one of the "region's 15 slowest council maintained A-roads during

morning rush-hour"

And that is before you build the 200 houses plus in Ferry Road.

Change to Plan Think before you build 1000's of houses on Fxt's peninsula causing grid-lock in the town and surrounding roads.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6985 - 3872 - 3.45 - None

6985 Comment

Housing 3.45

Respondent: Mr Howard Price [3872] Agent: N/A

Full Text: It needs to be recognised that the Preferred Option site and the adjacent site mentioned here would, together, represent

a very significant increase in the size of the 'Old Felixstowe' neighbourhood. If Gulpher Rd remains (hopefully) a 'Quiet Lane', that can only result in significant additional traffic along Ferry Rd and either Colneis Rd or Church Rd, in both cases affecting existing primary schools and increasing noise. Contrary to the sustainability appraisal, the site is not close to any key services except those schools. It's difficult to understand how the loss of G1 agricultural land can be

mitigated.

Summary: It needs to be recognised that the Preferred Option site and the adjacent site mentioned here would, together, represent

a very significant increase in the size of the 'Old Felixstowe' neighbourhood. If Gulpher Rd remains (hopefully) a 'Quiet Lane', that can only result in significant additional traffic along Ferry Rd and either Colneis Rd or Church Rd, in both cases affecting existing primary schools and increasing noise. Contrary to the sustainability appraisal, the site is not close to any key services except those schools. It's difficult to understand how the loss of G1 agricultural land can be

mitigated.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7094 - 3895 - 3.45 - None

7094 Comment

Housing 3.45

Respondent: Ms C.H Haniford [3895] Agent: N/A

Full Text:

Comments on the Felixstowe Peninsula Area Action Plan

Para 3.0 Housing 3.28 & 3.29 Air Quality. How necessary would it be to have business units here? It's quite close to the proposed Strategic Employment area. There could be a risk of further pollution from some activities. Why not create a small shopping area?

SHLAA ref 451g

3.31 Is this to be high density housing?

3.32 Candlet Road is already unable to cope with traffic in the morning & evening rush hours - how would you improve this situation by the additional traffic from the proposed development? Would you introduce a cycle route to the Strategic Employment Area?

3.35 Access for walkers should continue across Candlet Road - perhaps a pedestrian bridge would ease safety concerns.

3.36 Anglia Water have commented here and elsewhere on the pressure on their network - what is to be done about this?

page 28 3.40, 3.41, 3.44 Density on this proposed site appears to be greater than on the adjoining site i.e. you propose 150 dwellings and the adjacent area of a similar size contains 32 dwellings. How necessary is it to create such a high density development in this area?

& page 29 3.45 The access to this site could be problematic as Gulpher Road is narrow and rural with several awkward bends, which is quite manageable when it's quiet, however a major (potential) increase could create unnecessary pollution and vehicular hazards.

SHLAA Ref 502e Overall Assessment The site can hardly be described as "central". Nor is it particularly close to "key services", unless you have transport, good mobility or no children.

4.0 Employment 4.04 Regarding rail services: there appears to be a conflict of interests between the needs of passengers and those of the port (and its less polluting mode of transportation of their containers) - what is to be done? Better and more reliable links for passengers would benefit tourism from further afield as well as better access for local people wishing to use the trains for long distance travel.

5.0 Retail FPP 14 p.52 Shared Space scheme - has there been any evidence gathered on how this is working out? Are there any proposals to limit access at Weekends?

6.0 Tourism & Sea Front p.71 Car Parking - on the day of 'Art on the Prom' there were half empty car parks and overflowing pavements in nearby streets, such as Princes Road and Queens Road. This often happens when there is a big event on the prom.

Summarv:

The access to this site could be problematic as Gulpher Road is narrow and rural with several awkward bends, which is quite manageable when it's quiet, however a major (potential) increase could create unnecessary pollution and vehicular hazards.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7525 - 294 - 3.45 - None

7525 Comment

Housing 3.45

Respondent: Mrs J Catchpole [294] Agent: N/A

Full Text: FPP5 Preferred Policy - Land North of Conway Close, Felixstowe

We strongly object to this proposal for 150 houses on the land north of Conway Close / Swallow Close.

3.45

It cannot be emphasised more that to put more traffic from this proposed development + the planned development on the other side of the road will cause chaos on Ferry Road. There is already a problem with traffic there - the road is narrow, some of the road is a lane. Farm lorry's + other commercial vehicles already have problems getting down the road. There is a school on the corner with Colnels Road which is in a dangerous position. There is a church + community hall traffic which causes more problems. Gulphur Road is named as a quiet road by SCC. This will no longer be so as it will be used a short cut. Also Upperfield Drive, another very narrow road will be used by traffic.

3.44

There is already a problem with sewerage in this area - there is no facility for extra housing.

3.43

This development is proposed in an area of outstanding beauty. There are footpaths on this land which are enjoyed by walkers, cyclists etc. The whole area is one of the few accessible parts of countryside which the town has to offer, which can be walked on. The rest is private land. At present the lanes can be enjoyed by walkers etc, but this will not be possible when there will be so much extra traffic. This land is also good farming land which is always used for crops and will be needed in the future.

It cannot be stressed more that there are no amenities in this area. The site is a long way from the town - shops, train station + employment. The bus stop is a 15min-20min walk away + only comes once an hour and never on a Sunday.

Summary:

There is already a problem with traffic on Ferry Road - the road is narrow, some of the road is a lane. Farm lorry's + other commercial vehicles already have problems getting down the road. There is a school on the corner with Colnels Road which is in a dangerous position. There is a church + community hall traffic which causes more problems. Gulphur Road is named as a quiet road by SCC. This will no longer be so as it will be used a short cut. Also Upperfield Drive, another very narrow road will be used by traffic.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6550 - 3664 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6550 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr Anthony Goodman [3664] Agent: N/A

Full Text: I strongly disagree with the action plan to build a minimum of 150 homes on the field north of Conway/Swallow close.

Not only would there be a significant high volume of traffic using Ferry rd. Ferry road simply isn't wide enough to cater for a possible 1000 extra cars. As for parents dropping children off at Kingsfleet school (Ferry rd) adding more homes

equals more traffic on a road already unable to cope with current traffic conditions in peak periods.

This area in question is enjoyed by cyclist, walkers, horse riders for its outstanding natural beauty . All this would be

threatened should any proposed plans get the go ahead.

STRONGLY DISAGREE.

Summary: I strongly disagree with the action plan to build a minimum of 150 homes on the field north of Conway/Swallow close.

Not only would there be a significant high volume of traffic using Ferry rd. Ferry road simply isn't wide enough to cater for a possible 1000 extra cars. As for parents dropping children off at Kingsfleet school (Ferry rd) adding more homes

equals more traffic on a road already unable to cope with current traffic conditions in peak periods.

This area in question is enjoyed by cyclist, walkers, horse riders for its outstanding natural beauty.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6552 - 3667 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6552 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr Terry Hazelwood [3667] Agent: N/A

Full Text: Dear Sirs

I refer to the attached Public Notice, regarding the action plan put forward to the residential development of a minimum

of 150 homes

North of Conway Close/Swallow Close.

I've lived in this area all my life (Marsh Lane & Ferry Road) and It would be totally inadequate for this type of

development

for a number of reasons.

Ferry Road is very narrow and it would struggle to handle the additional 1000 car movements a day, causing traffic

chaos.

I understand the site would suffer from an exhausted sewerage system, causing problems for existing households

unless a new pumping station is provided.

It would be some way from the main employment area (The Port) and therefore not fall in with the Councils stated policy

of encouraging walking and cycling from its new housing developments.

The field borders an area of Outstanding Natural Beauty with views of the Deben Estuary , and as such does not accord

with

the Councils stated policy of restricting such development.

In my view there are many other areas far more suited to this type of development.

I strongly oppose to this Action Plan.

Summary: Ferry Road is very narrow and would struggle to handle the additional 1000 car movements a day. I understand the site

would suffer from an exhausted sewerage system, causing problems for existing households unless a new pumping station is provided.

It would be some way from the main employment area (The Port) and therefore not fall in with the Councils stated policy of encouraging walking/cycling from new housing developments.

The field borders an area of Outstanding Natural Beauty with views of the Deben Estuary, and as such does not accord

with the Councils stated policy of restricting such development.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

SKMBT_C25315102015151.pdf

O - 6555 - 3668 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6555 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: mr. john salisbury [3668] Agent: N/A

Full Text: I strongly odject to any development of any sort on the land to the rear of Conway Cl./Upperfield Dr..lt would converge

on our privatacy and loose of natural light. There many other suitable areas around crying out for delvelopment and you care to choose one of natural beauty and not suitable for increase road access, of which I could go on and on to name other reasons. I suggest you look nearer home, by your own council headquarters to find much more suitable loctions alround or is that unquestionable. Please note our very strong objection to any planning developments on this land from

us

Summary: I strongly odject to any development of any sort on the land to the rear of Conway Cl./Upperfield Dr..It would converge

on our privatacy and loose of natual light. There many other suitable areas around crying out for delvelopment. I suggest you look nearer home, by your own council headquarters to find much more suitable loctions alround or is that

unquestionable. Please note our very strong objection to any planning developments on this land.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6562 - 3693 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6562 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Donna Matthews [3693] Agent: N/A

Full Text: I object to the proposed development of the field north of Conway Close / Swallow Close for residential use as part of

the AAP. The access of Ferry Road is a narrow country road and the additional traffic movements would create even more traffic congestion. It is unlikely new occupants would forsake driving their vehicles as cycling or walking to the town centre / dock area is too far for the majority. The field has been used for food crops every year that I have lived here, it is at the edge of an Area of Outstanding Natural Beauty and it is used daily as a recreational amenity by

walkers, cyclists and horse riders and this was would all be threatened by a housing development.

The access of Ferry Road is a narrow country road and the additional traffic movements would create even more traffic Summary:

congestion. It is unlikely new occupants would forsake driving their vehicles as cycling or walking to the town centre/dock area is too far for the majority. The field has been used for food crops every year that I have lived here, it is at the edge of an Area of Outstanding Natural Beauty and it is used daily as a recreational amenity by walkers, cyclists and horse riders and this was would all be threatened by a housing development.

Change to Plan

Sound? **Duty to Cooperate? Soundness Tests** Legal? Appear at exam?

Not Specified Not Specified Not Specified Not Specified None

O - 6574 - 3702 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

Soundness Tests

6574 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: mr gary dixon [3702] Agent: N/A

Full Text: I object to the extra traffic through upperfield drive that the development would generate, its an area of mainly retired

and elderly people who enjoy the peace and quiet,

this is an area of natural beauty which attracts and is home to a vast amount of wildlife.

the lanes and roads are not up to the amount of extra traffic generated.

I object to the extra traffic through upperfield drive that the development would generate, its an area of mainly retired Summary:

and elderly people who enjoy the peace and quiet,

this is an area of natural beauty which attracts and is home to a vast amount of wildlife.

the lanes and roads are not up to the amount of extra traffic generated.

Any future developments would be better suited to areas ripe for redevelopment that already have the roads, bus routes Change to Plan

Duty to Cooperate?

, facilites in place .

Legal?

Sound? Not Specified Not Specified Not Specified Not Specified None

Attachments:

Appear at exam?

O - 6577 - 3704 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6577 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Edna Boon [3704] Agent: N/A

Full Text:

I object to the above site being put forward for development. I live in Colneis Road near to the junction of Gleneagles Close and there is more than enough traffic coming from Upperfield Drive, Conway Close and Swallow Close into Colneis Road. If the access will be from Ferry Road obviously this traffic will come down Colneis Road as well.. We also get people coming from Western Avenue and roads in that vicinity coming into Colneis Road for a quick route onto the A14.

I have cars parking outside my house everyday from parents collecting their children from Colneis School. There are so many cars picking children up from this school that the road is gridlocked both sides into Sunningdale Drive and Rosemary Avenue is gridlocked a well. I know this is only for dropping off and picking up from school but there is also the 76 bus coming along as well. There is quite an area of road outside Colneis School with yellow lines but the cars have now moved along the road, is there really a parent collecting children by walking to and from school? I know when my children went to school we walked, could not afford two cars. There is also Kingsfleet School at the bottom of Colneis Road as well so that traffic comes along as well.

If there are 150 houses being built that will mean at least 300 cars and possibly 600 people if you work it out on 2.2 in each house. We cannot get appointments now in dentists, doctors and the hospital beds and operations are put back due to lack of beds, staff etc. The schools are full and I am sure bursting at the seams already so education will suffer for our own children as well as the ones coming into the area.

We have dog walkers going to the fields behind these roads and also often horse-riders bring their horses for exercise in this vicinity. It is an area of natural outstanding beauty and we do not require any more properties being built in this area to spoil this.

Please think about this project very carefully being making any final decision. I actually complained about some land on the corner of Gleneagles Close being changed by the couple in the house next to it. They have destroyed the area by having three trees cut down and put a load of laurel trees to make this piece of land more private for them and it looks hideous but they got planning permission, heaven knows how but nobody listened to me or my neighbours when we tried to stop this from happening. I now have to look at this area every day and I hate it (but nobody cared at the council when making the decision) but I am not going to move because I love my house. The reason they gave for having this land was that there garden was not as big as some in the area, the couple should have thought about this before into the house and area and not spoil our view which they have donw.

So for the above reasons how do you think the people are going to feel overlooking houses who live in Conway Close and Swallow Close when they obviously bought their houses because of the lovely country view they overlooked. I know that it is not guaranteed that views will stay as they are but it spoils your life when something different happens.

It is imperative that you think carefully and DO NOT let this residential development go ahead.

Summary:

I object to the site being put forward for development. There is more than enough traffic coming from Upperfield Drive, Conway Close and Swallow Close into Colneis Road. If the access will be from Ferry Road this traffic will come down Colneis Road as well.

If there are 150 houses being built that will mean at least 300 cars and possibly 600 people. We cannot get appointments now in dentists, doctors and the hospital. The schools are full so education will suffer for our own children as well as the ones coming into the area.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6583 - 3709 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6583 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr Malcolm Allen [3709] Agent: N/A

Full Text: I wish it to be put on record that I am strictly against any plan to develop the field north of Conway Close/Swallow Close.

Suffolk Coastal District Council does not seem to have learnt any lessons from all the objections it received when 200

homes were proposed on the field opposite.

We do not have the road infrastructure to handle the amount of traffic generated by so many new houses.

We do not have the sewerage system to handle anywhere near this number of new properties.

It does seem as though the only interest to SCDC is the number of new properties they can authorise to be built. How come we can have all these new homes and people and you are doing your level best to take away the land that is

meant to feed everyone.

Common sense surely suggests that we build on brown field sites and not the best agricultural land available to us. Suffolk Coastal District Councillors are elected by residents of the various towns & villages which make up this area. Is it

not about time they started to listen to what is being said by these residents??

I respectfully suggest that the answer you give to the proposal for these new homes is a very big NO. NO. NO. NO.

Summary: I wish it to be put on record that I am strictly against any plan to develop the field north of Conway Close/Swallow Close. We do not have the road infrastructure to handle the amount of traffic generated by so many new houses.

We do not have the sewerage system to handle anywhere near this number of new properties.

Common sense surely suggests that we build on brown field sites and not the best agricultural land available to us.

I respectfully suggest that the answer you give to the proposal for these new homes is a very big NO.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6584 - 3710 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6584 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mrs D Cardwell [3710] Agent: N/A

Full Text: I learn with alarm that it is proposed to build a minimum of 150 homes on the field north of Conway Close/Swallow

Close. This area does not have the infrastructure to accommodate this proposal and would destroy the quiet lane that is

Gulpher Road. How much longer before all of Felixstowe's farmland and recreational areas disappear.

I am totally against any proposal for this area and hope that the council will not go ahead with any new developments.

Summary: I learn with alarm that it is proposed to build a minimum of 150 homes on the field north of Conway Close/Swallow

Close. This area does not have the infrastructure to accommodate this proposal and would destroy the quiet lane that is

Gulpher Road. How much longer before all of Felixstowe's farmland and recreational areas disappear.

I am totally against any proposal for this area and hope that the council will not go ahead with any new developments.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6607 - 3723 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6607 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr Peter Austen [3723] Agent: N/A

Full Text: I am writing to register my objection to the inclusion of land to the rear of Conway Close and Swallow Close, Felixstowe,

in the Preferred Options Plan for future development.

My objection is based on the premise that Ferry road will not be able to cope with the increased traffic the proposed density of development will generate. The stretch of Ferry Road north of the junction with Colneis Road is narrow and already experiences problems with cars parking on both sides, particularly at school times. This results in congestion, and often results in the HGVs serving the farm in Marsh Lane being unable to pass through. Parking in the vicinity of the junction with Colneis Road also causes problems and increased danger, despite occasional monitoring by the Police. The site is remote from the town centre, some miles from the Felixstowe Academy, an even further from the main source of local employment at the Port, all factors which will require new residents to make extensive use of their cars, and greatly increase traffic in the Old Felixstowe area in general. The northern end of Ferry Road is widely used by walkers, cyclists and horse-riders, links with a recently established Quiet Lane, and is close to an AONB, and a large increase in traffic would be detrimental to these features.

I would suggest new development on the scale proposed for Ferry Road is therefore inappropriate, and should instead be located in areas which has a road system which can cope with increased traffic, or where there is a possibility of

improvements being made.

Summary: My objection is based on the premise that Ferry road will not be able to cope with the increased traffic the proposed

development will generate. Ferry Road north of the junction with Colneis Road is narrow and already experiences problems with cars parking on both sides. This results in congestion, often resulting in HGVs serving the farm in Marsh Lane being unable to pass through. I would suggest new development on this scale is inappropriate, and should be located in areas with a road system which can cope with increased traffic, or there is a possibility of improvements being

made.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6610 - 3728 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6610 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr Derrick Adams [3728] Agent: N/A

Full Text: I am objecting to the proposed development north of Conway Close/Swallow Close in Old Felixstowe,on the grounds

that Ferry Road is a narrow country lane and was not built to carry all the extra traffic that would be produced, that the existing sewerage could not cope with the additional capacity. schools, doctors and dentist's surgeries are already bursting at the seams, and just cannot cope with an additional 350 properties. (200 already have planning permission). My main concern is that if we continue to build on greenfield sites there will be nowhere to grow produce to feed future

generations.

Summary: I am objecting to the proposed development north of Conway Close/Swallow Close in Old Felixstowe,on the grounds

that Ferry Road is a narrow country lane and was not built to carry all the extra traffic that would be produced, that the existing sewerage could not cope with the additional capacity. schools, doctors and dentist's surgeries are already bursting at the seams, and just cannot cope with an additional 350 properties. (200 already have planning permission). My main concern is that if we continue to build on greenfield sites there will be nowhere to grow produce to feed future

generations.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6612 - 3730 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6612 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: JDB Cotton [3730] Agent: N/A

Full Text: I have the following comment on the proposal outlined in preferred policy FPP5 as to 150 dwellings at Ferry Road

Felixstowe.

The local roads and drainage systems are inadequate as you imply, and I cannot see that any amount of study is going

to conjure up a feasible solution to those problems.

You say glibly that the site scores well in terms of social effects as it is near to 'key services". which?

There no schools, bus services, surgeries, shops.

Traffic to work [probably to the Docks on the other side of town] and schools would produce unacceptable congestion

and traffic hazard at peak times, particularly bearing in mind the parked cars on the existing narrow streets.

The same remarks apply to the outline consent given for housing on the opposite side of Ferry Road, which this FPP

must bear in mind.

Summary: I have the following comment on the proposal in preferred policy FPP5.

The local roads and drainage systems are inadequate as you imply, and I cannot see that any amount of study is going

to conjure up a feasible solution to those problems.

You say glibly that the site scores well in terms of social effects as it is near to 'key services". which?

There no schools, bus services, surgeries, shops.

Traffic to work and schools would produce unacceptable congestion and traffic hazard at peak times, particularly

bearing in mind the parked cars on the existing narrow streets.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6613 - 3731 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6613 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr Sean Crean [3731] Agent: N/A

Full Text: I have the following comments on the proposal outlined in preferred policy FPP5 as to 150 dwellings at Ferry Road

Felixstowe.

In my opinion that area is unsuitable for development and will provide too much strain on roads and services in that area. I do not wish to live in a place which could potentially become like Ipswich which has dangerous levels of traffic around ill thought through estates in the last few years. Its a fact of life that we all rely on cars these days especially in Felixstowe and each house you plan could have up to 4 cars each. Until hoverboards and the like become the norm then I cannot believe anyone who doesnt have a financial interest in this will be "for" it. With so many against this I do

not see how a democratically elected council can possibly vote this through unless foul play is a factor.

Summary: The area is unsuitable for development and will provide too much strain on roads and services in that area. I do not wish

to live in a place which could potentially become like Ipswich with dangerous levels of traffic around ill thought through estates. Its a fact of life that we all rely on cars these days especially in Felixstowe and each house you plan could have up to 4 cars each. Until hoverboards and the like become the norm then I cannot believe anyone who doesnt have a

financial interest in this will be "for" it.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified Non

O - 6615 - 395 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6615 Object

Housing Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Respondent: Mr J Stafford [395] Agent: N/A

Full Text: Ref: Felixstowe Peninsular Area Action Plan - Preferred Options Public Consultation Document.

I object to the inclusion of Site SHLAA Ref 502e (Land North of Conway Close, Felixstowe) in the above consultation

document.

My reasons for objection are as follows:-

Although Site 502e is referred to as 'Conway Close' in the document, the prime impact will actually be felt on and around Ferry Road.

- 1. Consideration must be given to the fact that planning permission has already been approved for an additional c200 homes on the Ferry Road field directly opposite Site 502e.
- 2. The section of Ferry Road and Gulpher Road surrounding this proposed site is little more than a single track country lane, but totally in keeping with the rural landscape. The other roads nearby are narrow residential roads, totally inadequate and incapable of safely absorbing an estimated 400+ vehicles emanating from c350 additional properties i.e from the 2 new development sites.

The very narrow and dangerous Gulpher Road (designated a 'Quiet Lane') would soon become a 'rat run' to avoid the Town and get to the A14. Similarly, Upperfield Drive is already being used increasingly to avoid the busy and dangerous Ferry Road/ Colneis Road junction.

- 3. The significantly increased traffic volume from the 2 proposed Ferry Road development sites would also pass directly in front of Kingsfleet Primary School, Old Felixstowe Nursery and Colneis Junior School. These are already busy and very dangerous locations for parents and small children.
- 4. This is a Greenfield Site with High Grade Agricultural land and should continue to be used for local food production and NOT buried under concrete forever!
- 5. The site proposed is outside the Felixstowe Town Boundary and forms an important part of a necessary buffer zone for the nearby AONB.
- 6. The size and density of the development is excessive and totally out of character with the nearby housing and the semi-rural location. This is an example of 'urban sprawl' at its worst!
- 7. The area in and around the Ferry Road fields is classified by the authorities as RADON ACTIVE. There are plenty of other areas of Suffolk that are not Radon Active, so why deliberately target an area that has this environmental and safety risk!
- 8. The assertion by SCDC that this site is 'in a central location' and 'in close proximity to key services' is false and misleading. This site is on the very edge of the Town and distant from the Town Centre, Supermarkets, Docks, Rail and Bus services, Felixstowe Academy, Main Sea Front and Amusements, Leisure Centre, Dentists, Hospital, GP Surgery etc., making car use essential and increasing environmental pollution.
- 9. This area provides a valuable recreational amenity for residents, visitors and holidaymakers. Horse riders, walkers, ramblers, dog walkers. cyclists, joggers etc can be seen regularly using the roads and fields in this area.
- 10. Development here would spoil a lovely edge of town rural location that is a valuable asset for Felixstowe.
- 11. Site 502e is on high ground overlooking the nearby Area of Outstanding Natural Beauty.
- 12. The local Sewerage and Drainage System will not cope with such a large increase in housing in this area. The current system is at the very end of the Town System and, before any housing development expansion takes place, there are already complaints from residents of bad smells and blocked drains. AWA are aware.
- 13. Certain Councillors have said that they want housing here because of Dock expansion. This is a false assumption. Due to the current economic situation the Dock is not expanding its' workforce. In fact some sections are contracting. New competition particularly from the brand new London Gateway Container Terminal even cast doubts over future container throughputs at Felixstowe.

Summary:

The section of Ferry Road/Gulpher Road surrounding this site is little more than a single track lane, but totally in keeping with the rural landscape. The increased traffic volume from the 2 proposed Ferry Road developments would pass directly in front of Kingsfleet Primary School, Old Felixstowe Nursery and Colneis Junior School. The site is an important part of a necessary buffer for the nearby AONB. The size and density of the development is excessive and totally out of character with the nearby housing and the semi-rural location. This area provides a valuable recreational amenity for residents, visitors and holidaymakers.

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

O - 6615 - 395 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6615 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Change to Plan

Appear at exam?
Not Specified

Legal?
Not Specified

Sound? Not Specified **Duty to Cooperate?**Not Specified

Soundness Tests

None

C - 6633 - 2963 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6633 Comment

site.

Full Text:

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Suffolk Coastal District Council (SCDC Agent: N/A

Environmental Protection) [2963]

I would like to comment, with regard to air quality, on the above Preferred Options Consultation as follows:

1) Felixstowe Peninsula Area Action Plan

* Land North of High Street, Walton - SHLAA Ref 451g Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this

* Land rear of Conway Close, Felixstowe - SHLAA Ref 502e Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

- * Land opposite Hand in Hand Public House, Trimley St. Martin SHLAA Ref 451b Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.
- * Land off Howlett Way, Trimely St. Martin SHLAA Ref 451d and 451c Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with both of these sites.
- * Land South of Thurmans Lane, Trimley St. Mary SHLAA Ref 383f and 451f Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with both of these sites.

* Employment

Land at Haven Exchange

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

- 2) Site Allocations & Area Specific Policies Development Plan Document
- * SSP10 Garden Square, Rendlesham

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* SSP11 - 3-33 Suffolk Drive, Rendlesham

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* SSP22 - Bentwaters Park, Rendlesham

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* SSP 31 - Snape Maltings

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

Other comments

With regard to the Neighbourhood Plans for Woodbridge, Kesgrave and Leiston (and any others in the pipeline), we have particular concerns about developments with the potential to impact upon the volume and/or types of vehicular traffic at the Woodbridge Air Quality Management Area.

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

C - 6633 - 2963 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6633 Comment

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

It is sometimes difficult to convey to developers the importance of AQ impacts in respect of developments which may be, (by their own judgement) a significant distance from the Woodbridge AQMA; however, efforts to find ways of reducing the elevated levels of transport-related pollutants at this location to below the levels required by the EU Air Quality Directive (and UK regulations) have consistently failed to produce the required improvements in the 10 years or so since this AQMA was declared. This failure could result in financial penalties to the UK government from the EU. We are assured that any such penalties will be passed on to LAs with "failing" AQMAs in their districts. Consequently, we need to leave no stone un-turned in our examination of any proposed larger scale development (whether housing or otherwise) which has the potential to increase vehicle traffic at the existing Woodbridge Junction AQMA is consequently a matter of serious concern. Any such scheme must be accompanied by technical and robust modelling to predict the impact on traffic at this AQMA, accompanied by and assessment of the possible methods of mitigating those impacts.

The same general comments apply to some areas where our modelling/sampling indicates AQ thresholds are under pressure (but not yet breached) from transport-related sources.

Summary:

* Land rear of Conway Close, Felixstowe - SHLAA Ref 502e Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

Change to Plan

Appear at exam?
Not Specified

Legal?
Not Specified

Sound?
Not Specified

Duty to Cooperate?

Soundness Tests

Not Specified None

O - 6646 - 3742 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6646 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Pauline Varden [3742] Agent: N/A

Full Text: The development will have a detrimental effect on a rural area popular with walkers. Wildlife will also be adversely

affected.

The proposed 150 dwellings is too many especially as 200 dwellings are due to be built on the other side of Ferry Road. Ferry Road and the surrounding roads will be unable to cope with the increase in traffic from both developments,

especially at Kingsfleet school drop off and pick up times.

The area is not close to the town centre.

How will the local school and surgery cope with such a large increase in local residents?

Summary: The development will have a detrimental effect on a rural area popular with walkers. Wildlife will also be adversely

affected.

The proposed 150 dwellings is too many especially as 200 dwellings are due to be built on the other side of Ferry Road.

Ferry Road and the surrounding roads will be unable to cope with the increase in traffic from both developments,

especially at Kingsfleet school drop off and pick up times.

The area is not close to the town centre.

How will the local school and surgery cope with such a large increase in local residents?

Change to Plan If there is no alternative to using this rural area for housing - reduce the number of dwellings planned, significantly

improve the road network and ensure the local school and surgery have the capacity to cope with the influx of residents. Before developing this site - wait to assess the impact of the new housing on the other side of Ferry Road.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6651 - 3234 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6651 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mrs Julie Cornforth [3234] Agent: N/A

Full Text: Whats the point of having a "quiet lane" in the countryside, if you are going to build a vast housing estate on it? Gulpher

Road is the ONLY countryside lane remaining in Walton. Don't people deserve a bit of peace and quiet and tranquility in their hectic lives? It is not close to ANY key services. They would have to use cars in this location to get around.

Summary: Whats the point of having a "quiet lane" in the countryside, if you are going to build a vast housing estate on it? Gulpher

Road is the ONLY countryside lane remaining in Walton. Don't people deserve a bit of peace and quiet and tranquility

in their hectic lives? It is not close to ANY key services. They would have to use cars in this location to get around.

Change to Plan Build the houses in villages and towns where they are required by LOCAL people, not in open green spaces/prime

agricultural land where they are not needed.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6665 - 3743 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6665 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr Peter Ager [3743] Agent: N/A

Full Text: Dear Sir

I was unable to utilise the on line consultation form, hence my comments below:

I have a number of concerns concerning the development at FPP5 (and also the development already approved on the adjacent site to the east side of Ferry Road). I understand that the combined total number of dwellings will be 283 for the two developments.

FPP2 talks about the Physical Limits Boundaries. Apparently Gulpher Road is a "Physical Limits Boundary". It is equally apparent that there is "open season" on prime farm land for housing development. If that is the case then then is clearly an intention, at least long term, for SDDC to permit house building to the west of the FPP5 site and south of Gulper Road, also on prime farm land of course. (As indicated in 3.15 Inside the physical limits boundary, there is a policy presumption that development is acceptable in principle).

FPP5 is for 150 dwellings but that and the adjacent development will total around 283 dwellings and my concern both during the building stage and when completed is the extra traffic that will be generated. Kingsfleet Primary School in Ferry Road creates a real bottleneck for traffic at least three times a day (morning, lunchtime and afternoon).

During the construction phase there will be many movements of heavy vehicles at both sites. Heavy vehicle drivers currently find it virtually impossible to pass between the parked cars on either side of Ferry Road during school pick up and drop off times. The inevitable result will be HGV's using Upperfield Drive as a rat run. This quiet road is totally unsuited for HGV traffic and I would ask what action SCDC proposes to do to prevent such traffic?

On completion of the sites there will be 400-500 additional vehicles using Ferry Road. Many of these will be moving during the times of conjestion caused by Kingsfleet Primary School parents. Again, the inevitable result will be Upperfield Drive being used as a rat run by drivers wishing to avoid the school time conjestion in Ferry Road and I ask again what action SCDC proposes to do to prevent such traffic?

In short, therefore, refering to the Site Allocations and Area Specific Policies, I do not think that FPP5 is an appropriate area for housing development because it uses prime farm land and the council has not given adequate consideration to the impact the development will have on existing residents and local infrastructure during the construction phase and on completion.

Summary:

FPP5 is for 150 dwellings but that and the adjacent development will total around 283 dwellings. My concern during the building stage and when completed is the extra traffic that will be generated. Kingsfleet Primary School creates a bottleneck for traffic at least three times a day.

During construction there will be many movements of heavy vehicles at both sites. Heavy vehicles currently find it virtually impossible to pass between the parked cars on either side of Ferry Road during school pick up and drop off times. The inevitable result will be HGV's using Upperfield Drive as a rat run.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6689 - 3756 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6689 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Hilda Bigmore [3756] Agent: N/A

Full Text: IT'S A VERY BIG NO NO TO THE BUILDING AT THE REAR OF CONWAY CLOSE FELIXSTOWE. THE COUNTRY

LANES AND SURROUNDING ROADS ARE NOT SUITABLE FOR THE EXTRA VOLUME OF TRAFFIC IT WOULD

CAUSE

ALSO IT WOULD SPOIL THE COUNTRY-SIDE WHICH IS A LOVELY PART OF FELIXSTOWE.

IT WOULD BE SUCH A SHAME TO LOSE IT.

Summary: IT'S A VERY BIG NO NO TO THE BUILDING AT THE REAR OF CONWAY CLOSE FELIXSTOWE. THE COUNTRY

LANES AND SURROUNDING ROADS ARE NOT SUITABLE FOR THE EXTRA VOLUME OF TRAFFIC IT WOULD

CAUSE.

ALSO IT WOULD SPOIL THE COUNTRY-SIDE WHICH IS A LOVELY PART OF FELIXSTOWE.

IT WOULD BE SUCH A SHAME TO LOSE IT.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6723 - 3749 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6723 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr Robert Whitehouse [3749] Agent: N/A

Full Text: Why does the policy specify a "minimum" of 150 dwellings? - This level of housing density could not possibly "in

keeping with the surrounding area" which has a much lower housing density.

Summary: Why does the policy specify a "minimum" of 150 dwellings? - This level of housing density could not possibly "in

keeping with the surrounding area" which has a much lower housing density.

Change to Plan Change to para 2;

"50 dwellings expected on this site as a maximum ..."

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6769 - 3060 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6769 Comment

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Respondent: Felixstowe Town Council (Mr Ash Tadjrishi) [3060] Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Preferred Options Consultation

Thank you for the opportunity to respond to the Suffolk Coastal District Council Felixstowe Peninsula Area Action Plan Preferred Options paper. The Town Council considered this matter at its meeting of 11 November 2015.

Felixstowe Town Council was pleased to welcome and endorse the Felixstowe Peninsula Area Action Plan Preferred Options, subject to the following comments:

Page 13, Para. 2.02

We recommend adding the following to the end of the final sentence of this paragraph: ", as required by the July 2013 Local Plan."

Page 24, FPP3

Remove "(for residents and visitors)" from the bottom bullet relating to appropriate parking provision.

Page 26, Para. 3.30

This paragraph has been reduced in scope from an earlier draft and no longer references the unique location this site holds as a gateway to Felixstowe. It is vital that the policy ensures that any proposals for development of this site include appropriate consideration for this gateway and the statement this makes to those arriving to Felixstowe by road.

Page 27, FPP4

Remove "and Candlet Road" from the first bullet point. Any business units for this site should be restricted to the land adjacent to the A14 Dock Spur only.

Page 27, Title of 3.39

The title should read "Land" rather than "Lane" and include Swallow Close.

Page 29, FPP5

Please include Swallow Close and refer to this site as the "Land north of Conway Close and Swallow Close" throughout.

Page 49, Para. 5.06

Given the latest available information on these sites, this paragraph should be removed.

Page 50, Inset Map

The secondary shopping frontage should continue along Bent Hill on both sides of the road. It should also include the frontage of Trinity Methodist Church on Hamilton Road for consistency. Likewise the primary shopping area shaded in green should include this same section.

Page 51, Para. 5.10

Sentence should end "other than town centre uses".

Page 51, Para. 5.12

Please amend the final two sentences to read as follows:

"The scheme was not completed between Orwell Road and Bent Hill and the AAP will seek to encourage the continuation of the Shared Space along Hamilton Road. The completion of this scheme within the town centre boundary will provide a continuous link between Hamilton Road and Bent Hill and reinforce the connections between the town centre and the sea front."

Page 54, FPP15

Please amend the first paragraph to read "Any change of use proposals in this area should seek to retain a high proportion of retail activity."

Page 68, FPP21

Correction: "The provision of beach huts will be limited to those which currently exist. Any increased provision will be directed towards other parts of the sea front (namely Felixstowe Ferry Golf Club to Cobbolds Point Preferred Policy FPP19) as appropriate."

Page 74, FPP24

The policy should open with the following opening sentence:

"The need to strengthen Felixstowe as a seaside destination is recognised."

The next sentence should read: "Holiday accommodation will be encouraged and supported"

Page 82, FP27

This should be titled FPP27 rather than FP27.

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

C - 6769 - 3060 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6769 Comment

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Please revise the first line of text to read "Spa Gardens and Town Hall Gardens".

Appendix 7:Felixstowe, Trimley St. Mary & Trimley St. Martin Inset Map.

The Physical Limits boundary in regard to the seaward boundary should be drawn as in the 2001 Local Plan map - i.e disappear in to the sea rather than be drawn along the low water mark.

The dotted blue line denoting Proposed Tourism Areas is misleading and these areas should be marked out to define the landward extent and total area covered by those corresponding policies. Landguard peninsula should also be encapsulated whereas the line appears to end at Landguard point. As above, the lines between the areas should simply stop at the sea. The extensions of those lines into the sea can be wrongly interpreted as representing a policy as applying to an element of the sea.

The port area should be included within the Physical Limits boundary as is the case in the 2001 Local Plan map. The Physical Limits boundary in the Manor End area should include the caravan parks and Custom House, terminating at the boundary of Landguard Common.

The colouring of some of the designations on the main map are confusingly similar, notably those for the Proposed District Centre, the District Centre boundary and the revised Physical Limits boundary. Also, the use of very heavy lines at the scale of the main map is unhelpful.

Notwithstanding these observations, thank you for the opportunity to have been consulted. The Town Council looks forward to receiving information on the further development of the Area Action Plan.

Summary:

Page 29, FPP5

Please include Swallow Close and refer to this site as the "Land north of Conway Close and Swallow Close" throughout.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

AAP Preferred Options Consultation Response.pdf

O - 6781 - 3795 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6781 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr & Mrs L F Fowler [3795] Agent: N/A

Full Text: Proposed housing North of Conway Close/Swallow Close

We strongly object to the building of 150+ houses on the above site with the obvious addition of a huge increase in traffic filtering onto a very narrow road which already becomes very congested and dangerous to children at school times. A natural escape route would be through Upperfield Drive which would obviously become a rat run through to Colneis Road. We reside on the very tight corner in Upperfield Drive and witness several near misses. This is a relatively quiet retirement area and we would point out to you your own motto - Suffolk Coastal - where quality of life counts. Why therefore are you hell bent on destroying ours? Also, the proposed site borders an Area of Outstanding

Natural Beauty and is in direct conflict with your own policy of restricting such development.

Summary: Proposed housing North of Conway Close/Swallow Close

We strongly object to the building of 150+ houses on the above site with the addition of an increase in traffic onto a narrow road which becomes very congested and dangerous to children at school times. A natural escape route would be through Upperfield Drive which would become a rat run through to Colneis Road. We reside on the very tight corner in Upperfield Drive and witness several near misses. The proposed site borders an Area of Outstanding Natural Beauty

and is in direct conflict with your own policy of restricting such development.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6782 - 3668 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6782 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: mr. john salisbury [3668] Agent: N/A

Full Text: I strongly odject to any development of any sort on the land to the rear of Conway Cl./Upperfield Dr..lt would converge

on our privatacy and loose of natural light. There many other suitable areas around crying out for delvelopment and you care to choose one of natural beauty and not suitable for increase road access, of which I could go on and on to name other reasons. I suggest you look nearer home, by your own council headquarters to find much more suitable loctions alround or is that unquestionable. Please note our very strong objection to any planning developments on this land from

us.

In addition to my reply my wife would like to had that when we moved To Felixstowe in the spring this year, one of the reasons was the view from our window. How you can even consider taking this wonderful panaroma away is beside

us, when other locations are readily available

Summary: I strongly odject to any development of any sort on the land to the rear of Conway Cl./Upperfield Dr. There are many

other suitable areas crying out for delvelopment and you care to choose one of natural beauty and not suitable for

increase road access. Please note our very strong objection to any planning developments on this land.

My wife would like to state that when we moved to Felixstowe, one of the reasons was the view from our window. How

you can even consider taking this wonderful panaroma away is beside us, when other locations are readily available

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6785 - 2549 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6785 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mrs Judith Hedges [2549] Agent: N/A

Full Text: Here are my comments on:-

Felixstowe Peninsula Area Action Plan Preferred Options

Paragraph 3.39

I object to building on the land to the north of Conway Close because

- 1. Gulpher Road and the eastern leg of Ferry Road are Felixstowe's only quiet country lanes enjoyed by walkers, cyclists, horseriders and sight seeing cars for those not able to be active. To build on this site would increase the traffic flow such this would no longer be possible.
- 2. There is already severe congestion at the Ferry Rd entrance to Kingsfleet School at arrival and departure times. This would increase to an intolerable level with more housing.
- 3. Gulpher Road is too narrow to handle extra traffic from new housing on this site.
- 4 At present there is a very pleasant countryside footpath walk through The Grove, into Hyems Lane, across the field north of Conway Close, across the field by the Ferry Rd allotments to the pill box and then a short walk down the quieter section of Ferry Rd to the coast at the Golf Club. If the field north of Conway Close is developed and even if a right of way is preserved this walk will then be partly on a hard surfaced urban pathway and loose its attraction. Felixstowe has very few countryside footpath walks it is essential they are maintained. To walk along our footpaths is a superb experience. The views and countryside sights and smells are pure escapism and at present they are on our doorstep, It is our duty to keep them available for future generations.

Paragraph 7.02

I object to the last sentence of this paragraph. It should state that the high quality agriculture land and countryside north of Felixstowe IS to be protected. It should not say 'where possible'. We are custodians of our environment, town and countryside, for future generations and as such we must plan with them in mind not just for our needs for the next couple of decades. The area between the red district centre boundary and the length of Gulpher Road and the eastern leg of Ferry Road(nth of allotments) needs to be included in the area that needs to be protected from development. This may mean that the red district centre boundary needs to be moved to Gulpher Road so that the protected area is included.

It is essential that high quality agricultural land is preserved to help our country be self supporting as much as possible. Preserving agricultural land is also essential for our wellbeing. We have evolved to live off the land and in touch with the land. To continue with urbanisation of our environment will prove to be disastrous for our well being and expensive for society. In Felixstowe we are far more fortunate than people in many, many other towns and cities but that does not mean we should start loosing our countryside in the way they have lost their countryside. The Green Belt is essential for all and should be sacrosanct. We seem to pay more attention to countries loosing their big mammals than us loosing our small mammals. We have already lost our big mammals and birds. We must now look to keeping linked countryside areas for our fast disappearing stoats, weasels, hedgehogs, badgers, owls, greenfinches and our meadow and woodland wildflowers and native trees. Two facts amaze me, 1. I have never seen a tree sparrow and 2. you can count on one hand how many black poplar trees survive in our locality. It will be a sad day when future generations only see an owl or a hedgehog in a nature book

Paragraph 7.06

We are indeed short of woodland.

An area needs to be marked on the plan for woodland development in the same way as areas are marked out for housing, retail etc. If left to be considered as part of housing development plans then no substantial or connected woodlands will appear. Woodlands need to be connected to offer large enough territories for wildlife to thrive. In Felixstowe we are fortunate in having The Grove and Abbey Grove on our doorstep. Both woodlands are open to the public 24/7. These woods are cared for by volunteers under SCDC and the Woodland Trust respectively to provide a mixture of wildlife habitats combined with providing beautiful areas for the public to enjoy. Both these areas are small, too small for many small mammals to thrive. If the land connecting and between these two woodlands was converted to woodland then Felixstowe would have a woodland to be proud of, for people to enjoy and for wildlife to thrive and multiply. May be this land could be purchased between the community, Woodland Trust and developers in the town. Appendix 7

The area between the red district centre boundary and the length of Gulpher Road and the eastern leg of Ferry Road(nth of allotments) needs to be included in the area that needs to be protected from development. This may mean that the red district centre boundary needs to be moved to Gulpher Road so that the protected area is included. We are custodians of our environment, town and countryside, for future generations and as such we must plan with them in mind not just for our needs for the next couple of decades. They must be allowed to enjoy the environment that we have enjoyed. It is essential that high quality agricultural land is preserved to help our country be self supporting as much as possible. Preserving agricultural land is also essential for our wellbeing. We have evolved to live off the land and in touch with the land. To continue with urbanisation of our environment will prove to be disastrous for our well being and expensive for society. In Felixstowe we are far more fortunate than people in many, many other towns and cities but that does not mean we should start loosing our countryside in the way they have lost their countryside. The Green Belt is essential for all and should be sacrosanct. We seem to pay more attention to countries loosing their big mammals than us loosing our small mammals. We have already lost our big mammals and birds. We must now look to keeping linked countryside areas for our fast disappearing stoats, weasels, hedgehogs, badgers, owls, greenfinches and our meadow and woodland wildflowers and native trees. Two facts amaze me, 1. I have never seen a tree sparrow and 2. you can count on one hand how many black poplar trees survive in our locality. It will be a sad day when future generations only see an owl or a hedgehog in a nature book.

Many thanks for all your work on this plan

O - 6785 - 2549 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6785 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Summary: There is already severe congestion at the Ferry Rd entrance to Kingsfleet School at arrival and departure times. This

would increase to an intolerable level with more housing.

Gulpher Road is too narrow to handle extra traffic from new housing on this site.

Felixstowe has very few countryside footpath walks it is essential they are maintained. To walk along our footpaths is a superb experience. The views and countryside sights and smells are pure escapism and at present they are on our

doorstep, It is our duty to keep them available for future generations.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6804 - 3204 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6804 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr Keith Mahoney [3204] Agent: N/A

Full Text: CON

COMMENTS ON FELIXSTOWE PENINSULA AREA ACTION PLAN PREFERRED OPTIONS DOCUMENT RELATING TO FPP5 LAND NORTH OF CONWAY CLOSE

1. Development Density

The previous consultation document contained a table and it appears that the proposals regarding density outlined in this have not been changed in this document. The table below is a copy of the one in the previous document and outlines the sites under consideration within the Felixstowe housing market, their size and indicative capacity. I have added to this a density per hectare and have highlighted the Conway Close proposal. I have used the maximum capacities where a range is given but if the minimums were used it does not significantly alter the relativity.

SHLAA Site Size Indicative Density Ref (ha) Capacity per ha (Max) 914 0.65 7 10.8 451g 12 360 30.0 502e 3.83 153 39.9 Conway Close 1011c 0.58 12 20.7 325a 0.6 7 11.7 712 1.97 16 8.1 770 0.32 4 12.5 950 1.05 12 11.4 951 0.8 4 5.0 383a 1.81 43 23.8 383b 1.03 25 24.3 451b 2.25 54 24.0

This table illustrates that the density for site 502e is c.30% greater than any other site and 60% greater than the average and yet of the sites proposed for Felixstowe, Walton and the Trimley's and yet it has the poorest road access, drainage issues, is furthest away from employment opportunities, is adjacent to the AONB etc. The density is also far greater than the existing housing in this area. The fact that permission for housing at Ferry Road at a similar density has already been given should not be used as a precedent for allowing development of site 502e, in fact it is the main reason why it should not for the reasons outlined above. The densities proposed for the Ferry Road and Conway Close sites are completely out of alignment with the rest of the site proposals for Felixstowe. Some of the other sites do not have the significant issues outlined below so how can the proposed densities for Ferry Road and Conway Close be justified?

2. Traffic

The significant increase in traffic as a result of the development will endanger those using the area as an amenity. Gulpher Road is single track in parts and requires the use of passing places. It has tight bends and is generally narrow and is also used by agricultural vehicles accessing Gulpher Farm and adjacent farmland .The section of Ferry Road to Cliff Road from the junction with Gulpher Road also has tight bends and at certain points, for example, by the Residential Centre and the Suffolk Longhouse, traffic requires the use of passing places. There are no pavements or space for provision of pavements along most of these roads. Gulpher Road would also become the logical route to the new Academy at Walton for any residents with children attending this facility. The characteristics of Gulpher Road and the section of Ferry Road to Cliff Road mean that primary access would be along the part of Ferry Road that runs into Church Road or via its T junction to Colneis Road. The latter is a spinal link to the A14 and the town centre.

- Church Road would be used to access the local shopping facilities, primarily the Spar and Post Office and also the town centre. This road has a tight S bend on which there is a Church, Public House / Restaurant and Community Centre requires careful driving, particularly when there is a church service, funeral or wedding taking place or the Community Centre is in use and cars in addition to those of local residents are parked on both sides of the road. Traffic already struggles when events are taking place at these venues.
- Kingsfleet Primary School is sited opposite the junction with Colneis Road and the area has a designated speed limit of 20mph. At the beginning and end of the school day this area is heavily populated by parents, many of them car borne and is again only passable with a great deal of care. Currently the level of traffic using this route is moderate as there are not many residences beyond the school. The proposed development of up to 150 homes on top of the 200 for which outline permission has already granted will significantly increase traffic levels and endangering pedestrians near the school. The situation at Kingsfleet is already bad and the hanging of banners and leaflet dropping to parents initiatives have made no difference to the situation which should be accepted as a reality to the context in which this development is being proposed.
- Colneis School is also about half way along Colneis Road and although wider than the roads already described there is significant parking and pedestrian activity at the beginning and end of the school day. At the other end of Colneis Road is a roundabout at which a new Medical Centre (The Grove) is under construction. The impact on this junction of increased traffic levels from the development in addition to the above needs to be considered.

3. Drainage

The sewage and drainage system reaches its highest point at the end of the houses along the part of Ferry Road that adjoins Church Road and Colneis Road. There are already acknowledged issues with this system at this point and a

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

O - 6804 - 3204 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6804 Object

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

total development of 350 houses when combined with the site opposite cannot be accommodated by the existing drainage.

4. Agricultural Land

The development will permanently destroy high grade arable agricultural land at a time of increasing concern about food security and sustainability.

5. AONB

The site borders an Area of Outstanding Natural Beauty and currently acts as a buffer zone between the start of the urban environment of the town and the AONB. The plan states that it will not intrude on views from the A.O.N.B. At eye level on the site this appears true but buildings from about 8ft above ground level will be visible from Bawdsey, Felixstowe Ferry and Ramsholt and from much of Gulpher Road. It is the highest point in the area and the SCDC has not properly assessed the visual impact. In the past this was clearly understood and was a primary reason for rejection of the Ferry Road site in previous applications and also applies to the Conway Close proposal.

6. The Lock Report

SCDC has stated that it has been guided by the David Lock report which it commissioned. This report recommends that this site and the one on the opposite side of the road for which outline permission has already been granted should not be developed and clearly states the reasons why. It appears that SCDC is not being guided by the Lock report.

7. Loss of Amenity

The parts of Ferry Road bordering this site and Gulpher Road are used by ramblers, dog walkers, tourists, lone and groups of runners, walkers and cyclists and for the latter it is part of a designated cycle route. They will all be deprived of this rural amenity mainly due to increased road traffic. Yet another public footpath through open fields will effectively become a pavement through a housing development.

Summary:

The densities proposed for the Ferry Road and Conway Close sites are completely out of alignment with the rest of the site proposals for Felixstowe. The significant increase in traffic as a result of the development will endanger those using the area as an amenity. There are already acknowledged issues with the drainage system at this point and a total development of 350 houses when combined with the site opposite cannot be accommodated by the existing drainage. The development will permanently destroy high grade arable agricultural land at a time of increasing concern about food security and sustainability.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

Felixstowe Preferred Options.pdf

O - 6846 - 1641 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6846 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr Alan Muchal [1641] Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Preferred Options

Thank you for the opportunity to comment on the options. On the whole I think the document achieves a good balance

between the conflicting pressures on Felixstowe. I have only one significant comment as follows.

Paragraph 3.39

I object to building on the land to the north of Conway Close because Gulpher Road and the eastern leg of Ferry Road are Felixstowe's only quiet country lanes enjoyed by walkers, cyclists, and horse riders. Ferry Road/Gulpher Road is narrow and twisting and will already be under pressure from new housing agreed to the rear of Estuary Drive. This development would effectively put an end to its current character and the traffic generated would be a danger to itself and other users. Developing this area could also potentially open the door to future development of the whole area between Upperfield Drive and Gulpher Rd which would change this part of Felixstowe completely. It is vitally important

to maintain a buffer zone between the built up area and the AONB.

Summary: I object to building on the land to the north of Conway Close. Gulpher Road and the eastern leg of Ferry Road are

Felixstowe's only quiet country lanes enjoyed by walkers, cyclists, and horse riders. Ferry Road/Gulpher Road is narrow and twisting and will already be under pressure from new housing agreed to the rear of Estuary Drive. This development would effectively put an end to its current character and the traffic generated would be a danger to itself

and other users. It is vitally important to maintain a buffer zone between the built up area and the AONB.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6893 - 1967 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6893 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: B & D Ricketts [1967] Agent: N/A

Full Text: We feel this area has enough dwellings and people, relating to traffic now.

Existing residents - heavy demand on existing services place increasing demands.

Summary: We feel this area has enough dwellings and people, relating to traffic now.

Existing residents - heavy demand on existing services place increasing demands.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6900 - 166 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6900 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mrs Carol Florey [166] Agent: N/A

Full Text: This land in encroaching on AONB and our countryside. This is the thin edge of the wedge and once used, the

argument of 'extending the edge of built up areas' could be used again ad infinitum.

Gulpher Road is a designated quiet lane - a development of this size at the end of it would work in direct opposition to

this.

Summary: This land in encroaching on AONB and our countryside. This is the thin edge of the wedge and once used, the

argument of 'extending the edge of built up areas' could be used again ad infinitum.

Gulpher Road is a designated quiet lane - a development of this size at the end of it would work in direct opposition to

his.

Change to Plan Remove this planned development

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6906 - 33 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6906 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Captain Nigel Palmer [33] Agent: N/A

Full Text: This continues the destruction of farmland in the 'green lung' of Felixstowe. The restrictions you are proposing on

housing type etc. are similar to the objections put forward - and ignored - for the nearby outline planning permission for

200 houses

Summary: This continues the destruction of farmland in the 'green lung' of Felixstowe. The restrictions you are proposing on

housing type etc. are similar to the objections put forward - and ignored - for the nearby outline planning permission for

200 houses

Change to Plan Remove this proposed site from the plan.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6915 - 3852 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6915 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Angus Logansmith [3852] Agent: N/A

Full Text: 1) 2 story buildings on this site WILL overlook the AONB and the Deben valley

2) With this and the other development already with planning (other side Ferry Rd) Gulpher Rd will become a rat run for people wanting alternate access to the Academy, Morrisons etc. This seams a shame having just made this a quiet lane. 3) 1500+ extra vehicle movements a day along Ferry Rd, will cause traffic problems especially as this route is past at least one and if the via Colnies Rd 2 primary schools

4) Planning application DC/15/1128/OUT, many issues in para 1 & 4 of this rejection apply to this site

Summary: 1) 2 story buildings on this site WILL overlook the AONB and the Deben valley

2) With this and the other development already with planning (other side Ferry Rd) Gulpher Rd will become a rat run for people wanting alternate access to the Academy, Morrisons etc. This seams a shame having just made this a quiet lane. 3) 1500+ extra vehicle movements a day along Ferry Rd, will cause traffic problems especially as this route is past at least one and if the via Colnies Rd 2 primary schools

4) Planning application DC/15/1128/OUT, many issues in para 1 & 4 of this rejection apply to this site

Change to Plan I do not think this site is suitable

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6919 - 1968 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6919 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: R Wood [1968] Agent: N/A

Full Text: This site together with neighbouring agricultural land DC/13/3069/OUT will total 350 units minimum, but there are

overwhelming concerns about infrastructure and sustainability, particularly road access, safety, effects on AONB, lack of public transport, etc. I disagree with the overall assessment of sustainability. It is not centrally located, will not help

reduce the effects of traffic on the environment and has poor services and infrastructure.

Summary: This site together with neighbouring agricultural land DC/13/3069/OUT will total 350 units minimum, but there are

overwhelming concerns about infrastructure and sustainability, particularly road access, safety, effects on AONB, lack of public transport, etc. I disagree with the overall assessment of sustainability. It is not centrally located, will not help

reduce the effects of traffic on the environment and has poor services and infrastructure.

Change to Plan Build on brownfield sites such as the now defunct Deben and Orwell school sites.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6953 - 3864 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

6953 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr Robert Dunthorpe [3864] Agent: N/A

Full Text: PLEASE RECEIVE THIS RESPONSE AS A SERIOUS PROTEST AGAINST THE RESIDENTIAL BUILDINGS

PROPOSED BEHIND CONWAY CLOSE AND SWALLOW CLOSE.

THE ROADS AROUND THE ENTIRE BUILDING AREA, ARE NO MORE THAN YESTERYEAR LANES, AND SHOULD

REMAIN SO FOR ALL FUTURE GENERATIONS TO ENJOY.

FURTHERMORE, DURING CONSTRUCTION AND THEN UPON COMPLETION, THE VOLUME OF TRAFFIC WILL BE EXESSIVELY HIGH FOR THE AREA, CREATING 'RAT RUNS' ALONG UPPERFIELD DRIVE AND FERRY ROAD

ESPECIALLY DANGEROUS ON SCHOOL DAYS.

I CANNOT COMPREHEND HOW THE SCHOOLS AND DOCTORS WILL COPE WITH ANY ADDITIONAL RESIDENTS

Summary: PLEASE RECEIVE THIS RESPONSE AS A SERIOUS PROTEST AGAINST THE RESIDENTIAL BUILDINGS

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ESPECIALLY DANGEROUS ON SCHOOL DAYS.

I CANNOT COMPREHEND HOW THE SCHOOLS AND DOCTORS WILL COPE WITH ANY ADDITIONAL RESIDENTS

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7018 - 1678 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7018 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr Trevor Mason [1678] Agent: N/A

Full Text:

I object in the strongest possible terms to the inclusion of the site at Ferry Road in the plan. Permission has already (unwisely) been given for up to 200 houses on the opposite side of Ferry Road and this site must be rejected for the reasons below.

- * Ferry Road is a minor road does not have the capacity to deal with the traffic that will be generated by the site that has already been given permission, let alone a further 150 houses with the associated vehicles exiting onto the same road, having to pass by two primary schools where there is already unacceptable congestion every morning and afternoon. How the plan can say that use of this site 'helps reduce the effects of traffic on the environment' is beyond me.
- * These additional vehicles would cause further pollution to the atmosphere for residents already living in Ferry Road and neighbouring properties.
- * This is a green field site on prime agricultural land which should be retained for the production of food, not concreted over.
- * The mains sewerage system is already creaking under the pressure it faces from the current number of houses. I doubt whether it will be able to cope with the 200 houses for which permission has been granted, let alone a further 150. This is identified in the plan and cannot be ignored.
- * This site is described in the plan as being in a 'central' location. It is also described as being in 'close proximity to key services'. Nothing could be further from the truth. It could not be much further away from the employment centres (especially Felixstowe Port) and amenities of the town such as shops, doctors, dentists, leisure facilities etc. There is no bus service to the site.
- * It is adjacent to the Area of Outstanding Natural Beauty and to give approval to this site would further encroach on an amenity regularly used by walkers who enjoy the natural surroundings of the area as it adjoins a public footpath. Gulpher Road, adjacent to the site has been designated as a 'Quiet Lane' which is not conducive to having a housing estate next to it.

Summary:

These additional vehicles would cause further pollution to the atmosphere for residents already living in Ferry Road and neighbouring properties.

This is a greenfield site on prime agricultural land which should be retained for the production of food, not concreted over.

The mains sewerage system is already creaking under the pressure it faces from the current number of houses. It is adjacent to the Area of Outstanding Natural Beauty and to give approval to this site would further encroach on an amenity regularly used by walkers who enjoy the natural surroundings of the area as it adjoins a public footpath.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

O - 7068 - 2744 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7068 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr & Mrs Trevor & Gillian Mason [2744] Agent: N/A

Full Text: The below comments are forwarded in response to the consultation which ends on Monday 30th November 2015.

Housing

3.05 - "Within the Felixstowe Peninsula a figure of 50 units has been added to the requirement for Felixstowe Walton and the Trimlevs"

How is this figure calculated? The overall figure for Felixstowe has risen from 1,400 (inc the surrounding villages) in 2008 to 1,810 (exc the surrounding villages) in 2015. With this figure moving upwards all the time, the AAP will be meaningless by 2027. What plans are there to review it at regular intervals?

With regard to infrastructure provisions, there is currently a waiting list of 700 people at Crescent Dental Practice. The Grove Medical Centre (the largest in the town) is short of three doctors, and has to rely on retired GPs to try and fill the gaps. Their recent advertisement for salaried doctors achieved no applicants.

How are all these new residents going to be accommodated? Hoping for the best is not good enough.

Land North of Conway Close - SHLAA Ref. 502e

The Assessment is misleading and inaccurate in that it would provide access to two primary schools - if they still have capacity once the 200 homes have been built on the other side of Ferry Road. Those houses are intended to have their full quota of affordable houses in order to attract young families. For "Helps reduce the effects of traffic on the environment" read "access will be via a narrow country road which cannot cope with the current level of traffic". The main access to and from the Academy will be via a designated Quiet Lane, otherwise a two mile journey along Walton High Street will be necessary.

The site is referred to as "a central location" which is incorrect. It is 1.5 miles from the town centre, 4 miles by road from the Port complex, making a car essential. Its only large shopping outlet (20 minutes walk) is a convenience store whose prices accommodate small shopping needs only.

The site will suffer the same drainage problems as its neighbour, with developers to date being unable or unwilling to install a new system due to cost.

Preferred Policy FPP5:

150 dwellings is a minimum and based on medium density. No developer would be able to make a profit on providing 150 homes in keeping with existing (predominantly bungalows), let alone provide public open space and play facilities.

Directly opposite this site OPP was given last year for up to 200 homes, which represents high density. No stipulation was made that the new homes had to be in keeping with existing residences and no maximum height was given. No play space or open space is being provided (on the basis that the Council has refused to pay for its upkeep) and it is obvious that the same will apply to the 502e site.

District Centres

FPP17:

Expansion of District Centres - the DC identified at High Road East is entirely surrounded by houses. Apart from expanding across the road to Brackenbury Sports Centre, it does not seem possible to expand the retail element in this area.

In general terms, how is it possible to expand District Centres without affecting the town centre?

Some clarification on this point is necessary in order to convince the public.

Leisure

It can be anticipated that the 1,800 new residents will want something to do in their leisure time, but no specific activities are mentioned in the AAP. An opportunity has been lost with the designation of the old Yacht Pond site as a car park when it is not being used for mobile events - can this decision be reviewed in, say, two years time when useage for events is known? It would make a great site for a skate park and keep the youngsters off the road and the prom - particularly now the latter is being used by cyclists.

FPP22:

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

O - 7068 - 2744 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7068 Object

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

"Uses which enhance the unique landscape of Landguard" What are these? No examples are given. Does it take account of the current plans for the redevelopment of the Port and movement of the Viewing Point Café nearer to the museum? Car parking is essential to enjoy this area but should not be provided to the detriment of the natural enjoyment of this unique area.

Could some effort be made to ensure that bins are provided for detritus left by fishermen? Landguard beach is vulnerable to old bait and fish heads barely concealed in newspaper and buried in the shingle. This should not be allowed as it represents a serious hazard for others trying to enjoy the area. This will be particularly important if enhancement of the area is planned.

Summary:

The Assessment is misleading in that it would provide access to two primary schools-if they still have capacity once the 200 homes have been built at Ferry Road. Those houses are intended to have their quota of affordable houses in order to attract young families. For "Helps reduce the effects of traffic on the environment" read "access will be via a narrow country road which cannot cope with the current level of traffic". The main access to and from the Academy will be via a designated Quiet Lane, otherwise a two mile journey along Walton High Street will be necessary.

Change to Plan

Appear at exam?
Not Specified

Legal?
Not Specified

Sound? Not Specified **Duty to Cooperate?**Not Specified

Soundness Tests

None

O - 7069 - 2744 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7069 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr & Mrs Trevor & Gillian Mason [2744] Agent: N/A

Full Text: The below comments are forwarded in response to the consultation which ends on Monday 30th November 2015.

Housing

3.05 - "Within the Felixstowe Peninsula a figure of 50 units has been added to the requirement for Felixstowe Walton and the Trimlevs"

How is this figure calculated? The overall figure for Felixstowe has risen from 1,400 (inc the surrounding villages) in 2008 to 1,810 (exc the surrounding villages) in 2015. With this figure moving upwards all the time, the AAP will be meaningless by 2027. What plans are there to review it at regular intervals?

With regard to infrastructure provisions, there is currently a waiting list of 700 people at Crescent Dental Practice. The Grove Medical Centre (the largest in the town) is short of three doctors, and has to rely on retired GPs to try and fill the gaps. Their recent advertisement for salaried doctors achieved no applicants.

How are all these new residents going to be accommodated? Hoping for the best is not good enough.

Land North of Conway Close - SHLAA Ref. 502e

The Assessment is misleading and inaccurate in that it would provide access to two primary schools - if they still have capacity once the 200 homes have been built on the other side of Ferry Road. Those houses are intended to have their full quota of affordable houses in order to attract young families. For "Helps reduce the effects of traffic on the environment" read "access will be via a narrow country road which cannot cope with the current level of traffic". The main access to and from the Academy will be via a designated Quiet Lane, otherwise a two mile journey along Walton High Street will be necessary.

The site is referred to as "a central location" which is incorrect. It is 1.5 miles from the town centre, 4 miles by road from the Port complex, making a car essential. Its only large shopping outlet (20 minutes walk) is a convenience store whose prices accommodate small shopping needs only.

The site will suffer the same drainage problems as its neighbour, with developers to date being unable or unwilling to install a new system due to cost.

Preferred Policy FPP5:

150 dwellings is a minimum and based on medium density. No developer would be able to make a profit on providing 150 homes in keeping with existing (predominantly bungalows), let alone provide public open space and play facilities.

Directly opposite this site OPP was given last year for up to 200 homes, which represents high density. No stipulation was made that the new homes had to be in keeping with existing residences and no maximum height was given. No play space or open space is being provided (on the basis that the Council has refused to pay for its upkeep) and it is obvious that the same will apply to the 502e site.

District Centres

FPP17:

Expansion of District Centres - the DC identified at High Road East is entirely surrounded by houses. Apart from expanding across the road to Brackenbury Sports Centre, it does not seem possible to expand the retail element in this area.

In general terms, how is it possible to expand District Centres without affecting the town centre?

Some clarification on this point is necessary in order to convince the public.

Leisure

It can be anticipated that the 1,800 new residents will want something to do in their leisure time, but no specific activities are mentioned in the AAP. An opportunity has been lost with the designation of the old Yacht Pond site as a car park when it is not being used for mobile events - can this decision be reviewed in, say, two years time when useage for events is known? It would make a great site for a skate park and keep the youngsters off the road and the prom - particularly now the latter is being used by cyclists.

FPP22:

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

O - 7069 - 2744 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7069 Object

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

"Uses which enhance the unique landscape of Landguard" What are these? No examples are given. Does it take account of the current plans for the redevelopment of the Port and movement of the Viewing Point Café nearer to the museum? Car parking is essential to enjoy this area but should not be provided to the detriment of the natural enjoyment of this unique area.

Could some effort be made to ensure that bins are provided for detritus left by fishermen? Landguard beach is vulnerable to old bait and fish heads barely concealed in newspaper and buried in the shingle. This should not be allowed as it represents a serious hazard for others trying to enjoy the area. This will be particularly important if enhancement of the area is planned.

Summary:

The site is referred to as "a central location" which is incorrect. It is 1.5 miles from the town centre, 4 miles by road from the Port complex, making a car essential.

The site will suffer the same drainage problems as its neighbour, with developers to date being unable or unwilling to install a new system due to cost. 150 dwellings is a minimum and based on medium density. No developer would be able to make a profit on providing 150 homes in keeping with existing (predominantly bungalows), let alone provide public open space and play facilities.

Change to Plan

Appear at exam?
Not Specified

Legal?
Not Specified

Sound? Not Specified

Duty to Cooperate?Not Specified

Soundness Tests

None

S - 7078 - 455 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7078 Support

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: JCN Design (Mr Michael Smith) [455] Agent: N/A

Full Text: FELIXSTOWE PENINSULA AREA ACTION PLAN

LAND NORTH OF CONWAY CLOSE, FELIXSTOWE (SITE REFERENCE 502e)

On behalf of Optima Land and Property, I am writing to respond to the current consultation exercise with regard to the Felixstowe Peninsula Area Action Plan Preferred Options Document (October 2015), as part of the preparation of the documents to assist in the delivery of the Suffolk Coastal Core Strategy. My client has an interest in land to the north of Conway Close that is identified as a preferred site for residential development through Preferred Policy FPP5 and, as such, Optima Land and Property wishes to express their support for the creation of new homes to the north of Felixstowe.

With a site area of 3.38 hectares and an indicative capacity of 150 new homes, the land to the north of Conway Close has already been promoted through the call for sites process as Site 502e and can be considered to be deliverable in the short term. The footnote to Paragraph 47 of the National Planning Policy Framework states that a site is considered deliverable if it meets the criteria of being (a) available now, (b) offers a suitable location for development now, (c) is achievable with a realistic prospect that housing will be delivered on the site within five years and (d) development of the site is viable. The proposed development of the site meets these four tests of deliverability.

The land is currently in agricultural use and my client has control over the whole site in partnership with the owner, who currently farms the land. As such, it is currently available for development because notice to cease the current use can be served immediately and the construction of new homes could commence as soon as the necessary permissions are in place.

The site is adjacent to the northern edge of the existing built-up area of Felixstowe and will form a natural extension to the town without harming views of the Deben estuary or creating any negative impacts on the nearby Area of Outstanding Natural Beauty. The site is not isolated in the countryside and will read as part of the transition between the built-up area of Felixstowe and the rural area that surrounds it. The site is a logical and well-defined extension to the urban area, rounding off the corner between the existing homes to the south (Conway Close) and the forthcoming development on the east side of Ferry Road. Furthermore, there is no opportunity for the development of the site to begin a process of expansion into countryside to the north of Felixstowe because the site is enclosed by Gulpher Road to the north and the buildings of Park Farm to the west.

The position of the site on the northern edge of Felixstowe means that it is close to local services and facilities, including schools, shops, a medical centre and a community centre. Colneis Road is served by a regular bus service (routes 76 and 76A) and the site also has good access to employment areas, Felixstowe's town centre, the railway station and the A14. The mix, type and tenure of the new homes is an issue to be addressed through an application for planning permission but the site offers the opportunity to create a sustainable mixed community that builds on the existing social infrastructure and meets local housing needs. Issues noted in the Preferred Options Document can also be accommodated by a detailed scheme, including on-site open space provision (paragraph 3.41), design that creates an appropriate relationship with the existing properties to the south and the listed buildings to the north west (paragraph 3.42) and the mitigation of wildlife issues (paragraph 3.43). As such, the site can be considered to be a suitable location for development.

My client has confirmed that it is their intention that new homes will be delivered on the site within five years: there are no physical, environmental, social or legal constraints upon the site that could prevent development. It is accepted that the drainage issue noted in paragraph 3.44 will need to be addressed and that a transport assessment (paragraph 3.45) and an air quality assessment (paragraph 3.46) will be needed to support the detailed proposals for the development of the site. As such, upon the grant of planning permission for development for residential use, the site can be developed with new homes straight away, making it achievable in the short term.

The site is already controlled by a developer and initial assessments have taken place with a view to submitting an application for planning permission in the near future. Draft schemes for the site have been prepared and detailed options for the development of the site are currently being considered. Based on detailed financial appraisals undertaken by Optima Land and Property, subject to agreeing the appropriate contributions through the negotiation of site-specific planning obligations in parallel to the Community Infrastructure Levy, residential development on the site is a viable proposition.

In short, the site passes the tests of being available, suitable, achievable and viable and can therefore be considered to be a deliverable housing site. Moreover, the site is deliverable in the short term: it can be developed as soon as the necessary approvals are in place. As noted above, the preparation of a draft scheme is already underway and it is anticipated that pre-application discussions will take place in the New Year, with the potential for an application for planning permission to be submitted before the end of 2016, emphasising that the site can be delivered for residential development in the near future. On behalf of my client, I can confirm that it is anticipated that the emerging scheme will be designed in accordance with the requirements of the bullet points listed in Preferred Policy FPP5, including the provision of affordable housing (as required by Core Strategy Policy DM2) and a range of house types for sale on the open market.

As such, Optima Land and Property wishes to express its support for the proposed growth to the north of Felixstowe and, in particular, the identification of the land to the north of Conway Close (Site 502e) as a preferred location for residential development through Preferred Policy FPP5.

I trust that you will find this representation to be clear and straightforward, but if you have any queries, or should you wish to discuss the potential development of the site to the north of Conway Close in greater detail, please do not hesitate to contact me at the above address.

Summary:

The site is adjacent to the northern edge of the built-up area of Felixstowe and will form a natural extension to the town without harming views of the Deben estuary or creating negative impacts on the nearby Area of Outstanding Natural

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

S - 7078 - 455 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7078 Support

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Beauty. The site is not isolated in the countryside and will read as part of the transition between the built-up area of Felixstowe and the rural area that surrounds it. The site is a logical and well-defined extension to the urban area, between existing homes to the south and the forthcoming development on the east side of Ferry Road.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

O - 7095 - 3895 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7095 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Ms C.H Haniford [3895] Agent: N/A

Full Text: Comments on the Felixstowe Peninsula Area Action Plan

Para 3.0 Housing 3.28 & 3.29 Air Quality. How necessary would it be to have business units here? It's quite close to the proposed Strategic Employment area. There could be a risk of further pollution from some activities. Why not create a small shopping area?

SHLAA ref 451g

3.31 Is this to be high density housing?

3.32 Candlet Road is already unable to cope with traffic in the morning & evening rush hours - how would you improve this situation by the additional traffic from the proposed development? Would you introduce a cycle route to the Strategic Employment Area?

3.35 Access for walkers should continue across Candlet Road - perhaps a pedestrian bridge would ease safety concerns.

3.36 Anglia Water have commented here and elsewhere on the pressure on their network - what is to be done about this?

page 28 3.40, 3.41, 3.44 Density on this proposed site appears to be greater than on the adjoining site i.e. you propose 150 dwellings and the adjacent area of a similar size contains 32 dwellings. How necessary is it to create such a high density development in this area?

& page 29 3.45 The access to this site could be problematic as Gulpher Road is narrow and rural with several awkward bends, which is quite manageable when it's quiet, however a major (potential) increase could create unnecessary pollution and vehicular hazards.

SHLAA Ref 502e Overall Assessment The site can hardly be described as "central". Nor is it particularly close to "key services", unless you have transport, good mobility or no children.

4.0 Employment 4.04 Regarding rail services: there appears to be a conflict of interests between the needs of passengers and those of the port (and its less polluting mode of transportation of their containers) - what is to be done? Better and more reliable links for passengers would benefit tourism from further afield as well as better access for local people wishing to use the trains for long distance travel.

5.0 Retail FPP 14 p.52 Shared Space scheme - has there been any evidence gathered on how this is working out? Are there any proposals to limit access at Weekends?

6.0 Tourism & Sea Front p.71 Car Parking - on the day of 'Art on the Prom' there were half empty car parks and overflowing pavements in nearby streets, such as Princes Road and Queens Road. This often happens when there is a big event on the prom.

Summary:

Overall Assessment The site can hardly be described as "central". Nor is it particularly close to "key services", unless you have transport, good mobility or no children.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7122 - 1614 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7122 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr C W Mudge [1614] Agent: N/A

Full Text: Ref. Land North of Conway Close, Felixstowe - Preferred Policy FPPS

I have studied the Felixstowe Peninsula Area Action Plan with the Appendix 7 Map.

Most of the document seems sensible and reasonable but the one site that does concern me is the one mentioned

above.

If another 150 dwellings are proposed on top of the the 200 units permitted by the application LDC/13/3069/out, the extra volume of cars will cause a lot more congestion and pollution. All this traffic will have to go back into Felixstowe via Colneis Road or High Road East to reach employment and if not enough local employment then back onto the A14 which already carries a very heavy amount of traffic. No doubt Gulpher Road will be used by many as a short cut.

It is not easy to create new employment in this area and building extra housing without this is irresponsible.

Has any thought been given to the increasing workload that would fall on our already busy surgeries?

Are more schools to be built to accommodate the extra children that would be living in this area? I think not!

Summary: If another 150 dwellings are proposed on top of the 200 units permitted by the application LDC/13/3069/out, the extra

volume of cars will cause a lot more congestion and pollution. All this traffic will have to go back into Felixstowe via Colneis Road or High Road East to reach employment and if not enough local employment then back onto the A14 which already carries a very heavy amount of traffic. No doubt Gulpher Road will be used by many as a short cut. Has

any thought been given to the increasing workload that would fall on our already busy surgeries?

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7140 - 744 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7140 Comment

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Historic England (Sir/ Madam) [744] Agent: N/A

Full Text: Re: Preferred Options Public Consultation (19th October - 30th November 2015)

Felixstowe Peninsula Area Action Plan

Thank you for your letter dated 15th October 2015 regarding the above consultation. We have had the opportunity to assess the letter and consultation documents and can offer the following. Please note we have provided comments on the Site Allocations and Area Specific Policies within a separate letter to you dated the same. This follows a previous consultation and our comments dated 25th February 2015.

In terms of our general comments:

Recent Guidance from Historic England

We have recently published guidance on the Historic Environment and Site Allocations. Where we have not made comment below some additional guidance on ensuring a positive strategy for the historic environment is secured within the Felixstowe Area Action Plan can be seen by following this link- http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/.

In terms of our site specific comments:

Housing Sites

FPP4: Land north of Walton High Street, Felixstowe (451g)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the possible impact on the setting of two Listed Buildings, Grade II* Listed Walton Hall and Grade II Listed 362 High Street. We highlighted that the principal elevation of Walton Hall faces north and overlooks site 451g. It was considered that development here would urbanise the setting of this important, highly designated heritage asset, resulting in harm to its significance. It was expressed that harm would also be caused to the Grade II lodge and we strongly advised that an alternative site was found for development, though it was thought that there may be scope for some limited development at the eastern end of this site. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. The policy does however highlight that the development will need to be sympathetic to the Listed Buildings found at Walton Hall and 362 High Street. Whilst this would go some way to allay our concerns we still recommend that whilst it is considered the site can take a level of development there would be a detrimental harm to the setting of the Listed Buildings if the whole site is developed. If the site is to remain in the plan we would advise that the western end of the site is left relatively undeveloped to help protect the setting and it is considered that this side of the site might lend itself to fulfil the Public Open Space requirement.

FFP5: Land north of Conway Close, Felixstowe (502e)

We welcome the acknowledgment of the Listed Buildings and the requirement that development will need to be sympathetic to the Listed Buildings within the policy. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FFP6: Land opposite Hand in Hand Public House, Trimley St Martin (451b)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of two Grade II Listed Buildings (the Hand in Hand public house and Nos 251 and 253 High Road). We highlighted that both these buildings are traditional vernacular structures that date back to the agrarian origins of the village, and their current proximity to open countryside contributes to their setting and significance. We therefore encouraged the Local Planning Authority to identify alternative sites if at all possible so that the setting of these two buildings might be protected. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. However, it is also acknowledged that the policy requires a village green to be included within the scheme. The village green is to front High Road in order to reduce the impact on the setting of the Hand in Hand public house and this is particularly welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP7: Land off Howlett Way, Trimley St Martin (451c and 451d)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of the two Grade II listed churches and the Grade II listed Old Rectory. Whilst it is acknowledged that the consideration of the setting of the rectory is included within the policy, and this is welcomed, we would advise that the setting of the churches is also included. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP8: Land off Thurmans Lane, Trimley St Mary (383f and 451f)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of Grade II Listed Building Mill Farmhouse. It is acknowledged that there is a requirement in the policy that the development will need to be sympathetic to the setting of the mill and this is welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

Town Centre

FFP14: Felixstowe Town Centre and FFP15: Retail Frontages

As outlined within our response to you dated 25th February 2015 it is considered these policies should cover

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C - 7140 - 744 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7140 Comment

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

conservation and design issues. It is considered the policies should highlight the importance of retaining or restoring historic shopfront features both in terms of the positive contribution historic shopfronts make to the character of an area but also the economic benefit of providing traditional and bespoke shopping units to shopowners. A good example of how historic shopfronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a National success. The council have also seen a ripple effect of surrounding properties being restored. As well as including conservation and design issues within these policies the Council could consider additional advice within a Supplementary Planning Guide on Historic Shopfronts, especially given the importance and contribution the Historic shopping areas within the settlements of Suffolk make to the wider area.

District Centres

FPP17: District Centres

As above it is considered that this policy should cover conservation and design issues. It should highlight the contribution the Historic Environment makes to the economic success of district centres and seek to protect and enhance both the setting of historic assets and assets themselves.

Tourism and Sea Front Activities

We welcome the inclusion of a section which covers tourism and seafront activities. It is considered that point 6.03 on page 61 could also acknowledge and highlight the wider and more general positive contribution to Felixstowe that heritage tourism brings.

FFP18: Felixstowe Ferry and Golf Course, FFP19: Felixstowe Ferry Golf Club to Cobbolds Point, FPP20: Cobbolds Point to Spa, FPP21: Spa to Martello Park and FFP22 Martello Park to Landguard We welcome and support the acknowledgement and required protection of the historic qualities of these sections of the coast.

FPP23: Car Parking

We welcome the 'high quality of design' requirement relating to replacement car parking at point 6.36 on page 72. It is considered that this requirement should be included within the policy itself to give it more weight in decision making.

The Environment

We welcome the inclusion of a section on the Historic Environment which sits separately from landscape and ecological elements. We also welcome the section on Locally Listed Buildings and Features. It is considered the Historic Environment section should also highlight Felixstowe's archaeology.

It is acknowledged that no individual policies on the Historic Environment are proposed for the Area Action Plan itself, relying instead on saved policies within the Core Strategy and the National Planning Policy Framework. The Core Strategy does not have a specific historic environment policy, with certain aspects covered in other policies such as SP15 (Landscape and Townscape) and DM21 (Design Aesthetics) and policies for specific settlements. It is considered that there is a lack of a clear strategy relating to the Historic Environment, relating to local issues, at present, and we would encourage greater clarity. This should set out the Council's approach to the management of designated and non-designated heritage assets (including archaeology) and how issues such as heritage at risk will be tackled. It is considered that a Historic Environment Policy could be locally specific to cover the Felixstowe Peninsula Area Action Plan.

In addition to the above it is acknowledged that the issue of Felixstowe South Conservation Area At Risk is not being covered by the Plan. We therefore reiterate our previous comments as follows, it would be advantageous if the Area Action Plan identified specific policies to help remove it from the register. These might include utilising the conservation area appraisal to identify locally important buildings that contribute positively to the conservation area, and introduction Article 4 directives to protect such buildings. There may also be sites which are considered negative contributors to the character and appearance of the conservation area and the preparation of development briefs for such sites might help bring forward positive redevelopment. The conservation area survey identified the loss of architectural detail as a significant problem, and consideration might therefore be given to applying to the Heritage Lottery Fund for a Townscape Heritage programme for the area, or a smaller partnership scheme with Historic England to reinstate lost architectural details on key buildings. We would therefore still recommend the inclusion of a policy which tackles the issues at Felixstowe South Conservation Area.

FPP26: Areas to be Protected from Development

In our response to you dated 25th February 2015 we expressed concerns regard the inclusion of all the sites in Trimley St Martin which would in effect surround a number of Listed Buildings including Grade II listed churches, the Grade II listed Old Rectory and Grade II Listed Building Mill Farmhouse. We recommended the inclusion of an area to be protected from development which would protect the remaining green wedge and as a result protect the setting of a number of Listed Buildings. It is acknowledged that the green wedge within Trimley St Martin is proposed to be included within the Areas to be Protected from Development and this is particularly welcomed and supported.

FPP27: Historic Park and Garden

We welcome the inclusion and the content of this policy.

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

C - 7140 - 744 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7140 Comment

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Other Issues

Coastal Change Management and Areas of Flooding

We welcome the inclusion of this section. It is considered this section should also contain a paragraph on issues and opportunities of climate change and flooding relating to the Historic Environment. Further guidance on flooding issues can be found here- http://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/.

For information and for further policy consultation please note our new consultation email address for the East of England, eastplanningpolicy@HistoricEngland.org.uk.

Summary:

We welcome the acknowledgment of the Listed Buildings and the requirement that development will need to be sympathetic to the Listed Buildings within the policy. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

Change to Plan

Appear at exam?
Not Specified

Legal?
Not Specified

Sound? Not Specified

Duty to Cooperate?Not Specified

Soundness Tests

None

O - 7166 - 505 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7166 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Save Felixstowe Countryside (Mr John Johnston) Agent: N/A

[505]

Full Text: SAVE FELIXSTOWE COUNTRYSIDE INPUT TO PREFERRED OPTIONS CONSULTATION

- November 2015

Do you think that the Council has selected the most appropriate preferred options?

No. Save Felixstowe Countryside (SFC) cannot support the irreversible loss of grade 1 & 2 agricultural land - much needed for food production as global warming accelerates in forthcoming years. Nor can we support the proposed gradual erosion of what is probably the last country lane in Felixstowe, much loved & enjoyed by Felixstowe residents for walking, cycling & horse riding.

Can you suggest a more suitable approach than that outlined?

The fundamental driver for housing is to meet Govenment targets for housing in order to stimulate the economy. Housing is not for local needs but for predicted migrants to the area. Felixstowe is the wrong location for such high growth given;

* Felixstowe employment profile is distorted by a single massive employer whose employees are used to long distance travel. The many redundancies in Felixstowe go unannounced and silently disregarded whilst what little employment is "mooted" is heralded as "justification" for housing whether or not it comes to fuiting. Felixstowe is clearly "someones" preferred location. Not the residents.

* Demand for Felixstowe housing is the LEAST in the District evidenced by the fact it REMAIN the cheapest location in the District for housing. Housing is expensive all over the District in part due to individuals investing in & renting multiple properties - take a look at the Register of Councillors' interests of Suffolk Coastal Councillors, "Interest 5" available at; https://waveney.firmstep.com/default.aspx/RenderForm/?F.Name=jNzibiXCCa3&HideToolbar=1&CID=1&TAPC=147

* Felixstowe IS at the end on a peninsula, naturally constrained, and transport links shared with ever increasing port traffic.

* The promised rail passing place, an outcome from a Planning Enquiry as a pre-requisite for dock expansion has not materialised. Expansion is in place, no rail passing place. Imports are significantly accelerating and with it Lorry traffic.

* Nett commuting during the morning rush hour is outward from Felixstowe - more houses = more commuters. When there is an accident on the Felixstowe stretch of the A14 - it is gridlock!

* Traffic up & down the Felixstowe peninsula has increased significantly and commuters from Felixstowe contend with Lorries which pull out at the last minute and at a moments notice trying to overtake yet hardly able to do so.

* The Seven Hills interchange backs up to the A14 every morning from at least 7:30am till 9.00am for Felixstowe commuters wishing to travel north on the A12 from the A14. For traffic heading to the north of the District, Trimley St Martin will become a "rat-run" to avoid congestion, causing even more chaos outside Trimley St Martin school in the morning.

* Expansion at Martlesham will exacerbate current problems at the Seven Hills interchange worse. Flows from Martlesham joining the westbound carriageway to travel over the Orwell Bridge, already beyond capacity, create a continuous flow preventing traffic from Felixstowe travelling to Martlesham or beyond.

* Increasing the housing at Felixstowe will increase the differential between house prices in Felixstowe and the rest of the District causing a corresponding increase in commuters from Felixstowe prepared to travel to take advantage of the cheapest properties in the District.

* Getting an advance appointment at the GP is no longer possible since the new Health Centre was built. Only "on the day" appointments with a doctor may be booked if you enter the call queue at or close to 8am. After this, you need to call the following day. Whilst the mitigation of "we'll get more Doctors" - can they be got? We feel sure the Surgery would get the much needed Doctors today to relieve todays problems if they could so any mitigation promise of "we'll get more Doctors" cannot be delivered.

* Building more houses to support more migrants to commute from Felixstowe will only make matters worse. Strategic growth at Felixstowe is the wrong solution.

Are there any other alternative options that need to be considered?

The policy of restraint at Felixstowe should continue with strategic development encouraged to the North of the district where land is abundant and population densities lower.

Bentwaters is planned to be developed as a 380 Hectare employment site. This new development is larger than the CURRENT Felixstowe port which amounts to 340 Hectares. However, there doesn't appear to be any plan to provide housing which might be expected from efficient use of the site.

Do you agree with the findings of the sustainability appraisal assessments undertaken?

Do you have any other comments on the preferred options documents? Felixstowe Preferred Options document.

Land North of High Street, Walton, Felixstowe

Site Area: 12.00ha SHLAA Reference: 451g also referenced as:

S4.5 - Land North of High Street Walton - Employment site

The area is grade 1 agricultural land and construction on this site would result in the irreversible loss of the best and most versatile agricultural land.

It also provides clear visual separation between Walton & Trimley St Mary. A simple road does NOT provide such a visual separation evidenced by the fact that today Walton High Road does not provide a strong separation - Trimley St Mary exists on both sides of Walton High Road, not just on one side.

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

O - 7166 - 505 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7166 Object

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Lane North of Conway Close, Felixstowe

Site Area: 3.38ha SHLAA reference: 502e

The area is grade 1 agricultural land and construction on this site would result in the irreversible loss of the best and most versatile agricultural land.

Conway Close, Šwallow Close and Upperfield Drive currently create a firm edge of the built up area of Old Felixstowe with the countryside to the north and must be retained, in the same way as SP26 protects Woodbridge.

The land constituting SHLAA reference 502e provides a visual separation between modern estate housing and the small country cottage developments on Gulpher Road & the country element of Ferry Road as well as the already identified Park Farm Cottages.

The site to the east has already fallen with significant loss of Countryside in the form of "site 166b" which should never have been allowed. If development of site 502e is permitted, development would cross the hard edge of Ferry Road and risk the gradual creep of housing across North Felixstowe eroding the tranquil nature of Gulpher Road, presently enjoyed by cyclists, horse riders & walkers alike. Perhaps that's someone's secret plan? This is contrary to the wishes of Felixstowe residents and has been the subject of public outcry in the past.

Land North of High Street Walton 4.25

Are the policy requirements justified and do they meet the needs of the local community?

The housing requiremets are not for the local community - they are for projected migrants and, as seen by the Felixstowe South Sea-front developments, "buy-to-let" properties.

They do not meet the needs of the local community as they are impacting the North Felixstowe landscape - an area identified by David Lock as what makes Felixstowe special and should be protected.

What is proposed is contrary to the needs & wants of Felixstowe residents.

Summary:

Construction on this site would result in the irreversible loss of the best and most versatile agricultural land.

Conway Close, Swallow Close and Upperfield Drive currently create a firm edge of the built up area of Old Felixstowe with the countryside to the north and must be retained, in the same way as SP26 protects Woodbridge.

If site 502e is permitted, development would cross the hard edge of Ferry Road and risk the gradual creep of housing across North Felixstowe eroding the tranquil nature of Gulpher Road, presently enjoyed by cyclists, horse riders & walkers alike.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

O - 7168 - 1573 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7168 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

N/A Respondent: Mr Daniel Keeble [1573] Agent:

Full Text: Regarding inclusion of land behind Conway Close & Swallow Drive in the Area Action Plan.

> I wish to express my concern with the proposed development for the land at the rear of Conway Close and Swallow drive in Old Felixstowe.

This land is high grade agricultural land which is a necessary component of the countries sustainability, when it is gone it's gone forever. Also in this area are considerable wildlife including bats which would be impacted by the proposed development. Please note that this area of land borders an area of outstanding beauty, the council and planning authority should look to protect this area from development rather that look for financial gain which is generally against the will of the local community. I would also like to draw your attention to the SCDC Environmental Protection comment on the action plan which stated 'Land rear of Conway Close, Felixstowe - - SHLAA Ref 502e Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site. For further information please see Representation 6633

The land itself is not best located as the access routes are only via small and already congested roads which cannot be enlarged and widened. This is a major concern on Ferry road where the narrow road around Kingsfleet school already presents issues, careful consideration to the pupils form the junior school at both Kinsgfleet and Cloneis Schools need to be taken, increased volume of traffic in this area are likely to increase accident rates especially during periods of development from contractor vehicles, access issues and existing over congestion. It is likely that the volume of traffic will further force some of the additional vehicles off Colneis and down Upperfield drive so the traffic at Kingsfleet school can be missed, this in turn will make Upperfield Drive a 'rat run' which is not safe nor well thought out.

The local primary schools and new Academy are not capable of accommodating such an increase in pupils, there are already issues around staffing at some of these educational facilities and this will further burden what is not a flagship education system.

Access to general practitioners will also be further restricted, waiting times will be increased and as the local council is well aware Felixstowe has a proportion of elderly people who require access to these facilities which are already over stretched and not likely to be enhanced due to spending restrictions.

Waste water and sewerage infrastructure is not suitable, use of the existing network will not be possible without creating problems.

The proposed development at the rear of Conway Close and Swallow Drive is close to the furthest point away from anything in Felixstowe. Access to the town will be challenging. There is no clear, validated proof where these new residents will be working. Felixstowe does not have the necessary businesses to support these people, this intern means that there is a high likelihood many of these new residents will only live in the town for property price reasons and this will result in further traffic movements in and out of the Felixstowe on the A14 resulting in further pollution.

This proposed development is but the tip of the iceberg in regards to the quantity of homes being proposed over the coming years. If indeed this plan is forced, albeit unnecessary, It would seem logical that the best approach would be to find a site that could accommodate all these new homes whilst also maintaining the existing community of Felixstowe and the surrounding villages. This would in turn result in the required infrastructure being built as part of the solution therefore sewerage, traffic management, education, general practitioner etc etc would be planned from the start ratter that stretched to fit.

For clarity, I object to this area of land (behind Conway Close & Swallow Drive to be included in the Area Action Plan).

With hopes that common sense prevails.

Summary:

The land is not best located as the access routes are via small and already congested roads which cannot be enlarged and widened. The volume of traffic will further force some of the additional vehicles off Colneis and down Upperfield drive so the traffic at Kingsfleet school can be missed.

The local primary schools and new Academy are not capable of accommodating such an increase in pupils. Waste water and sewerage infrastructure is not suitable, use of the existing network will not be possible without creating problems. Access to gp's will be further restricted, waiting times will be increased.

Change to Plan

Legal? Sound? **Duty to Cooperate?** Soundness Tests Appear at exam?

Not Specified Not Specified Not Specified Not Specified None

Attachments:

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support -Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

O - 7169 - 3906 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7169 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mrs Rosemary Keeble [3906] Agent: N/A

Full Text: I wish to object to the land at the rear of Conway close to be included in the area action plan.

My reasons for this objection are;

* Loss of agricultural land

* Loss of countryside for recreational use

* Effect to wildlife during and post development, this includes bats that are in that area

* Increased traffic in this area especially around Kingsfleet School

* There are plenty of unused properties or infill building plots on brown field sites available without the need to destroy

the countryside and local community.

Summary: I wish to object to the land at the rear of Conway close to be included in the area action plan.

My reasons for this objection are;

* Loss of agricultural land

* Loss of countryside for recreational use

* Effect to wildlife during and post development, this includes bats that are in that area

* Increased traffic in this area especially around Kingsfleet School

* There are plenty of unused properties or infill building plots on brown field sites available without the need to destroy

the countryside and local community.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7170 - 3907 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7170 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Debbie Keeble [3907] Agent: N/A

Full Text: Regarding the land behind Conway Close & Swallow Drive in the Area Action Plan.

The land behind Conway Close and Swallow Drive is high grade agricultural land which is a critical component of the countries sustainability, should you allow this land to be used for building it will be gone forever.

As I am sure you are aware this area has considerable wildlife including bats which would be impacted by such a development. Please note that this area of land borders an area of outstanding beauty, the council and planning authority should look to protect this area from development rather that look for financial gain which is generally against the will of the local community. I would also like to draw your attention to the SCDC Environmental Protection comment on the action plan which stated 'Land rear of Conway Close, Felixstowe - - SHLAA Ref 502e Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site. For further information please see Representation 6633

The land itself is not best located as the access routes are only via small and already congested roads which cannot be enlarged and widened. This is a major concern on Ferry road where the narrow road around Kingsfleet school already presents issues, careful consideration to the pupils form the junior school at both Kinsgfleet and Cloneis Schools need to be taken, increased volume of traffic in this area are likely to increase accident rates especially during periods of development from contractor vehicles, access issues and existing over congestion. It is likely that the volume of traffic will further force some of the additional vehicles off Colneis and down Upperfield drive so the traffic at Kingsfleet school can be missed, this in turn will make Upperfield Drive a 'rat run' which is not safe nor well thought out.

The local primary schools and new Academy are not capable of accommodating such an increase in pupils, there are already issues around staffing at some of these educational facilities and this will further burden what is not a flagship education system.

Access to general practitioners will also be further restricted, waiting times will be increased and as the local council is well aware Felixstowe has a proportion of elderly people who require access to these facilities which are already over stretched and not likely to be enhanced due to spending restrictions.

Waste water and sewerage infrastructure is not suitable, use of the existing network will not be possible without creating problems.

The proposed development at the rear of Conway Close and Swallow Drive is close to the furthest point away from anything in Felixstowe. Access to the town will be challenging. There is no clear, validated proof where these new residents will be working. Felixstowe does not have the necessary businesses to support these people, this intern means that there is a high likelihood many of these new residents will only live in the town for property price reasons and this will result in further traffic movements in and out of the Felixstowe on the A14 resulting in further pollution.

This proposed development is but the tip of the iceberg in regards to the quantity of homes being proposed over the coming years. If indeed this plan is forced, albeit unnecessary, It would seem logical that the best approach would be to find a site that could accommodate all these new homes whilst also maintaining the existing community of Felixstowe and the surrounding villages. This would in turn result in the required infrastructure being built as part of the solution therefore sewerage, traffic management, education, general practitioner etc etc would be planned from the start ratter that stretched to fit.

For clarity, I object to this area of land (behind Conway Close & Swallow Drive to be included in the Area Action Plan).

With hopes that common sense prevails.

Summary:

The land itself is not best located as the access routes are only via small and already congested roads which cannot be enlarged and widened. Access to the town will be challenging. There is no clear, validated proof where these new residents will be working.

The local primary schools and new Academy are not capable of accommodating such an increase in pupils. Waste water and sewerage infrastructure is not suitable, use of the existing network will not be possible without creating problems.

. Access to general practitioners will be further restricted & waiting times will be increased.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7254 - 3930 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7254 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr Keith Phair [3930] Agent: N/A

Full Text: It is disappointing but not surprising to see this policy recommendation emerge in your latest consultation document.

This site suffers from all the environmental and transport disadvantages of the site on the opposite side of Ferry Road (DC/13/3069/OUT - see my previous objection to that application) but additionally erodes the amenity value of the Gulpher Road Quiet Lane, as well as creating a visual instrusion to the landscape along Gulpher Road and the parallel track from the playing fields that is well-used by dog-walkers. It will also change the character of the footpath link

between the track and Ferry Road into nothing more than a back alley

It is my opinion that, taken together with the site already permitted, there will be unacceptable and dangerous levels of traffic and congestion in the vicinity, especially in relation to the junction between Ferry Road and Colneis Road where Kingsfleet School is located and through which the vehicles of some 360 additional households are likely to travel on a daily basis - many of which will make a right turn from Ferry Road into Colneis Road during school hours in the morning.

Summary: This site suffers from all the environmental and transport disadvantages of the site on the opposite side of Ferry Road. In my opinion, taken together with the site already permitted, there will be unacceptable and dangerous levels of traffic

and congestion in the vicinity, especially in relation to the junction between Ferry Road and Colneis Road where Kingsfleet School is located and through which the vehicles of some 360 additional households are likely to travel on a daily basis - many of which will make a right turn from Ferry Road into Colneis Road during school hours in the morning.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7258 - 2931 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7258 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: -- [2931] Agent: N/A

Full Text:

Felixstowe Peninsula Area Action Plan-Preferred Options Document-October 2015.

The following are my comments concerning the Felixstowe Peninsula Area Plan Preferred Options Document-October 2015:

The FPAAP Preferred Options Consultation document discusses the need for more new housing to be built in the Felixstowe Peninsula. In order to meet the health and welfare needs of a growing population, any form of new housing development also needs to include and incorporate a plan for delivering extra health care facilities and educational establishments within this area. Currently, within Felixstowe, there are waiting lists for NHS dentists, local infant schools are over- subscribed and there are not enough General Practitioners.

- 1. SHLAA Ref: 502e: Highways and Byways- Church Road extends into Ferry Road as does Colneis Road. Church Road consists of a public house, a community centre and a church. The church, public house and community centre (on a regular basis) attract visitors who park their cars along that particular stretch of road. Ferry Road and Colneis Road each consist of an infant school and, as a result, attract parents who park their cars on either side of the road. Currently, local Councillors and the Police have been informed of the dangerous parking conditions which exist, on a regular basis, in Church Road, Ferry Road and Colneis Road.
- 2. SHLAA Ref: 502e & site 166b: Highways and Byways- Site 502e and 166b are located opposite one another and are two plots of agricultural land. The location of both sites are situated at the north of Ferry Road. Access to either site is via Church Road or Colneis Road, Gulpher Road or Ferry Road (east). Church Road and Colneis Road are becoming increasingly congested (see point 1). Gulpher Road is a designated 'quiet lane' as well as a cycle route and consists of a farm. Gulpher road is a road which bends and twists and is only wide enough for one vehicle. Ferry Road (east) narrows and is only wide enough for one vehicle. Marsh Lane is located to the north of Ferry Road (east) and consists of a farm and livery. Currently, in this area, the roads are in constant use by farming vehicles and machinery. New housing on site 502e and 166b will generate extra car users on an already busy and awkward road system in this area.

 3. SHLAA Ref: 502e: Location- This site is not located in close proximity to Felixstowe town centre, medical services, employment opportunities or public transport. Residents living in proposed new housing on site 502e and 166b will have no option but to travel via a car. Please also refer to points 1&2.
- 4. SHLAA Ref: 502e: An Area of Outstanding Natural Beauty- This area is designated as an AONB. New housing will inevitably corrupt the overall view and scenic beauty of the AONB. Currently both site 502e and site 166b act as an important natural green buffer which protects the AONB from urban development and sprawl. New housing, in this AONB area, will inevitably pollute the air and the night sky and also cause noise pollution. Specific AONB legislation designed to protect the sensitive nature of an AONB will need to be referred and adhered to.
- 5. SHLAA Ref: 502e: Wildlife- This site is a natural habitat for a plethora of wildlife (such as a barn owl). New housing will destroy the natural habitat for all wildlife indigenous to this area.
- 6. SHLAA Ref: 502e: Public Health and Sanitation- This site is located on one of the highest points in Felixstowe. Properties already existing, to the north, opposite site 502e are not connected to the public sewage system. New housing built on site 502e and 166b will need to rely on the public sewage system, which flows downwards along the south of Ferry Road into Church Road. Some residents living in the south of Ferry Road have complained to the relevant authorities and local Councillors concerning foul water flooding their property.
- 7. SHLAA Ref: 502e: Agricultural Land-This site is currently used to grow crops. New housing should be built on land designated as 'brown field' sites. The local population needs a long term sustainable food resource and should not just be reliant on food imports.

Summary:

local Councillors and the Police have been informed of the dangerous parking conditions which exist, on a regular basis, in Church Road, Ferry Road and Colneis Road.

This site is not located in close proximity to Felixstowe town centre, medical services, employment opportunities or public transport

This area is designated as an AONB. New housing will inevitably corrupt the overall view and scenic beauty of the AONB. New housing should be built on land designated as 'brown field' sites. The local population needs a long term sustainable food resource and should not just be reliant on food imports.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7264 - 3934 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7264 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr & Mrs Williams [3934] Agent: N/A

Full Text: Preferred Options Public Consultation Response form

*Do you think that the Council has selected the most appropriate preferred options?

- * Are the policy requirements justified and do they meet the needs of the local community?
- * Can you suggest a more suitable approach than that outlined?
- * Are there any other alternative options that need to be considered?
- * Do you agree with the findings of the sustainability appraisal assessments undertaken?
- * Do you have any other comments on the preferred options documents?

Please indicate to which document your comments relate to?

Felixstowe Peninsula Area Action Plan

Your comments

*Do you think that the Council has selected the most appropriate preferred options? In short, sorry, but No...

Although one or two small scale sites within the town and Thurman's lane (ref 383f &451f)would seem to be logical extensions of existing past development which, with suitable precautions discussed later, could be seen as acceptable use of land, the three preferred options for the Trimley villages and Walton will fundamentally change their characters.

There are several views, (Vistas if you like) clearly seen as you walk or drive around the area, that positively `define` the demarcation of these three distinct communities.

These demarcation, `vistas, ` can be seen, from the high road, the A14, or both.

If the preferred options, shown are used, then these demarcations and vistas will be lost forever, and a homogenised sprawl, from the sea, to the very edge of the Trimley's will be inevitable.

With further likely expansion taking place during the next stage (2027) there is a high probability that any remaining gaps will be `filled in,` as the precedent will have then been established.

I have indicated these vital sightlines on the modified map at the end, along with possible alternative and equivalent sites I refer to the preferred options (PO)

- 1) for land off Howlett way ref 451c &451d
- 2) land North of High Street, Walton ref 451g
- 3) land opposite Hand in Hand public house ref 451b
- 4) land North of Conway close ref 502e

1)

the SE view from Howlett way looking towards Felixstowe, across agricultural land gives a clear separation, from the substantially developed estates on the other side of this road, looking NW.

This is further reinforced by the view SW across to the Orwell, Albeit, at this stage, outside the red boundaries but in 2027, that too, could change?

The ongoing `Mushroom farm` development, has happily not significantly spoiled this perception of open countryside. This PO area, surrounded by footpaths, is extensively used by local residents of both communities, for horse riding, dog walking, and rambling, precisely` because`, the area, is, undeveloped.

Substantial bird and wildlife thrives within the area and is a valued resource for enjoyment.

A similar area could be produced, if the boundaries were extended north, to the other side of the A14 (shown on modified map - see attached document) that would prevent coalescence along the high road and reduce traffic impact, along the high road substantially, as easy access to A14 is possible.

2) Land North of High Street, Walton ref 451g

The wide demarcation of Walton and Trimley St Mary, is clearly seen and felt, when looking north from the high road, but hardly noticeable (due to banking), when looking South from the A14/A15d.

If this PO is used, Walton will simply merge into one with Trimley St Mary..... Especially as it is opposite an existing, approved planning application for a large development, the result ... Horrible!

However along the N boundary a smaller 'strip' development could, with good tree screening, and substantial setback, still not affect this natural gap too profoundly, giving say 200, 300 homes?

still not affect this natural gap too profoundly, giving say 200 -300 homes?

Again the land north, on the other side of the A14 would give a similar area and have easy access onto the roundabout, still leaving good vistas from the road as shown on my modified map [see attached document].

3) Land opposite Hand in Hand public house ref 451b

The spectacular views, looking South across the country side from the` Hand in hand` area, will be destroyed even if only a single frontage was permitted, and of more concern `allow` an entirely feasible, further expansion to the railway in 2027, once the excursion across the high road is established.

Although fortunately in this case, it would not 'link' two separate communities, just extend one.

However, if the area NE, and opposite Goslings farm were to be used, a similar area with good access would be available, without extending the extent of the village inordinately?

4) Land North of Conway close ref 502e

The other preferred option north of Conway close, looks innocent enough, until again, it is realised that adjacent land to the East, has already been granted planning permission, so the `white` area is somewhat misleading, as that

O - 7264 - 3934 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7264 Object

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

development has already removed the view for the existing residents.

But it use would not appear to coalesce any discreet areas, as 1) and 2) do, so like 3) is mainly the expansion of an existing community.

The two `orange` areas of no permitted development, are certainly needed.(and appreciated)

Of concern however, is once the preferred options are established, it takes no great stretch of imagination to surmise that these two areas of `no development` will be the next to be `filled in` when the AAP is reassessed in 2027.

If that were to take place, any pretext of individual villages and communities would then be farcical.

If alternative options could be chosen, either as suggested or elsewhere by yourselves, it would be far less likely that everything could be amalgamated later.

- * Are the policy requirements justified and do they meet the needs of the local community?
- * Can you suggest a more suitable approach than that outlined?
- * Are there any other alternative options that need to be considered?
- * Do you agree with the findings of the sustainability appraisal assessments undertaken?
- * Do you have any other comments on the preferred options documents?

The other questions posed above require, I feel, a slightly different approach and response.

I have read through countless documents, counter arguments and counter proposals, about the need for this many homes, employment, infrastructure etc, from 2009 until 2012 when the basic framework was established by the government/local government.

These discussions were far more eloquently expressed by the S.T.A.G (Save Trimley Against Growth) and N.A.N.T. (No Adastral New Town) representations, than I could possibly achieve, and yet failed to modify the `official` stance.

Therefore I feel the above battles have been fought and lost long ago, and now we are at the `Damage limitation` stage of the proceedings, although hopefully this will nonetheless be productive.

Similarly the sustainability assessments, apart from being largely unfathomable, use criteria that will always be subjective, and can be `adjusted` to suit the needs of the chosen decision.

These 'battles' have likewise, been argued over and lost long ago.

Finally, It would be naive, not to perceive the hand of Trinity College in all of this, especially since their `Vision` of `their` land was published a few years back, and their `influence` when attempting to realise the maximum return for the land, with no real empathy for everyone affected.

This at least leaves us with at least the possibility of 'tinkering' with the preferred options, using yourselves, as our 'voice' and 'buffer' to make these decisions slightly more 'palatable' to all of us who 'will' be affected.

Therefore my next section will be on those preferred options but here is my take on the areas which may affect less people, but the land may not be that (cynically) chosen by Trinity College.......

[see attached document]

Site Allocations and Area Specific Policies

* Do you have any other comments on the preferred options documents?

As mentioned under my comments on the `Felixstowe Peninsula Area Action Plan`, I am assuming those options, will now likely go ahead regardless, and we are in a sort of `damage limitation` stage?

The preferred options for land off Howlett way ref 451c &451d

I know well the cliché "Not in my backyard" but in this instance it `IS` very much in our backyard, and obviously we/all, the existing tenants who are affected, have a vested interest, especially as we have `in` vested` considerable money and time to live here, and for all the qualities of life, it provides.

Equally, for all my working life, my career was in the building industry, including design and planning, before finally teaching it to HNC level. Therefore I do know, that a well thought out development, can work, and work well, and executed sensitively, need not unduly destroy an area.

So what were the reasons we chose to live here, and what features need to be protected, so that many more can share and enjoy this resource, should they soon live here, with ourselves...?

Well the area where we live has some wonderful and surprising features, which make it, just what it is... Simply put, it is pure Countryside.....

Entering from the high road, and within barely 10m of walking down Thurmans, or Church lane, you immediately disappear into an archetypical `English` setting, unspoilt in a hundred years as evidenced by photos. Leaves and mud on the road greet you as you walk down. The bustle and noise fade rapidly away, and then you emerge into a 100 acre field where fox and rabbits play.

A rich variety of birds sing in the foliage and crops. You give a greeting to a horse and rider, then a walker, for there are many.. Traffic although near, sounds distant, and fails to spoil the setting.., you can enjoy the big skies, with its sunrises and sunsets, or If you chose `Dark` starry nights, with owls, and fox's cries, and distant lights through the rustling trees......,

O - 7264 - 3934 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7264 Object

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

All this, within the boundaries, of three busy roads. A true haven of peace within....

Any future development should endeavour to preserve all of this, especially for the existing tenants, and by incorporating such features, it would surely benefit any new dwellers life too, even if only at its peripheries, for then, they too, could walk with ease into this time warp or jet off down the A14 to town as is their choice, as we do.

There are also two, one hundred year old oaks in the centre that do not appear to have TPOs on them, but would surely be an asset within an open area for the development?

Likewise, a 1940s WW2 `pillbox` remains that should be preserved for posterity, and could easily become a feature within a development, either as a viewing platform (it has steps to a walled roof as it was also an anti aircraft position) or like the control tower at Martlesham Heath, a heritage site with information displays and focus of a park area.

My modified map [see attached document] shows some ideas that could help achieve this, but the simple principals are, to shield old from new, by leaving a broad band of untouched land (say 15m) around the boundaries with a screening of trees, that would preserve countryside views from both sides, and leave all the above, for all to enjoy.... Oh, And soft street lighting PLEASE, for preserving the dark night skies...Most planners, forget that, important feature of the `countryside`

It is paramount (and very much appreciated) that both Church lane, and Thurman's lane, are to be classified as `protected` lanes, and not to be used for access, to any new developments.

These peaceful routes provide part of that countryside experience. Please, cast this decision irrevocably in Stone. Any increase in (vehicle) traffic would destroy them.... Walkers and cyclists welcome...

The orange area to be protected from any developments is also vital to preserving this encircled haven of our countryside, so easily accessible from both Trimley villages.

It will also maintain that important historical separation of them.

Finally, the protected area should, provide an alternative home for the displaced, birds and wildlife, especially if several dead trees are replaced and give that haven of tranquillity for them within, for all of us to enjoy.

Thank you for protecting it, But again, please cast it in stone for all perpetuity, as it is only too easy to `fill it in later`, with the loss of all of the above.

[see atached document for revised maps of following:]

Land off Howlett way ref 451c &451d Land south of Thurmans Lane Ref 383f & 451f

This development, like Howlett way above, will affect existing tenants on three side. But with similar peripheral treatment of screening trees and scrub type band, will again separate both new and old from both directions.

Not allowing Thurmans lane to be used for access will preserve the `haven` of timeless countryside within the orange protected zone for both communities and indeed forms a circular route for both Trimley's

Land North of High Street, Walton Ref 451g

This area provides a clear division between Walton and Trimley St Mary, when looking North from the high road, but barely visible from the A14 /A15b

As this must also be taken in conjunction with the approved development opposite behind Walton hall, it would seem imperative to keep any development screened from the high road.

The old stables and Dutch house, will help this illusion, but need to be extended along the entire High Road frontage, with a decent `set back` to a solid new tree line.

And now to another `vested interest....

The need to have the rifle club relocated before any development can continue (Para 3.27)

Could easily be made redundant, if the club could remain where it is. The club has no desire to move.

It would also provide the buffer mentioned in Para 3.29 and is a natural visual break along with the old stables for demarcation of the areas

Any possible noise issues could be solved with banking and/or trees as with the accepted C13/0967 planning application for elsewhere

For the developer, the small loss of building land would be offset by the ability to start work forthwith. The club has a strong affiliation with Mencap, RNIB and national sports bodies, a real asset to the local populace, that could easily disappear if evicted, as we are never likely to raise enough money to do so..

[see atached document for revised map of following:]

Land North of High Street, Walton Ref 451g

Sunday market site sea Rd ref 1011c

O - 7264 - 3934 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7264 Object

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Although not part of the argument for preserving historic `vistas`(indeed it was once a building)

the choice to develop the Sunday market will deprive the town of one of its significant venues, for tourism, and used by hundreds of local and outside visitors.

The surrounding retailers will undoubtedly lose a significant amount of passing trade and helps keep this area `alive` and clearly part of the tourism area (Para 6.22)

I can find no mention of a similar, alternative site.

[see atached document for photographs of following:]

Havens of peace within Land off Howlett way ref 451c &451d Looking due south from drain and the old Rectory Northern boundary Possible viewing point on 1940s pillbox and the old oaks looking North End of Church lane looking North..wildlife & tranquillity reign within three busy roads

NB unploughed borders are the suggested 15mtr `No man's land Buffer zones

Summary:

The other preferred option north of Conway close, looks innocent enough, until again, it is realised that adjacent land to the East, has already been granted planning permission, so the `white` area is somewhat misleading, as that

development has already removed the view for the existing residents.

But it use would not appear to coalesce any discreet areas, as 1) and 2) do, so like 3) is mainly the expansion of an

existing community.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Preferred Options Public Consultation Response form.pdf

C - 7309 - 3949 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7309 Comment

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Pigeon Investment Management Ltd [3949] Agent: Strutt & Parker (Mr Richard Clews) [3945]

Full Text:

1 INTRODUCTION

1.1 This representation has been prepared by Strutt Parker LLP on behalf of Pigeon Investment Management Ltd in respect of land at Trimley St Martin, Alternative Option Site 3022a in response to the six week public consultation (19th October 2015 to 30th November 2015) on the Felixstowe Peninsular Area Action Plan, Preferred Options Document, hereafter referred to as the Felixstowe Peninsular AAP. It should be read in conjunction with the following documents copies of which are contained within the appendices and summarised in the delivery statement section of this consultation response below:

- * Site Plan;
- * Indicative Layout Plan;
- * Preliminary Drainage Appraisal October 2015;
- * Desk-based Archaeological Assessment;
- * Landscape and Visual Assessment;
- * Preliminary Ecological Appraisal; and
- * Transport Report
- * Phase 1 Contamination Report

2 EXECUTIVE SUMMARY

2.1 As set out in these representations there are some fundamental concerns regarding the soundness of the Felixstowe Peninsular AAP and the Area Specific Policies Development Plan Document (DPD). These relate specifically to the approach adopted and the plan's failure to allocate suitable sustainable sites to address the issues arising from the failure to clearly identify up to date objectively assessed housing need for the District. There appears to be a conflict with Policy SP2 of the Core Strategy (2013) and the requirements of the National Planning Policy Framework(NPPF).

2.2 In respect of the Felixstowe Peninsular AAP, at a site specific level, the concern is that the plan fails to take the opportunity to allocate additional land at Trimley St Martin in accordance with the development strategy set out in the adopted Core Strategy. The site in question, Alternative Option Site 3022a, was identified as suitable in the SHLAA 2014.

It is sustainable, available and deliverable. It would represent a logical extension to the physical development limits of the village. In accordance with the presumption in favour of sustainable development and the need to boost significantly the supply of housing it is contended that it should be included as a Preferred Allocation.

3 POLICY BACKGROUND

3.1 The Site Allocations and Area Specific Policies Development Plan Document Preferred Options Consultation Document, October 2015 has been published for public consultation along with the Felixstowe Peninsular AAP. These two documents seek to provide the policies and allocations necessary to implement the strategic policies set out in the Suffolk Coastal District Local Plan - Core Strategy and Development Management Policies, July 2013 document. Together the Core Strategy, Site Allocations and Area Specific Policies Document and the Felixstowe Peninsula AAP will form the Development Plan for Suffolk Coastal District Council.

3.2 While this representation relates to the Felixstowe Peninsular AAP preferred options document and more specifically proposed allocations in the village of Trimley St Martin, it also has to be considered in the wider context of the planning policy framework for the whole of the District.

4 NATIONAL PLANNING POLICY FRAMEWORK

- 4.1 Paragraph 14 sets out that "a presumption in favour of sustainable development" is at the heart of the Framework and describes this as "a golden thread running through both plan-making and decision taking." It goes on to state that for plan- making this means:
- * "Local planning authorities should positively seek opportunities to meet the development needs of their area;
- * Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change..."

These requirements are repeated in more detail throughout the Framework. Paragraph 15 requires the presumption in favour of sustainable development to be applied to local plan policies so that development which is sustainable can be approved without delay.

- 4.2 The Core Planning Principles set out at paragraph 17 include a set of overarching objectives which should underpin plan making. Of particular relevance to this consultation response are that planning should be:
- * plan-led with up to date plans providing a practical framework for predictable and efficient decisions.
- * Not be about scrutiny but be a creative exercise.
- * Proactively drive sustainable development to deliver the homes the country needs.
- 4.3 Every effort should be taken to objectively identify and meet the needs of the area. Sufficient land suitable for development having regard to market signals should be
- 4.4 Paragraph 47 sets out a clear challenge to local planning authorities "to boost

significantly the supply of housing..." In order to achieve this they should ensure

that their Local Plan meets the full objectively assessed needs for the area and they should identify and annually update their five year housing supply.

4.5 For plan-making paragraph 151 advises that Local Plans should be consistent with the policies and principles of the Framework, "...including the presumption in favour of sustainable development."

C - 7309 - 3949 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7309 Comment

Housing

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- 4.6 Paragraph 154 requires Local Plans to be "...aspirational but realistic" and paragraph 159 reminds local planning authorities that they "...should have a clear understanding of housing needs in their area."
- 4.7 Finally, for a local plan to be found sound at examination by an independent inspector the Framework at paragraph 182 advises that it should satisfy the following tests, namely that it is:
- * "Positively prepared the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- * Justified the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- * Effective the plan should be deliverable over its period and based on effective joint working on cross- boundary strategic priorities; and
- * Consistent with national policy the plan should enable the delivery of sustainable development in accordance with the policies in the Framework."
- 4.8 For the purposes of this consultation it is necessary to consider whether the Felixstowe Peninsular AAP satisfies the above objectives.

5 APPROACH TO HOUSING GROWTH

Core Strategy

5.1 At the strategic level housing numbers and distribution are set out in the Core Strategy.

Objective 2 states:

"To meet the minimum locally identified housing needs of the district for the period 2010 to 2027, taking into account existing and future economic, environmental and social opportunities and constraints"

In respect of this objective there are two important points to note. Firstly, that the Core Strategy seeks to meet the minimum locally identified housing need, and secondly, that it is a locally identified housing need for the plan period. 5.2 However, it is considered given the acknowledged short fall that the DPD and AAP should be based on the NPPF principles set out above including; to be aspirational; provide flexibility; positively seek to meet identified needs; and most importantly, to significantly boost housing supply. It is therefore considered that the Felixstowe Peninsular AAP should be setting its own, up to date and ambitious objectives.

5.3 Core Strategy policy SP2 sets out housing numbers and distribution. However, policy SP2 notes that provision will be made for at least 7,900 new homes, distributed in accordance with the settlement hierarchy set out in policy SP19. The policy then goes on to commit to an early review in order to identify the full objectively assessed housing needs for the District, to ensure this is met in so far as this is consistent with the policies of the NPPF.

5.4 The Inspector's report in respect of the Core Strategy Examination (June 2013) made it clear that an early review was essential as at the time the Council had identified an objectively assessed need of 11,000 dwellings. At paragraph 46 of the Inspector's Report he commented:

"Even if the theoretical capacity of all the sites included in the Strategic Housing Land Availability assessment (SHLAA), existing commitments potential brownfield opportunities, allocations carried forward from the previous Local Plan and a windfall allowance were taken into account, the provision would fall some way short of the 11,000 dwellings required."

5.5 At this point, the Inspector clearly gave consideration to suspending the Examination. However, he concluded that as none of the adjoining Councils had objected to the scale of housing proposed, that having a core strategy in place with an early review would be preferable to the alternative of suspension of the examination and the likely withdrawal of the plan.

5.6 While it is noted that the Site Allocations and Area Specific DPD Issues and Options consultation commenced in 2015, it is of significant concern that this occurred ahead of the objectively assessed housing needs for the District being reviewed, updated and firmly established. Policy CS2 states:

"An early review of the Core Strategy will be undertaken, commencing with the publication of an Issues and Options Report by 2015 at the latest. The review will identify the full, objectively assessed need for the District and proposals to ensure that this is met in so far as this is consistent with the policies in the National Planning Policy Framework."

5.7 On the basis of the currently available information the Felixstowe Peninsular AAP and the DPD are inconsistent with this adopted policy, and paragraph 158 of the NPPF which requires that the Local Plan is "...based on adequate, up-to-date and relevant evidence..."

5.8 Table 3.1 of the Core Strategy references the need for an extra 11,000 dwellings as identified in the work commission by Oxford Economics (OE) in 2010. It goes on to suggest that the review should identify land to meet the current acknowledged shortfall between the locally assessed requirement and the OE objectively assessed need (OAN). However, the District still does not appear to have a published understanding of its current OAN. The OE figure of 11,000 dwellings is very old and predates the NPPF. As advised in Planning Practice Guidance regarding housing need assessments, the household projections published by the Department for Communities and Local Government provide the starting point estimate of overall housing need (ID: 2a-015-20140306). The DCLG estimate may require adjustment to reflect factors affecting local demography and household formation rates. However, the Sub National Household Projections (2015) suggest a growth of 8,362 for the period 2010 to 2027 and this is not

referenced in the SAASP document or the AAP. This indicates that the Core Strategy figure promoted in the SAASP is out of date. While the DCLG figure is lower than the OE figure, it is clear that the Core Strategy proposal to provide 7,900 homes is lower than the most recent projections that the Council should be considering as a starting point for

C - 7309 - 3949 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7309 Comment

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understanding its OAN. On the basis that the 2010 OE figure was 11,000, the reality is that the actual objectively assessed need figure is likely to be higher than 8,362 and that 7,900 would fail to meet the OAN.

5.9 Policy FPP1 of the Felixstowe Peninsular AAP gives the impression that it is still working to the Core Strategy target of 7,900 and does not explain if it is actually working to the OE figure or some other estimate and if so what that actually equates to for the AAP. On this basis there must be a concern that at examination the Felixstowe Peninsular AAP will not be found to comply with the tests set out in paragraph 182 of the NPPF, failing all the tests.

Five Year Housing Supply

5.10 In June 2015 Suffolk Coastal District Council published a Housing Supply Land Assessment. This covers the period 1st April 2016 to 31st March 2021 and identifies the current position with regard to identifying a five year +5% supply of housing land which it assess as 5.12 years.

5.11 Paragraph 3 acknowledges the supply in 2014 was 4.3 years this is a figure which has been borne out in appeal decisions as recently as September 2015

(APPJ3530/A/14/2225141). Fundamentally, the current assessment is still based on the Core Strategy target of 7,900. As set out above, this is an acknowledged under estimate of the actual objectively assessed need, which in the absence of anything more up to date, on the best available evidence suggests a target in the region of 11,000 dwellings. 5.12 In addition, it is also observed that the projections contained in table 3 still appear to rely on the early unconfirmed delivery of some large developments with outline permission which are still subject to S106 agreements. Taking these factors into consideration the five year supply with a modest surplus of 0.12 years, must reasonably be considered vulnerable to challenge at this time. If the 11,000 dwelling figure or even the lesser DCLG Household projection of 8,362 are applied then a five year supply in all probability does not actually exist and is at best 4.75 years.

5.13 Again, this point suggests that the Felixstowe Peninsular AAP will struggle to

demonstrate compliance with paragraph 182 of the NPPF at examination and reinforces the need to allocate additional land within the AAP.

Felixstowe Peninsular AAP

5.14 The overall spatial strategy set out in the Core Strategy (see policy SP2) provides for development to be focused in the Eastern Ipswich Plan Area, at Felixstowe and the Trimley Villages and shared between the market towns. Policy SP19 identifies that Felixstowe, Walton and the Trimley Villages will accommodate a proposed housing growth of 22%. Furthermore the Strategic Housing Land Availability Assessment (March 2014) acknowledges:

"The core Strategy expects the Market Towns and the Felixstowe and the

Trimleys area to accommodate a considerable proportion of the growth identified for the district to 2027".

5.15 The Felixstowe Peninsula AAP in policy FPP1 identifies a minimum requirement for a further 807 units before 2027 as necessary to meet the Core Strategy requirement. However, as previously mentioned above these figures are a minimum and the AAP should be seeking to maximise delivery in sustainable locations in order to boost significantly the supply of housing as required by the NPPF. It is therefore contended as set out in more detail above, that policy FPP1 should be setting a more ambitious target, and in the absence of any more recent objectively assessed need, looking to a District target of 11,000 dwellings rather than the 7,900 derived from the Core Strategy. Policy FPP1 should therefore be reworded to identify a higher overall target and as such an appropriate apportionment, for Felixstowe Peninsular. 5.16 It must be acknowledged that the AAP states at paragraph 3.13:

"The Felixstowe Peninsula AAP identifies over 1,100 units on the preferred sites outlined in this document. The Council consider it necessary to over allocate sites across the district to ensure that a five year land supply is maintained which is paramount. Over allocating also provides a range of sites, sizes and locations for development to allow a choice of location for those looking for a residential property. It also takes into account that the population is growing and that the Council's objectively assessed housing need is likely to increase in the future.

The delivery of sites will be monitored throughout the plan period to consider how the AAP is performing against the Core Strategy targets."

5.17 While this additional provision is welcome, it is still unclear if it will provide sufficient sites, which are available and deliverable, to enable the District to demonstrate a five year housing land supply in the short term. The current five year supply is not based on an up to date objectively assessed need. It is therefore contended, that opportunities should be taken to allocate more sustainable sites that can be delivered in accordance with Core Strategy spatial strategy so that the District can significantly boost its supply of housing as required by the NPPF. These sites should allow for variety in house types and

tenures to come forward to meet local needs and ensure choice and competition in the market for land (NPPF paragraph 47).

5.18 From the statement in paragraph 3.13 the Council appears to be acknowledging that the objectively assessed need is rising and site allocations should reflect this. It would therefore seem logical, and in the interests of good planning, for them to plan to meet this need now, by way of the allocation of further sustainable sites.

Felixstowe Peninsular AAP Preferred Site Allocations

5.19 The Felixstowe Peninsular AAP identifies 7 sites as preferred option allocations. Two of these are in Trimley St Martin and one in Trimley St Mary and are identified on the inset maps in the AAP. A summary of the 7 sites is set out below along with some brief summary observations in italics which are considered relevant to this consultation response: 5.20 Preferred Policy FPP3: Land at Sea Road, Felixstowe

Land is identified at Sea Road, Felixstowe for a mixed use development of commercial /tourism uses and residential dwellings. (Indicative Capacity 40 dwellings)

C - 7309 - 3949 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7309 Comment

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

It is noted that this is a mixed use site and residential development will be dependent on

There is also an issue with sewage capacity which may impact on viability. Finally if the market has to be relocated this could also significantly delay delivery.

5.21 Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

Land is identified north of Walton High Street for a mixture of residential units; including on site open space,

comprehensive landscaping and new business units. (Indicative Capacity 400 dwellings)

This site is dependent on the Rifle Club being relocated, requires a master plan to

include a link road which could in turn impact on viability. The policy acknowledges that it is likely to be a longer term opportunity. There are also air quality and sewage capacity issues to be resolved.

5.22 Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Land is identified to the north of Conway Close for a residential development. (Indicative Capacity 150 dwellings) The site could come forward, however, there are still sewage capacity and air quality issues to be addressed and the site is adjoined by heritage assets.

5.23 Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St

Martin Land is identified on Trimley High Road for residential development with on site open space to provide a village green. (Indicative Capacity 70 dwellings)

The site could come forward with access on to the High Street. The Public House is a listed building and therefore development proposals will have to be sensitive to its status which may limit capacity.

5.24 Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

Land is identified at Howlett Way for residential development with on site open space. (Indicative Capacity 360 dwellings)

Access to the site has not been identified in detail other than off Howlett Way. There are air quality issues and concerns regarding the setting of the Old Rectory. In addition there is a water main crossing the site. The site wraps round the Old Poultry Farm and the Old Rectory both of which may delay availability.

5.25 Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

Land is identified south of Thurmans Lane for residential development. (Indicative

Capacity 100 dwellings)

This site could come forward, again it is subject to air quality issues and the need to have regard to Mill Farm a Grade II Listed Building, it will also have to be accessed through the adjoining residential areas.

5.26 Preferred Policy FPP9: Land at Bucklesham Road, Kirton

Land is identified south of Bucklesham Road for residential development. (Indicative Capacity 15 dwellings)

This is a relatively small ribbon development site which could come forward. There are potentially issues to be resolved in respect of local sewage capacity in the village.

Assessment of Preferred Allocations

5.27 If the preferred site allocations indicative capacities are totalled up cumulatively this suggests they could deliver 1,135 dwellings between them. However, as set out above the delivery, and more importantly, the quantum and likely timing of delivery is much less certain. It is noted that the two largest sites, FPP8 and FPP4 do not appear to be very advanced. With this in mind in order to maintain a realistic five year supply it will be important for the District to maintain the delivery of smaller sites which can readily come forward.

6 ALTERNATIVE OPTION SITE 3022A

6.1 The site the subject of this representation, Alternative Option Site 3022a is just such a site and accordingly it is contended that it should be included as a preferred allocation on the basis that it is available and deliverable at the present time. In addition, it does not need to overcome the issues and constraints associated with some of the preferred allocations set out above and as such can contribute to the acknowledged shortfall in housing need, within the first five years of the Plan period. It is also contended that the AAP should be more ambitious in order to meet local housing need and it would be appropriate for the site to be included based on the presumption in favour of sustainable development

6.2 When considering the Trimley Villages and the opportunities for further allocations, Trimley St Mary is the larger of the two settlements and any significant further expansion may potentially undermine the sustainability of it as a village. Trimley St Martin being the smaller of the two settlements would appear to have greater capacity to absorb further growth. Trimley St Mary is also constrained by its proximity to Felixstowe, the ANOB designation to the south-west, the A14 to the north-east and its proximity to Trimley St Martin to the north. There are therefore few obvious alternative locations for the expansion of its physical development limits. On this basis, there is considerably more potential to be looking at a further extension of the physical development limits of Trimley St Martin.

6.3 In so far as this consultation is concerned, clearly a further allocation on the northwestern side of Trimley St Martin would make a positive contribution towards housing delivery. Alternative Option Site 3022a is in a sustainable location and is not environmentally sensitive. It does not represent a risk of coalescence and is a natural and logical extension of the settlement with clear and defensible boundaries. It is contained to the north-east by the allotment gardens, by the existing built development in the western corner, the road and established settlement to the south. As set out below it is a deliverable site with no obvious constraints or limitations. It is available and could come forward very quickly to make an almost immediate contribution to boosting local housing supply. As such, it is considered that it should be identified as a preferred

residential site allocation.

Sustainability Appraisal

6.4 It is surprising that Alternative Option Site 3022a did not score more highly in the Preferred Options Sustainability Appraisal when compared to the preferred sites listed above.

C - 7309 - 3949 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

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6.5 The overall assessment concluded for site 3022a as follows:

"The site scores well in terms of economic effects due to its close proximity to employment opportunities and given relatively good public transport provision. The loss of Grade 2 agricultural soil results in a major negative environmental effect. However, there may be scope for mitigation."

6.6 In response to the major negative environmental effect of using Grade 2 agricultural land, it is clear that there is no difference with the conclusions for a number of preferred allocations. The proposed site is on the boundary of grade 2/3 agricultural land. All undeveloped and proposed allocation sites within Trimley St.Mary and Trimley St.Martin are on Grade 2 Agricultural Land. The proposed site is therefore no more important for protection as agricultural land than the allocated sites and may in fact be less desirable due to the size of the site and the overall quality. One of the objectives where the site did not score very favourably was in respect of SA Objective 8, to improve the quality of life and where people live. The SA comment here incorrectly assumed that the site will be accessed via the adjoining estate roads and as such could potentially result in a negative

impact for local residents. The reality, as set out in more detail in the delivery statement below, is that access can be provided directly on to High Road.

6.7 In respect of the site assessments and commentaries for the preferred allocations set out in the AAP, there appear to be a number of reoccurring themes which do not necessarily appear to be reflected in the sustainability appraisals. These are as follows:

Air Quality: This is clearly an issue with air quality assessments being required for the majority of the preferred allocation sites. This is an issue, particularly associated with proximity of the sites to the urban area of Felixstowe and major transport routes including the A14. In respect of the majority of the preferred allocations, and in particular the largest sites, these are more closely related to the A14 and Felixstowe than Alternative Option Site 3022a. As such, simply on the basis of the degree of separation, it can be concluded that site 3022a will perform better in respect of air quality.

Sewage Capacity: Sewage capacity is an issue raised by Anglian Water in respect of the Felixstowe sites and the site in Kirton. These sites potentially require improvement to the capacity of the foul sewer network. This does not appear to be an issue for the Trimley Villages and as set out in the delivery strategy below a preliminary foul and surface water drainage strategy has already been prepared for Alternative Option Site 3022a.

Noise: The potential impact of noise does not appear to have been given much consideration. It should be noted, that some of the preferred allocations lie adjacent to junctions on the A14. These sites or parts thereof may be susceptible to noise disturbance which may require mitigation and/or potentially reduce the developable area. Alternative Option Site 3022a, lies to the south of the A14 separated by the established allotment gardens and as such is unlikely to be adversely affected by noise from the road.

Transport Assessments: The larger preferred option allocations will require transport assessments to be carried-out. These may potentially reveal highway safety or capacity issues which could impact on the quantum of development achievable and delay delivery. This would not be necessary with the scale of development proposed on Alternative Option Site 3022a.

Heritage Assets: A number of the preferred option sites have a close relationship with existing heritage assets. In some cases the SA scored these relationships to be positive on the basis that the setting may be improved. It does not necessarily seem reasonable that a site that will have an impact on heritage assets should score more highly than one where heritage assets are unaffected as is the case with Alternative Option Site 3022a.

6.8 In conclusion it is clear from the above that Alternative Option Site 3022a has many advantages over some of the preferred allocation sites and there are no obstacles to it coming forward for development. It is in a sustainable location and could readily deliver much needed housing, including affordable housing, a significant social benefit, with very limited environmental consequences. This assessment further supports the case that it should be included as a preferred allocation.

Deliverability

6.9 Trimley St Martin lies to the west of Felixstowe, between the A14 to the north-east and the railway line to the south-west. The village of Trimley St Mary lies immediately to the south east separated by a small gap. The 2011 Census reported the population of Trimley St Mary as 3,673 and the population of Trimley St Martin as 1,932. The two villages are immediately adjacent to Felixstowe and identified in the Core Strategy as Key Service Centres due to their extensive range of facilities and proximity to Felixstowe.

6.10 Alternative Option Site 3022a, is situated on the north-western side of the village. It lies to the east of High Road, which runs parallel with the A14, connecting Felixstowe via the A1156 to Ipswich. The south-eastern side of the site abuts the residential properties of Mill Close with extensive allotment gardens lying to the north-east. The western corner of the site contains a group of existing dwellings and buildings used for commercial purposes. Beyond the site to the north-west are arable fields.

6.11 The site was in part submitted and considered under the SHLAA 2014 (site 383a) it was discounted due to concerns regarding vehicle access. Mill Close was not considered to be suitable as an accesses route and the Highway

C - 7309 - 3949 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

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Authority was not in favour of direct access from High Road.

6.12 Since 2014 extensive work has been undertaken by Pigeon Investment Management Ltd to overcome the concerns relating to access and demonstrate the sites deliverability. A summary of the work to date is set out below which demonstrates the site's deliverability.

Indicative layout plan

6.13 An indicative layout plan, drawing number 015 - 015 - 00 has been prepared for the site (see Appendix). This shows how the site could be developed to deliver a range of house types including 18 affordable units. The proposed layout demonstrates that the site can deliver housing which respects the surrounding pattern of development. A strong frontage along high Road will provide a connection between the existing settlement and the group of existing buildings to the west of the site. This will be focused around the new highway access which will create an attractive and framed entrance into the development. The internal layout picks up on pedestrian connectivity through to Mill Close providing some additional frontage plots in the eastern corner of the site.

Elsewhere the proposed dwellings and street layout seeks to extend the established pattern of buildings along the site boundaries. Open space and gardens are provided along the north-eastern boundary in order to respect the presence of the allotment gardens. A large area of open space to serve the development (and the existing village) is proposed to the north which will provide a sensitive edge and integration with the open farm land beyond.

6.14 The layout demonstrates that an appropriate density of development can be provided along with a range of house types. The proposed layout can also meet garden space requirements and parking provision while respecting the amenities of adjoining residential properties.

Affordable Housing

6.15 The indicative layout shows the site could include 18 affordable units, including a variety of house types and sizes to meet local need. This will be a significant local benefit.

Heritage Assessment

6.16 The site does not lie with or adjacent to a conservation area and there are no Listed Buildings or other Heritage Assets on or nearby.

6.17 A desk-based assessment of archaeological significance was undertaken in November 2015. This report concludes that there is no evidence that proposed development will have any impact on the significance or setting of designated heritage assets of archaeological interest. It suggests that development could have an impact on the significance of undesignated heritage assets indicated by crop marks but that their significance is unlikely to be sufficient to preclude development and impact on them may be mitigated by the formulation of an appropriate archaeological strategy.

Flood Risk

6.18 The entire site is located within Flood Zone1; land assessed as having a low probability of flooding from fluvial sources. In addition, the site is not identified to be at risk from surface water or reservoir flooding, according to the Environment Agencies Flood Maps for Planning.

6.19 The development will not increase the risk of flooding post development as attenuation measures will be provided on site as part of the proposal to accommodate surface water run-off generated from the critical duration 1 in 100 year event, including an allowance for climate change.

Drainage Strategy

6.20 A preliminary drainage strategy has been prepared for the site which concludes that foul water from the development will be able to flow via gravity to the existing Anglia water sewer located in the High Road.
6.21 In respect of surface water drainage the underlying geology is expected to be of high permeability which will allow surface water run-off to discharge via infiltration. It identifies that an infiltration basin can be provided within the public open space to accommodate surface water run-off from the proposed highway. The surface water from roofs can be discharged via soakaways with permeable paving included to drain the private access roads, parking areas and driveways.

Landscape and Visual Assessment

6.22 A landscape and visual assessment of the site has been carried out and it concludes that there is capacity within the landscape to absorb change.

6.23 It suggest that given the nature, character and visual quality of the existing settlement edge and the poor quality of the existing edges of the site, it has a High Capacity to accommodate change, and the potential to enhance the settlement edge.

6.24 As such there are few constraints or issues in landscape and visual terms that would prevent the site being considered for development.

Preliminary Ecological Appraisal

6.25 A preliminary ecological appraisal has been carried out for the site. Ten habitats were identified during the Extended Phase 1 Habitat Survey including scattered broadleaved and coniferous trees, scattered scrub, poor semi-improved grassland, scattered bracken, tall ruderal, arable, introduced shrub, and species-poor intact and defunct hedgerows. In addition the field margins on-site provide opportunity for common invertebrates, reptiles, birds, and foraging / commuting bats. The report makes a series of recommendations in respect of mitigation measures and good practice during development however, no Phase 2 survey work was required. It is clear that there are no ecological barriers to the

sites development.

C - 7309 - 3949 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7309 Comment

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Transport Report

6.26 Å transport report has been prepared for the site which concludes that the proposed development can be served by an acceptable access to the highway network. The report confirms that the site is located in a sustainable location with bus stops on the boundary providing frequent services and footway connections to local facilities.

6.27 A new access can be provided onto High Road which complies with highway standards and provides adequate visibility and capacity. The existing local infrastructure can support the additional traffic generated, including through the use of more sustainable modes of transport as alternatives to the private motor car, such as cycling, walking and public transport.

6.28 The transport report confirms that access can be provided directly onto High Road and that it will not be necessary to take access via Mill Close as assumed in the assessment of the SHLAA 2014 (site 383a). This therefore overcomes the key reason for the site being discounted due to concerns regarding vehicle access.

7 CONCLUSION

7.1 As set out above and referred to elsewhere in this consultation response Alternative Option Site 3022a is available and deliverable. There are no obstacles to its development and clearly proposals are at an advanced state. The indicative layout confirms that a policy compliant scheme can be delivered which will include market and affordable housing, a large area of open space and improved connectivity.

7.2 As indicated in the landscape and visual assessment, the proposed development will be an attractive addition to the settlement, improving the quality of existing north western edges of the village.

7.3 The site is not in a flood risk area and can be suitably served by both foul and surface water drainage.

7.4 Development of the site will have no impact on designated heritage assets and any impact on undesignated assets can be mitigated. Additionally, there are no ecological barriers to the sites development.

7.5 The site is in a sustainable location with good access to local services and facilities. A new point of vehicle access, which accords with adopted standards, can be provided to High Road overcoming the original reason for the site being discounted in the SHLAA 2014 (site 383a).

7.6 Policy FPP1 of the Felixstowe Peninsular AAP is still working to the Core Strategy target of 7,900 rather than the 11,000 OE figure or an up to date objectively assessed need, as required by Core Strategy Policy SP2. In addition, the current five year supply is not based on an up to date objectively assessed need. It is therefore contended, that the Felixstowe Peninsular AAP should take the opportunity to allocate more sustainable sites that can be delivered in order to meet the requirement of the NPPF to "significantly boost its supply of housing" and assist in the maintenance of a five year supply of housing land.

These sites should allow for variety in house types and tenures to come forward to meet local needs and ensure choice and competition in the market for land (NPPF paragraph 47).

7.7 In conclusion, it is clear that Alternative Option Site 3022a has many advantages over some of the preferred allocation sites and there are no obstacles to it coming forward for development. It is in a sustainable location and could readily deliver much needed housing, including affordable housing, a significant social benefit, with very limited environmental consequences. It does not represent a risk of coalescence and is a natural and logical extension of the settlement with clear and defensible boundaries.

7.8 For the reasons set out above it is clear that Alternative Option Site 3022a should be included as a preferred allocation in the Felixstowe Peninsular AAP.

APPENDICES [see attached documents]

See Attachments to Representation Submission for following documents:

- A. Location Plan
- B. Indicative Layout Plan
- C. Preliminary Drainage Appraisal (October 2015)
- D. Desk-based Archaeological Assessment
- E. Landscape and Visual Assessment (November 2015)
- F. Preliminary Ecological Appraisal
- G. Transport Report
- H. Phase 1 Contamination Report

Summary:

Land is identified to the north of Conway Close for a residential development. (Indicative Capacity 150 dwellings) The site could come forward, however, there are still sewage capacity and air quality issues to be addressed and the site is adjoined by heritage assets.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

Appendix C - Prelimiary Drainage Appriasal Nov 15 trimley.pdf

Appendix E - FR 3659 Figure 3 Landscape and Heritage Designations and Public Rights of Way.pdf

Appendix A - Location Plan Trimley.pdf

Appendix B - Indicative Layout Plan (015-015-002).pdf

Appendix E - FR 3659 Figure 1 Site Plan with Photo Locations(1).pdf

C - 7309 - 3949 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7309 Comment

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Appendix F - preliminary Ecology Appraisal Trimley.PDF

Appendix G - Transport Statement (November 2015).pdf

Appendix E - Landscape and Visual Assessment Summary November 2015.pdf

Appendix C - Prelimiary Drainage Appriasal Oct 15 trimley.pdf

Appendix E - FR 3659 Figure 4 Landscape Charcter Assessment.pdf

Appendix E - FR 3659 Figure 5 Photosheets_LR.pdf

Appendix H - Phase 1 Contamination Report (Pt2).pdf

Appendix E - FR 3659 Figure 2 Statutory Designations(1).pdf

Appendix D - Trimley St Martin Desk Based Archaeological Assessment.pdf

Appendix H - Phase 1 Contamination Report (Pt1).pdf

C - 7383 - 3952 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7383 Comment

Housing Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Respondent: Anglian Water (Mr Stewart Patience) [3952] Agent: N/A

Full Text:

Thank you for the opportunity to comment on the Site Allocations and Area Policies Preferred Options Document and Felixstowe Peninsula Area Action Plan. Please find enclosed comments on behalf of Anglian Water.

Site Allocations and Area Specific Policies Preferred Options Consultation Document

Policy SSP3: Land rear of Rose Hill, Saxmundham Road Aldeburgh

Anglian Water has no objection to the proposed allocation of this site for open market housing and a care home.

Paragraph 2.28 (page 30)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.28 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP4: Land at Mill Road Badingham

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.32 (page 32)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.32 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP5: Land Adjacent to Corner Cottages, Main Road, Benhall

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP6: Land south of Brook Cottage, Benhall

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.35 (page 34)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.35 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP7: Land opposite Townsfield Cottages, Dennington

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.40 (page 37)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.40 should be amended to refer to the management of surface water run off in

C - 7383 - 3952 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7383 Comment

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

accordance with the surface water management hierarchy.

Policy SSP8: Land south of Ambleside, Main Road, Kelsale cum Carlton

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.46

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.46 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP9: Land north of Mill Close, Orford

It is expected that there may be a need for improvements to the sewerage treatment capacity to enable the development of this site.

Policy SSP10: Land west of Garden Square Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP10:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP11: Land rear of 3 -33 Suffolk Drive, Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP11:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP12: Land north-east of Street Farm

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP12:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP13: Land fronting Old Homes Road, Thorpeness

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP13:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP14: Land south of Lower Road Westerfield.

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP15: Land at Old Station Works, Main Road Westerfield

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP15:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP16: Land at Street Farm, Witnesham (Bridge)

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP17: Land south of the primary school, Witnesham

Anglian Water has no objection to the proposed allocation of this site for residential development.

C - 7383 - 3952 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7383 Comment

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Policy SSP18: Ransomes, Nacton Heath

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP13:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP19: Land at Silverlace Green(former airfield) Parham

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required.

Therefore it is recommended that these issues are investigated further and Policy SSP19 is amended accordingly.

Policy SSP20: former airfield Parham

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required.

Therefore it is recommended that these issues are investigated further and Policy SSP20 is amended accordingly.

Policy SSP21: former airfield Debach

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required. Therefore it is recommended that these issues are investigated further and Policy SSP21 is amended accordingly.

Policy SSP22: Bentwaters Park, Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP22:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP23: Carlton Park, Main Road, Kelsale cum Carlton

Anglian Water has no objection to the proposed allocation of this site for employment development.

Policy SSP24: Levington Park, Levington

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP24:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP25: Riverside Industrial Estate, Border Cot Lane, Wickham Market

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP25:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP31: Snape Maltings

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site for arts, recreation and tourism related development. It is therefore suggested that the following text should be include in Policy SSP25:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Felixstowe Peninsula Area Action Plan Preferred Options Consultation document

Policy FPP3:Land at Sea Road, Felixstowe

C - 7383 - 3952 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7383 Comment

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP4: Land north of Walton High Street, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP5: Land north of Conway Close, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is therefore suggested that the following text should be include in Policy FPP6:

'Improving the capacity of the foul sewerage network'

Policy FPP7: Land off Howlett Way, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is therefore suggested that the following text should be include in Policy FPP7:

'Improving the capacity of the foul sewerage network'

Policy FPP8: Land off Thurmans Lane, Trimley St Mary

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP8:

'Improving the capacity of the foul sewerage network'

Policy FPP9: Land at Bucklesham Road, Kirton

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Policy FPP9 refers to 'reinforcement of connections'

The term reinforcements is normally used in the context of water mains and not foul sewers when referring to improvements within the network.

It is therefore suggested that the following text should be include in Policy FPP9:

'Improving the capacity of the foul sewerage network through reinforcement of connections by making necessary improvements to ensure that capacity can be made available'

Policy FPP10: Port of Felixstowe

It is noted that it proposed to allocate land at the Port of Felixstowe for strategic employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Policy FPP11: Land at Bridge Road, Felixstowe

It is noted that it proposed to allocate land at Bridge Road for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Policy FPP12: Land at Carr Road/Langer Road, Felixstowe

It is noted that it proposed to allocate land Carr Road/Langer Road for employment uses.

C - 7383 - 3952 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7383 Comment

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP12:

'Improving the capacity of the foul sewerage network'

Policy FPP13: Land at Haven Exchange, Felixstowe

It is noted that it proposed to allocate land at Haven Exchange for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP13:

'Improving the capacity of the foul sewerage network'

Summary:

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Change to Plan

Appear at exam?
Not Specified

Legal?
Not Specified

Sound? Not Specified

Duty to Cooperate?Not Specified

Soundness Tests

None

O - 7459 - 3988 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7459 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mrs S M Gould [3988] Agent: N/A

Full Text: It is dangerous for elderly people crossing Colneis Road at School times, with lots of parked cars and a few "speeding

mums".

With the possibility of heavy lorries using Upperfield Drive as a "rat run" when people are backing out of their garages and the lay-bys, it would follow that the weight of the lorry could not stop in time and could easily cause a fatal accident.

It is dangerous for elderly people crossing Colneis Road at School times, with lots of parked cars and a few "speeding

mums"

With the possibility of heavy lorries using Upperfield Drive as a "rat run" when people are backing out of their garages and the lay-bys, it would follow that the weight of the lorry could not stop in time and could easily cause a fatal accident.

Change to Plan

Summary:

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7497 - 4019 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7497 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mrs S Brown [4019] Agent: N/A

Full Text:

I wish to object to the proposals to include the field north of Conway Close / Swallow Close in the area action plan for

old Felixstowe.

My objection is that a tranquil and idyllic area of old Felixstowe would be taken away and replaced with noise and pollution from additional cars and site traffic the scale of this suggested development could have a serious impact on the road safety of walkers, cyclists and school children.

This is an area of outstanding natural beauty and if lost, can never be regained. There is quality of life here which is rare and I, for one, wish to preserve it.

The field has been used for food production for many years and with an ever growing population this should be given serious consideration.

There are many other reasons why this area should not be chosen, such as exhausted sewerage systems, inadequate road structure, lack of employment, pressure on schools and medial centre, which I feel sure that other local residents will cover.

My main concern is to have my objection noted. A Government or Council will only be in power for a limited time but the countryside should be for us all to share for a lifetime. Please help to preserve the area for future generations to enjoy.

Summary: This is an area of outstanding natural beauty and if lost, can never be regained. There is quality of life here which is rare and I, for one, wish to preserve it.

The field has been used for food production for many years and with an ever growing population this should be given serious consideration.

There are many other reasons why this area should not be chosen, such as exhausted sewerage systems, inadequate road structure, lack of employment, pressure on schools and medial centre, which I feel sure that other local residents will cover.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7505 - 4023 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7505 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: NA NA [4023] Agent: N/A

Full Text: The residents of Upperfield Drive do not want heavy lorries using their narrow road. It has 2 dangerous bends.

Summary: The residents of Upperfield Drive do not want heavy lorries using their narrow road. It has 2 dangerous bends.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7506 - 4024 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7506 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: S & M Mackett [4024] Agent: N/A

Full Text: We are residents of Ferry Road and have been for the last 37 years. We strongly object to your proposal to build this

amount of houses in this quiet country road and area, also particularly the amount of cars and traffic this would create only having one exit on to our narrow country Ferry Road. We already have daily problems with parents coming and going from all areas of Felixstowe to Kingsfleet School causing parking and congestion problems, in Ferry Road. The proposed site would also put a huge strain on residents existing services. Therefore we suggest your Planning Team

look again at the problems involved.

Summary: We are residents of Ferry Road and have been for the last 37 years. We strongly object to your proposal to build this

amount of houses in this quiet country road and area, also particularly the amount of cars and traffic this would create only having one exit on to our narrow country Ferry Road. We already have daily problems with parents coming and going from all areas of Felixstowe to Kingsfleet School causing parking and congestion problems, in Ferry Road. The

proposed site would also put a huge strain on residents existing services.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7514 - 4030 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7514 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mrs Doris White [4030] Agent: N/A

Full Text: I oppose to the building behind Conway Close/Swallow Close as the increase in traffic noise will be disturbing to the

local residents. Heavy lorries will be causing a huge amount of disruption to our usual quiet area especially at school

drop off/pick up times when the vehicles could be using Upperfield Drive as a short cut.

Summary: I oppose to the building behind Conway Close/Swallow Close as the increase in traffic noise will be disturbing to the

local residents. Heavy lorries will be causing a huge amount of disruption to our usual quiet area especially at school

drop off/pick up times when the vehicles could be using Upperfield Drive as a short cut.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7515 - 1520 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7515 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Annelise & Ian White [1520] Agent: N/A

Full Text:

I am writing in respect to the 'Preferred Options Public Consultation' particularly about proposed developments on the Felixstowe Peninsula. I feel that the planning team should resist from the option of filling the only remaining site on the peninsula which has not been developed. The reasons for this petition are as follows:

- 1. There is no other rural lane on the peninsula not polluted by the noise and fall-out from the port. Gulpher Road is accessible to people of all mobilities to enjoy open fields, and escape the centres of population. This is very important with the density of building in the town and surroundings.
- 2. Any development on the peninsula would result in increasing traffic flow through the town, and would make work journeys more difficult. The siting of the Felixstowe Academy has distorted access to many other destinations because of the concentration of cars at certain times. Development beyond Trimley St Martin would facilitate journeys both to Ipswich and Felixstowe, because the traffic would not all be going in the same direction.
- 3. The loss of top grade agricultural land should be very carefully considered, and maybe more locally produced food provision should be encouraged.

In conclusion, further increases in the population of Felixstowe should be curbed, since the town will start to resemble other overcrowded places such as Watford, which is now virtually impossible to access, resulting in unnecessary stress. The pleasant aspect of towns like Felixstowe should be preserved, and should be given as much priority as the 'need' to provide developments which do not necessarily solve local needs.

I hope that you will take these points into consideration.

Summary:

There is no other rural lane on the peninsula not polluted by the noise and fall-out from the port. Gulpher Road is accessible to people of all mobilities to enjoy open fields, and escape the centres of population. This is very important with the density of building in the town and surroundings.

Any development on the peninsula would result in increasing traffic flow through the town, and would make work journeys more difficult. Development beyond Trimley St Martin would facilitate journeys both to Ipswich and Felixstowe, because the traffic would not all be going in the same direction.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot Specified

C - 7516 - 1657 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7516 Comment

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: A P Gittins [1657] Agent: N/A

Full Text: Surely the best route is either Church Road or Colneis Road into Ferry Road.

Summary: Surely the best route is either Church Road or Colneis Road into Ferry Road.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7519 - 4032 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7519 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: L J Vincent [4032] Agent: N/A

Full Text: The development behind Conway Close and Swallow Close is entirely unsuitable. Where are the site lorries going en

route? Our road (Glenagles Close) will be used as a short cut to the site along Upperfield Drive where it is NOT wide enough to pass any other vehicle, also several narrow bends. Also when the schools all open this estate many parents picking up and dropping off - where are the site lorries going then? Also what about the infrastructure involved? We are

all very concerned.

Summary: The development behind Conway Close and Swallow Close is entirely unsuitable. Where are the site lorries going en

route? Our road (Glenagles Close) will be used as a short cut to the site along Upperfield Drive where it is NOT wide enough to pass any other vehicle, also several narrow bends. Also when the schools all open this estate many parents picking up and dropping off - where are the site lorries going then? Also what about the infrastructure involved? We are

all very concerned.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7522 - 4034 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7522 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: A J Bultitude [4034] Agent: N/A

Full Text: The proposal to use Upperfield Drive, Felixstowe to service work being undertaken behind Conway Close & Swallow

Close

Upperfield Drive is not suitable for the traffic envisaged. It is too narrow and vehicles will not be able to pass. My wife has to attend Ipswich Hospital 3 times a week in an ambulance and involves an ambulance attending and parking up

my drive both to attend and return.

Summary: The proposal to use Upperfield Drive, Felixstowe to service work being undertaken behind Conway Close & Swallow

Close

Upperfield Drive is not suitable for the traffic envisaged. It is too narrow and vehicles will not be able to pass. My wife has to attend Ipswich Hospital 3 times a week in an ambulance and involves an ambulance attending and parking up

my drive both to attend and return.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7524 - 294 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7524 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mrs J Catchpole [294] Agent: N/A

Full Text: FPP5 Preferred Policy - Land North of Conway Close, Felixstowe

We strongly object to this proposal for 150 houses on the land north of Conway Close / Swallow Close.

3.45

It cannot be emphasised more that to put more traffic from this proposed development + the planned development on the other side of the road will cause chaos on Ferry Road. There is already a problem with traffic there - the road is narrow, some of the road is a lane. Farm lorry's + other commercial vehicles already have problems getting down the road. There is a school on the corner with Colnels Road which is in a dangerous position. There is a church + community hall traffic which causes more problems. Gulphur Road is named as a quiet road by SCC. This will no longer be so as it will be used a short cut. Also Upperfield Drive, another very narrow road will be used by traffic.

3.44

There is already a problem with sewerage in this area - there is no facility for extra housing.

3.43

This development is proposed in an area of outstanding beauty. There are footpaths on this land which are enjoyed by walkers, cyclists etc. The whole area is one of the few accessible parts of countryside which the town has to offer, which can be walked on. The rest is private land. At present the lanes can be enjoyed by walkers etc, but this will not be possible when there will be so much extra traffic. This land is also good farming land which is always used for crops and will be needed in the future.

It cannot be stressed more that there are no amenities in this area. The site is a long way from the town - shops, train station + employment. The bus stop is a 15min-20min walk away + only comes once an hour and never on a Sunday.

Summary:

We strongly object to this proposal for 150 houses on the land north of Conway Close / Swallow Close.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7528 - 4036 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7528 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr B Bullock [4036] Agent: N/A

Full Text: Very concerned that Heavy site lorries will be using Upperfield Drive for access. This will happen, especially when

parents drop off and pick up children in Ferry Road for Kingsfleet Primary School. Heavy site lorries will find their only access is Upperfield Drive. This road is too narrow and dangerous for this type of traffic. To prevent this taking place can double yellow lines be placed in part of Ferry Road, or a notice installed preventing this heavy site using this road.

Summary: Very concerned that Heavy site lorries will be using Upperfield Drive for access. This will happen, especially when

parents drop off and pick up children in Ferry Road for Kingsfleet Primary School. Heavy site lorries will find their only access is Upperfield Drive. This road is too narrow and dangerous for this type of traffic. To prevent this taking place can double yellow lines be placed in part of Ferry Road, or a notice installed preventing this heavy site using this road.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7530 - 3687 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7530 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: mrs julie dixon [3687] Agent: N/A

Full Text: I oppose to the building of residential housing behind Conway Close / Swallow Close as the increase in traffic including

heavy lorries during school drop off + pick up times will be disruptive to residents in Upperfield Drive.

Summary: I oppose to the building of residential housing behind Conway Close / Swallow Close as the increase in traffic including

heavy lorries during school drop off + pick up times will be disruptive to residents in Upperfield Drive.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7532 - 3702 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7532 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: mr gary dixon [3702] Agent: N/A

Full Text: I oppose to the building of residential houses behind Conway Close / Swallow Close as the increase in traffic will cause

a hazard and be disruptive to residents in Upperfield Drive, lorries and heavy vehicles are not suited to the roads they

will use

Summary: I oppose to the building of residential houses behind Conway Close / Swallow Close as the increase in traffic will cause

a hazard and be disruptive to residents in Upperfield Drive, lorries and heavy vehicles are not suited to the roads they

will use

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7534 - 4040 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7534 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr Ian White [4040] Agent: N/A

Full Text: I, like most other inhabitants of Felixstowe, would be far happier, if the town could be left exactly as it is. We feel

particular unhappiness at houses being built on Grade 1 agricultural land, particularly Gulpher Road, this land is

precious and irreplaceable.

We rejoice to see buildings, previously neglected, done up, and becoming something to be proud of. The Bartlett for

example, though we feel very sad at the loss to the town of a hospital, somewhere to go after an operation.

We would prefer the volume of traffic to stay much the same, also the density of population. Towns can become

unbearable over populated, too many squeezed in to a limited space.

We would be forced to consider moving, if things became unbearably frenetic.

Please don't build on Gulpher Road.

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example, though we feel very sad at the loss to the town of a hospital, somewhere to go after an operation.

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unbearable over populated, too many squeezed in to a limited space.

We would be forced to consider moving, if things became unbearably frenetic.

Please don't build on Gulpher Road.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7537 - 4042 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7537 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr Steve Burch [4042] Agent: N/A

Full Text: This site is on the edge of area of outstanding natural beauty. We are concerned about 700 extra vehicles, from both

sites putting pressure on Colneis Rd and Upperfield Drive at school time which is chaotic at present. Also that Gulpher Road which is a quiet lane being used as a rat race for the Walton Academy. We disagree the site being a central location as in the overall assessment. It is 1 1/2 miles to town centre 4 miles to dock and employment 3/4 mile to bus

stop with a hourly service.

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sites putting pressure on Colneis Rd and Upperfield Drive at school time which is chaotic at present. Also that Gulpher Road which is a quiet lane being used as a rat race for the Walton Academy. We disagree the site being a central location as in the overall assessment. It is 1 1/2 miles to town centre 4 miles to dock and employment 3/4 mile to bus

stop with a hourly service.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7546 - 1493 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7546 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mrs P Marsh [1493] Agent: N/A

Full Text: Ref Building on fields to north of Conway / Swallow Close

 $I\ strongly\ object\ to\ this\ suggestion.\ This\ is\ a\ pleasant\ open\ recreational\ area\ -\ and\ Ferry\ Road\ /\ Upper field\ Drive\ have$

many elderly residents who chose this quiet area for retirement.

My very grave concern is the Upperfield Drive will be used as a cut through as the area of Ferry Road / Colneis Road by the school is chaos now at school arrival and leaving times - also Colneis Road / Rosemary Avenue. I feel there are

going to be too many accidents.

Where will all these people work? Where will the children go to school? Another 1000 cars charging past doesn't bear

thinking about.

I don't suppose anyone on the planning committee lives in this area so will not care NIMBY.

If planning does pass this - will they guarantee Upperfield Drive will not be used as a rat run? And during building time lorries will be banned from Upperfield Drive it would be a hazard the road is not wide enough and many residents do not

move very quickly. I feel I had to write but don't suppose it will make any difference.

Summary: This is a pleasant open recreational area - and Ferry Road / Upperfield Drive have many elderly residents who chose

this quiet area for retirement.

My very grave concern is the Upperfield Drive will be used as a cut through as the area of Ferry Road / Colneis Road by the school is chaos now at school arrival and leaving times - also Colneis Road / Rosemary Avenue. I feel there are

going to be too many accidents.

Where will all these people work? Where will the children go to school? Another 1000 cars charging past doesn't bear

thinking about.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7550 - 2895 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7550 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: The Felixstowe Society (Mr Roger Baker) [2895] Agent: N/A

Full Text:

The Felixstowe Society repeats the comments of your letter dated February 2015. However, we wish to highlight our continuing concern about the effects on the local community of the proposals for Site 502e to the rear of Conway Close.

In our view there are two major drawbacks to the development of this site for housing.

The same as those for the site across Ferry Road previously considered. The first is a lack of a firm assessment of the impact of traffic from this site on surrounding roads. It is clear that to develop this site of up to 180 houses, together with the other site is going to produce more than 400 vehicle using the local roads, bearing in mind that there are several schools in the neighbourhood, and the roads do not lend themselves to this weight of traffic.

The other point of concern is the provision of services to this site. There is already evidence of flooding in parts of Ferry Rd where sewers cannot cope with heavy rainfall. Similarly the provision of water to these isolated sites is debatable. We note that up to three previous applications to develop the Ferry Rd sites were refused on appeal.

Development on this site would adversely affect this Area of Special Interest, adjacent to the AONB.

Summary:

There is a lack of a firm assessment of the impact of traffic from this site on surrounding roads. It is clear that to develop this site of up to 180 houses, together with the other site is going to produce more than 400 vehicle using the local roads, bearing in mind that there are several schools in the neighbourhood, and the roads do not lend themselves to this weight of traffic.

There is evidence of flooding in parts of Ferry Rd where sewers cannot cope with heavy rainfall. Similarly the provision of water to these isolated sites is debatable.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7554 - 4051 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7554 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

N/A Respondent: Mr & Mrs Goodall [4051] Agent:

Full Text: PROPOSED DEVELOPMENT OF FIELD NORTH OF CONWAY & SWALLOW CLOSES, FELIXSTOWE

> We would like to record our objections to the proposed development on the field north of Conway Close/Swallow Close, Felixstowe for the following reasons:

- 1. The site is totally unsuitable for the amount of traffic it would generate on to a narrow country lane. We use Ferry Road regularly and the passing of traffic is often difficult and under no circumstances should any further vehicular accesses be permitted.
- 2. The extra traffic that would be generated from this development would add greatly to the busy times at Kingsfleet School, particularly in Ferry Road and the top of Colneis Road. This already causes a nuisance in this area and would have a serious impact on road safety. The development would encourage numerous extra traffic movements as it would be used as a "short-cut" to Walton and the Felixstowe Academy, since most new homes would have an average of at least two cars per property. This end of Gulpher Road is totally unsuitable for additional car movements as it is used by horse riders, walkers, cyclists and slow moving agricultural machinery. It is very narrow, has high hedges and blind spots in several parts which would make it very dangerous.
- 3. Any proposed properties would have a serious affect on the existing sewage system.
- 4. Although I appreciate that more housing is required in Felixstowe, the type of houses that would be built will not be affordable to younger people and first time buyers who are the ones in need.
- 5. This field borders the AONB and should be kept for agricultural use and recreational amenity. This proposed development should be refused.

Summary:

Any proposed properties would have a serious affect on the existing sewage system. The extra traffic that would be generated from this development would have a serious impact on road safety.

Although I appreciate that more housing is required in Felixstowe, the type of houses that would be built will not be affordable to younger people and first time buyers who are the ones in need.

This field borders the AONB and should be kept for agricultural use and recreational amenity. This proposed

development should be refused.

Change to Plan

Appear at exam? Legal? Sound? **Duty to Cooperate? Soundness Tests** Not Specified Not Specified Not Specified Not Specified

O - 7555 - 3675 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7555 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: mr Peter White [3675] Agent: N/A

Full Text:

I am writing to give my concern to a possible application for a minimum 150 houses to the North of my property in Swallow Close, Felixstowe.

We know that outline planning permission has been given for 200 houses to the fields adjacent, in Ferry Road. The residents in Ferry Road have already given their concerns to the extra traffic and the lack of infrastructure to this area. Sewers being of particular concern.

This proposed further development would put a huge amount of extra stress to Ferry Road. The first application and all its associated comments showed how the locals felt about this first site. We do not know yet if Ferry Road can cope with the 200 houses, so to allow the development of another 150 plus houses would give even more concern.

School time at arrival and departure time already is an accident waiting to happen! It is chaos at these times. I fear that someone is going to get hurt! This will be worse when the 200 houses are occupied. What will it be like when the 150 plus houses are built and occupied I dread to think!

These two developments should they both go ahead, would not give the affordable housing associated with this type of site, the facilities that young people starting out would need. The location is just not suitable for young families. It is too far from the Town Centre.

Surely, the best option would be to see the possible effect that the first 200 houses has on Ferry Road, before any further permission should be granted for the next 150 or more houses.

Summary:

This proposed further development would put a huge amount of extra stress to Ferry Road. The first application and all its associated comments showed how the locals felt about this first site. We do not know yet if Ferry Road can cope with the 200 houses, so to allow the development of another 150 plus houses would give even more concern.

School time at arrival and departure time already is an accident waiting to happen! It is chaos at these times. I fear that someone is going to get hurt!

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7556 - 4052 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7556 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mrs Monica Smith [4052] Agent: N/A

Full Text: I would like to place on record my objections to the proposed inclusion in the Area Action Plan of the field to the north of

Conway Close. Outline consent has already been given for 200 homes on the other side of Ferry Road. This is already too large a development for the existing road network to service. The sewage system in this area is under severe stress.

Every time there is heavy rain, gardens in Ferry Road are flooded.

The suggestion that this site is close to the town centre and other amenities is just plain wrong! There are no employment opportunities at this end of town and furthermore no serious shopping can be undertaken without a car. 150 new homes on this field disgorging their cars on to Ferry Road would seriously exacerbate an already difficult

situation.

The statement that development here would not have an adverse effect on the A.O.N.B. is also open to dispute.

Building more houses on an already overcrowded peninsula with only one substantial employer, whose activity is

becoming increasingly mechanised is storing up major problems for the future.

Summary: I would like to place on record my objections to the proposed inclusion in the Area Action Plan of the field to the north of

Conway Close. Outline consent has already been given for 200 homes on the other side of Ferry Road. This is already too large a development for the existing road network to service. The sewage system in this area is under severe stress.

Every time there is heavy rain, gardens in Ferry Road are flooded.

150 new homes on this field disgorging their cars on to Ferry Road would seriously exacerbate an already difficult

situation.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7557 - 4053 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7557 Comment

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Neville & Doris Jarvis [4053] Agent: N/A

Full Text: Re Planning for minimum of 200 additional homes off Ferry road /Gulpher Road Felixstowe

Last year SCDC planning committee granted outline planning permission for up to 200 homes on the fields off Ferry Road. This was inspite of Felixstowe Town Councils & most of the local residents objection to the proposals. Nevertheless we the local residents have to accept the democratic decision but we need to voice our concerns about the types of dwellings to be built & the high density that 200 houses on this site would create.

I wish to register my views on the type of housing which should be erected on this site to meet the needs of the Community in Felixstowe. Yes there should be some provision for affordable housing but there should also be some provision for the older generation.

I am generally against 2.5/3 story type housing on this particular site as it is out of keeping with the area & the existing houses around the site.

Several local Councils (including Gt. Yarmouth recently) are beginning to recognise that there is an acute shortage of Bungalows being built to meet the demands of an ageing population who wish to downsize from large family homes. I know that there has been no substantial building of bungalows in Felixstowe for a number of years. My wife & I have been seeking for at least the past 3 years to downsize to purchase 2 or 3 bedroom bungalow without success because of the very limited supply & high demand.

The problem of limited supply of bungalows to allow elderly people to downsize has undoubtedly created a 'bottleneck' in the housing market in Felixstowe. Most of these elderly people are tending to stay put rather than release their bigger family homes so that younger families can purchase, in tum releasing smaller homes down the housing chain for first time buyers.

We all know that Developers/Builders wish to maximise profit by building 3 story high density houses. However building some bungalows on the site could equally maximise builders profits. Bungalows would no doubt be overpriced but because of the heavy demand for such properties in Felixstowe I am confident that if 20/30 bungalows were erected on this site they would all be sold off plan within a couple of weeks!! The builders would have their holding deposit & quaranteed sales.

I understand that the Felixstowe Area Action Plan is to enable all parties particularly local residents who live around the proposed development to have their say on the types of housing to be built. I propose the building of 20/30 bungalows on this site preferably on the land abutting existing dwellings in Estuary Drive/Bawdsey Close. Please consider this submission under the preferred options consultation.

Summary:

Re Planning for minimum of 200 additional homes off Ferry road /Gulpher Road Felixstowe

Last year SCDC planning committee granted outline planning permission for up to 200 homes on the fields off Ferry Road. I understand that the Felixstowe Area Action Plan is to enable all parties particularly local residents who live around the proposed development to have their say on the types of housing to be built. I propose the building of 20/30 bungalows on this site preferably on the land abutting existing dwellings in Estuary Drive/Bawdsey Close. Please consider this submission under the preferred options consultation.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7577 - 1674 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7577 Object

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr & Mrs B Buck [1674] Agent: N/A

Full Text: We would like to register our strong objection to the proposed development of the field north of Conway Close/Swallow

Close.

With the proposal for 150 houses on this site, together with 200 already approved in March 2014 on the opposite field, it would mean a likelihood of up to 1,000 new car movements daily onto Ferry Road, causing more traffic chaos in the area. Ferry Road is a narrow country lane and together with the even narrower Gulpher Road (designated a quiet lane) could possibly become a "rat run" for commuters to access the Al4 via Trimley High Road.

A further worry is that the proposed site would suffer from an exhausted sewerage system, causing problems for existing households unless a new pumping station is provided. (We understand a similar situation prevails on the Ferry Road site).

This green field site has been used for essential food production for many years, which we should surely be promoting to help with food security and reduction of air miles. It also borders an ANOB with views of the Deben estuary and as such does not accord with the Councils stated policy of restricting such development. Its footpaths are regularly used by walkers, cyclists and horse riders and would be threatened by development.

Has an assessment been made of any disturbance that would affect the local bat colony?

The site is distant from the town centre and the main employment area, and as such, does not accord with the Councils stated policy to encourage walking and cycling from its new housing developments. An hourly bus service is about 10 minutes walk away, and there are no buses on Sundays or evenings.

Summary: With the proposal for 150 houses on this site, together with 200 already approved on the opposite field, it would mean a

likelihood of up to 1,000 new car movements daily onto Ferry Road, causing traffic chaos in the area. Ferry Road is a narrow country lane and together with the even narrower Gulpher Road (designated a quiet lane) could become a "rat run" for commuters to access the A14 via Trimley High Road. This green field site has been used for essential food

production for many years, which we should be promoting to help with food security.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7585 - 3839 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7585 Comment

Housing Preferred Policy FPP5: Land north of Conway Close,

Felixstowe

Respondent: Mr Steve McCullough [3839] Agent: N/A

Full Text:

I read with interest that some proposed developments within the peninsular area action plan, have the following paragraph attached. These are:-

- * SHLAA Ref 1011c, Sunday Market Site,
- * SHIAA Ref 451g, Land north of High St Walton,
- * SHLAA Ref 502e, Land north of Conway Close and
- * SHLAA Ref 383f and 451f, Land south Of Thurmans Lane, Trimley St Mary

"Anglian Water have identified that there is limited capacity in the foul sewerage network and the connections to this network may need tobe reinforced as a result of additional dwellings in this area. The capacity of the foul sewerage network is a constraint that needs to be overcome to the satisfaction of Anglian Water"

The routing of the Anglian Water outfall crosses a significant part of the Port Of Felixstowe's infrastructure. There has been an issue I have known about for the last five years, whereby at every high tide, a significant amount of treated water emerges from two drain covers in close proximity to the Main Office of Tomline House.

Anglian Water has advised the Port, it is due to their pump not being able to overcome the pressure of the tide against the outfall. The pump is required to run 24/7 to try and meet current demand and housing level.

To accommodate any new development, this situation surely must be remedied. If Anglian Water needs to upgrade their pipework capacity, they will have to excavate in some of the most recently developed areas of the Port and at considerable disruption to its Operations. Some of the network crosses a currently undeveloped site but it is only matter of time before the Port will want to incorporate this as part of its expansion programme.

Is Anglian Water prepared to undertake and pay for this multi million pound project?

Surely Suffolk Coastal District Council will want to see that Anglian Water have improved the infrastructure first, before considering any potential housing requirements?

Summary:

To accommodate any new development, this situation surely must be remedied. If Anglian Water needs to upgrade their pipework capacity, they will have to excavate in some of the most recently developed areas of the Port and at considerable disruption to its Operations. Some of the network crosses a currently undeveloped site but it is only matter of time before the Port will want to

incorporate this as part of its expansion programme.

Is Anglian Water prepared to undertake and pay for this multi million pound project?

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7617 - 2581 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7617 Comment

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text:

Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

- * FPP4 Walton Field evaluation has identified an Early-Middle Bronze Age funerary landscape across the site, with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.
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Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7617 - 2581 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7617 Comment

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

Early Education

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The Government has indicated that it will legislate to double the number of hours' free childcare to 30. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

- In the Trimleys, developer contributions have already been secured to help manage the existing deficit in Early Years places and proposals are being drawn up to deliver additional places. Further development of the scale proposed (530 dwellings) will necessitate significant additional provision. Under current statutory arrangements, this would necessitate 53 additional places. When Land North of Walton High Street (400 dwellings) is included, the number of places required under current arrangements would increase to 93.

The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

- Development in the remainder of Felixstowe (150 dwellings North of Conway Close and 40 dwellings at Sea Road) can be managed by expanding existing settings.
- At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

The County Council would appreciate consideration of ways in which this policy could be more supportive of early education in retail centres, as part of a balanced policy which also protects the vitality and viability of retail centres. Policy FPP17 appears to implicitly support early education already, and discussion with the District Council may conclude that this policy is sufficient.

Primary Education

The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7617 - 2581 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7617 Comment

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

[see table in attached document]

Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

Grange Primary School can also expand, though this school is also not well related to the proposed allocations or future directions of growth.

Paragraphs 37 and 38 of the National Planning Policy Framework reflect the need to minimise the length of journeys to school and, for major developments, primary schools should be located within walking distance of most properties.

The best long term solution would be to reserve 2.2ha land for a new 315-place primary school and early years setting in a location which is well related to housing growth. This would also enable provision to be made for future growth, with another school capable of expansion.

Options for reserving land for a new primary school include:

- Land within 'Land North of Walton High Street'
- Land within another one of the Trimley sites
- Land in another location in the Trimleys, well related to sustainable travel routes and the new housing.

Secondary and Sixth Form Education

Based on standard pupil multipliers, development of 1,135 dwellings would be expected to generate an additional 204 secondary school pupils and an additional 45 sixth formers.

Felixstowe and the Trimleys are served by Felixstowe Academy. Based on the forecast below, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from the development proposed in this Plan.

[see table in attached document]

All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

Health, Wellbeing and Social Care

A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

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The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

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7617 Comment

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

- * Ferry Road opposite site 502E
- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-

C - 7617 - 2581 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7617 Comment

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

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Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Kirton Sites SW.pdf
Felixstowe Sites SW.pdf
2015-11-23 Felixstowe AAP_SCC Final Response.pdf
Felixstowe Sites FZ.pdf
Kirton Sites FZ.pdf

C - 7681 - 2581 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7681 Comment

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text:

Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

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Suggested Amendments

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C - 7681 - 2581 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7681 Comment

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

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The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

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C - 7681 - 2581 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7681 Comment

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

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[see map in attached document]

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C - 7681 - 2581 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7681 Comment

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Floods-Planning-protocol-Version-12.pdf

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[see attached document fo appendix]

Summary:

FPP5 Transport Access and Traffic Issues. 1503 units. Access may be acceptable subject to traffic impact on Ferry Road and Gulpher road. Previous application included traffic survey and Transport Assessment. Transport Assessment should consider relationship with transport issues at Kingsfleet School. Other detailed comments provided under headings sustainability (public rights of way), collision history. Further detailed information provided on potential mitigation schemes.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Kirton Sites SW.pdf
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Kirton Sites FZ.pdf
Felixstowe Sites FZ.pdf

C - 7687 - 2581 - Preferred Policy FPP5: Land north of Conway Close, Felixstowe - None

7687 Comment

Housing

Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text:

Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

- * FPP4 Walton Field evaluation has identified an Early-Middle Bronze Age funerary landscape across the site, with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.
- * FPP6 Trimley Cropmarks on this site show that there are complex archaeological remains of pits, ditches and a coaxial field system and trackways of possible late prehistoric date (TYN 122). Archaeological remains are therefore known on the site, although they have not been fully characterised.

Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

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The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

Early Education

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The Government has indicated that it will legislate to double the number of hours' free childcare to 30. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

- In the Trimleys, developer contributions have already been secured to help manage the existing deficit in Early Years places and proposals are being drawn up to deliver additional places. Further development of the scale proposed (530 dwellings) will necessitate significant additional provision. Under current statutory arrangements, this would necessitate 53 additional places. When Land North of Walton High Street (400 dwellings) is included, the number of places required under current arrangements would increase to 93.

The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

- Development in the remainder of Felixstowe (150 dwellings North of Conway Close and 40 dwellings at Sea Road) can be managed by expanding existing settings.
- At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

The County Council would appreciate consideration of ways in which this policy could be more supportive of early education in retail centres, as part of a balanced policy which also protects the vitality and viability of retail centres. Policy FPP17 appears to implicitly support early education already, and discussion with the District Council may conclude that this policy is sufficient.

Primary Education

The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

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[see table in attached document]

Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

Grange Primary School can also expand, though this school is also not well related to the proposed allocations or future directions of growth.

Paragraphs 37 and 38 of the National Planning Policy Framework reflect the need to minimise the length of journeys to school and, for major developments, primary schools should be located within walking distance of most properties.

The best long term solution would be to reserve 2.2ha land for a new 315-place primary school and early years setting in a location which is well related to housing growth. This would also enable provision to be made for future growth, with another school capable of expansion.

Options for reserving land for a new primary school include:

- Land within 'Land North of Walton High Street'
- Land within another one of the Trimley sites
- Land in another location in the Trimleys, well related to sustainable travel routes and the new housing.

Secondary and Sixth Form Education

Based on standard pupil multipliers, development of 1,135 dwellings would be expected to generate an additional 204 secondary school pupils and an additional 45 sixth formers.

Felixstowe and the Trimleys are served by Felixstowe Academy. Based on the forecast below, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from the development proposed in this Plan.

[see table in attached document]

All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

Health, Wellbeing and Social Care

A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

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minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

- * Ferry Road opposite site 502E
- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-

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Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

FPP5 Surface Water Management. Local Members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

2015-11-23 Felixstowe AAP_SCC Final Response.pdf Felixstowe Sites SW.pdf Kirton Sites SW.pdf Felixstowe Sites FZ.pdf Kirton Sites FZ.pdf

O - 6560 - 3687 - Sustainability Appraisal Information - None

6560 Object

Housing Sustainability Appraisal Information

Respondent: mrs julie dixon [3687] Agent: N/A

Full Text: I object to the extra traffic through Upperfield Drive as people taking short cuts. An area mainly homes to elderly retired

people who wish for peace and quiet, not to be surrounded by 350 new homes on their doorstep.

This is an area of natural countryside and should be left as such, building here will have a detrimental effect on this area.

Far too much traffic will be leaving and entering into Ferry Road which is just a country road.

Summary: I object to the extra traffic through Upperfield Drive as people taking short cuts. An area mainly homes to elderly retired

people who wish for peace and quiet, not to be surrounded by 350 new homes on their doorstep.

This is an area of natural countryside and should be left as such, building here will have a detrimental effect on this area.

Far too much traffic will be leaving and entering into Ferry Road which is just a country road.

Change to Plan If these houses must be built - somewhere away from the green belt of Felixstowe in a more thriving area.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6959 - 3866 - 3.48 - None

6959 Object

Housing 3.48

Respondent: Mr Steven Hayward [3866] Agent: N/A

Full Text: Despite being related to existing facilities the current road structures aren't suitable for an increased volume of traffic

which will be a result of more housing. When there is large functions at the sports centre there is not enough space for parking and sometimes the road has become so narrow it would be impossible for the emergency services to safely and quickly get through. Despite the good intention of a village green outside I believe this does not substitute the current view I have which was one of the selling points when I bought the house. In addition there maybe an increase in noise at unsociable hours due to it being a gathering point for teenagers and children who may live on the estate, this may cause safety issues because the nature of the high road. There will be an increase in litter because there will be more

people.

Summary: -increased traffic

-reduced access for emergency services

-increased antisocial noise -safety for children with busy road

-increase in litter

suitable

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6961 - 3866 - 3.49 - None

6961 Object

Housing 3.49

Respondent: Mr Steven Hayward [3866] Agent: N/A

Full Text: The building of houses on this site would decrease these green spaces, footpaths and dog walking areas which already

exist.

Summary: The building of houses on this site would decrease these green spaces, footpaths and dog walking areas which already

exist.

Change to Plan Another site would be more suitable having less environment effect.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6964 - 3866 - 3.50 - None

6964 Object

Housing 3.50

N/A Respondent: Mr Steven Hayward [3866] Agent:

Full Text: The current road infrastructure struggles to cope with local traffic. There is not enough parking at the proposed site for

the existing properties and more cars would make this even more of a problem. The narrowing of the road between the Methodist church and the white grade 2 listed cottages causes a bottleneck which can be dangerous especially as there is often larger vehicles such as regular busses and large farm machinery on the road. More cars and pedestrians would

make this problem worse and very dangerous.

The current road infrastructure struggles to cope with local traffic. There is not enough parking at the proposed site for Summary:

the existing properties and more cars would make this even more of a problem. The narrowing of the road between the Methodist church and the white grade 2 listed cottages causes a bottleneck which can be dangerous especially as there is often larger vehicles such as regular busses and large farm machinery on the road. More cars and pedestrians would

Soundness Tests

make this problem worse and very dangerous.

Change to Plan Another more suitable site would be better. Somewhere with better access which would have less impact on an already

Duty to Cooperate?

struggling road infrastructure

Legal?

Sound? Not Specified Not Specified Not Specified Not Specified None

Attachments:

Appear at exam?

O - 6967 - 3866 - 3.51 - None

6967 Object

Housing 3.51

Respondent: Mr Steven Hayward [3866] Agent: N/A

Full Text: Any development will have an effect on the village, it will inappropriately increase its size resulting in loosing the identity

of the village. I have noticed that the current plans will have minimal impact on at least three members of the Parish council living in this area. The proposed plans stop at 21 Grimston Lane which is the address of Stephen Bozier who is a member of the council. This leads me to believe that as these properties have been protected it is apparent that the

Parish council have recognised the negative impact this development would have on this area.

Summary: Any development will have an effect on the village, it will inappropriately increase its size resulting in loosing the identity

of the village. I have noticed that the current plans will have minimal impact on at least three members of the Parish council living in this area. The proposed plans stop at 21 Grimston Lane which is the address of Stephen Bozier who is a member of the council. This leads me to believe that as these properties have been protected it is apparent that the

Parish council have recognised the negative impact this development would have on this area.

Change to Plan A more suitable site can be found which would have less impact on the village and its identity as a village.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6969 - 3866 - 3.53 - None

6969 Object

Housing 3.53

Respondent: Mr Steven Hayward [3866] Agent: N/A

Full Text: The current schools are full therefore any children that move to this area would have a negative effect on local eduction

due to increased class sizes and stretched resources resulting in a negative impact on each child.

Summary: The current schools are full therefore any children that move to this area would have a negative effect on local eduction

due to increased class sizes and stretched resources resulting in a negative impact on each child.

Change to Plan Another site would be more suitable which would not have a negative affect on the small village schools.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6970 - 3866 - 3.54 - None

6970 Object

Housing 3.54

Respondent: Mr Steven Hayward [3866] Agent: N/A

Full Text: Any development on this site will undoubtedly have a lasting negative affect on local wildlife.

Summary: Any development on this site will undoubtedly have a lasting negative affect on local wildlife.

Change to Plan Another site would be more suitable to sustaining local ecosystems. A brown field site would be more suitable

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6588 - 3620 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

N/A

6588 Comment

Housing

Full Text:

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

Respondent: Trimley St Martin Parish Council (Mr Gordon

Mussett) [3620]

[See attached document for full comments]

Trimley St Martin have considered the two sites within their Parish, and our comments are shown below:-

Policy FPP6 - Land opposite the Hand in Hand Public House, High Road - residential development Whilst in principle the Council would prefer to see this site undeveloped, if development is to occur the Council would like the following changes and additions to policy FPP6:-

Agent:

Applicants should have regard to the following:-SCDC Policy Wording TSM Proposed Wording

Primary vehicular access onto High Road The ONLY vehicular access is to be onto High Road

- b) Village green to be created fronting onto High Road to reduce impact on the setting of the Hand in Hand Public House Village green to be created fronting onto High Road to reduce impact on the setting of the Hand in Hand Public House
- Existing Public Right of Way to be retained and integrated into the site layout Existing Public Right of Way to be c) retained and integrated into the site layout
- 70 dwellings expected on the site as a minimum with affordable housing provision to be in line with Core Strategy Policy DM2 70 dwellings expected on the site AS A MAXIMUM with affordable housing provision to be in line with Core Strategy Policy DM2
- Future residential properties should not extend beyond the residential curtilage of 21 Grimston Lane FUTURE DEVELOPMENT (RESIDENTIAL OR COMMERCIAL) should not extend beyond the residential curtilage of 21 Grimston Lane
- A range of housing types and tenures in keeping with the surrounding area and in line with Core Strategy Table 3.6 A range of housing types and tenures in keeping with the surrounding area and in line with Core Strategy Table 3.6. The range to be determined by a Local Housing Needs Survey conducted by an independent organization and paid for by the developer.
- Maximum build height of 2 storeys Maximum build height of 2 storeys
- High percentage of bungalow/low rise units to reflect character of the surrounding area High percentage of bungalow/low rise units to reflect character of the surrounding area
- Air Quality assessment required Air Quality assessment required

Road widening of High Road to provide layby parking on its south side (the north boundary of this development Junction control (mini-roundabout or traffic lights) for access road opposite Mill Lane

Pedestrian crossing in High Road to enable residents from new development to access services

Policy FPP7 - Land off Howlett Way - residential development

Whilst in principle the Council would prefer to see this site undeveloped, if development is to occur the Council would like the following changes and additions to policy FPP7:-

Applicants should have regard to the following:-

- SCDC Policy Wording TMS Proposed Wording
 a) Primary vehicular access onto Howlett Way The ONLY vehicular access to be onto Howlett Way
- b) No vehicular access onto Church Lane No vehicular access onto Church Lane
- Links to existing Public Rights of Way Network Links to existing Public Rights of Way Network c)
- 360 dwellings expected on the site as a minimum with affordable housing provision to be in line with Core d) Strategy Policy DM2 360 dwellings expected on the site AS A MAXIMUM with affordable housing provision to be in line with Core Strategy Policy DM2
- A range of housing types and tenures in keeping with the surrounding area and in line with Core Strategy Table 3.6 A range of housing types and tenures in keeping with the surrounding area and in line with Core Strategy Table 3.6.
- The range to be determined by a Local Housing Needs Survey conducted by an independent organization and paid for by the developer.
- Development to be sympathetic to the setting of the Old Rectory Development to be sympathetic to the setting of the Old Rectory
- Site design and layout to take into account the water mains crossing the site Site design and layout to take into account the water mains crossing the site
- On-site open space and play facilities to meet needs identified in the SCDC Leisure Strategy On-site open space and play facilities to meet needs identified in the SCDC Leisure Strategy
- Air Quality Assessment needed Air Quality Assessment needed

Maximum build height of 2 storeys

Policy FPP6 - Land opposite the Hand in Hand Public House, High Road - residential development Summary:

Whilst in principle the Council would prefer to see this site undeveloped, if development is to occur the Parish Council have identified a number of changes and alterations to the requirements included within FPP6.

Change to Plan

Legal? Sound? **Duty to Cooperate?** Soundness Tests Appear at exam?

Not Specified Not Specified Not Specified Not Specified None

C - 6588 - 3620 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

6588 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

Attachments:

Trimley St Martin Comments.pdf

C - 6618 - 3734 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

6618 Comment

Housing Preferred Policy FPP6: Land opposite Hand in Hand

Public House, Trimley St Martin

Respondent: Mr K and Mrs E D'arville [3734] Agent: N/A

Full Text: RE: HAVE YOUR SAY - HOUSING DEVELOPMENTS ON:-

Land off Howlett Way, Trimley St Martin

Land opposite the Hand in Hand pub, Trimley St Martin

Land off Thurmont Lane, Trimley St Mary

I understand the need for further development for housing but my concerns are:-

- 1. The livelihood of the farmer/s. Are they happy to give up these areas they have been working and earning a living from for the past x number of years?
- 2. Exactly how many 'affordable homes' ie one and two-bed dwellings will be allocated for current homeowners to purchase who wish to upsize or downsize?

I say this because, on making enquiries on purchasing a two-bed property on the Mushroom Farm complex, I was informed they were all going to the Housing Association, which I consider rather unfair to current homeowners who want to move

- 3. I understand land opposite the Hand in Hand is due to undergo development. Will there be any chance of a decent number of 2-bed dwellings being offered on the open market or will the same policy apply as the Mushroom Farm policy?
- 4. If and when it does come to the planning of the above developments can care be taken on:-
- a) The planting of trees ie avoiding species such as Sycamore which are an absolute nightmare for those who have to clear up after them, not only in the Autumn but Spring as well. It's not just their leaves to clear up but also their constant seedlings, which can take root, if allowed, and not a good idea if right next to your house.
- b) Storm drains. Can the planners avoid installing storm drains, which are subsequently written in the deeds of the homeowners as their responsibility, as a group, to share the maintenance and costs, and not the council. Yes I speak from experience.
- c) Kerb side general areas all nicely planted up but again subsequently written into the deeds of homeowners to share costs/responsibility of maintaining.

 In real life this does not work.

Your comments/feed back on the above would be much appreciated.

Summary:

On making enquiries on purchasing a two-bed property on the Mushroom Farm complex, I was informed they were all going to the Housing Association, which I consider rather unfair to current homeowners who want to move. I understand land opposite the Hand in Hand is due to undergo development. Will there be any chance of a decent number of 2-bed dwellings being offered on the open market or will the same policy apply as the Mushroom Farm policy?

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Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6634 - 2963 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

6634 Comment

Housing Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

Respondent: Suffolk Coastal District Council (SCDC Agent: N/A

Environmental Protection) [2963]

Full Text: I would like to comment, with regard to air quality, on the above Preferred Options Consultation as follows:

1) Felixstowe Peninsula Area Action Plan

* Land North of High Street, Walton - SHLAA Ref 451g Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* Land rear of Conway Close, Felixstowe - SHLAA Ref 502e Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

- * Land opposite Hand in Hand Public House, Trimley St. Martin SHLAA Ref 451b Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.
- * Land off Howlett Way, Trimely St. Martin SHLAA Ref 451d and 451c Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with both of these sites.
- * Land South of Thurmans Lane, Trimley St. Mary SHLAA Ref 383f and 451f Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with both of these sites.

* Employment

Land at Haven Exchange

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

- 2) Site Allocations & Area Specific Policies Development Plan Document
- * SSP10 Garden Square, Rendlesham

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* SSP11 - 3-33 Suffolk Drive, Rendlesham

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* SSP22 - Bentwaters Park, Rendlesham

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* SSP 31 - Snape Maltings

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

Other comments

With regard to the Neighbourhood Plans for Woodbridge, Kesgrave and Leiston (and any others in the pipeline), we have particular concerns about developments with the potential to impact upon the volume and/or types of vehicular traffic at the Woodbridge Air Quality Management Area.

C - 6634 - 2963 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

6634 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

It is sometimes difficult to convey to developers the importance of AQ impacts in respect of developments which may be, (by their own judgement) a significant distance from the Woodbridge AQMA; however, efforts to find ways of reducing the elevated levels of transport-related pollutants at this location to below the levels required by the EU Air Quality Directive (and UK regulations) have consistently failed to produce the required improvements in the 10 years or so since this AQMA was declared. This failure could result in financial penalties to the UK government from the EU. We are assured that any such penalties will be passed on to LAs with "failing" AQMAs in their districts. Consequently, we need to leave no stone un-turned in our examination of any proposed larger scale development (whether housing or otherwise) which has the potential to increase vehicle traffic at the existing Woodbridge Junction AQMA is consequently a matter of serious concern. Any such scheme must be accompanied by technical and robust modelling to predict the impact on traffic at this AQMA, accompanied by and assessment of the possible methods of mitigating those impacts.

The same general comments apply to some areas where our modelling/sampling indicates AQ thresholds are under pressure (but not yet breached) from transport-related sources.

Summary:

* Land opposite Hand in Hand Public House, Trimley St. Martin - SHLAA Ref 451b Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this

Change to Plan

Appear at exam? Not Specified

Legal? Not Specified Sound? Not Specified **Duty to Cooperate?** Not Specified

Soundness Tests

O - 6652 - 3234 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

6652 Object

Housing Preferred Policy FPP6: Land opposite Hand in Hand

Public House, Trimley St Martin

Respondent: Mrs Julie Cornforth [3234] Agent: N/A

Full Text: Build on brownfield sites first.

Summary: Build on brownfield sites first.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6945 - 3856 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

6945 Object

Housing Preferred Policy FPP6: Land opposite Hand in Hand

Public House, Trimley St Martin

Respondent: mrs elaine scott [3856] Agent: N/A

Full Text: Too many houses for one village.

No infrastucture considered.

Not building for local people as population for Felixstowe has decreased.

All developments will increase traffic down the High Road. Traffic speeds down this road and takes no notice of 30mph limit. We have made representation to council re parking of cars on the High Road outside the Hand in Hand pub as on High hall Close we are unable to see clearly traffic coming from the right. Advised by Council not an issue as car

spaces needed to be provided for cottages on the High Road. Where are they going to park now?

Summary: Too many houses.

No infrastructure

Not building for local people

Traffic issues

Change to Plan Houses to be spread more round the Peninsula , not in one area .

Double yellow lines down High hall Close and outside Hand in Hand . Some form of taffic calming measures needed on

High Road.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6972 - 3866 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

6972 Object

Housing Preferred Policy FPP6: Land opposite Hand in Hand

Public House, Trimley St Martin

N/A Respondent: Mr Steven Hayward [3866] Agent:

Full Text: In addition to previously stated objections there is other factors that will have a negative impact on the area. Current

sewers struggle to cope from personal experience I have had to call Anglian water on multiple occasions due to backed

up drains. I also have problems with water pressure coming from the main supply.

There is also the increased traffic, disturbance and noise levels created by the building of the houses. Also there may

be errors in the building causing a loss of services to the current properties.

If there is an accident on the A14 then the Trimley High Road becomes the only route through for all the main road traffic including residential and HGVs going to and from the Port. Many of these points must have been identified as having a negative affect by the Parish Council due to the planned developments stop before reaching their own

properties.

-Sewers currently struggle to cope. Summary:

-Problems with water pressure

-Increases in traffic, noises and disturbances during the building and once the houses are occupied.

-loss or services to current residents -increased dangers when the A14 is shut -Parish council have identified negatives

A more suitable site must be found which has less impact on the existing residents, services and amenities. Change to Plan

Appear at exam? Legal? Sound? **Duty to Cooperate? Soundness Tests** None

Not Specified Not Specified Not Specified Not Specified

C - 7104 - 3314 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7104 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

Respondent: Lorna Adamson [3314] Agent: N/A

Full Text:

Comments on the Felixstowe Peninsula Action Plan

FPAP 3.07 I welcome the aim to preserve as far as possible prime agricultural land for food production.
FPAP 3.20 I welcome the statement that proposals for new residential development outside the physical limits boundaries will be strictly controlled in accordance with national planning policy and the strategy for the countryside as set out in Core Strategy policy SP29.

I welcome the statement that extending the boundaries further was considered inappropriate because this may lead to further development in locations which are not well related to the existing settlements, services and facilities and lead to new building encroaching into the countryside.

FPAP 3.26 to 3.38 Land north of Walton High Street I am concerned at the loss of prime grade 1 and 2 agricultural land with the proposals for this site when 3.07 states the aim to preserve to preserve prime agricultural land for food production. I am not clear what 'mitigation may offset the loss of greenfield land of Grade 1-2 Agricultural soil classification'. I am also concerned about the potential for very heavy traffic on the High Road opposite Felixstowe Academy. The High Road is the main route into Walton and Felixstowe used by many residents living in the Trimleys in order to avoid the Howlett Way sliproad onto the A14 with heavy lorries to the docks bearing down on local vehicles. There should be a transport assessment carried out on the implications for the High Road - particularly at peak times of the day.

FPAP 3.50 Site opposite the Hand in Hand pub in Trimley St Martin I would endorse the need for a transport assessment here too as 'access to this site must be onto High Road as this provides the most suitable access point for the development and would also require a transport assessment to be undertaken as part of any future application. In addition, there is 'the major negative environmental effect is due to loss of Grade 2 agricultural soils.' I should be interested to know what 'Scope exists to mitigate for this effect.'

FPAP Site 451c and 451d With my concerns about the implications of development for traffic congestion and danger for users on the High Road, I am very worried about the proposal for a minimum of 350 houses on this site. The SSAASP mentions only a transport assessment for Howlett Way. There is also the major negative environmental effect from the loss of Grade 2 agricultural soils and again I am unconvinced by the statement 'scope exists to mitigate for this effect'. There should at least by a transport assessment carried out on the implications for the High Road - particularly at peak times of the day.

The Old Poultry Farm - which the site 451c wraps around - is brownfield land and an eyesore. I cannot see anyone particularly wishing to live in houses which are built beside this derelict site.

FPAP Appendix 3

I welcome the decision to discount the sites in Trimley St Martin set out in this Appendix. However, I am very disappointed that sites 920, 928 and 726 have been left for consideration in 'The local plan review' when they so clearly in my view violate national planning policy and the strategy for the countryside as set out in Core Strategy policy SP29.

Summary:

I would endorse the need for a transport assessment here too as 'access to this site must be onto High Road as this provides the most suitable access point for the development and would also require a transport assessment to be undertaken as part of any future application. In addition, there is 'the major negative environmental effect is due to loss of Grade 2 agricultural soils.' I should be interested to know what 'Scope exists to mitigate for this effect.'

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7118 - 3898 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7118 Object

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House. Trimley St Martin

Respondent: Sharon lannuzzi [3898] Agent: N/A

Full Text:

I am writing in response to the invitation for local people to give their opinions on the proposed plans for the peninsular.

70 houses on land opposite the Hand in Hand - not in favour

The Hand in Hand is a Grade 2 listed building as is the cottage adjacent to the right hand side of the field. Possibly there are other properties in that area that are also listed. There are already 60 house being built on the Mushroom Farm site so to add an additional number of houses on that scale would create an estate. The Mushroom Farm site will create additional traffic however the roundabout will aid this. To create another entrance further up will create extra traffic and the additional houses would spoil the village feel to the area and spoil the view for houses in that area. The Trimley Sports and Social Club is an excellent social venue for our area. The committee have worked hard on limiting outdoor noise. I would be saddened if new residents complained about noise levels and this venue was forced not to stage events for the local community.

300 houses Howlett Way - Not in favour

As one of the organisers of Trimley carnival, I would not be in favour of that number of houses being located there. Howlett Way is a 'pinch point' when the procession passes. 300 houses would create an awful lot of traffic during rush hours and affect school traffic on the High Road. Our 2 Trimley Schools are running almost at capacity for pupil numbers. Where would these families be schooled? Could The Academy cope with extra numbers? If our Trimley Schools needed expanding, where would the revenue come from? School budgets are currently stretched.

100 houses off Thurmans lane/Thomas Avenue - In favour

Providing the access to these houses is via Faulkeners Way, from Thomas Avenue/The Josselyns, this proposal does make sense. The houses would be built onto an existing estate on land adjacent to the A14. The number of houses may need to be reviewed to ensure they do not impact on houses in Thurmans Lane/Church Lane.

Sunday Market Site - in favour

Unfortunately the Sunday market has fallen into decline in recent years and the current number of stalls can be easily managed on the Mannings site. Therefore it makes sense to build on this piece of land to improve the visual impact of this piece of land and tie in with the nearby regeneration of Martello Park.

With regard the proposal for houses in Walton near the Academy, I feel I would need more information before making a decision.

I look forward to hearing about future developments with these proposals.

Summary:

The Hand in Hand is a Grade 2 listed building as is the cottage adjacent to the right hand side of the field. There are already 60 house being built on the Mushroom Farm site, to add an additional number of houses on that scale would create an estate. The Mushroom Farm site will create additional traffic however the roundabout will aid this. To create another entrance further up will create extra traffic and the additional houses would spoil the village feel to the area. The Trimley Sports and Social Club is an excellent social venue for our area.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7141 - 744 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7141 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

Respondent: Historic England (Sir/ Madam) [744] Agent: N/A

Full Text:

Re: Preferred Options Public Consultation (19th October - 30th November 2015)

Felixstowe Peninsula Area Action Plan

Thank you for your letter dated 15th October 2015 regarding the above consultation. We have had the opportunity to assess the letter and consultation documents and can offer the following. Please note we have provided comments on the Site Allocations and Area Specific Policies within a separate letter to you dated the same. This follows a previous consultation and our comments dated 25th February 2015.

In terms of our general comments:

Recent Guidance from Historic England

We have recently published guidance on the Historic Environment and Site Allocations. Where we have not made comment below some additional guidance on ensuring a positive strategy for the historic environment is secured within the Felixstowe Area Action Plan can be seen by following this link- http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/.

In terms of our site specific comments:

Housing Sites

FPP4: Land north of Walton High Street, Felixstowe (451g)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the possible impact on the setting of two Listed Buildings, Grade II* Listed Walton Hall and Grade II Listed 362 High Street. We highlighted that the principal elevation of Walton Hall faces north and overlooks site 451g. It was considered that development here would urbanise the setting of this important, highly designated heritage asset, resulting in harm to its significance. It was expressed that harm would also be caused to the Grade II lodge and we strongly advised that an alternative site was found for development, though it was thought that there may be scope for some limited development at the eastern end of this site. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. The policy does however highlight that the development will need to be sympathetic to the Listed Buildings found at Walton Hall and 362 High Street. Whilst this would go some way to allay our concerns we still recommend that whilst it is considered the site can take a level of development there would be a detrimental harm to the setting of the Listed Buildings if the whole site is developed. If the site is to remain in the plan we would advise that the western end of the site is left relatively undeveloped to help protect the setting and it is considered that this side of the site might lend itself to fulfil the Public Open Space requirement.

FFP5: Land north of Conway Close, Felixstowe (502e)

We welcome the acknowledgment of the Listed Buildings and the requirement that development will need to be sympathetic to the Listed Buildings within the policy. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FFP6: Land opposite Hand in Hand Public House, Trimley St Martin (451b)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of two Grade II Listed Buildings (the Hand in Hand public house and Nos 251 and 253 High Road). We highlighted that both these buildings are traditional vernacular structures that date back to the agrarian origins of the village, and their current proximity to open countryside contributes to their setting and significance. We therefore encouraged the Local Planning Authority to identify alternative sites if at all possible so that the setting of these two buildings might be protected. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. However, it is also acknowledged that the policy requires a village green to be included within the scheme. The village green is to front High Road in order to reduce the impact on the setting of the Hand in Hand public house and this is particularly welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP7: Land off Howlett Way, Trimley St Martin (451c and 451d)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of the two Grade II listed churches and the Grade II listed Old Rectory. Whilst it is acknowledged that the consideration of the setting of the rectory is included within the policy, and this is welcomed, we would advise that the setting of the churches is also included. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP8: Land off Thurmans Lane, Trimley St Mary (383f and 451f)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of Grade II Listed Building Mill Farmhouse. It is acknowledged that there is a requirement in the policy that the development will need to be sympathetic to the setting of the mill and this is welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

Town Centre

FFP14: Felixstowe Town Centre and FFP15: Retail Frontages

As outlined within our response to you dated 25th February 2015 it is considered these policies should cover

C - 7141 - 744 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7141 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House. Trimley St Martin

conservation and design issues. It is considered the policies should highlight the importance of retaining or restoring historic shopfront features both in terms of the positive contribution historic shopfronts make to the character of an area but also the economic benefit of providing traditional and bespoke shopping units to shopowners. A good example of how historic shopfronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a National success. The council have also seen a ripple effect of surrounding properties being restored. As well as including conservation and design issues within these policies the Council could consider additional advice within a Supplementary Planning Guide on Historic Shopfronts, especially given the importance and contribution the Historic shopping areas within the settlements of Suffolk make to the wider area.

District Centres

FPP17: District Centres

As above it is considered that this policy should cover conservation and design issues. It should highlight the contribution the Historic Environment makes to the economic success of district centres and seek to protect and enhance both the setting of historic assets and assets themselves.

Tourism and Sea Front Activities

We welcome the inclusion of a section which covers tourism and seafront activities. It is considered that point 6.03 on page 61 could also acknowledge and highlight the wider and more general positive contribution to Felixstowe that heritage tourism brings.

FFP18: Felixstowe Ferry and Golf Course, FFP19: Felixstowe Ferry Golf Club to Cobbolds Point, FPP20: Cobbolds Point to Spa, FPP21: Spa to Martello Park and FFP22 Martello Park to Landguard We welcome and support the acknowledgement and required protection of the historic qualities of these sections of the coast.

FPP23: Car Parking

We welcome the 'high quality of design' requirement relating to replacement car parking at point 6.36 on page 72. It is considered that this requirement should be included within the policy itself to give it more weight in decision making.

The Environment

We welcome the inclusion of a section on the Historic Environment which sits separately from landscape and ecological elements. We also welcome the section on Locally Listed Buildings and Features. It is considered the Historic Environment section should also highlight Felixstowe's archaeology.

It is acknowledged that no individual policies on the Historic Environment are proposed for the Area Action Plan itself, relying instead on saved policies within the Core Strategy and the National Planning Policy Framework. The Core Strategy does not have a specific historic environment policy, with certain aspects covered in other policies such as SP15 (Landscape and Townscape) and DM21 (Design Aesthetics) and policies for specific settlements. It is considered that there is a lack of a clear strategy relating to the Historic Environment, relating to local issues, at present, and we would encourage greater clarity. This should set out the Council's approach to the management of designated and non-designated heritage assets (including archaeology) and how issues such as heritage at risk will be tackled. It is considered that a Historic Environment Policy could be locally specific to cover the Felixstowe Peninsula Area Action Plan.

In addition to the above it is acknowledged that the issue of Felixstowe South Conservation Area At Risk is not being covered by the Plan. We therefore reiterate our previous comments as follows, it would be advantageous if the Area Action Plan identified specific policies to help remove it from the register. These might include utilising the conservation area appraisal to identify locally important buildings that contribute positively to the conservation area, and introduction Article 4 directives to protect such buildings. There may also be sites which are considered negative contributors to the character and appearance of the conservation area and the preparation of development briefs for such sites might help bring forward positive redevelopment. The conservation area survey identified the loss of architectural detail as a significant problem, and consideration might therefore be given to applying to the Heritage Lottery Fund for a Townscape Heritage programme for the area, or a smaller partnership scheme with Historic England to reinstate lost architectural details on key buildings. We would therefore still recommend the inclusion of a policy which tackles the issues at Felixstowe South Conservation Area.

FPP26: Areas to be Protected from Development

In our response to you dated 25th February 2015 we expressed concerns regard the inclusion of all the sites in Trimley St Martin which would in effect surround a number of Listed Buildings including Grade II listed churches, the Grade II listed Old Rectory and Grade II Listed Building Mill Farmhouse. We recommended the inclusion of an area to be protected from development which would protect the remaining green wedge and as a result protect the setting of a number of Listed Buildings. It is acknowledged that the green wedge within Trimley St Martin is proposed to be included within the Areas to be Protected from Development and this is particularly welcomed and supported.

FPP27: Historic Park and Garden

We welcome the inclusion and the content of this policy.

C - 7141 - 744 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7141 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

Other Issues

Coastal Change Management and Areas of Flooding

We welcome the inclusion of this section. It is considered this section should also contain a paragraph on issues and opportunities of climate change and flooding relating to the Historic Environment. Further guidance on flooding issues can be found here- http://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/.

For information and for further policy consultation please note our new consultation email address for the East of England, eastplanningpolicy@HistoricEngland.org.uk.

Summary:

Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. However, it is also acknowledged that the policy requires a village green to be included within the scheme. The village green is to front High Road in order to reduce the impact on the setting of the Hand in Hand public house and this is particularly welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7175 - 3162 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7175 Object

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House. Trimley St Martin

Respondent: Denise Scott [3162] Agent: N/A

Full Text:

Whilst I appreciate the need for new housing in the Felixstowe peninsular I cannot see how all these houses in the villages of Trimley St Martin and St Mary can be justified. The road is busy now as people DONOT use the A14 to go in and out of Felixstowe and it is further gridlocked whenever there is an accident on A14 Presumably the Thurmans Lane access though Josselyns will create problems on the High Road

The on going development on the mushroom farm has access via the roundabout which is an excellent but how many of these cars will

- (a) turn left to go towards the A14
- (b) turn right to Felixstowe instead of going straight to the Kirton roundabout and on to the A14

Which brings me to the proposed development at the old poultry farm will the access be onto Howlett Way or the roundabout on High Road?

The proposed dwellings opposite the Hand in Hand will generate even more cars on this busy section and the concreting of land will I am sure result in more surface water run off. It mentions that this development will not go beyond 21 Grimston Lane presumably so the farmer can still access some of the agricultural land

The drains sewers are outdated can they take any more development without being updated

When I mentioned to your officer at the consultation why is the infrastructure not sorted before building houses he said that's the way it is!

Of the preferred options if we MUST have some dwellings I suppose the old poultry farm development seems the logical choice accesswise which hopefully will not result in more cars using the high road through our villages.

And hopefully this being a larger development of mixed houses will include some affordable houses for the younger generation of the village.

With all these proposed dwellings the villages will become suburb of Felixstowe.

Summary:

The proposed dwellings opposite the Hand in Hand will generate even more cars on this busy section and the concreting of land will I am sure result in more surface water run off. It mentions that this development will not go beyond 21 Grimston Lane presumably so the farmer can still access some of the agricultural land. The drains sewers are outdated can they take any more development without being updated.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7253 - 312 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7253 Object

Housing Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

Respondent: STAG (Mr Ian Cowan) [312] Agent: N/A

Full Text: Consultation Response: Felixstowe Peninsula Area Action Plan

I am making this response by e-mail because the online consultation system is cumbersome and confusing.

Here is my response to the Felixstowe Peninsula Area Action Plan Consultation Document.

One: The so-called housing need in the Felixstowe Peninsula Area Action Plan does not recognise that according to the 2011 Census the population of Felixstowe and the Trimley Villages shows a downwards instead of an upwards trend. This means that houses already built an in the pipeline should be more than sufficient for future needs.

Two: The Felixstowe Peninsula Area Action Plan dishonestly has ignored firm promises made in the Local Plan that the housing needs evidence base will be updated by 2015 to take account of Census movements. An honest re-evaluation would confirm my comments at One above.

Three: When housing numbers are mentioned in the Felixstowe Peninsula Area Action Plan they are usually prefixed by the weasel words "a minimum". Therefore, so far as Trimley St Martin is concerned, there will be a minimum of 70 houses opposite the Hand In Hand and a minimum of 330 houses at Howlett Way. Add the 66 houses currently being constructed at the Mushroom Farm and this will give a minimum of 496 extra houses in the village. There will also be a minimum of 1,810 throughout the Colneis Peninsula

Four: A minimum of 496 extra houses in Trimley St Martin is disproportionate to the number of houses proposed for other, larger conurbations.

Five: A minimum of 496 extra houses in Trimley St Martin will disproportionately increase the population of the village from around 1,900 to over 3,000.

Six: A minimum of 496 extra houses in in Trimley St Martin will completely alter the character of the village.

Seven: A minimum of 496 extra houses in Trimley St Martin will generate and extra 2,500 weekday traffic movements on an already busy High Road. Add a further 2,500 traffic movements from the minimum of 500 extra houses proposed for Trimley St Mary and Walton and traffic congestion along the whole length of the High Road will become considerably worse. Current traffic pinch points at Seamark Nunn, RS McColls and elsewhere could become even more dangerous than they already are.

Eight: Little thought seems to have been given to the provision of extra primary school places which will be required in both Trimley Villages from a minimum of 996 extra houses.

Nine: Little thought seems to have been given to the provision of extra medical facilities which will be required from a minimum of 996 extra houses / over 2,000 extra people in both Trimley villages, as well as elsewhere on the Colneis Peninsula. For example, the Grove Surgery is already so short of doctors that appointments can now only be made on the day, and it is not uncommon for all appointment slots to be fully booked by 8.20 am. The situation will only be acerbated by a minimum of 1,810 houses / over 3,600 extra people on the Colneis Peninsula.

Summary:

When housing numbers are mentioned in the Felixstowe Peninsula Area Action Plan they are usually prefixed by the weasel words "a minimum". Therefore, so far as Trimley St Martin is concerned, there will be a minimum of 70 houses opposite the Hand In Hand and a minimum of 330 houses at Howlett Way. Add the 66 houses currently being constructed at the Mushroom Farm and this will give a minimum of 496 extra houses in the village. There will also be a minimum of 1,810 throughout the Colneis Peninsula.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7263 - 3934 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7263 Object

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

Respondent: Mr & Mrs Williams [3934] Agent: N/A

Full Text:

Preferred Options Public Consultation Response form

- *□Do you think that the Council has selected the most appropriate preferred options?
- * Are the policy requirements justified and do they meet the needs of the local community?
- * Can you suggest a more suitable approach than that outlined?
- * Are there any other alternative options that need to be considered?
- * Do you agree with the findings of the sustainability appraisal assessments undertaken?
- * Do you have any other comments on the preferred options documents?

Please indicate to which document your comments relate to?

Felixstowe Peninsula Area Action Plan

Your comments:

*Do you think that the Council has selected the most appropriate preferred options? In short, sorry, but No...

Although one or two small scale sites within the town and Thurman's lane (ref 383f &451f)would seem to be logical extensions of existing past development which, with suitable precautions discussed later, could be seen as acceptable use of land, the three preferred options for the Trimley villages and Walton will fundamentally change their characters.

There are several views, (Vistas if you like) clearly seen as you walk or drive around the area, that positively `define` the demarcation of these three distinct communities.

These demarcation, `vistas, ` can be seen, from the high road, the A14, or both.

If the preferred options, shown are used, then these demarcations and vistas will be lost forever, and a homogenised sprawl, from the sea, to the very edge of the Trimley's will be inevitable.

With further likely expansion taking place during the next stage (2027) there is a high probability that any remaining gaps will be `filled in,` as the precedent will have then been established.

I have indicated these vital sightlines on the modified map at the end, along with possible alternative and equivalent sites I refer to the preferred options (PO)

- 1) for land off Howlett way ref 451c &451d
- 2) land North of High Street, Walton ref 451g
- 3) land opposite Hand in Hand public house ref 451b
- 4) land North of Conway close ref 502e

1)

the SE view from Howlett way looking towards Felixstowe, across agricultural land gives a clear separation, from the substantially developed estates on the other side of this road, looking NW.

This is further reinforced by the view SW across to the Orwell, Albeit, at this stage, outside the red boundaries but in 2027, that too, could change?

The ongoing `Mushroom farm` development, has happily not significantly spoiled this perception of open countryside. This PO area, surrounded by footpaths, is extensively used by local residents of both communities, for horse riding, dog walking, and rambling, precisely` because`, the area, is, undeveloped.

Substantial bird and wildlife thrives within the area and is a valued resource for enjoyment.

A similar area could be produced, if the boundaries were extended north, to the other side of the A14 (shown on modified map - see attached document) that would prevent coalescence along the high road and reduce traffic impact, along the high road substantially, as easy access to A14 is possible.

2) Land North of High Street, Walton ref 451g

The wide demarcation of Walton and Trimley St Mary, is clearly seen and felt, when looking north from the high road, but hardly noticeable (due to banking), when looking South from the A14/A15d.

If this PO is used, Walton will simply merge into one with Trimley St Mary..... Especially as it is opposite an existing, approved planning application for a large development, the result ... Horrible!

However along the N boundary a smaller 'strip' development could, with good tree screening, and substantial setback, still not affect this natural gap too profoundly, giving say 200, 300 homes?

still not affect this natural gap too profoundly, giving say 200 -300 homes?

Again the land north, on the other side of the A14 would give a similar area and have easy access onto the roundabout, still leaving good vistas from the road as shown on my modified map [see attached document].

3) Land opposite Hand in Hand public house ref 451b

The spectacular views, looking South across the country side from the` Hand in hand` area, will be destroyed even if only a single frontage was permitted, and of more concern `allow` an entirely feasible, further expansion to the railway in 2027, once the excursion across the high road is established.

Although fortunately in this case, it would not 'link' two separate communities, just extend one.

However, if the area NE, and opposite Goslings farm were to be used, a similar area with good access would be available, without extending the extent of the village inordinately?

4) Land North of Conway close ref 502e

The other preferred option north of Conway close, looks innocent enough, until again, it is realised that adjacent land to the East, has already been granted planning permission, so the `white` area is somewhat misleading, as that

O - 7263 - 3934 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7263 Object

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

development has already removed the view for the existing residents.

But it use would not appear to coalesce any discreet areas, as 1) and 2) do, so like 3) is mainly the expansion of an existing community.

The two 'orange' areas of no permitted development, are certainly needed.(and appreciated)

Of concern however, is once the preferred options are established, it takes no great stretch of imagination to surmise that these two areas of `no development` will be the next to be `filled in` when the AAP is reassessed in 2027. If that were to take place, any pretext of individual villages and communities would then be farcical.

If alternative options could be chosen, either as suggested or elsewhere by yourselves, it would be far less likely that everything could be amalgamated later.

- * Are the policy requirements justified and do they meet the needs of the local community?
- * Can you suggest a more suitable approach than that outlined?
- * Are there any other alternative options that need to be considered?
- * Do you agree with the findings of the sustainability appraisal assessments undertaken?
- * Do you have any other comments on the preferred options documents?

The other questions posed above require, I feel, a slightly different approach and response.

I have read through countless documents, counter arguments and counter proposals, about the need for this many homes, employment, infrastructure etc, from 2009 until 2012 when the basic framework was established by the government/local government.

These discussions were far more eloquently expressed by the S.T.A.G (Save Trimley Against Growth) and N.A.N.T. (No Adastral New Town) representations, than I could possibly achieve, and yet failed to modify the `official` stance.

Therefore I feel the above battles have been fought and lost long ago, and now we are at the `Damage limitation` stage of the proceedings, although hopefully this will nonetheless be productive.

Similarly the sustainability assessments, apart from being largely unfathomable, use criteria that will always be subjective, and can be `adjusted` to suit the needs of the chosen decision.

These 'battles' have likewise, been argued over and lost long ago.

Finally, It would be naive, not to perceive the hand of Trinity College in all of this, especially since their `Vision` of `their` land was published a few years back, and their `influence` when attempting to realise the maximum return for the land, with no real empathy for everyone affected.

This at least leaves us with at least the possibility of 'tinkering' with the preferred options, using yourselves, as our 'voice' and 'buffer' to make these decisions slightly more 'palatable' to all of us who 'will' be affected.

Therefore my next section will be on those preferred options but here is my take on the areas which may affect less people, but the land may not be that (cynically) chosen by Trinity College.......

[see attached document]

Site Allocations and Area Specific Policies

* Do you have any other comments on the preferred options documents?

As mentioned under my comments on the `Felixstowe Peninsula Area Action Plan`, I am assuming those options, will now likely go ahead regardless, and we are in a sort of `damage limitation` stage?

The preferred options for land off Howlett way ref 451c &451d

I know well the cliché "Not in my backyard" but in this instance it `IS` very much in our backyard, and obviously we/all, the existing tenants who are affected, have a vested interest, especially as we have `in` vested` considerable money and time to live here, and for all the qualities of life, it provides.

Equally, for all my working life, my career was in the building industry, including design and planning, before finally teaching it to HNC level. Therefore I do know, that a well thought out development, can work, and work well, and executed sensitively, need not unduly destroy an area.

So what were the reasons we chose to live here, and what features need to be protected, so that many more can share and enjoy this resource, should they soon live here, with ourselves...?

Well the area where we live has some wonderful and surprising features, which make it, just what it is... Simply put, it is pure Countryside.....

Entering from the high road, and within barely 10m of walking down Thurmans, or Church lane, you immediately disappear into an archetypical `English` setting, unspoilt in a hundred years as evidenced by photos. Leaves and mud on the road greet you as you walk down. The bustle and noise fade rapidly away, and then you emerge into a 100 acre field where fox and rabbits play.

A rich variety of birds sing in the foliage and crops. You give a greeting to a horse and rider, then a walker, for there are many.. Traffic although near, sounds distant, and fails to spoil the setting.., you can enjoy the big skies, with its sunrises and sunsets, or If you chose `Dark` starry nights, with owls, and fox's cries, and distant lights through the rustling trees......,

O - 7263 - 3934 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7263 Object

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

All this, within the boundaries, of three busy roads. A true haven of peace within....

Any future development should endeavour to preserve all of this, especially for the existing tenants, and by incorporating such features, it would surely benefit any new dwellers life too, even if only at its peripheries, for then, they too, could walk with ease into this time warp or jet off down the A14 to town as is their choice, as we do.

There are also two, one hundred year old oaks in the centre that do not appear to have TPOs on them, but would surely be an asset within an open area for the development?

Likewise, a 1940s WW2 `pillbox` remains that should be preserved for posterity, and could easily become a feature within a development, either as a viewing platform (it has steps to a walled roof as it was also an anti aircraft position) or like the control tower at Martlesham Heath, a heritage site with information displays and focus of a park area.

My modified map [see attached document] shows some ideas that could help achieve this, but the simple principals are, to shield old from new, by leaving a broad band of untouched land (say 15m) around the boundaries with a screening of trees, that would preserve countryside views from both sides, and leave all the above, for all to enjoy.... Oh, And soft street lighting PLEASE, for preserving the dark night skies...Most planners, forget that, important feature of the `countryside`

It is paramount (and very much appreciated) that both Church lane, and Thurman's lane, are to be classified as `protected` lanes, and not to be used for access, to any new developments.

These peaceful routes provide part of that countryside experience. Please, cast this decision irrevocably in Stone. Any increase in (vehicle) traffic would destroy them.... Walkers and cyclists welcome...

The orange area to be protected from any developments is also vital to preserving this encircled haven of our countryside, so easily accessible from both Trimley villages.

It will also maintain that important historical separation of them.

Finally, the protected area should, provide an alternative home for the displaced, birds and wildlife, especially if several dead trees are replaced and give that haven of tranquillity for them within, for all of us to enjoy.

Thank you for protecting it, But again, please cast it in stone for all perpetuity, as it is only too easy to `fill it in later`, with the loss of all of the above.

[see atached document for revised maps of following:]

Land off Howlett way ref 451c &451d Land south of Thurmans Lane Ref 383f & 451f

This development, like Howlett way above, will affect existing tenants on three side. But with similar peripheral treatment of screening trees and scrub type band, will again separate both new and old from both directions.

Not allowing Thurmans lane to be used for access will preserve the `haven` of timeless countryside within the orange protected zone for both communities and indeed forms a circular route for both Trimley's

Land North of High Street, Walton Ref 451g

This area provides a clear division between Walton and Trimley St Mary, when looking North from the high road, but barely visible from the A14 /A15b

As this must also be taken in conjunction with the approved development opposite behind Walton hall, it would seem imperative to keep any development screened from the high road.

The old stables and Dutch house, will help this illusion, but need to be extended along the entire High Road frontage, with a decent `set back` to a solid new tree line.

And now to another `vested interest....

The need to have the rifle club relocated before any development can continue (Para 3.27)

Could easily be made redundant, if the club could remain where it is. The club has no desire to move.

It would also provide the buffer mentioned in Para 3.29 and is a natural visual break along with the old stables for demarcation of the areas

Any possible noise issues could be solved with banking and/or trees as with the accepted C13/0967 planning application for elsewhere

For the developer, the small loss of building land would be offset by the ability to start work forthwith. The club has a strong affiliation with Mencap, RNIB and national sports bodies, a real asset to the local populace, that could easily disappear if evicted, as we are never likely to raise enough money to do so..

[see atached document for revised map of following:]

Land North of High Street, Walton Ref 451g

Sunday market site sea Rd ref 1011c

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Although not part of the argument for preserving historic `vistas` (indeed it was once a building)

the choice to develop the Sunday market will deprive the town of one of its significant venues, for tourism, and used by hundreds of local and outside visitors.

The surrounding retailers will undoubtedly lose a significant amount of passing trade and helps keep this area `alive` and clearly part of the tourism area (Para 6.22)

I can find no mention of a similar, alternative site.

[see atached document for photographs of following:]

Havens of peace within Land off Howlett way ref 451c &451d Looking due south from drain and the old Rectory Northern boundary Possible viewing point on 1940s pillbox and the old oaks looking North End of Church lane looking North..wildlife & tranquillity reign within three busy roads

NB unploughed borders are the suggested 15mtr 'No man's land Buffer zones

Summary:

The spectacular views, looking South across the country side from the` Hand in hand` area, will be destroyed even if only a single frontage was permitted, and of more concern`allow` an entirely feasible, further expansion to the railway in 2027, once the excursion across the high road is established.

Although fortunately in this case, it would not 'link' two separate communities, just extend one.

However, if the area NE, and opposite Goslings farm were to be used, a similar area with good access would be

available, without extending the extent of the village inordinately?

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

Preferred Options Public Consultation Response form.pdf

C - 7310 - 3949 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7310 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House. Trimley St Martin

Respondent: Pigeon Investment Management Ltd [3949] Agent: Strutt & Parker (Mr Richard Clews) [3945]

Full Text:

1 INTRODUCTION

- 1.1 This representation has been prepared by Strutt Parker LLP on behalf of Pigeon Investment Management Ltd in respect of land at Trimley St Martin, Alternative Option Site 3022a in response to the six week public consultation (19th October 2015 to 30th November 2015) on the Felixstowe Peninsular Area Action Plan, Preferred Options Document, hereafter referred to as the Felixstowe Peninsular AAP. It should be read in conjunction with the following documents copies of which are contained within the appendices and summarised in the delivery statement section of this consultation response below:
- * Site Plan;
- * Indicative Layout Plan;
- * Preliminary Drainage Appraisal October 2015;
- * Desk-based Archaeological Assessment;
- * Landscape and Visual Assessment;
- * Preliminary Ecological Appraisal; and
- * Transport Report
- * Phase 1 Contamination Report

2 EXECUTIVE SUMMARY

- 2.1 As set out in these representations there are some fundamental concerns regarding the soundness of the Felixstowe Peninsular AAP and the Area Specific Policies Development Plan Document (DPD). These relate specifically to the approach adopted and the plan's failure to allocate suitable sustainable sites to address the issues arising from the failure to clearly identify up to date objectively assessed housing need for the District. There appears to be a conflict with Policy SP2 of the Core Strategy (2013) and the requirements of the National Planning Policy Framework(NPPF).
- 2.2 In respect of the Felixstowe Peninsular AAP, at a site specific level, the concern is that the plan fails to take the opportunity to allocate additional land at Trimley St Martin in accordance with the development strategy set out in the adopted Core Strategy. The site in question, Alternative Option Site 3022a, was identified as suitable in the SHLAA 2014.

It is sustainable, available and deliverable. It would represent a logical extension to the physical development limits of the village. In accordance with the presumption in favour of sustainable development and the need to boost significantly the supply of housing it is contended that it should be included as a Preferred Allocation.

3 POLICY BACKGROUND

- 3.1 The Site Allocations and Area Specific Policies Development Plan Document Preferred Options Consultation Document, October 2015 has been published for public consultation along with the Felixstowe Peninsular AAP. These two documents seek to provide the policies and allocations necessary to implement the strategic policies set out in the Suffolk Coastal District Local Plan Core Strategy and Development Management Policies, July 2013 document. Together the Core Strategy, Site Allocations and Area Specific Policies Document and the Felixstowe Peninsula AAP will form the Development Plan for Suffolk Coastal District Council.
- 3.2 While this representation relates to the Felixstowe Peninsular AAP preferred options document and more specifically proposed allocations in the village of Trimley St Martin, it also has to be considered in the wider context of the planning policy framework for the whole of the District.

4 NATIONAL PLANNING POLICY FRAMEWORK

- 4.1 Paragraph 14 sets out that "a presumption in favour of sustainable development" is at the heart of the Framework and describes this as "a golden thread running through both plan-making and decision taking." It goes on to state that for plan- making this means:
- * "Local planning authorities should positively seek opportunities to meet the development needs of their area;
- * Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change..."

These requirements are repeated in more detail throughout the Framework. Paragraph 15 requires the presumption in favour of sustainable development to be applied to local plan policies so that development which is sustainable can be approved without delay.

- 4.2 The Core Planning Principles set out at paragraph 17 include a set of overarching objectives which should underpin plan making. Of particular relevance to this consultation response are that planning should be:
- * plan-led with up to date plans providing a practical framework for predictable and efficient decisions.
- * Not be about scrutiny but be a creative exercise.
- * Proactively drive sustainable development to deliver the homes the country needs.
- 4.3 Every effort should be taken to objectively identify and meet the needs of the area. Sufficient land suitable for development having regard to market signals should be
- 4.4 Paragraph 47 sets out a clear challenge to local planning authorities "to boost

significantly the supply of housing..." In order to achieve this they should ensure

that their Local Plan meets the full objectively assessed needs for the area and they should identify and annually update their five year housing supply.

4.5 For plan-making paragraph 151 advises that Local Plans should be consistent with the policies and principles of the Framework, "...including the presumption in favour of sustainable development."

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- 4.6 Paragraph 154 requires Local Plans to be "...aspirational but realistic" and paragraph 159 reminds local planning authorities that they "...should have a clear understanding of housing needs in their area."
- 4.7 Finally, for a local plan to be found sound at examination by an independent inspector the Framework at paragraph 182 advises that it should satisfy the following tests, namely that it is:
- * "Positively prepared the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- * Justified the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- * Effective the plan should be deliverable over its period and based on effective joint working on cross- boundary strategic priorities; and
- * Consistent with national policy the plan should enable the delivery of sustainable development in accordance with the policies in the Framework."
- 4.8 For the purposes of this consultation it is necessary to consider whether the Felixstowe Peninsular AAP satisfies the above objectives.

5 APPROACH TO HOUSING GROWTH

Core Strategy

5.1 At the strategic level housing numbers and distribution are set out in the Core Strategy.

Objective 2 states:

"To meet the minimum locally identified housing needs of the district for the period 2010 to 2027, taking into account existing and future economic,

environmental and social opportunities and constraints'

In respect of this objective there are two important points to note. Firstly, that the Core Strategy seeks to meet the minimum locally identified housing need, and secondly, that it is a locally identified housing need for the plan period. 5.2 However, it is considered given the acknowledged short fall that the DPD and AAP should be based on the NPPF principles set out above including; to be aspirational; provide flexibility; positively seek to meet identified needs; and most importantly, to significantly boost housing supply. It is therefore considered that the Felixstowe Peninsular AAP should be setting its own, up to date and ambitious objectives.

- 5.3 Core Strategy policy SP2 sets out housing numbers and distribution. However, policy SP2 notes that provision will be made for at least 7,900 new homes, distributed in accordance with the settlement hierarchy set out in policy SP19. The policy then goes on to commit to an early review in order to identify the full objectively assessed housing needs for the District, to ensure this is met in so far as this is consistent with the policies of the NPPF.
- 5.4 The Inspector's report in respect of the Core Strategy Examination (June 2013) made it clear that an early review was essential as at the time the Council had identified an objectively assessed need of 11,000 dwellings. At paragraph 46 of the Inspector's Report he commented:

"Even if the theoretical capacity of all the sites included in the Strategic Housing Land Availability assessment (SHLAA), existing commitments potential brownfield opportunities, allocations carried forward from the previous Local Plan and a windfall allowance were taken into account, the provision would fall some way short of the 11,000 dwellings required."

5.5 At this point, the Inspector clearly gave consideration to suspending the Examination. However, he concluded that as none of the adjoining Councils had objected to the scale of housing proposed, that having a core strategy in place with an early review would be preferable to the alternative of suspension of the examination and the likely withdrawal of the plan.

5.6 While it is noted that the Site Allocations and Area Specific DPD Issues and Options consultation commenced in 2015, it is of significant concern that this occurred ahead of the objectively assessed housing needs for the District being reviewed, updated and firmly established. Policy CS2 states:

"An early review of the Core Strategy will be undertaken, commencing with the publication of an Issues and Options Report by 2015 at the latest. The review will identify the full, objectively assessed need for the District and proposals to ensure that this is met in so far as this is consistent with the policies in the National Planning Policy Framework."

5.7 On the basis of the currently available information the Felixstowe Peninsular AAP and the DPD are inconsistent with this adopted policy, and paragraph 158 of the NPPF which requires that the Local Plan is "...based on adequate, up-to-date and relevant evidence..."

5.8 Table 3.1 of the Core Strategy references the need for an extra 11,000 dwellings as identified in the work commission by Oxford Economics (OE) in 2010. It goes on to suggest that the review should identify land to meet the current acknowledged shortfall between the locally assessed requirement and the OE objectively assessed need (OAN). However, the District still does not appear to have a published understanding of its current OAN. The OE figure of 11,000 dwellings is very old and predates the NPPF. As advised in Planning Practice Guidance regarding housing need assessments, the household projections published by the Department for Communities and Local Government provide the starting point estimate of overall housing need (ID: 2a-015-20140306). The DCLG estimate may require adjustment to reflect factors affecting local demography and household formation rates. However, the Sub National Household Projections (2015) suggest a growth of 8,362 for the period 2010 to 2027 and this is not

referenced in the SAASP document or the AAP. This indicates that the Core Strategy figure promoted in the SAASP is out of date. While the DCLG figure is lower than the OE figure, it is clear that the Core Strategy proposal to provide 7,900 homes is lower than the most recent projections that the Council should be considering as a starting point for

C - 7310 - 3949 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7310 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

understanding its OAN. On the basis that the 2010 OE figure was 11,000, the reality is that the actual objectively assessed need figure is likely to be higher than 8,362 and that 7,900 would fail to meet the OAN.

5.9 Policy FPP1 of the Felixstowe Peninsular AAP gives the impression that it is still working to the Core Strategy target of 7,900 and does not explain if it is actually working to the OE figure or some other estimate and if so what that actually equates to for the AAP. On this basis there must be a concern that at examination the Felixstowe Peninsular AAP will not be found to comply with the tests set out in paragraph 182 of the NPPF, failing all the tests.

Five Year Housing Supply

5.10 In June 2015 Suffolk Coastal District Council published a Housing Supply Land Assessment. This covers the period 1st April 2016 to 31st March 2021 and identifies the current position with regard to identifying a five year +5% supply of housing land which it assess as 5.12 years.

5.11 Paragraph 3 acknowledges the supply in 2014 was 4.3 years this is a figure which has been borne out in appeal decisions as recently as September 2015

(APPJ3530/A/14/2225141). Fundamentally, the current assessment is still based on the Core Strategy target of 7,900. As set out above, this is an acknowledged under estimate of the actual objectively assessed need, which in the absence of anything more up to date, on the best available evidence suggests a target in the region of 11,000 dwellings. 5.12 In addition, it is also observed that the projections contained in table 3 still appear to rely on the early unconfirmed delivery of some large developments with outline permission which are still subject to S106 agreements. Taking these factors into consideration the five year supply with a modest surplus of 0.12 years, must reasonably be considered vulnerable to challenge at this time. If the 11,000 dwelling figure or even the lesser DCLG Household projection of 8,362 are applied then a five year supply in all probability does not actually exist and is at best 4.75 years.

5.13 Again, this point suggests that the Felixstowe Peninsular AAP will struggle to

demonstrate compliance with paragraph 182 of the NPPF at examination and reinforces the need to allocate additional land within the AAP.

Felixstowe Peninsular AAP

5.14 The overall spatial strategy set out in the Core Strategy (see policy SP2) provides for development to be focused in the Eastern Ipswich Plan Area, at Felixstowe and the Trimley Villages and shared between the market towns. Policy SP19 identifies that Felixstowe, Walton and the Trimley Villages will accommodate a proposed housing growth of 22%. Furthermore the Strategic Housing Land Availability Assessment (March 2014) acknowledges:

"The core Strategy expects the Market Towns and the Felixstowe and the

Trimleys area to accommodate a considerable proportion of the growth identified for the district to 2027".

5.15 The Felixstowe Peninsula AAP in policy FPP1 identifies a minimum requirement for a further 807 units before 2027 as necessary to meet the Core Strategy requirement. However, as previously mentioned above these figures are a minimum and the AAP should be seeking to maximise delivery in sustainable locations in order to boost significantly the supply of housing as required by the NPPF. It is therefore contended as set out in more detail above, that policy FPP1 should be setting a more ambitious target, and in the absence of any more recent objectively assessed need, looking to a District target of 11,000 dwellings rather than the 7,900 derived from the Core Strategy. Policy FPP1 should therefore be reworded to identify a higher overall target and as such an appropriate apportionment, for Felixstowe Peninsular. 5.16 It must be acknowledged that the AAP states at paragraph 3.13:

"The Felixstowe Peninsula AAP identifies over 1,100 units on the preferred sites outlined in this document. The Council consider it necessary to over allocate sites across the district to ensure that a five year land supply is maintained which is paramount. Over allocating also provides a range of sites, sizes and locations for development to allow a choice of location for those looking for a residential property. It also takes into account that the population is growing and that the Council's objectively assessed housing need is likely to increase in the future.

The delivery of sites will be monitored throughout the plan period to consider how the AAP is performing against the Core Strategy targets."

5.17 While this additional provision is welcome, it is still unclear if it will provide sufficient sites, which are available and deliverable, to enable the District to demonstrate a five year housing land supply in the short term. The current five year supply is not based on an up to date objectively assessed need. It is therefore contended, that opportunities should be taken to allocate more sustainable sites that can be delivered in accordance with Core Strategy spatial strategy so that the District can significantly boost its supply of housing as required by the NPPF. These sites should allow for variety in house types and

tenures to come forward to meet local needs and ensure choice and competition in the market for land (NPPF paragraph 47).

5.18 From the statement in paragraph 3.13 the Council appears to be acknowledging that the objectively assessed need is rising and site allocations should reflect this. It would therefore seem logical, and in the interests of good planning, for them to plan to meet this need now, by way of the allocation of further sustainable sites.

Felixstowe Peninsular AAP Preferred Site Allocations

5.19 The Felixstowe Peninsular AAP identifies 7 sites as preferred option allocations. Two of these are in Trimley St Martin and one in Trimley St Mary and are identified on the inset maps in the AAP. A summary of the 7 sites is set out below along with some brief summary observations in italics which are considered relevant to this consultation response: 5.20 Preferred Policy FPP3: Land at Sea Road, Felixstowe

Land is identified at Sea Road, Felixstowe for a mixed use development of commercial /tourism uses and residential dwellings. (Indicative Capacity 40 dwellings)

C - 7310 - 3949 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

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Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

It is noted that this is a mixed use site and residential development will be dependent on

There is also an issue with sewage capacity which may impact on viability. Finally if the market has to be relocated this could also significantly delay delivery.

5.21 Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

Land is identified north of Walton High Street for a mixture of residential units; including on site open space,

comprehensive landscaping and new business units. (Indicative Capacity 400 dwellings)

This site is dependent on the Rifle Club being relocated, requires a master plan to

include a link road which could in turn impact on viability. The policy acknowledges that it is likely to be a longer term opportunity. There are also air quality and sewage capacity issues to be resolved.

5.22 Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Land is identified to the north of Conway Close for a residential development. (Indicative Capacity 150 dwellings) The site could come forward, however, there are still sewage capacity and air quality issues to be addressed and the site is adjoined by heritage assets.

5.23 Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St

Martin Land is identified on Trimley High Road for residential development with on site open space to provide a village green. (Indicative Capacity 70 dwellings)

The site could come forward with access on to the High Street. The Public House is a listed building and therefore development proposals will have to be sensitive to its status which may limit capacity.

5.24 Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

Land is identified at Howlett Way for residential development with on site open space. (Indicative Capacity 360 dwellings)

Access to the site has not been identified in detail other than off Howlett Way. There are air quality issues and concerns regarding the setting of the Old Rectory. In addition there is a water main crossing the site. The site wraps round the Old Poultry Farm and the Old Rectory both of which may delay availability.

5.25 Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

Land is identified south of Thurmans Lane for residential development. (Indicative

Capacity 100 dwellings)

This site could come forward, again it is subject to air quality issues and the need to have regard to Mill Farm a Grade II Listed Building, it will also have to be accessed through the adjoining residential areas.

5.26 Preferred Policy FPP9: Land at Bucklesham Road, Kirton

Land is identified south of Bucklesham Road for residential development. (Indicative Capacity 15 dwellings)

This is a relatively small ribbon development site which could come forward. There are potentially issues to be resolved in respect of local sewage capacity in the village.

Assessment of Preferred Allocations

5.27 If the preferred site allocations indicative capacities are totalled up cumulatively this suggests they could deliver 1,135 dwellings between them. However, as set out above the delivery, and more importantly, the quantum and likely timing of delivery is much less certain. It is noted that the two largest sites, FPP8 and FPP4 do not appear to be very advanced. With this in mind in order to maintain a realistic five year supply it will be important for the District to maintain the delivery of smaller sites which can readily come forward.

6 ALTERNATIVE OPTION SITE 3022A

6.1 The site the subject of this representation, Alternative Option Site 3022a is just such a site and accordingly it is contended that it should be included as a preferred allocation on the basis that it is available and deliverable at the present time. In addition, it does not need to overcome the issues and constraints associated with some of the preferred allocations set out above and as such can contribute to the acknowledged shortfall in housing need, within the first five years of the Plan period. It is also contended that the AAP should be more ambitious in order to meet local housing need and it would be appropriate for the site to be included based on the presumption in favour of sustainable development

6.2 When considering the Trimley Villages and the opportunities for further allocations, Trimley St Mary is the larger of the two settlements and any significant further expansion may potentially undermine the sustainability of it as a village. Trimley St Martin being the smaller of the two settlements would appear to have greater capacity to absorb further growth. Trimley St Mary is also constrained by its proximity to Felixstowe, the ANOB designation to the south-west, the A14 to the north-east and its proximity to Trimley St Martin to the north. There are therefore few obvious alternative locations for the expansion of its physical development limits. On this basis, there is considerably more potential to be looking at a further extension of the physical development limits of Trimley St Martin.

6.3 In so far as this consultation is concerned, clearly a further allocation on the northwestern side of Trimley St Martin would make a positive contribution towards housing delivery. Alternative Option Site 3022a is in a sustainable location and is not environmentally sensitive. It does not represent a risk of coalescence and is a natural and logical extension of the settlement with clear and defensible boundaries. It is contained to the north-east by the allotment gardens, by the existing built development in the western corner, the road and established settlement to the south. As set out below it is a deliverable site with no obvious constraints or limitations. It is available and could come forward very quickly to make an almost immediate contribution to boosting local housing supply. As such, it is considered that it should be identified as a preferred

residential site allocation.

Sustainability Appraisal

6.4 It is surprising that Alternative Option Site 3022a did not score more highly in the Preferred Options Sustainability Appraisal when compared to the preferred sites listed above.

C - 7310 - 3949 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7310 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

6.5 The overall assessment concluded for site 3022a as follows:

"The site scores well in terms of economic effects due to its close proximity to employment opportunities and given relatively good public transport provision. The loss of Grade 2 agricultural soil results in a major negative environmental effect. However, there may be scope for mitigation."

6.6 In response to the major negative environmental effect of using Grade 2 agricultural land, it is clear that there is no difference with the conclusions for a number of preferred allocations. The proposed site is on the boundary of grade 2/3 agricultural land. All undeveloped and proposed allocation sites within Trimley St.Mary and Trimley St.Martin are on Grade 2 Agricultural Land. The proposed site is therefore no more important for protection as agricultural land than the allocated sites and may in fact be less desirable due to the size of the site and the overall quality. One of the objectives where the site did not score very favourably was in respect of SA Objective 8, to improve the quality of life and where people live. The SA comment here incorrectly assumed that the site will be accessed via the adjoining estate roads and as such could potentially result in a negative

impact for local residents. The reality, as set out in more detail in the delivery statement below, is that access can be provided directly on to High Road.

6.7 In respect of the site assessments and commentaries for the preferred allocations set out in the AAP, there appear to be a number of reoccurring themes which do not necessarily appear to be reflected in the sustainability appraisals. These are as follows:

Air Quality: This is clearly an issue with air quality assessments being required for the majority of the preferred allocation sites. This is an issue, particularly associated with proximity of the sites to the urban area of Felixstowe and major transport routes including the A14. In respect of the majority of the preferred allocations, and in particular the largest sites, these are more closely related to the A14 and Felixstowe than Alternative Option Site 3022a. As such, simply on the basis of the degree of separation, it can be concluded that site 3022a will perform better in respect of air quality.

Sewage Capacity: Sewage capacity is an issue raised by Anglian Water in respect of the Felixstowe sites and the site in Kirton. These sites potentially require improvement to the capacity of the foul sewer network. This does not appear to be an issue for the Trimley Villages and as set out in the delivery strategy below a preliminary foul and surface water drainage strategy has already been prepared for Alternative Option Site 3022a.

Noise: The potential impact of noise does not appear to have been given much consideration. It should be noted, that some of the preferred allocations lie adjacent to junctions on the A14. These sites or parts thereof may be susceptible to noise disturbance which may require mitigation and/or potentially reduce the developable area. Alternative Option Site 3022a, lies to the south of the A14 separated by the established allotment gardens and as such is unlikely to be adversely affected by noise from the road.

Transport Assessments: The larger preferred option allocations will require transport assessments to be carried-out. These may potentially reveal highway safety or capacity issues which could impact on the quantum of development achievable and delay delivery. This would not be necessary with the scale of development proposed on Alternative Option Site 3022a.

Heritage Assets: A number of the preferred option sites have a close relationship with existing heritage assets. In some cases the SA scored these relationships to be positive on the basis that the setting may be improved. It does not necessarily seem reasonable that a site that will have an impact on heritage assets should score more highly than one where heritage assets are unaffected as is the case with Alternative Option Site 3022a.

6.8 In conclusion it is clear from the above that Alternative Option Site 3022a has many advantages over some of the preferred allocation sites and there are no obstacles to it coming forward for development. It is in a sustainable location and could readily deliver much needed housing, including affordable housing, a significant social benefit, with very limited environmental consequences. This assessment further supports the case that it should be included as a preferred allocation.

Deliverability

6.9 Trimley St Martin lies to the west of Felixstowe, between the A14 to the north-east and the railway line to the south-west. The village of Trimley St Mary lies immediately to the south east separated by a small gap. The 2011 Census reported the population of Trimley St Mary as 3,673 and the population of Trimley St Martin as 1,932. The two villages are immediately adjacent to Felixstowe and identified in the Core Strategy as Key Service Centres due to their extensive range of facilities and proximity to Felixstowe.

6.10 Alternative Option Site 3022a, is situated on the north-western side of the village. It lies to the east of High Road, which runs parallel with the A14, connecting Felixstowe via the A1156 to Ipswich. The south-eastern side of the site abuts the residential properties of Mill Close with extensive allotment gardens lying to the north-east. The western corner of the site contains a group of existing dwellings and buildings used for commercial purposes. Beyond the site to the north-west are arable fields.

6.11 The site was in part submitted and considered under the SHLAA 2014 (site 383a) it was discounted due to concerns regarding vehicle access. Mill Close was not considered to be suitable as an accesses route and the Highway

C - 7310 - 3949 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7310 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

Authority was not in favour of direct access from High Road.

6.12 Since 2014 extensive work has been undertaken by Pigeon Investment Management Ltd to overcome the concerns relating to access and demonstrate the sites deliverability. A summary of the work to date is set out below which demonstrates the site's deliverability.

Indicative layout plan

6.13 An indicative layout plan, drawing number 015 - 015 - 00 has been prepared for the site (see Appendix). This shows how the site could be developed to deliver a range of house types including 18 affordable units. The proposed layout demonstrates that the site can deliver housing which respects the surrounding pattern of development. A strong frontage along high Road will provide a connection between the existing settlement and the group of existing buildings to the west of the site. This will be focused around the new highway access which will create an attractive and framed entrance into the development. The internal layout picks up on pedestrian connectivity through to Mill Close providing some additional frontage plots in the eastern corner of the site.

Elsewhere the proposed dwellings and street layout seeks to extend the established pattern of buildings along the site boundaries. Open space and gardens are provided along the north-eastern boundary in order to respect the presence of the allotment gardens. A large area of open space to serve the development (and the existing village) is proposed to the north which will provide a sensitive edge and integration with the open farm land beyond.

6.14 The layout demonstrates that an appropriate density of development can be provided along with a range of house types. The proposed layout can also meet garden space requirements and parking provision while respecting the amenities of adjoining residential properties.

Affordable Housing

6.15 The indicative layout shows the site could include 18 affordable units, including a variety of house types and sizes to meet local need. This will be a significant local benefit.

Heritage Assessment

6.16 The site does not lie with or adjacent to a conservation area and there are no Listed Buildings or other Heritage Assets on or nearby.

6.17 A desk-based assessment of archaeological significance was undertaken in November 2015. This report concludes that there is no evidence that proposed development will have any impact on the significance or setting of designated heritage assets of archaeological interest. It suggests that development could have an impact on the significance of undesignated heritage assets indicated by crop marks but that their significance is unlikely to be sufficient to preclude development and impact on them may be mitigated by the formulation of an appropriate archaeological strategy.

Flood Risk

6.18 The entire site is located within Flood Zone1; land assessed as having a low probability of flooding from fluvial sources. In addition, the site is not identified to be at risk from surface water or reservoir flooding, according to the Environment Agencies Flood Maps for Planning.

6.19 The development will not increase the risk of flooding post development as attenuation measures will be provided on site as part of the proposal to accommodate surface water run-off generated from the critical duration 1 in 100 year event, including an allowance for climate change.

Drainage Strategy

6.20 A preliminary drainage strategy has been prepared for the site which concludes that foul water from the development will be able to flow via gravity to the existing Anglia water sewer located in the High Road.
6.21 In respect of surface water drainage the underlying geology is expected to be of high permeability which will allow surface water run-off to discharge via infiltration. It identifies that an infiltration basin can be provided within the public open space to accommodate surface water run-off from the proposed highway. The surface water from roofs can be discharged via soakaways with permeable paving included to drain the private access roads, parking areas and driveways.

Landscape and Visual Assessment

6.22 A landscape and visual assessment of the site has been carried out and it concludes that there is capacity within the landscape to absorb change.

6.23 It suggest that given the nature, character and visual quality of the existing settlement edge and the poor quality of the existing edges of the site, it has a High Capacity to accommodate change, and the potential to enhance the settlement edge.

6.24 As such there are few constraints or issues in landscape and visual terms that would prevent the site being considered for development.

Preliminary Ecological Appraisal

6.25 A preliminary ecological appraisal has been carried out for the site. Ten habitats were identified during the Extended Phase 1 Habitat Survey including scattered broadleaved and coniferous trees, scattered scrub, poor semi-improved grassland, scattered bracken, tall ruderal, arable, introduced shrub, and species-poor intact and defunct hedgerows. In addition the field margins on-site provide opportunity for common invertebrates, reptiles, birds, and foraging / commuting bats. The report makes a series of recommendations in respect of mitigation measures and good practice during development however, no Phase 2 survey work was required. It is clear that there are no ecological barriers to the

sites development.

C - 7310 - 3949 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7310 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

Transport Report

6.26 A transport report has been prepared for the site which concludes that the proposed development can be served by an acceptable access to the highway network. The report confirms that the site is located in a sustainable location with bus stops on the boundary providing frequent services and footway connections to local facilities.

6.27 A new access can be provided onto High Road which complies with highway standards and provides adequate visibility and capacity. The existing local infrastructure can support the additional traffic generated, including through the use of more sustainable modes of transport as alternatives to the private motor car, such as cycling, walking and public transport.

6.28 The transport report confirms that access can be provided directly onto High Road and that it will not be necessary to take access via Mill Close as assumed in the assessment of the SHLAA 2014 (site 383a). This therefore overcomes the key reason for the site being discounted due to concerns regarding vehicle access.

7 CONCLUSION

7.1 As set out above and referred to elsewhere in this consultation response Alternative Option Site 3022a is available and deliverable. There are no obstacles to its development and clearly proposals are at an advanced state. The indicative layout confirms that a policy compliant scheme can be delivered which will include market and affordable housing, a large area of open space and improved connectivity.

7.2 As indicated in the landscape and visual assessment, the proposed development will be an attractive addition to the settlement, improving the quality of existing north western edges of the village.

7.3 The site is not in a flood risk area and can be suitably served by both foul and surface water drainage.

7.4 Development of the site will have no impact on designated heritage assets and any impact on undesignated assets can be mitigated. Additionally, there are no ecological barriers to the sites development.

7.5 The site is in a sustainable location with good access to local services and facilities. A new point of vehicle access, which accords with adopted standards, can be provided to High Road overcoming the original reason for the site being discounted in the SHLAA 2014 (site 383a).

7.6 Policy FPP1 of the Felixstowe Peninsular AAP is still working to the Core Strategy target of 7,900 rather than the 11,000 OE figure or an up to date objectively assessed need, as required by Core Strategy Policy SP2. In addition, the current five year supply is not based on an up to date objectively assessed need. It is therefore contended, that the Felixstowe Peninsular AAP should take the opportunity to allocate more sustainable sites that can be delivered in order to meet the requirement of the NPPF to "significantly boost its supply of housing" and assist in the maintenance of a five year supply of housing land.

These sites should allow for variety in house types and tenures to come forward to meet local needs and ensure choice and competition in the market for land (NPPF paragraph 47).

7.7 In conclusion, it is clear that Alternative Option Site 3022a has many advantages over some of the preferred allocation sites and there are no obstacles to it coming forward for development. It is in a sustainable location and could readily deliver much needed housing, including affordable housing, a significant social benefit, with very limited environmental consequences. It does not represent a risk of coalescence and is a natural and logical extension of the settlement with clear and defensible boundaries.

7.8 For the reasons set out above it is clear that Alternative Option Site 3022a should be included as a preferred allocation in the Felixstowe Peninsular AAP.

APPENDICES [see attached documents]

See Attachments to Representation Submission for following documents:

- A. Location Plan
- B. Indicative Layout Plan
- C. Preliminary Drainage Appraisal (October 2015)
- D. Desk-based Archaeological Assessment
- E. Landscape and Visual Assessment (November 2015)
- F. Preliminary Ecological Appraisal
- G. Transport Report
- H. Phase 1 Contamination Report

Summary:

Land is identified on Trimley High Road for residential development with on site open space to provide a village green. (Indicative Capacity 70 dwellings)

The site could come forward with access on to the High Street. The Public House is a listed building and therefore development proposals will have to be sensitive to its status which may limit capacity.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

Appendix H - Phase 1 Contamination Report (Pt1).pdf

Appendix E - FR 3659 Figure 3 Landscape and Heritage Designations and Public Rights of Way.pdf

Appendix E - FR 3659 Figure 2 Statutory Designations(1).pdf

Appendix E - FR 3659 Figure 1 Site Plan with Photo Locations(1).pdf

C - 7310 - 3949 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7310 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

Appendix D - Trimley St Martin Desk Based Archaeological Assessment.pdf

Appendix H - Phase 1 Contamination Report (Pt2).pdf

Appendix F - preliminary Ecology Appraisal Trimley.PDF

Appendix E - FR 3659 Figure 4 Landscape Charcter Assessment.pdf

Appendix E - Landscape and Visual Assessment Summary November 2015.pdf

Appendix G - Transport Statement (November 2015).pdf

Appendix C - Prelimiary Drainage Appriasal Nov 15 trimley.pdf

Appendix B - Indicative Layout Plan (015-015-002).pdf

Appendix A - Location Plan Trimley.pdf

Appendix E - FR 3659 Figure 5 Photosheets_LR.pdf

Appendix C - Prelimiary Drainage Appriasal Oct 15 trimley.pdf

C - 7333 - 348 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7333 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

Respondent: Trinity College Cambridge [348] Agent: Bidwells (Mr Darren Cogman) [1138]

Full Text:

I write in response to the Preferred Options consultation, submitting representations on behalf of my client, Trinity College, Cambridge, in respect of the draft allocation of Preferred Policy FPP6 - Land opposite Hand in Hand Public House, Trimley St. Martin.

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St. Martin

Trinity College supports the proposed allocation of the above site for residential development.

The allocation of the site will make a meaningful contribution towards the pressing need for new housing across the Peninsula allied with the Council's commitment to deliver a minimum of 1,760 new dwellings in Felixstowe, Walton and the Trimley villages during the plan period (2010 to 2027) of the adopted Core

The Core Strategy states that Felixstowe, Walton and the Trimley villages is by far the largest town within the District and includes the Port of Felixstowe, a strategic employment site, of both regional and national significance. Pertinently, it also acknowledges that the growth of jobs in Felixstowe, driven by expansion of

the Port, means that employment is now out of balance with the availability of housing. As a result, more of the new jobs are being taken up by people who are not able to find a home in Felixstowe, even if they would like one. This had led to an unsustainable increase in commuting from other towns on a daily basis. In

addition, the population in the area is increasing at the same time as average house-hold sizes are falling, further increasing the need for housing. The number and type of new homes provided in recent years has not matched this increase in demand.

The importance of boosting housing supply in Felixstowe is demonstrated by the Council's commitment (as required by the Inspector who examined the Core Strategy) to pursue an early review of the Core Strategy's strategic policies (amongst them a minimum housing requirement of 7,900 dwellings) by 2015 to address objectively assessed housing needs (Policy SP2 - Housing Numbers and Distribution). As part of the evidence base to inform the Core Strategy, Oxford Economics were commissioned (2010) to determine housing need for the District, which was established to be 11,000 dwellings at that time. It is understood that

evidence gathering during 2015 indicates that the current full, objectively assessed district wide housing need could be higher still.

As such, current housing need is higher than the levels of growth currently being planned for, and more sites are likely to be required to come forward on the peninsular in the medium term, over and above those proposed for allocation via the AAP. It is, therefore, critical to make the best use of land for housing and prioritise the delivery of residential development.

The host site is one of a number identified by the Council as being suitable for residential development in its Strategic Housing Land Availability Assessment (SHLAA, 2014). My client supports the SHLAA's conclusion that the site is deliverable, being suitable, available and achievable for development within 5 years.

The suitability of the site for housing is reaffirmed by its sustainability. The Interim Sustainability Appraisal supporting the AAP consultation identifies that it scores well when considered against its social, environmental and economic effects. For example:

- The site is located close to a range of local services, including the Trimley Sports and Social Club, Memorial Hall, Hand in Hand Public House, and Trimley Methodist Church.
- It is adjacent to bus routes (High Road) connecting the village with Felixstowe and Ipswich.
- The site will assist in the Core Strategy's aim to reduce and reverse the unsustainable patterns of incommuting to Felixstowe (the Port and its other employment areas).
- On site open space to provide a village green to the High Street frontage to provide a new open space for the village (community benefits), and reduce the impact on the setting of the Hand in Hand Public House.

In essence, the site is ideally suited for residential development and its allocation in the AAP is entirely consistent with the Core Strategy's short to medium term objectives to deliver organic and evolutionary growth over a mixture of sites immediately abutting existing built up areas.

Scale of Residential Development Required

The AAP "expects" a minimum of 70 dwellings to be delivered on the site, well above the SHLAA's estimate of its maximum capacity of 54 dwellings. My client acknowledges this target and is bringing forward a masterplan as part of an outline planning application that will seek to deliver it.

Nevertheless, it is of paramount importance to ensure the delivery of high quality living environments and, ultimately, sustainable communities. It will be necessary to take other constraints into account, such as the need to respect the setting of the Listed Public House and the desire to provide a suitably sized village green to act as a focus for Trimley St. Martin

These constraints will impinge the quantum of development that can be realistically achieved, although we remain convinced that the minimum amount of dwellings expected can be satisfactorily achieved.

Other Site Requirements

My client has particular concerns about the list of other requirements contained in draft policy FPP6 and its supporting text that proposals for the site are expected to have regard for alongside the need to deliver a minimum of 70 new homes. These include a village green, together with a high percentage of bungalows/low rise units to reflect the character of the surrounding area.

Paragraph 173 of the National Planning Policy Framework (the Framework) makes clear that pursuing sustainable development requires careful attention to viability and costs in plan making and decision taking.

C - 7333 - 348 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7333 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

It confirms that:

"sites identified in the Plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions and other requirements should, when taking

account of the normal cost of development and mitigation, provide competitive returns to a willing landowner and willing developer to enable development to be deliverable."

The Council must be satisfied that the policy burdens it is seeking to impose on the site, in addition to the CIL charge that will apply, will not threaten its viability or deliverability. We have not seen any evidence to suggest that this has been fully taken into account.

Most of Felixstowe, Walton and the Trimleys are in an area assessed as being of "Low" land value in the viability evidence prepared to support its Community Infrastructure Levy (CIL) examination. This makes sites particularly sensitive to any excessive policy burdens. Whilst willing to provide a village green given the

minimum housing requirement the additional requirement to provide a high percentage of bungalows is simply incompatible with achieving at least 70 dwellings across the site, and providing 'competitive returns to a willing landowner and willing developer to enable development to be deliverable'.

Taking this into account, there is a need to be realistic about what the site can deliver and to prioritise the most important objectives. We strongly contend that making the best use of the site to deliver housing and its supporting infrastructure should be the priority as a consequence of the Core Strategy's commitment to

deliver a minimum of 1,760 dwellings in Felixstowe before 2027 and the likelihood of an increased requirement within the same timescale arising from its forthcoming early review (understood to commence with a 'Issues and Options' consultation in October 2016). Seeking to deliver a range of other requirements

will only harm viability and, as a minimum, the amount of affordable housing that can be supported alongside CIL and other development costs.

Requirement for a High Percentage of Bungalow/Low Rise Units

My client has no objection to bringing forward proposals which provide for a good mix of housing, including dwellings suitable for the elderly, but does object to the prescriptive requirement to provide a 'high percentage of bungalow/low rise units to reflect character of the surrounding area'.

It is unclear what evidence of need this requirement is based on because little justification is provided in the draft AAP. For example, it should be noted that the High Street frontage adjacent the site actually consists predominantly of Victorian and more recent two storey houses.

More importantly, the site does not have capacity (relatively limited site area) to support the development of land hungry bungalow dwellings when providing a meaningful village green alongside a minimum of 70 new dwellings. The requirement is not deliverable, and therefore unsound. The policy wording should be amended to remove the reference towards the provision of a high percentage of bungalow/low rise units and should instead focus on the delivery of a high quality residential development.

Rather than prescriptive, and unachievable building forms given other competing requirements, there are other measures open to ensure that homes are accessible and inclusive, for example the concept of 'Lifetime Homes', that can provide sufficient flexibility and adaptability to support the changing needs of

individuals and families at different stages of life. Moreover, taking account of the commitments set out in the Core Strategy, the delivery of housing suitable for all members of the community should be the priority for this site.

Requirement for an Air Quality Assessment

My client acknowledges that an Air Quality Assessment will be required to support a planning application for residential development, as we note is being required for all Preferred Option residential sites within the Trimley villages.

Conclusion

In summary, subject to the concerns outlined, my client is supportive of the proposed allocation of the site to provide new housing to assist in meeting the minimum Core Strategy housing requirements, and helping reverse unsustainable patterns of in-commuting to the Port of Felixstowe and other employment areas.

We trust that the above representations are of assistance and look forward to the Pre-Submission (soundness) consultation timetabled to commence in February 2016. In the interim, I would of course be pleased to discuss these specific representations or any other matters in respect of this site at your earliest convenience.

Summary:

The suitability of the site for housing is reaffirmed by its sustainability. The Interim Sustainability Appraisal supporting the AAP consultation identifies that it scores well when considered against its social, environmental and economic effects. The site is located close to a range of local services & adjacent to bus routes.

Subject to the concerns outlined, my client is supportive of the proposed allocation of the site to provide new housing to assist in meeting the minimum Core Strategy housing requirements, and helping reverse unsustainable patterns of incommuting to the Port of Felixstowe and other employment areas.

Change to Plan

It is not specified what 'nationally published standards' the Council is referring to. The policy is vague and moreover it is unnecessary, since any standards set out in national planning policy do not need repeating in the AAP. My client objects to inclusion of this section of the policy because it is unclear, unnecessary and unsound. We would encourage the Council to remove it altogether. Requirements in respect of open and play space can be secured by national planning policy, the Core Strategy and the SPG.

C - 7333 - 348 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7333 Comment

Housing Preferred Policy FPP6: Land opposite Hand in Hand

Public House, Trimley St Martin

Appear at exam? Legal? Sound? **Duty to Cooperate? Soundness Tests** Not Specified Not Specified Not Specified Not Specified None

C - 7384 - 3952 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7384 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

Respondent: Anglian Water (Mr Stewart Patience) [3952] Agent: N/A

Full Text:

Thank you for the opportunity to comment on the Site Allocations and Area Policies Preferred Options Document and Felixstowe Peninsula Area Action Plan. Please find enclosed comments on behalf of Anglian Water.

Site Allocations and Area Specific Policies Preferred Options Consultation Document

Policy SSP3: Land rear of Rose Hill, Saxmundham Road Aldeburgh

Anglian Water has no objection to the proposed allocation of this site for open market housing and a care home.

Paragraph 2.28 (page 30)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.28 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP4: Land at Mill Road Badingham

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.32 (page 32)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.32 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP5: Land Adjacent to Corner Cottages, Main Road, Benhall

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP6: Land south of Brook Cottage, Benhall

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.35 (page 34)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.35 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP7: Land opposite Townsfield Cottages, Dennington

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.40 (page 37)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.40 should be amended to refer to the management of surface water run off in

C - 7384 - 3952 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7384 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

accordance with the surface water management hierarchy.

Policy SSP8: Land south of Ambleside, Main Road, Kelsale cum Carlton

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.46

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.46 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP9: Land north of Mill Close, Orford

It is expected that there may be a need for improvements to the sewerage treatment capacity to enable the development of this site.

Policy SSP10: Land west of Garden Square Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP10:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP11: Land rear of 3 -33 Suffolk Drive, Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP11:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP12: Land north-east of Street Farm

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP12:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP13: Land fronting Old Homes Road, Thorpeness

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP13:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP14: Land south of Lower Road Westerfield.

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP15: Land at Old Station Works, Main Road Westerfield

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP15:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP16: Land at Street Farm, Witnesham (Bridge)

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP17: Land south of the primary school, Witnesham

Anglian Water has no objection to the proposed allocation of this site for residential development.

C - 7384 - 3952 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7384 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

Policy SSP18: Ransomes, Nacton Heath

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP13:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP19: Land at Silverlace Green(former airfield) Parham

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required.

Therefore it is recommended that these issues are investigated further and Policy SSP19 is amended accordingly.

Policy SSP20: former airfield Parham

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required.

Therefore it is recommended that these issues are investigated further and Policy SSP20 is amended accordingly.

Policy SSP21: former airfield Debach

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required. Therefore it is recommended that these issues are investigated further and Policy SSP21 is amended accordingly.

Policy SSP22: Bentwaters Park, Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP22:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP23: Carlton Park, Main Road, Kelsale cum Carlton

Anglian Water has no objection to the proposed allocation of this site for employment development.

Policy SSP24: Levington Park, Levington

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP24:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP25: Riverside Industrial Estate, Border Cot Lane, Wickham Market

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP25:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP31: Snape Maltings

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site for arts, recreation and tourism related development. It is therefore suggested that the following text should be include in Policy SSP25:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Felixstowe Peninsula Area Action Plan Preferred Options Consultation document

Policy FPP3:Land at Sea Road, Felixstowe

C - 7384 - 3952 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7384 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP4: Land north of Walton High Street, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP5: Land north of Conway Close, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is therefore suggested that the following text should be include in Policy FPP6:

'Improving the capacity of the foul sewerage network'

Policy FPP7: Land off Howlett Way, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is therefore suggested that the following text should be include in Policy FPP7:

'Improving the capacity of the foul sewerage network'

Policy FPP8: Land off Thurmans Lane, Trimley St Mary

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP8:

'Improving the capacity of the foul sewerage network'

Policy FPP9: Land at Bucklesham Road, Kirton

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Policy FPP9 refers to 'reinforcement of connections'

The term reinforcements is normally used in the context of water mains and not foul sewers when referring to improvements within the network.

It is therefore suggested that the following text should be include in Policy FPP9:

'Improving the capacity of the foul sewerage network through reinforcement of connections by making necessary improvements to ensure that capacity can be made available'

Policy FPP10: Port of Felixstowe

It is noted that it proposed to allocate land at the Port of Felixstowe for strategic employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Policy FPP11: Land at Bridge Road, Felixstowe

It is noted that it proposed to allocate land at Bridge Road for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Policy FPP12: Land at Carr Road/Langer Road, Felixstowe

It is noted that it proposed to allocate land Carr Road/Langer Road for employment uses.

C - 7384 - 3952 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7384 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP12:

'Improving the capacity of the foul sewerage network'

Policy FPP13: Land at Haven Exchange, Felixstowe

It is noted that it proposed to allocate land at Haven Exchange for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP13:

'Improving the capacity of the foul sewerage network'

Summary: It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this

site.

Change to Plan Therefore it is therefore suggested that the following text should be include in Policy FPP6:

'Improving the capacity of the foul sewerage network'

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7393 - 3883 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7393 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House. Trimley St Martin

Respondent: mr r modrzynski [3883] Agent: N/A

Full Text:

I would like to make the following comments particularly regarding the Sustainability Appraisal (SA) for the developments in Trimley St Martin (TStM) in particular but numbers of the comments also apply to sections throughout the plan for the peninsula.

The plan has many uses of the word 'likely', in my opinion and I believe in the opinion of the 'reasonable person, disingenuously.

For example to REDUCE greenhouse gases, REDUCE waste, REDUCE effects of traffic, INCREASE air quality. The process of building, occupying and maintaining these houses and sites can only INCREASE greenhouse gases, waste generation, the amount of traffic as well as many of the other factors and DECREASE air quality and wildlife habitats. The word 'likely' is completely misleading.

I would suggest that there must be some quantitative data available to demonstrate, per house occupant and/or house the lifetime environmental effects in terms of greenhouse gases, air pollution, water and waste usage etc and that this information should have been included in the plan. This would allow a quantitative assessment and avoid such nebulous terms as 'likely'.

I find the criteria on page 15 FPAAP difficult to correlate with the scoring system guidance given on pages 10 - 12. The scoring often seems to result in a favourable outcome whereas any reasonable person could not fail to see some of the glaringly obvious and significant negative effects. Many of these scores seem to have no factual bases with little or no factual information to substantiate them, see following comments.

In terms of the scoring, the criteria look to positive or negative changes. In doing so I am struggling to understand the purpose of a 0 score, it has little basis although I understand what it is trying to show. If one had a neutral question i.e. what is the affect on air quality it could improve, reduce or stay the same. One cannot have a neutral effect on a positive or negatively based question. I wrote assessments for many years.

From page 36 onwards:

Scores on SA given in brackets () where appropriate.

1. (0) IMPROVE health, local GPs are operating with reduced staff and certainly the Grove surgery has been operating phone appointments for some months due to lack of resources. Increasing population numbers cannot possibly increase without large scale investment and even more significantly the ability to recruit and retain staff to cope; this score and must surely be -ve

TStM primary school as I understand it, would not have anywhere near the capacity to deal with an approximate doubling of the village population. In addition it is stated that developments are in walking distance of the school. In my experience the road outside the school becomes lined with dozens of cars which makes for traffic jams if one is unfortunate to have to go that direction at peak times. Evidence would show that many people use there cars to access the school, usually or depending on the weather, regardless of distance which may be due to a number of factors. The considerable distance from the Howlett Way development, with no access along the main road, would clearly give rise to additional traffic. There would also be a need to cross the now much busier Howlett Way road to use existing footpaths, an even longer walk. I therefore see a considerable increase in road traffic along minor roads increasing negative impacts and increasing the potential for accidents.

This also negatively affects air quality and quality of life.

- - ve

- 2. Education and skills. Again I see no justification for this being improved but with sufficient resources it could be maintained. One may educate a larger number to the same level but without extra resources/new training systems no improvement would seem possible. With numbers of 6th form age people using the facilities in Ipswich, which also has vocational training, one would expect the usage of private and public transport to increase proportionately.
- 3. Reduce crime and ASB. The doubling in size of the village with current and potentially falling Police numbers as well as unknowns regarding populations cannot give a reduction. I see no justification regarding how a reduction may be achieved and in fact reduced enforcement (possibly per capita) and a 'change' in the character of the village I would suggest an increase in total negative incidents, even if the per capita rate is maintained.
- 4. Reduce poverty, no effect
- 5. Improve access to key services. As it is stated no new key services will be created this should be -ve
- 6. Employment, with the small number of temporary jobs which 'may' be created it hardly constitutes much of a benefit to the community, certainly not in comparison to the detriments already noted and those yet to be. Large builders tend to recruit form a large area and keep certain of their own people, I would expect to see large numbers travelling considerable distances from perhaps a 30 mile radius to work on the site. Not a great benefit to the local workers and lots of car and van journeys contributing to pollution.
- 7. Meet housing requirement for all. Given increasing house prices and ever reducing numbers of people being able to afford even starter homes I doubt that any housing built on these sites will assist this aim.

C - 7393 - 3883 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7393 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

There also seems to be considerable deviation reported on the actual delivery of affordable housing highlighting a significant difference between planned and committed numbers and the number built. If the aim is not able to guarantee delivery what is the point of the aim. We may just end up with a larger number of 3, 4 and 5 bedroom houses to satisfy the better off and private landlords.

This also reflects on the employment criteria but will be mentioned here. There are no signs of significant growth in the Felixstowe area to justify the extent of extra housebuilding and influx of potential labour. There are several mentions of the Port but the reliance on one facility to drive employment and economic growth is an extremely risky one as well as it being dubious as to whether it will create large numbers of jobs.

One would therefore have to suggest that those that would occupy the homes planned would be travelling to other places i.e. Ipswich and beyond and possibly some using them as second homes.

The large employers i.e. BT are moving more jobs offshore and Felixstowe etc is outside the travel limits for Sizewell B (and C) so there will be no influence there.

In my opinion a great deal could be done by utilising economic and other factors to ensure SC is not just a place for the protected, nice areas to be preserved and to be used as second homes with limited positive economic benefit and the exclusion of those that want to live and work here full time.

Reducing vacant properties and enabling them to be utilised by full time inhabitants should run alongside further housing number growth.

8. (++) Improve quality of where people live and community participation. Quite frankly I am baffled by the justification for the ++ score based on the comments given.

Many acres of productive farmland will be dug up and concreted to create a village ~ twice the size which will look like a large housing estate from the A14 roundabout to Felixstowe. The separation of the two villages with demarcation made by a large visible arable area makes the village look like a village. One then sees a variety of housing before moving to following communities.

This field area a pleasure to see and be able to access, there is no possible justification of a ++ score that can be achieved by building on it.

Improvements of Rights of Way is a trivial task which only maintains what exists, in a much more suitable and fitting surrounding. If the RoW were maintained it would make this point irrelevant, it would just make it fit for purpose as it should be currently anyway. As it is Council budgets are reducing and less and less maintenance is being carried out, as such any improvement would seem somewhat temporary and irrelevant.

The plan to introduce a 'green area' to compensate for the loss of acres of greenfield is frankly preposterous, it is window dressing and irrelevant compared to the detriment.

This should be a - - ve score

9.

- 10. Air quality. This is not likely to remain stable it can only, with the building and occupation process cause it to decline.
- 11. ok
- 12. ok
- 13. Once again it is not 'likely' to increase waste, it WILL increase waste - ve
- 14. Reduce effects of traffic.

In general the building of the number of houses proposed in the Felixstowe - Trimley corridor will lead to thousands of extra traffic movements per day. Expanding a village to double its size will generate a vast amount of extra traffic from domestic usage, throughout the day, evening and night. There is also of course extra public transport assuming that it runs at times which correspond to when people wish to travel and the destinations they wish to reach. Deliveries and services vehicles etc etc.

I see that public transport is referred to several times however these services are well occupied at peak times and running extra together with traffic movements from those going to other places or that need different timings, mobility etc would lead to great difficulties on the High Roads through the villages. The peak times could have to deal with several hundred people going through the villages in either direction, together with extra public transport. The High Roads already have great difficulty due to the school collection at peak times and road side parking. This will be a terrible journey. Not to mention those on the route will be subjected to a great deal of extra traffic noise and pollution. No amount of tinkering with traffic flows is going to alleviate the problems, there is no room for road widening along enough of the route.

- 15. Reduce greenhouse gases. Energy consumption per capita may reduce due to improved building standards however TOTAL emissions will be increased significantly for the lifetime of the housing stock and the detriment of the environment. -- ve
- 16. Reduce flooding. Although a low flood risk zone reduction in absorption capability by building over greenfield is a substantial reduction in the sites capacity. No amount of mitigation will significantly change the negative effects. -/-- ve

C - 7393 - 3883 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7393 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House. Trimley St Martin

17. Wildlife conserve and ENHANCE. Again the removal of natural environment is a destruction of habitat which is totally out of keeping with the village aspect and location. -- ve

18/19. I am struggling to think of how the aspects of listed buildings will be enhanced by any sort of modern building, certainly of the type that will almost certainly be built on these sites.

The filling in of the visible gap between the Trimleys, that visible from Howlett Way is a positive detriment to the character of the villages. It turns two habitations into, at least, the appearance of one sprawling mass. A small increase in numbers perhaps in line with the proposals, current Mushroom farm development and opposite the Hand in Hand may enable much of the character to be maintained. The Larger Howlett Way development would not only be grossly more than the expected housing need but also ruin the village by ~ doubling its size.

The remaining points are already covered but to reiterate briefly, I fail to see how more houses will regenerate the town centre, extra people will do as the current ones do. So much trade will take place out of centre although somewhat of an increase may be expected.

I fail to see any justification for the ++ score in terms of employment, it appears a hopeful but baseless assessment.

In summary

Although I acknowledge all areas in the District should do their bit to enable population growth, from whichever source, it should take account of the aging population who seem to favour the Felixstowe area and build, in part, suitable housing to accommodate them.

Filling in the area off Howlett Way is the worst possible solution for numerous reasons as detailed. Smaller scale development would seem suitable and the Hand in Hand site would seem to have less downsides and helping to balance occupation of the village both sides of the High Road.

I would also suggest some the triangular section of ground to the NE going to the A14 sliproad, near the allotments might be suitable for small scale development which would be more in-keeping with the character and distinctiveness of the village.

I would hope that the scale of the negative impacts would outweigh comprehensively the positives; let the villages retain some of their heritage and allow us to remain separate and distinctive.

Summary:

Smaller scale development would seem suitable and the Hand in Hand site would seem to have less downsides and helping to balance occupation of the village both sides of the High Road.

I would hope that the scale of the negative impacts would outweigh comprehensively the positives; let the villages retain some of their heritage and allow us to remain separate and distinctive.

Change to Plan

I would also suggest some the triangular section of ground to the NE going to the A14 sliproad, near the allotments might be suitable for small scale development which would be more in-keeping with the character and distinctiveness of the village.

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

O - 7520 - 4021 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7520 Object

Housing Preferred Policy FPP6: Land opposite Hand in Hand

Public House, Trimley St Martin

Respondent: E & P Rastrick [4021] Agent: N/A

Full Text: We regard this an appropriate development because:

- access to the High Road will be significantly increased and the infrastructure traffic will be placed into on overstretched and hazard situation particularly if other areas in the Walton / Trimley area will have increased traffic.

- schools altho short term beneficiaries, will not receive sustained long term funding which will be detrimental in the long

term

- GPs - not enough for existing community

- Why create an artificial village green when there is a good space immediately in front of the Hand in Hand? The land is

prime agricultural land

- the increased traffic through the villages will affect those trying to exit from Mill Lane.

- Increase in traffic detrimental to the well being of those people who live along the High Road

Summary: - Why create an artificial village green when there is a good space immediately in front of the Hand in Hand? The land is

prime agricultural land

- the increased traffic through the villages will affect those trying to exit from Mill Lane.

- Increase in traffic detrimental to the well being of those people who live along the High Road

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7533 - 4039 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7533 Object

Housing Preferred Policy FPP6: Land opposite Hand in Hand

Public House, Trimley St Martin

Respondent: Mr Nigel Barnes [4039] Agent: N/A

Full Text: FPP6: Land opposite Hand in Hand Trimley St Martin SHLAA: 451b

The following comments are against the proposed housing on this site which is immediately opposite my house (344 High Road).

- Loss of farmland as noted (SA11)

- Loss of open space and widely used dog walking space (-ve)

- Reduction of air quality to neighbouring homes (SA10) (-ve)

- Increase traffic along High Road - already reduced to a single track due to parked cars. Our driveway is already used as a parking space - leading to noise and disturbance which would increase (SA14 -ve)

- Proposed road access (opposite 348) will create a dangerous staggered T junction with Mill Lane - already highlighted as dangerous for the pre-school children by the Council (SA14 & SA22 -ve)

- High Road is already used as the primary route to Ipswich over Howlett Way contrary to sign-posting at the Howlett Way / High Road roundabout and struggles (SA22 -ve)

Howlett Way is a higher capacity route that is underused (SA22 -ve)

- Loss of countryside views from our home and loss of property value (SA8 -ve)

- 'Village green' area opposite our home will increase noise and disturbance from play area and youth gatherings (SA8 - ve) (SA19 -ve)

- Site does nothing to increase skills and education so why is SA2 +ve? It shouldn't be

- Rainwater run-off is already an issue for our homes and would increase with less soak away from field (SA16 -ve)

- Site cannot reduce greenhouse emissions (SA15 -ve) - additional building cannot do so

- Reduction of air quality as prevailing wind is over this site to existing housing (SA10 -ve)

Overall there are significant Negative aspects.

Summary: -Loss of countryside views from our home and loss of property value (SA8 -ve)

-'Village green' will increase noise and disturbance from play area and youth gatherings (SA8 -ve) (SA19 -ve)

-Site does nothing to increase skills and education so why is SA2 +ve?

-Rainwater run-off is already an issue for our homes and would increase with less soak away from field (SA16 -ve)

-Site cannot reduce greenhouse emissions (SA15 -ve) - additional building cannot do so

-Reduction of air quality as prevailing wind is over this site to existing housing (SA10 -ve)

Overall there are significant Negative aspects.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7535 - 4041 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7535 Object

Housing Preferred Policy FPP6: Land opposite Hand in Hand

Public House, Trimley St Martin

Respondent: N J Murdoch-Mayes [4041] Agent: N/A

Full Text: The increased number of cars etc is bound to have a detrimental effect. Increased traffic will make difficulties for

residents in side roads to exist to main High Road, also difficulties for pedestrians crossing, reminiscent of the situation before the by-pass was built. A village green imposed upon the landscape is a doubtful asset when we have a wide

space of natural beauty. The charm of a village green is its history and surroundings, part of our heritage.

As regard to the one-off payment to Education for each property built, this will be insufficient to develop schools as

needed. Other resources are lacking, i.e. chemist, doctors surgery, school places.

Summary: The increased number of cars etc is bound to have a detrimental effect. Increased traffic will make difficulties for

residents in side roads to exist to main High Road, also difficulties for pedestrians crossing, reminiscent of the situation before the by-pass was built. A village green imposed upon the landscape is a doubtful asset when we have a wide

space of natural beauty. The charm of a village green is its history and surroundings, part of our heritage.

As regard to the one-off payment to Education for each property built, this will be insufficient to develop schools as

needed.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7539 - 4044 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7539 Object

Housing Preferred Policy FPP6: Land opposite Hand in Hand

Public House, Trimley St Martin

Respondent: S A Osborne [4044] Agent: N/A

Full Text: Too many houses already in Trimley St Martin, how will the services etc cope. You are ruining our village.

FPP6

Trimley St Martin - unfairly treated - our village is turning into a town. No shops for the people can't drive + elderly.

FPP7

Howlett's Way. I hope the traffic from that site will use A14 and not the High Road which is already congested before the

new houses being built.

Why wasn't Mushroom From houses already being built not put on map.

Accident waiting to happen coming out of Mill Lane Trimley onto the High Road, too many cars parking for the 'play

school' etc.

When there is a accident / incident on the A14, the lorries are sent through our village. It's grid lock and cutting up the

road and verges and weight limit on the bridge Trimley St Mary stop the lorries now.

Why not start another village the other side of the A14, that would have been even more sensible.

All the different views won't make any difference, I bet it is all done and dusted!!!

Summary: Too many houses already in Trimley St Martin, how will the services etc cope. You are ruining our village. Trimley St

Martin - unfairly treated - our village is turning into a town. No shops for the people can't drive + elderly.

When there is a accident / incident on the A14, it is grid lock.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7541 - 1438 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7541 Object

Housing Preferred Policy FPP6: Land opposite Hand in Hand

Public House, Trimley St Martin

Respondent: R F Osborne [1438] N/A Agent:

Full Text: Mushroom development not on map?

Access to High Road will put extra pressure on dangerous stretch of road totally unsuitable.

FPP7

Howlett Way only suitable if traffic does not add to High Rd.

FPP8

Again more congestion onto High Road which is already congested.

General observation

Trimley has had it's share of building over the years our Trimley has been treated unfairly the best solution would be to use land on the left of A14 between Dock Spur and Beatrice Avenue building complete new village. Too much emphasis on building on Trinity land! Band heavy lorries using High Road when trouble occurs on A14. Not at all happy.

Summary: Mushroom development not on map?

Access to High Road will put extra pressure on dangerous stretch of road totally unsuitable.

Trimley has had it's share of building over the years our Trimley has been treated unfairly the best solution would be to use land on the left of A14 between Dock Spur and Beatrice Avenue building complete new village. Too much emphasis on building on Trinity land! Band heavy lorries using High Road when trouble occurs on A14. Not at all happy.

Change to Plan

Sound? **Duty to Cooperate? Soundness Tests** Legal? Appear at exam? Not Specified Not Specified Not Specified Not Specified None

O - 7580 - 3862 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7580 Object

Housing Preferred Policy FPP6: Land opposite Hand in Hand

Public House, Trimley St Martin

Respondent: Ms Tanya Ellingham [3862] Agent: N/A

Full Text: I do not agree with building on farmland/countryside due to the negative environmental impact (& conserving soil)

In particular, relating to the land opposite my house this proposed development will be removing beautiful countryside views and thus significantly reducing our enjoyment of our property as well as negatively impacting the value of our

house.

I have concerns about potential flooding from this development as we already get excess rainwater in our driveway.

The development will also cause increased traffic in an already busy road.

Currently cars park all the way down our road, as we have a driveway, this is used as a stopping/passing place for large

vehicles. This would only get worse, particularly as you are proposing a junction to the High Road nearby.

I also have concerns about the Pre-School children being exposed to increased traffic and a potentially dangerous

unction.

Air quality will be impacted due to more queuing & standing traffic outside our house.

In essence this development will reduce the quality of where we live, increase traffic, reduce air quality, reduce

farmland, remove our countryside views and generally have a negative impact on the enjoyment & value of our property.

Summary: This proposed development will be removing beautiful countryside views and thus significantly reducing our enjoyment of our property as well as negatively impacting the value of our house.

vehicles. This would only get worse, particularly as you are proposing a junction to the High Road nearby.

I have concerns about potential flooding from this development as we already get excess rainwater in our driveway.

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Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7616 - 2581 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7616 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text:

Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

- * FPP4 Walton Field evaluation has identified an Early-Middle Bronze Age funerary landscape across the site, with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.
- * FPP6 Trimley Cropmarks on this site show that there are complex archaeological remains of pits, ditches and a coaxial field system and trackways of possible late prehistoric date (TYN 122). Archaeological remains are therefore known on the site, although they have not been fully characterised.

Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7616 - 2581 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7616 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

Early Education

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The Government has indicated that it will legislate to double the number of hours' free childcare to 30. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

- In the Trimleys, developer contributions have already been secured to help manage the existing deficit in Early Years places and proposals are being drawn up to deliver additional places. Further development of the scale proposed (530 dwellings) will necessitate significant additional provision. Under current statutory arrangements, this would necessitate 53 additional places. When Land North of Walton High Street (400 dwellings) is included, the number of places required under current arrangements would increase to 93.

The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

- Development in the remainder of Felixstowe (150 dwellings North of Conway Close and 40 dwellings at Sea Road) can be managed by expanding existing settings.
- At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

The County Council would appreciate consideration of ways in which this policy could be more supportive of early education in retail centres, as part of a balanced policy which also protects the vitality and viability of retail centres. Policy FPP17 appears to implicitly support early education already, and discussion with the District Council may conclude that this policy is sufficient.

Primary Education

The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7616 - 2581 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7616 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

[see table in attached document]

Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

Grange Primary School can also expand, though this school is also not well related to the proposed allocations or future directions of growth.

Paragraphs 37 and 38 of the National Planning Policy Framework reflect the need to minimise the length of journeys to school and, for major developments, primary schools should be located within walking distance of most properties.

The best long term solution would be to reserve 2.2ha land for a new 315-place primary school and early years setting in a location which is well related to housing growth. This would also enable provision to be made for future growth, with another school capable of expansion.

Options for reserving land for a new primary school include:

- Land within 'Land North of Walton High Street'
- Land within another one of the Trimley sites
- Land in another location in the Trimleys, well related to sustainable travel routes and the new housing.

Secondary and Sixth Form Education

Based on standard pupil multipliers, development of 1,135 dwellings would be expected to generate an additional 204 secondary school pupils and an additional 45 sixth formers.

Felixstowe and the Trimleys are served by Felixstowe Academy. Based on the forecast below, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from the development proposed in this Plan.

[see table in attached document]

All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

Health, Wellbeing and Social Care

A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

C - 7616 - 2581 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7616 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

- * Ferry Road opposite site 502E
- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-

C - 7616 - 2581 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7616 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House. Trimley St Martin

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

* FPP6 - Trimley - Cropmarks on this site show that there are complex archaeological remains of pits, ditches and a coaxial field system and trackways of possible late prehistoric date (TYN 122). Archaeological remains are therefore known on the site, although they have not been fully characterised

Change to Plan

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot Specified

Attachments:

2015-11-23 Felixstowe AAP_SCC Final Response.pdf Kirton Sites SW.pdf Felixstowe Sites SW.pdf Kirton Sites FZ.pdf Felixstowe Sites FZ.pdf

C - 7666 - 2581 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7666 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text:

Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

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Comments are set out below, under service headings.

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Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

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Education

C - 7666 - 2581 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7666 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

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The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

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C - 7666 - 2581 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7666 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

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Options for reserving land for a new primary school include:

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Minerals and Waste Plans

C - 7666 - 2581 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7666 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

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[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

C - 7666 - 2581 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7666 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

Archaeology. For the majority of sites, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies in line with NPPF. Although the significance of other sites and potential for encountering assets that may require preservation in situ is not lessened, sites identified at policies FPPP4 and FPPP6 have particular considerations at this stage.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Kirton Sites FZ.pdf
Felixstowe Sites FZ.pdf
Kirton Sites SW.pdf
2015-11-23 Felixstowe AAP_SCC Final Response.pdf
Felixstowe Sites SW.pdf

C - 7668 - 2581 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7668 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text:

Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

- * FPP4 Walton Field evaluation has identified an Early-Middle Bronze Age funerary landscape across the site, with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.
- * FPP6 Trimley Cropmarks on this site show that there are complex archaeological remains of pits, ditches and a coaxial field system and trackways of possible late prehistoric date (TYN 122). Archaeological remains are therefore known on the site, although they have not been fully characterised.

Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7668 - 2581 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7668 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

Early Education

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The Government has indicated that it will legislate to double the number of hours' free childcare to 30. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

- In the Trimleys, developer contributions have already been secured to help manage the existing deficit in Early Years places and proposals are being drawn up to deliver additional places. Further development of the scale proposed (530 dwellings) will necessitate significant additional provision. Under current statutory arrangements, this would necessitate 53 additional places. When Land North of Walton High Street (400 dwellings) is included, the number of places required under current arrangements would increase to 93.

The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

- Development in the remainder of Felixstowe (150 dwellings North of Conway Close and 40 dwellings at Sea Road) can be managed by expanding existing settings.
- At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

The County Council would appreciate consideration of ways in which this policy could be more supportive of early education in retail centres, as part of a balanced policy which also protects the vitality and viability of retail centres. Policy FPP17 appears to implicitly support early education already, and discussion with the District Council may conclude that this policy is sufficient.

Primary Education

The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7668 - 2581 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7668 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

[see table in attached document]

Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

Grange Primary School can also expand, though this school is also not well related to the proposed allocations or future directions of growth.

Paragraphs 37 and 38 of the National Planning Policy Framework reflect the need to minimise the length of journeys to school and, for major developments, primary schools should be located within walking distance of most properties.

The best long term solution would be to reserve 2.2ha land for a new 315-place primary school and early years setting in a location which is well related to housing growth. This would also enable provision to be made for future growth, with another school capable of expansion.

Options for reserving land for a new primary school include:

- Land within 'Land North of Walton High Street'
- Land within another one of the Trimley sites
- Land in another location in the Trimleys, well related to sustainable travel routes and the new housing.

Secondary and Sixth Form Education

Based on standard pupil multipliers, development of 1,135 dwellings would be expected to generate an additional 204 secondary school pupils and an additional 45 sixth formers.

Felixstowe and the Trimleys are served by Felixstowe Academy. Based on the forecast below, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from the development proposed in this Plan.

[see table in attached document]

All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

Health, Wellbeing and Social Care

A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

C - 7668 - 2581 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7668 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

- * Ferry Road opposite site 502E
- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

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C - 7668 - 2581 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7668 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

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[see attached document fo appendix]

Summary:

Cropmarks on this site show that there are complex archaeological remains of pits, ditches and a coaxial field system and trackways of possible late prehistoric date (TYN 122). Archaeological remains are therefore known on the site, although they have not been fully characterised.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

2015-11-23 Felixstowe AAP_SCC Final Response.pdf Felixstowe Sites SW.pdf Kirton Sites SW.pdf Felixstowe Sites FZ.pdf Kirton Sites FZ.pdf

C - 7682 - 2581 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7682 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text:

Felixstowe Area Action Plan - Preferred Options Consultation

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Suggested Amendments

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Education

C - 7682 - 2581 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7682 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

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The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

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C - 7682 - 2581 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7682 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

[see table in attached document]

Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

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Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

C - 7682 - 2581 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7682 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

- * Ferry Road opposite site 502E
- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-

C - 7682 - 2581 - Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin - None

7682 Comment

Housing

Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

FPP6 Transport Access and Traffic Issues. 70 units. Access acceptable from High Road. Need to consider combined impact with current Mushroom Farm site. Other detailed comments provided under headings Sustainability (public rights of way) and collision history. Further detailed information provided on potential mitigation schemes.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

2015-11-23 Felixstowe AAP_SCC Final Response.pdf Felixstowe Sites SW.pdf Kirton Sites SW.pdf Felixstowe Sites FZ.pdf Kirton Sites FZ.pdf

O - 6977 - 3866 - Sustainability Appraisal Information - None

6977 Object

Housing Sustainability Appraisal Information

Respondent: Mr Steven Hayward [3866] Agent: N/A

Full Text: The current infrastructure is at its limits already. An increased number of houses would have a huge negative on the

area for many reasons, the roads struggle with current levels of use and can become very dangerous at peak times or when the A14 is shut. This development will have an irreversible affect on the environment, local wildlife and

ecosystems. This is highlighted also in the report where it states the site would mean the loss of grade 2 agricultural

land.

There is opportunity locally for people who want to live in a more built up area through both Ipswich and Felixstowe,

adding this number of houses would further reduce the village identity.

Summary: -limited current infrastructure

-irreversible affect on the environment -negative impact on village life

-loss of agricultural land.

Change to Plan I understand the increase in demand for new housing across the Suffolk coastal district however

as can be seen, I clearly object to plans on this site. I believe the negative affects heavily outweigh the positives to

building a development here, another more suitable site can be found across the entire district.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6732 - 3781 - 3.59 - None

6732 Object

Housing 3.59

Respondent: Mr. John Vickers [3781] Agent: N/A

Full Text: From Table FPP1:Housing (page 19), the requirement for Trimley St. Martin is 172 dwellings to 2027. Sites 451b, 451c

& 451d can supply 430 as a minimum. This is 2.5 times the requirement. We also note that in para 3.51, "a larger development (of more than 70 dwellings) would be out of character with the rest of the village." If this is true of site 451b, is it not true also of sites 451c+451d? We consider that at least 360 dwellings on sites 451c+451d to be

excessive. Please see attached file.

Summary: From Table FPP1:Housing (page 19), the requirement for Trimley St. Martin is 172 dwellings to 2027. Sites 451b, 451c

& 451d can supply 430 as a minimum. This is 2.5 times the requirement. We also note that in para 3.51, "a larger development (of more than 70 dwellings) would be out of character with the rest of the village. " If this is true of site 451b, is it not true also of sites 451c+451d? We consider that at least 360 dwellings on sites 451c+451d to be

excessive. Please see attached file.

Change to Plan Development on sites 451c+451d should be limited to approx. 100 dwellings. These should occupy site 451c plus the

disused poultry farm and continue to the east along Howlett Way if necessary. The poultry farm is already a brown field

site.

Any development on sites 451c and 451d must incorporate a landscaped buffer zone between the existing properties on the western boundary and the new development. The zone should be planted with screening trees and be at least 30

metres deep. Please see attached file.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments: Para359.pdf

O - 6725 - 3779 - 3.60 - None

6725 Object

Housing 3.60

Respondent: Ms Laura Locke [3779] Agent: N/A

Full Text: Road infrastructure on High Road not suitable for increased volumes of traffic. Bottleneck at shop and Eagle House very

dangerous particularly at rush hours. Delivery vehicles, buses, cars parked on pavements.

Summary: Road infrastructure on High Road not suitable for increased volumes of traffic. Bottleneck at shop and Eagle House very

dangerous particularly at rush hours. Delivery vehicles, buses, cars parked on pavements.

Change to Plan Fewer houses

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified Non

O - 6726 - 3779 - 3.63 - None

6726 Object

Housing 3.63

Respondent: Ms Laura Locke [3779] Agent: N/A

Full Text: Over the years there has been a decline in skylark population it has been noted.

It is agrucultural land. Are there no alternative brown belt options identified?

Summary: Over the years there has been a decline in skylark population it has been noted.

It is agrucultural land. Are there no alternative brown belt options identified?

Change to Plan Brown belt options and further investigation of endangered species

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6728 - 3779 - 3.64 - None

6728 Object

Housing 3.64

Respondent: Ms Laura Locke [3779] Agent: N/A

Full Text: Rights of way, bridlepaths, a lack of suitable roads and a site of historic interest - the area should not be overwhelmed

Summary: Rights of way, bridlepaths, a lack of suitable roads and a site of historic interest - the area should not be overwhelmed

Change to Plan Further consideration required of sustainability of village character, natural environment and infrastructure

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6729 - 3779 - 3.65 - None

6729 Object

Housing 3.65

Respondent: Ms Laura Locke [3779] Agent: N/A

Full Text: Other ancient properties will also be encroached upon.

Summary: Other ancient properties will also be encroached upon.

Change to Plan Consideration of sympathetic treatment of this ancient part of the village.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6570 - 3698 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

6570 Object

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: Ms S Nunn [3698] Agent: Ν/Δ

Full Text: As a resident in Trimley st Martin, I wish to raise my concerns with regards to the idea of future residential development

of the field/land off Howlett Way, Trimley St Martin, Felixstowe. This road and indeed the rest of Trimley st Martin's roads are going to be put under considerable strain in the near future with the current building of 66 houses on the new Cavendish Grove development. As Howlett Way is also the main access road to and from Trimley St Mary having even more traffic travelling along this road the impact on the surrounding area will be considerable with road safety, sound and air pollution affecting the local environment greatly. I feel you, the council will be able to find a better alternative to

this site.

I wish to raise my concerns with regards to future residential development of the field/land off Howlett Way, Trimley St Summary:

Martin. This road and the rest of Trimley st Martin's roads are going to be put under considerable strain in the near future with the current building of 66 houses on the new Cavendish Grove development. As Howlett Way is also the main access road to and from Trimley St Mary having even more traffic travelling along this road the impact on the surrounding area will be considerable with road safety, sound and air pollution affecting the local environment greatly.

Change to Plan

Appear at exam? Legal? Sound? **Duty to Cooperate? Soundness Tests** None

Not Specified Not Specified Not Specified Not Specified

C - 6589 - 3620 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

6589 Comment

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

N/A Respondent: Trimley St Martin Parish Council (Mr Gordon Agent:

Mussett) [3620]

[See attached document for full comments] **Full Text:**

Trimley St Martin have considered the two sites within their Parish, and our comments are shown below:-

Policy FPP6 - Land opposite the Hand in Hand Public House, High Road - residential development Whilst in principle the Council would prefer to see this site undeveloped, if development is to occur the Council would like the following changes and additions to policy FPP6:-

Applicants should have regard to the following:-SCDC Policy Wording TSM Proposed Wording

Primary vehicular access onto High Road The ONLY vehicular access is to be onto High Road

- b) Village green to be created fronting onto High Road to reduce impact on the setting of the Hand in Hand Public House Village green to be created fronting onto High Road to reduce impact on the setting of the Hand in Hand Public House
- Existing Public Right of Way to be retained and integrated into the site layout Existing Public Right of Way to be c) retained and integrated into the site layout
- 70 dwellings expected on the site as a minimum with affordable housing provision to be in line with Core Strategy Policy DM2 70 dwellings expected on the site AS A MAXIMUM with affordable housing provision to be in line with Core Strategy Policy DM2
- Future residential properties should not extend beyond the residential curtilage of 21 Grimston Lane FUTURE DEVELOPMENT (RESIDENTIAL OR COMMERCIAL) should not extend beyond the residential curtilage of 21 Grimston Lane
- A range of housing types and tenures in keeping with the surrounding area and in line with Core Strategy Table 3.6 A range of housing types and tenures in keeping with the surrounding area and in line with Core Strategy Table 3.6. The range to be determined by a Local Housing Needs Survey conducted by an independent organization and paid for by the developer.
- Maximum build height of 2 storeys Maximum build height of 2 storeys
- High percentage of bungalow/low rise units to reflect character of the surrounding area High percentage of bungalow/low rise units to reflect character of the surrounding area
- Air Quality assessment required Air Quality assessment required

Road widening of High Road to provide layby parking on its south side (the north boundary of this development Junction control (mini-roundabout or traffic lights) for access road opposite Mill Lane

Pedestrian crossing in High Road to enable residents from new development to access services

Policy FPP7 - Land off Howlett Way - residential development

Whilst in principle the Council would prefer to see this site undeveloped, if development is to occur the Council would like the following changes and additions to policy FPP7:-

Applicants should have regard to the following:-

- SCDC Policy Wording TMS Proposed Wording
 a) Primary vehicular access onto Howlett Way The ONLY vehicular access to be onto Howlett Way
- b) No vehicular access onto Church Lane No vehicular access onto Church Lane
- Links to existing Public Rights of Way Network Links to existing Public Rights of Way Network c)
- 360 dwellings expected on the site as a minimum with affordable housing provision to be in line with Core d) Strategy Policy DM2 360 dwellings expected on the site AS A MAXIMUM with affordable housing provision to be in line with Core Strategy Policy DM2
- A range of housing types and tenures in keeping with the surrounding area and in line with Core Strategy Table 3.6 A range of housing types and tenures in keeping with the surrounding area and in line with Core Strategy Table 3.6.
- The range to be determined by a Local Housing Needs Survey conducted by an independent organization and paid for by the developer.
- Development to be sympathetic to the setting of the Old Rectory Development to be sympathetic to the setting of the Old Rectory
- Site design and layout to take into account the water mains crossing the site Site design and layout to take into account the water mains crossing the site
- On-site open space and play facilities to meet needs identified in the SCDC Leisure Strategy On-site open space and play facilities to meet needs identified in the SCDC Leisure Strategy
- Air Quality Assessment needed Air Quality Assessment needed

Maximum build height of 2 storeys

Policy FPP7 - Land off Howlett Way - residential development Summary:

Whilst in principle the Council would prefer to see this site undeveloped, if development is to occur the Council have made numerous changes and additions to the policy requirements of FPP7.

Change to Plan

Duty to Cooperate? Legal? Sound? Soundness Tests Appear at exam?

Not Specified Not Specified Not Specified Not Specified None

C - 6589 - 3620 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

6589 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

Attachments:

Trimley St Martin Comments.pdf

C - 6617 - 3734 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

6617 Comment

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: Mr K and Mrs E D'arville [3734] Agent: N/A

Full Text: RE: HAVE YOUR SAY - HOUSING DEVELOPMENTS ON:-

Land off Howlett Way, Trimley St Martin

Land opposite the Hand in Hand pub, Trimley St Martin

Land off Thurmont Lane, Trimley St Mary

I understand the need for further development for housing but my concerns are:-

- 1. The livelihood of the farmer/s. Are they happy to give up these areas they have been working and earning a living from for the past x number of years?
- 2. Exactly how many 'affordable homes' ie one and two-bed dwellings will be allocated for current homeowners to purchase who wish to upsize or downsize?

I say this because, on making enquiries on purchasing a two-bed property on the Mushroom Farm complex, I was informed they were all going to the Housing Association, which I consider rather unfair to current homeowners who want to move

- 3. I understand land opposite the Hand in Hand is due to undergo development. Will there be any chance of a decent number of 2-bed dwellings being offered on the open market or will the same policy apply as the Mushroom Farm policy?
- 4. If and when it does come to the planning of the above developments can care be taken on:-
- a) The planting of trees ie avoiding species such as Sycamore which are an absolute nightmare for those who have to clear up after them, not only in the Autumn but Spring as well. It's not just their leaves to clear up but also their constant seedlings, which can take root, if allowed, and not a good idea if right next to your house.
- b) Storm drains. Can the planners avoid installing storm drains, which are subsequently written in the deeds of the homeowners as their responsibility, as a group, to share the maintenance and costs, and not the council. Yes I speak from experience.
- c) Kerb side general areas all nicely planted up but again subsequently written into the deeds of homeowners to share costs/responsibility of maintaining.

 In real life this does not work.

Your comments/feed back on the above would be much appreciated.

Summary:

I understand the need for further development for housing but my concerns are:-

The livelihood of the farmer/s. Are they happy to give up these areas they have been working and earning a living from for the past number of years?

How many 'affordable homes' ie one and two-bed dwellings will be allocated for current homeowners to purchase who wish to upsize or downsize?

Care is needed when planting trees and avoiding sycamores which are a nightmare to clear up after. Storm drains should be responsibility of Council, not indivual land oweners.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6635 - 2963 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

6635 Comment

Full Text:

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: Suffolk Coastal District Council (SCDC Agent: N/A

Environmental Protection) [2963]

I would like to comment, with regard to air quality, on the above Preferred Options Consultation as follows:

1) Felixstowe Peninsula Area Action Plan

* Land North of High Street, Walton - SHLAA Ref 451g
Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be
recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this

site.

* Land rear of Conway Close, Felixstowe - SHLAA Ref 502e

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

- * Land opposite Hand in Hand Public House, Trimley St. Martin SHLAA Ref 451b Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.
- * Land off Howlett Way, Trimely St. Martin SHLAA Ref 451d and 451c Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with both of these sites.
- * Land South of Thurmans Lane, Trimley St. Mary SHLAA Ref 383f and 451f Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with both of these sites.

* Employment

Land at Haven Exchange

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

- 2) Site Allocations & Area Specific Policies Development Plan Document
- * SSP10 Garden Square, Rendlesham

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* SSP11 - 3-33 Suffolk Drive, Rendlesham

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* SSP22 - Bentwaters Park, Rendlesham

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* SSP 31 - Snape Maltings

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

Other comments

With regard to the Neighbourhood Plans for Woodbridge, Kesgrave and Leiston (and any others in the pipeline), we have particular concerns about developments with the potential to impact upon the volume and/or types of vehicular traffic at the Woodbridge Air Quality Management Area.

C - 6635 - 2963 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

6635 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

It is sometimes difficult to convey to developers the importance of AQ impacts in respect of developments which may be, (by their own judgement) a significant distance from the Woodbridge AQMA; however, efforts to find ways of reducing the elevated levels of transport-related pollutants at this location to below the levels required by the EU Air Quality Directive (and UK regulations) have consistently failed to produce the required improvements in the 10 years or so since this AQMA was declared. This failure could result in financial penalties to the UK government from the EU. We are assured that any such penalties will be passed on to LAs with "failing" AQMAs in their districts. Consequently, we need to leave no stone un-turned in our examination of any proposed larger scale development (whether housing or otherwise) which has the potential to increase vehicle traffic at the existing Woodbridge Junction AQMA is consequently a matter of serious concern. Any such scheme must be accompanied by technical and robust modelling to predict the impact on traffic at this AQMA, accompanied by and assessment of the possible methods of mitigating those impacts.

The same general comments apply to some areas where our modelling/sampling indicates AQ thresholds are under pressure (but not yet breached) from transport-related sources.

Summary:

* Land off Howlett Way, Trimely St. Martin - SHLAA Ref 451d and 451c Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with both of these sites.

Change to Plan

Appear at exam?
Not Specified

Legal?

Sound?

Duty to Cooperate?

Soundness Tests

Not Specified Not Specified Non-

O - 6704 - 3767 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

6704 Object

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: Rebecca Atherstone [3767] Agent: N/A

Full Text:

One look at the Felixstowe Peninsula Action tells us we are right in the middle of The Proposed building of houses. It's a reassurance to read that any future development should be 'sympathetic to the setting' of our house.

We thank the Council for that inclusion.

But the number of houses is a huge blow.

My 'Have Your Say' includes wildlife photographs I have taken from our kitchen window. If the mass development occurs...then it will be gone.

The other photographs of the field behind show the bridle path. Research suggests that this may have been a flank off the High Road, (originally created by the Romans.) History reveals that the road was created to allow the Romans to reach the fort at Walton. Therefore the bridle path, in turn, must be a rather ancient link across the Colneis Hundred. Our High Road today is already traffic busy...we will be creating a vehicle nightmare.

As you will be aware, the Colneis Hundred, dating back to the Domesday Book (listed as Colneyse) is only four miles by ten, one of the smallest Hundreds in Suffolk. It includes the villages where Trinity College want to sell and build. ('Hundreds', An ancient division applied to a county).

The other photographs in the field show two splendid oak trees in the centre. (Do you have a TPO on these?). Another huge oak tree sits at the corner of our meadow. This is frequented by tawny owls (they have fixed territories). It is a joy to hear them. Will they disappear too?

Down one side of our meadow is a row of mature fruit trees. One day, about eight years ago, a man who was a council official appeared. He asked to look at them. I didn't have a problem with that at all....in fact, when he left he remarked that we should 'have them protected as they were so lovely'....I wonder if that visit is on your files somewhere? There is also a ditch bordering the end of our meadow, (pictures) many little animal homes are there as well. It's not just

a boring old ditch, it houses a varied wildlife community. In our house we have experienced some unusual animals over the years. One morning after a hot summer night I had a bat flapping round my head on the

landing. Amazing. I had never seen one so close up. It rested briefly on the

ledge and flew back out of the open window. I don't suppose many people have had a weasel visit them either. (In the upstairs loo, a 'present' from our cat. It was duly rescued). Oh....and not forgetting the green woodpecker in the sitting room. Again, rescued.. and put back outside, despite its vice like grip that almost brought tears to my eyes. I am just trying to paint a picture for you that may be beyond restoration in future years.

The pillbox can't be ignored. During 1940/41 some eighteen thousand were built. Twenty percent remain. Only around a thousand survive intact (this is one of them). They were part of a longline of defence down the Eastern part of England. The idea being any ground attack by the enemy could be 'held off' until mobile troops arrived to counter attack. It's part of our living history. It's a mark to the tenacity of the British people.

You won't need me to tell you that there have been Anglo-Saxon finds in Trimley St Martin,roof tiles, pots, etc. In fact all over the Felixstowe Peninsula.

Archaeologists must be rubbing their hands.

In 1974 when the A14 cut through the parish to cater for the Port, many feared village identity for the Trimleys would be lost......it wobbled, but survived. Soon we won't know where we begin and end. The narrow tongue of the Felixstowe Peninsula will lap up every creature and natural habitat and swallow it whole for Trinity's millions.

Trinity College Cambridge are in the top five of the wealthiest landowners in England. It's suggested that they are worth around the 800 million mark.

As we know, money talks...BUT,wethe little People,have elected OUR councillors to look after and preserve OUR way of life.

Development is needed....but surely it can be done without tearing up a whole field of highly fertile ground which is reckoned to be some of the best in the country.

As far as we are concerned...and I suspect others who look over this field.... There would need to be a big gap between any start of housing work.

Amelioration with more tree lines planted all around borders to try and preserve the countryside. If the planned houses then sat in their own little piece of nature,..... perhaps just a few creatures would survive.

So might....

The Oak Trees.

The Pillbox.

Maybe some of the residents too.

Summary:

In 1974 when the A14 cut through the parish to cater for the Port, many feared village identity for the Trimleys would be lost......it wobbled, but survived. Soon we won't know where we begin and end. The narrow tongue of the Felixstowe Peninsula will lap up every creature and natural habitat and swallow it whole for Trinity's millions. Development is needed....but surely it can be done without destroying wildlife habitats, trees, wartime pill box and tearing up a whole field of highly fertile ground which is reckoned to be some of the best in the country.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

O - 6704 - 3767 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

6704 Object

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

R Atherstone Photos.pdf

O - 6747 - 3786 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

6747 Object

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: Thelma Webber [3786] Agent: N/A

Full Text:

I am a resident of Church Lane, Trimley St Martin and my property boundary runs alongside the Lane. One of the walls of the property (which is the main bedroom) is adjacent to the lane with no barrier. Church Lane is not a through road but services the residents and is also a Bridleway. Apart from the very top the lane is very narrow especially where it runs alongside my property and is only capable of accommodating one car's width at a time. I understand from paragraph 3.60 of the Felixstowe Peninsular AreaAction Plan that the Suffolk Council acknowledges that this Lane is not suitable for access traffic to an estate and therefore should remain as it is now.

I understand that new housing is inevitable but I would like to again reiterate that my bungalow runs alongside the Lane and therefore most of the Windows face the field which has been proposed for development along with most of the back garden. This would therefore have an adverse effect on me as my conservatory, lounge, dining room, kitchen, 2 bedrooms all have outlooks across the field and would be overlooked by any development of houses along with most of my garden. This would mean loss of privacy and loss of light and change the whole environment from one of quiet to one of noise and also change the whole open aspect of the neighbourhood. It would change the whole area of 4 or 5 houses in the middle of countryside to being in the middle of a housing estate

It is essential that the existing hedgerow along Church Lane is kept and that enough space is allowed so that no housing is right up against the hedgerow and additionally trees or appropriate screening is done so that my whole bungalow and back garden is not overlooked taking away my privacy in my own house.

It is also essential that the area is not overdeveloped with an unacceptable high density of housing which again will affect the open aspect of the neighbourhood. There would certainly be loss of views and loss of the character of the neighbourhood and this would adversely effect the residential amenity of neighbours. The whole character of this area would dramatically change, visually and environmentally with day to day living.

It should also be borne in mind that several of the properties are LISTED and this development would change the setting of the listed buildings.

As I have said already I realise that a certain amount of new housing is inevitable but I trust the Suffolk Council will be sensitive to the concerns of the neighbouring properties and to the environment as a whole.

Summary:

It is essential that the existing hedgerow along Church Lane is kept and enough space is allowed so that no housing is right up against the hedgerow. Additionally screening is done so that my bungalow and back garden is not overlooked. It is essential that the area is not overdeveloped with a high density of housing which will affect the open aspect of the neighbourhood. There would be loss of views and of the character of the neighbourhood and this would adversely effect the residential amenity of neighbours. The whole character of this area would dramatically change, visually and environmentally.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Photos.pdf

C - 6800 - 3677 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

6800 Comment

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: S BROWN [3677] Agent: N/A

Full Text: The footpath to the west of this land is not a foot path but is actually an ancient wide track way called Crows Well Way

which has been in use since the 1500's until the building on the Trimley by-pass in 1974. Therefore the width of the

track should be kept which at present is some 10 meters wide.

Summary: The footpath to the west of this land is not a foot path but is actually an ancient wide track way called Crows Well Way

which has been in use since the 1500's until the building on the Trimley by-pass in 1974. Therefore the width of the

track should be kept which at present is some 10 meters wide.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6803 - 3770 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

6803 Object

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: mr Stephen Dowse [3770] Agent: N/A

Full Text: We moved into our home in 1998. We paid over the expected cost because of its location. We live overlooking open

fields. If the development goes ahead we would lose this and we would overlook bricks and roofs. If this does go ahead I hope that someone, ie the council will pay us compensation as our home would certainly drop in value. Also I hope

there would be some sort of screening trees or boundary separations?

We have a major problem with traffic in the High Road. Nobody takes any notice of the yellow lines and often? when the

shop is taking delivery the lorries park across Church Lane and cause a problem. If a possible additional 700 cars

happen then almost certainly, there will be a very bad accident.

There will be a major problem with bad roads, lack of school places and doctors places.

You state on all your paperwork (WHERE QUALITY OF LIFE COUNTS) Maybe you should think again.

Summary: There needs to be some screenting trees or boundary separations to reduce impact of new development. We have a

major problem with traffic in the High Road. Nobody takes any notice of the yellow lines? When the shop is taking delivery the lorries park across Church Lane and causes a problem. If a possible additional 700 cars happen then

almost certainly, there will be a very bad accident.

There will be a major problem with bad roads, lack of school places and doctors places.

You state on all your paperwork (WHERE QUALITY OF LIFE COUNTS) Maybe you should think again.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6847 - 3826 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

6847 Object

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: Chris Young [3826] Agent: N/A

Full Text: Have you ever tried to get along the various "High Roads" in the Trimleys / Walton at busy times?

It is not a good situation currently and the prospect following the developments proposed can only be described as dire. That is both for vehicles and, more worryingly, should you be unfortunate enough to be trying to get about on foot!

Just how many more vehicles are envisaged on the road following the developments you are proposing? I don't see how this can ever lead to an improved situation for the hard pressed local citizens - those people you are supposed to represent at worst; to say care for being a step too far in light of the proposals you have put forward!

Just imagine for a moment the impact of the construction traffic for the duration of the various builds. At the moment the ordinary traveller can find it difficult to make progress; just think how it will be with the constant flow of heavy, labouring construction HGVs. Combined with an assortment of parked vehicles, public transport vehicles, delivery vehicles, agricultural vehicles, horses on the road and an ever growing number of pedal cyclists the "High Roads" will become a nightmare to venture upon. I have concerns for the general motorist, particularly those of advancing years and I pity the poor pedestrian of all ages, including the pupils at the new Academy, as they try to make progress, particularly when the weather becomes inclement for one reason or another.

All this is on top of concerns about infrastructure, services and facilities which are all very doubtful at the moment.

You have a very long way to go to provide the assurances that are necessary to make the ordinary local citizen feel that these developments are either necessary or achievable without a major downturn in living standards and conditions. Do not expect us to meekly go along with you and the Developers in what will be a major lowering of our living expectations.

Summary: Have you ever tried to get along the various "High Roads" in the Trimleys/Walton at busy times? Just how many more vehicles are envisaged on the road following the developments you are proposing?

I have concerns for the general motorist, particularly those of advancing years and I pity the poor pedestrian of all ages, including the pupils at the new Academy, as they try to make progress, particularly when the weather becomes inclement for one reason or another. All this is on top of concerns about infrastructure, services and facilities which are all very doubtful at the moment.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7105 - 3314 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7105 Comment

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: Lorna Adamson [3314] Agent: N/A

Full Text: Comments on the Felixstowe Peninsula Action Plan

FPAP 3.07 I welcome the aim to preserve as far as possible prime agricultural land for food production. FPAP 3.20 I welcome the statement that proposals for new residential development outside the physical limits boundaries will be strictly controlled in accordance with national planning policy and the strategy for the countryside as set out in Core Strategy policy SP29.

I welcome the statement that extending the boundaries further was considered inappropriate because this may lead to further development in locations which are not well related to the existing settlements, services and facilities and lead to new building encroaching into the countryside.

FPAP 3.26 to 3.38 Land north of Walton High Street I am concerned at the loss of prime grade 1 and 2 agricultural land with the proposals for this site when 3.07 states the aim to preserve to preserve prime agricultural land for food production. I am not clear what 'mitigation may offset the loss of greenfield land of Grade 1-2 Agricultural soil classification'. I am also concerned about the potential for very heavy traffic on the High Road opposite Felixstowe Academy. The High Road is the main route into Walton and Felixstowe used by many residents living in the Trimleys in order to avoid the Howlett Way sliproad onto the A14 with heavy lorries to the docks bearing down on local vehicles. There should be a transport assessment carried out on the implications for the High Road - particularly at peak times of the day.

FPAP 3.50 Site opposite the Hand in Hand pub in Trimley St Martin I would endorse the need for a transport assessment here too as 'access to this site must be onto High Road as this provides the most suitable access point for the development and would also require a transport assessment to be undertaken as part of any future application. In addition, there is 'the major negative environmental effect is due to loss of Grade 2 agricultural soils.' I should be interested to know what 'Scope exists to mitigate for this effect.'

FPAP Site 451c and 451d With my concerns about the implications of development for traffic congestion and danger for users on the High Road, I am very worried about the proposal for a minimum of 350 houses on this site. The SSAASP mentions only a transport assessment for Howlett Way. There is also the major negative environmental effect from the loss of Grade 2 agricultural soils and again I am unconvinced by the statement 'scope exists to mitigate for this effect'. There should at least by a transport assessment carried out on the implications for the High Road - particularly at peak times of the day.

The Old Poultry Farm - which the site 451c wraps around - is brownfield land and an eyesore. I cannot see anyone particularly wishing to live in houses which are built beside this derelict site.

FPAP Appendix 3

I welcome the decision to discount the sites in Trimley St Martin set out in this Appendix. However, I am very disappointed that sites 920, 928 and 726 have been left for consideration in 'The local plan review' when they so clearly in my view violate national planning policy and the strategy for the countryside as set out in Core Strategy policy SP29.

Summary:

With my concerns about the implications of development for traffic congestion and danger for users on the High Road, I am very worried about the proposal for a minimum of 350 houses on this site. The SSAASP mentions only a transport assessment for Howlett Way. There is also the major negative environmental effect from the loss of Grade 2 agricultural soils and again I am unconvinced by the statement 'scope exists to mitigate for this effect'. There should at least by a transport assessment carried out on the implications for the High Road- particularly at peak times of the day.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7119 - 3898 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7119 Object

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: Sharon lannuzzi [3898] Agent: N/A

Full Text: I am writing in response to the invitation for local people to give their opinions on the proposed plans for the peninsular.

70 houses on land opposite the Hand in Hand - not in favour

The Hand in Hand is a Grade 2 listed building as is the cottage adjacent to the right hand side of the field. Possibly there are other properties in that area that are also listed. There are already 60 house being built on the Mushroom Farm site so to add an additional number of houses on that scale would create an estate. The Mushroom Farm site will create additional traffic however the roundabout will aid this. To create another entrance further up will create extra traffic and the additional houses would spoil the village feel to the area and spoil the view for houses in that area. The Trimley Sports and Social Club is an excellent social venue for our area. The committee have worked hard on limiting outdoor noise. I would be saddened if new residents complained about noise levels and this venue was forced not to stage events for the local community.

300 houses Howlett Way - Not in favour

As one of the organisers of Trimley carnival, I would not be in favour of that number of houses being located there. Howlett Way is a 'pinch point' when the procession passes. 300 houses would create an awful lot of traffic during rush hours and affect school traffic on the High Road. Our 2 Trimley Schools are running almost at capacity for pupil numbers. Where would these families be schooled? Could The Academy cope with extra numbers? If our Trimley Schools needed expanding, where would the revenue come from? School budgets are currently stretched.

100 houses off Thurmans lane/Thomas Avenue - In favour

Providing the access to these houses is via Faulkeners Way, from Thomas Avenue/The Josselyns, this proposal does make sense. The houses would be built onto an existing estate on land adjacent to the A14. The number of houses may need to be reviewed to ensure they do not impact on houses in Thurmans Lane/Church Lane.

Sunday Market Site - in favour

Unfortunately the Sunday market has fallen into decline in recent years and the current number of stalls can be easily managed on the Mannings site. Therefore it makes sense to build on this piece of land to improve the visual impact of this piece of land and tie in with the nearby regeneration of Martello Park.

With regard the proposal for houses in Walton near the Academy, I feel I would need more information before making a decision.

I look forward to hearing about future developments with these proposals.

Summary:

As one of the organisers of Trimley carnival, I would not be in favour of that number of houses being located there. Howlett Way is a 'pinch point' when the procession passes. 300 houses would create an awful lot of traffic during rush hours and affect school traffic on the High Road. Our 2 Trimley Schools are running almost at capacity for pupil numbers. Where would these families be schooled? Could The Academy cope with extra numbers? If our Trimley Schools needed expanding, where would the revenue come from? School budgets are currently stretched.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7142 - 744 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7142 Comment

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: Historic England (Sir/ Madam) [744] Agent: N/A

Full Text: Re: Preferred Options Public Consultation (19th October - 30th November 2015)

Felixstowe Peninsula Area Action Plan

Thank you for your letter dated 15th October 2015 regarding the above consultation. We have had the opportunity to assess the letter and consultation documents and can offer the following. Please note we have provided comments on the Site Allocations and Area Specific Policies within a separate letter to you dated the same. This follows a previous consultation and our comments dated 25th February 2015.

In terms of our general comments:

Recent Guidance from Historic England

We have recently published guidance on the Historic Environment and Site Allocations. Where we have not made comment below some additional guidance on ensuring a positive strategy for the historic environment is secured within the Felixstowe Area Action Plan can be seen by following this link- http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/.

In terms of our site specific comments:

Housing Sites

FPP4: Land north of Walton High Street, Felixstowe (451g)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the possible impact on the setting of two Listed Buildings, Grade II* Listed Walton Hall and Grade II Listed 362 High Street. We highlighted that the principal elevation of Walton Hall faces north and overlooks site 451g. It was considered that development here would urbanise the setting of this important, highly designated heritage asset, resulting in harm to its significance. It was expressed that harm would also be caused to the Grade II lodge and we strongly advised that an alternative site was found for development, though it was thought that there may be scope for some limited development at the eastern end of this site. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. The policy does however highlight that the development will need to be sympathetic to the Listed Buildings found at Walton Hall and 362 High Street. Whilst this would go some way to allay our concerns we still recommend that whilst it is considered the site can take a level of development there would be a detrimental harm to the setting of the Listed Buildings if the whole site is developed. If the site is to remain in the plan we would advise that the western end of the site is left relatively undeveloped to help protect the setting and it is considered that this side of the site might lend itself to fulfil the Public Open Space requirement.

FFP5: Land north of Conway Close, Felixstowe (502e)

We welcome the acknowledgment of the Listed Buildings and the requirement that development will need to be sympathetic to the Listed Buildings within the policy. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FFP6: Land opposite Hand in Hand Public House, Trimley St Martin (451b)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of two Grade II Listed Buildings (the Hand in Hand public house and Nos 251 and 253 High Road). We highlighted that both these buildings are traditional vernacular structures that date back to the agrarian origins of the village, and their current proximity to open countryside contributes to their setting and significance. We therefore encouraged the Local Planning Authority to identify alternative sites if at all possible so that the setting of these two buildings might be protected. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. However, it is also acknowledged that the policy requires a village green to be included within the scheme. The village green is to front High Road in order to reduce the impact on the setting of the Hand in Hand public house and this is particularly welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP7: Land off Howlett Way, Trimley St Martin (451c and 451d)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of the two Grade II listed churches and the Grade II listed Old Rectory. Whilst it is acknowledged that the consideration of the setting of the rectory is included within the policy, and this is welcomed, we would advise that the setting of the churches is also included. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP8: Land off Thurmans Lane, Trimley St Mary (383f and 451f)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of Grade II Listed Building Mill Farmhouse. It is acknowledged that there is a requirement in the policy that the development will need to be sympathetic to the setting of the mill and this is welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

Town Centre

FFP14: Felixstowe Town Centre and FFP15: Retail Frontages

As outlined within our response to you dated 25th February 2015 it is considered these policies should cover

C - 7142 - 744 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7142 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

conservation and design issues. It is considered the policies should highlight the importance of retaining or restoring historic shopfront features both in terms of the positive contribution historic shopfronts make to the character of an area but also the economic benefit of providing traditional and bespoke shopping units to shopowners. A good example of how historic shopfronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a National success. The council have also seen a ripple effect of surrounding properties being restored. As well as including conservation and design issues within these policies the Council could consider additional advice within a Supplementary Planning Guide on Historic Shopfronts, especially given the importance and contribution the Historic shopping areas within the settlements of Suffolk make to the wider area.

District Centres

FPP17: District Centres

As above it is considered that this policy should cover conservation and design issues. It should highlight the contribution the Historic Environment makes to the economic success of district centres and seek to protect and enhance both the setting of historic assets and assets themselves.

Tourism and Sea Front Activities

We welcome the inclusion of a section which covers tourism and seafront activities. It is considered that point 6.03 on page 61 could also acknowledge and highlight the wider and more general positive contribution to Felixstowe that heritage tourism brings.

FFP18: Felixstowe Ferry and Golf Course, FFP19: Felixstowe Ferry Golf Club to Cobbolds Point, FPP20: Cobbolds Point to Spa, FPP21: Spa to Martello Park and FFP22 Martello Park to Landguard We welcome and support the acknowledgement and required protection of the historic qualities of these sections of the coast.

FPP23: Car Parking

We welcome the 'high quality of design' requirement relating to replacement car parking at point 6.36 on page 72. It is considered that this requirement should be included within the policy itself to give it more weight in decision making.

The Environment

We welcome the inclusion of a section on the Historic Environment which sits separately from landscape and ecological elements. We also welcome the section on Locally Listed Buildings and Features. It is considered the Historic Environment section should also highlight Felixstowe's archaeology.

It is acknowledged that no individual policies on the Historic Environment are proposed for the Area Action Plan itself, relying instead on saved policies within the Core Strategy and the National Planning Policy Framework. The Core Strategy does not have a specific historic environment policy, with certain aspects covered in other policies such as SP15 (Landscape and Townscape) and DM21 (Design Aesthetics) and policies for specific settlements. It is considered that there is a lack of a clear strategy relating to the Historic Environment, relating to local issues, at present, and we would encourage greater clarity. This should set out the Council's approach to the management of designated and non-designated heritage assets (including archaeology) and how issues such as heritage at risk will be tackled. It is considered that a Historic Environment Policy could be locally specific to cover the Felixstowe Peninsula Area Action Plan.

In addition to the above it is acknowledged that the issue of Felixstowe South Conservation Area At Risk is not being covered by the Plan. We therefore reiterate our previous comments as follows, it would be advantageous if the Area Action Plan identified specific policies to help remove it from the register. These might include utilising the conservation area appraisal to identify locally important buildings that contribute positively to the conservation area, and introduction Article 4 directives to protect such buildings. There may also be sites which are considered negative contributors to the character and appearance of the conservation area and the preparation of development briefs for such sites might help bring forward positive redevelopment. The conservation area survey identified the loss of architectural detail as a significant problem, and consideration might therefore be given to applying to the Heritage Lottery Fund for a Townscape Heritage programme for the area, or a smaller partnership scheme with Historic England to reinstate lost architectural details on key buildings. We would therefore still recommend the inclusion of a policy which tackles the issues at Felixstowe South Conservation Area.

FPP26: Areas to be Protected from Development

In our response to you dated 25th February 2015 we expressed concerns regard the inclusion of all the sites in Trimley St Martin which would in effect surround a number of Listed Buildings including Grade II listed churches, the Grade II listed Old Rectory and Grade II Listed Building Mill Farmhouse. We recommended the inclusion of an area to be protected from development which would protect the remaining green wedge and as a result protect the setting of a number of Listed Buildings. It is acknowledged that the green wedge within Trimley St Martin is proposed to be included within the Areas to be Protected from Development and this is particularly welcomed and supported.

FPP27: Historic Park and Garden

We welcome the inclusion and the content of this policy.

C - 7142 - 744 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7142 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

Other Issues

Coastal Change Management and Areas of Flooding

We welcome the inclusion of this section. It is considered this section should also contain a paragraph on issues and opportunities of climate change and flooding relating to the Historic Environment. Further guidance on flooding issues can be found here- http://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/.

For information and for further policy consultation please note our new consultation email address for the East of England, eastplanningpolicy@HistoricEngland.org.uk.

Summary:

We previously expressed concerns in respect of the site due to the impact on the setting of the two Grade II listed churches and the Grade II listed Old Rectory. Whilst it is acknowledged that the consideration of the setting of the rectory is included within the policy, and this is welcomed, we would advise that the setting of the churches is also included. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7174 - 3162 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7174 Comment

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: Denise Scott [3162] Agent: N/A

Full Text:

Whilst I appreciate the need for new housing in the Felixstowe peninsular I cannot see how all these houses in the villages of Trimley St Martin and St Mary can be justified. The road is busy now as people DONOT use the A14 to go in and out of Felixstowe and it is further gridlocked whenever there is an accident on A14 Presumably the Thurmans Lane access though Josselyns will create problems on the High Road

The on going development on the mushroom farm has access via the roundabout which is an excellent but how many of these cars will

- (a) turn left to go towards the A14
- (b) turn right to Felixstowe instead of going straight to the Kirton roundabout and on to the A14

Which brings me to the proposed development at the old poultry farm will the access be onto Howlett Way or the roundabout on High Road?

The proposed dwellings opposite the Hand in Hand will generate even more cars on this busy section and the concreting of land will I am sure result in more surface water run off. It mentions that this development will not go beyond 21 Grimston Lane presumably so the farmer can still access some of the agricultural land

The drains sewers are outdated can they take any more development without being updated

When I mentioned to your officer at the consultation why is the infrastructure not sorted before building houses he said that's the way it is!

Of the preferred options if we MUST have some dwellings I suppose the old poultry farm development seems the logical choice accesswise which hopefully will not result in more cars using the high road through our villages.

And hopefully this being a larger development of mixed houses will include some affordable houses for the younger generation of the village.

With all these proposed dwellings the villages will become suburb of Felixstowe.

Summary:

Which brings me to the proposed development at the old poultry farm will the access be onto Howlett Way or the roundabout on High Road?

Of the preferred options if we MUST have some dwellings I suppose the old poultry farm development seems the logical choice accesswise which hopefully will not result in more cars using the high road through our villages.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7255 - 312 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7255 Object

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: STAG (Mr Ian Cowan) [312] Agent: N/A

Full Text: Consultation Response: Felixstowe Peninsula Area Action Plan

I am making this response by e-mail because the online consultation system is cumbersome and confusing.

Here is my response to the Felixstowe Peninsula Area Action Plan Consultation Document.

One: The so-called housing need in the Felixstowe Peninsula Area Action Plan does not recognise that according to the 2011 Census the population of Felixstowe and the Trimley Villages shows a downwards instead of an upwards trend. This means that houses already built an in the pipeline should be more than sufficient for future needs.

Two: The Felixstowe Peninsula Area Action Plan dishonestly has ignored firm promises made in the Local Plan that the housing needs evidence base will be updated by 2015 to take account of Census movements. An honest re-evaluation would confirm my comments at One above.

Three: When housing numbers are mentioned in the Felixstowe Peninsula Area Action Plan they are usually prefixed by the weasel words "a minimum". Therefore, so far as Trimley St Martin is concerned, there will be a minimum of 70 houses opposite the Hand In Hand and a minimum of 330 houses at Howlett Way. Add the 66 houses currently being constructed at the Mushroom Farm and this will give a minimum of 496 extra houses in the village. There will also be a minimum of 1,810 throughout the Colneis Peninsula

Four: A minimum of 496 extra houses in Trimley St Martin is disproportionate to the number of houses proposed for other, larger conurbations.

Five: A minimum of 496 extra houses in Trimley St Martin will disproportionately increase the population of the village from around 1,900 to over 3,000.

Six: A minimum of 496 extra houses in in Trimley St Martin will completely alter the character of the village.

Seven: A minimum of 496 extra houses in Trimley St Martin will generate and extra 2,500 weekday traffic movements on an already busy High Road. Add a further 2,500 traffic movements from the minimum of 500 extra houses proposed for Trimley St Mary and Walton and traffic congestion along the whole length of the High Road will become considerably worse. Current traffic pinch points at Seamark Nunn, RS McColls and elsewhere could become even more dangerous than they already are.

Eight: Little thought seems to have been given to the provision of extra primary school places which will be required in both Trimley Villages from a minimum of 996 extra houses.

Nine: Little thought seems to have been given to the provision of extra medical facilities which will be required from a minimum of 996 extra houses / over 2,000 extra people in both Trimley villages, as well as elsewhere on the Colneis Peninsula. For example, the Grove Surgery is already so short of doctors that appointments can now only be made on the day, and it is not uncommon for all appointment slots to be fully booked by 8.20 am. The situation will only be acerbated by a minimum of 1,810 houses / over 3,600 extra people on the Colneis Peninsula.

Summary:

When housing numbers are mentioned in the Felixstowe Peninsula Area Action Plan they are usually prefixed by the weasel words "a minimum". Therefore, so far as Trimley St Martin is concerned, there will be a minimum of 70 houses opposite the Hand In Hand and a minimum of 330 houses at Howlett Way. Add the 66 houses currently being constructed at the Mushroom Farm and this will give a minimum of 496 extra houses in the village. There will also be a minimum of 1,810 throughout the Colneis Peninsula.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7259 - 3934 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7259 Object

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: Mr & Mrs Williams [3934] Agent: N/A

Full Text: Preferred Options Public Consultation Response form

*Do you think that the Council has selected the most appropriate preferred options?

- * Are the policy requirements justified and do they meet the needs of the local community?
- * Can you suggest a more suitable approach than that outlined?
- * Are there any other alternative options that need to be considered?
- * Do you agree with the findings of the sustainability appraisal assessments undertaken?
- * Do you have any other comments on the preferred options documents?

Please indicate to which document your comments relate to?

Felixstowe Peninsula Area Action Plan

Your comments:

*Do you think that the Council has selected the most appropriate preferred options? In short, sorry, but No...

Although one or two small scale sites within the town and Thurman's lane (ref 383f &451f)would seem to be logical extensions of existing past development which, with suitable precautions discussed later, could be seen as acceptable use of land, the three preferred options for the Trimley villages and Walton will fundamentally change their characters.

There are several views, (Vistas if you like) clearly seen as you walk or drive around the area, that positively `define` the demarcation of these three distinct communities.

These demarcation, `vistas, ` can be seen, from the high road, the A14, or both.

If the preferred options, shown are used, then these demarcations and vistas will be lost forever, and a homogenised sprawl, from the sea, to the very edge of the Trimley's will be inevitable.

With further likely expansion taking place during the next stage (2027) there is a high probability that any remaining gaps will be `filled in,` as the precedent will have then been established.

I have indicated these vital sightlines on the modified map at the end, along with possible alternative and equivalent sites I refer to the preferred options (PO)

- 1) for land off Howlett way ref 451c &451d
- 2) land North of High Street, Walton ref 451g
- 3) land opposite Hand in Hand public house ref 451b
- 4) land North of Conway close ref 502e

1)

the SE view from Howlett way looking towards Felixstowe, across agricultural land gives a clear separation, from the substantially developed estates on the other side of this road, looking NW.

This is further reinforced by the view SW across to the Orwell, Albeit, at this stage, outside the red boundaries but in 2027, that too, could change?

The ongoing `Mushroom farm` development, has happily not significantly spoiled this perception of open countryside. This PO area, surrounded by footpaths, is extensively used by local residents of both communities, for horse riding, dog walking, and rambling, precisely` because`, the area, is, undeveloped.

Substantial bird and wildlife thrives within the area and is a valued resource for enjoyment.

A similar area could be produced, if the boundaries were extended north, to the other side of the A14 (shown on modified map - see attached document) that would prevent coalescence along the high road and reduce traffic impact, along the high road substantially, as easy access to A14 is possible.

2) Land North of High Street, Walton ref 451g

The wide demarcation of Walton and Trimley St Mary, is clearly seen and felt, when looking north from the high road, but hardly noticeable (due to banking), when looking South from the A14/A15d.

If this PO is used, Walton will simply merge into one with Trimley St Mary..... Especially as it is opposite an existing, approved planning application for a large development, the result ... Horrible!

However along the N boundary a smaller `strip` development could, with good tree screening, and substantial setback, still not affect this natural gap too profoundly, giving say 200 -300 homes?

Again the land north, on the other side of the A14 would give a similar area and have easy access onto the roundabout,

Again the land north, on the other side of the A14 would give a similar area and have easy access onto the roundabout, still leaving good vistas from the road as shown on my modified map [see attached document].

3) Land opposite Hand in Hand public house ref 451b

The spectacular views, looking South across the country side from the` Hand in hand` area, will be destroyed even if only a single frontage was permitted, and of more concern `allow` an entirely feasible, further expansion to the railway in 2027, once the excursion across the high road is established.

Although fortunately in this case, it would not 'link' two separate communities, just extend one.

However, if the area NE, and opposite Goslings farm were to be used, a similar area with good access would be available, without extending the extent of the village inordinately?

4) Land North of Conway close ref 502e

The other preferred option north of Conway close, looks innocent enough, until again, it is realised that adjacent land to the East, has already been granted planning permission, so the `white` area is somewhat misleading, as that

O - 7259 - 3934 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7259 Object

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

development has already removed the view for the existing residents.

But it use would not appear to coalesce any discreet areas, as 1) and 2) do, so like 3) is mainly the expansion of an existing community.

The two 'orange' areas of no permitted development, are certainly needed.(and appreciated)

Of concern however, is once the preferred options are established, it takes no great stretch of imagination to surmise that these two areas of `no development` will be the next to be `filled in` when the AAP is reassessed in 2027.

If that were to take place, any pretext of individual villages and communities would then be farcical.

If alternative options could be chosen, either as suggested or elsewhere by yourselves, it would be far less likely that everything could be amalgamated later.

- * Are the policy requirements justified and do they meet the needs of the local community?
- * Can you suggest a more suitable approach than that outlined?
- * Are there any other alternative options that need to be considered?
- * Do you agree with the findings of the sustainability appraisal assessments undertaken?
- * Do you have any other comments on the preferred options documents?

The other questions posed above require, I feel, a slightly different approach and response.

I have read through countless documents, counter arguments and counter proposals, about the need for this many homes, employment, infrastructure etc, from 2009 until 2012 when the basic framework was established by the government/local government.

These discussions were far more eloquently expressed by the S.T.A.G (Save Trimley Against Growth) and N.A.N.T. (No Adastral New Town) representations, than I could possibly achieve, and yet failed to modify the `official` stance.

Therefore I feel the above battles have been fought and lost long ago, and now we are at the `Damage limitation` stage of the proceedings, although hopefully this will nonetheless be productive.

Similarly the sustainability assessments, apart from being largely unfathomable, use criteria that will always be subjective, and can be `adjusted` to suit the needs of the chosen decision.

These 'battles' have likewise, been argued over and lost long ago.

Finally, It would be naive, not to perceive the hand of Trinity College in all of this, especially since their `Vision` of `their` land was published a few years back, and their `influence` when attempting to realise the maximum return for the land, with no real empathy for everyone affected.

This at least leaves us with at least the possibility of 'tinkering' with the preferred options, using yourselves, as our 'voice' and 'buffer' to make these decisions slightly more 'palatable' to all of us who 'will' be affected.

Therefore my next section will be on those preferred options but here is my take on the areas which may affect less people, but the land may not be that (cynically) chosen by Trinity College.......

[see attached document]

Site Allocations and Area Specific Policies

* Do you have any other comments on the preferred options documents?

As mentioned under my comments on the Felixstowe Peninsula Area Action Plan, I am assuming those options, will now likely go ahead regardless, and we are in a sort of 'damage limitation' stage?

The preferred options for land off Howlett way ref 451c &451d

I know well the cliché "Not in my backyard" but in this instance it `IS` very much in our backyard, and obviously we/all, the existing tenants who are affected, have a vested interest, especially as we have `in` vested` considerable money and time to live here, and for all the qualities of life, it provides.

Equally, for all my working life, my career was in the building industry, including design and planning, before finally teaching it to HNC level. Therefore I do know, that a well thought out development, can work, and work well, and executed sensitively, need not unduly destroy an area.

So what were the reasons we chose to live here, and what features need to be protected, so that many more can share and enjoy this resource, should they soon live here, with ourselves...?

Well the area where we live has some wonderful and surprising features, which make it, just what it is... Simply put, it is pure Countryside.....

Entering from the high road, and within barely 10m of walking down Thurmans, or Church lane, you immediately disappear into an archetypical `English` setting, unspoilt in a hundred years as evidenced by photos. Leaves and mud on the road greet you as you walk down. The bustle and noise fade rapidly away, and then you emerge into a 100 acre field where fox and rabbits play.

A rich variety of birds sing in the foliage and crops. You give a greeting to a horse and rider, then a walker, for there are many.. Traffic although near, sounds distant, and fails to spoil the setting.., you can enjoy the big skies, with its sunrises and sunsets, or If you chose `Dark` starry nights, with owls, and fox's cries, and distant lights through the rustling trees......,

O - 7259 - 3934 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7259 Object

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

All this, within the boundaries, of three busy roads. A true haven of peace within....

Any future development should endeavour to preserve all of this, especially for the existing tenants, and by incorporating such features, it would surely benefit any new dwellers life too, even if only at its peripheries, for then, they too, could walk with ease into this time warp or jet off down the A14 to town as is their choice, as we do.

There are also two, one hundred year old oaks in the centre that do not appear to have TPOs on them, but would surely be an asset within an open area for the development?

Likewise, a 1940s WW2 `pillbox` remains that should be preserved for posterity, and could easily become a feature within a development, either as a viewing platform (it has steps to a walled roof as it was also an anti aircraft position) or like the control tower at Martlesham Heath, a heritage site with information displays and focus of a park area.

My modified map [see attached document] shows some ideas that could help achieve this, but the simple principals are, to shield old from new, by leaving a broad band of untouched land (say 15m) around the boundaries with a screening of trees, that would preserve countryside views from both sides, and leave all the above, for all to enjoy.... Oh, And soft street lighting PLEASE, for preserving the dark night skies...Most planners, forget that, important feature of the `countryside`

It is paramount (and very much appreciated) that both Church lane, and Thurman's lane, are to be classified as `protected` lanes, and not to be used for access, to any new developments.

These peaceful routes provide part of that countryside experience. Please, cast this decision irrevocably in Stone. Any increase in (vehicle) traffic would destroy them.... Walkers and cyclists welcome...

The orange area to be protected from any developments is also vital to preserving this encircled haven of our countryside, so easily accessible from both Trimley villages.

It will also maintain that important historical separation of them.

Finally, the protected area should, provide an alternative home for the displaced, birds and wildlife, especially if several dead trees are replaced and give that haven of tranquillity for them within, for all of us to enjoy.

Thank you for protecting it, But again, please cast it in stone for all perpetuity, as it is only too easy to `fill it in later`, with the loss of all of the above.

[see atached document for revised maps of following:]

Land off Howlett way ref 451c &451d Land south of Thurmans Lane Ref 383f & 451f

This development, like Howlett way above, will affect existing tenants on three side. But with similar peripheral treatment of screening trees and scrub type band, will again separate both new and old from both directions.

Not allowing Thurmans lane to be used for access will preserve the `haven` of timeless countryside within the orange protected zone for both communities and indeed forms a circular route for both Trimley's

Land North of High Street, Walton Ref 451g

This area provides a clear division between Walton and Trimley St Mary, when looking North from the high road, but barely visible from the A14 /A15b

As this must also be taken in conjunction with the approved development opposite behind Walton hall, it would seem imperative to keep any development screened from the high road.

The old stables and Dutch house, will help this illusion, but need to be extended along the entire High Road frontage, with a decent `set back` to a solid new tree line.

And now to another `vested interest....

The need to have the rifle club relocated before any development can continue (Para 3.27)

Could easily be made redundant, if the club could remain where it is. The club has no desire to move.

It would also provide the buffer mentioned in Para 3.29 and is a natural visual break along with the old stables for demarcation of the areas

Any possible noise issues could be solved with banking and/or trees as with the accepted C13/0967 planning application for elsewhere

For the developer, the small loss of building land would be offset by the ability to start work forthwith. The club has a strong affiliation with Mencap, RNIB and national sports bodies, a real asset to the local populace, that could easily disappear if evicted, as we are never likely to raise enough money to do so..

[see atached document for revised map of following:]

Land North of High Street, Walton Ref 451g

Sunday market site sea Rd ref 1011c

O - 7259 - 3934 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7259 Object

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

Although not part of the argument for preserving historic `vistas`(indeed it was once a building)

the choice to develop the Sunday market will deprive the town of one of its significant venues, for tourism, and used by hundreds of local and outside visitors.

The surrounding retailers will undoubtedly lose a significant amount of passing trade and helps keep this area `alive` and clearly part of the tourism area (Para 6.22)

I can find no mention of a similar, alternative site.

[see atached document for photographs of following:]

Havens of peace within Land off Howlett way ref 451c &451d Looking due south from drain and the old Rectory Northern boundary Possible viewing point on 1940s pillbox and the old oaks looking North End of Church lane looking North..wildlife & tranquillity reign within three busy roads

NB unploughed borders are the suggested 15mtr `No man's land Buffer zones

Summary: This PO area, surrounded by footpaths, is extensively used by local residents of both communities, for horse riding,

dog walking, and rambling, precisely `because`, the area, is, undeveloped.

Substantial bird and wildlife thrives within the area and is a valued resource for enjoyment.

A similar area could be produced, if the boundaries were extended north, to the other side of the A14 (shown on modified map) that would prevent coalescence along the high road and reduce traffic impact, along the high road

substantially, as easy access to A14 is possible.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Preferred Options Public Consultation Response form.pdf

C - 7296 - 1841 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7296 Comment

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: Mrs Rosemary Gitsham [1841] Agent: N/A

Full Text: Have noticed that what you describe as "The Old Rectory" Church Lane is not actually the correct building. The right

one is on the other side of Church Lane, now known as Sevenoaks. The one you show is relatively modern and not

listed as far as I know.

Summary: Have noticed that what you describe as "The Old Rectory" Church Lane is not actually the correct building. The right

one is on the other side of Church Lane, now known as Sevenoaks. The one you show is relatively modern and not

listed as far as I know.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified Non

C - 7311 - 3949 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7311 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: Pigeon Investment Management Ltd [3949] Agent: Strutt & Parker (Mr Richard Clews) [3945]

Full Text:

1 INTRODUCTION

- 1.1 This representation has been prepared by Strutt Parker LLP on behalf of Pigeon Investment Management Ltd in respect of land at Trimley St Martin, Alternative Option Site 3022a in response to the six week public consultation (19th October 2015 to 30th November 2015) on the Felixstowe Peninsular Area Action Plan, Preferred Options Document, hereafter referred to as the Felixstowe Peninsular AAP. It should be read in conjunction with the following documents copies of which are contained within the appendices and summarised in the delivery statement section of this consultation response below:
- * Site Plan;
- * Indicative Layout Plan;
- * Preliminary Drainage Appraisal October 2015;
- * Desk-based Archaeological Assessment;
- * Landscape and Visual Assessment;
- * Preliminary Ecological Appraisal; and
- * Transport Report
- * Phase 1 Contamination Report

2 EXECUTIVE SUMMARY

- 2.1 As set out in these representations there are some fundamental concerns regarding the soundness of the Felixstowe Peninsular AAP and the Area Specific Policies Development Plan Document (DPD). These relate specifically to the approach adopted and the plan's failure to allocate suitable sustainable sites to address the issues arising from the failure to clearly identify up to date objectively assessed housing need for the District. There appears to be a conflict with Policy SP2 of the Core Strategy (2013) and the requirements of the National Planning Policy Framework(NPPF).
- 2.2 In respect of the Felixstowe Peninsular AAP, at a site specific level, the concern is that the plan fails to take the opportunity to allocate additional land at Trimley St Martin in accordance with the development strategy set out in the adopted Core Strategy. The site in question, Alternative Option Site 3022a, was identified as suitable in the SHLAA 2014.

It is sustainable, available and deliverable. It would represent a logical extension to the physical development limits of the village. In accordance with the presumption in favour of sustainable development and the need to boost significantly the supply of housing it is contended that it should be included as a Preferred Allocation.

3 POLICY BACKGROUND

- 3.1 The Site Allocations and Area Specific Policies Development Plan Document Preferred Options Consultation Document, October 2015 has been published for public consultation along with the Felixstowe Peninsular AAP. These two documents seek to provide the policies and allocations necessary to implement the strategic policies set out in the Suffolk Coastal District Local Plan Core Strategy and Development Management Policies, July 2013 document. Together the Core Strategy, Site Allocations and Area Specific Policies Document and the Felixstowe Peninsula AAP will form the Development Plan for Suffolk Coastal District Council.
- 3.2 While this representation relates to the Felixstowe Peninsular AAP preferred options document and more specifically proposed allocations in the village of Trimley St Martin, it also has to be considered in the wider context of the planning policy framework for the whole of the District.

4 NATIONAL PLANNING POLICY FRAMEWORK

- 4.1 Paragraph 14 sets out that "a presumption in favour of sustainable development" is at the heart of the Framework and describes this as "a golden thread running through both plan-making and decision taking." It goes on to state that for plan- making this means:
- * "Local planning authorities should positively seek opportunities to meet the development needs of their area;
- * Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change..."

These requirements are repeated in more detail throughout the Framework. Paragraph 15 requires the presumption in favour of sustainable development to be applied to local plan policies so that development which is sustainable can be approved without delay.

- 4.2 The Core Planning Principles set out at paragraph 17 include a set of overarching objectives which should underpin plan making. Of particular relevance to this consultation response are that planning should be:
- * plan-led with up to date plans providing a practical framework for predictable and efficient decisions.
- * Not be about scrutiny but be a creative exercise.
- * Proactively drive sustainable development to deliver the homes the country needs.
- 4.3 Every effort should be taken to objectively identify and meet the needs of the area. Sufficient land suitable for development having regard to market signals should be
- 4.4 Paragraph 47 sets out a clear challenge to local planning authorities "to boost

significantly the supply of housing..." In order to achieve this they should ensure

that their Local Plan meets the full objectively assessed needs for the area and they should identify and annually update their five year housing supply.

4.5 For plan-making paragraph 151 advises that Local Plans should be consistent with the policies and principles of the Framework, "...including the presumption in favour of sustainable development."

C - 7311 - 3949 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7311 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

- 4.6 Paragraph 154 requires Local Plans to be "...aspirational but realistic" and paragraph 159 reminds local planning authorities that they "...should have a clear understanding of housing needs in their area."
- 4.7 Finally, for a local plan to be found sound at examination by an independent inspector the Framework at paragraph 182 advises that it should satisfy the following tests, namely that it is:
- * "Positively prepared the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- * Justified the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- * Effective the plan should be deliverable over its period and based on effective joint working on cross- boundary strategic priorities; and
- * Consistent with national policy the plan should enable the delivery of sustainable development in accordance with the policies in the Framework."
- 4.8 For the purposes of this consultation it is necessary to consider whether the Felixstowe Peninsular AAP satisfies the above objectives.

5 APPROACH TO HOUSING GROWTH

Core Strategy

5.1 At the strategic level housing numbers and distribution are set out in the Core Strategy.

Objective 2 states:

"To meet the minimum locally identified housing needs of the district for the period 2010 to 2027, taking into account existing and future economic,

environmental and social opportunities and constraints'

In respect of this objective there are two important points to note. Firstly, that the Core Strategy seeks to meet the minimum locally identified housing need, and secondly, that it is a locally identified housing need for the plan period. 5.2 However, it is considered given the acknowledged short fall that the DPD and AAP should be based on the NPPF principles set out above including; to be aspirational; provide flexibility; positively seek to meet identified needs; and most importantly, to significantly boost housing supply. It is therefore considered that the Felixstowe Peninsular AAP should be setting its own, up to date and ambitious objectives.

- 5.3 Core Strategy policy SP2 sets out housing numbers and distribution. However, policy SP2 notes that provision will be made for at least 7,900 new homes, distributed in accordance with the settlement hierarchy set out in policy SP19. The policy then goes on to commit to an early review in order to identify the full objectively assessed housing needs for the District, to ensure this is met in so far as this is consistent with the policies of the NPPF.
- 5.4 The Inspector's report in respect of the Core Strategy Examination (June 2013) made it clear that an early review was essential as at the time the Council had identified an objectively assessed need of 11,000 dwellings. At paragraph 46 of the Inspector's Report he commented:

"Even if the theoretical capacity of all the sites included in the Strategic Housing Land Availability assessment (SHLAA), existing commitments potential brownfield opportunities, allocations carried forward from the previous Local Plan and a windfall allowance were taken into account, the provision would fall some way short of the 11,000 dwellings required."

5.5 At this point, the Inspector clearly gave consideration to suspending the Examination. However, he concluded that as none of the adjoining Councils had objected to the scale of housing proposed, that having a core strategy in place with an early review would be preferable to the alternative of suspension of the examination and the likely withdrawal of the plan.

5.6 While it is noted that the Site Allocations and Area Specific DPD Issues and Options consultation commenced in 2015, it is of significant concern that this occurred ahead of the objectively assessed housing needs for the District being reviewed, updated and firmly established. Policy CS2 states:

"An early review of the Core Strategy will be undertaken, commencing with the publication of an Issues and Options Report by 2015 at the latest. The review will identify the full, objectively assessed need for the District and proposals to ensure that this is met in so far as this is consistent with the policies in the National Planning Policy Framework."

5.7 On the basis of the currently available information the Felixstowe Peninsular AAP and the DPD are inconsistent with this adopted policy, and paragraph 158 of the NPPF which requires that the Local Plan is "...based on adequate, up-to-date and relevant evidence..."

5.8 Table 3.1 of the Core Strategy references the need for an extra 11,000 dwellings as identified in the work commission by Oxford Economics (OE) in 2010. It goes on to suggest that the review should identify land to meet the current acknowledged shortfall between the locally assessed requirement and the OE objectively assessed need (OAN). However, the District still does not appear to have a published understanding of its current OAN. The OE figure of 11,000 dwellings is very old and predates the NPPF. As advised in Planning Practice Guidance regarding housing need assessments, the household projections published by the Department for Communities and Local Government provide the starting point estimate of overall housing need (ID: 2a-015-20140306). The DCLG estimate may require adjustment to reflect factors affecting local demography and household formation rates. However, the Sub National Household Projections (2015) suggest a growth of 8,362 for the period 2010 to 2027 and this is not

referenced in the SAASP document or the AAP. This indicates that the Core Strategy figure promoted in the SAASP is out of date. While the DCLG figure is lower than the OE figure, it is clear that the Core Strategy proposal to provide 7,900 homes is lower than the most recent projections that the Council should be considering as a starting point for

C - 7311 - 3949 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7311 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

understanding its OAN. On the basis that the 2010 OE figure was 11,000, the reality is that the actual objectively assessed need figure is likely to be higher than 8,362 and that 7,900 would fail to meet the OAN.

5.9 Policy FPP1 of the Felixstowe Peninsular AAP gives the impression that it is still working to the Core Strategy target of 7,900 and does not explain if it is actually working to the OE figure or some other estimate and if so what that actually equates to for the AAP. On this basis there must be a concern that at examination the Felixstowe Peninsular AAP will not be found to comply with the tests set out in paragraph 182 of the NPPF, failing all the tests.

Five Year Housing Supply

5.10 In June 2015 Suffolk Coastal District Council published a Housing Supply Land Assessment. This covers the period 1st April 2016 to 31st March 2021 and identifies the current position with regard to identifying a five year +5% supply of housing land which it assess as 5.12 years.

5.11 Paragraph 3 acknowledges the supply in 2014 was 4.3 years this is a figure which has been borne out in appeal decisions as recently as September 2015

(APPJ3530/A/14/2225141). Fundamentally, the current assessment is still based on the Core Strategy target of 7,900. As set out above, this is an acknowledged under estimate of the actual objectively assessed need, which in the absence of anything more up to date, on the best available evidence suggests a target in the region of 11,000 dwellings. 5.12 In addition, it is also observed that the projections contained in table 3 still appear to rely on the early unconfirmed delivery of some large developments with outline permission which are still subject to S106 agreements. Taking these factors into consideration the five year supply with a modest surplus of 0.12 years, must reasonably be considered vulnerable to challenge at this time. If the 11,000 dwelling figure or even the lesser DCLG Household projection of 8,362 are applied then a five year supply in all probability does not actually exist and is at best 4.75 years.

5.13 Again, this point suggests that the Felixstowe Peninsular AAP will struggle to

demonstrate compliance with paragraph 182 of the NPPF at examination and reinforces the need to allocate additional land within the AAP.

Felixstowe Peninsular AAP

5.14 The overall spatial strategy set out in the Core Strategy (see policy SP2) provides for development to be focused in the Eastern Ipswich Plan Area, at Felixstowe and the Trimley Villages and shared between the market towns. Policy SP19 identifies that Felixstowe, Walton and the Trimley Villages will accommodate a proposed housing growth of 22%. Furthermore the Strategic Housing Land Availability Assessment (March 2014) acknowledges:

"The core Strategy expects the Market Towns and the Felixstowe and the

Trimleys area to accommodate a considerable proportion of the growth identified for the district to 2027".

5.15 The Felixstowe Peninsula AAP in policy FPP1 identifies a minimum requirement for a further 807 units before 2027 as necessary to meet the Core Strategy requirement. However, as previously mentioned above these figures are a minimum and the AAP should be seeking to maximise delivery in sustainable locations in order to boost significantly the supply of housing as required by the NPPF. It is therefore contended as set out in more detail above, that policy FPP1 should be setting a more ambitious target, and in the absence of any more recent objectively assessed need, looking to a District target of 11,000 dwellings rather than the 7,900 derived from the Core Strategy. Policy FPP1 should therefore be reworded to identify a higher overall target and as such an appropriate apportionment, for Felixstowe Peninsular. 5.16 It must be acknowledged that the AAP states at paragraph 3.13:

"The Felixstowe Peninsula AAP identifies over 1,100 units on the preferred sites outlined in this document. The Council consider it necessary to over allocate sites across the district to ensure that a five year land supply is maintained which is paramount. Over allocating also provides a range of sites, sizes and locations for development to allow a choice of location for those looking for a residential property. It also takes into account that the population is growing and that the Council's objectively assessed housing need is likely to increase in the future.

The delivery of sites will be monitored throughout the plan period to consider how the AAP is performing against the Core Strategy targets."

5.17 While this additional provision is welcome, it is still unclear if it will provide sufficient sites, which are available and deliverable, to enable the District to demonstrate a five year housing land supply in the short term. The current five year supply is not based on an up to date objectively assessed need. It is therefore contended, that opportunities should be taken to allocate more sustainable sites that can be delivered in accordance with Core Strategy spatial strategy so that the District can significantly boost its supply of housing as required by the NPPF. These sites should allow for variety in house types and

tenures to come forward to meet local needs and ensure choice and competition in the market for land (NPPF paragraph 47).

5.18 From the statement in paragraph 3.13 the Council appears to be acknowledging that the objectively assessed need is rising and site allocations should reflect this. It would therefore seem logical, and in the interests of good planning, for them to plan to meet this need now, by way of the allocation of further sustainable sites.

Felixstowe Peninsular AAP Preferred Site Allocations

5.19 The Felixstowe Peninsular AAP identifies 7 sites as preferred option allocations. Two of these are in Trimley St Martin and one in Trimley St Mary and are identified on the inset maps in the AAP. A summary of the 7 sites is set out below along with some brief summary observations in italics which are considered relevant to this consultation response: 5.20 Preferred Policy FPP3: Land at Sea Road, Felixstowe

Land is identified at Sea Road, Felixstowe for a mixed use development of commercial /tourism uses and residential dwellings. (Indicative Capacity 40 dwellings)

C - 7311 - 3949 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7311 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

It is noted that this is a mixed use site and residential development will be dependent on

There is also an issue with sewage capacity which may impact on viability. Finally if the market has to be relocated this could also significantly delay delivery.

5.21 Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

Land is identified north of Walton High Street for a mixture of residential units; including on site open space,

comprehensive landscaping and new business units. (Indicative Capacity 400 dwellings)

This site is dependent on the Rifle Club being relocated, requires a master plan to

include a link road which could in turn impact on viability. The policy acknowledges that it is likely to be a longer term opportunity. There are also air quality and sewage capacity issues to be resolved.

5.22 Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Land is identified to the north of Conway Close for a residential development. (Indicative Capacity 150 dwellings) The site could come forward, however, there are still sewage capacity and air quality issues to be addressed and the site is adjoined by heritage assets.

5.23 Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St

Martin Land is identified on Trimley High Road for residential development with on site open space to provide a village green. (Indicative Capacity 70 dwellings)

The site could come forward with access on to the High Street. The Public House is a listed building and therefore development proposals will have to be sensitive to its status which may limit capacity.

5.24 Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

Land is identified at Howlett Way for residential development with on site open space. (Indicative Capacity 360 dwellings)

Access to the site has not been identified in detail other than off Howlett Way. There are air quality issues and concerns regarding the setting of the Old Rectory. In addition there is a water main crossing the site. The site wraps round the Old Poultry Farm and the Old Rectory both of which may delay availability.

5.25 Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

Land is identified south of Thurmans Lane for residential development. (Indicative

Capacity 100 dwellings)

This site could come forward, again it is subject to air quality issues and the need to have regard to Mill Farm a Grade II Listed Building, it will also have to be accessed through the adjoining residential areas.

5.26 Preferred Policy FPP9: Land at Bucklesham Road, Kirton

Land is identified south of Bucklesham Road for residential development. (Indicative Capacity 15 dwellings)

This is a relatively small ribbon development site which could come forward. There are potentially issues to be resolved in respect of local sewage capacity in the village.

Assessment of Preferred Allocations

5.27 If the preferred site allocations indicative capacities are totalled up cumulatively this suggests they could deliver 1,135 dwellings between them. However, as set out above the delivery, and more importantly, the quantum and likely timing of delivery is much less certain. It is noted that the two largest sites, FPP8 and FPP4 do not appear to be very advanced. With this in mind in order to maintain a realistic five year supply it will be important for the District to maintain the delivery of smaller sites which can readily come forward.

6 ALTERNATIVE OPTION SITE 3022A

6.1 The site the subject of this representation, Alternative Option Site 3022a is just such a site and accordingly it is contended that it should be included as a preferred allocation on the basis that it is available and deliverable at the present time. In addition, it does not need to overcome the issues and constraints associated with some of the preferred allocations set out above and as such can contribute to the acknowledged shortfall in housing need, within the first five years of the Plan period. It is also contended that the AAP should be more ambitious in order to meet local housing need and it would be appropriate for the site to be included based on the presumption in favour of sustainable

6.2 When considering the Trimley Villages and the opportunities for further allocations, Trimley St Mary is the larger of the two settlements and any significant further expansion may potentially undermine the sustainability of it as a village. Trimley St Martin being the smaller of the two settlements would appear to have greater capacity to absorb further growth. Trimley St Mary is also constrained by its proximity to Felixstowe, the ANOB designation to the south-west, the A14 to the north-east and its proximity to Trimley St Martin to the north. There are therefore few obvious alternative locations for the expansion of its physical development limits. On this basis, there is considerably more potential to be looking at a further extension of the physical development limits of Trimley St Martin.

6.3 In so far as this consultation is concerned, clearly a further allocation on the northwestern side of Trimley St Martin would make a positive contribution towards housing delivery. Alternative Option Site 3022a is in a sustainable location and is not environmentally sensitive. It does not represent a risk of coalescence and is a natural and logical extension of the settlement with clear and defensible boundaries. It is contained to the north-east by the allotment gardens, by the existing built development in the western corner, the road and established settlement to the south. As set out below it is a deliverable site with no obvious constraints or limitations. It is available and could come forward very quickly to make an almost immediate contribution to boosting local housing supply. As such, it is considered that it should be identified as a preferred

residential site allocation.

Sustainability Appraisal

6.4 It is surprising that Alternative Option Site 3022a did not score more highly in the Preferred Options Sustainability Appraisal when compared to the preferred sites listed above.

C - 7311 - 3949 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7311 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

6.5 The overall assessment concluded for site 3022a as follows:

"The site scores well in terms of economic effects due to its close proximity to employment opportunities and given relatively good public transport provision. The loss of Grade 2 agricultural soil results in a major negative environmental effect. However, there may be scope for mitigation."

6.6 In response to the major negative environmental effect of using Grade 2 agricultural land, it is clear that there is no difference with the conclusions for a number of preferred allocations. The proposed site is on the boundary of grade 2/3 agricultural land. All undeveloped and proposed allocation sites within Trimley St.Mary and Trimley St.Martin are on Grade 2 Agricultural Land. The proposed site is therefore no more important for protection as agricultural land than the allocated sites and may in fact be less desirable due to the size of the site and the overall quality. One of the objectives where the site did not score very favourably was in respect of SA Objective 8, to improve the quality of life and where people live. The SA comment here incorrectly assumed that the site will be accessed via the adjoining estate roads and as such could potentially result in a negative

impact for local residents. The reality, as set out in more detail in the delivery statement below, is that access can be provided directly on to High Road.

6.7 In respect of the site assessments and commentaries for the preferred allocations set out in the AAP, there appear to be a number of reoccurring themes which do not necessarily appear to be reflected in the sustainability appraisals. These are as follows:

Air Quality: This is clearly an issue with air quality assessments being required for the majority of the preferred allocation sites. This is an issue, particularly associated with proximity of the sites to the urban area of Felixstowe and major transport routes including the A14. In respect of the majority of the preferred allocations, and in particular the largest sites, these are more closely related to the A14 and Felixstowe than Alternative Option Site 3022a. As such, simply on the basis of the degree of separation, it can be concluded that site 3022a will perform better in respect of air quality.

Sewage Capacity: Sewage capacity is an issue raised by Anglian Water in respect of the Felixstowe sites and the site in Kirton. These sites potentially require improvement to the capacity of the foul sewer network. This does not appear to be an issue for the Trimley Villages and as set out in the delivery strategy below a preliminary foul and surface water drainage strategy has already been prepared for Alternative Option Site 3022a.

Noise: The potential impact of noise does not appear to have been given much consideration. It should be noted, that some of the preferred allocations lie adjacent to junctions on the A14. These sites or parts thereof may be susceptible to noise disturbance which may require mitigation and/or potentially reduce the developable area. Alternative Option Site 3022a, lies to the south of the A14 separated by the established allotment gardens and as such is unlikely to be adversely affected by noise from the road.

Transport Assessments: The larger preferred option allocations will require transport assessments to be carried-out. These may potentially reveal highway safety or capacity issues which could impact on the quantum of development achievable and delay delivery. This would not be necessary with the scale of development proposed on Alternative Option Site 3022a.

Heritage Assets: A number of the preferred option sites have a close relationship with existing heritage assets. In some cases the SA scored these relationships to be positive on the basis that the setting may be improved. It does not necessarily seem reasonable that a site that will have an impact on heritage assets should score more highly than one where heritage assets are unaffected as is the case with Alternative Option Site 3022a.

6.8 In conclusion it is clear from the above that Alternative Option Site 3022a has many advantages over some of the preferred allocation sites and there are no obstacles to it coming forward for development. It is in a sustainable location and could readily deliver much needed housing, including affordable housing, a significant social benefit, with very limited environmental consequences. This assessment further supports the case that it should be included as a preferred allocation.

Deliverability

6.9 Trimley St Martin lies to the west of Felixstowe, between the A14 to the north-east and the railway line to the south-west. The village of Trimley St Mary lies immediately to the south east separated by a small gap. The 2011 Census reported the population of Trimley St Mary as 3,673 and the population of Trimley St Martin as 1,932. The two villages are immediately adjacent to Felixstowe and identified in the Core Strategy as Key Service Centres due to their extensive range of facilities and proximity to Felixstowe.

6.10 Alternative Option Site 3022a, is situated on the north-western side of the village. It lies to the east of High Road, which runs parallel with the A14, connecting Felixstowe via the A1156 to Ipswich. The south-eastern side of the site abuts the residential properties of Mill Close with extensive allotment gardens lying to the north-east. The western corner of the site contains a group of existing dwellings and buildings used for commercial purposes. Beyond the site to the north-west are arable fields.

6.11 The site was in part submitted and considered under the SHLAA 2014 (site 383a) it was discounted due to concerns regarding vehicle access. Mill Close was not considered to be suitable as an accesses route and the Highway

C - 7311 - 3949 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7311 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

Authority was not in favour of direct access from High Road.

6.12 Since 2014 extensive work has been undertaken by Pigeon Investment Management Ltd to overcome the concerns relating to access and demonstrate the sites deliverability. A summary of the work to date is set out below which demonstrates the site's deliverability.

Indicative layout plan

6.13 An indicative layout plan, drawing number 015 - 015 - 00 has been prepared for the site (see Appendix). This shows how the site could be developed to deliver a range of house types including 18 affordable units. The proposed layout demonstrates that the site can deliver housing which respects the surrounding pattern of development. A strong frontage along high Road will provide a connection between the existing settlement and the group of existing buildings to the west of the site. This will be focused around the new highway access which will create an attractive and framed entrance into the development. The internal layout picks up on pedestrian connectivity through to Mill Close providing some additional frontage plots in the eastern corner of the site.

Elsewhere the proposed dwellings and street layout seeks to extend the established pattern of buildings along the site boundaries. Open space and gardens are provided along the north-eastern boundary in order to respect the presence of the allotment gardens. A large area of open space to serve the development (and the existing village) is proposed to the north which will provide a sensitive edge and integration with the open farm land beyond.

6.14 The layout demonstrates that an appropriate density of development can be provided along with a range of house types. The proposed layout can also meet garden space requirements and parking provision while respecting the amenities of adjoining residential properties.

Affordable Housing

6.15 The indicative layout shows the site could include 18 affordable units, including a variety of house types and sizes to meet local need. This will be a significant local benefit.

Heritage Assessment

6.16 The site does not lie with or adjacent to a conservation area and there are no Listed Buildings or other Heritage Assets on or nearby.

6.17 A desk-based assessment of archaeological significance was undertaken in November 2015. This report concludes that there is no evidence that proposed development will have any impact on the significance or setting of designated heritage assets of archaeological interest. It suggests that development could have an impact on the significance of undesignated heritage assets indicated by crop marks but that their significance is unlikely to be sufficient to preclude development and impact on them may be mitigated by the formulation of an appropriate archaeological strategy.

Flood Risk

6.18 The entire site is located within Flood Zone1; land assessed as having a low probability of flooding from fluvial sources. In addition, the site is not identified to be at risk from surface water or reservoir flooding, according to the Environment Agencies Flood Maps for Planning.

6.19 The development will not increase the risk of flooding post development as attenuation measures will be provided on site as part of the proposal to accommodate surface water run-off generated from the critical duration 1 in 100 year event, including an allowance for climate change.

Drainage Strategy

6.20 A preliminary drainage strategy has been prepared for the site which concludes that foul water from the development will be able to flow via gravity to the existing Anglia water sewer located in the High Road.
6.21 In respect of surface water drainage the underlying geology is expected to be of high permeability which will allow surface water run-off to discharge via infiltration. It identifies that an infiltration basin can be provided within the public open space to accommodate surface water run-off from the proposed highway. The surface water from roofs can be discharged via soakaways with permeable paving included to drain the private access roads, parking areas and driveways.

Landscape and Visual Assessment

6.22 A landscape and visual assessment of the site has been carried out and it concludes that there is capacity within the landscape to absorb change.

6.23 It suggest that given the nature, character and visual quality of the existing settlement edge and the poor quality of the existing edges of the site, it has a High Capacity to accommodate change, and the potential to enhance the settlement edge.

6.24 As such there are few constraints or issues in landscape and visual terms that would prevent the site being considered for development.

Preliminary Ecological Appraisal

6.25 A preliminary ecological appraisal has been carried out for the site. Ten habitats were identified during the Extended Phase 1 Habitat Survey including scattered broadleaved and coniferous trees, scattered scrub, poor semi-improved grassland, scattered bracken, tall ruderal, arable, introduced shrub, and species-poor intact and defunct hedgerows. In addition the field margins on-site provide opportunity for common invertebrates, reptiles, birds, and foraging / commuting bats. The report makes a series of recommendations in respect of mitigation measures and good practice during development however, no Phase 2 survey work was required. It is clear that there are no ecological barriers to the

sites development.

C - 7311 - 3949 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7311 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

Transport Report

6.26 A transport report has been prepared for the site which concludes that the proposed development can be served by an acceptable access to the highway network. The report confirms that the site is located in a sustainable location with bus stops on the boundary providing frequent services and footway connections to local facilities.

6.27 A new access can be provided onto High Road which complies with highway standards and provides adequate visibility and capacity. The existing local infrastructure can support the additional traffic generated, including through the use of more sustainable modes of transport as alternatives to the private motor car, such as cycling, walking and public transport.

6.28 The transport report confirms that access can be provided directly onto High Road and that it will not be necessary to take access via Mill Close as assumed in the assessment of the SHLAA 2014 (site 383a). This therefore overcomes the key reason for the site being discounted due to concerns regarding vehicle access.

7 CONCLUSION

7.1 As set out above and referred to elsewhere in this consultation response Alternative Option Site 3022a is available and deliverable. There are no obstacles to its development and clearly proposals are at an advanced state. The indicative layout confirms that a policy compliant scheme can be delivered which will include market and affordable housing, a large area of open space and improved connectivity.

7.2 As indicated in the landscape and visual assessment, the proposed development will be an attractive addition to the settlement, improving the quality of existing north western edges of the village.

7.3 The site is not in a flood risk area and can be suitably served by both foul and surface water drainage.

7.4 Development of the site will have no impact on designated heritage assets and any impact on undesignated assets can be mitigated. Additionally, there are no ecological barriers to the sites development.

7.5 The site is in a sustainable location with good access to local services and facilities. A new point of vehicle access, which accords with adopted standards, can be provided to High Road overcoming the original reason for the site being discounted in the SHLAA 2014 (site 383a).

7.6 Policy FPP1 of the Felixstowe Peninsular AAP is still working to the Core Strategy target of 7,900 rather than the 11,000 OE figure or an up to date objectively assessed need, as required by Core Strategy Policy SP2. In addition, the current five year supply is not based on an up to date objectively assessed need. It is therefore contended, that the Felixstowe Peninsular AAP should take the opportunity to allocate more sustainable sites that can be delivered in order to meet the requirement of the NPPF to "significantly boost its supply of housing" and assist in the maintenance of a five year supply of housing land.

These sites should allow for variety in house types and tenures to come forward to meet local needs and ensure choice and competition in the market for land (NPPF paragraph 47).

7.7 In conclusion, it is clear that Alternative Option Site 3022a has many advantages over some of the preferred allocation sites and there are no obstacles to it coming forward for development. It is in a sustainable location and could readily deliver much needed housing, including affordable housing, a significant social benefit, with very limited environmental consequences. It does not represent a risk of coalescence and is a natural and logical extension of the settlement with clear and defensible boundaries.

7.8 For the reasons set out above it is clear that Alternative Option Site 3022a should be included as a preferred allocation in the Felixstowe Peninsular AAP.

APPENDICES [see attached documents]

See Attachments to Representation Submission for following documents:

- A. Location Plan
- B. Indicative Layout Plan
- C. Preliminary Drainage Appraisal (October 2015)
- D. Desk-based Archaeological Assessment
- E. Landscape and Visual Assessment (November 2015)
- F. Preliminary Ecological Appraisal
- G. Transport Report
- H. Phase 1 Contamination Report

Summary:

Land is identified at Howlett Way for residential development with on site open space.

(Indicative Capacity 360 dwellings)

Access to the site has not been identified in detail other than off Howlett Way. There are air quality issues and concerns regarding the setting of the Old Rectory. In addition there is a water main crossing the site. The site wraps round the Old Poultry Farm and the Old Rectory both of which may delay availability.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Appendix E - Landscape and Visual Assessment Summary November 2015.pdf

Appendix H - Phase 1 Contamination Report (Pt2).pdf Appendix H - Phase 1 Contamination Report (Pt1).pdf

C - 7311 - 3949 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7311 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

Appendix F - preliminary Ecology Appraisal Trimley.PDF

Appendix E - FR 3659 Figure 5 Photosheets_LR.pdf

Appendix E - FR 3659 Figure 4 Landscape Charcter Assessment.pdf

Appendix E - FR 3659 Figure 2 Statutory Designations(1).pdf

Appendix E - FR 3659 Figure 1 Site Plan with Photo Locations(1).pdf

Appendix D - Trimley St Martin Desk Based Archaeological Assessment.pdf

Appendix C - Prelimiary Drainage Appriasal Oct 15 trimley.pdf

Appendix C - Prelimiary Drainage Appriasal Nov 15 trimley.pdf

Appendix B - Indicative Layout Plan (015-015-002).pdf

Appendix A - Location Plan Trimley.pdf

Appendix G - Transport Statement (November 2015).pdf

Appendix E - FR 3659 Figure 3 Landscape and Heritage Designations and Public Rights of Way.pdf

C - 7334 - 348 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7334 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

Respondent: Trinity College Cambridge [348] Agent: Bidwells (Mr Darren Cogman) [1138]

Full Text:

I write in response to the Preferred Options consultation, submitting representations on behalf of my client, Trinity College, Cambridge, in respect of the draft allocation of Preferred Policy FPP7 - Land off Howlett Way, Trimley St. Martin

Preferred Policy FPP7: Land off Howlett Way, Trimley St. Martin

Trinity College supports the proposed allocation of the above site for residential development.

The allocation of the site will make a meaningful contribution towards the pressing need for new housing across the Peninsula allied with the Council's commitment to deliver a minimum of 1,760 new dwellings in Felixstowe, Walton and the Trimley villages during the plan period (2010 to 2027) of the adopted Core Strategy.

The Core Strategy states that Felixstowe, Walton and the Trimley villages is by far the largest town within the District and includes the Port of Felixstowe, a strategic employment site, of both regional and national significance. Pertinently, it also acknowledges that the growth of jobs in Felixstowe, driven by expansion of

the Port, means that employment is now out of balance with the availability of housing. As a result, more of the new jobs are being taken up by people who are not able to find a home in Felixstowe, even if they would like one. This had led to an unsustainable increase in commuting from other towns on a daily basis. In

addition, the population in the area is increasing at the same time as average house-hold sizes are falling, further increasing the need for housing. The number and type of new homes provided in recent years has not matched this increase in demand.

The importance of boosting housing supply in Felixstowe is demonstrated by the Council's commitment (as required by the Inspector who examined the Core Strategy) to pursue an early review of the Core Strategy's strategic policies (amongst them a minimum housing requirement of 7,900 dwellings) by 2015 to address objectively assessed housing needs (Policy SP2 - Housing Numbers and Distribution). As part of the evidence base to inform the Core Strategy, Oxford Economics were commissioned (2010) to determine housing need for the District, which was established to be 11,000 dwellings at that time. It is understood that evidence gathering during 2015 indicates that the current full, objectively assessed district wide housing need could be higher still.

As such, current housing need is higher than the levels of growth currently being planned for, and more sites are likely to be required to come forward on the peninsular in the medium term, over and above those proposed for allocation via the AAP. It is, therefore, critical to make the best use of land for housing and prioritise the delivery of residential development.

The host site is one of a number identified by the Council as being suitable for residential development in its Strategic Housing Land Availability Assessment (Ref. 451c and 451d, SHLAA, 2014). My client supports the SHLAA's conclusion that the site is deliverable, being suitable, available and achievable for development within 5 years.

The suitability of the site for housing is reaffirmed by its sustainability. The Interim Sustainability Appraisal supporting the AAP consultation identifies that it scores well when considered against its social, environmental and economic effects. For example:

- The site is centrally located to the villages of Trimley St. Martin and Trimley St. Mary and provides an opportunity for organic and evolutionary growth as outlined by Core Strategy Policy SP21.
- The site is located close to a range of local services, including the Trimley Sports and Social Club, Memorial Hall, Hand in Hand Public House, and Trimley Methodist Church.
- It is adjacent to bus routes (High Road and Howlett Way) connecting the village with Felixstowe and Ipswich.
- The site will assist in the Core Strategy's aim to reduce and reverse the unsustainable patterns of incommuting to Felixstowe (the Port and its other employment areas).
- The site offers the opportunity to link to the existing Public Right of Way Network, and Bridleways Network. In essence, the collective site (incorporating SHLAA sites 451c and 451d) is ideally suited for residential development and its allocation in the AAP is entirely consistent with the Core Strategy's short to medium term objectives to deliver organic and evolutionary growth over a mixture of sites immediately abutting existing built up areas.

Amendments to Site Boundaries

Since the publication of the SHLAA (2014) and AAP Preferred Options Consultation Document, my client has also acquired a further parcel of land (0.619ha) that formed part of the Poultry Farm, as shown on the attached plan (pink area). Poultry operations have now ceased on this site, which provides the opportunity to provide an enlarged parcel of land that can be included within a wider redevelopment, as identified as an opportunity at para. 3.57 of the AAP consultation document.

The resultant site, therefore, extends to 10.64ha, rather than 10.02ha. as indicated within the AAP consultation document

It is respectfully requested that the site area of Preferred Policy FPP7 is therefore amended to reflect this.

Scale of Residential Development Required

The AAP "expects" a minimum of 360 dwellings to be delivered on the site, well above the SHLAA's collective site estimate (SHLAA sites 451c and 451d) of its maximum capacity of 240 dwellings. My client acknowledges this target and will bring forward a masterplan in the future as part of a planning application that will seek to deliver it.

Given the recent acquisition of a further 0.619ha, and the subsequent increase of the site area from 10.02ha to 10.64ha,

C - 7334 - 348 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7334 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

it is suggested that the minimum dwelling target should also increase proportionately.

Nevertheless, it is of paramount importance to ensure the delivery of high quality living environments and, ultimately, sustainable communities. It will be necessary to take other constraints into account, such as the need to respect the setting of the Grade II Listed Old Rectory adjacent the site.

These constraints could impinge the quantum of development that can be achieved, although we remain convinced that the minimum amount of dwellings expected, with appropriate masterplanning can be satisfactorily achieved.

Other Site Requirements

My client has some concern over the list of other requirements contained in draft policy FPP7 and its supporting text alongside the need to deliver a minimum of 360 new homes. The AAP makes reference to 'a need for dwellings targeted at the retirement market' within the supporting text (para. 3.59).

Paragraph 173 of the National Planning Policy Framework (the Framework) makes clear that pursuing sustainable development requires careful attention to viability and costs in plan making and decision taking. It confirms that:

"sites identified in the Plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions and other requirements should, when taking

account of the normal cost of development and mitigation, provide competitive returns to a willing landowner and willing developer to enable development to be deliverable."

The Council must be satisfied that the policy burdens it is seeking to impose on the site, in addition to the CIL charge that will apply, will not threaten its viability or deliverability. We have not seen any evidence to suggest that this has been fully taken into account.

Like most of Felixstowe, Walton and the Trimleys, the site is in an area assessed as being of "Low" land value in the evidence prepared to support the Council's CIL examination. This makes its viability particularly sensitive to policy burdens.

Taking this into account, there is a need to be realistic about what the site can deliver and to prioritise the most important objectives. We strongly contend that making the best use of the site to deliver housing and its supporting infrastructure should be the priority as a consequence of the Core Strategy's commitment to

deliver a minimum of 1,760 dwellings in Felixstowe before 2027 and the likelihood of an increased requirement within the same timescale arising from its forthcoming early review (understood to commence with a 'Issues and Options' consultation in October 2016). Seeking to deliver a range of other requirements

will only harm viability and, as a minimum, the amount of affordable housing that can be supported alongside CIL and other development costs.

Need for Dwellings Targeted at the Retirement Market (para. 3.59)

My client has no objection to bringing forward proposals which provide for a good mix of housing, including dwellings suitable for the elderly, but does object to any prescriptive requirement to provide, for example, bungalow development. Whilst there is currently no clarity regarding what 'public consultation responses

highlight a need for dwellings targeted at the retirement market' means (as there would appear to be no site specific reference within the Analysis of Responses to the Issues and Options Public Consultation Document) it is also unclear what evidence of need this requirement is based upon because little justification is provided in the draft AAP.

More importantly, the site does not have capacity (relatively limited site area) to support the development of land hungry bungalow dwellings when providing the other requirements alongside a minimum of 360 (or more) new dwellings. The implicit requirement is not deliverable, and therefore unsound. The policy wording

should be amended to clarify 'retirement market dwellings', and focus on the delivery of a high quality residential development.

Rather than any potentially prescriptive, and unachievable building forms given other competing requirements, there are other measures open to ensure that homes are accessible and inclusive, for example the concept of 'Lifetime Homes', that can provide sufficient flexibility and adaptability to support the changing needs of individuals and families at different stages of life. Moreover, taking account of the commitments set out in the Core Strategy, the delivery of housing suitable for all members of the community should be the priority for this site.

Requirement for Open and Play Space

In bringing forward any proposals for the development of this site, we are aware of the likely need to provide green open space adjacent to the Grade II Listed Old Rectory to protect its setting.

Accordingly, we would be happy to bring forward a development that addresses the Council's adopted play and open space standards set out in the Core Strategy under Policies SP16 and SP17 and the Outdoor Playing Space SPG. However, we object to the wording of point 3.61 of Preferred Policy FPP7 which states 'developers will be required to consider local needs and requirements as part of their proposals alongside the nationally published standards regarding provision.'

It is not specified what 'nationally published standards' the Council is referring to. The policy is vague and moreover it is unnecessary, since any standards set out in national planning policy do not need repeating in the AAP. My client objects to inclusion of this section of the policy because it is unclear, unnecessary and

unsound. We would encourage the Council to remove it altogether. Requirements in respect of open and play space can be secured by national planning policy, the Core Strategy and the SPG.

Requirement for an Air Quality Assessment

My client acknowledges that an Air Quality Assessment will be required to support a planning application for residential

C - 7334 - 348 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7334 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

development, as we note is being required for all Preferred Option residential sites within the Trimley villages.

Conclusion

In summary, subject to the concerns outlined, my client is supportive of the proposed allocation of the site (with the additional land as outlined) to provide new housing to assist in meeting the minimum Core Strategy housing requirements, and helping reverse unsustainable patterns of in-commuting to the Port of Felixstowe and other employment areas.

We trust that the above representations are of assistance and look forward to the Pre-Submission (soundness) consultation timetabled to commence in February 2016. In the interim, I would of course be pleased to discuss these specific representations or any other matters in respect of this site at your earliest convenience.

Summary:

there is a need to be realistic about what the site can deliver and to prioritise the most important objectives. We strongly contend that making the best use of the site to deliver housing and its supporting infrastructure should be the priority.

Subject to the concerns outlined, my client is supportive of the proposed allocation of the site (with the additional land as outlined) to provide new housing to assist in meeting the minimum Core Strategy housing requirements, and helping reverse unsustainable patterns of in-commuting to the Port of Felixstowe

and other employment areas.

Change to Plan

It is not specified what 'nationally published standards' the Council is referring to. The policy is vague and moreover it is unnecessary, since any standards set out in national planning policy do not need repeating in the AAP. My client objects to inclusion of this section of the policy because it is unclear, unnecessary and unsound. We would encourage the Council to remove it altogether. Requirements in respect of open and play space can be secured by national planning policy, the Core Strategy and the SPG.

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

S088100031 Reps Land off Howlett Way High Road Trimley St Martin.pdf

C - 7385 - 3952 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7385 Comment

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

Respondent: Anglian Water (Mr Stewart Patience) [3952] Agent: N/A

Full Text:

Thank you for the opportunity to comment on the Site Allocations and Area Policies Preferred Options Document and Felixstowe Peninsula Area Action Plan. Please find enclosed comments on behalf of Anglian Water.

Site Allocations and Area Specific Policies Preferred Options Consultation Document

Policy SSP3: Land rear of Rose Hill, Saxmundham Road Aldeburgh

Anglian Water has no objection to the proposed allocation of this site for open market housing and a care home.

Paragraph 2.28 (page 30)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.28 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP4: Land at Mill Road Badingham

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.32 (page 32)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.32 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP5: Land Adjacent to Corner Cottages, Main Road, Benhall

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP6: Land south of Brook Cottage, Benhall

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.35 (page 34)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.35 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP7: Land opposite Townsfield Cottages, Dennington

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.40 (page 37)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.40 should be amended to refer to the management of surface water run off in

C - 7385 - 3952 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7385 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

accordance with the surface water management hierarchy.

Policy SSP8: Land south of Ambleside, Main Road, Kelsale cum Carlton

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.46

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.46 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP9: Land north of Mill Close, Orford

It is expected that there may be a need for improvements to the sewerage treatment capacity to enable the development of this site.

Policy SSP10: Land west of Garden Square Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP10:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP11: Land rear of 3 -33 Suffolk Drive, Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP11:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP12: Land north-east of Street Farm

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP12:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP13: Land fronting Old Homes Road, Thorpeness

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP13:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP14: Land south of Lower Road Westerfield.

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP15: Land at Old Station Works, Main Road Westerfield

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP15:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP16: Land at Street Farm, Witnesham (Bridge)

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP17: Land south of the primary school, Witnesham

Anglian Water has no objection to the proposed allocation of this site for residential development.

C - 7385 - 3952 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7385 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

Policy SSP18: Ransomes, Nacton Heath

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP13:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP19: Land at Silverlace Green(former airfield) Parham

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required.

Therefore it is recommended that these issues are investigated further and Policy SSP19 is amended accordingly.

Policy SSP20: former airfield Parham

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required.

Therefore it is recommended that these issues are investigated further and Policy SSP20 is amended accordingly.

Policy SSP21: former airfield Debach

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required. Therefore it is recommended that these issues are investigated further and Policy SSP21 is amended accordingly.

Policy SSP22: Bentwaters Park, Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP22:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP23: Carlton Park, Main Road, Kelsale cum Carlton

Anglian Water has no objection to the proposed allocation of this site for employment development.

Policy SSP24: Levington Park, Levington

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP24:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP25: Riverside Industrial Estate, Border Cot Lane, Wickham Market

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP25:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP31: Snape Maltings

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site for arts, recreation and tourism related development. It is therefore suggested that the following text should be include in Policy SSP25:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Felixstowe Peninsula Area Action Plan Preferred Options Consultation document

C - 7385 - 3952 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7385 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

Policy FPP3:Land at Sea Road, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP4: Land north of Walton High Street, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP5: Land north of Conway Close, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is therefore suggested that the following text should be include in Policy FPP6:

'Improving the capacity of the foul sewerage network'

Policy FPP7: Land off Howlett Way, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is therefore suggested that the following text should be include in Policy FPP7:

'Improving the capacity of the foul sewerage network'

Policy FPP8: Land off Thurmans Lane, Trimley St Mary

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP8:

'Improving the capacity of the foul sewerage network'

Policy FPP9: Land at Bucklesham Road, Kirton

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Policy FPP9 refers to 'reinforcement of connections'

The term reinforcements is normally used in the context of water mains and not foul sewers when referring to improvements within the network.

It is therefore suggested that the following text should be include in Policy FPP9:

'Improving the capacity of the foul sewerage network through reinforcement of connections by making necessary improvements to ensure that capacity can be made available'

Policy FPP10: Port of Felixstowe

It is noted that it proposed to allocate land at the Port of Felixstowe for strategic employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Policy FPP11: Land at Bridge Road, Felixstowe

It is noted that it proposed to allocate land at Bridge Road for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Policy FPP12: Land at Carr Road/Langer Road, Felixstowe

C - 7385 - 3952 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7385 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

It is noted that it proposed to allocate land Carr Road/Langer Road for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP12:

'Improving the capacity of the foul sewerage network'

Policy FPP13: Land at Haven Exchange, Felixstowe

It is noted that it proposed to allocate land at Haven Exchange for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP13:

'Improving the capacity of the foul sewerage network'

Summary: It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this

site.

Change to Plan Therefore it is therefore suggested that the following text should be include in Policy FPP7:

'Improving the capacity of the foul sewerage network'

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7392 - 3883 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7392 Object

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: mr r modrzynski [3883] Agent: N/A

Full Text:

I would like to make the following comments particularly regarding the Sustainability Appraisal (SA) for the developments in Trimley St Martin (TStM) in particular but numbers of the comments also apply to sections throughout the plan for the peninsula.

The plan has many uses of the word 'likely', in my opinion and I believe in the opinion of the 'reasonable person, disingenuously.

For example to REDUCE greenhouse gases, REDUCE waste, REDUCE effects of traffic, INCREASE air quality. The process of building, occupying and maintaining these houses and sites can only INCREASE greenhouse gases, waste generation, the amount of traffic as well as many of the other factors and DECREASE air quality and wildlife habitats. The word 'likely' is completely misleading.

I would suggest that there must be some quantitative data available to demonstrate, per house occupant and/or house the lifetime environmental effects in terms of greenhouse gases, air pollution, water and waste usage etc and that this information should have been included in the plan. This would allow a quantitative assessment and avoid such nebulous terms as 'likely'.

I find the criteria on page 15 FPAAP difficult to correlate with the scoring system guidance given on pages 10 - 12. The scoring often seems to result in a favourable outcome whereas any reasonable person could not fail to see some of the glaringly obvious and significant negative effects. Many of these scores seem to have no factual bases with little or no factual information to substantiate them, see following comments.

In terms of the scoring, the criteria look to positive or negative changes. In doing so I am struggling to understand the purpose of a 0 score, it has little basis although I understand what it is trying to show. If one had a neutral question i.e. what is the affect on air quality it could improve, reduce or stay the same. One cannot have a neutral effect on a positive or negatively based question. I wrote assessments for many years.

From page 36 onwards:

Scores on SA given in brackets () where appropriate.

1. (0) IMPROVE health, local GPs are operating with reduced staff and certainly the Grove surgery has been operating phone appointments for some months due to lack of resources. Increasing population numbers cannot possibly increase without large scale investment and even more significantly the ability to recruit and retain staff to cope; this score and must surely be -ve

TStM primary school as I understand it, would not have anywhere near the capacity to deal with an approximate doubling of the village population. In addition it is stated that developments are in walking distance of the school. In my experience the road outside the school becomes lined with dozens of cars which makes for traffic jams if one is unfortunate to have to go that direction at peak times. Evidence would show that many people use there cars to access the school, usually or depending on the weather, regardless of distance which may be due to a number of factors. The considerable distance from the Howlett Way development, with no access along the main road, would clearly give rise to additional traffic. There would also be a need to cross the now much busier Howlett Way road to use existing footpaths, an even longer walk. I therefore see a considerable increase in road traffic along minor roads increasing negative impacts and increasing the potential for accidents.

This also negatively affects air quality and quality of life.

- - ve

- 2. Education and skills. Again I see no justification for this being improved but with sufficient resources it could be maintained. One may educate a larger number to the same level but without extra resources/new training systems no improvement would seem possible. With numbers of 6th form age people using the facilities in Ipswich, which also has vocational training, one would expect the usage of private and public transport to increase proportionately.
- 3. Reduce crime and ASB. The doubling in size of the village with current and potentially falling Police numbers as well as unknowns regarding populations cannot give a reduction. I see no justification regarding how a reduction may be achieved and in fact reduced enforcement (possibly per capita) and a 'change' in the character of the village I would suggest an increase in total negative incidents, even if the per capita rate is maintained.
- 4. Reduce poverty, no effect
- 5. Improve access to key services. As it is stated no new key services will be created this should be -ve
- 6. Employment, with the small number of temporary jobs which 'may' be created it hardly constitutes much of a benefit to the community, certainly not in comparison to the detriments already noted and those yet to be. Large builders tend to recruit form a large area and keep certain of their own people, I would expect to see large numbers travelling considerable distances from perhaps a 30 mile radius to work on the site. Not a great benefit to the local workers and lots of car and van journeys contributing to pollution.
- 7. Meet housing requirement for all. Given increasing house prices and ever reducing numbers of people being able to afford even starter homes I doubt that any housing built on these sites will assist this aim.

O - 7392 - 3883 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7392 Object

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

There also seems to be considerable deviation reported on the actual delivery of affordable housing highlighting a significant difference between planned and committed numbers and the number built. If the aim is not able to guarantee delivery what is the point of the aim. We may just end up with a larger number of 3, 4 and 5 bedroom houses to satisfy the better off and private landlords.

This also reflects on the employment criteria but will be mentioned here. There are no signs of significant growth in the Felixstowe area to justify the extent of extra housebuilding and influx of potential labour. There are several mentions of the Port but the reliance on one facility to drive employment and economic growth is an extremely risky one as well as it being dubious as to whether it will create large numbers of jobs.

One would therefore have to suggest that those that would occupy the homes planned would be travelling to other places i.e. Ipswich and beyond and possibly some using them as second homes.

The large employers i.e. BT are moving more jobs offshore and Felixstowe etc is outside the travel limits for Sizewell B (and C) so there will be no influence there.

In my opinion a great deal could be done by utilising economic and other factors to ensure SC is not just a place for the protected, nice areas to be preserved and to be used as second homes with limited positive economic benefit and the exclusion of those that want to live and work here full time.

Reducing vacant properties and enabling them to be utilised by full time inhabitants should run alongside further housing number growth.

8. (++) Improve quality of where people live and community participation. Quite frankly I am baffled by the justification for the ++ score based on the comments given.

Many acres of productive farmland will be dug up and concreted to create a village ~ twice the size which will look like a large housing estate from the A14 roundabout to Felixstowe. The separation of the two villages with demarcation made by a large visible arable area makes the village look like a village. One then sees a variety of housing before moving to following communities.

This field area a pleasure to see and be able to access, there is no possible justification of a ++ score that can be achieved by building on it.

Improvements of Rights of Way is a trivial task which only maintains what exists, in a much more suitable and fitting surrounding. If the RoW were maintained it would make this point irrelevant, it would just make it fit for purpose as it should be currently anyway. As it is Council budgets are reducing and less and less maintenance is being carried out, as such any improvement would seem somewhat temporary and irrelevant.

The plan to introduce a 'green area' to compensate for the loss of acres of greenfield is frankly preposterous, it is window dressing and irrelevant compared to the detriment.

This should be a - - ve score

9.

- 10. Air quality. This is not likely to remain stable it can only, with the building and occupation process cause it to decline.
- 11. ok
- 12. ok
- 13. Once again it is not 'likely' to increase waste, it WILL increase waste - ve
- 14. Reduce effects of traffic.

In general the building of the number of houses proposed in the Felixstowe - Trimley corridor will lead to thousands of extra traffic movements per day. Expanding a village to double its size will generate a vast amount of extra traffic from domestic usage, throughout the day, evening and night. There is also of course extra public transport assuming that it runs at times which correspond to when people wish to travel and the destinations they wish to reach. Deliveries and services vehicles etc etc.

I see that public transport is referred to several times however these services are well occupied at peak times and running extra together with traffic movements from those going to other places or that need different timings, mobility etc would lead to great difficulties on the High Roads through the villages. The peak times could have to deal with several hundred people going through the villages in either direction, together with extra public transport. The High Roads already have great difficulty due to the school collection at peak times and road side parking. This will be a terrible journey. Not to mention those on the route will be subjected to a great deal of extra traffic noise and pollution. No amount of tinkering with traffic flows is going to alleviate the problems, there is no room for road widening along enough of the route.

- 15. Reduce greenhouse gases. Energy consumption per capita may reduce due to improved building standards however TOTAL emissions will be increased significantly for the lifetime of the housing stock and the detriment of the environment. -- ve
- 16. Reduce flooding. Although a low flood risk zone reduction in absorption capability by building over greenfield is a substantial reduction in the sites capacity. No amount of mitigation will significantly change the negative effects. -/-- ve

O - 7392 - 3883 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7392 Object

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

17. Wildlife conserve and ENHANCE. Again the removal of natural environment is a destruction of habitat which is totally out of keeping with the village aspect and location. -- ve

18/19. I am struggling to think of how the aspects of listed buildings will be enhanced by any sort of modern building, certainly of the type that will almost certainly be built on these sites.

The filling in of the visible gap between the Trimleys, that visible from Howlett Way is a positive detriment to the character of the villages. It turns two habitations into, at least, the appearance of one sprawling mass. A small increase in numbers perhaps in line with the proposals, current Mushroom farm development and opposite the Hand in Hand may enable much of the character to be maintained. The Larger Howlett Way development would not only be grossly more than the expected housing need but also ruin the village by ~ doubling its size.

The remaining points are already covered but to reiterate briefly, I fail to see how more houses will regenerate the town centre, extra people will do as the current ones do. So much trade will take place out of centre although somewhat of an increase may be expected.

I fail to see any justification for the ++ score in terms of employment, it appears a hopeful but baseless assessment.

In summary

Although I acknowledge all areas in the District should do their bit to enable population growth, from whichever source, it should take account of the aging population who seem to favour the Felixstowe area and build, in part, suitable housing to accommodate them.

Filling in the area off Howlett Way is the worst possible solution for numerous reasons as detailed. Smaller scale development would seem suitable and the Hand in Hand site would seem to have less downsides and helping to balance occupation of the village both sides of the High Road.

I would also suggest some the triangular section of ground to the NE going to the A14 sliproad, near the allotments might be suitable for small scale development which would be more in-keeping with the character and distinctiveness of the village.

I would hope that the scale of the negative impacts would outweigh comprehensively the positives; let the villages retain some of their heritage and allow us to remain separate and distinctive.

Summary:

Although I acknowledge all areas in the District should do their bit to enable population growth, from whichever source, it should take account of the aging population who seem to favour the Felixstowe area and build, in part, suitable housing to accommodate them.

Filling in the area off Howlett Way is the worst possible solution for numerous reasons as detailed.

I would hope that the scale of the negative impacts would outweigh comprehensively the positives; let the villages retain some of their heritage and allow us to remain separate and distinctive.

Change to Plan

I would also suggest some the triangular section of ground to the NE going to the A14 sliproad, near the allotments might be suitable for small scale development which would be more in-keeping with the character and distinctiveness of the village.

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7521 - 4033 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7521 Object

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: P C King [4033] Agent: N/A

Full Text: I thank you for Reference A. The sites mentioned in connection with Reference A will finally sound the death knell for

the historic twin villages of Trimley as individual settlements. The area between the road and rail links to the Port of Felixstowe will be completely urbanized. This will subject the populace to polluting emissions from road vehicles and rail motive units 24/7, and the problem is further exaggerated by the traffic on the busy High Road, which runs through the

centre of this confined area.

These options are certainly not the preferred options of the villages, but are the final nail in the coffin of future generations, who will be deprived of the green lungs and open spaces that were our heritage. Throughout the whole ill conceived exercise the Council have failed to listen to the concerns of the residents of the Felixstowe Peninsula, or for that matter the District as a whole. Certainly, in my opinion, the Trimleys have borne the brunt of the so called

regeneration of Felixstowe, and unfairly so.

Summary: These options are certainly not the preferred options of the villages, but are the final nail in the coffin of future

generations, who will be deprived of the green lungs and open spaces that were our heritage. Throughout the whole ill conceived exercise the Council have failed to listen to the concerns of the residents of the Felixstowe Peninsula, or for that matter the District as a whole Containing the Tripleys have been the brust of the second

that matter the District as a whole. Certainly, in my opinion, the Trimleys have borne the brunt of the so called

regeneration of Felixstowe, and unfairly so.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7540 - 4044 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7540 Object

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: S A Osborne [4044] Agent: N/A

Full Text: Too many houses already in Trimley St Martin, how will the services etc cope. You are ruining our village.

FPP6

Trimley St Martin - unfairly treated - our village is turning into a town. No shops for the people can't drive + elderly.

FPP7

Howlett's Way. I hope the traffic from that site will use A14 and not the High Road which is already congested before the

new houses being built.

Why wasn't Mushroom From houses already being built not put on map.

Accident waiting to happen coming out of Mill Lane Trimley onto the High Road, too many cars parking for the 'play

school' etc.

When there is a accident / incident on the A14, the lorries are sent through our village. It's grid lock and cutting up the

road and verges and weight limit on the bridge Trimley St Mary stop the lorries now.

Why not start another village the other side of the A14, that would have been even more sensible.

All the different views won't make any difference, I bet it is all done and dusted!!!

Summary: Too many houses already in Trimley St Martin, how will the services etc cope. You are ruining our village. Howlett's

Way. I hope the traffic from that site will use A14 and not the High Road which is already congested before the new

houses being built.

Accident waiting to happen coming out of Mill Lane Trimley onto the High Road, too many cars parking for the 'play

school'

When there is a accident / incident on the A14 It's grid lock

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7542 - 1438 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7542 Comment

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: R F Osborne [1438] Agent: N/A

Full Text: Mushroom development not on map?

FPP6

Access to High Road will put extra pressure on dangerous stretch of road totally unsuitable.

FPP7

Howlett Way only suitable if traffic does not add to High Rd.

FPP8

Again more congestion onto High Road which is already congested.

General observation

Trimley has had it's share of building over the years our Trimley has been treated unfairly the best solution would be to use land on the left of A14 between Dock Spur and Beatrice Avenue building complete new village. Too much emphasis on building on Trinity land! Band heavy lorries using High Road when trouble occurs on A14. Not at all happy.

Summary: Mushroom development not on map?

Howlett Way only suitable if traffic does not add to High Rd.

Trimley has had it's share of building over the years our Trimley has been treated unfairly the best solution would be to use land on the left of A14 between Dock Spur and Beatrice Avenue building complete new village. Too much emphasis

on building on Trinity land! Band heavy lorries using High Road when trouble occurs on A14.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7545 - 4046 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7545 Object

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: . . [4046] Agent: N/A

Full Text: The road of the Josselyns is far too narrow for access for a new estate and we are extremely unhappy about the

proposal route especially as the building lorries would come this way it will be horrible for the residents of the Josselyns it is so quiet and lovely here and we do not want all these houses and traffic past our house. This road is too narrow.

Summary: The road of the Josselyns is far too narrow for access for a new estate and we are extremely unhappy about the

proposal route especially as the building lorries would come this way it will be horrible for the residents of the Josselyns

it is so quiet and lovely here and we do not want all these houses and traffic past our house. This road is too narrow.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7551 - 4050 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7551 Object

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: Mr & Mrs G & J Harding [4050] Agent: N/A

Full Text:

Too much emphasis has been put on housing in the Trimleys and Walton without any thought to the infrastructure, i.e. small High Road and what goes under it. The High Road was made for herding cattle from Trimley to Ipswich and has not been changed in any way since. This road will not be able to cope with such high housing numbers bearing in mind that sewage has been in front gardens of properties in New Road and Addington Road. We all need water will there be enough and who are these houses being built for?

Site 451d Howlett Way

This site originally was given as app 220 houses. Now it is app 360 plus. Why?

Site 383f Thurmans Lane

This site is a massive over build. A developer by the name of Bloor Homes we are led to understand wishes to build 98 houses on a small plot of land by the side of Thurmans Lane. We have photographs to prove this which shows the narrowness of the entry and exit road which by no means will take the volume of traffic generated by possibly 2 cars per household and may be more, plus the builders traffic for 2 years plus. The only entry and exit will have to be through The Josselyns where there are already app 100 properties, this is totally unacceptable and will destroy the quality of life of the residents who have never had people or cars passing their homes and will now turn it into a main road. The houses on The Josselyns have very small gardens and a proposed development alongside their rear gardens, fence to fence, will make for an over build.

451f Thomas Avenue rear

This site is very small and was originally put down as app 26. Three months ago Trinity College presented to Trimley St Mary parish council a plan for a development of app 55 houses. This sent shock waves through everybody and they walked away saying they would submit a different plan.

This will have to be very different if at all, as this space, plus the Bloor plan will create a massive over development. The only entry and exit for this site will be Thomas Avenue, again creating large numbers of vehicles every day and again reducing the quality of life for these residents. These two sites in the end will all go on to Faulkeners Way and then to the mini roundabout on to High Road which is struggling at the moment to avoid near misses and accidents as we ourselves and have witnessed. The High Road at times is impossible to cross.

These 2 above sites 383f and 451f should not be considered. Howlett Way, site 451d is partially a brownfield site being the old poultry farm but this has been over extended and should be reduced considerably.

Summary:

Site 451d Howlett Way

This site originally was given as app 220 houses. Now it is app 360 plus. Why?

Too much emphasis has been put on housing in the Trimleys and Walton without any thought to the infrastructure, i.e. small High Road

This road will not be able to cope with such high housing numbers bearing in mind that sewage has been in front gardens of properties in New Road and Addington Road. We all need water will there be enough and who are these houses being built for?

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7581 - 1841 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7581 Comment

Housing Preferred Policy FPP7: Land off Howlett Way, Trimley

St Martin

Respondent: Mrs Rosemary Gitsham [1841] Agent: N/A

Full Text: Felixstowe Peninsula area action plan

FPP7 - Land off Howlett Way, Trimley St Martin

I spoke to a lady in your office this afternoon & pointed out an error on the OS map regarding "The Old Rectory, Church Lane". She asked me to email the details which I have done. Briefly, what may now have the postal address "The Old Rectory" is not a listed building & the actual Victorian Old Rectory is on the opposite side of Church Lane in the parish of Trimley St Mary & is currently known as "Sevenoaks".

The building wrongly named on your map is a relatively modern building which was used as the rectory some time after

the 1940/50s. The current rectory is an even newer house also in Church Lane.

I have lived here on & off all my life (80 years) and am the Local History Recorder for Trimley St Martin with the Suffolk

Local History Council.

Summary: I spoke to your office this afternoon & pointed out an error on the OS map regarding "The Old Rectory, Church Lane".

Briefly, what may now have the postal address "The Old Rectory" is not a listed building & the actual Victorian Old Rectory is on the opposite side of Church Lane in the parish of Trimley St Mary & is currently known as "Sevenoaks". The building wrongly named on your map is a relatively modern building which was used as the rectory some time after

the 1940/50s. The current rectory is an even newer house also in Church Lane.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments: Trimley Map.pdf

C - 7683 - 2581 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7683 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text:

Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

- * FPP4 Walton Field evaluation has identified an Early-Middle Bronze Age funerary landscape across the site, with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.
- * FPP6 Trimley Cropmarks on this site show that there are complex archaeological remains of pits, ditches and a coaxial field system and trackways of possible late prehistoric date (TYN 122). Archaeological remains are therefore known on the site, although they have not been fully characterised.

Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7683 - 2581 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7683 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

Early Education

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The Government has indicated that it will legislate to double the number of hours' free childcare to 30. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

- In the Trimleys, developer contributions have already been secured to help manage the existing deficit in Early Years places and proposals are being drawn up to deliver additional places. Further development of the scale proposed (530 dwellings) will necessitate significant additional provision. Under current statutory arrangements, this would necessitate 53 additional places. When Land North of Walton High Street (400 dwellings) is included, the number of places required under current arrangements would increase to 93.

The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

- Development in the remainder of Felixstowe (150 dwellings North of Conway Close and 40 dwellings at Sea Road) can be managed by expanding existing settings.
- At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

The County Council would appreciate consideration of ways in which this policy could be more supportive of early education in retail centres, as part of a balanced policy which also protects the vitality and viability of retail centres. Policy FPP17 appears to implicitly support early education already, and discussion with the District Council may conclude that this policy is sufficient.

Primary Education

The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7683 - 2581 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7683 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

[see table in attached document]

Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

Grange Primary School can also expand, though this school is also not well related to the proposed allocations or future directions of growth.

Paragraphs 37 and 38 of the National Planning Policy Framework reflect the need to minimise the length of journeys to school and, for major developments, primary schools should be located within walking distance of most properties.

The best long term solution would be to reserve 2.2ha land for a new 315-place primary school and early years setting in a location which is well related to housing growth. This would also enable provision to be made for future growth, with another school capable of expansion.

Options for reserving land for a new primary school include:

- Land within 'Land North of Walton High Street'
- Land within another one of the Trimley sites
- Land in another location in the Trimleys, well related to sustainable travel routes and the new housing.

Secondary and Sixth Form Education

Based on standard pupil multipliers, development of 1,135 dwellings would be expected to generate an additional 204 secondary school pupils and an additional 45 sixth formers.

Felixstowe and the Trimleys are served by Felixstowe Academy. Based on the forecast below, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from the development proposed in this Plan.

[see table in attached document]

All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

Health, Wellbeing and Social Care

A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

C - 7683 - 2581 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7683 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

- * Ferry Road opposite site 502E
- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-

C - 7683 - 2581 - Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin - None

7683 Comment

Housing

Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

FPP7 Transport Access and Traffic Issues. 360 units. Access my be acceptable however Church Lane is very narrow and has limited visibility onto High Road. Could be linked through to adjacent site but this would be an excessive number served from one access. Transport Assessment required cumulative with the current Mushroom Farm sites. Other detailed comments provided under headings Sustainability (public rights of way) and collision history. Further detailed information provided on potential mitigation schemes.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

Felixstowe Sites FZ.pdf 2015-11-23 Felixstowe AAP_SCC Final Response.pdf Kirton Sites SW.pdf Kirton Sites FZ.pdf Felixstowe Sites SW.pdf

O - 6730 - 3779 - Sustainability Appraisal Information - None

6730 Object

Housing Sustainability Appraisal Information

Respondent: Ms Laura Locke [3779] Agent: N/A

Full Text: Further justification and mitigation for loss of agricultural land and environmental impact on area through increased

traffic and lack of social amenities.. schools and medical

Summary: Further justification and mitigation for loss of agricultural land and environmental impact on area through increased

traffic and lack of social amenities.. schools and medical

Change to Plan Further justification before developer allowed permission

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6639 - 3737 - 3.67 - None

6639 Object

Housing 3.67

Respondent: MS Rebecca West [3737] Agent: N/A

Full Text: The proposal for 'access from The Josselyns and Thomas Avenue' is ludicrous. These narrow roads were designed as

cul-de-sacs, not through roads for hundreds of additional cars. They are not suitable .There is no way they could be adapted for such use. Also, the existing residents would be denied the peaceful and safe use they currently have. Hundreds of cars seeking to exit and enter at peak hours would cause unacceptable noise, congestion and pollution in

these small roads and on into Faulkners Way and the junction at the mini-roundabout.

Summary: The proposal for 'access from The Josselyns and Thomas Avenue' is ludicrous. These narrow roads were designed as

cul-de-sacs, not through roads for hundreds of additional cars. They are not suitable .There is no way they could be adapted for such use. Also, the existing residents would be denied the peaceful and safe use they currently have. Hundreds of cars seeking to exit and enter at peak hours would cause unacceptable noise, congestion and pollution in

these small roads and on into Faulkners Way and the junction at the mini-roundabout.

Change to Plan As there are no other alternative access points this site is not a feasible option and should be abandoned.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6727 - 3779 - 3.68 - None

6727 Object

Housing 3.68

Respondent: Ms Laura Locke [3779] Agent: N/A

Full Text: Some of the houses backing onto the field in question are over 300 years old. Can there be a guarantee that the

development would a) be sympathetic in style. b) have effective screening and access put into place?

Summary: Some of the houses backing onto the field in question are over 300 years old. Can there be a guarantee that the

development would a) be sympathetic in style. .b) have effective screening and access put into place ?

Change to Plan Symathetic build near boundaries so no overlook including low rise, screening, buffer zones, access to properties

considered.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6554 - 3673 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6554 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Mr Craig Jones [3673] Agent: N/A

Full Text:

Having seen the proposed development for the south of Thrumans Lane in Trimley St Mary and would like to raise my concerns as a resident in Great Field, Trimley St Mary.

I understand Suffolk Council has to build housing as part of the government guidelines, but they must understand it is not just the homes that are built, but the impact of increased traffic, congestion of the already busy side roads which usually have vehicles parked on each side of the road, increased services to the estate.

This is also a bus route, and very close to the local schools entrapment area which would increase the danger of possible accidents, noise and pollution.

At a local meeting with the developer it was suggested that the project may take a few years to complete with stop and start dates depending on the sale of the homes.

The HGV deliveries to supply the site would cause issues with the small access that is proposed route though Thomas Ave and The Josselyns, this has already had an issue this year when an ambulance had to park away from the resident home it was called to due to vehicles parked in the road.

Has the issue of a possibility of an increase in crime been looked at or raised with the local Police?

Is there a proposal to allow greater access to Trimley High Rd from the increased size of the estate? Probably not, once its built the council will state that there is no money due to cut backs!

Has anyone in the council seen the grid lock to the High Rd when the A14 has been blocked due to an accident? Even more local resident trying to access their home!

The local residents are good wage earners and enjoy the standard of the area, I feel this would lead to a few moving away further afield, say Woodbridge etc, to have the same quality of home and neighbourhood.

The local residents bought homes in Thomas Ave, Great Field, and The Josselyns roads for the "cul de sac" type of home, not a thoroughfare access to a new estate.

I have no doubt that this plan will go ahead despite local concerns.

A reply to my questions would be nice.....but not expected.

Summary:

This is a bus route, and close to the local schools entrapment area which would increase the danger of possible accidents, noise and pollution.

The HGV deliveries to supply the site would cause issues with the small access that is proposed. The local residents bought homes in this area for the "cul de sac" type of home, not a thoroughfare access to a new estate. Is there a proposal to allow greater access to Trimley High Rd from the increased size of the estate?

Has the issue of a possibility of an increase in crime been looked at?

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6564 - 3694 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6564 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Sally Hitchen [3694] Agent: N/A

Full Text: Re proposed building of new houses on land adjacent to Thurmans Lane

I am extremely concerned about the plans to build a number of new houses on land very near to our property and the impact such a development would have on all residents in the surrounding area for a number of reasons. Firstly, when we bought our house, a major selling point was that it was in a quiet cul-de-sac. This of course would no longer be the case as the end of Thomas Avenue would be opened to provide access to any new properties. Consequently, the value of houses in the affected area would depreciate in value.

Secondly, has anybody considered how the already congested roads on the estate would be able to accommodate even more traffic? When the estate around Faulkeners Way was built, it was extremely unusual for any household to own more than one vehicle, many families had no car at all, and the road widths and layouts were designed accordingly. Now it is commonplace for households to have two, three of even four cars and all roads around the estate are struggling to cope with the volume of traffic. This means that roads crowded with parked vehicles are not only now dangerous to cross but they also make access to remote areas of the estate (like Thomas Avenue) very difficult. Indeed, there was an incident in Thomas Avenue quite recently when an ambulance was called to the end of the cul-desac and the responding vehicle was unable to reach the house and had to park a considerable distance down the road. Fortunately, in this instance, this did not result in fatalities but has anybody considered whether the emergency services would be able to access any new builds? They certainly would not be able to gain access through Thomas Avenue; recent events have proved this. (This would of course also mean that supply lorries for the build would have difficulty gaining access to the area through Thomas Avenue.)

Another factor to be considered is the impact of more housing on local schools. Would Trimley St Mary School have the potential to take the resulting increase in the number of children in the area? And if so, how would this impact on the traffic on Trimley High Road at the beginning and end of the school day? From my experience, even with existing pupil numbers, school drop off and pick up times make the High road almost impassable and extremely dangerous. It is, even at present, a disaster waiting to happen! The road on Faulkeners Way, behind the school, is no better and has cars parked on kerbs and grass verges everywhere at this time.

Finally, the area of land to be developed is currently home to a great deal of wildlife. There are very few such remaining places in the local area and if we continue to build on every piece of land we can find, wildlife will sadly become a thing of the past.

I fully understand that the Felixstowe and Trimley areas are in need of more affordable housing but the building of such properties should not take place where they will have such a vast impact on local residents. Surely a better solution to the housing situation would be to construct a development on a much larger scale incorporating all that is required e.g. shops, school, parking etc. within such a development.

Summary:

All roads around the estate are struggling to cope with the volume of traffic. Roads crowded with parked vehicles are not only now dangerous to cross but they also make access to parts of the estate very difficult. The emergency services certainly would not be able to gain access through Thomas Avenue.

Would Trimley St Mary School have the potential to take the resulting increase in the number of children in the area? How would this impact on the traffic on Trimley High Road? Faulkeners Way has cars parked on kerbs and grass verges everywhere at this time.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6568 - 3670 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6568 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Mr Ian Finch [3670] Agent: N/A

Full Text: Re: Thurmans Lane Trimley St Mary.

(Residents concerns).

It has been noted that no notification has so far been placed in this lane by your department!

Following the latest consultation notification I would like to put a few points forward for consideration. I can see by the maps that the village boundary has been moved to incorporate the proposed housing abutting Thurmans Lane therefore taking this land out of "the countryside". I am not against the idea of housing but the number of dwellings 100 + proposed along with the issues that will arise with regard to the accessing of the High Road do concern me in this particular spot of which I am very familiar.

I understand from planning that Thurmans lane is in the country and that the fields towards Trimley St Martin beyond the lane are to be protected from major development keeping the two village identities separate.

I believe the preferred policy FPP8 Land off Thurmans Lane states 'no vehicular access into Thurmans lane' & the 'development will need to be sympathetic to the setting of Mill Farmhouse' to mention a few.

Thurmans Lane is also a well used bridle way and we must be considerate of these routes while trying to provide housing for the future.

With these points in mind if development of this land is to be approved then the detailed proposals need to include a substantial landscape buffer adjacent to Thurmans Lane running the complete length and behind Mill Farmhouse which should have a minimum width of 10 metres. Provisions also need to be made to ensure its long-term future management. It should not be allowed to form part of the gardens of dwellings otherwise future residents are likely to punch holes in it in order to improve their views and/or gain access to Thurmans Lane which would be completely unacceptable in highway terms.

In order to preserve the area deemed 'countryside' and to enforce the 'no vehicular access onto Thurmans Lane ' I can not think of a more attractive and sensible option and therefore put it forward for your consideration.

Summary:

I understand that Thurmans lane is in the country and that the fields towards Trimley St Martin beyond the lane are to be protected from major development keeping the two village identities separate.

If development of this land is to be approved then the detailed proposals need to include a substantial landscape buffer adjacent to Thurmans Lane running the complete length and behind Mill Farmhouse which should have a minimum width of 10 metres.

Thurmans Lane is also a well used bridle way and we must be considerate of these routes while trying to provide housing for the future.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6571 - 3699 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6571 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Mr Neil Partridge [3699] N/A Agent:

Full Text: In relation to considering whether to build on land South of Thurmans Lane it would be interesting to know where access

would be gained.

Thurmans Lane itself is too narrow. The other access off The Josselvns or Thomas Avenue would increase the traffic on Faulkeners Way to an unacceptable level. It is already busy on Faulkeners and to have access to say another 100 homes off there would be unmanageable. We would be heading a similar way to Grange Farm. There are other areas alongside Howlett Way and near to the old mushroom farm off the main roundabout that would less effect local

residents and cause a lot less issues with regards to traffic.

I am not adverse to seeing new houses being built as clearly it has to be done. Also more affordable housing so that

you her people can stay in the area.

Thurmans Lane is too narrow. Access off The Josselyns or Thomas Avenue would increase traffic on Faulkeners Way Summary:

to an unacceptable level. It is already busy on Faulkeners: to have access to another 100 homes off there would be unmanageable. There are other areas alongside Howlett Way and near to the old mushroom farm that would less effect

local residents and cause a lot less issues with regards to traffic.

I am not adverse to seeing new houses being built, clearly it has to be done. Also more affordable housing so that you

her people can stay in the area.

Change to Plan

Legal? Sound? **Duty to Cooperate?** Soundness Tests Appear at exam? Not Specified None

Not Specified Not Specified Not Specified

O - 6572 - 3700 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6572 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

N/A Respondent: Jeanette Hewitt [3700] Agent:

Full Text: As a Trimley resident I wish for it to be known that I am opposed to the new build application planned for June 2016 at

the back of the Josslyns. I moved to Trimley two years ago with a desire to live in a countryside village. My partner and his family are lifelong Trimley residents and the Trimley High Road is already overused. If one hundred homes were

built it would, in my opinion, become impassable.

The Josslyns is essentially a dead end close with the road constructed purely for residents rather as a through pass. I have not yet spoken to any other residents who are approving of the new build, and I wish for my opinion, as a resident,

to be taken into consideration.

An additional one hundred homes does not make for village / countryside life.

I wish for it to be known that I am opposed to the new build application planned for June 2016 at the back of the Summary:

Josslyns. If one hundred homes were built it would become impassable; the Trimley High Road is already overused.

The Josslyns is essentially a dead end close with the road constructed for residents rather as a through pass. I have not yet spoken to any other residents who are approving of the new build, and I wish for my opinion to be taken into

consideration.

An additional one hundred homes does not make for village/countryside life.

Change to Plan

Legal? Sound? **Duty to Cooperate?** Soundness Tests Appear at exam?

Not Specified Not Specified Not Specified Not Specified None

C - 6578 - 3705 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6578 Comment

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Beth Manister [3705] Ν/Δ Agent:

Full Text: > I am writing with regards to the proposed development to build on the land south of Thurmans Lane. I understand that this is not been approved yet, but that is not a problem. I welcome new homes being built.

> My concern is that I have heard that a current dead end in The Josselyns will be used as access for the build site once it does go ahead. There are already too many cars parked around the area (sign of the times I guess) and adding lorries, diggers, trucks, vans and whatever else builders drive into the mix will cause havoc!

> Surely the logical access will be from Thurmans Lane for both fields that will be built on, let's face it, these houses will go ahead. This is direct access from the High Road without coming through narrow residential streets and a cul-de-sac.

> I would be very interested to hear what plans will be put in place so as to avoid unnecessary noise and disruption for

current residents.

Summarv: My concern is that a current dead end in The Josselvns will be used as access for the build site once it does go ahead.

There are already too many cars parked around the area and adding lorries, diggers, trucks, vans and whatever else builders drive into the mix will cause havoc!

Surely the logical access will be from Thurmans Lane for both fields that will be built on, let's face it, these houses will

go ahead. This is direct access from the High Road without coming through narrow residential streets and a cul-de-sac.

Change to Plan

Appear at exam? Legal? Sound? **Duty to Cooperate? Soundness Tests**

Not Specified Not Specified Not Specified Not Specified None

C - 6608 - 2695 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6608 Comment

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Trimley St Mary Parish Council (Mrs Debra Cooper) Agent: N/A

[2695]

Full Text: The Parish Council understands that access will be through the existing housing estates however, if other land becomes

available then consideration should be given to using that other land for access to the development.

With the amount of houses to be built it is essential that sufficient infrastructure is in place to support the development. The Parish Council has ongoing concerns over the impact on the volume of traffic using the High Rd and the effect on

the residents.

Summary: The Parish Council understands that access will be through the existing housing estates however, if other land becomes

available then consideration should be given to using that other land for access to the development.

With the amount of houses to be built it is essential that sufficient infrastructure is in place to support the development. The Parish Council has ongoing concerns over the impact on the volume of traffic using the High Rd and the effect on

the residents.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6611 - 3729 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6611 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Albert & Irene Windle [3729] N/A Agent:

Full Text: I would like to raise an objection to the use of the Josselyns as the proposed access to the building of houses near

Thurmans lane.

We believe the Road is to small to use as an access to 100 houses and flats. The road is already congested with

parked cars as most residents have 2 cars and only small drives suitable for 1 car.

We do not object to the houses being built only to the use of the Jesselyns for access.

I would like to raise an objection to the use of the Josselyns as the proposed access to the building of houses near Summary:

Thurmans lane.

We believe the Road is to small to use as an access to 100 houses and flats. The road is already congested with

parked cars as most residents have 2 cars and only small drives suitable for 1 car.

We do not object to the houses being built only to the use of the Jesselyns for access.

Change to Plan

Sound? **Duty to Cooperate? Soundness Tests** Appear at exam? Legal? None

Not Specified Not Specified Not Specified Not Specified

C - 6619 - 3734 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6619 Comment

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Mr K and Mrs E D'arville [3734] Agent: N/A

Full Text: RE: HAVE YOUR SAY - HOUSING DEVELOPMENTS ON:-

Land off Howlett Way, Trimley St Martin

Land opposite the Hand in Hand pub, Trimley St Martin

Land off Thurmont Lane, Trimley St Mary

I understand the need for further development for housing but my concerns are:-

- 1. The livelihood of the farmer/s. Are they happy to give up these areas they have been working and earning a living from for the past x number of years?
- 2. Exactly how many 'affordable homes' ie one and two-bed dwellings will be allocated for current homeowners to purchase who wish to upsize or downsize?

I say this because, on making enquiries on purchasing a two-bed property on the Mushroom Farm complex, I was informed they were all going to the Housing Association, which I consider rather unfair to current homeowners who want to move

- 3. I understand land opposite the Hand in Hand is due to undergo development. Will there be any chance of a decent number of 2-bed dwellings being offered on the open market or will the same policy apply as the Mushroom Farm policy?
- 4. If and when it does come to the planning of the above developments can care be taken on:-
- a) The planting of trees ie avoiding species such as Sycamore which are an absolute nightmare for those who have to clear up after them, not only in the Autumn but Spring as well. It's not just their leaves to clear up but also their constant seedlings, which can take root, if allowed, and not a good idea if right next to your house.
- b) Storm drains. Can the planners avoid installing storm drains, which are subsequently written in the deeds of the homeowners as their responsibility, as a group, to share the maintenance and costs, and not the council. Yes I speak from experience.
- c) Kerb side general areas all nicely planted up but again subsequently written into the deeds of homeowners to share costs/responsibility of maintaining.

 In real life this does not work.

Your comments/feed back on the above would be much appreciated.

Summary:

I understand the need for further development for housing but my concerns are:-

The livelihood of the farmer/s. Are they happy to give up these areas they have been working and earning a living from for the past number of years?

How many 'affordable homes' ie one and two-bed dwellings will be allocated for current homeowners to purchase who wish to upsize or downsize?

Care is needed when planting trees and avoiding sycamores which are a nightmare to clear up after. Storm drains should be responsibility of Council, not indivual land oweners.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 6636 - 2963 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6636 Comment

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Suffolk Coastal District Council (SCDC Agent: N/A

Environmental Protection) [2963]

Full Text: I would like to comment, with regard to air quality, on the above Preferred Options Consultation as follows:

1) Felixstowe Peninsula Area Action Plan

* Land North of High Street, Walton - SHLAA Ref 451g Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this

site.

* Land rear of Conway Close, Felixstowe - SHLAA Ref 502e

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

- * Land opposite Hand in Hand Public House, Trimley St. Martin SHLAA Ref 451b Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.
- * Land off Howlett Way, Trimely St. Martin SHLAA Ref 451d and 451c Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with both of these sites.
- * Land South of Thurmans Lane, Trimley St. Mary SHLAA Ref 383f and 451f Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with both of these sites.

* Employment

Land at Haven Exchange

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

- 2) Site Allocations & Area Specific Policies Development Plan Document
- * SSP10 Garden Square, Rendlesham

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* SSP11 - 3-33 Suffolk Drive, Rendlesham

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* SSP22 - Bentwaters Park, Rendlesham

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* SSP 31 - Snape Maltings

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

Other comments

With regard to the Neighbourhood Plans for Woodbridge, Kesgrave and Leiston (and any others in the pipeline), we have particular concerns about developments with the potential to impact upon the volume and/or types of vehicular traffic at the Woodbridge Air Quality Management Area.

C - 6636 - 2963 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6636 Comment

Housing

Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

It is sometimes difficult to convey to developers the importance of AQ impacts in respect of developments which may be, (by their own judgement) a significant distance from the Woodbridge AQMA; however, efforts to find ways of reducing the elevated levels of transport-related pollutants at this location to below the levels required by the EU Air Quality Directive (and UK regulations) have consistently failed to produce the required improvements in the 10 years or so since this AQMA was declared. This failure could result in financial penalties to the UK government from the EU. We are assured that any such penalties will be passed on to LAs with "failing" AQMAs in their districts. Consequently, we need to leave no stone un-turned in our examination of any proposed larger scale development (whether housing or otherwise) which has the potential to increase vehicle traffic at the existing Woodbridge Junction AQMA is consequently a matter of serious concern. Any such scheme must be accompanied by technical and robust modelling to predict the impact on traffic at this AQMA, accompanied by and assessment of the possible methods of mitigating those impacts.

The same general comments apply to some areas where our modelling/sampling indicates AQ thresholds are under pressure (but not yet breached) from transport-related sources.

Summary:

* Land South of Thurmans Lane, Trimley St. Mary - SHLAA Ref 383f and 451f Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with both of these sites.

Change to Plan

Appear at exam?
Not Specified

Legal?
Not Specified

Sound?

Duty to Cooperate?

Soundness Tests

Not Specified Not Specified None

O - 6663 - 3750 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6663 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Mr John Turner [3750] Agent: N/A

Full Text: Dear SCDC Planning

We are writing to you to object to the plans to build on the two fields on land South of Thurmans lane Trimley st. Mary. As residents of the Josselyns our main concern is the access route into the new estate and building site as this we believe would be through the narrow residential road of the Josselyns. This road already has enough traffic movements and parking problems and we do not believe this road or Falkeners Way and mini-roundabout could cope with more

traffic.

Summary: We are writing to you to object to the plans to build on the two fields on land South of Thurmans lane Trimley st. Mary.

As residents of the Josselyns our main concern is the access route into the new estate and building site as this we believe would be through the narrow residential road of the Josselyns. This road already has enough traffic movements and parking problems and we do not believe this road or Falkeners Way and mini-roundabout could cope with more

traffic.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6703 - 3766 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6703 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Sir/ Madam [3766] Agent: N/A

Full Text: We are writing to you to object to the plans to build on the 2 fields on land south of Thurmans lane Trimley St Mary. As

residents of The Josselyns our main concern is the access route into the new estate and building site as this we believe would be through the narrow residential road of the Josselyns, this road already has enough traffic movements and parking problems and we do not believe this road or Faulkerners way and mini roundabout could cope with more traffic.

We are worried about emergency vehicles gaining access and parking as there are many elderly residents.

If there is building of more houses another access route is needed!

Summary: We object to the plans to build on the 2 fields on land south of Thurmans lane Trimley St Mary. As residents of The

Josselyns our main concern is the access route into the new estate and building site as this we believe would be through the narrow residential road of the Josselyns, this road already has enough traffic movements and parking problems and we do not believe this road or Faulkerners way and mini roundabout could cope with more traffic. We are worried about emergency vehicles gaining access and parking as there are many elderly residents.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6705 - 3768 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6705 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Jennifer Monk [3768] Agent: N/A

Full Text: We are writing to you to object to the plans to build on the 2 fields on land south of Thurmans lane Trimley St Mary. As

residents of The Josselyns our main concern is the access route into the new estate and building site as this we believe would be through the narrow residential road of the Josselyns, this road already has enough traffic movements and parking problems and we do not believe this road or Faulkerners way and mini roundabout could cope with more traffic.

Summary: We are writing to you to object to the plans to build on the 2 fields on land south of Thurmans lane Trimley St Mary. As

residents of The Josselyns our main concern is the access route into the new estate and building site as this we believe would be through the narrow residential road of the Josselyns, this road already has enough traffic movements and parking problems and we do not believe this road or Faulkerners way and mini roundabout could cope with more traffic.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6761 - 3791 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6761 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Mr David Cook [3791] Agent: N/A

Full Text: May I add my name to a list of residents in the Josselyns Trimley Saint Mary who are strongly opposed to any plans to

build new housing on the field at The Josselyns. The disruption to our narrow street before, during and after any such building project will be intolerable and completely change, forever, our relatively peaceful community. I moved to this area in 1993, when I had to retire from the Metropolitan Police service on ill health grounds, to escape from the strain of living in London. I still have M.E., which caused me to have to go up my job and seek less stressful surroundings. The

thought of living next to a major building site fills me with dread.

Summary: I am strongly opposed to plans to build housing on the field at The Josselyns. The disruption to our narrow street before,

during and after any such building project will be intolerable and completely change, forever, our relatively peaceful community. I moved to this area in 1993, when I had to retire from the Metropolitan Police service on ill health grounds, to escape from the strain of living in London, which caused me to have to go up my job and seek less stressful

surroundings. The thought of living next to a major building site fills me with dread.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6763 - 3792 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6763 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Gemma Read [3792] Agent: N/A

Full Text: To whom it may concern,

We strongly object to the plans to build on the 2 fields on land south of Thurmans lane Trimley St Mary. As long term residents of The Josselyns we have many concerns.

- * Very concerned that the access route into the new estate and building site would be through the very narrow residential road of the Josselyns, this road already has more than enough traffic movements for the houses here already and there is not enough parking at present for the existing houses causing parking problems
- * The main access road would be past our front window
- * Regularly delivery lorries and refuse lorries drive over our garden because the road is too narrow
- * We do not believe this road or Faulkerners way and mini roundabout could cope with more traffic. At peak times there is congestion on Faulkerners Way.
- * Our main outlook is the Josselyns field and not only would we lose this view we are concerned about the noise levels especially during building work as my partner work shifts and would not be able to sleep during the day with the constant noise
- * We have an 11 month old child and another on the way due May 2016 and our home is very close to the road. We have great concerns about the noise levels whilst the building work is going on with a newborn baby trying to sleep
- * We chose this house for the quiet area and enclosed cul-de-sac
- * We are very concerned about the value of our house depreciating
- * Our family lives would be disrupted by this and we would not have the same quality of life
- * Environmentally this is also wrong to build on farming fields.
- * Please consider our views

Summary:

Very concerned that the access route into the new estate would be through the narrow residential road of the Josselyns, this road already has more than enough traffic and there is not enough parking for the existing houses.

We do not believe this road or Faulkerners way and mini roundabout could cope with more traffic. Our main outlook is the field; not only would we lose this view we are concerned about the noise levels especially during building work. We chose this house for the quiet area and enclosed cul-de-sac

Environmentally this is also wrong to build on farming fields.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6808 - 3810 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6808 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Mr & Mrs P & H Williams [3810] Agent: N/A

Full Text: We are writing to you to strongly object to the plans to build on the 2 fields on land south of Thurmans lane Trimley St

Mary. We live in The Josselyns and our main concern is the access route into the new estate and building site as this would be past our home through the narrow residential road of the Josselyns, this road already has enough traffic movements and sometimes we cannot get out of our drive as we get blocked in there are a lot of parking problems and we do not believe this road or Faulkerners way and mini roundabout could cope with more traffic. My other concerns are that I am a shift worker and the noise and constant stream of traffic would be a disturbance to me and as my job is of a safety critical nature you will understand why this disturbance would be a worry to me. Also, has anyone considered the impact to the wildlife which live in the hedgerows surrounding these fields namely Hedgehogs who frequently visit my garden to eat the food we put out for them, these animals are in danger of extinction with less than a million left in the

country, surely some thought should be given to their plight.

Summary: Our main concern is the access route into the new estate and building site as this would be through the narrow

residential road of the Josselyns, this road already has enough traffic movements; sometimes we cannot get out of our drive as we get blocked in there are a lot of parking problems. We do not believe this road or Faulkerners way and mini

roundabout could cope with more traffic.

Has anyone considered the impact to wildlife which lives in the hedgerows surrounding these fields namely Hedgehogs

who frequently visit my garden; these animals are in danger of extinction .

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6809 - 3811 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6809 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Jo Ford [3811] Agent: N/A

Full Text: I am writing to you to object to the plans to build on the 2 fields on land south of Thurmans Lane Trimley St Mary.

As a resident of The Josselyns one of my main concerns is that the access route in to the new estate and building site would be through the narrow residential road of The Josselyns. This road already has enough traffic movements and parking problems and I do not believe this road or Faulkeners Way and mini roundabout could cope with any more. I also think that it would totally alter the area and would cause a lot of problems with the extra traffic on a road that

struggles already if more than one delivery van turns up at once.

The view of the fields and the knowledge that we don't get many people cutting through The Josselyns will be lost, as instead of being on the quiet end of a road it will be in the middle of a very busy location. This is not what I chose to live

in when I moved to The Josselyns.

Summary: One of my main concerns is that the access route in to the new estate and building site would be through the narrow

residential road of The Josselyns. This road already has enough traffic movements and parking problems and I do not

believe this road or Faulkeners Way and mini roundabout could cope with any more.

I also think that it would totally alter the area and would cause a lot of problems with the extra traffic on a road that

struggles already if more than one delivery van turns up at once.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6862 - 3829 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6862 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Vicki Wilmington [3829] Agent: N/A

Full Text:

We strongly object to the plans to build on the 2 fields on land south of Thurmans lane Trimley St Mary. We have lived in The Josselyns a long time we have many concerns.

- * Very very concerned & unhappy that the access route into the new estate and building site would be through the very narrow residential road of the Josselyns, this road already has more than enough traffic movements for the houses here already and there is not enough parking at present for the existing houses causing parking problems
- * Our home is very close to the road and our front window is on path,we have great concerns about the noise levels whilst the building work is going on
- * The parking in our road is limited and very often cannot park anywhere near our home
- * We do not believe this road or Faulkerners way and mini roundabout could cope with more traffic. At peak times there is congestion on Faulkerners Wayand mini roundabout.
- * Concerned about the safety nature of all the building transport coming down our narrow road
- * This road is far too narrow for the extra traffic
- * Our house would depreciate in value
- * Worried concerned about the crime levels as we live in a cul de sac and we all know each other and we have no crime here
- * We are extremely concerned about the noise levels especially during building work as I work shifts and would not be able to sleep during day with the constant noise
- * We chose this house for the quiet country life & enjoy walking our dog over the fields environmentally this is also wrong to build on farming fields.
- * We do not want this building work on these fields
- * Our family lives would be disrupted by this and we would not have the same quality of life
- * Please consider our views this is a very quiet area.

Summary:

Very concerned & unhappy that the access route into the new estate and building site would be through the very narrow residential road of the Josselyns, this road already has more than enough traffic movements for the houses here already and there is not enough parking at present for the existing houses causing parking problems. We do not believe this road or Faulkerners way and mini roundabout could cope with more traffic. At peak times there is congestion on Faulkerners Wayand mini roundabout. Environmentally this is also wrong to build on farming fields.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6863 - 3812 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6863 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Mr David Mayes [3812] Agent: N/A

Full Text:

As a home owner in The Josselys Trimley St Mary for over 25yrs I am concerned about the development of housing on the two fields backing onto the Josselyns.In the summer I went to presentation by Bidwells who want to put 100 houses and flats on the mill farm site alone not including the other site which Bloor homes want to develop.My concerns for this development are (1)Access through The Josselyns is not wide enough for lorries and other heavy plant plus noise and pollution for the 2 years of development.

(2) The amount of traffic coming through the josselyns will cause a load of problems for home owners in the josselyns who have trouble now parking in the street.

(3) In the event of need of emergency an fire engine or ambulance would not be able to get down the road which is emarked for the entrance to the new site.

I look forward to hearing from you on future plans

Summary:

(1)Access through The Josselyns is not wide enough for lorries and other heavy plant plus noise and pollution for the 2 years of development.

(2) The amount of traffic coming through the josselyns will cause a load of problems for home owners in the josselyns who have trouble now parking in the street.

(3) In the event of need of emergency an fire engine or ambulance would not be able to get down the road which is emarked for the entrance to the new site.

I look forward to hearing from you on future plans

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6871 - 3818 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6871 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

N/A Respondent: Mrs Lindsey Queenan [3818] Agent:

I wish to register an objection to the plans for housing on fields adjacent to The Josselyns. **Full Text:**

> The Josselyns is a narrow road that has no footpaths in places. It is just wide enough for 2 cars to pass. There is currently a lot of on street parking in the close. This can make it difficult for cars to negotiate, lorries would find it next to

impossible.

The noise from construction traffic would be awful, ruining our enjoyment of our homes and gardens. Mud everywhere

when wet and clouds of dust when dry.

There does not appear to be any provision for schools or a doctors surgery.

It would be better if access was straight onto the High Road via the poultry farm.

Summarv: The Josselvns is a narrow road that has no footpaths in places. It is just wide enough for 2 cars to pass. There is

currently a lot of on street parking in the close. This can make it difficult for cars to negotiate, lorries would find it next to

impossible.

The noise from construction traffic would be awful, ruining our enjoyment of our homes and gardens.

There does not appear to be any provision for schools or a doctors surgery. It would be better if access was straight onto the High Road via the poultry farm.

Change to Plan

Legal? Sound? **Duty to Cooperate?** Soundness Tests Appear at exam? Not Specified Not Specified None

Not Specified Not Specified

O - 6896 - 3682 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6896 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Sarah Croucher [3682] Agent: N/A

Full Text: I am writing to you to OBJECT to the plans to build on the 2 fields on land south of Thurmans Lane in Trimley St Mary.

As a resident of The Josselyns, my main concern is the access route into the new estate and building site as this I believe would be through the narrow residential road of the Josselyns. This road already has enough traffic movements and parking problems and I do not believe this road or Faulkeners Way and the mini roundabout could cope the large volume of traffic this new estate would create. Would an alternative route be off the slip road on the A14 to go straight onto the new estate or off Howlett Way directly. This could help alleviate any further traffic issues on an already busy

narrow road.

Summary: I am writing to you to OBJECT to the plans to build on the 2 fields on land south of Thurmans Lane in Trimley St Mary.

As a resident of The Josselyns, my main concern is the access route into the new estate and building site as this I believe would be through the narrow residential road of the Josselyns. This road already has enough traffic movements and parking problems and I do not believe this road or Faulkeners Way and the mini roundabout could cope the large

volume of traffic this new estate would create.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6957 - 3868 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6957 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Mr and Mrs R Prime [3868] Agent: N/A

Full Text:

- 1. We are writing to you to object to the plan to build on the two fields on land between Thurmans lane, the Josselyns and Thomas Avenue. We understand that, subject to approval, the first part of the development will begin on the 1st of June 2016 and that access to the development will be via The Josselyns and will continue for up to 2 years.
- 2. The Josselyns is too narrow to take all the construction traffic. Service vehicles parking on the road and cars entering and exiting driveways cause enough problems already and with all the extra vehicles there will almost certainly be continuous snarl-ups.
- 3. One suggestion heard at a recent meeting is that Thomas Avenue could be included to make a one way system for construction vehicles. This sounds like a good way to spread the misery as this would eventually become part of the development and double construction traffic.
- The Faulkeners Way approach to The Josselyns always has cars parked on the left hand side as you approach the junction always at least 3 cars and on a few occasions recently 13 cars. This can make getting out of the Josselyns quite dangerous because of the restricted view and the continuous flow of traffic on Faulkeners Way.
 We do believe that the local developments will go ahead but much more thought needs to be given to
- We do believe that the local developments will go ahead but much more thought needs to be given to the manner in which it is carried out.
- 6. We believe that any such developmment, must for planning purposes, include the following areas.
- a. Land off Howlett Way Trimley St Martin SHLAA Reference 451c & 451d...
- b. Land South of Thurmans Lane, Trimley St Mary -SHLAA Reference 383f & 451f.
- c. Proposed area to be protected from development this separates the land at a and b above and is bounded by Thurmans Lane and Church lane.
- 7. Whilst we appreciate that the protected land contains two churches and several old/historic buildings we consider that the total area set aside is too large particularly as several houses in Thurman Lane are already within yards of the development at 6b above. In our view the protected land next to the A14 could be given up to enable an access road to be build from Howlett Way to the back of the Josselyns and Thomas Avenue. This road might perhaps run alongside the existing footpath.
- 8. By including the Howlett Way development area from the start construction traffic would be travelling along a dedicated road fit for purpose and causing very little disruption to existing traffic levels on The Josselyns and Thomas Avenue. These two roads will in any event become even busier as houses are built and lived in on average each house sold will produce 2 extra cars to add to existing levels of traffic.

Summary:

The Josselyns is too narrow to take all the construction traffic. Service vehicles parking on the road and cars entering and exiting driveways cause enough problems already. The Faulkeners Way approach to The Josselyns always has cars parked on the left hand side as you approach the junction. This can make getting out of the Josselyns quite dangerous because of the restricted view and the continuous flow of traffic on Faulkeners Way. Site to be protected from development to be given for housing stretching from Howlett Way to Thurmans Lane would be more appropriate.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6987 - 3873 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

6987 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: A Backshall /B Annas [3873] Agent: N/A

Full Text: I am writing to you to inform you that my partner and I strongly object to the plans to build on the two fields on land

south of Thurmans lane Trimley St Mary. We live in The Josselyns close to these fields. We have only recently moved to the area and chose Trimley St Mary as it is a quiet village and our house has lovely farmland views. Building on the

fields will cause huge problems for us, our neighbours and more importantly our road.

The biggest concern is that the access route onto the building site and the new estate is apparently going to be through our narrow residential road of the Josselyns and past my living room window! It is already difficult for my partner and I to park outside our house comfortably and having more traffic passing through would be a nightmare. Faulkners way and the mini roundabout already have enough traffic as it is and we strongly disagree with it being used as an access route

to a new estate. Our roads are just too narrow and unfit for building site vehicles.

In conclusion we strongly disagree with building houses on farming fields. These fields add to the charm and tranquility

of our village and we wish for them to be left alone.

Please consider the resident views.

Summary: The biggest concern is the access route onto the building site and the new estate is apparently going to be through our narrow residential road of the Josselyns and past my living room window! It is already difficult for my partner and I to

park outside our house comfortably and having more traffic passing through would be a nightmare. Faulkners way and the mini roundabout already have enough traffic as it is and we strongly disagree with it being used as an access route

to a new estate. Our roads are just too narrow and unfit for building site vehicles.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7072 - 3889 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7072 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Mr Mark Williams [3889] Agent: N/A

Full Text: I own a home in The Josselyns and I strongly object to the plans to build on the 2 fields on land south of Thurmans

lane Trimley St Mary. My house only has one outlook and that is the fields bordering the Josselyns, so not only will the only view be ruined, but good farming land will be lost and the plans will severely impact on the local wildlife in the area, which is very important to me, due to the potential damage to the hedgerows surrounding the fields and scrub habitat of the adjoining land. My main objection and concern is the proposed access route into the new estate and building site, as this would be through the narrow residential road of the Josselyns very close to my house, we suffer parking problems already and this narrow road is not suited to the heavy plant and delivery lorries which will be required to undertake the building development. Also, I do not believe The Josselyns, Faulkeners way and the min roundabout [joining to the high road] would cope very well with the increased level of traffic. The queues to get on to the main road already have problems at peak time. I feel this route is unacceptable, as the potential for accidents and congestion

problems will be greatly increased.
Please do not build in this area, as I strongly believe that Brown Field development is a much better ecological and

sustainable development model.

Summary: My main objection and concern is the proposed access route into the new estate and building site, as this would be

through the narrow residential road of the Josselyns very close to my house, we suffer parking problems already and this narrow road is not suited to the heavy plant and delivery lorries which will be required to undertake the building development. Also, I do not believe The Josselyns, Faulkeners way and the mini roundabout [joining to the high road] would cope very well with the increased level of traffic. Brownfield development is much better ecological and a

sustainable model.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7073 - 3890 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7073 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Mr James Hazelwood [3890] Agent: N/A

Full Text: We have grave concerns about houses being built on the field next to The Josselyns Trimley St Mary IP11 0XW

The entrance off the high road is not wide enough with all the cars parked either sides of the road

our quiet road will no longer be with 400+ car and pedestrian movements a day which is totally unacceptable for a

village side road

the building work which will take two and a half years will be noisy and messy and the construction LORRIES will sit

along the road 7days a week with their engines running waiting to get into building site until it opens at 8am

there will be parking problems as the newbuilds never have enough parking

our road is to narrow to cope with this traffic

for the dog walkers there will no longer be lovely field walks as they are planning to build on both fields

IT WILL BE TOO DANGEROUS TO LEAVE YOU CAR OUTSIDE YOUR HOUSE

This will effect our quiet neighbourhood Please note our Strong objection to this plan

Summary: our quiet road will no longer be with 400+ car and pedestrian movements a day which is totally unacceptable for a

village side road

the building work which will take two and a half years will be noisy and messy and the construction LORRIES will sit

along the road 7days a week

there will be parking problems as the newbuilds never have enough parking

our road is to narrow to cope with this traffic

for the dog walkers there will no longer be lovely field walks as they are planning to build on both fields

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7082 - 3893 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7082 Comment

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Charlie Burton [3893] Agent: N/A

Full Text: As a resident of The Josselyns (ip110xn) it has obviously come to our attention of the planned new builds on the

farmers field behind our houses, I'm aware the village needs more houses. And my email isn't in concern of the houses, it's solely concerning the access, as the Josselyns, just isn't a wide enough road for the amount of cars trying to access houses, the pinch point outside number 45 and the curved garden wall is just the width of 2 cars. Adding to that the mini roundabout. Rush hour traffic would just grind to a halt. I'm aware Thumans lane has poor access but surely by adding a set of traffic lights, at least a portion of cars could leave out there. Thomas avenue has much wider access, in fact, the road was designed to be carried on. Where as The Josselyns has a pavement around the 'end' that's being proposed as access, implying it was never intended as an continuation of The Josselyns roadway. I'm sure a one way lane into 'the

new build' would be safe enough but a full 2 lane 2 direction road just won't work in that location

Summary: the Josselyns isn't a wide enough road for the amount of cars trying to access houses. Adding to that the mini

roundabout. Rush hour traffic would just grind to a halt. I'm aware Thumans lane has poor access but surely by adding a set of traffic lights, at least a portion of cars could leave out there. Thomas avenue has much wider access, the road was designed to be carried on. I'm sure a one way lane into 'the new build' would be safe enough but a full 2 lane 2

direction road just won't work in that location

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

S - 7120 - 3898 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7120 Support

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

N/A Respondent: Sharon lannuzzi [3898] Agent:

Full Text: I am writing in response to the invitation for local people to give their opinions on the proposed plans for the peninsular.

70 houses on land opposite the Hand in Hand - not in favour

The Hand in Hand is a Grade 2 listed building as is the cottage adjacent to the right hand side of the field. Possibly there are other properties in that area that are also listed. There are already 60 house being built on the Mushroom Farm site so to add an additional number of houses on that scale would create an estate. The Mushroom Farm site will create additional traffic however the roundabout will aid this. To create another entrance further up will create extra traffic and the additional houses would spoil the village feel to the area and spoil the view for houses in that area. The Trimley Sports and Social Club is an excellent social venue for our area. The committee have worked hard on limiting outdoor noise. I would be saddened if new residents complained about noise levels and this venue was forced not to stage events for the local community.

300 houses Howlett Way - Not in favour

As one of the organisers of Trimley carnival, I would not be in favour of that number of houses being located there. Howlett Way is a 'pinch point' when the procession passes. 300 houses would create an awful lot of traffic during rush hours and affect school traffic on the High Road. Our 2 Trimley Schools are running almost at capacity for pupil numbers. Where would these families be schooled? Could The Academy cope with extra numbers? If our Trimley Schools needed expanding, where would the revenue come from? School budgets are currently stretched.

100 houses off Thurmans lane/Thomas Avenue - In favour

Providing the access to these houses is via Faulkeners Way, from Thomas Avenue/The Josselyns, this proposal does make sense. The houses would be built onto an existing estate on land adjacent to the A14. The number of houses may need to be reviewed to ensure they do not impact on houses in Thurmans Lane/Church Lane.

Sunday Market Site - in favour

Unfortunately the Sunday market has fallen into decline in recent years and the current number of stalls can be easily managed on the Mannings site. Therefore it makes sense to build on this piece of land to improve the visual impact of this piece of land and tie in with the nearby regeneration of Martello Park.

With regard the proposal for houses in Walton near the Academy, I feel I would need more information before making a decision.

I look forward to hearing about future developments with these proposals.

Summary:

Providing the access to these houses is via Faulkeners Way, from Thomas Avenue/The Josselyns, this proposal does make sense. The houses would be built onto an existing estate on land adjacent to the A14. The number of houses

may need to be reviewed to ensure they do not impact on houses in Thurmans Lane/Church Lane.

N/A Change to Plan

Sound? **Duty to Cooperate? Soundness Tests** Legal? Appear at exam?

Not Specified Not Specified Not Specified Not Specified N/A

C - 7143 - 744 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7143 Comment

Housing Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

Respondent: Historic England (Sir/ Madam) [744] Agent: N/A

Full Text: Re: Preferred Options Public Consultation (19th October - 30th November 2015)

Felixstowe Peninsula Area Action Plan

Thank you for your letter dated 15th October 2015 regarding the above consultation. We have had the opportunity to assess the letter and consultation documents and can offer the following. Please note we have provided comments on the Site Allocations and Area Specific Policies within a separate letter to you dated the same. This follows a previous consultation and our comments dated 25th February 2015.

In terms of our general comments:

Recent Guidance from Historic England

We have recently published guidance on the Historic Environment and Site Allocations. Where we have not made comment below some additional guidance on ensuring a positive strategy for the historic environment is secured within the Felixstowe Area Action Plan can be seen by following this link- http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/.

In terms of our site specific comments:

Housing Sites

FPP4: Land north of Walton High Street, Felixstowe (451g)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the possible impact on the setting of two Listed Buildings, Grade II* Listed Walton Hall and Grade II Listed 362 High Street. We highlighted that the principal elevation of Walton Hall faces north and overlooks site 451g. It was considered that development here would urbanise the setting of this important, highly designated heritage asset, resulting in harm to its significance. It was expressed that harm would also be caused to the Grade II lodge and we strongly advised that an alternative site was found for development, though it was thought that there may be scope for some limited development at the eastern end of this site. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. The policy does however highlight that the development will need to be sympathetic to the Listed Buildings found at Walton Hall and 362 High Street. Whilst this would go some way to allay our concerns we still recommend that whilst it is considered the site can take a level of development there would be a detrimental harm to the setting of the Listed Buildings if the whole site is developed. If the site is to remain in the plan we would advise that the western end of the site is left relatively undeveloped to help protect the setting and it is considered that this side of the site might lend itself to fulfil the Public Open Space requirement.

FFP5: Land north of Conway Close, Felixstowe (502e)

We welcome the acknowledgment of the Listed Buildings and the requirement that development will need to be sympathetic to the Listed Buildings within the policy. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FFP6: Land opposite Hand in Hand Public House, Trimley St Martin (451b)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of two Grade II Listed Buildings (the Hand in Hand public house and Nos 251 and 253 High Road). We highlighted that both these buildings are traditional vernacular structures that date back to the agrarian origins of the village, and their current proximity to open countryside contributes to their setting and significance. We therefore encouraged the Local Planning Authority to identify alternative sites if at all possible so that the setting of these two buildings might be protected. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. However, it is also acknowledged that the policy requires a village green to be included within the scheme. The village green is to front High Road in order to reduce the impact on the setting of the Hand in Hand public house and this is particularly welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP7: Land off Howlett Way, Trimley St Martin (451c and 451d)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of the two Grade II listed churches and the Grade II listed Old Rectory. Whilst it is acknowledged that the consideration of the setting of the rectory is included within the policy, and this is welcomed, we would advise that the setting of the churches is also included. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP8: Land off Thurmans Lane, Trimley St Mary (383f and 451f)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of Grade II Listed Building Mill Farmhouse. It is acknowledged that there is a requirement in the policy that the development will need to be sympathetic to the setting of the mill and this is welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

Town Centre

FFP14: Felixstowe Town Centre and FFP15: Retail Frontages

As outlined within our response to you dated 25th February 2015 it is considered these policies should cover

C - 7143 - 744 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7143 Comment

Housing

Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

conservation and design issues. It is considered the policies should highlight the importance of retaining or restoring historic shopfront features both in terms of the positive contribution historic shopfronts make to the character of an area but also the economic benefit of providing traditional and bespoke shopping units to shopowners. A good example of how historic shopfronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a National success. The council have also seen a ripple effect of surrounding properties being restored. As well as including conservation and design issues within these policies the Council could consider additional advice within a Supplementary Planning Guide on Historic Shopfronts, especially given the importance and contribution the Historic shopping areas within the settlements of Suffolk make to the wider area.

District Centres

FPP17: District Centres

As above it is considered that this policy should cover conservation and design issues. It should highlight the contribution the Historic Environment makes to the economic success of district centres and seek to protect and enhance both the setting of historic assets and assets themselves.

Tourism and Sea Front Activities

We welcome the inclusion of a section which covers tourism and seafront activities. It is considered that point 6.03 on page 61 could also acknowledge and highlight the wider and more general positive contribution to Felixstowe that heritage tourism brings.

FFP18: Felixstowe Ferry and Golf Course, FFP19: Felixstowe Ferry Golf Club to Cobbolds Point, FPP20: Cobbolds Point to Spa, FPP21: Spa to Martello Park and FFP22 Martello Park to Landguard We welcome and support the acknowledgement and required protection of the historic qualities of these sections of the coast

FPP23: Car Parking

We welcome the 'high quality of design' requirement relating to replacement car parking at point 6.36 on page 72. It is considered that this requirement should be included within the policy itself to give it more weight in decision making.

The Environment

We welcome the inclusion of a section on the Historic Environment which sits separately from landscape and ecological elements. We also welcome the section on Locally Listed Buildings and Features. It is considered the Historic Environment section should also highlight Felixstowe's archaeology.

It is acknowledged that no individual policies on the Historic Environment are proposed for the Area Action Plan itself, relying instead on saved policies within the Core Strategy and the National Planning Policy Framework. The Core Strategy does not have a specific historic environment policy, with certain aspects covered in other policies such as SP15 (Landscape and Townscape) and DM21 (Design Aesthetics) and policies for specific settlements. It is considered that there is a lack of a clear strategy relating to the Historic Environment, relating to local issues, at present, and we would encourage greater clarity. This should set out the Council's approach to the management of designated and non-designated heritage assets (including archaeology) and how issues such as heritage at risk will be tackled. It is considered that a Historic Environment Policy could be locally specific to cover the Felixstowe Peninsula Area Action Plan.

In addition to the above it is acknowledged that the issue of Felixstowe South Conservation Area At Risk is not being covered by the Plan. We therefore reiterate our previous comments as follows, it would be advantageous if the Area Action Plan identified specific policies to help remove it from the register. These might include utilising the conservation area appraisal to identify locally important buildings that contribute positively to the conservation area, and introduction Article 4 directives to protect such buildings. There may also be sites which are considered negative contributors to the character and appearance of the conservation area and the preparation of development briefs for such sites might help bring forward positive redevelopment. The conservation area survey identified the loss of architectural detail as a significant problem, and consideration might therefore be given to applying to the Heritage Lottery Fund for a Townscape Heritage programme for the area, or a smaller partnership scheme with Historic England to reinstate lost architectural details on key buildings. We would therefore still recommend the inclusion of a policy which tackles the issues at Felixstowe South Conservation Area.

FPP26: Areas to be Protected from Development

In our response to you dated 25th February 2015 we expressed concerns regard the inclusion of all the sites in Trimley St Martin which would in effect surround a number of Listed Buildings including Grade II listed churches, the Grade II listed Old Rectory and Grade II Listed Building Mill Farmhouse. We recommended the inclusion of an area to be protected from development which would protect the remaining green wedge and as a result protect the setting of a number of Listed Buildings. It is acknowledged that the green wedge within Trimley St Martin is proposed to be included within the Areas to be Protected from Development and this is particularly welcomed and supported.

FPP27: Historic Park and Garden

We welcome the inclusion and the content of this policy.

C - 7143 - 744 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7143 Comment

Housing

Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

Other Issues

Coastal Change Management and Areas of Flooding

We welcome the inclusion of this section. It is considered this section should also contain a paragraph on issues and opportunities of climate change and flooding relating to the Historic Environment. Further guidance on flooding issues can be found here- http://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/.

For information and for further policy consultation please note our new consultation email address for the East of England, eastplanningpolicy@HistoricEngland.org.uk.

Summary:

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of Grade II Listed Building Mill Farmhouse. It is acknowledged that there is a requirement in the policy that the development will need to be sympathetic to the setting of the mill and this is welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot Specified

O - 7159 - 3900 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7159 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

N/A Respondent: Monica Rowlandson [3900] Agent:

Full Text:

We write in opposition to the proposed new build to take place on the green space adjacent to Thurmans Lane, The Josselyns and Thomas Avenue in Trimley St Mary.

In the first instance we will address the poor attitude in respect to the open discrimination displayed regarding the two of the three roads that will come into the allegedly planned scheme. We are led to believe that the main artery into the building site will be The Josselyns, because Thomas Avenue is deemed to be in the mid market section of the current sales culture and does not need to be considered as a route, that the Josselyns is a more suitable direction as we fall in the lower end of the housing market. That is discrimination in it's most blatant form and is most un-professional and unacceptable in this current climate.

We will now direct our attentions to the adverse effect on The Josselvns, Faulkeners Way and the remainder of the village, for that matter, that this recommendation of 'helping shape the future of the Felixstowe Peninsula' will have . We currently reside in a weight restricted area, which would be blatantly disregarded, when the recommended building work commences. Because the delivery of site management huts, an obvious must have, will need to be delivered by HGV units and trailers, plant will be delivered on low loaders, sometimes by sub-contractors and not always the building company themselves, extraction of soil will be transferred by tipper trucks all of which will flout the weight limit restrictions, destroy the road surface and leaving unwanted debris, due to overall weight and design, please do not use the 'access only' waiver - weight limits are there for a reason, and burdening the local community is not one of them. It would be prudent to evidence your strategy on this particular activity. This can and will only lead to general mockery by others of the weight limit process. In addition we will be forced to endure additional parking problems not only within our own community but those induced by site management, contractors and workers.

What processes are in place for those residents who will suffer financial loss and undue distress, all due to the unwanted invasion of this allegedly much need expansion program? Destroying the road surface alone, will undoubtedly leave many of us with unacceptable high levels of car maintenance, this reflects heavily on the amount of elderly residents established in the proposed area, those unaccustomed to such invasion. Some of us, especially those located at the mouth of the site, will be forced to accelerate cleaning programs due to unwanted ingress of dirt, dust and general inconvenience. What actually is in place to placate those who will suffer? Nothing we assume because 'shaping the future' is the only thing that matters irrelevant to local community opinions. In addition what percentage of this so needy new build will go to 'social housing' 20%? An absurd amount no doubt. Your answers will be appreciated even if we consider they will be somewhat evasive.

As we are all aware, those of us that have acumen, projects such as these have the ability to destroy and demean the local community, bring frustration and unhappiness. Go ahead, subvert our idyllic setting, induce unhappiness, condemn wildlife to a minute area of land and bring an area of exquisite beauty falling to it's knees in a promiscuous demise.

Summary:

We currently reside in a weight restricted area, which would be blatantly disregarded, when the recommended building work commences. Because the delivery of site management huts will need to be delivered by HGV units, plant will be delivered on low loaders, and not always the building company themselves, extraction of soil will be transferred by tipper trucks all of which will flout the weight limit restrictions, destroy the road surface and leaving unwanted debris, due to overall weight and design, please do not use the 'access only' waiver. It would be prudent to evidence your strategy on this particular activity.

Change to Plan

Sound? **Duty to Cooperate?** Appear at exam? Legal? Soundness Tests Not Specified Not Specified Not Specified Not Specified None

O - 7173 - 3162 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7173 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Denise Scott [3162] Agent: N/A

Full Text:

Whilst I appreciate the need for new housing in the Felixstowe peninsular I cannot see how all these houses in the villages of Trimley St Martin and St Mary can be justified. The road is busy now as people DONOT use the A14 to go in and out of Felixstowe and it is further gridlocked whenever there is an accident on A14 Presumably the Thurmans Lane access though Josselyns will create problems on the High Road

The on going development on the mushroom farm has access via the roundabout which is an excellent but how many of these cars will

- (a) turn left to go towards the A14
- (b) turn right to Felixstowe instead of going straight to the Kirton roundabout and on to the A14

Which brings me to the proposed development at the old poultry farm will the access be onto Howlett Way or the roundabout on High Road?

The proposed dwellings opposite the Hand in Hand will generate even more cars on this busy section and the concreting of land will I am sure result in more surface water run off. It mentions that this development will not go beyond 21 Grimston Lane presumably so the farmer can still access some of the agricultural land

The drains sewers are outdated can they take any more development without being updated

When I mentioned to your officer at the consultation why is the infrastructure not sorted before building houses he said that's the way it is!

Of the preferred options if we MUST have some dwellings I suppose the old poultry farm development seems the logical choice accesswise which hopefully will not result in more cars using the high road through our villages.

And hopefully this being a larger development of mixed houses will include some affordable houses for the younger generation of the village.

With all these proposed dwellings the villages will become suburb of Felixstowe.

Summary:

Whilst I appreciate the need for new housing in the Felixstowe peninsular I cannot see how all these houses in the villages of Trimley St Martin and St Mary can be justified. The road is busy now as people DONOT use the A14 to go in and out of Felixstowe and it is further gridlocked whenever there is an accident on A14 Presumably the Thurmans Lane access though Josselyns will create problems on the High Road

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7178 - 3821 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7178 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: lynn beal [3821] Agent: N/A

Full Text:

We are writing this to show our concern to the proposed new development on the 2 fields on land south of Thurmans lane Trimley St Mary and that we strongly object to the plans to build here.

We have lived at The Josselyns for 24 years and are next to the field at the end by the proposed road into new estate the whole development and site access will be adjacent to the frontage of our home. If this goes ahead our front door is 3 meters away from building site entrance this is totally unacceptable, our front door opens directly onto path so my new carpets would be ruined with the construction mess. We like the vast majority of our neighbours have lived in this road a long time for the quality of life we would lose this if this area was developed.

And this will bring huge problems to our road, our main concern is the access route into the new estate and building site which is past my front window, as this would be through the narrow residential road of the Josselyns, which already has more than enough parking problems for the existing homes here now. My parking space would join the road and I would find it difficult to access this and I do not believe this road or Faulkeners way, the mini roundabout & High road could cope with more traffic. There are other possible routes into this new development with access directly to the high road with less disruption to the Josselyns and Faulkeners way and existing housing estate.

We feel that the route will cause years of disruption to the homes and lives of the residents as well as our own. Our main objections are:

- * Building Site entrance 3 meters away from my front door! this is totally unacceptable
- * The road for building site & estate through the narrow residential road of The Josselyns
- * Parking during construction with building vehicle's parked outside my front window waiting to get on to building site
- * Parking caused but new residents
- * Safety of contamination from the development (we have pets& husband has respiratory problems)
- * Volume of heavy goods/construction traffic
- * Potential 200/400 new traffic movements per day
- * New traffic calming measures
- * Disruption to my sleep pattern while on shift work
- * I do not agree with the building of houses on farming fields
- * The noise and mess the building would create
- * The loss of the wildlife
- * The damage to our road which was not designed for heavy goods this road is already cracked
- * The trimley high road is already congested at school entry times and this includes the area around the Felixstowe Academy.

Please consider our views on this.I do hope you also take seriously our neighbours objections.

Summary:

- *The road for building site & estate through the narrow residential road of The Josselyns
- *Parking during construction with building vehicle's parked outside my front window waiting to get on to building site
- *Parking caused but new residents
- *Volume of heavy goods/construction traffic
- *Potential 200/400 new traffic movements per day
- *New traffic calming measures
- *I do not agree with the building of houses on farming fields
- *The noise and mess the building would create
- *The loss of the wildlife
- *The trimley high road is already congested at school entry times and this includes the area around the Felixstowe Academy.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7261 - 3934 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7261 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

Respondent: Mr & Mrs Williams [3934] N/A Agent:

Preferred Options Public Consultation Response form **Full Text:**

*□Do you think that the Council has selected the most appropriate preferred options?

- * Are the policy requirements justified and do they meet the needs of the local community?
- * Can you suggest a more suitable approach than that outlined?
- Are there any other alternative options that need to be considered?
- * Do you agree with the findings of the sustainability appraisal assessments undertaken?
- * Do you have any other comments on the preferred options documents?

Please indicate to which document your comments relate to?

Felixstowe Peninsula Area Action Plan

*□Do you think that the Council has selected the most appropriate preferred options? In short, sorry, but No...

Although one or two small scale sites within the town and Thurman's lane (ref 383f &451f)would seem to be logical extensions of existing past development which, with suitable precautions discussed later, could be seen as acceptable use of land, the three preferred options for the Trimley villages and Walton will fundamentally change their characters.

There are several views, (Vistas if you like) clearly seen as you walk or drive around the area, that positively 'define' the demarcation of these three distinct communities.

These demarcation, `vistas, ` can be seen, from the high road, the A14, or both.

If the preferred options, shown are used, then these demarcations and vistas will be lost forever, and a homogenised sprawl, from the sea, to the very edge of the Trimley's will be inevitable.

With further likely expansion taking place during the next stage (2027) there is a high probability that any remaining gaps will be 'filled in,' as the precedent will have then been established.

I have indicated these vital sightlines on the modified map at the end, along with possible alternative and equivalent sites I refer to the preferred options (PO)

- 1) for land off Howlett way ref 451c &451d
- 2) land North of High Street, Walton ref 451g
- 3) land opposite Hand in Hand public house ref 451b
- 4) land North of Conway close ref 502e

the SE view from Howlett way looking towards Felixstowe, across agricultural land gives a clear separation, from the substantially developed estates on the other side of this road, looking NW.

This is further reinforced by the view SW across to the Orwell, Albeit, at this stage, outside the red boundaries but in 2027, that too, could change?

The ongoing `Mushroom farm` development, has happily not significantly spoiled this perception of open countryside. This PO area, surrounded by footpaths, is extensively used by local residents of both communities, for horse riding, dog walking, and rambling, precisely 'because', the area, is, undeveloped.

Substantial bird and wildlife thrives within the area and is a valued resource for enjoyment.

A similar area could be produced, if the boundaries were extended north, to the other side of the A14 (shown on modified map - see attached document) that would prevent coalescence along the high road and reduce traffic impact, along the high road substantially, as easy access to A14 is possible.

2) Land North of High Street, Walton ref 451g

The wide demarcation of Walton and Trimley St Mary, is clearly seen and felt, when looking north from the high road, but hardly noticeable (due to banking), when looking South from the A14/A15d.

If this PO is used, Walton will simply merge into one with Trimley St Mary..... Especially as it is opposite an existing, approved planning application for a large development, the result ... Horrible!

However along the N boundary a smaller 'strip' development could, with good tree screening, and substantial setback, still not affect this natural gap too profoundly, giving say 200 -300 homes?

Again the land north, on the other side of the A14 would give a similar area and have easy access onto the roundabout,

still leaving good vistas from the road as shown on my modified map [see attached document].

3) Land opposite Hand in Hand public house ref 451b

The spectacular views, looking South across the country side from the` Hand in hand` area, will be destroyed even if only a single frontage was permitted, and of more concern 'allow' an entirely feasible, further expansion to the railway in 2027, once the excursion across the high road is established.

Although fortunately in this case, it would not 'link' two separate communities, just extend one.

However, if the area NE, and opposite Goslings farm were to be used, a similar area with good access would be available, without extending the extent of the village inordinately?

4) Land North of Conway close ref 502e

The other preferred option north of Conway close, looks innocent enough, until again, it is realised that adjacent land to the East, has already been granted planning permission, so the `white` area is somewhat misleading, as that

O - 7261 - 3934 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7261 Object

Housing

Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

development has already removed the view for the existing residents.

But it use would not appear to coalesce any discreet areas, as 1) and 2) do, so like 3) is mainly the expansion of an existing community.

The two `orange` areas of no permitted development, are certainly needed.(and appreciated)

Of concern however, is once the preferred options are established, it takes no great stretch of imagination to surmise that these two areas of `no development` will be the next to be `filled in` when the AAP is reassessed in 2027.

If that were to take place, any pretext of individual villages and communities would then be farcical.

If alternative options could be chosen, either as suggested or elsewhere by yourselves, it would be far less likely that everything could be amalgamated later.

- * Are the policy requirements justified and do they meet the needs of the local community?
- * Can you suggest a more suitable approach than that outlined?
- * Are there any other alternative options that need to be considered?
- * Do you agree with the findings of the sustainability appraisal assessments undertaken?
- * Do you have any other comments on the preferred options documents?

The other questions posed above require, I feel, a slightly different approach and response.

I have read through countless documents, counter arguments and counter proposals, about the need for this many homes, employment, infrastructure etc, from 2009 until 2012 when the basic framework was established by the government/local government.

These discussions were far more eloquently expressed by the S.T.A.G (Save Trimley Against Growth) and N.A.N.T. (No Adastral New Town) representations, than I could possibly achieve, and yet failed to modify the `official` stance.

Therefore I feel the above battles have been fought and lost long ago, and now we are at the `Damage limitation` stage of the proceedings, although hopefully this will nonetheless be productive.

Similarly the sustainability assessments, apart from being largely unfathomable, use criteria that will always be subjective, and can be `adjusted` to suit the needs of the chosen decision.

These 'battles' have likewise, been argued over and lost long ago.

Finally, It would be naive, not to perceive the hand of Trinity College in all of this, especially since their `Vision` of `their` land was published a few years back, and their `influence` when attempting to realise the maximum return for the land, with no real empathy for everyone affected.

This at least leaves us with at least the possibility of 'tinkering' with the preferred options, using yourselves, as our 'voice' and 'buffer' to make these decisions slightly more 'palatable' to all of us who 'will' be affected.

Therefore my next section will be on those preferred options but here is my take on the areas which may affect less people, but the land may not be that (cynically) chosen by Trinity College.......

[see attached document]

Site Allocations and Area Specific Policies

* Do you have any other comments on the preferred options documents?

As mentioned under my comments on the `Felixstowe Peninsula Area Action Plan`, I am assuming those options, will now likely go ahead regardless, and we are in a sort of `damage limitation` stage?

The preferred options for land off Howlett way ref 451c &451d

I know well the cliché "Not in my backyard" but in this instance it `IS` very much in our backyard, and obviously we/all, the existing tenants who are affected, have a vested interest, especially as we have `in` vested` considerable money and time to live here, and for all the qualities of life, it provides.

Equally, for all my working life, my career was in the building industry, including design and planning, before finally teaching it to HNC level. Therefore I do know, that a well thought out development, can work, and work well, and executed sensitively, need not unduly destroy an area.

So what were the reasons we chose to live here, and what features need to be protected, so that many more can share and enjoy this resource, should they soon live here, with ourselves...?

Well the area where we live has some wonderful and surprising features, which make it, just what it is... Simply put, it is pure Countryside.....

Entering from the high road, and within barely 10m of walking down Thurmans, or Church lane, you immediately disappear into an archetypical `English` setting, unspoilt in a hundred years as evidenced by photos. Leaves and mud on the road greet you as you walk down. The bustle and noise fade rapidly away, and then you emerge into a 100 acre field where fox and rabbits play.

A rich variety of birds sing in the foliage and crops. You give a greeting to a horse and rider, then a walker, for there are many.. Traffic although near, sounds distant, and fails to spoil the setting.., you can enjoy the big skies, with its sunrises and sunsets, or If you chose `Dark` starry nights, with owls, and fox's cries, and distant lights through the rustling trees......,

O - 7261 - 3934 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7261 Object

Housing

Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

All this, within the boundaries, of three busy roads. A true haven of peace within....

Any future development should endeavour to preserve all of this, especially for the existing tenants, and by incorporating such features, it would surely benefit any new dwellers life too, even if only at its peripheries, for then, they too, could walk with ease into this time warp or jet off down the A14 to town as is their choice, as we do.

There are also two, one hundred year old oaks in the centre that do not appear to have TPOs on them, but would surely be an asset within an open area for the development?

Likewise, a 1940s WW2 `pillbox` remains that should be preserved for posterity, and could easily become a feature within a development, either as a viewing platform (it has steps to a walled roof as it was also an anti aircraft position) or like the control tower at Martlesham Heath, a heritage site with information displays and focus of a park area.

My modified map [see attached document] shows some ideas that could help achieve this, but the simple principals are, to shield old from new, by leaving a broad band of untouched land (say 15m) around the boundaries with a screening of trees, that would preserve countryside views from both sides, and leave all the above, for all to enjoy.... Oh, And soft street lighting PLEASE, for preserving the dark night skies...Most planners, forget that, important feature of the `countryside`

It is paramount (and very much appreciated) that both Church lane, and Thurman's lane, are to be classified as `protected` lanes, and not to be used for access, to any new developments.

These peaceful routes provide part of that countryside experience. Please, cast this decision irrevocably in Stone. Any increase in (vehicle) traffic would destroy them.... Walkers and cyclists welcome...

The orange area to be protected from any developments is also vital to preserving this encircled haven of our countryside, so easily accessible from both Trimley villages.

It will also maintain that important historical separation of them.

Finally, the protected area should, provide an alternative home for the displaced, birds and wildlife, especially if several dead trees are replaced and give that haven of tranquillity for them within, for all of us to enjoy.

Thank you for protecting it, But again, please cast it in stone for all perpetuity, as it is only too easy to `fill it in later`, with the loss of all of the above.

[see atached document for revised maps of following:]

Land off Howlett way ref 451c &451d Land south of Thurmans Lane Ref 383f & 451f

This development, like Howlett way above, will affect existing tenants on three side. But with similar peripheral treatment of screening trees and scrub type band, will again separate both new and old from both directions.

Not allowing Thurmans lane to be used for access will preserve the `haven` of timeless countryside within the orange protected zone for both communities and indeed forms a circular route for both Trimley's

Land North of High Street, Walton Ref 451g

This area provides a clear division between Walton and Trimley St Mary, when looking North from the high road, but barely visible from the A14 /A15b

As this must also be taken in conjunction with the approved development opposite behind Walton hall, it would seem imperative to keep any development screened from the high road.

The old stables and Dutch house, will help this illusion, but need to be extended along the entire High Road frontage, with a decent `set back` to a solid new tree line.

And now to another 'vested interest....

The need to have the rifle club relocated before any development can continue (Para 3.27)

Could easily be made redundant, if the club could remain where it is. The club has no desire to move.

It would also provide the buffer mentioned in Para 3.29 and is a natural visual break along with the old stables for demarcation of the areas

Any possible noise issues could be solved with banking and/or trees as with the accepted C13/0967 planning application for elsewhere

For the developer, the small loss of building land would be offset by the ability to start work forthwith. The club has a strong affiliation with Mencap, RNIB and national sports bodies, a real asset to the local populace, that could easily disappear if evicted, as we are never likely to raise enough money to do so..

[see atached document for revised map of following:]

Land North of High Street, Walton Ref 451g

Sunday market site sea Rd ref 1011c

O - 7261 - 3934 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7261 Object

Housing

Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

Although not part of the argument for preserving historic `vistas` (indeed it was once a building)

the choice to develop the Sunday market will deprive the town of one of its significant venues, for tourism, and used by hundreds of local and outside visitors.

The surrounding retailers will undoubtedly lose a significant amount of passing trade and helps keep this area `alive` and clearly part of the tourism area (Para 6.22)

I can find no mention of a similar, alternative site.

[see atached document for photographs of following:]

Havens of peace within Land off Howlett way ref 451c &451d Looking due south from drain and the old Rectory Northern boundary Possible viewing point on 1940s pillbox and the old oaks looking North End of Church lane looking North..wildlife & tranquillity reign within three busy roads

NB unploughed borders are the suggested 15mtr 'No man's land Buffer zones

Summary:

This development will affect existing tenants on three sides. But with peripheral treatment of screening trees and scrub type band, will separate both new and old from both directions.

Not allowing Thurmans lane to be used for access will preserve the `haven` of timeless countryside within the orange

protected zone for both communities and indeed forms a circular route for both Trimley's

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified Non

Attachments:

Preferred Options Public Consultation Response form.pdf

C - 7312 - 3949 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7312 Comment

Housing

Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

Respondent: Pigeon Investment Management Ltd [3949] Agent: Strutt & Parker (Mr Richard Clews) [3945]

Full Text:

1 INTRODUCTION

- 1.1 This representation has been prepared by Strutt Parker LLP on behalf of Pigeon Investment Management Ltd in respect of land at Trimley St Martin, Alternative Option Site 3022a in response to the six week public consultation (19th October 2015 to 30th November 2015) on the Felixstowe Peninsular Area Action Plan, Preferred Options Document, hereafter referred to as the Felixstowe Peninsular AAP. It should be read in conjunction with the following documents copies of which are contained within the appendices and summarised in the delivery statement section of this consultation response below:
- * Site Plan;
- * Indicative Layout Plan;
- * Preliminary Drainage Appraisal October 2015;
- * Desk-based Archaeological Assessment;
- * Landscape and Visual Assessment;
- * Preliminary Ecological Appraisal; and
- * Transport Report
- * Phase 1 Contamination Report

2 EXECUTIVE SUMMARY

- 2.1 As set out in these representations there are some fundamental concerns regarding the soundness of the Felixstowe Peninsular AAP and the Area Specific Policies Development Plan Document (DPD). These relate specifically to the approach adopted and the plan's failure to allocate suitable sustainable sites to address the issues arising from the failure to clearly identify up to date objectively assessed housing need for the District. There appears to be a conflict with Policy SP2 of the Core Strategy (2013) and the requirements of the National Planning Policy Framework(NPPF).
- 2.2 In respect of the Felixstowe Peninsular AAP, at a site specific level, the concern is that the plan fails to take the opportunity to allocate additional land at Trimley St Martin in accordance with the development strategy set out in the adopted Core Strategy. The site in question, Alternative Option Site 3022a, was identified as suitable in the SHLAA 2014.

It is sustainable, available and deliverable. It would represent a logical extension to the physical development limits of the village. In accordance with the presumption in favour of sustainable development and the need to boost significantly the supply of housing it is contended that it should be included as a Preferred Allocation.

3 POLICY BACKGROUND

- 3.1 The Site Allocations and Area Specific Policies Development Plan Document Preferred Options Consultation Document, October 2015 has been published for public consultation along with the Felixstowe Peninsular AAP. These two documents seek to provide the policies and allocations necessary to implement the strategic policies set out in the Suffolk Coastal District Local Plan Core Strategy and Development Management Policies, July 2013 document. Together the Core Strategy, Site Allocations and Area Specific Policies Document and the Felixstowe Peninsula AAP will form the Development Plan for Suffolk Coastal District Council.
- 3.2 While this representation relates to the Felixstowe Peninsular AAP preferred options document and more specifically proposed allocations in the village of Trimley St Martin, it also has to be considered in the wider context of the planning policy framework for the whole of the District.

4 NATIONAL PLANNING POLICY FRAMEWORK

- 4.1 Paragraph 14 sets out that "a presumption in favour of sustainable development" is at the heart of the Framework and describes this as "a golden thread running through both plan-making and decision taking." It goes on to state that for plan- making this means:
- * "Local planning authorities should positively seek opportunities to meet the development needs of their area;
- * Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change..."

These requirements are repeated in more detail throughout the Framework. Paragraph 15 requires the presumption in favour of sustainable development to be applied to local plan policies so that development which is sustainable can be approved without delay.

- 4.2 The Core Planning Principles set out at paragraph 17 include a set of overarching objectives which should underpin plan making. Of particular relevance to this consultation response are that planning should be:
- * plan-led with up to date plans providing a practical framework for predictable and efficient decisions.
- * Not be about scrutiny but be a creative exercise.
- * Proactively drive sustainable development to deliver the homes the country needs.
- 4.3 Every effort should be taken to objectively identify and meet the needs of the area. Sufficient land suitable for development having regard to market signals should be
- 4.4 Paragraph 47 sets out a clear challenge to local planning authorities "to boost

significantly the supply of housing..." In order to achieve this they should ensure

that their Local Plan meets the full objectively assessed needs for the area and they should identify and annually update their five year housing supply.

4.5 For plan-making paragraph 151 advises that Local Plans should be consistent with the policies and principles of the Framework, "...including the presumption in favour of sustainable development."

C - 7312 - 3949 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7312 Comment

Housing

Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

- 4.6 Paragraph 154 requires Local Plans to be "...aspirational but realistic" and paragraph 159 reminds local planning authorities that they "...should have a clear understanding of housing needs in their area."
- 4.7 Finally, for a local plan to be found sound at examination by an independent inspector the Framework at paragraph 182 advises that it should satisfy the following tests, namely that it is:
- * "Positively prepared the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- * Justified the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- * Effective the plan should be deliverable over its period and based on effective joint working on cross- boundary strategic priorities; and
- * Consistent with national policy the plan should enable the delivery of sustainable development in accordance with the policies in the Framework."
- 4.8 For the purposes of this consultation it is necessary to consider whether the Felixstowe Peninsular AAP satisfies the above objectives.

5 APPROACH TO HOUSING GROWTH

Core Strategy

5.1 At the strategic level housing numbers and distribution are set out in the Core Strategy.

Objective 2 states:

"To meet the minimum locally identified housing needs of the district for the period 2010 to 2027, taking into account existing and future economic,

environmental and social opportunities and constraints'

In respect of this objective there are two important points to note. Firstly, that the Core Strategy seeks to meet the minimum locally identified housing need, and secondly, that it is a locally identified housing need for the plan period. 5.2 However, it is considered given the acknowledged short fall that the DPD and AAP should be based on the NPPF principles set out above including; to be aspirational; provide flexibility; positively seek to meet identified needs; and most importantly, to significantly boost housing supply. It is therefore considered that the Felixstowe Peninsular AAP should be setting its own, up to date and ambitious objectives.

- 5.3 Core Strategy policy SP2 sets out housing numbers and distribution. However, policy SP2 notes that provision will be made for at least 7,900 new homes, distributed in accordance with the settlement hierarchy set out in policy SP19. The policy then goes on to commit to an early review in order to identify the full objectively assessed housing needs for the District, to ensure this is met in so far as this is consistent with the policies of the NPPF.
- 5.4 The Inspector's report in respect of the Core Strategy Examination (June 2013) made it clear that an early review was essential as at the time the Council had identified an objectively assessed need of 11,000 dwellings. At paragraph 46 of the Inspector's Report he commented:

"Even if the theoretical capacity of all the sites included in the Strategic Housing Land Availability assessment (SHLAA), existing commitments potential brownfield opportunities, allocations carried forward from the previous Local Plan and a windfall allowance were taken into account, the provision would fall some way short of the 11,000 dwellings required."

5.5 At this point, the Inspector clearly gave consideration to suspending the Examination. However, he concluded that as none of the adjoining Councils had objected to the scale of housing proposed, that having a core strategy in place with an early review would be preferable to the alternative of suspension of the examination and the likely withdrawal of the plan.

5.6 While it is noted that the Site Allocations and Area Specific DPD Issues and Options consultation commenced in 2015, it is of significant concern that this occurred ahead of the objectively assessed housing needs for the District being reviewed, updated and firmly established. Policy CS2 states:

"An early review of the Core Strategy will be undertaken, commencing with the publication of an Issues and Options Report by 2015 at the latest. The review will identify the full, objectively assessed need for the District and proposals to ensure that this is met in so far as this is consistent with the policies in the National Planning Policy Framework."

5.7 On the basis of the currently available information the Felixstowe Peninsular AAP and the DPD are inconsistent with this adopted policy, and paragraph 158 of the NPPF which requires that the Local Plan is "...based on adequate, up-to-date and relevant evidence..."

5.8 Table 3.1 of the Core Strategy references the need for an extra 11,000 dwellings as identified in the work commission by Oxford Economics (OE) in 2010. It goes on to suggest that the review should identify land to meet the current acknowledged shortfall between the locally assessed requirement and the OE objectively assessed need (OAN). However, the District still does not appear to have a published understanding of its current OAN. The OE figure of 11,000 dwellings is very old and predates the NPPF. As advised in Planning Practice Guidance regarding housing need assessments, the household projections published by the Department for Communities and Local Government provide the starting point estimate of overall housing need (ID: 2a-015-20140306). The DCLG estimate may require adjustment to reflect factors affecting local demography and household formation rates. However, the Sub National Household Projections (2015) suggest a growth of 8,362 for the period 2010 to 2027 and this is not

referenced in the SAASP document or the AAP. This indicates that the Core Strategy figure promoted in the SAASP is out of date. While the DCLG figure is lower than the OE figure, it is clear that the Core Strategy proposal to provide 7,900 homes is lower than the most recent projections that the Council should be considering as a starting point for

C - 7312 - 3949 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

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understanding its OAN. On the basis that the 2010 OE figure was 11,000, the reality is that the actual objectively assessed need figure is likely to be higher than 8,362 and that 7,900 would fail to meet the OAN.

5.9 Policy FPP1 of the Felixstowe Peninsular AAP gives the impression that it is still working to the Core Strategy target of 7,900 and does not explain if it is actually working to the OE figure or some other estimate and if so what that actually equates to for the AAP. On this basis there must be a concern that at examination the Felixstowe Peninsular AAP will not be found to comply with the tests set out in paragraph 182 of the NPPF, failing all the tests.

Five Year Housing Supply

5.10 In June 2015 Suffolk Coastal District Council published a Housing Supply Land Assessment. This covers the period 1st April 2016 to 31st March 2021 and identifies the current position with regard to identifying a five year +5% supply of housing land which it assess as 5.12 years.

5.11 Paragraph 3 acknowledges the supply in 2014 was 4.3 years this is a figure which has been borne out in appeal decisions as recently as September 2015

(APPJ3530/A/14/2225141). Fundamentally, the current assessment is still based on the Core Strategy target of 7,900. As set out above, this is an acknowledged under estimate of the actual objectively assessed need, which in the absence of anything more up to date, on the best available evidence suggests a target in the region of 11,000 dwellings. 5.12 In addition, it is also observed that the projections contained in table 3 still appear to rely on the early unconfirmed delivery of some large developments with outline permission which are still subject to S106 agreements. Taking these factors into consideration the five year supply with a modest surplus of 0.12 years, must reasonably be considered vulnerable to challenge at this time. If the 11,000 dwelling figure or even the lesser DCLG Household projection of 8,362 are applied then a five year supply in all probability does not actually exist and is at best 4.75 years.

5.13 Again, this point suggests that the Felixstowe Peninsular AAP will struggle to

demonstrate compliance with paragraph 182 of the NPPF at examination and reinforces the need to allocate additional land within the AAP.

Felixstowe Peninsular AAP

5.14 The overall spatial strategy set out in the Core Strategy (see policy SP2) provides for development to be focused in the Eastern Ipswich Plan Area, at Felixstowe and the Trimley Villages and shared between the market towns. Policy SP19 identifies that Felixstowe, Walton and the Trimley Villages will accommodate a proposed housing growth of 22%. Furthermore the Strategic Housing Land Availability Assessment (March 2014) acknowledges:

"The core Strategy expects the Market Towns and the Felixstowe and the

Trimleys area to accommodate a considerable proportion of the growth identified for the district to 2027".

5.15 The Felixstowe Peninsula AAP in policy FPP1 identifies a minimum requirement for a further 807 units before 2027 as necessary to meet the Core Strategy requirement. However, as previously mentioned above these figures are a minimum and the AAP should be seeking to maximise delivery in sustainable locations in order to boost significantly the supply of housing as required by the NPPF. It is therefore contended as set out in more detail above, that policy FPP1 should be setting a more ambitious target, and in the absence of any more recent objectively assessed need, looking to a District target of 11,000 dwellings rather than the 7,900 derived from the Core Strategy. Policy FPP1 should therefore be reworded to identify a higher overall target and as such an appropriate apportionment, for Felixstowe Peninsular. 5.16 It must be acknowledged that the AAP states at paragraph 3.13:

"The Felixstowe Peninsula AAP identifies over 1,100 units on the preferred sites outlined in this document. The Council consider it necessary to over allocate sites across the district to ensure that a five year land supply is maintained which is paramount. Over allocating also provides a range of sites, sizes and locations for development to allow a choice of location for those looking for a residential property. It also takes into account that the population is growing and that the Council's objectively assessed housing need is likely to increase in the future.

The delivery of sites will be monitored throughout the plan period to consider how

the AAP is performing against the Core Strategy targets.'

5.17 While this additional provision is welcome, it is still unclear if it will provide sufficient sites, which are available and deliverable, to enable the District to demonstrate a five year housing land supply in the short term. The current five year supply is not based on an up to date objectively assessed need. It is therefore contended, that opportunities should be taken to allocate more sustainable sites that can be delivered in accordance with Core Strategy spatial strategy so that the District can significantly boost its supply of housing as required by the NPPF. These sites should allow for variety in house types and

tenures to come forward to meet local needs and ensure choice and competition in the market for land (NPPF paragraph 47).

5.18 From the statement in paragraph 3.13 the Council appears to be acknowledging that the objectively assessed need is rising and site allocations should reflect this. It would therefore seem logical, and in the interests of good planning, for them to plan to meet this need now, by way of the allocation of further sustainable sites.

Felixstowe Peninsular AAP Preferred Site Allocations

5.19 The Felixstowe Peninsular AAP identifies 7 sites as preferred option allocations. Two of these are in Trimley St Martin and one in Trimley St Mary and are identified on the inset maps in the AAP. A summary of the 7 sites is set out below along with some brief summary observations in italics which are considered relevant to this consultation response: 5.20 Preferred Policy FPP3: Land at Sea Road, Felixstowe

Land is identified at Sea Road, Felixstowe for a mixed use development of commercial /tourism uses and residential dwellings. (Indicative Capacity 40 dwellings)

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It is noted that this is a mixed use site and residential development will be dependent on

There is also an issue with sewage capacity which may impact on viability. Finally if the market has to be relocated this could also significantly delay delivery.

5.21 Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

Land is identified north of Walton High Street for a mixture of residential units; including on site open space,

comprehensive landscaping and new business units. (Indicative Capacity 400 dwellings)

This site is dependent on the Rifle Club being relocated, requires a master plan to

include a link road which could in turn impact on viability. The policy acknowledges that it is likely to be a longer term opportunity. There are also air quality and sewage capacity issues to be resolved.

5.22 Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Land is identified to the north of Conway Close for a residential development. (Indicative Capacity 150 dwellings) The site could come forward, however, there are still sewage capacity and air quality issues to be addressed and the site is adjoined by heritage assets.

5.23 Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St

Martin Land is identified on Trimley High Road for residential development with on site open space to provide a village green. (Indicative Capacity 70 dwellings)

The site could come forward with access on to the High Street. The Public House is a listed building and therefore development proposals will have to be sensitive to its status which may limit capacity.

5.24 Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

Land is identified at Howlett Way for residential development with on site open space. (Indicative Capacity 360 dwellings)

Access to the site has not been identified in detail other than off Howlett Way. There are air quality issues and concerns regarding the setting of the Old Rectory. In addition there is a water main crossing the site. The site wraps round the Old Poultry Farm and the Old Rectory both of which may delay availability.

5.25 Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

Land is identified south of Thurmans Lane for residential development. (Indicative

Capacity 100 dwellings)

This site could come forward, again it is subject to air quality issues and the need to have regard to Mill Farm a Grade II Listed Building, it will also have to be accessed through the adjoining residential areas.

5.26 Preferred Policy FPP9: Land at Bucklesham Road, Kirton

Land is identified south of Bucklesham Road for residential development. (Indicative Capacity 15 dwellings)

This is a relatively small ribbon development site which could come forward. There are potentially issues to be resolved in respect of local sewage capacity in the village.

Assessment of Preferred Allocations

5.27 If the preferred site allocations indicative capacities are totalled up cumulatively this suggests they could deliver 1,135 dwellings between them. However, as set out above the delivery, and more importantly, the quantum and likely timing of delivery is much less certain. It is noted that the two largest sites, FPP8 and FPP4 do not appear to be very advanced. With this in mind in order to maintain a realistic five year supply it will be important for the District to maintain the delivery of smaller sites which can readily come forward.

6 ALTERNATIVE OPTION SITE 3022A

6.1 The site the subject of this representation, Alternative Option Site 3022a is just such a site and accordingly it is contended that it should be included as a preferred allocation on the basis that it is available and deliverable at the present time. In addition, it does not need to overcome the issues and constraints associated with some of the preferred allocations set out above and as such can contribute to the acknowledged shortfall in housing need, within the first five years of the Plan period. It is also contended that the AAP should be more ambitious in order to meet local housing need and it would be appropriate for the site to be included based on the presumption in favour of sustainable development

6.2 When considering the Trimley Villages and the opportunities for further allocations, Trimley St Mary is the larger of the two settlements and any significant further expansion may potentially undermine the sustainability of it as a village. Trimley St Martin being the smaller of the two settlements would appear to have greater capacity to absorb further growth. Trimley St Mary is also constrained by its proximity to Felixstowe, the ANOB designation to the south-west, the A14 to the north-east and its proximity to Trimley St Martin to the north. There are therefore few obvious alternative locations for the expansion of its physical development limits. On this basis, there is considerably more potential to be looking at a further extension of the physical development limits of Trimley St Martin.

6.3 In so far as this consultation is concerned, clearly a further allocation on the northwestern side of Trimley St Martin would make a positive contribution towards housing delivery. Alternative Option Site 3022a is in a sustainable location and is not environmentally sensitive. It does not represent a risk of coalescence and is a natural and logical extension of the settlement with clear and defensible boundaries. It is contained to the north-east by the allotment gardens, by the existing built development in the western corner, the road and established settlement to the south. As set out below it is a deliverable site with no obvious constraints or limitations. It is available and could come forward very quickly to make an almost immediate contribution to boosting local housing supply. As such, it is considered that it should be identified as a preferred

residential site allocation.

Sustainability Appraisal

6.4 It is surprising that Alternative Option Site 3022a did not score more highly in the Preferred Options Sustainability Appraisal when compared to the preferred sites listed above.

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6.5 The overall assessment concluded for site 3022a as follows:

"The site scores well in terms of economic effects due to its close proximity to employment opportunities and given relatively good public transport provision. The loss of Grade 2 agricultural soil results in a major negative environmental effect. However, there may be scope for mitigation."

6.6 In response to the major negative environmental effect of using Grade 2 agricultural land, it is clear that there is no difference with the conclusions for a number of preferred allocations. The proposed site is on the boundary of grade 2/3 agricultural land. All undeveloped and proposed allocation sites within Trimley St.Mary and Trimley St.Martin are on Grade 2 Agricultural Land. The proposed site is therefore no more important for protection as agricultural land than the allocated sites and may in fact be less desirable due to the size of the site and the overall quality. One of the objectives where the site did not score very favourably was in respect of SA Objective 8, to improve the quality of life and where people live. The SA comment here incorrectly assumed that the site will be accessed via the adjoining estate roads and as such could potentially result in a negative

impact for local residents. The reality, as set out in more detail in the delivery statement below, is that access can be provided directly on to High Road.

6.7 In respect of the site assessments and commentaries for the preferred allocations set out in the AAP, there appear to be a number of reoccurring themes which do not necessarily appear to be reflected in the sustainability appraisals. These are as follows:

Air Quality: This is clearly an issue with air quality assessments being required for the majority of the preferred allocation sites. This is an issue, particularly associated with proximity of the sites to the urban area of Felixstowe and major transport routes including the A14. In respect of the majority of the preferred allocations, and in particular the largest sites, these are more closely related to the A14 and Felixstowe than Alternative Option Site 3022a. As such, simply on the basis of the degree of separation, it can be concluded that site 3022a will perform better in respect of air quality.

Sewage Capacity: Sewage capacity is an issue raised by Anglian Water in respect of the Felixstowe sites and the site in Kirton. These sites potentially require improvement to the capacity of the foul sewer network. This does not appear to be an issue for the Trimley Villages and as set out in the delivery strategy below a preliminary foul and surface water drainage strategy has already been prepared for Alternative Option Site 3022a.

Noise: The potential impact of noise does not appear to have been given much consideration. It should be noted, that some of the preferred allocations lie adjacent to junctions on the A14. These sites or parts thereof may be susceptible to noise disturbance which may require mitigation and/or potentially reduce the developable area. Alternative Option Site 3022a, lies to the south of the A14 separated by the established allotment gardens and as such is unlikely to be adversely affected by noise from the road.

Transport Assessments: The larger preferred option allocations will require transport assessments to be carried-out. These may potentially reveal highway safety or capacity issues which could impact on the quantum of development achievable and delay delivery. This would not be necessary with the scale of development proposed on Alternative Option Site 3022a.

Heritage Assets: A number of the preferred option sites have a close relationship with existing heritage assets. In some cases the SA scored these relationships to be positive on the basis that the setting may be improved. It does not necessarily seem reasonable that a site that will have an impact on heritage assets should score more highly than one where heritage assets are unaffected as is the case with Alternative Option Site 3022a.

6.8 In conclusion it is clear from the above that Alternative Option Site 3022a has many advantages over some of the preferred allocation sites and there are no obstacles to it coming forward for development. It is in a sustainable location and could readily deliver much needed housing, including affordable housing, a significant social benefit, with very limited environmental consequences. This assessment further supports the case that it should be included as a preferred allocation.

Deliverability

6.9 Trimley St Martin lies to the west of Felixstowe, between the A14 to the north-east and the railway line to the south-west. The village of Trimley St Mary lies immediately to the south east separated by a small gap. The 2011 Census reported the population of Trimley St Mary as 3,673 and the population of Trimley St Martin as 1,932. The two villages are immediately adjacent to Felixstowe and identified in the Core Strategy as Key Service Centres due to their extensive range of facilities and proximity to Felixstowe.

6.10 Alternative Option Site 3022a, is situated on the north-western side of the village. It lies to the east of High Road, which runs parallel with the A14, connecting Felixstowe via the A1156 to Ipswich. The south-eastern side of the site abuts the residential properties of Mill Close with extensive allotment gardens lying to the north-east. The western corner of the site contains a group of existing dwellings and buildings used for commercial purposes. Beyond the site to the north-west are arable fields.

6.11 The site was in part submitted and considered under the SHLAA 2014 (site 383a) it was discounted due to concerns regarding vehicle access. Mill Close was not considered to be suitable as an accesses route and the Highway

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Authority was not in favour of direct access from High Road.

6.12 Since 2014 extensive work has been undertaken by Pigeon Investment Management Ltd to overcome the concerns relating to access and demonstrate the sites deliverability. A summary of the work to date is set out below which demonstrates the site's deliverability.

Indicative layout plan

6.13 An indicative layout plan, drawing number 015 - 015 - 00 has been prepared for the site (see Appendix). This shows how the site could be developed to deliver a range of house types including 18 affordable units. The proposed layout demonstrates that the site can deliver housing which respects the surrounding pattern of development. A strong frontage along high Road will provide a connection between the existing settlement and the group of existing buildings to the west of the site. This will be focused around the new highway access which will create an attractive and framed entrance into the development. The internal layout picks up on pedestrian connectivity through to Mill Close providing some additional frontage plots in the eastern corner of the site.

Elsewhere the proposed dwellings and street layout seeks to extend the established pattern of buildings along the site boundaries. Open space and gardens are provided along the north-eastern boundary in order to respect the presence of the allotment gardens. A large area of open space to serve the development (and the existing village) is proposed to the north which will provide a sensitive edge and integration with the open farm land beyond.

6.14 The layout demonstrates that an appropriate density of development can be provided along with a range of house types. The proposed layout can also meet garden space requirements and parking provision while respecting the amenities of adjoining residential properties.

Affordable Housing

6.15 The indicative layout shows the site could include 18 affordable units, including a variety of house types and sizes to meet local need. This will be a significant local benefit.

Heritage Assessment

6.16 The site does not lie with or adjacent to a conservation area and there are no Listed Buildings or other Heritage Assets on or nearby.

6.17 A desk-based assessment of archaeological significance was undertaken in November 2015. This report concludes that there is no evidence that proposed development will have any impact on the significance or setting of designated heritage assets of archaeological interest. It suggests that development could have an impact on the significance of undesignated heritage assets indicated by crop marks but that their significance is unlikely to be sufficient to preclude development and impact on them may be mitigated by the formulation of an appropriate archaeological strategy.

Flood Risk

6.18 The entire site is located within Flood Zone1; land assessed as having a low probability of flooding from fluvial sources. In addition, the site is not identified to be at risk from surface water or reservoir flooding, according to the Environment Agencies Flood Maps for Planning.

6.19 The development will not increase the risk of flooding post development as attenuation measures will be provided on site as part of the proposal to accommodate surface water run-off generated from the critical duration 1 in 100 year event, including an allowance for climate change.

Drainage Strategy

6.20 A preliminary drainage strategy has been prepared for the site which concludes that foul water from the development will be able to flow via gravity to the existing Anglia water sewer located in the High Road.
6.21 In respect of surface water drainage the underlying geology is expected to be of high permeability which will allow surface water run-off to discharge via infiltration. It identifies that an infiltration basin can be provided within the public open space to accommodate surface water run-off from the proposed highway. The surface water from roofs can be discharged via soakaways with permeable paving included to drain the private access roads, parking areas and driveways.

Landscape and Visual Assessment

6.22 A landscape and visual assessment of the site has been carried out and it concludes that there is capacity within the landscape to absorb change.

6.23 It suggest that given the nature, character and visual quality of the existing settlement edge and the poor quality of the existing edges of the site, it has a High Capacity to accommodate change, and the potential to enhance the settlement edge.

6.24 As such there are few constraints or issues in landscape and visual terms that would prevent the site being considered for development.

Preliminary Ecological Appraisal

6.25 A preliminary ecological appraisal has been carried out for the site. Ten habitats were identified during the Extended Phase 1 Habitat Survey including scattered broadleaved and coniferous trees, scattered scrub, poor semi-improved grassland, scattered bracken, tall ruderal, arable, introduced shrub, and species-poor intact and defunct hedgerows. In addition the field margins on-site provide opportunity for common invertebrates, reptiles, birds, and foraging / commuting bats. The report makes a series of recommendations in respect of mitigation measures and good practice during development however, no Phase 2 survey work was required. It is clear that there are no ecological barriers to the

sites development.

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Transport Report

6.26 A transport report has been prepared for the site which concludes that the proposed development can be served by an acceptable access to the highway network. The report confirms that the site is located in a sustainable location with bus stops on the boundary providing frequent services and footway connections to local facilities.

6.27 A new access can be provided onto High Road which complies with highway standards and provides adequate visibility and capacity. The existing local infrastructure can support the additional traffic generated, including through the use of more sustainable modes of transport as alternatives to the private motor car, such as cycling, walking and public transport.

6.28 The transport report confirms that access can be provided directly onto High Road and that it will not be necessary to take access via Mill Close as assumed in the assessment of the SHLAA 2014 (site 383a). This therefore overcomes the key reason for the site being discounted due to concerns regarding vehicle access.

7 CONCLUSION

7.1 As set out above and referred to elsewhere in this consultation response Alternative Option Site 3022a is available and deliverable. There are no obstacles to its development and clearly proposals are at an advanced state. The indicative layout confirms that a policy compliant scheme can be delivered which will include market and affordable housing, a large area of open space and improved connectivity.

7.2 As indicated in the landscape and visual assessment, the proposed development will be an attractive addition to the settlement, improving the quality of existing north western edges of the village.

7.3 The site is not in a flood risk area and can be suitably served by both foul and surface water drainage.

7.4 Development of the site will have no impact on designated heritage assets and any impact on undesignated assets can be mitigated. Additionally, there are no ecological barriers to the sites development.

7.5 The site is in a sustainable location with good access to local services and facilities. A new point of vehicle access, which accords with adopted standards, can be provided to High Road overcoming the original reason for the site being discounted in the SHLAA 2014 (site 383a).

7.6 Policy FPP1 of the Felixstowe Peninsular AAP is still working to the Core Strategy target of 7,900 rather than the 11,000 OE figure or an up to date objectively assessed need, as required by Core Strategy Policy SP2. In addition, the current five year supply is not based on an up to date objectively assessed need. It is therefore contended, that the Felixstowe Peninsular AAP should take the opportunity to allocate more sustainable sites that can be delivered in order to meet the requirement of the NPPF to "significantly boost its supply of housing" and assist in the maintenance of a five year supply of housing land.

These sites should allow for variety in house types and tenures to come forward to meet local needs and ensure choice and competition in the market for land (NPPF paragraph 47).

7.7 In conclusion, it is clear that Alternative Option Site 3022a has many advantages over some of the preferred allocation sites and there are no obstacles to it coming forward for development. It is in a sustainable location and could readily deliver much needed housing, including affordable housing, a significant social benefit, with very limited environmental consequences. It does not represent a risk of coalescence and is a natural and logical extension of the settlement with clear and defensible boundaries.

7.8 For the reasons set out above it is clear that Alternative Option Site 3022a should be included as a preferred allocation in the Felixstowe Peninsular AAP.

APPENDICES [see attached documents]

See Attachments to Representation Submission for following documents:

A. Location Plan

B. Indicative Layout Plan

C. Preliminary Drainage Appraisal (October 2015)

D. Desk-based Archaeological Assessment

E. Landscape and Visual Assessment (November 2015)

F. Preliminary Ecological Appraisal

G. Transport Report

H. Phase 1 Contamination Report

Summary:

Land is identified south of Thurmans Lane for residential development. (Indicative

Capacity 100 dwellings)

This site could come forward, again it is subject to air quality issues and the need to have regard to Mill Farm a Grade II Listed Building, it will also have to be accessed through the adjoining residential areas.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Appendix E - FR 3659 Figure 2 Statutory Designations(1).pdf

Appendix G - Transport Statement (November 2015).pdf

Appendix E - Landscape and Visual Assessment Summary November 2015.pdf

Appendix E - FR 3659 Figure 5 Photosheets_LR.pdf

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Appendix H - Phase 1 Contamination Report (Pt1).pdf

Appendix E - FR 3659 Figure 4 Landscape Charcter Assessment.pdf

Appendix H - Phase 1 Contamination Report (Pt2).pdf

Appendix E - FR 3659 Figure 3 Landscape and Heritage Designations and Public Rights of Way.pdf

Appendix E - FR 3659 Figure 1 Site Plan with Photo Locations(1).pdf

Appendix A - Location Plan Trimley.pdf

Appendix B - Indicative Layout Plan (015-015-002).pdf

Appendix C - Prelimiary Drainage Appriasal Nov 15 trimley.pdf

Appendix C - Prelimiary Drainage Appriasal Oct 15 trimley.pdf

Appendix F - preliminary Ecology Appraisal Trimley.PDF

Appendix D - Trimley St Martin Desk Based Archaeological Assessment.pdf

C - 7335 - 348 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7335 Comment

Housing

Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

Respondent: Trinity College Cambridge [348] Agent: Bidwells (Mr Darren Cogman) [1138]

Full Text:

I write in response to the Preferred Options consultation, submitting representations on behalf of my client, Trinity College, Cambridge, in respect of the draft allocation of Preferred Policy FPP8 - Land off Thurmans Lane, Trimley St. Marv.

Preferred Policy FPP8: Land off Thurmans Lane, Trimley St. Mary

Trinity College supports the proposed allocation of the above site for residential development.

The allocation of the site will make a meaningful contribution towards the pressing need for new housing across the Peninsula allied with the Council's commitment to deliver a minimum of 1,760 new dwellings in Felixstowe, Walton and the Trimley villages during the plan period (2010 to 2027) of the adopted Core Strategy.

The Core Strategy states that Felixstowe, Walton and the Trimley villages is by far the largest town within the District and includes the Port of Felixstowe, a strategic employment site, of both regional and national significance. Pertinently, it also acknowledges that the growth of jobs in Felixstowe, driven by expansion of

the Port, means that employment is now out of balance with the availability of housing. As a result, more of the new jobs are being taken up by people who are not able to find a home in Felixstowe, even if they would like one. This had led to an unsustainable increase in commuting from other towns on a daily basis. In

addition, the population in the area is increasing at the same time as average house-hold sizes are falling, further increasing the need for housing. The number and type of new homes provided in recent years has not matched this increase in demand.

The importance of boosting housing supply in Felixstowe is demonstrated by the Council's commitment (as required by the Inspector who examined the Core Strategy) to pursue an early review of the Core Strategy's strategic policies (amongst them a minimum housing requirement of 7,900 dwellings) by 2015 to address objectively assessed housing needs (Policy SP2 - Housing Numbers and Distribution). As part of the evidence base to inform the Core Strategy, Oxford Economics were commissioned (2010) to determine housing need for the District, which was established to be 11,000 dwellings at that time. It is understood that evidence gathering during 2015 indicates that the current full, objectively assessed district wide housing need could be higher still.

As such, current housing need is higher than the levels of growth currently being planned for, and more sites are likely to be required to come forward on the peninsular in the medium term, over and above those proposed for allocation via the AAP. It is, therefore, critical to make the best use of land for housing and prioritise the delivery of residential development.

The host site is one of a number identified by the Council as being suitable for residential development in its Strategic Housing Land Availability Assessment (Ref. 451f and 383f, SHLAA, 2014). My client supports the SHLAA's conclusion that the site is deliverable, being suitable, available and achievable for development within 5 years.

The suitability of the site for housing is reaffirmed by its sustainability. The Interim Sustainability Appraisal supporting the AAP consultation identifies that it scores well when considered against its social, environmental and economic effects. For example:

- The site is located relatively close to a range of local services, including the local shops on Faulkeners Way.
- It is adjacent to bus routes (Faulkeners Way, off Thomas Avenue) connecting the village with Felixstowe and Ipswich.
- The site will assist in the Core Strategy's aim to reduce and reverse the unsustainable patterns of incommuting to Felixstowe (the Port and its other employment areas).
- The site offers the opportunity to link to the existing Public Rights of Way Network and Village Green.

In essence, the site is ideally suited for residential development and its allocation in the AAP is entirely consistent with the Core Strategy's short to medium term objectives to deliver organic and evolutionary growth over a mixture of sites immediately abutting existing built up areas.

Scale of Residential Development Required

My client has control, as landowner, of SHLAA site 451f, which would be accessed from Thomas Avenue. Collectively, with the adjacent site (SHLAA Ref.383f) the AAP "expects" a minimum of 100 dwellings to be delivered on the site, which is broadly consistent with the SHLAA's collective estimate of between 81 and 108 dwellings for both SHLAA sites (451f and 383f). My client acknowledges this target and is bringing

forward a masterplan as part of an outline planning application for site 451f that will seek to, in part, deliver this minimum figure.

Nevertheless, it is of paramount importance to ensure the delivery of high quality living environments and, ultimately, sustainable communities. It will be necessary to take other constraints into account, such as the need to respect the setting of the Grade II Listed Mill Farmhouse adjacent the site. Such a constraint will

impinge the quantum of development that can be achieved, although we remain convinced that the minimum amount of dwellings expected across the two sites can be satisfactorily achieved.

Other Site Requirements

My client has some concern over the list of other requirements contained in draft policy FPP8 and its supporting text that proposals for the site are expected to have regard for alongside the need to deliver a minimum of 100 (across both sites) new homes. Whilst accepting the need to satisfactorily address the issue, this includes the requirement for development sympathetic to the setting of the Grade II Listed Mill Farmhouse.

Paragraph 173 of the National Planning Policy Framework (the Framework) makes clear that pursuing sustainable development requires careful attention to viability and costs in plan making and decision taking. It confirms that:

C - 7335 - 348 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7335 Comment

Housing

Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

"sites identified in the Plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions and other requirements should, when taking

account of the normal cost of development and mitigation, provide competitive returns to a willing landowner and willing developer to enable development to be deliverable."

The Council must be satisfied that the policy burdens it is seeking to impose on the site, in addition to the CIL charge that will apply, will not threaten its viability or deliverability. We have not seen any evidence to suggest that this has been fully taken into account.

Like most of Felixstowe, Walton and the Trimleys, the site is in an area assessed as being of "Low" land value in the evidence prepared to support the Council's CIL examination. This makes its viability particularly sensitive to policy burdens.

Taking this into account, there is a need to be realistic about what the site can deliver and to prioritise the most important objectives. We strongly contend that making the best use of the site to deliver housing and its supporting infrastructure should be the priority as a consequence of the Core Strategy's commitment to

deliver a minimum of 1,760 dwellings in Felixstowe before 2027, and the likelihood of an increased requirement within the same timescale arising from its forthcoming early review (understood to commence with a 'Issues and Options' consultation in October 2016). Seeking to deliver a range of other requirements

will only harm viability and, as a minimum, the amount of affordable housing that can be supported alongside CIL and other development costs.

Provision of a Range of Dwelling types will Address Issues of Housing for Older People (para. 3.68)

My client has no objection to bringing forward proposals which provide for a good mix of housing, including dwellings suitable for the elderly, but does object to any prescriptive requirement to provide bungalows or low-rise units. Whilst I note that there is no reference to bungalow or low rise development in the policy

itself, there is a specific reference to 'housing for older people' within the supporting text (para. 3.68).

It is unclear what evidence of need this requirement is based on because little justification is provided in the draft AAP. More importantly, the site does not have capacity (relatively limited site area) to support the development of land hungry bungalow dwellings when providing a minimum of 100 new dwellings across the two separately owned sites.

The requirement for low density building forms (e.g. bungalows) is not deliverable. The supporting text wording should be amended to remove any reference to housing for older people (if this implies bungalow/low rise units) and should instead focus on the delivery of a high quality residential development.

There are other measures to ensure that homes are accessible and inclusive, for example the concept of 'Lifetime Homes', that can provide sufficient flexibility and adaptability to support the changing needs of individuals and families at different stages of life. Moreover, taking account of the commitments set out in the Core Strategy, the delivery of housing suitable for all members of the community should be the priority for this site.

Requirement for an Air Quality Assessment

My client acknowledges that an Air Quality Assessment will be required to support a planning application for residential development, as we note is being required for all Preferred Option residential sites within the Trimley villages.

Conclusion

In summary, subject to the concerns outlined, my client is supportive of the proposed allocation of the site to provide new housing to assist in meeting the minimum Core Strategy housing requirements, and helping reverse unsustainable patterns of in-commuting to the Port of Felixstowe and other employment areas.

We trust that the above representations are of assistance and look forward to the Pre-Submission (soundness) consultation timetabled to commence in February 2016. In the interim, I would of course be pleased to discuss these specific representations or any other matters in respect of this site at your earliest convenience.

Summary:

The suitability of the site for housing is reaffirmed by its sustainability. The Interim Sustainability Appraisal supporting the AAP consultation identifies that it scores well when considered against its social, environmental and economic effects. The site is located relatively close to a range of local services, and is adjacent to bus routes. Subject to the concerns outlined, my client is supportive of the proposed allocation of the site to provide new housing to assist in meeting the minimum Core Strategy housing requirements, and helping reverse unsustainable patterns of incommuting to the Port of Felixstowe and other employment areas.

Change to Plan

My client has no objection to bringing forward proposals which provide for a good mix of housing, including dwellings suitable for the elderly, but does object to any prescriptive requirement to provide bungalows or low-rise units. Whilst I note that there is no reference to bungalow or low rise development in the policy itself, there is a specific reference to 'housing for older people' within the supporting text (para. 3.68).

It is unclear what evidence of need this requirement is based on because little justification is provided in the draft AAP. More importantly, the site does not have capacity (relatively limited site area) to support the development of land hungry bungalow dwellings when providing a minimum of 100 new dwellings across the two separately owned sites.

The requirement for low density building forms (e.g. bungalows) is not deliverable. The supporting text wording should be amended to remove any reference to housing for older people (if this implies bungalow/low rise units) and should instead focus on the delivery of a high quality residential development.

C - 7335 - 348 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

Soundness Tests

7335 Comment

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Legal? Sound? **Duty to Cooperate?** Appear at exam? Not Specified

Not Specified Not Specified Not Specified None

C - 7386 - 3952 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7386 Comment

Housing Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

Respondent: Anglian Water (Mr Stewart Patience) [3952] Agent: N/A

Full Text:

Thank you for the opportunity to comment on the Site Allocations and Area Policies Preferred Options Document and Felixstowe Peninsula Area Action Plan. Please find enclosed comments on behalf of Anglian Water.

Site Allocations and Area Specific Policies Preferred Options Consultation Document

Policy SSP3: Land rear of Rose Hill, Saxmundham Road Aldeburgh

Anglian Water has no objection to the proposed allocation of this site for open market housing and a care home.

Paragraph 2.28 (page 30)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.28 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP4: Land at Mill Road Badingham

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.32 (page 32)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.32 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP5: Land Adjacent to Corner Cottages, Main Road, Benhall

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP6: Land south of Brook Cottage, Benhall

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.35 (page 34)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.35 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP7: Land opposite Townsfield Cottages, Dennington

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.40 (page 37)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.40 should be amended to refer to the management of surface water run off in

C - 7386 - 3952 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7386 Comment

Housing

Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

accordance with the surface water management hierarchy.

Policy SSP8: Land south of Ambleside, Main Road, Kelsale cum Carlton

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.46

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.46 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP9: Land north of Mill Close, Orford

It is expected that there may be a need for improvements to the sewerage treatment capacity to enable the development of this site.

Policy SSP10: Land west of Garden Square Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP10:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP11: Land rear of 3 -33 Suffolk Drive, Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP11:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP12: Land north-east of Street Farm

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP12:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP13: Land fronting Old Homes Road, Thorpeness

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP13:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP14: Land south of Lower Road Westerfield.

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP15: Land at Old Station Works, Main Road Westerfield

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP15:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP16: Land at Street Farm, Witnesham (Bridge)

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP17: Land south of the primary school, Witnesham

Anglian Water has no objection to the proposed allocation of this site for residential development.

C - 7386 - 3952 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7386 Comment

Housing

Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

Policy SSP18: Ransomes, Nacton Heath

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP13:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP19: Land at Silverlace Green(former airfield) Parham

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required.

Therefore it is recommended that these issues are investigated further and Policy SSP19 is amended accordingly.

Policy SSP20: former airfield Parham

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required.

Therefore it is recommended that these issues are investigated further and Policy SSP20 is amended accordingly.

Policy SSP21: former airfield Debach

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required. Therefore it is recommended that these issues are investigated further and Policy SSP21 is amended accordingly.

Policy SSP22: Bentwaters Park, Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP22:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP23: Carlton Park, Main Road, Kelsale cum Carlton

Anglian Water has no objection to the proposed allocation of this site for employment development.

Policy SSP24: Levington Park, Levington

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP24:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP25: Riverside Industrial Estate, Border Cot Lane, Wickham Market

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP25:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP31: Snape Maltings

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site for arts, recreation and tourism related development. It is therefore suggested that the following text should be include in Policy SSP25:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Felixstowe Peninsula Area Action Plan Preferred Options Consultation document

Policy FPP3:Land at Sea Road, Felixstowe

C - 7386 - 3952 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7386 Comment

Housing

Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP4: Land north of Walton High Street, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP5: Land north of Conway Close, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is therefore suggested that the following text should be include in Policy FPP6:

'Improving the capacity of the foul sewerage network'

Policy FPP7: Land off Howlett Way, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is therefore suggested that the following text should be include in Policy FPP7:

'Improving the capacity of the foul sewerage network'

Policy FPP8: Land off Thurmans Lane, Trimley St Mary

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP8:

'Improving the capacity of the foul sewerage network'

Policy FPP9: Land at Bucklesham Road, Kirton

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Policy FPP9 refers to 'reinforcement of connections'

The term reinforcements is normally used in the context of water mains and not foul sewers when referring to improvements within the network.

It is therefore suggested that the following text should be include in Policy FPP9:

'Improving the capacity of the foul sewerage network through reinforcement of connections by making necessary improvements to ensure that capacity can be made available'

Policy FPP10: Port of Felixstowe

It is noted that it proposed to allocate land at the Port of Felixstowe for strategic employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Policy FPP11: Land at Bridge Road, Felixstowe

It is noted that it proposed to allocate land at Bridge Road for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Policy FPP12: Land at Carr Road/Langer Road, Felixstowe

It is noted that it proposed to allocate land Carr Road/Langer Road for employment uses.

C - 7386 - 3952 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7386 Comment

Housing

Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

Soundness Tests

None

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP12:

'Improving the capacity of the foul sewerage network'

Policy FPP13: Land at Haven Exchange, Felixstowe

It is noted that it proposed to allocate land at Haven Exchange for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP13:

'Improving the capacity of the foul sewerage network'

Summary: It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this

site.

Change to Plan Therefore it is suggested that the following text should be include in Policy FPP8:

'Improving the capacity of the foul sewerage network'

Appear at exam? Legal? Sound? Duty to Cooperate?

Not Specified Not Specified Not Specified Not Specified

O - 7424 - 3965 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7424 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Anna Alam [3965] Agent: N/A

Full Text:

Thank you very much for considering my comments. Unfortunately, some of my neighbours in Thomas Avenue told me this weekend that they also did not see the notice on the lamp post and will not be able to make their comments known. I know that many residents around the field have different concerns and issues. I would just like to outline the areas that concern me and my husband.

- 1) The field and the hedge alongside our house is fantastic habitat for a diverse group of wildlife. If the field were to be developed our concern is for the good size hedgehog population which uses this field and the hedge. Hedgehogs are in urgent decline and is now categorised as an 'endangered species'. What mitigation measures would be put in place for example? What measures would there be to protect these hedgehogs?
- 2) The ancient hedge alongside the field is another concern. Would this be kept in place? It has historical significance and is of huge wildlife benefit to wildlife in this area. In the last few years I have seen an increase in the Song Thrush population using this hedge. (A red data book species) They have been nesting this year in the brambles on the field. In addition summer migrants are now using this field on a regular basis. They include Blackcap, Whitethroat and Garden Warblers. In July 2013 two Turtle doves arrived in our garden. (Red data book species) The hedge has lots of mature ivy and we have so many butterflies and moths that use this as a food source, including Brimstone and Comma.
- 3) What would happen to the trees on the field? Tawny owl, nest in one of the trees on the field. There are also Buzzard and Kestrel who use the field as a food source. In addition Pipistrelle bats are seen hunting over the field at dusk in the summer.

These are just some of the concerns we have for the field. Currently a fantastic example of 'scrub' and a wildlife oasis in the middle of a modern housing estate.

I would be most grateful if you could take into consideration our comments.

Summary:

The field and the hedge alongside our house is fantastic habitat for a diverse group of wildlife. If the field were to be developed our concern is for the good size hedgehog population which uses this field and the hedge. Would this ancient hedge be kept in place? It has historical significance and is of huge benefit to wildlife in this area. What would happen to the trees and hedges on the field? Currently a fantastic example of 'scrub' and a wildlife oasis in the middle of a modern housing estate

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7425 - 3966 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7425 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: . . Stuart & Sam [3966] Agent: N/A

Full Text:

I am writing to express my concerns over the planning on the field beside the josselyns in Trimley st Mary. We are not happy with the decision to use the Josselyns as the main access due to the road not being suitable for the weight, the road is broken up at the moment let alone after 100+ lorries have gone over it. If the housing was to go ahead I propose that an alternative route is to be used. Do yourselves really think that you can put 100+ houses, flats or bungalows on this site? The site of the Josselyns isn't looked after by the council very well at all and I can tell you this and say it because I have to weed the kerbside of the path down the bottom end because it is embarrassing to have friends and family round and see foot high weeds so to plan to extend the road is pathetic especially as it's not looked after now by yourselves! Other concerns are the traffic that will be coming down a narrow road like the bin lorry they have great fun getting down because people park on road side as the don't have driveways or a driveway big enough. The high road where lorries will be coming down it can't take it school time is bad enough parking in entrances to Burwood place you can't see the round about you need to address these problems before you possibly create even bigger ones from the ones not addressed at the moment it will be dangerous. The sight is not feasible for so many if any house to go on there. The mini on the entrance is bad enough only 2 days ago the bus didn't come to a stop it trickled over the line and I had to take drastic action with my brakes because he didn't stop in time just think if that was one of the lorries and a bus it could have shut the road. The driver did apologise and said he was at fault but this happens all the time cyclists thinking it's not a problem cars being in a rush n not stopping. The list can go on but you have the thoughts of us and others around me. Photos can be supplied of cars parking in morning and evening if you wish for me to do so.

Thank you for your time, I understand it is a nightmare but please ask me for any more opinions if you need to even if you would like to meet with me and discuss what people might think before you put it in writing.

Summary:

We are not happy with the decision to use the Josselyns as the main access due to the road not being suitable for the weight, the road is broken up at the moment let alone after 100+ lorries have gone over it. If the housing was to go ahead I propose that an alternative route is to be used. Do yourselves really think that you can put 100+ houses,flats or bungalows on this site? Other concerns are the traffic that will be coming down a narrow road like the bin lorry because people park on road side.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Not Specified Not Specified Not Specified Not Specified

O - 7458 - 3987 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7458 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Andrew & Lisa Elliot [3987] Agent: N/A

Full Text: Section 3.68 Land south of Thurmans Lane, Trimley St Mary

We understand that there is a shortage of housing in the area, especially affordable and local authority housing.

Our main concern is the access to the development through The Jossleyns. We know through home deliveries & refuse

collection, that this road is not wide enough to cope with large lorries.

We would also like to point out that the road in its current condition would not be able to handle the weight of heavy

plant traffic

. We are advised that access to the adjacent building plot, known as Mill Farm would be through Thomas Avenue. Surely

it would be better to access the Land South of Thurmans Lane, through the Mill Farm plot!

Summary: Our main concern is the access to the development through The Jossleyns. We know through home deliveries & refuse

collection, that this road is not wide enough to cope with large lorries.

We would also like to point out that the road in its current condition would not be able to handle the weight of heavy

plant traffic.

We are advised that access to the adjacent building plot, known as Mill Farm would be through Thomas Avenue. Surely

it would be better to access the Land South of Thurmans Lane, through the Mill Farm plot!

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7496 - 4018 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7496 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Mrs K M Lowery [4018] Agent: N/A

Full Text: We are writing to you to object to the plans to build on the 2 fields on land south of Thurmans lane Trimley St Mary. As

residents of the Josselyns our main concern is the access route into the new estate and building site as this we believe would be through the narrow residential road of the Josselyns, this road already has enough traffic movements and parking problems and we do not believe this road or Faulkerners way and mini roundabout could cope with more traffic.

The Josselyns is a cul-de-sac and as such is narrow and already heavy with local traffic and parking.

The mini roundabout at Faulkeners Way & High Rd is extremely tight and at time heavy vehicles have to reverse to

manipulate this roundabout.

If you must build, then Thurmans is the more sensible access route. Common sense must prevail if you must build here.

Summary: Our main concern is the access route into the new estate and building site as this we believe would be through the

narrow residential road of the Josselyns, this road already has enough traffic movements and parking problems and we

do not believe this road or Faulkerners way and mini roundabout could cope with more traffic.

The Josselyns is a cul-de-sac and as such is narrow and already heavy with local traffic and parking.

The mini roundabout at Faulkeners Way & High Rd is extremely tight and at time heavy vehicles have to reverse to

manipulate this roundabout.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7538 - 4043 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7538 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Mr/Mrs BJ/CJ Eden/Sheldrake [4043] Agent: N/A

Full Text: Since my partner moved into The Josselyns in 1981 and myself in 2007 we have got accustomed to the heavy traffic in

Faulkeners in the early morning and early evening. As you turn into The Josselyns from Faulkeners Way, on the left are 3 driveways. Two are for house no 1 and bungalow at no 7. Between these is the driveway for the house no 5 + 2 garages for houses 1 and 5. On the right is a long driveway for houses and garages for number 2, 4, 6. Next to this is a driveway for number 8. All within 30-40 feet of the Faulkeners Way road. If this building land is picked, then this will be a

very, very busy junction as it's nearest to the main road roundabout.

Summary: We have got accustomed to the heavy traffic in Faulkeners in the early morning and early evening. As you turn into The

Josselyns from Faulkeners Way, on the left are 3 driveways. On the right is a long driveway for houses and garages for number 2, 4, 6. Next to this is a driveway for number 8. All within 30-40 feet of the Faulkeners Way road. If this building

land is picked, then this will be a very, very busy junction as it's nearest to the main road roundabout.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7543 - 1438 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7543 Comment

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: R F Osborne [1438] Agent: N/A

Full Text: Mushroom development not on map?

FPP6

Access to High Road will put extra pressure on dangerous stretch of road totally unsuitable.

FPP7

Howlett Way only suitable if traffic does not add to High Rd.

FPP8

Again more congestion onto High Road which is already congested.

General observation

Trimley has had it's share of building over the years our Trimley has been treated unfairly the best solution would be to use land on the left of A14 between Dock Spur and Beatrice Avenue building complete new village. Too much emphasis on building on Trinity land! Band heavy lorries using High Road when trouble occurs on A14. Not at all happy.

Summary: Mushroom development not on map?

Again more congestion onto High Road which is already congested.

Trimley has had it's share of building over the years our Trimley has been treated unfairly the best solution would be to use land on the left of A14 between Dock Spur and Beatrice Avenue building complete new village. Too much emphasis

on building on Trinity land! Band heavy lorries using High Road when trouble occurs on A14.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7544 - 4045 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7544 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: . . [4045] Agent: N/A

Full Text:

We moved into The Josselyns 15 years ago as it is a nice quiet area. Moving from the Medway Towns which is a concrete jungle, and whilst visiting has since got worse I am originally from Suffolk so I know this part very well. We enjoy the comfort of having the countryside, seaside and main towns (Ipswich) if you need it. Why do you want to spoil it?

The A14 is busy enough with local traffic and when there is an accident it all comes through the villages as I know from experience (it took me 1 1/2 hours from Morrisons which is normally 15mins drive) when it happened year before last.

We already have x amount of housing being built on the site of the old mushroom farm, which is going to cause congestion around the main Trimley roundabout.

Also there is the subject of parking around here. Heavy lorries going to and fro whilst children are walking from this close to school.

We strongly object!!!

NO MORE HOUSES

Summary:

We moved into The Josselyns 15 years ago as it is a nice quiet area. Moving from the Medway Towns which is a concrete jungle, and whilst visiting has since got worse I am originally from Suffolk so I know this part very well. We enjoy the comfort of having the countryside, seaside and main towns (Ipswich) if you need it. Why do you want to spoil it?

Also there is the subject of parking around here. Heavy lorries going to and fro whilst children are walking from this close to school.

We strongly object!!!

NO MORE HOUSES

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7547 - 4047 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7547 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Mrs E Harwood [4047] Agent: N/A

Full Text: SHLAA reference: 383f & 451f

I am making an objection against the above Area Action Plan regarding the Proposal of Building of House's off Thurmans Lane/ The Josseyns, Trimley St Mary.

- 1) At the moment the layout of roads through The Josselyns would not be able to take the traffic of heavy vehicles whilst the construction of building homes takes place. I accept ore homes are required in this area but the position of this appears not to have been thought through.
- 2) If building does take place the amount of traffic will cause problems for existing home owners and new ones. The width of roads and on street parking will also cause problems for the emergency services to attend if needed. If there are to be house's for older people that could increase problems for the elderly. The Fire Service would also have problems due to the narrow roads and street parking.
- 3) At the moment the turning from Faulkners Way into the High Road, either right or left, is impossible at rush hour time, as car driver's assume the right of way along the High Road is their right, with more traffic this will cause a back up in Faulkners Way therefore not allowing traffic to move smoothly, which happens at the moment.
- 4) Parking for Trimley St Mary School also causes problems with parents dropping of and picking up children, more vehicles from new householders, if approved, will add to the problem, which at the moment is difficult for car driver's and especially bus routes.

Summary:

The layout of roads through The Josselyns would not be able to take the traffic of heavy vehicles whilst the construction of building homes takes place. I accept more homes are required in this area but the position of this appears not to have been thought through. If building does take place the amount of traffic will cause problems for existing and new homeowners. The width of roads and on street parking will also cause problems for the emergency services to attend if needed. If there are to be house's for older people that could increase problems for the elderly.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7549 - 4049 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7549 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Mr Steve Hunt [4049] Agent: N/A

Full Text: I have looked at this development plan and would like to make the following comments.

The use of the Josselyns, Thomas Avenue and the Falkeners Way/High Road junction as access for all site traffic will cause major safety and quality of life problems for the present residents, due to the heavy increase in large vehicle numbers, noise and disruption to local traffic and pedestrians.

The present roads will not be adequate to safely deal with the increase in residential traffic once the new development is occupied, and the quiet cul-de-sac nature of present housing will be destroyed. These areas have large numbers of children and pedestrian adults, and a large increase in traffic on these relatively narrow roads, with narrow pavements, drop curbs and on-street parking, will permanently damage their guiet residential nature.

I am very concerned that the proposed development will have a seriously deleterious impact on the present residents and further concerned that this aspect of the proposed development plan does not warrant any consideration in the description of the development.

I would like to express my strong objection to this part of your Development Plan, and as an effected resident expect that these views are considered alongside the interests of the developers, investors and others who stand to profit or otherwise benefit from this life-changing disruption of our local community.

Summary: The use of the Josselyns, Thomas Avenue and the Falkeners Way/High Road junction as access for all site traffic will cause major safety and quality of life problems for the present residents, due to the heavy increase in large vehicle numbers, noise and disruption to local traffic and pedestrians.

I am very concerned that the proposed development will have a seriously deleterious impact on the present residents and further concerned that this aspect of the proposed development plan does not warrant any consideration in the

description of the development.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7552 - 4050 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7552 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Mr & Mrs G & J Harding [4050] Agent: N/A

Full Text:

Too much emphasis has been put on housing in the Trimleys and Walton without any thought to the infrastructure, i.e. small High Road and what goes under it. The High Road was made for herding cattle from Trimley to Ipswich and has not been changed in any way since. This road will not be able to cope with such high housing numbers bearing in mind that sewage has been in front gardens of properties in New Road and Addington Road. We all need water will there be enough and who are these houses being built for?

Site 451d Howlett Way

This site originally was given as app 220 houses. Now it is app 360 plus. Why?

Site 383f Thurmans Lane

This site is a massive over build. A developer by the name of Bloor Homes we are led to understand wishes to build 98 houses on a small plot of land by the side of Thurmans Lane. We have photographs to prove this which shows the narrowness of the entry and exit road which by no means will take the volume of traffic generated by possibly 2 cars per household and may be more, plus the builders traffic for 2 years plus. The only entry and exit will have to be through The Josselyns where there are already app 100 properties, this is totally unacceptable and will destroy the quality of life of the residents who have never had people or cars passing their homes and will now turn it into a main road. The houses on The Josselyns have very small gardens and a proposed development alongside their rear gardens, fence to fence, will make for an over build.

451f Thomas Avenue rear

This site is very small and was originally put down as app 26. Three months ago Trinity College presented to Trimley St Mary parish council a plan for a development of app 55 houses. This sent shock waves through everybody and they walked away saying they would submit a different plan.

This will have to be very different if at all, as this space, plus the Bloor plan will create a massive over development. The only entry and exit for this site will be Thomas Avenue, again creating large numbers of vehicles every day and again reducing the quality of life for these residents. These two sites in the end will all go on to Faulkeners Way and then to the mini roundabout on to High Road which is struggling at the moment to avoid near misses and accidents as we ourselves and have witnessed. The High Road at times is impossible to cross.

These 2 above sites 383f and 451f should not be considered. Howlett Way, site 451d is partially a brownfield site being the old poultry farm but this has been over extended and should be reduced considerably.

Summary:

Site 383f Thurmans Lane

The only entry and exit will have to be through The Josselyns where there are already app 100 properties, this is totally unacceptable and will destroy the quality of life of the residents who have never had people or cars passing their homes and will now turn it into a main road. The houses on The Josselyns have very small gardens and a proposed development alongside their rear gardens, fence to fence, will make for an over build.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7553 - 4050 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7553 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Mr & Mrs G & J Harding [4050] Agent: N/A

Full Text:

Too much emphasis has been put on housing in the Trimleys and Walton without any thought to the infrastructure, i.e. small High Road and what goes under it. The High Road was made for herding cattle from Trimley to Ipswich and has not been changed in any way since. This road will not be able to cope with such high housing numbers bearing in mind that sewage has been in front gardens of properties in New Road and Addington Road. We all need water will there be enough and who are these houses being built for?

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This will have to be very different if at all, as this space, plus the Bloor plan will create a massive over development. The only entry and exit for this site will be Thomas Avenue, again creating large numbers of vehicles every day and again reducing the quality of life for these residents. These two sites in the end will all go on to Faulkeners Way and then to the mini roundabout on to High Road which is struggling at the moment to avoid near misses and accidents as we ourselves and have witnessed. The High Road at times is impossible to cross.

These 2 above sites 383f and 451f should not be considered. Howlett Way, site 451d is partially a brownfield site being the old poultry farm but this has been over extended and should be reduced considerably.

Summary:

451f Thomas Avenue

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This will have to be very different if at all, as this space, plus the Bloor plan will create a massive over development. The only entry and exit for this site will be Thomas Avenue, again creating large numbers of vehicles every day and again reducing the quality of life for these residents.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7558 - 1526 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7558 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Mr Paul Double [1526] Agent: N/A

Full Text: I strongly object to the plans to build on the 2 fields south of Thurmans Lane which are very close to my house I have a

view from my house of both fields.

My key disapproval is the access being via The Josselyns and the congestion and disruption it will cause to residents during and after construction. The Josselyns is a very quiet residential road which already has parking problems without adding more car movements. This road is narrow and I feel it cannot cope with the proposed building of 100 homes with all the traffic including building traffic going through this narrow road, this is totally unacceptable. Also road infrastructure in whole area is not capable of supporting new development. Faulkerners way is already congested especially at peak time and at the "mini roundabout" the waiting time to get on to high road is often impossible. I'm not happy about the loss of green belt land. Where is employment coming from to support the new families who move there. Please listen to

the views of The Josselyns residents.

Summary: My key disapproval is the access being via The Josselyns and the congestion and disruption it will cause to residents

during and after construction. The Josselyns is a very quiet residential road which already has parking problems without adding more car movements. This road is narrow and I feel it cannot cope with the proposed building of 100 homes with all the traffic including building traffic going through this narrow road, this is totally unacceptable. Also road infrastructure in whole area is not capable of supporting new development. Please listen to the views of The Josselyns residents.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7559 - 4054 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7559 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Mrs Skipper [4054] Agent: N/A

Full Text: I would like to advise you I strongly object to the plans to build on the 2 fields on land south of Thurmans lane Trimley St

Mary. I live in The Josselyns and my main view is the field, and this will bring huge problems to our road, our main concern is the access route into the new estate and building site as this would be through the narrow residential road of the Josselyns, this road already has enough traffic movements and there are a lot of parking problems My parking space would join the road and I would find it difficult to access this and I do not believe this road or Faulkeners way and mini roundabout could cope with more traffic. I do not agree with the building of houses on farming fields. Please

consider the residents views on this.

Summary: I live in The Josselyns and this will bring huge problems to our road, our main concern is the access route into the new

estate and building site as this would be through the narrow residential road of the Josselyns, this road already has enough traffic movements and there are a lot of parking problems My parking space would join the road and I would find it difficult to access this. I do not believe this road or Faulkeners way and mini roundabout could cope with more traffic. I

do not agree with the building of houses on farming fields.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7560 - 4055 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7560 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: S Harding [4055] Agent: N/A

Full Text: We are writing to you to object to the plans to build on the 2 fields on land south of Thurmans lane Trimley St Mary. As

residents of The Josselyns our main concern is the access route into the new estate and building site as this we believe would be through the narrow residential road of the Josselyns, this road already has enough traffic movements and parking problems and we do not believe this road or Faulkerners way and mini roundabout could cope with more traffic.

Summary: We are writing to you to object to the plans to build on the 2 fields on land south of Thurmans lane Trimley St Mary. As

residents of The Josselyns our main concern is the access route into the new estate and building site as this we believe would be through the narrow residential road of the Josselyns, this road already has enough traffic movements and parking problems and we do not believe this road or Faulkerners way and mini roundabout could cope with more traffic.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7561 - 4056 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7561 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Jeff Wood [4056] Agent: N/A

Full Text:

We object to the plans to build on the 2 fields on land south of Thurmans lane Trimley St Mary. We are residents of The Josselyns we have many concerns.

- * Very very concerned & unhappy that the access route into the new estate and building site would be through the very narrow residential road of the Josselyns, this road already has more than enough traffic movements for the houses here already and there is not enough parking at present for the existing houses causing parking problems
- * We already have limited parking in our road and very often cannot park anywhere near our home
- * This road is far too narrow for the extra traffic
- * We do not believe this road or Faulkerners way and mini roundabout could cope with more traffic. At peak times there is congestion on Faulkerners Way.
- * Concerned about the safety nature of all the building transport coming down our narrow road
- * Worried about crime as we live in a cul de sac and we all know each other and we have no crime here
- * We are extremely concerned about the noise levels especially during building work as I work shifts and would not be able to sleep during day with the constant noise
- * We chose this house for the quiet country life
- * We do not want this building work on these fields
- * Our family lives would be disrupted by this and we would not have the same quality of life
- * Environmentally this is also wrong to build on farming fields.
- * Please consider our views this is a very quiet area.

Summary:

Very concerned & unhappy that the access route into the new estate and building site would be through the very narrow residential road of the Josselyns. We are extremely concerned about the noise levels especially during building work. We chose this house for the quiet country life.

We do not want this building work on these fields.

Our family lives would be disrupted by this and we would not have the same quality of life.

Environmentally this is also wrong to build on farming fields. Please consider our views this is a very quiet area.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7562 - 4057 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7562 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

N/A Respondent: A Ross [4057] Agent:

Full Text: We are objecting strongly to the proposed building on the 2 fields bordering The Josselyns.

> Our main concern is with the proposed access road to the new estate being through the narrow Josselyns road, we are very concerned & unhappy that the access route for the building site would be through this narrow road and concerned about the safety nature of all the building transport coming down our narrow road.

> This road is far too narrow for the extra traffic, this road already has more than enough traffic movements for the houses here already and there is not enough parking at present for the existing houses causing parking problems.

Our home overlooks the field and we would lose this view. There is a lot of wildlife in this area which we would lose.

We are very concerned about the noise levels and building dust whilst the building work is going on.

The current parking in our road is limited and very often cannot park anywhere near our home. Faulkerners way and mini roundabout and the High Road cannot cope with more traffic. At peak times there is congestion on Faulkerners Way and mini roundabout.

We chose this house for the quiet country life & enjoy walking over the fields environmentally this is also wrong to build on farming fields.

We do not want this building work on these fields. Our family lives would be disrupted by this and we would not have the same quality of life. Please consider our views this is a very quiet residential area.

Our main concern is with the proposed access road to the new estate being through the narrow Josselyns road, we are Summary: very concerned & unhappy that the access route for the building site would be through this narrow road and concerned

about the safety nature of all the building transport coming down our narrow road. The current parking in our road is limited and very often cannot park anywhere near our home. Faulkerners way and mini roundabout and the High Road

cannot cope with more traffic. At peak times there is congestion on Faulkerners Way and mini roundabout.

Change to Plan

Legal? Sound? **Duty to Cooperate? Soundness Tests** Appear at exam? None

Not Specified Not Specified Not Specified Not Specified

O - 7563 - 4058 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7563 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Mr & Mrs Shutt [4058] Agent: N/A

Full Text:

My wife and I object to the plans to build on the 2 fields on land south of Thurmans lane Trimley St Mary. We are residents of The Josselyns we have many concerns.

- * Very very concerned & unhappy that the access route into the new estate and building site would be through the very narrow residential road of the Josselyns, this road already has more than enough traffic movements for the houses here already and there is not enough parking at present for the existing houses causing parking problems
- * We have a 10 month old child and our home is very close to the road and we have great concerns about the noise levels whilst the building work is going on
- * We already have limited parking in our road and very often cannot park anywhere near our home
- * This road is far too narrow for the extra traffic
- * We do not believe this road or Faulkemers way and mini roundabout could cope with more traffic. At peak times there is congestion on Faulkerners Way.
- * Concerned about the safety nature of all the building transport coming down our narrow road
- * Worried about crime as we live in a cul de sac and we all know each other and we have no crime here
- * We are extremely concerned about the noise levels especially during building work as I work shifts and would not be able to sleep during day with the constant noise
- * We chose this house for the quiet country life
- * We do not want this building work on these fields
- * Our family lives would be disrupted by this and we would not have the same quality of life
- * Environmentally this is also wrong to build on farming fields.
- * Please consider our views this is a very guiet area.

Summary:

- * We are extremely concerned about the noise levels especially during building work as I work shifts and would not be able to sleep during day with the constant noise
- * We chose this house for the quiet country life
- * We do not want this building work on these fields
- * Our family lives would be disrupted by this and we would not have the same quality of life
- * Environmentally this is also wrong to build on farming fields.
- * Please consider our views this is a very quiet area.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot Specified

O - 7564 - 4059 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7564 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: R Noble [4059] Agent: N/A

Full Text: We strongly object to the plans to build on the 2 fields south of Thurmans Lane Trimley St Mary, which are very close to

our house.

Our main disapproval is the access being via The Josselyns and the congestion and disruption it will cause to residents during and after construction

during and after construction.

The Josselyns is a very quiet residential road which already has parking problems without adding more car movements. This road is narrow and we feel it cannot cope with the proposed building of 100 homes with all the traffic including

building traffic going through this narrow road, this is totally unacceptable.

Also the road infrastructure in whole area is not capable of supporting this new development. Faulkeners way is already congested especially at peak time and at the "mini roundabout" the waiting time to get on to high road is often

impossible.

We are also not happy about the loss of green belt land.

Please listen to the views of The Josselyns residents.

Summary: Our main disapproval is the access being via The Josselyns and the congestion and disruption it will cause to residents

during and after construction.

The Josselyns is a very quiet residential road which already has parking problems without adding more car movements. This road is narrow and we feel it cannot cope with the proposed building of 100 homes with all the traffic including building traffic going through this narrow road, this is totally unacceptable. Also the road infrastructure in whole area is

not capable of supporting this new development.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7565 - 4060 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7565 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: E Ryan [4060] Agent: N/A

Full Text: I live in The Josselyns and I strongly object to the plans to build on the 2 fields on land south of Thurmans lane Trimley

St Mary. My families lives would be very much affected by this. I am very very concern the access route into the new estate and building site as this would be through the narrow residential road of the Josselyns, this road already has enough traffic movements and there are a lot of parking problems and there is no way Faulkeners way and mini roundabout could cope with more traffic. The queues to get on to the main road already have problems at peak time.

This route is unacceptable.

Please do not build in this area.

Summary: I strongly object to the plans to build on the 2 fields on land south of Thurmans lane Trimley St Mary. I am very very

concern the access route into the new estate and building site as this would be through the narrow residential road of the Josselyns, this road already has enough traffic movements and there are a lot of parking problems and there is no way Faulkeners way and mini roundabout could cope with more traffic. The queues to get on to the main road already

have problems at peak time. This route is unacceptable.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified Non

O - 7566 - 4061 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7566 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: S M McAuley [4061] Agent: N/A

Full Text: We are writing to strongly object to the plans to build on the 2 fields on land south of Thurmans lane Trimley St Mary.

As residents of The Josselyns and this will bring huge problems to our road, our main concern is the access route into the new estate and building site as this would be through the narrow residential road of the Josselyns, this road already has enough traffic movements and there are a lot of parking problems and we do not believe this road or Faulkeners way and mini roundabout could cope with more traffic. We are very unhappy the building site access would be through

the Josselyns bring lots of unacceptable noise and mess to this residential area.

Please consider our views on this.

Summary: As residents of The Josselyns and this will bring huge problems to our road, our main concern is the access route into

the new estate and building site as this would be through the narrow residential road of the Josselyns, this road already has enough traffic movements and there are a lot of parking problems and we do not believe this road or Faulkeners way and mini roundabout could cope with more traffic. We are very unhappy the building site access would be through

the Josselyns bring lots of unacceptable noise and mess to this residential area.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7567 - 4062 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7567 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: C Sheldrake [4062] Agent: N/A

Full Text:

We are objecting very strongly to the plans to build on the 2 fields on land south of Thurmans lane Trimley St Mary. We have been residents of The Josselyns since 1982 and we have many concerns.

- * Totally unacceptable to take the route to the new estate through the very narrow residential road of the Josselyns. this road already has more than enough traffic movements for the houses here already and there is not enough parking at present for the existing houses causing parking problems
- * We already have trouble joining the Josselyns and Faulkeners way from our drive
- * It is extremely hard for visitors to find anywhere to park near our house
- * This road is far too narrow for the extra traffic especially the Building traffic
- * We do not believe this road or Faulkerners way and mini roundabout and high road could cope with more traffic. At peak times there is congestion on Faulkerners Way.
- * Very Concerned and unhappy about the safety nature of all the building transport coming down our narrow road
- * We are extremely concerned about the noise levels especially during building work as I work shifts and would not be able to sleep during day with the constant noise
- * We chose this house for the quiet country life & have lived her a long time
- * We do not want this building on these fields. Environmentally this is so wrong to build on farming fields
- * Our family lives would be disrupted by this and we would not have the same quality of life
- * Our house also borders Faulkerners Way so we would have the extra traffic on that side too
- * Please consider our views this is a very quiet area.

Summary:

- * Totally unacceptable to take the route to the new estate through the very narrow residential road of the Josselyns. this road already has more than enough traffic movements for the houses here already and there is not enough parking at present for the existing houses causing parking problems
- * We already have trouble joining the Josselyns and Faulkeners way from our drive
- * It is extremely hard for visitors to find anywhere to park near our house
- * This road is far too narrow for the extra traffic especially the Building traffic

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7568 - 4063 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7568 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: . . [4063] Agent: N/A

Full Text:

We are objecting very strongly to the plans to build on the 2 fields on land south of Thurmans lane Trimley St Mary. Totally unacceptable to take the route to the new estate through the very narrow residential road of the Josselyns, this road already has more than enough traffic movements for the houses here already and there is not enough parking at present for the existing houses causing parking problems

- * This road is far too narrow for the extra traffic especially the Building traffic
- * We do not believe this road or Faulkeners way and mini roundabout and high road could cope with more traffic. At peak times there is congestion on Faulkeners Way.
- * Very Concerned and unhappy about the safety nature of all the building transport coming down our narrow road
- * We are extremely concerned about the noise levels especially during building work as I work shifts and would not be able to sleep during day with the constant noise
- * It is extremely hard for visitors to find anywhere to park near our house
- * We do not want this building on these fields. Environmentally this is so wrong to build on farming fields
- * Please consider our views this is a very quiet area.

Summary:

We are objecting very strongly to the plans to build on the 2 fields on land south of Thurmans lane Trimley St Mary. Totally unacceptable to take the route to the new estate through the very narrow residential road of the Josselyns, this road already has more than enough traffic movements for the houses here already and there is not enough parking at present for the existing houses causing parking problems.

We do not want this building on these fields. Environmentally this is so wrong to build on farming fields Please consider our views this is a very quiet area.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

O - 7569 - 4064 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7569 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: F Hart [4064] Agent: N/A

Full Text: We own a home in The Josselyns and we strongly object to the plans to build on the 2 fields on land south of Thurmans

lane Trimley St Mary. I am not happy this farming field has plans to be built on. The wildlife in this area is also important to me. My main objection and concern is the proposed access route into the new estate and building site as this would be through the narrow residential road of the Josselyns very close to my house, we suffer parking problems already and this narrow road has enough traffic movements and there are a lot of parking problems we are very unhappy this would also be the main access for over 2 years of building lorries/heavy plant past our homes and the mess and noise this will

bring

We do not believe Faulkeners way and mini roundabout and the high road could cope with more traffic. The queues to

get on to the main road already have problems at peak time. This route is unacceptable.

Please do not build in this area.

Summary: My main objection and concern is the proposed access route into the new estate and building site as this would be

through the narrow residential road of the Josselyns very close to my house, we suffer parking problems already and this narrow road has enough traffic movements and there are a lot of parking problems we are very unhappy this would also be the main access for over 2 years of building lorries/heavy plant past our homes and the mess and noise this will

bring.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7570 - 4065 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7570 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: . . [4065] Agent: N/A

Full Text: We are very unhappy with the plans to build on the 2 fields on land south of Thurmans lane Trimley St Mary. We

strongly oppose this. We have major concerns that the access route into the new estate and building site as this we believe would be through the narrow residential road of The Josselyns, this road already has more than enough traffic movements and there are a lot of parking problems and we do not believe this road or Faulkerners way and mini

roundabout could cope with more traffic. Environmentally this is wrong to build on farming land.

Summary: We are very unhappy with the plans to build on the 2 fields on land south of Thurmans lane Trimley St Mary. We

strongly oppose this. We have major concerns that the access route into the new estate and building site as this we believe would be through the narrow residential road of The Josselyns, this road already has more than enough traffic movements and there are a lot of parking problems and we do not believe this road or Faulkerners way and mini

roundabout could cope with more traffic. Environmentally this is wrong to build on farming land.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7571 - 4066 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7571 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Jane Adams [4066] Agent: N/A

Full Text:

We are writing to advise you we object strongly to the proposed building on the 2 fields bordering The Josselyns. We have lived in The Josselyns a long time we have many concerns.

- * We do NOT agree with the access road to the new estate being through the narrow Josselyns road, we are very concerned & unhappy that the access route for the building site would be through the Josselyns,
- * this road already has more than enough traffic movements for the houses here already and there is not enough parking at present for the existing houses causing parking problems
- * Our home is very close to the road and we are very concerned about the noise levels whilst the building work is going on
- * The parking in our road is limited and very often cannot park anywhere near our home
- * Faulkerners way and mini roundabout and the High Road cannot cope with more traffic. At peak times there is congestion on Faulkerners Way and mini roundabout.
- * Very Concerned about the safety nature of all the building transport coming down our narrow road
- * This road is far too narrow for the extra traffic
- * Our house would depreciate in value
- * Worried concerned about the crime levels rising in this area
- * We are extremely concerned about the noise levels
- * We chose this house for the quiet country life & enjoy walking over the fields environmentally this is also wrong to build on farming fields.
- * We do not want this building work on these fields
- * Our family lives would be disrupted by this and we would not have the same quality of life
- * Please consider our views this is a very quiet area.

Summary:

- * We do NOT agree with the access road to the new estate being through the narrow Josselyns road, we are very concerned & unhappy that the access route for the building site would be through the Josselyns,
- * this road already has more than enough traffic movements for the houses here already and there is not enough parking at present for the existing houses causing parking problems
- * Our home is very close to the road and we are very concerned about the noise levels whilst the building work is going on

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot Specified

O - 7572 - 4067 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7572 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Robert/Laura Butlers/Yeates [4067] Agent: N/A

Full Text:

We are objecting very strongly to the plans to build on the 2 fields on land south of Thurmans lane Trimley St Mary. Totally unacceptable to take the route to the new estate through the very narrow residential road of the Josselyns, this road already has more than enough traffic movements for the houses here already and there is not enough parking at present for the existing houses causing parking problems

- * We already have trouble joining the josselyns and Faulkeners way from our drive
- * It is extremely hard for visitors to find anywhere to park near our house
- * This road is far too narrow for the extra traffic especially the Building traffic
- * We do not believe this road or Faulkeners way and mini roundabout and high road could cope with more traffic. At peak times there is congestion on Faulkeners Way.
- * Very Concerned and unhappy about the safety nature of all the building transport coming down our narrow road
- * We are extremely concerned about the noise levels especially during building work as I work shifts and would not be able to sleep during day with the constant noise
- * We chose this house for the quiet country life & have lived her a long time
- * We do not want this building on these fields. Environmentally this is so wrong to build on farming fields
- * Our family lives would be disrupted by this and we would not have the same quality of life
- * Please consider our views this is a very guiet area.

Summary:

We are objecting very strongly to the plans to build on the 2 fields on land south of Thurmans lane Trimley St Mary. Totally unacceptable to take the route to the new estate through the very narrow residential road of the Josselyns, this road already has more than enough traffic movements for the houses here already and there is not enough parking at present for the existing houses causing parking problems

We already have trouble joining the josselyns and Faulkeners way from our drive

It is extremely hard for visitors to find anywhere to park near our house

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7573 - 4068 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7573 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

N/A Respondent: Mr & Mrs L Sheppard [4068] Agent:

Full Text:

We strongly object to the plans to build on the 2 fields on land south of Thurmans lane Trimley St Mary. As long term residents of The Josselyns we have many concerns.

- * Very concerned that the access route into the new estate and building site would be through the very narrow residential road of the Josselyns, this road already has more than enough traffic movements for the houses here already and there is not enough parking at present for the existing houses causing parking problems
- * We do not believe this road or Faulkerners way and mini roundabout could cope with more traffic. At times there is conjestion on Faulkerners Way.
- * Environmentally this is also wrong to build on farming fields.
- * Our main outlook is the Josselyns field and not only would we lose this view we are concerned about the noise levels especially during building work as we work shifts and would not be able to sleep during day with the constant noise * We have a young family and chose this house for the quiet country life
- * We are very concerned about the value of our house depreciating
- * We do not want this building work on these fields

Summary:

- * Very concerned that the access route into the new estate and building site would be through the very narrow residential road of the Josselyns, this road already has more than enough traffic movements for the houses here already and there is not enough parking at present for the existing houses causing parking problems
- * We do not believe this road or Faulkerners way and mini roundabout could cope with more traffic. At times there is conjestion on Faulkerners Way.
- * Environmentally this is also wrong to build on farming fields.

Change to Plan

Appear at exam? Legal? Sound? **Duty to Cooperate? Soundness Tests** Not Specified Not Specified Not Specified Not Specified None

O - 7574 - 4069 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7574 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Nicola Kemp [4069] Agent: N/A

Full Text: We are very unhappy and object strongly to the proposed building on the 2 fields bordering The Josselyns.

I have lived in Trimley most of my life and I do not agree with the building on farming fields.

We do NOT agree with the access road to the new estate being through the narrow Josselyns road, we are very concerned & unhappy that the access route for the building site would be through the Josselyns, This road is far too narrow for the extra traffic, this road already has more than enough traffic movements for the houses here already and there is not enough parking at present for the existing houses causing parking problems. Our home overlooks the field and we would lose this view. We are very concerned about the noise levels whilst the building work is going on. The current parking in our road is limited and very often cannot park anywhere near our home. Faulkerners way and mini roundabout and the High Road cannot cope with more traffic. At peak times there is congestion on Faulkerners Way and mini roundabout. Very Concerned about the safety nature of all the building transport coming down our narrow road. We are extremely concerned about the noise levels. We chose this house for the quiet country life & enjoy walking over the fields environmentally this is also wrong to build on farming fields. We do not want this building work on these fields. Our family lives would be disrupted by this and we would not have the same quality of life. Please consider our views this is a very quiet area.

Summary:

We do NOT agree with the access road to the new estate being through the narrow Josselyns road, we are very concerned & unhappy that the access route for the building site would be through the Josselyns, This road is too narrow for the extra traffic, this road already has more than enough traffic movements for the houses here already. There is not enough parking at present for the existing houses causing parking problems. Our home overlooks the field and we would lose this view. We are very concerned about the noise levels whilst the building work is going on.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7575 - 4070 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7575 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: D S H Lander [4070] Agent: N/A

Full Text: We are objecting strongly to the proposed building on the 2 fields bordering The Josselyns in Trimley St Mary.

Our main concern is with the proposed access road to the new estate being through the narrow Josselyns road, we are very concerned & unhappy that the access route for the building site would be through this narrow road and concerned about the safety nature of all the building transport coming down our narrow road. This road is far too narrow for the extra traffic, this road already has more than enough traffic movements for the houses here already and there is not enough parking at present for the existing houses causing parking problems. The current parking in our road is limited and very often cannot park anywhere near our home.

We are very concerned about the building site entrance and transport using the Josselyns as acess and the noise levels and building dust whilst the building work is going on. Faulkeners Way, the mini roundabout and the High Road cannot cope with more traffic. At peak times there is congestion on Faulkeners Way and mini roundabout.

We do not want this building work on these fields. Our family lives would be disrupted by this and we would not have the same quality of life.

Please consider our views this is a very quiet residential area.

riease consider our views trits is a very quiet residential area

Our main concern is with the proposed access road to the new estate being through the narrow Josselyns road, we are very concerned & unhappy that the access route for the building site would be through this narrow road and concerned about the safety nature of all the building transport coming down our narrow road. This road is far too narrow for the extra traffic, this road already has more than enough traffic movements for the houses here already and there is not enough parking at present for the existing houses causing parking problems.

Change to Plan

Summary:

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7576 - 4071 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7576 Object

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Coleen/David Steggles/Gibson [4071] Agent: N/A

Full Text: We would like to advise you we strongly object to the plans to build on the 2 fields on land south of Thurmans lane

Trimley St Mary. We live in The Josselyns and this will bring huge problems to our road, our main concern is the access route into the new estate and building site as this would be through the narrow residential road of the Josselyns, this road already has enough traffic movements and there are a lot of parking problems and we do not believe this road or

Faulkeners way and mini roundabout could cope with more traffic. Please consider our views on this.

Summary: We would like to advise you we strongly object to the plans to build on the 2 fields on land south of Thurmans lane

Trimley St Mary. We live in The Josselyns and this will bring huge problems to our road, our main concern is the access route into the new estate and building site as this would be through the narrow residential road of the Josselyns, this road already has enough traffic movements and there are a lot of parking problems and we do not believe this road or

Faulkeners way and mini roundabout could cope with more traffic.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7582 - 3922 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7582 Comment

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Andrew & Lisa Elliott [3922] Agent: N/A

Full Text: We understand that there is a shortage of housing in the area, especially affordable and local authority housing.

Our main concern is the access to the development through The Josselyns. We know through home deliveries & refuse

collection, that this road is not wide enough to cope with Large Lorries.

We would like to point out that the road in its current condition would not be able to handle the weight of heavy plant

traffic.

We are advised that access to the adjacent building plot, known as mill farm would be through Thomas Avenue. Surely

it would be better to access the land South of Thurmans Lane through the mill farm plot!

Summary: Our main concern is the access to the development through The Josselyns. We know through home deliveries & refuse

collection, that this road is not wide enough to cope with Large Lorries.

We would like to point out that the road in its current condition would not be able to handle the weight of heavy plant

traffic.

We are advised that access to the adjacent building plot, known as mill farm would be through Thomas Avenue. Surely

it would be better to access the land South of Thurmans Lane through the mill farm plot!

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7586 - 3839 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7586 Comment

Housing Preferred Policy FPP8: Land off Thurmans Lane,

Trimley St Mary

Respondent: Mr Steve McCullough [3839] Agent: N/A

Full Text:

I read with interest that some proposed developments within the peninsular area action plan, have the following paragraph attached. These are:-

- * SHLAA Ref 1011c. Sunday Market Site.
- * SHIAA Ref 451g, Land north of High St Walton,
- * SHLAA Ref 502e, Land north of Conway Close and
- * SHLAA Ref 383f and 451f, Land south Of Thurmans Lane, Trimley St Mary

"Anglian Water have identified that there is limited capacity in the foul sewerage network and the connections to this network may need tobe reinforced as a result of additional dwellings in this area. The capacity of the foul sewerage network is a constraint that needs to be overcome to the satisfaction of Anglian Water"

The routing of the Anglian Water outfall crosses a significant part of the Port Of Felixstowe's infrastructure. There has been an issue I have known about for the last five years, whereby at every high tide, a significant amount of treated water emerges from two drain covers in close proximity to the Main Office of Tomline House.

Anglian Water has advised the Port, it is due to their pump not being able to overcome the pressure of the tide against the outfall. The pump is required to run 24/7 to try and meet current demand and housing level.

To accommodate any new development, this situation surely must be remedied. If Anglian Water needs to upgrade their pipework capacity, they will have to excavate in some of the most recently developed areas of the Port and at considerable disruption to its Operations. Some of the network crosses a currently undeveloped site but it is only matter of time before the Port will want to incorporate this as part of its expansion programme.

Is Anglian Water prepared to undertake and pay for this multi million pound project?

Surely Suffolk Coastal District Council will want to see that Anglian Water have improved the infrastructure first, before considering any potential housing requirements?

Summary: T

To accommodate any new development, this situation surely must be remedied. If Anglian Water needs to upgrade their pipework capacity, they will have to excavate in some of the most recently developed areas of the Port and at considerable disruption to its Operations. Some of the network crosses a currently undeveloped site but it is only matter of time before the Port will want to

incorporate this as part of its expansion programme.

Is Anglian Water prepared to undertake and pay for this multi million pound project?

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7684 - 2581 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7684 Comment

Housing

Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text:

Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

- * FPP4 Walton Field evaluation has identified an Early-Middle Bronze Age funerary landscape across the site, with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.
- * FPP6 Trimley Cropmarks on this site show that there are complex archaeological remains of pits, ditches and a coaxial field system and trackways of possible late prehistoric date (TYN 122). Archaeological remains are therefore known on the site, although they have not been fully characterised.

Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7684 - 2581 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7684 Comment

Housing

Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

Early Education

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The Government has indicated that it will legislate to double the number of hours' free childcare to 30. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

- In the Trimleys, developer contributions have already been secured to help manage the existing deficit in Early Years places and proposals are being drawn up to deliver additional places. Further development of the scale proposed (530 dwellings) will necessitate significant additional provision. Under current statutory arrangements, this would necessitate 53 additional places. When Land North of Walton High Street (400 dwellings) is included, the number of places required under current arrangements would increase to 93.

The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

- Development in the remainder of Felixstowe (150 dwellings North of Conway Close and 40 dwellings at Sea Road) can be managed by expanding existing settings.
- At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

The County Council would appreciate consideration of ways in which this policy could be more supportive of early education in retail centres, as part of a balanced policy which also protects the vitality and viability of retail centres. Policy FPP17 appears to implicitly support early education already, and discussion with the District Council may conclude that this policy is sufficient.

Primary Education

The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7684 - 2581 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7684 Comment

Housing

Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

[see table in attached document]

Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

Grange Primary School can also expand, though this school is also not well related to the proposed allocations or future directions of growth.

Paragraphs 37 and 38 of the National Planning Policy Framework reflect the need to minimise the length of journeys to school and, for major developments, primary schools should be located within walking distance of most properties.

The best long term solution would be to reserve 2.2ha land for a new 315-place primary school and early years setting in a location which is well related to housing growth. This would also enable provision to be made for future growth, with another school capable of expansion.

Options for reserving land for a new primary school include:

- Land within 'Land North of Walton High Street'
- Land within another one of the Trimley sites
- Land in another location in the Trimleys, well related to sustainable travel routes and the new housing.

Secondary and Sixth Form Education

Based on standard pupil multipliers, development of 1,135 dwellings would be expected to generate an additional 204 secondary school pupils and an additional 45 sixth formers.

Felixstowe and the Trimleys are served by Felixstowe Academy. Based on the forecast below, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from the development proposed in this Plan.

[see table in attached document]

All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

Health, Wellbeing and Social Care

A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

C - 7684 - 2581 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7684 Comment

Housing

Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

- * Ferry Road opposite site 502E
- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-

C - 7684 - 2581 - Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary - None

7684 Comment

Housing

Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

FPP8 Transport Access and Traffic Issues. 100 units. Access acceptable from The Josselyns via Faulkeners Way to High Road. No vehicular access to Thurmans Lane. Transport Assessment required. Some local concerns highlighted in possible mitigation schemes. Further detailed information provided on potential mitigation schemes.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified Not Specified None

Attachments:

Felixstowe Sites SW.pdf 2015-11-23 Felixstowe AAP_SCC Final Response.pdf Kirton Sites SW.pdf Felixstowe Sites FZ.pdf Kirton Sites FZ.pdf

O - 6691 - 3758 - 3.74 - None

6691 Object

Housing 3.74

Respondent: Helen Robertson [3758] Agent: N/A

Full Text:

Following the recent consultation meeting hosted by SCDC, to discuss the development of the above piece of land I would like to make known objections to the release of this piece of land for development.

I note on your document that you categorize the land as below:

[See attached document]

I would strongly disagree with the appraisal. The development of this piece of land will have a direct impact on the last remaining Special Landscape Area in the Village as well a number of wildlife habitats, the main concern being bats. It will also have on impact on a Grade II Lister property that is in close proximity to the site. I notice from you document that other potential areas of land in Kirton have been rejected on these grounds.

The development of this land would also fundamentally change the character of the village with the loss of open space in the village scene. The Core Strategy Policy SP2 States that the expected number of new houses for Kirton and Falkenham up to 2017 would be 35 new dwellings. Whilst I understand that this was a minimum, the development approved and underway construction by

Taylor Wimpy exceed this by 19%. Therefore the village of Kirton has already satisfied the SCDC plan

using a brown field site. Therefore I cannot see what justification SCDC may have for the development of a green field site when the existing planning approvals exceed your 2027 vision.

The document also state in point 3.77 that during village consultation for the brown field Taylor Wimpy site that these was a requirement for bungalows within the village. I was at that meeting and the discussion was about the wishes of the village for that particular site. There were points made that on that site it would be good to have some bungalows for downsizing of elderly villagers. This discussion was about what we as a village wanted to see on that particular site, however it did not follow that the village wanted a second development. These are two very different discussions and cannot be drawn into one. As a Council you may need to be aware that the village of Kirton has over 100 existing bungalows which is a ratio of 1:6 with two story dwellings and as such there is a ready availability of single story dwellings.

With regard to point 3.74 and 3.76, I would like to bring to your attention concerns about the safety of the main road in that part of the village. The proposed properties will pull directly on to an already dangerous double corner. The suggestion that a crossing would be needed also indicated that you are aware of the danger of that stretch of road. However a crossing would only add to the danger as the crossing would not be visible to motorists until they are round the corner and immediately on it.

I fully understand the need for the 2017 Felixstowe Peninsular plan for building and the requirement for new homes. I did agree with the need to develop of the brown field site, on Falkenham Road in order for Kirton to meet the needs of the SCDC Plan. During that consultation period we were advised that the development of the Taylor Wimpy site and the 40+ properties would ensure that there would be no further need for development for Kirton to the end of 2027. The further development of a green field site within the village appears to be excessive and unnecessary, and certainly at odds with the needs and wishes of the community.

Summary:

With regard to point 3.74 and 3.76, I would like to bring to your attention concerns about the safety of the main road in that part of the village. The proposed properties will pull directly on to an already dangerous double corner. The suggestion that a crossing would be needed also indicated that you are aware of the danger of that stretch of road. However a crossing would only add to the danger as the crossing would not be visible to motorists until they are round the corner and immediately on it.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

H Robertson 101115.pdf

O - 6692 - 3758 - 3.76 - None

6692 Object

Housing 3.76

Respondent: Helen Robertson [3758] Agent: N/A

Full Text:

Following the recent consultation meeting hosted by SCDC, to discuss the development of the above piece of land I would like to make known objections to the release of this piece of land for development.

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[See attached document]

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Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

H Robertson 101115.pdf

C - 7509 - 4027 - 3.76 - None

7509 Comment

Housing 3.76

Respondent: John Court [4027] Agent: N/A

Full Text: Preferred Policy FPP9 Site 451F SHLAA ref 325A Land at Bucklesham RO Kirton

Main chart data is out of date. Covered in a 'small print' inclusion of Violet Gardens (B+M) development 43 dwellings more than covers our minimum government requirements, and more individual projects will take place by 31.3.2027 being planned but not yet disclosed for 1&5 Burnt House Lane area & gardens.

being planned but not yet displaced for 100 Burnt Floude Lane area a gardent

Section 3.76

The footpath is needed anyway on the south side of Bucklesham Road as the existing footpath stops at 96 although houses go to 137. The north side has layby's with cars.

Bungalows for downsizing will be built 'up to a price' as the potential occupier will have proceeds from a large house. We need small units that downsizing from a 3 bed semi in the village can afford after retirement, without a loan.

FPP9 Site 451F

This is minimum of 15 - does not include 'affordable' proportion required under planning so actual number will be greater

which will have further ramifications on services and quality of life of the local people.

Summary: The footpath is needed anyway on the south side of Bucklesham Road as the existing footpath stops at 96 although

houses go to 137. The north side has layby's with cars.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6693 - 3758 - 3.77 - None

6693 Object

Housing 3.77

Respondent: Helen Robertson [3758] Agent: N/A

Full Text:

Following the recent consultation meeting hosted by SCDC, to discuss the development of the above piece of land I would like to make known objections to the release of this piece of land for development.

I note on your document that you categorize the land as below:

[See attached document]

I would strongly disagree with the appraisal. The development of this piece of land will have a direct impact on the last remaining Special Landscape Area in the Village as well a number of wildlife habitats, the main concern being bats. It will also have on impact on a Grade II Lister property that is in close proximity to the site. I notice from you document that other potential areas of land in Kirton have been rejected on these grounds.

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The document also state in point 3.77 that during village consultation for the brown field Taylor Wimpy site that these was a requirement for bungalows within the village. I was at that meeting and the discussion was about the wishes of the village for that particular site. There were points made that on that site it would be good to have some bungalows for downsizing of elderly villagers. This discussion was about what we as a village wanted to see on that particular site, however it did not follow that the village wanted a second development. These are two very different discussions and cannot be drawn into one. As a Council you may need to be aware that the village of Kirton has over 100 existing bungalows which is a ratio of 1:6 with two story dwellings and as such there is a ready availability of single story dwellings.

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Summary:

I was at that meeting and the discussion was about the wishes of the village for that particular site. There were points made that on that site it would be good to have some bungalows for downsizing of elderly villagers. This discussion was about what we as a village wanted to see on that particular site, however it did not follow that the village wanted a second development. These are two very different discussions and cannot be drawn into one. As a Council you may need to be aware that the village of Kirton has over 100 existing bungalows.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

H Robertson 101115.pdf

C - 7508 - 4027 - 3.77 - None

7508 Comment

Housing 3.77

N/A Respondent: John Court [4027] Agent:

Preferred Policy FPP9 Site 451F SHLAA ref 325A Land at Bucklesham RO Kirton **Full Text:**

> Main chart data is out of date. Covered in a 'small print' inclusion of Violet Gardens (B+M) development 43 dwellings more than covers our minimum government requirements, and more individual projects will take place by 31.3.2027 being planned but not yet disclosed for 1&5 Burnt House Lane area & gardens.

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houses go to 137. The north side has layby's with cars.

Bungalows for downsizing will be built 'up to a price' as the potential occupier will have proceeds from a large house. We need small units that downsizing from a 3 bed semi in the village can afford after retirement, without a loan.

Site 451F

This is minimum of 15 - does not include 'affordable' proportion required under planning so actual number will be greater

which will have further ramifications on services and quality of life of the local people.

Bungalows for downsizing will be built 'up to a price' as the potential occupier will have proceeds from a large house. Summary:

We need small units that downsizing from a 3 bed semi in the village can afford after retirement, without a loan.

Change to Plan

Appear at exam? Legal? Sound? **Duty to Cooperate? Soundness Tests**

Not Specified Not Specified Not Specified Not Specified None

O - 6593 - 3716 - 3.78 - None

6593 Object

Housing 3.78

Respondent: Mrs Catherine Mowles [3716] Agent: N/A

Full Text: Concerned for the increased use on already stretched sewage system. The sewerage system can't fully cope with raw

sewage emerging upon residential properties within the proposed building area. Anglian water comments above would

highlight these issues.

Summary: Concerned for the increased use on already stretched sewage system. The sewerage system can't fully cope with raw

sewage emerging upon residential properties within the proposed building area. Anglian water comments above would

highlight these issues.

Change to Plan Refusal for building upon this area

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6553 - 2751 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6553 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Paul Durrant [2751] Agent: N/A

Full Text:

I wish to register my strong opposition to the development of Plot 325A land adjacent to 101 Bucklesham Road (oddly listed as land to the rear of 101 - 137 Bucklesham road in your documentation?)

In the first instance may I say that SCDC knew of the housing requirements outlined in your own consultation document and to allow the Taylor Wimpey development to proceed without insisting it meets some of the criteria outlined in your own policy is disgraceful. We are informed that plot 325a is a preferred option for building bungalows as Taylor Wimpey refused to build any.

It is beggars belief that 43 new houses in the village do not meet our quota because planning was granted with little consideration to the village. I presume it is easier to impose development on a little bit of land on the edge of the village than to do battle with the money making empire that is Taylor Wimpey?

The reason I object are as follows:

Quality of life:

We chose our house because of its location being surrounded by fields and wildlife, its views, lack of light pollution and tranquillity. The impact of a housing development next door to us would be considerable and one would presume reduce the value of our property. Taking the properties opposite the site in to consideration, one must presume that the view of open countryside they currently enjoy, that you are proposing to deprive them of, will become the view of open countryside that will be used to promote sales of the new properties?!

Sewage:

The existing sewage system cannot cope as it is. When a blockage occurs our ditch fills with excrement. We have had Anglia water out on several occasions all of which I am sure they have documented. The sewage pipe from house 101-137 run across our garden, there is a manhole by our ditch and in the event of a failure there is only one place for it to emerge. Our ditch, and on one occasion our pathway outside our back door! Without re laying the whole system one presumes that any problems with sewage from any new dwellings will add to the frequency of this problem. Regardless of the efficiency of the pumping station it is mechanical and will fail at some point. In this instance with the current layout we will have the new developments waste to enjoy!

Drainage:

Surface water from the road is directed in to the ditch beside our house. When extreme downpours occur this does not cope and water floods down our drive and across our property. Presumably the ditch beside plot 325a will be filled meaning an increase in surface water.

Traffic:

The site is on a blind bend that already sees frequent near misses, in particular when the houses opposite have visitors, and cars park in the road. This will be an accident waiting to happen. The area is on the outskirts of the village away from the A14. Any building in this area will increase traffic through the village which is already struggling to cope. I would suggest that a member of SCDC planning tries driving past the primary school at drop off or pick up time!! Surely sites nearer the A12 must be preferable? We will already have at least 43 new cars from the Taylor Wimpey site let alone more from any further development.

Conservation:

This is a greenfield site. I am strongly opposed to developing such sites as our countryside is precious, especially when so many brown field sites are available. This area has many species, is hunted by barn owls and other birds of prey and the Oak in our garden is a very active bat roost. All of these will be impacted by development.

Please can you confirm that this email has been read and its points filed and taken in to consideration.

Summary:

This is a greenfield site. I am strongly opposed to developing such sites as our countryside is precious, especially when so many brown field sites are available. The existing sewage system cannot cope as it is. In extreme downpours water floods down our drive. The site is on a blind bend that already sees frequent near misses. We will already have at least 43 new cars from the Taylor Wimpey site. This area has many active species such as barn owls, other birds of prey and bats.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6557 - 3245 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6557 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

N/A Respondent: Mrs Jane Bartle [3245] Agent:

Full Text: PROPOSED HOUSING DEVELOPMENT OF LAND ADJACENT TO 101 BUCKLESHAM ROAD AND DIRECTLY

OPPOSITE 86 BUCKLESHAM ROAD

I have serious concerns regarding the development of the above land.

Further development in the area is not necessary - Taylor Wimpey have already started work on a new site for 43 dwellings. Kirton is a small village with no amenities, a school which is full and no road infrastructure to cope with any more vehicles using the narrow country roads.

This particular proposed development is not in keeping with the village. The road is dangerous as there is a sharp bend with a blind corner in both directions - an accident or fatality waiting to happen.

A footpath and street lighting would result in light intrusion for the surrounding houses.

What about the environmental damage to the area. Many bird and mammal species are present here.

Construction traffic and works will impact on our lives for a considerable amount of time.

I moved here for the beautiful views - for which I paid a premium - any development at all will ruin all aspects of this, the

peaceful surroundings and typical village life. Why does all this have to be ruined with development.

I am angry that the original proposal was for 7 dwelling (I also opposed this) but now I am informed that the new development could be as many as 18 properties. Who on earth would agreed to this? What happened to the other proposed sites and why were they all dismissed so readily. THE WHOLE SITUATION IS RIDICULOUS.

I TOTALLY OPPOSE ANY DEVELOPMENT OF THIS PARTICULAR SITE.

Summary: Totally oppose any further development in the area, Taylor Wimpey have already started work on a new site for 43 dwellings. Kirton is a small village with no amenities, a school which is full and no road infrastructure to cope with any

more vehicles using the narrow country roads.

This particular proposed development is not in keeping with the village. What about the environmental damage to the area. The road is dangerous as there is a sharp bend with a blind corner in both directions. A footpath and street lighting

would result in light intrusion for the surrounding houses.

Change to Plan

Legal? Sound? **Duty to Cooperate? Soundness Tests** Appear at exam? Not Specified Not Specified Not Specified Not Specified None

O - 6565 - 3245 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6565 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mrs Jane Bartle [3245] Agent: N/A

Full Text: PROPOSED HOUSING DEVELOPMENT OF LAND ADJACENT TO 101 BUCKLESHAM ROAD

DIRECTLY OPPOSIDE 86 BUCKLESHAM ROAD KIRTON

LETS TALK HIGHWAYS

Further to recent correspondence and enquiries concerning the above proposed development I have been advised that the Highways Department has assessed the site and roads. I have not found any reports as to the conclusion of this assessment so would therefore like to point out my assessment of the situation:

The site is on a sharp bend with a blind corner in both directions.

Access from the properties would mean vehicles having to pull into the road to see any oncoming traffic - Dangerous. The road is narrow and regularly used by farm traffic using enormous vehicles that take up the whole road - This is to be expected in this rural location.

The footpath opposite is extremely narrow - defiantly not wide enough for mobility scooters, prams and more than one person walking single file - Dangerous for people walking with children.

There is a drainage ditch skirting the whole proposed site, where will excess water drain to when this is removed. The sewers and drains cannot cope.

Street lights would not be welcome in this particular location as it is not in keeping with the rest of the village.

The 30 mph speed limit is never adhered to therefore the dangerous bends at this site would be an accident waiting to happen.

On road parking is impossible so where would the off road parking for the additional (30+) cars be housed. Most households have at least 2 vehicles.

Any problems on the A14 - which happens on a regular basis - make this route a perfect short cut with cars, vans and even large lorries speeding past this proposed site. another accident waiting to happen.

I have confirmation that this particular site was proposed many years ago and DECLINED due to the danger of the road. Since that time the number of vehicles has substantially increased, the farm vehicles have become larger and the road still has the same number of blind corners and bends. SURELY THE SAME PRINCIPLES SHOULD APPLY NOW.

LETS TALK PROCEDURES

I find it quite amazing that the first anybody heard about this proposal and subsequent consultation was when a solitary sign was placed on a lamp post. The majority of residents have not even seen it as it is not visible from the road. I only saw it because I walk my dog in the area every day. Surely, if only out of courtesy, a letter should have been posted to every resident in the surrounding area notifying them of the intentions. Or is this a crafty scheme on both the Councils - Parish and Suffolk Coastal to be able to make their decision without too many objections!!

JUST ONE MORE POINT

The original proposal for this site stated 7 properties. This figure has now been increased to 15. WHERE WILL IT END?

This is a green field site in a small village and this site should never have been considered in the first place due to previous rejections.

I TOTALLY OPPOSE THIS DEVELOPMENT AND FEEL THAT IF THE ABOVE POINTS ARE NOT TAKEN INTO CONSIDERATION THE COUNCIL ARE NOT SUPPORTING THE RESIDENTS IN MAKING KIRTON A SAFE VILLAGE TO LIVE IN.

Summary:

The road is narrow and regularly used by farm traffic that take up the whole road-This is to be expected in this rural location. The footpath opposite is extremely narrow and makes it dangerous for people walking.

There is a drainage ditch skirting the whole proposed site, where will excess water drain to when this is removed. The sewers and drains cannot cope.

Street lights would not be welcome in this particular location as it is not in keeping with the rest of the village.

Consultation has not been advertised sufficiently to local residents.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6566 - 2751 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6566 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Paul Durrant [2751] Agent: N/A

Full Text: I emailed you on the 20th of October lodging my objections to the above plot of land. I did ask for confirmation that my

points and queries had been recorded but have had no such communication.

Having just had a near miss in my truck as I arrived home (we live next to the plot) I wish to further highlight the safety

concerns of this site. Please see the attached pictures taken from both directions taken when I arrived home.

Ironically the vehicle in front of the first vehicle in picture 1 is an Anglia water van working on the drains!

We have been informed that this site is deemed preferable for bungalows for those with mobility issues. This further raises concern as it is beyond belief that anyone with mobility issues would relish the though of crossing the road in

order to access the rest of the village.

To add further comment the track entrance in front of the car in picture 1 is the farm access track that is frequently used

for large farming equipment. In harvest time several times an hour!!

Summary: Having just had a near miss in my truck as I arrived home I wish to further highlight the safety concerns of this site as

seen in the pictures attached to this objection.

We have been informed that this site is deemed preferable for bungalows for those with mobility issues. This further raises concern as it is beyond belief that anyone with mobility issues would relish the though of crossing the road in

order to access the rest of the village.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

Photos.pdf

O - 6594 - 3716 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6594 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mrs Catherine Mowles [3716] Agent: N/A

Full Text: As a resident of a property opposite the proposed development site I would like to object on the following:

The access road to the proposed development is upon a blind bend. The road system does not give suitable views for entry/exit points. Traffic flow is medium through this area with increased traffic during periods of closure/diversions from the a14 and summer periods with bikes and motor cycles. This in my opinion would increase the risk of accidents. We

have experienced close calls when trying to exit our property onto this section of road

Summary: As a resident of a property opposite the proposed development site I would like to object on the following:

The access road to the proposed development is upon a blind bend. The road system does not give suitable views for entry/exit points. Traffic flow is medium through this area with increased traffic during periods of closure/diversions from the a14 and summer periods with bikes and motor cycles. This in my opinion would increase the risk of accidents. We

have experienced close calls when trying to exit our property onto this section of road

Change to Plan No change to the road system would in my opinion be suitable for vehicles to enter exit the area safely

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6595 - 3716 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6595 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mrs Catherine Mowles [3716] Agent: N/A

Full Text: With a footpath on the southern side this would incourage crossing within this section of road upon the bends. Speeding

traffic through this area would increase risk of pedestrians crossing.

Summary: With a footpath on the southern side this would incourage crossing within this section of road upon the bends. Speeding

traffic through this area would increase risk of pedestrians crossing.

Change to Plan
Not suitable area for road crossing measures.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6596 - 3716 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6596 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mrs Catherine Mowles [3716] Agent: N/A

Full Text: Consultation indicates that the development would be for bungalows for mobility. The area does not suit as it is at the

edge of the village with no easy access to amenities, bus service, community involvement in the church bowling and village hall. The nearest shop being the farm shop is close to 1 1/2 miles from this site along a narrow footpath. Not suitable for persons with mobility issues. 15 properties could potentially add 30 plus vehicles to the area for parking

Summary: Consultation indicates that the development would be for bungalows for mobility. The area does not suit as it is at the

edge of the village with no easy access to amenities, bus service, community involvement in the church bowling and village hall. The nearest shop being the farm shop is close to 1 1/2 miles from this site along a narrow footpath. Not suitable for persons with mobility issues. 15 properties could potentially add 30 plus vehicles to the area for parking

Change to Plan Leave as greenfield site to enhance the village nature as Kirton is a village not an extension of Felixstowe

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6597 - 3716 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6597 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mrs Catherine Mowles [3716] Agent: N/A

Full Text: The request for bungalows was made when previous development for B and M site was made. Local residents when

faced with development stated that if the site went ahead then it would be good for social and mobility properties to be built. Just because this was not included to the b and m site does not mean we need them. It was a request if that site

had to go ahead

Summary: The request for bungalows was made when previous development for B and M site was made. Local residents when

faced with development stated that if the site went ahead then it would be good for social and mobility properties to be built. Just because this was not included to the b and m site does not mean we need them. It was a request if that site

had to go ahead

Change to Plan This should have been included in the building on the b and m site. It has included 42 properties of which none include

bungalows

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6598 - 3245 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6598 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mrs Jane Bartle [3245] Agent: N/A

Full Text: Ref; FELIXSTOWE PENINSULA AAP CONSULTATION

PROPOSED HOUSING DEVELOPMENT OF LAND ADJACENT TO 101 BUCKLESHAM ROAD - DIRECTLY

OPPOSITE 86 BUCKLESHAM ROAD

We moved here 7 years ago to enjoy the beautiful views, peaceful surroundings and village atmosphere and we absolutely love it.

UNTIL NÓW

Somebody, in their wisdom, has earmarked these wonderful surroundings for future development.

The following points detail our concerns and reiterate all the valid reasons that were proposed at the meeting in January as to why a development should not be considered for this area:

* Access to the development from Bucklesham Road will be on a sharp

bend with visibility impossible. Especially as the 30mph speed limit is never adhered to. It is a completely blind corner from both directions. A serious accident or fatality waiting to happen.

- * This section of road is used for all the farm vehicles with only just enough space for single file.
- * There is no space for on road parking and as most families have more than one car where are they going to park the vehicles.
- * The sewers cannot cope at present how will even more houses affect this.
- * This end of the village has open space why make it into a built up area. What about wildlife and the countryside.
- * The public footpath and agricultural access opposite make it too dangerous for an additional footpath.
- * This area is not suitable for housing especially 'community housing' as it is too far away from the school for parents to walk and will mean a substantial number of additional cars blocking the road at the school and beyond making an already ridiculous situation into a complete farce.
- * Why not build nearer the A14 where access to both Felixstowe and Ipswich is readily available.
- * ORÍGINALLY 7 PROPERTIES WERE EARMARKED FOR THIS DEVELOPMENT NOW WE ARE TOLD THAT THIS FIGURE HAS BEEN INCREASED TO 19 THIS IS TOTALLY UNACCEPTABLE AND SHOULD NEVER BE ALLOWED. On a personal note why should the property that we purchased because of the situation and wonderful views for which we paid a premium be ruined by a large development right opposite our front window.

N.B. How can Taylor Wimpey be allowed to renegade on the terms of their original planning permission to include community housing on their development. Something somewhere is not right!! They have their permission for 43 dwellings and we are the ones to suffer. Surely this is enough new homes for a small village with no facilities or do SCDC want to turn all villages into towns whatever the consequences.

WE STRONGLY OPPOSE THIS APPLICATION AND FEEL THAT THE PLANNING AUTHORITY WILL NOT HAVE DONE THEIR JOB CORRECTLY SHOULD THIS DEVELOPMENT GO AHEAD.

Summary:

Access to the development from Bucklesham Road will be on a sharp bend with visibility impossible. Especially as the 30mph speed limit is never adhered to. It is a completely blind corner from both directions.

There is no space for on road parking and as most families have more than one car where are they going to park the

The sewers cannot cope at present how will even more houses affect this.

This end of the village has open space why make it into a built up area. What about wildlife and the countryside.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6599 - 3245 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6599 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mrs Jane Bartle [3245] Agent: N/A

Full Text: Ref: FELIXSTOWE PENINSULA AAP CONSULTATION PROPOSED HOUSING DEVELOPMENT OF LAND

ADJACENT TO

101 BUCKLESHAM ROAD - DIRECTLY OPPOSITE 86 BUCKLESHAM ROAD

Firstly WHY?

I am led to believe that the number of houses being built on the Taylor Wimpey site is sufficient to meet the requirements of the government plan.

I have also been notified that they are not adhering to the original planning application acceptance given by the council on the number of 'affordable homes!!' actually being developed on the site. Surely if this is the case the planning department should confront this issue and demand the original application is applied. NOT PASS THE BUCK AND FIND ANOTHER SITE TO RUIN AND BLIGHT THE LIVES, RUIN THE SURROUNDINGS AND COMPLETELY DESTROY WHAT IS NOW VILLAGE LIFE.

This particular site was originally earmarked for 7 properties - to which we were totally opposed - now I am reliably informed that consideration is being given for up to 18 properties.

Any number of properties would destroy the beautiful views, open fields and peaceful surroundings. But 18 in this particular situation is virtually an estate. Searches have led me to believe that previously this land has been considered for development and REJECTED due to the soil quality - it is too wet and boggy - therefore it would not be suitable now unless your views on this matter have

now changed!!

I would also be interested to know why none of the other sites proposed have been considered but completely dismissed - could it be that a decision was already made - I believe this to be true.

I would just like to reiterate a number of important points already submitted to yourselves that prove that a development on this land is unacceptable.

- * Access to each property from Bucklesham Road is impossible. The site is on a bend with a blind corner from both directions.
- * The road is narrow and a footpath is not feasible.
- * Any street lights would not be in keeping with the area and totally ruin the surroundings.
- * Farm vehicles regularly use this section of road and to clog up the area with a vast number of additional cars is unacceptable.

The reason I moved to this end of the village was because it was not a built up area and truly had a village feel, why destroy this now when it is totally unnecessary. Find a site nearer the A14 which has access to the main towns instead of taking the easy option and destroying innocent peoples lives.

I moved here for the peaceful surroundings and now you are proposing not only a large development of properties but all the inconvenience, noise and disruption involved with it.

I HOPE THAT MY POINTS WILL BE NOTED AND FURTHER CONSIDERATION REGARDING THE PROPOSED DEVELOPMENT TAKEN SERIOUSLY.

I OBJECT TO ANY FUTURE DEVELOPMENT OF THE PROPOSED SITE.

Summary: I would be interested to

I would be interested to know why none of the other sites proposed have been considered but completely dismissed could it be that a decision was already made.

Access to each property from Bucklesham Road is impossible. The site is on a bend with a blind corner from both directions.

The road is narrow and a footpath is not feasible.

Any street lights would not be in keeping with the area and totally ruin the surroundings.

Farm vehicles regularly use this section of road and to clog up the area with a vast number of additional cars is unacceptable.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6600 - 3912 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6600 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mrs Julie Durrant [3912] Agent: N/A

Full Text: REF: SITE 325A LAND ADJACENT TO 101 BUCKLESHAM ROAD, KIRTON SUFFOLK PROPOSED

DEVELOPMENT OF SITE

Please find enclosed my letter duly issued to Kirton and Falkenham Parish Council (Mr J Cade) for your reference and review

Please could you advise how we may view I obtain historical Planning Applications for the above Site? We have been advised that these have previously been rejected due to the dangerous double bend this site is allocated on and to the instability of the landscape.

We have tried to retrieve the information via your portal but have been unsuccessful and it may be that the application resides from some years past. The road and geographical status of this area, however, remain applicable and should therefore be of consideration during the current application.

Some items listed within the enclosed document may also require a response from SCDC and we would be very grateful if you could, where possible, afford these some report.

Please could you also advise on when the planning application for Plot 325a was received by SCDC -we are stunned that the last weeks SCDC correspondence is the first we have heard of this proposal and cannot understand why the information has not previously been publicised by Kirton and Falkenham Parish Council. Were it not for your letter advising of the planned drop in sessions, we would still be none the wiser. We are somewhat confused by the clandestineness of this when the Parish Council made a great tumult about the proposed Sites at B&M and the other potential sites under consideration, back in January of this year.

Thank you in anticipation of your assistance.

Summary: Please could you also advise on when the planning application for Plot 325a was received by SCDC-we are stunned

that the last weeks SCDC correspondence is the first we have heard of this proposal and cannot understand why the information has not previously been publicised by Kirton and Falkenham Parish Council. Were it not for your letter advising of the drop in sessions, we would still be none the wiser. We are somewhat confused by the clandestineness of this when the Parish Council made a great tumult about the proposed Sites at B&M and the other potential sites under

consideration.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6601 - 3912 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6601 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mrs Julie Durrant [3912] Agent: N/A

Full Text: REF: PLOT 325A - LAND ADJACENT TO 101 BUCKLESHAM ROAD

I write in response to your email of 21nd October 2015 (enclosed) regarding the above proposed site and to request* clarity on other items which have since come to light

Within your email you detail that the any designated site should be that which is most likely to be of use to people with mobility issues and one ideally near a pavement We are somewhat confused therefore by the choice of the Bucklesham Road plot which offers little in form of a pavement (none on the proposed site side) and is situated on two blind bends. This road is hazardous to walk by general pedestrians and would be incredibly dangerous to anyone with mobility problems, particularly if they have the need to cross the road. There are actually three blind bends at this point - approaching the village from the Kirton Road I Newborne end is a double blind bend from our dwellings heading along the proposed development The other exits from the Village Green area.

Visibility is severely restricted in both directions, as can be seen in the photographs over [attached]. For this to be considered as the best option is completely illogical. Irrespective of the fact this is a 30mph area, many motorists completely ignore the lawful limit and readily speed through this section.

There is also a farm access track at this point which is regularly used by large agricultural vehicles from Sam often until 11pm during harvest periods. These take up much of the road and cause issues for general traffic, notwithstanding pedestrians. There are no street lights through this section therefore during Winter months this stretch of road is in darkness for many hours of the day.

The Photographs below [attached] illustrate the limited visibility this section of road possesses:

- Fig 1. Blind bend heading towards Kirton Hall/Kirton Road (Proposed development on left)
- Fig 2. Approaching bend towards Kirton Hall/Kirton Road (Proposed development on left)
- Fig 3. Approaching bend towards Kilton Hall/Kirton Road (Proposed development on left)
- Fig 4. Long view of first section of bend directly alongside proposed development heading towards village green (Proposed development on right)
- Fig 5. Approach to bend directly alongside proposed development heading towards Village Green (Proposed development on right)

Fig 6. Next section of bend heading towards Village Green (Proposed development on right)

Summary:

You detail that any designated site should be that which is most likely to be of use to people with mobility issues and one ideally near a pavement We are somewhat confused therefore by the choice of the Bucklesham Road plot which offers little in form of a pavement (none on the proposed site side) and is situated on two blind bends. This road is hazardous to walk by general pedestrians and would be incredibly dangerous to anyone with mobility problems, particularly if they have the need to cross the road.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

22102015 b_Redacted.pdf

O - 6602 - 3912 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6602 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mrs Julie Durrant [3912] Agent: N/A

Full Text: REF: PLOT 325A - LAND ADJACENT TO 101 BUCKLESHAM ROAD, KIRTON, SUFFOLK

I write with reference to the above proposed development and wish to raise our concerns on this matter.

The proposed development feeds directly onto a busy, double bended narrow country lane and we have great concerns that any further building encroachment onto this stretch of byway will at some time lead to a serious accident.

This route has a speed restriction of 30mph which is rarely adhered to and is frequently used by traffic avoiding the Al4 using this route for access to Martlesham and Woodbridge from Felixstowe. This includes many 'boy racers' who ignore any enforced speed limits and treat the road as a race track.

This route also substantially increases traffic volume whenever an accident occurs East and West bound on the A 14 towards Felixstowe or Ipswich as many drivers use the road as an avoidance strategy to gain access to Woodbridge, Martlesham, Brightwell, Bucklesham and the outskirts of Ipswich.

Visibility is severely restricted in both directions on the bends, as can be seen in the photographs [attached]. Parked vehicles accentuate perceptibility issues and the lack of street lights means this road becomes very dangerous after twilight hours. As a country village and with many footpaths and bridleways linking onto this road, there are regularly horses along this route.

There is also a farm access track exiting onto this stretch of road which is habitually used by large agricultural vehicles from Sam often until 11pm during harvest periods. These take up much of the road and cause issues for general traffic, notwithstanding pedestrians.

Our driveway exits onto this section of road and we have significant difficulties when attempting to join the road, particularly during school drop-off periods when traffic is amplified and speed limits are disregarded.

We find the prospect of increased traffic capacity, turning, parking and reversing vehicles and augmented pedestrian activity, of considerable worry and request that these issues are all considered when any deliberation of development is proposed.

We have reason to believe that a previous development proposal was rejected due to the nature of this stretch of the road. This was submitted some 30 years ago and since then traffic density and volumes have increased considerably as has the usage of the road and therefore any current application should justify serious investigation.

We also note from historical enquiries that there was previously a farm exit from Site 325a onto this stretch of road. However, the road was deemed to be too dangerous for agricultural vehicles to join along this section and a decision was made to remove the gateway to exclude access and allow this to form part of the hedge corridor. Access to the site is now made some considerable distance down the village, opposite the Village Green and via an alternative farm track.

Suffolk Coastal District Council will be holding a Drop-In session on the Wednesday 4th November 2015 at Kirton Recreation Ground Pavilion (4-8pm) to enable all residents to express their concerns and queries regarding this proposal.

It would be very much appreciated if a representative from the Highways Agency be present to enable us to convey our deepest concerns for the impact any development would have on this section of highway.

We look forward to your attendance should this be possible.

Summary:

Visibility is severely restricted in both directions on the bends, as can be seen in the photographs [attached]. Parked vehicles accentuate perceptibility issues and the lack of street lights means this road becomes very dangerous after twilight hours. As a country village and with many footpaths and bridleways linking onto this road, there are regularly horses along this route.

We find the prospect of increased traffic capacity, turning, parking and reversing vehicles and augmented pedestrian activity, of considerable worry and request that these issues are all considered when any deliberation of development is proposed.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

27102015 Redacted.pdf

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

O - 6603 - 3718 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6603 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Deborah Doggett [3718] Agent: N/A

Full Text: 1) If we need bungalows why didn't the plan insist that they build some within the new Taylor Wimpey site.

2) Sewers can't cope now. I have a smell outside my house & have been 'dealing' with Anglian Water for over 10 years.

3) We already have more than the quota of houses up to 2027.

4) The proposed houses are on a bend.

5) Assuming people in bungalows are less able more cars, bad access.

6) Sewerage overflows in Burnt House Lane already.

7) Min of 15 houses states tells us nothing. What is max no.

Summary: 1) If we need bungalows why didn't the plan insist that they build some within the new Taylor Wimpey site.

2) Sewers can't cope now. I have a smell outside my house & have been 'dealing' with Anglian Water for over 10 years.

3) We already have more than the quota of houses up to 2027.

4) The proposed houses are on a bend.

5) Assuming people in bungalows are less able more cars, bad access.

6) Sewerage overflows in Burnt House Lane already.

7) Min of 15 houses states tells us nothing. What is max no.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6604 - 3720 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6604 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mr Jack Cade [3720] Agent: N/A

Full Text: With the Taylor Wimpey site, Kirton is already delivering 30% more homes than the Local Plan requires. There should

not be any more sites allocated in Kirton. We neither have the transport or services to sustain future growth responsibly.

Summary: With the Taylor Wimpey site, Kirton is already delivering 30% more homes than the Local Plan requires. There should

not be any more sites allocated in Kirton. We neither have the transport or services to sustain future growth responsibly.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6605 - 3721 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6605 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mr Derek Jacobs [3721] Agent: N/A

Full Text: Given the current number of houses being built, there is no need for any further developments at this time. The local

residents feel that the current developments are sufficient.

Summary: Given the current number of houses being built, there is no need for any further developments at this time. The local

residents feel that the current developments are sufficient.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6606 - 3722 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6606 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

N/A Respondent: Tabetha Snape [3722] Agent:

Full Text: I am writing to express my concerns on behalf of myself & my partner Belinda Hughes about the proposed housing

development on Bucklesham Road. We live opposite to this site & feel that the proposed site entrance onto Bucklesham Road would be dangerous as the road at this point has 2 opposing bends.

Driver visibility when exiting our own property is hard enough but from the other side of the road it would be dangerously

compromised.

There is also the issue with drainage facilities. We have lived in the village for 18 months and have seen roads flooded on numerous occasions. To cope with even more housing would require a major overhaul of drainage/sewerage

capabilities surely?

We also understand that the site has been earmarked for affordable housing and bungalows for the elderly. It seems an odd choice of location given that public transport is very limited, there are no shops/post office or health centres - all the

things young families or the elderly would require??

In addition to this, the road is narrow and there is no foot path on the proposed side, traffic often passes over the 30mph

speed limit and there is a lot of farm machinery from the early hours until late at night. The idea of having more housing

at such a dangerous section of the road seems ill conceived.

Summary: The proposed site entrance onto Bucklesham Road would be dangerous as the road at this point has 2 opposing bends.

Driver visibility from this side of the road would be dangerously compromised.

There is also the issue with drainage facilities. We have seen roads flooded on numerous occasions. To cope with even

more housing would require a major overhaul of drainage/sewerage capabilities surely?

We understand the site has been earmarked for affordable housing and bungalows for the elderly. It seems an odd

choice of location given that public transport is very limited, there are no shops/post office or health centres.

Change to Plan

Appear at exam? Legal? Sound? **Duty to Cooperate? Soundness Tests** None

Not Specified Not Specified Not Specified Not Specified

O - 6614 - 3732 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6614 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Jackie Bendall [3732] Agent: N/A

Full Text: Comments re Allocation for Development in Kirton Site 325a

Traffic

- a) Exiting and entering my property at 71 Bucklesham Rd is already difficult because of the blind bend in both directions and entrance to Struston Mead opposite.
- b) The majority of traffic goes along this road in excess of the 30mph speed limit (often up to 60mph). Perhaps a survey could be done at rush hour and not at a quiet time of day. Even the very large farm traffic exceed the speed limit.
- c) Opposite the site is well used farm track, when these enormous pieces of machinery enter and exit they take up most of the road.
 - d) vehicles leaving and entering the proposed site will be doing so between two blind bends.
 - e) Bucklesham Rd is an escape route for the A14.
 - f) Traffic is only going to increase along this road.

For the above traffic reasons I object to the development of Site 325a.

2. Further objections.

- a) building on a Greenfield Site is unacceptable when Kirton has satisfied it's requirement by building 43 dwellings on the former B&M site, and so filled it's quota until 2027. I gather it's 'band' was downgraded from the original document.
- b) There is no shop or prospective employment in the village, how can it sustain further development without becoming a dormitory of Felixstowe?
- c) I know the land in question is the last remaining Special Landscape Area in the village. What a lose this would be to all the villagers who walk around this area, and this must be taken into consideration. Many birds/insects/mammals/and flora abound here. This spring I saw hares boxing on the field and two years ago a dormouse nested between my hedge and the field. This I reported to the Suffolk Wildlife Trust.

Please consider the points above before giving approval to develop the site.

Summary:

The majority of traffic goes along this road in excess of the 30mph speed limit including the very large farm traffic and vehicles leaving and entering the proposed site will be doing so between two blind bends.

Traffic is only going to increase along this road which is an escape route for the A14.

Building on a Greenfield Site which is a special landscape area with lots of wildlife is unacceptable when Kirton has satisfied it's requirement by building 43 dwellings on the former B&M site.

There is no shop or prospective employment in the village.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6620 - 3119 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6620 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mr John Jay [3119] Agent: N/A

Full Text: Reference Site 325a - Land between 71 & 101 Bucklesham Road, Kirton

I have grave concerns regarding the proposed development mentioned above.

How can the use of a grade two agricultural greenfield site with outstanding views of the Suffolk Countryside be considered when the Taylor Wimpey site increased the new housing in the village over the last 10 years to 100 additional properties.

The volume of traffic using Bucklesham Road has substantially increased and this particular site is situated on a narrow road with blind bends in both directions making access in and out of the site virtually impossible without a serious accident being caused. (The site has already been declined on previous occasions with this being one of the main reasons).

The land is unsuitable due to the high water table and unstable ground.

The impact of wildlife in this special landscape area would be affected to yet another concrete jungle.

The problems with the sewerage system backing up from Bucklesham and Kirton and flooding gardens would only be increased with any further development in the area. A major upgrade affecting the whole of the village would be necessary

I AM TOTALLY OPPOSED TO ANY DEVELOPMENT OF THIS SITE

THIS PARTICULAR SITE SHOULD BE DISCARDED AND ANY PROPOSALS NOW OR IN THE FUTURE DECLINED

IMMEDIATELY

REMEMBER KIRTON IS A VILLAGE AND SHOULD REMAIN THAT WAY

The amount of building and properties allocated is more than sufficient until 2027 as per the guidelines.

Summary: How can the use of a grade two agricultural greenfield site with outstanding views of the Suffolk Countryside be

considered when the Taylor Wimpey site increased the new housing in the village over the last 10 years to 100 additional properties.

The problems with the sewerage system backing up from Bucklesham and Kirton would only be increased with any further development. A major upgrade affecting the whole of the village would be necessary.

I AM TOTALLY OPPOSED TO ANY DEVELOPMENT OF THIS SITE.

THIS SITE SHOULD BE DISCARDED AND ANY PROPOSALS NOW OR IN THE FUTURE DECLINED IMMEDIATELY

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified Nor Specified No

O - 6641 - 3912 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6641 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mrs Julie Durrant [3912] Agent: N/A

Full Text: REF: FELIXSTOWE PENINSULA PLAN - PLOT 325A - PROPOSED DEVELOPMENT OF LAND ADJACENT TO 101

BUCKLESHAM ROAD, KIRTON

I write with reference to the above proposed development.

I am exceptionally distressed that the decision has been taken to develop this plot of land which lies adjacent to our property and that it is at this late hour that SCDC have chosen to inform us of such proposals.

I have many issues with this contentious scheme, which I will list below, but ultimately I am bitterly disappointed . that we have been misled and deceived by previous correspondence and discussion with SCDC and the Parish Council.

When we attended the proposals meeting on January 27th 2015, we were led to believe that were the housing application to be granted for the B&M Site, this would more than meet the required quota of housing required under the AAP Plan and the village would have no need for further development. It was also portrayed that this site would encompass a percentage of the required Community Housing that is compulsory under planning directive.

It is now apparent that we were hoodwinked on both occasions and that SCDC have allowed Taylor Wimpey a free hand to progress the site in whichever manor they prefer and that they are able to renegade on any preferential conditions accentuated by the Council.

The result of this complete disregard for any local opposition or objection is that we now face the prospect of considerable development and annexation to the valued area we live.

Having sourced previously issued documentation, I would be very grateful if you could clarify the following:

- 1. Why have all other sites previously under consideration now been disregarded without further local consultation and Site 325a now be the preferred option? Have we been selected as it was considered the limited residency in this area would provide the least opposition to such a scheme?
- 2. I note from the Planning Committee Meeting Minutes of Wednesday 10th June 2015 that Taylor Wimpey at that early stage made it clear they had no plans to include community housing in the B&M development and that the Head of Planning & Coastal Management suggested that bungalows could be built on 'Other sites' in Kirton why, therefore, have we only now been informed of this nearly 5 months later? Was this not considered of major importance when it is going to have such a dramatic impact on our property, environment and lives? And why did the Parish Council I SCDC not enforce this requirement be included on the B&M site?
- 3. Why have the proposed housing types not been conveyed -TW will have some concept of what their best possible option would be for this site so why as residents have we not been informed of what dwellings are proposed? Any development here will have a major impact on many households and surely we should be entitled to know what type of housing TW is considering?

In addition I would like to emphasise the following points:

- * As previously iterated, we have an inefficient sewer system which often becomes blocked releasing raw effluent into the ditch that borders our garden and that of the proposed site. We have had to call out Anglian Water on several occasions to clear the blockage and we are usually left with a foul lingering stench which will be exacerbated by the inclusion of additional houses waste.
- * We have a desperately inadequate drainage system. In heavy downpours the drains become overwhelmed with water and overflow causing a cascade of water to run down our drive and into the ditch. The water accumulation outside our property can be several inches deep and takes considerable time to disperse. Further concrete I tarmacked surfaces will dramatically restrict the ability for water to run off and the removal of the roadside ditch will eliminate another exit source.
- * Environment -This area is populated by many bird and mammal species, notably Barn Owls, Tawny Owls, Little Owls, Buzzards, Sparrowhawks, Kestrels, many 'Garden bird' species, migratory Redwings, Fieldfare & Thrushes, Badgers, Hares, Bats, Red Deer, Muntjac, Foxes and various voles and shrews. The loss of this habitat would be considerable and I have no doubt would eliminate the presence of many within this vicinity. Within our boundary we have an aged Oak tree which is the residence for a considerable bat roost -the interference from construction works, light pollution and the removal of vital hedgeways would be devastating to already delicate bat populations.

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

O - 6641 - 3912 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6641 Object

Housing

Preferred Policy FPP9: Land at Bucklesham Road, Kirton

- * Farm Traffic -we are bordered by arable fields for some considerable distance and our roads are frequented by heavy, farm traffic and vehicles. Many of these access farmland via the track opposite the proposed site. This is already a blackspot as vision is reduced due to the road bend and the exit of these slow, broad and industrious vehicles is already a hazard to pedestrians and traffic. For this to be compacted by vehicles from additional housing opposite would inevitably lead to an accident on some occasion.
- * Light I Noise Pollution We moved here for the beautiful views, the peaceful surroundings and the disembodiment from street lights, noise and bustle of everyday life. Additional housing will inevitably increase the light and noise levels in this area. We already have the light glow from Felixstowe dock which pollutes the night sky and any further encroachment will add to this.
- * Location -The proposed site is on a dangerous bend. The imposed 30mph Speed limit is rarely adhered to and additional housing on such a road-bend would intensify the risk of accidents and increase the vulnerability to walkers and pedestrians.
- * Annexation -The construction of houses on this site would be the final link between the greater inhabited section of the village and the quieter, more secluded area we live in. Many residents here chose this specific location for such a reason and do not wish to be part of the larger embodiment which would predictably lead to a noisier neighbourhood. We chose to purchase a property in a quiet village locale and further encroachment of development would de-stable this. We would anticipate the value of our property to be affected by this as would the quality of life we have*chosen.

I would be very grateful if you could acknowledge receipt of my letter and respond to the queries raised. Thank you.

Summary:

The construction of houses on this site would be the final link between the greater inhabited section of the village and the quieter, more secluded area we live in. Many residents here chose this specific location for such a reason and do not wish to be part of the larger embodiment which would predictably lead to a noisier neighbourhood. We chose to purchase a property in a quiet village locale and further encroachment of development would de-stable this. We would anticipate the value of our property to be affected by this as would our quality of life.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

O - 6645 - 3739 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6645 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mrs S Plumbly [3739] N/A Agent:

Full Text: I do not feel the need for another greenfield site to be used for housing which is not required.

Villages should remain as villages and not be turned into mini Towns with street lighting and car parking for 30+

vehicles ruining an open space for wildlife + birds.

I visit my daughter regularly who lives opposite the proposed site and I am horrified to think of the extra traffic this site

will cause.

The road is a danger with blind bends in both directions. It scares me to think how 30+ vehicles will have access to get in and out of the site. This site should never have been considered for future development with the dangers and

possibility of a serious accident of fatality.

I totally oppose this proposal.

Villages should remain as villages and not be turned into mini Towns with street lighting and car parking for 30+ Summary:

vehicles ruining an open space for wildlife + birds.

I am horrified to think of the extra traffic this site will cause.

The road is a danger with blind bends in both directions. It scares me to think how 30+ vehicles will have access to get

in and out of the site. This site should never have been considered for future development with the dangers and

possibility of a serious accident of fatality.

Change to Plan

Appear at exam? Legal? Sound? **Duty to Cooperate? Soundness Tests**

Not Specified Not Specified Not Specified Not Specified None

O - 6686 - 3245 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6686 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

N/A Respondent: Mrs Jane Bartle [3245] Agent:

PROPOSED SITE 325a - COMMENTS **Full Text:**

* WIDTH OF THE ROAD

* NO ROOM FOR FOOTPATH

* ACCESS ONTO THE ROAD WHETHER 15 SEPARATE DRIVEWAYS OR 1 ACCESS ROAD YOU WILL STILL

HAVE 30+ VEHICLES PULLING INTO THE ROAD WITH BLIND BENDS IN EITHER DIRECTION

* YOU CANNOT WIDEN JUST THE SMALL SECTION OF ROAD

* THE BENDS ALL ALONG THIS SECTION OF ROAD WILL STILL BE

PRESENT YOU CANNOT GET RID OF THEM

* THE DANGER OF A SERIOUS ACCIDENT IS MORE THAN TRIPLED

* THE LAND IS NOT ACTUALLY SUITABLE FOR ANY BUILDING

* IT IS A GREENFIELD SITE WITH WILDLIFE INCLUDING BATS AND OWLS

* ANY FORM OF STREET LIGHTING WOULD NOT BE IN KEEPING WITH THE REST OF THE VILLAGE

* THERE ARE EXTENSIVE SEWERAGE PROBLEMS IN THE VICINITY CAUSING RAW SEWERAGE TO **OVERFLOW INTO GARDENS**

* THE DRAINAGE DITCH IN FRONT OF THE PROPOSED SITE IS FOR SURFACE WATER TO DRAIN FROM THE **ROAD**

* THE DRAINS CANNOT COPE, THE ROAD WOULD FLOOD

* THERE IS CERTAINLY NOT A NEED IN THE VILLAGE FOR MORE HOUSING AND 15 PROPOSED FOR THIS SITE IS UNBELEIVABLE

IT IS THE COUNCILS RESPONSIBILITY TO ENSURE THE SAFETY OF RESIDENTS AND TO ENFORCE RESTRICTIONS ON ANY DEVELOPER (WHICH WAS NOT ADHERED TO WITH THE TAYLOR WIMPEY SITE) SITE 325a WAS DECLINED MANY YEARS AGO DUE TO THE DANGERS OF THE ROAD AND UNSUITABLE LAND - MANY YEARS ON THE ROAD IS STILL A DANGER AND THE LAND STILL UNSTABLE BUT:

* THE VOLUME OF TRAFFIC * THE NUMBER OF VEHICLES PER HOUSEHOLD

* THE SIZE OF THE AGRICULTURAL VEHICLES

* THE DISREGARD FOR 30 mph SPEED LIMIT

HAVE ALL MORE THAN TRIPLED - THEREFORE THIS PROPOSAL SHOULD BE DISREGARDED AS UNTENABLE

AND NO FURTHER ACTION TAKEN NOW OR IN THE FUTURE.

IT IS THE COUNCILS RESPONSIBILITY TO ENSURE THE SAFETY OF RESIDENTS AND TO ENFORCE Summary:

RESTRICTIONS ON ANY DEVELOPER (WHICH WAS NOT ADHERED TO WITH THE TAYLOR WIMPEY SITE) SITE 325a WAS DECLINED MANY YEARS AGO DUE TO THE DANGERS OF THE ROAD AND UNSUITABLE

LAND - MANY YEARS ON THE ROAD IS STILL A DANGER AND THE LAND STILL UNSTABLE

THIS PROPOSAL SHOULD BE DISREGARDED AS UNTENABLE AND NO FURTHER ACTION TAKEN NOW OR IN

THE FUTURE.

Change to Plan

Duty to Cooperate? Appear at exam? Legal? Sound? **Soundness Tests**

Not Specified Not Specified Not Specified Not Specified None

O - 6688 - 3912 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6688 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mrs Julie Durrant [3912] Agent: N/A

Full Text: REF: FELIXSTOWE PENINSULA PLAN - PLOT 325A - PROPOSED DEVELOPMENT OF LAND ADJACENT TO 101

BUCKLESHAM ROAD, KIRTON

ADDITIONAL COMMENTS

Further to the Consultation Evening of 4th November, I write to make further comment with regards to the above.

- 1. We noted at the Consultation meeting that the Council was unaware of the current bungalow density in the village which stands at over 100 a ratio of 1:6. Surely this should have been taken into consideration when the decision to build bungalows was initially deliberated? These numbers confirm we already have a high number of ground level dwellings relative to two-storey and therefore these are simply not a justifiable requirement.
- 2. It was highlighted that very little publication regarding the proposed development exists. We are aware of only 2No. A4 posters at the far end of the village, near the preferred site. One of these has been placed in a hedge on and unpathed road bend and is difficult and dangerous to access. This development would affect the whole of the village and therefore these posters should have been erected throughout the entire village. It was clearly apparent at the consultation that many villagers were unaware of this proposal and the widely held view was of opposition, regardless of their location in the community.
- 3. The proposed site runs adjacent to an SLA. This is the last remaining Special Landscape Area in the village. Were this to be obscured by a development it would be a travesty this view should be available to all who pass cyclists, horse-riders, ramblers, dog walkers, families, pedestrians and it should be regarded as a vital part of our unspoilt and heretical countryside. Any construction on this area would result in only those in the newly erected dwellings being able to benefit from the beauty of this locale. This should be afforded security during any development consideration.
- 4. The proposed site lies within close proximity of a Listed Building Kirton Manor. This is an 18th Century building which is of historic value to the village. As such, its curtilage should also be considered of importance and this site would obscure their view over the landscape and impact of the character of this section of the village.
- 5. We note that Anglian Water have been in the vicinity on several occasions within the last couple of weeks attending the pumping station and carrying out works in the sewers in the surrounding area. They have apportioned this to issues with the sewerage system at Bucklesham, which feeds into Kirton. The system will already to be stretched above capacity with the addition of sewage provision for the new Taylor Wimpey Site. Bucklesham is also included in the FPAAP process and will at some stage have development imposed on it and concerningly this too will be fed into the current system.

The sewage system as it stands cannot cope. Many parts of the village suffer back flow, sewage leaks and overflows. How can such an antiquated incapable structure possibly be expected to encompass even further demand?

6. Finally, please find enclosed a picture of one of the farm vehicles travelling along the road about to approach the previously mentioned double bends on Bucklesham Road. This type of machinery is regularly apparent, particularly during harvest time when the frequency of agricultural plant is predominant. There can be several large tractors and loaded trailers per hour, each taking up a considerable quantity of road width and leaving debris along the highway.

Summary:

Currently over 100 bungalows in Kirton (ration of 1:6)the need for further bungalows is unjustified.

Very little publication regarding the proposed development exists.

This is the last remaining Special Landscape Area in the village. Were this to be obscured by a development it would be a travesty.

The sewage system as it stands cannot cope. Many parts of the village suffer back flow, sewage leaks and overflows because of the antiquated incapable network. The system will already to be stretched above capacity with the addition of sewage provision for the new Taylor Wimpey Site.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Photos 13112015.pdf

O - 6690 - 3758 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6690 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Helen Robertson [3758] Agent: N/A

Full Text:

Following the recent consultation meeting hosted by SCDC, to discuss the development of the above piece of land I would like to make known objections to the release of this piece of land for development.

I note on your document that you categorize the land as below:

[See attached document]

I would strongly disagree with the appraisal. The development of this piece of land will have a direct impact on the last remaining Special Landscape Area in the Village as well a number of wildlife habitats, the main concern being bats. It will also have on impact on a Grade II Lister property that is in close proximity to the site. I notice from you document that other potential areas of land in Kirton have been rejected on these grounds.

The development of this land would also fundamentally change the character of the village with the loss of open space in the village scene. The Core Strategy Policy SP2 States that the expected number of new houses for Kirton and Falkenham up to 2017 would be 35 new dwellings. Whilst I understand that this was a minimum, the development approved and underway construction by

Taylor Wimpy exceed this by 19%. Therefore the village of Kirton has already satisfied the SCDC plan

using a brown field site. Therefore I cannot see what justification SCDC may have for the development of a green field site when the existing planning approvals exceed your 2027 vision.

The document also state in point 3.77 that during village consultation for the brown field Taylor Wimpy site that these was a requirement for bungalows within the village. I was at that meeting and the discussion was about the wishes of the village for that particular site. There were points made that on that site it would be good to have some bungalows for downsizing of elderly villagers. This discussion was about what we as a village wanted to see on that particular site, however it did not follow that the village wanted a second development. These are two very different discussions and cannot be drawn into one. As a Council you may need to be aware that the village of Kirton has over 100 existing bungalows which is a ratio of 1:6 with two story dwellings and as such there is a ready availability of single story dwellings.

With regard to point 3.74 and 3.76, I would like to bring to your attention concerns about the safety of the main road in that part of the village. The proposed properties will pull directly on to an already dangerous double corner. The suggestion that a crossing would be needed also indicated that you are aware of the danger of that stretch of road. However a crossing would only add to the danger as the crossing would not be visible to motorists until they are round the corner and immediately on it.

I fully understand the need for the 2017 Felixstowe Peninsular plan for building and the requirement for new homes. I did agree with the need to develop of the brown field site, on Falkenham Road in order for Kirton to meet the needs of the SCDC Plan. During that consultation period we were advised that the development of the Taylor Wimpy site and the 40+ properties would ensure that there would be no further need for development for Kirton to the end of 2027. The further development of a green field site within the village appears to be excessive and unnecessary, and certainly at odds with the needs and wishes of the community.

Summary:

The development of this land will have a direct impact on the last remaining Special Landscape Area in the Village as well a number of wildlife habitats, the main concern being bats. It will also have on impact on a Grade II Listed property. I notice from you document other potential areas of land in Kirton have been rejected on these grounds. Kirton has already satisfied the SCDC plan using a brown field site. I cannot see what justification SCDC have for the development of a green field site when the existing planning approvals exceed your 2027 vision.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

H Robertson 101115.pdf

O - 6751 - 3790 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6751 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mr & Mrs P Allen [3790] Agent: N/A

Full Text:

We are writing to express our concern and dismay at the proposed development on the plot of land between 71 and 101, Bucklesham Road, Kirton, reference, 325A.

We were very shocked to hear about the proposal and at such a late stage in the process. Having now had the planning notice pointed out to us, it is no surprise that the public were unaware of the proposal. Why was such an obscure - not to mention dangerous - location chosen for the notice, where observation is unlikely? In a hedge, on a blind bend, where there is no pavement! Not surprisingly, this has raised suspicions and added to concerns about the proposal.

We realise that all towns and villages are obliged to allow consent for new housing, in accordance with Government quidelines. In relation to this, though controversial in its own right, the

Taylor Wimpey development at the B&M Concrete Ltd., site, more than exceeds Kirton's housing requirement, as directed in the FPAAP. Therefore, why is any other location even being considered for further housing development in order to meet Kirton's obligation? Furthermore, a location identified as a Greenfield site, ie. "...undeveloped land...left to evolve naturally." Not only that, but also one which falls within a Special Landscape Area (SLA) - not to mention, the last remaining SLA in Kirton - the purpose of which is a "...conservation designation...to categorise sensitive landscapes...protected from development or other manmade influences." In respect of these two statements alone, we fail to understand why this location is even being considered for any kind of development. Surely this contravenes the definition and protection afforded by both of these designations? If anything, this environmentally important site is worthy of increased protection to ensure it is never developed but rather enhanced further, thus benefitting the local landscape and associated wildlife. We are so fortunate in Kirton to be surrounded by so much beautiful countryside, flora and fauna; it is appreciated and enjoyed by many residents, ourselves included. Every effort should be made to protect rather than destroy and degrade such important landscapes.

We appreciate that the current - and predicted - demands for housing are huge, but equally, the natural environment is under more pressure than ever before. My background is in conservation management, and I am acutely aware of the importance of the landscape and the pressures it is being subjected to. If a landscape or site has previously been afforded protection, either legally or as a matter of policy, it has been identified with very good reason, and should therefore retain that safeguard, rather than be destroyed by the very thing the designation is protecting against, namely development. Please can you explain why the designation and protection is now being ignored in respect of this proposed development?

The actual content of the proposal also raises concerns. Kirton is renowned for its on-going sewage problems, which are yet to be resolved. The existing system is not fit for purpose, and is continuing to degrade. Adding to an already existing problem seems ludicrous. Surely the current issues need addressing and rectifying as a priority, rather than being exasperated by further development? This is not just about the inconvenience of an inadequate sewage system, but there are also associated health, safety and infrastructure issues.

We understand that the proposed development at 325A, will comprise a number of properties for the elderly. Why is this even being considered at a location on the edge of a village, with such a distance from the valuable - though relatively few - facilities we have in Kirton? This is compounded by any kind of development even being considered where access is so dangerous, namely along a section of road with two blind bends. I frequently encounter drivers flouting the 30mph speed limit here, add to this the access to a residential development with impeded visibility, and the likelihood of accidents hardly bears contemplating.

Finally, we understand the proposed development would comprise bungalows. Such dwellings currently comprise a sixth of housing in Kirton, so why are more needed at the sacrifice of a protected piece of land?

We sincerely hope you will listen to the concerns of the residents and all who are opposed to this scheme, and reconsider your proposal. Please realise not just what would be lost as a result, but also the impact on the local environment and the implications on the local infrastructure, services and safety.

Summary:

We fail to understand why this location is even being considered for any kind of development. Surely this contravenes the definition and protection afforded by environmental designations? If anything, this environmentally important site is worthy of increased protection to ensure it is never developed but rather enhanced further, thus benefitting the local landscape and associated wildlife. We are so fortunate in Kirton to be surrounded by so much beautiful countryside, flora and fauna; it is appreciated and enjoyed by many residents, ourselves included. Every effort should be made to protect rather than destroy and degrade such important landscapes.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

O - 6806 - 3808 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6806 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Irene Price [3808] Agent: N/A

Full Text:

I have lived in the village since 1981 and would like to object to this proposed development. There have been many developments since I have lived here but I have never put in an objection before, I realise people need somewhere to live and that people have a right to sell their land, though I do not agree with the number of houses being built in the centre of Kirton and have expressed my opinion at the meetings that were called in Kirton.

I object to site 325a on the grounds that one side of the entire main road going through Kirton has been built up, bit by bit, over the years. The other side has been left largely clear, with views over fields and this is what makes it look and feel like a village. Building on the other side will completely take away the characteristic of the village, we might as well all up sticks and go and live on an estate somewhere.

I also object on the grounds that the nature of the road, the bends and the width, does not lend itself to more dwellings/cars. Vision is not good and the road is already bunged up with cars on occasion and I feel there will be accidents simply because the traffic (whatever the speed limit) comes through the village too quickly and putting houses/cars/people/access on that side of the road, particularly in that spot, will be dangerous.

There is also the point that the view in that particular spot is beautiful, probably the most beautiful view in the village, and to lose that takes away a lot of the charm and attraction of the village.

I strongly object to this proposal.

Summary:

I object to site 325a on the grounds that one side of the main road going through Kirton has been built up over the years. The other side has been left largely clear, with views over fields; this is what makes it look and feel like a village. Building on this side will completely take away the characteristic of the village, we might as well all up sticks and go and live on an estate somewhere.

I also object on the grounds that the nature of the road, the bends and the width, does not lend itself to more dwellings/cars.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6824 - 3813 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6824 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Sheila Fothergill [3813] Agent: N/A

Full Text:

As a resident of Kirton I wish to register my objections to the proposed development at Bucklesham Road. I will outline below several reasons for my opposition to this development.

- 1. I understand that the village has a commitment to the government to provide 42 dwellings in Kirton by 2027. (ref: Felixstowe Peninsula Area Action Plan October 2015) The planned development by Taylor Wimpey in the centre of the village is going to provide these homes and will I believe exceed the number required by legislation. Therefore why is there a need to build more residences on Bucklesham Road?
- 2. This section of Bucklesham Road is particularly narrow and has bends at either extremity of the proposed site. Current residents have the facility to turn their vehicles on their own properties but nevertheless pull out, forwards, often into the centre of the road with extreme caution before they can see clearly if it is safe to proceed. Furthermore this road is used daily by enormous agricultural vehicles as well as buses and cars and though the speed limit is 30 mph I believe it is often exceeded.
- 3. The land cited for development is a greenfield site, grade 2 agricultural land and an SLA. On the Suffolk Landscape Assessment website home page there is a photograph of a typical Suffolk landscape; the type of landscape that should be preserved for future generations and enjoyed now by all who pass by. This proposed site is just one such landscape. A haven for wildlife and an open space to be valued. An area to be appreciated as adding value to the nature of the village and which would diminish the village if it was taken for development.

I have only recently moved into the village and was very disappointed to hear about this proposed development. Being fairly recently retired my husband and I had carefully chosen this village for its position on the Felixstowe peninsula, its proximity to the sea and the pastoral aspects that are viewed as you walk through the village. There is no shop or post office, surgery or garage only a farm shop and small school at Trimley. There is no infra structure to support growth in the population of the village and if there was Kirton would not be the quiet typical Suffolk village that it is. Please reject the proposed development and ensure the village of Kirton retains its personality and charm.

Summary:

This section of Bucklesham Road is particularly narrow and has bends at either extremity of the proposed site. Residents have the facility to turn their vehicles on their own properties but nevertheless pull out, forwards, often into the centre of the road with extreme caution before they can see clearly if it is safe to proceed. Furthermore this road is used daily by enormous agricultural vehicles as well as buses and cars. Although the speed limit is 30 mph it is often exceeded. The land cited for development is a greenfield site, grade 2 agricultural land and an SLA.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6849 - 253 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6849 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mrs Susan Harvey [253] Agent: N/A

Full Text: I wish to make my objections re site 325a Bucklesham Road, Kirton.

Environmental / Wildlife Impact

As stated in the FPAAP 'this site is relatively remote from key services and development would result in the loss of Grade 2 agricultural soil in a Special Landscape Area. It scores poorly in terms of environmental effects. It is unlikely that the major negative environmental effects could be mitigated'.

This is the last remaining SLA in the village. Several years ago the physical limits boundary was intentionally drawn along the roadside at this point to leave the rural view as just that.

The wildlife on this site has been undisturbed for years and it is a wildlife haven. Bats and Owls have been recorded by wildlife enthusiasts who live near the site. This is presently a site with minimum light pollution and should remain so. Loss of this open rural space is not acceptable. Ribbon development is not appropriate here.

Effect on Grade II listed Building.

Opposite this site there is a Grade II listed building and on the same side as the site there is a cluster of old cottages. These all sit comfortably within the rural landscape. Modern buildings opposite the Listed Building would detract from them.

Drainage.

This is a very damp site with a history of drainage problems and sewage leakage into the ditch to the west of the site. The present sewage system can not cope, it has recently been regularly pumped opposite the site and further down the line in Bucklesham village it has been constantly pumped and taken away every day for 2 weeks in October 2015.

Sustainability.

This site is remote from the centre of the village where there are various hall where social events are held. On page 38 of the FPAAP it suggests a footpath should be created. This would be impossible as there would be nothing for it to link up with on the south side of the road. The road is narrow in parts and with the huge agricultural vehicles regularly using this road this would make the road even more narrow.

Facts.

The approved and started Taylor Wimpey development will deliver enough housing for the village to take it through to 2027 and beyond and that development is in the centre of the village.

There is no need for any bungalows. I have undertaken a count of bungalows which have not been extended into their roofs and there are over 100. This makes up about one fifth of the housing stock in the village. Therefore for people wishing to downsize there are bungalows available. There are at least 3 bungalows in Kirton for sale today 24/11/2915.

Therefore there is no need to give up green space in the village for the delivery of further bungalows. I hope that this site will be removed from the FPAAP

Summary:

This is the last remaining SLA in the village. Several years ago the physical limits boundary was intentionally drawn along the roadside at this point to leave the rural view as just that.

The wildlife on this site has been undisturbed for years and it is a wildlife haven. Bats and Owls have been recorded by wildlife enthusiasts who live near the site. This is presently a site with minimum light pollution and should remain so. Loss of this open rural space is not acceptable. Ribbon development is not appropriate here and the site should be removed from the AAP.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6903 - 3848 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6903 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mr Roy Abbott [3848] Agent: N/A

Full Text: This proposed development is a step too far for Kirton. We are a village and would like to remain so.

We have had several new homes built over recent years at Struston Mead, Durilda Green, The Maltings, Rivett Close

and Taylor Wimpey are in the process of building over 40 more at the B+M site.

We have surely met and exceeded our quota.

This proposal which is also on a greenfield site, I understand is for needed bungalows. But the village already has an adequate number of bungalows so these are not required.

If they are, then Taylor Wimpey should surely have been made to comply with original planning permission and include

them at B & M site.

Summary: We have had several new homes built over recent years at Struston Mead, Durilda Green, The Maltings, Rivett Close

and Taylor Wimpey are in the process of building over 40 more at the B+M site.

We have surely met and exceeded our quota.

This proposal which is also on a greenfield site, I understand is for needed bungalows. But the village already has an adequate number of bungalows so these are not required.

If they are, then Taylor Wimpey should surely have been made to comply with original planning permission and include

them at B & M site.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6913 - 3716 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6913 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mrs Catherine Mowles [3716] Agent: N/A

Full Text: I feel that the bend in the road from two blind corners is my main objection on this very busy road. As I live opposite the

proposed plot I am well aware of how dangerous it is trying to access and egress from my driveway. Also I am aware that this proposal has been rejected in the past due to this very reason, and that was 20-30years ago and the traffic has only got worse since then. I am also disappointed that we will be losing a special landscape area which is currently available to the whole of the village but if this goes ahead it will be lost to all. There is also the fact that the Manor House is a listed building and that includes the view across the fields of this building. The intention is for these properties to be for residence with mobility issues, even if you construct a new pavement on the west side of the road at some point the residence will have to cross the road to get to the centre of the village and they will have to cross on the bend adjacent to number 72 or in the other direction outside house number 101 which is also on a bend. I would also like to point out this site is approximately 1/2 a mile from the amenities which again is no good for residence with mobility issues and no transport. I would also like to point out the lack of a regular bus service and by building these houses it will not

encourage the bus companies to start running a new bus route as the residence going into these properties will

predominantly elderly and they will have bus passes so more customers with a free bus pass.

Summary: On 2 blind bends

Lose of a special landscape area to the whole village. Bad access and crossing points for pedestrians.

Distance from amenities in the village. Lose of view of a listed building

Change to Plan I can not see any changes to the proposal that would make this site suitable.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6951 - 3863 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6951 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mr John Westall [3863] Agent: N/A

Full Text: Re further development in the village of Kirton. We are about to have 40 homes built by Taylor Wimpley on a relatively

small site in the centre of the village. This is surely more than enough to call it a day for further development. We have

no amenities here ie shops schools, adequate roads - etc.

Each new house equals at least one car - much more traffic in an already overcrowded road network. It does not fulfill the need for affordable rented property for an awful lot of people - just more expensive retirement/executive houses.

Please call it a day for further expansion. This is enough.

Summary: Re further development in the village of Kirton. We are about to have 40 homes built by Taylor Wimpley on a relatively

Not Specified

small site in the centre of the village. This is surely more than enough to call it a day for further development. We have

no amenities here; shops, schools, adequate roads-etc.

Each new house equals at least one car-much more traffic in an already overcrowded road network. It does not fulfill the need for affordable rented property for an awful lot of people-just more expensive retirement/executive houses. Please

None

call it a day for further expansion. This is enough.

Not Specified

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified

Not Specified

Attachments:

O - 6973 - 2564 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6973 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Kirton and Falkenham Parish Council (Mr Colin Agent: N/A

Shaw) [2564]

Full Text: Parish Council response to the SCDC FPAAP Preferred Options document public consultation

24th November 2015

1. Housing

A. Village capacity

Page 19. Preferred Policy FPP1 Housing. Kirton and Falkenham.

This table is confusing; it states the indicative requirement for 1/4/2015 to 31/3/2027, but does not take into account the actual approved figures; namely the 43 houses of the Taylor Wimpey development. The note of paragraph 3.10 does address this, but is easily missed if the table is read in isolation, as it will be. There should be a reference in the table to paragraph 3.10 and this paragraph should be quantitative rather than stating that the table gives minimum figures; namely that the approved applications 1/4/2015 to 31/3/2027 gives a total 50 for Kirton, which is 19% more than the Total Planned.

B. Site 325a

Page 37. Land at Bucklesham Road, Kirton, 325a. Also table on Page 99.

This site should be removed from this list of preferred options for the following reasons:

- a) Without this site, Kirton is already providing 50 houses, 8 more than the FPAAP requires, which is 19% above the 'minimum' figure. Therefore this site is not necessary.
- b) SCDC's sustainability analysis is overall negative for Social Effects, overall negative for Environmental Effects and slightly positive for Economic Effects. This gives an aggregate of negative sustainability, whilst every other preferred options site is assessed as positive sustainability. We note that SCDC does state that 325a scores poorly for environmental effects and that it is unlikely that these can be mitigated. Site 325a is the only unsustainable site in the list of preferred options and so should be removed. The Parish Council's previous recommendations for sustainability scores (attached at the back) [see attached document] have not been incorporated; these would give an even more negative score.
- c) Residents have raised valid concerns about the access visibility to the road and also the danger and frequent jams due to large agricultural vehicles and buses negotiating the narrow road with tight bends, unable to pass each other. Before this site is further considered SCDC should ask SCC Highways to hold a site visit at an advertised date and time, so that interested parties can express their concerns.
- d) Residents have also highlighted the effect on the environment; wildlife, trees and the Special Landscape Area, including this site. If this site is developed, then the entire village will lose the visual amenity of this Special Landscape Area. The Parish Council have already responded at SCDC's request to SCDC's Sustainability Analysis (attached at the back) [see attached document]; however many of our comments have not been incorporated in the Preferred Options. For example, the Parish Council advised that "To conserve and enhance the quality and local distinctiveness of landscapes and townscapes" should be marked "--" as opposed to SCDC's marking of "-/?".
- e) The pavement is insufficiently wide for pushchair and mobility scooters.
- f) At some point SCDC changed the indicative capacity from 7 to 15. Again this is an increase in housing beyond the capacity of the village's services and transport.
- C. Kirton should not be developed further unless local services and transport improve.
- a) The Parish Council has repeatedly stated that the current lack of services and transport in the village make it unsuitable to be developed as a dormitory, by further home building. To do so would impact greatly on the environment and quality of life of residents. The FPAAP's sustainability analysis makes clear that sites near centres of services and transport, such as Felixstowe and the Trimleys, score much higher on sustainability. Homes should be built near work places and retail, healthcare and transport facilities.
- b) As an example; those attending the Suffolk One Sixth Form College currently have to walk from Kirton to Trimley St. Martin to catch a bus to the school. Surely new housing should be located near services?
- c) There is particular concern that the housing increase in Kirton and Trimley St. Martin will put pressure on school capacity in the short and medium term; there has been no school capacity plan communicated which aligns with the site proposals. Further increase in the size of Trimley St. Martin School will cause deterioration of a currently severe traffic and parking problem at the school.
- d) As mentioned in the draft document, Anglia water will need to enhance the sewerage capacity if significant numbers of additional houses are built. This must be done as part of an end to end design, to ensure that problems are not created further up or downstream.

D. Bungalow Policy

SCDC have advised the Parish Council that SCDC cannot insist that bungalows are included in any future development, unless this is included as a policy in the FPAAP. The view of the village is that any future development should include bungalows.

Therefore, without in any way compromising the views above (that the village's lack of services and transport means that any further development is inappropriate), the FPAAP should include a statement that any future development in the village, which would be against the majority of parishioners' wishes and the Parish Council's advice, should include bungalows.

2. Physical Planning Boundary

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

O - 6973 - 2564 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

6973 Object

Housing

Preferred Policy FPP9: Land at Bucklesham Road, Kirton

Page 115. Appendix 5 Kirton Inset Map

Replace inset map with the originally proposed new village envelope - see below' [see attached document]; reviewed and agreed at public meeting with 250 parishioners, the Parish Council and representative from SCDC. Remove all proposed sites including 325a in the latest version, except for 712 which has already been approved.

3. Areas to be protected from development.

To include in the protected area of Falkenham the curtilage/area surrounding The Old Vicarage and The New House. This area has boundaries with the ANOB, the Church/Churchyard, open countryside and the curtilage of listed buildings. The area was previously protected from development as it was outside the village envelope and protection would put it in the same category as similar areas in Kirton and Bucklesham.

Being in a classification of Other Village or Open Countryside does not give protection from future development.

Summary:

Site 325a is the only unsustainable site in the list of preferred options and so should be removed. SCDC's sustainability analysis is overall negative for Social Effects, overall negative for Environmental Effects and slightly positive for Economic Effects. This gives an aggregate of negative sustainability, whilst every other preferred options site is assessed as positive sustainability. Residents have raised valid concerns about the access visibility to the road and also the danger and frequent jams due to large agricultural vehicles and buses negotiating the narrow road with tight bends, unable to pass each other.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

parpl2015fpaapPCresp.pdf

O - 7012 - 3813 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7012 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Sheila Fothergill [3813] Agent: N/A

Full Text: Re: Proposed development Bucklesham Road Kirton

Dear members of the council

I attended Kirton Parish council meeting on Monday evening to listen to the discussion about the proposed development. As a result I am writing again to outline some further points which I omitted from my first letter. These arguments will I hope underline the fact that the development of this piece of land is unreasonable.

- 1. I understand from a governor of the village school that it is virtually at capacity. It has a good reputation and competition for a place is quite fierce. Taylor-Wimpey are building sufficient homes in the village to meet the government target and with those homes come families with children. The school will have difficulty in accommodating these children let alone those from another development in the village. There is also a new housing estate being built in Trimley. Where will our village children go to school?
- 2. Associated with the school is the issue of traffic and parking. It is unsatisfactory for parents dropping off children to stop on the road outside the school at present. It is too narrow and leads to hold ups when cars are parked on the side. If houses are built at the other end of the village on Bucklesham Road inevitably parents are going to drive their children to school because it is a long way for little ones to walk and the pavement is very narrow and dangerous for a mother with buggy and toddler. An accident waiting to happen.
- 3. Continuing on the theme of traffic. At harvest time in particular this end of Bucklesham Road takes a great deal of agricultural machinery from large modern tractors to combine harvesters and truck loads of potatoes, sugar beet and onions. There is no footpath along this part of the road hence pedestrians and traffic are in conflict. To add more homes and people could be disastrous.
- 4. According to the Sustainability Appraisal Information page 39 of the FPAAP this site scores poorly in terms of environmental effects and it is unlikely that theses major negative environmental effects could be mitigated. Therefore how can you consider allowing this land to be developed?
- 5. This particular site on Bucklesham Road has been declared an SLA. There is little point in an SLA if the general public are not able to benefit from seeing it therefore it should not be hidden behind a "ribbon" of houses joining two existing lines of properties. The break in the line of dwellings is exactly what makes the village and allows it to sit beautifully in the countryside.
- 6. Finally I would like to complain about how the residents of Bucklesham Road were informed about this site being proposed for development by Suffolk Coastal District Council. I do not think that two A4 laminated notices pinned to two telegraph poles at either end of the site is sufficient particularly when one was in the hedge on the opposite side of the road from the footpath. A notification to each householder in the road would have been appreciated.

Summary:

This site on Bucklesham Road has been declared an SLA. There is little point in an SLA if the general public are not able to benefit from seeing it therefore it should not be hidden behind a "ribbon" of houses joining two existing lines of properties. The break in the line of dwellings is exactly what makes the village and allows it to sit beautifully in the countryside.

The village school that it is virtually at capacity, the school will have difficulty in accommodating more children. Associated with the school is the issue of traffic and parking.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7013 - 3888 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7013 Object

Housing

Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mr John Fothergill [3888] Agent: N/A

Full Text:

I write in response to the recent Preferred Options Consultation Document for the Felixstowe Peninsula Area Action Plan. This follows a drop in session in Kirton on 4th November, the recent Parish Council Meeting and conversations with neighbours and other villagers.

I refer to the SCDC FPAAP Preferred Option proposal to build on land at Bucklesham Road, Kirton, SHLAA reference: 325a. My wife and I believe strongly that these proposals are inappropriate, unjustified and unsustainable; we wish to register the strongest of objections.

- 1. This land is not simply a greenfield site; it is currently a beautiful view of classic Suffolk countryside enjoyed by all who walk into and out of the village. Many do, with and without their dogs, judging by those whom we see from our windows. It is a couple of hundred yards where passers-by can look over fields, hedgerows and standalone trees for well over a mile. This haven for wildlife is Grade 2 agricultural soil designated a Special Landscape Area and even your own document states that "it is unlikely that the major negative environmental effects could be mitigated" (page 39). I have heard a planner quoted as saying that the land to be developed is surrounded on three sides by housing, so building would make little difference. Nothing could be further from the truth; a strip of 15+ new houses would hide the view from pedestrians; only the landowner and occupiers could appreciate it. The half a dozen dwellings opposite plus one either side hardly "surround" and do not damage the view. This seems to be the last SLA in the village with most of the neighbouring land being more intensively farmed. Furthermore, I believe that the view from the listed building on the eastern side of this area would also be damaged; I thought the settings of listed buildings should be preserved?
- 2. We do not agree that this site is needed. Existing development in the village already provides more than the FPAAP requirement. Indeed I understand that there has been considerable development over the past decade and the face of the village has changed through this process of accretion. Facilities for residents have not improved, however. There is no shop, no Post Office, barely one pub and no school; the school at Trimley St Martin is close to being full. Increasing the population would cause further pressure on services, such as schools, roads and sewage and increase light pollution.

The need for bungalows also seems to be doubtful; already about 20% of the housing stock is single story so surely an increase would unbalance the demographic of the village. It seems that some residents did want the Taylor Wimpy development to include bungalows - in the heart of the village - but no one asked for a strip of such houses right out on the edge of things.

- 3. Bucklesham Road at this point has an S-bend, is narrow and is dangerous. Residents exiting on to the road must exercise great care because the visibility is so poor we must creep out half way in order to see. The road is about 6m wide and large trucks cannot turn into our 4m drive. If they park outside there is only just room for a bus to pass and larger farm vehicles cannot do so. The traffic levels are very high at times. Apart from the obvious rush hours, the use of the road by farm traffic can be very heavy indeed and when there is a problem on the A14, Kirton can become a rat-run. Building houses on the south side would make things very much worse. I believe, many years ago, building on this area was disallowed for this very reason.
- 4. There are drainage issues associated with this piece of land; our searches revealed a tendency to surface flooding possibly a low water table.
- 5. The sewage system along the road is notoriously poor with smelly drains and overflows into the ditch on the side in question. More properties here will, again, simply make the problems even more difficult for Anglian Water to solve.

In short, the loss of a wonderful open outlook, the lack of need and the poor road situation, among other considerations, mean this proposal should never have been included as a preferred option. The villagers thought the area had been rejected back at the beginning of this year. Why was the idea ever resurrected? We ask that this area of land is now removed from the list of preferred sites. Perhaps then your tag line

Suffolk Coastal . . . where quality of life counts

will really mean something in this village.

Summary:

This haven for wildlife is Grade 2 agricultural soil designated a Special Landscape Area and even your own document states that "it is unlikely that the major negative environmental effects could be mitigated" (page 39). We do not agree that this site is needed. Existing development in the village already provides more than the FPAAP requirement. There is no shop, no Post Office, barely one pub and no school; the school at Trimley St Martin is close to being full. Increasing the population would cause further pressure on services, such as schools, roads and sewage and increase light pollution.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7198 - 3917 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7198 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Miss/Miss E/E Croxford/Sugarman [3917] Agent: N/A

Full Text: This site is identified as a Special Landscape Area,

sites of this kind are becomiling increasingly rare and

this is the only one identified in Kirton.

Building on this site will inevitably increase road traffic,

already very heavy at certain times of day.

Agricultural vehicles need access to the farm track opposite the site, particularly adequate space on the road for turning. This may be made more difficult if the addition of a pavement on the South side causes narrowing of the highway.

Summary: This site is identified as a Special Landscape Area,

sites of this kind are becomi8ng increasingly rare and

this is the only one identified in Kirton.

Building on this site will inevitably increase road traffic,

already very heavy at certain times of day.

Agricultural vehicles need access to the farm track opposite the site, particularly adequate space on the road for turning. This may be made more difficult if the addition

of a pavement on the South side causes narrowing of the highway.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7313 - 3949 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7313 Comment

Housing

Preferred Policy FPP9: Land at Bucklesham Road,

Respondent: Pigeon Investment Management Ltd [3949] Agent: Strutt & Parker (Mr Richard Clews) [3945]

Full Text:

1 INTRODUCTION

- 1.1 This representation has been prepared by Strutt Parker LLP on behalf of Pigeon Investment Management Ltd in respect of land at Trimley St Martin, Alternative Option Site 3022a in response to the six week public consultation (19th October 2015 to 30th November 2015) on the Felixstowe Peninsular Area Action Plan, Preferred Options Document, hereafter referred to as the Felixstowe Peninsular AAP. It should be read in conjunction with the following documents copies of which are contained within the appendices and summarised in the delivery statement section of this consultation response below:
- * Site Plan;
- * Indicative Layout Plan;
- * Preliminary Drainage Appraisal October 2015;
- * Desk-based Archaeological Assessment;
- * Landscape and Visual Assessment;
- * Preliminary Ecological Appraisal; and
- * Transport Report
- * Phase 1 Contamination Report

2 EXECUTIVE SUMMARY

- 2.1 As set out in these representations there are some fundamental concerns regarding the soundness of the Felixstowe Peninsular AAP and the Area Specific Policies Development Plan Document (DPD). These relate specifically to the approach adopted and the plan's failure to allocate suitable sustainable sites to address the issues arising from the failure to clearly identify up to date objectively assessed housing need for the District. There appears to be a conflict with Policy SP2 of the Core Strategy (2013) and the requirements of the National Planning Policy Framework(NPPF).
- 2.2 In respect of the Felixstowe Peninsular AAP, at a site specific level, the concern is that the plan fails to take the opportunity to allocate additional land at Trimley St Martin in accordance with the development strategy set out in the adopted Core Strategy. The site in question, Alternative Option Site 3022a, was identified as suitable in the SHLAA 2014.

It is sustainable, available and deliverable. It would represent a logical extension to the physical development limits of the village. In accordance with the presumption in favour of sustainable development and the need to boost significantly the supply of housing it is contended that it should be included as a Preferred Allocation.

3 POLICY BACKGROUND

- 3.1 The Site Allocations and Area Specific Policies Development Plan Document Preferred Options Consultation Document, October 2015 has been published for public consultation along with the Felixstowe Peninsular AAP. These two documents seek to provide the policies and allocations necessary to implement the strategic policies set out in the Suffolk Coastal District Local Plan Core Strategy and Development Management Policies, July 2013 document. Together the Core Strategy, Site Allocations and Area Specific Policies Document and the Felixstowe Peninsula AAP will form the Development Plan for Suffolk Coastal District Council.
- 3.2 While this representation relates to the Felixstowe Peninsular AAP preferred options document and more specifically proposed allocations in the village of Trimley St Martin, it also has to be considered in the wider context of the planning policy framework for the whole of the District.

4 NATIONAL PLANNING POLICY FRAMEWORK

- 4.1 Paragraph 14 sets out that "a presumption in favour of sustainable development" is at the heart of the Framework and describes this as "a golden thread running through both plan-making and decision taking." It goes on to state that for plan- making this means:
- * "Local planning authorities should positively seek opportunities to meet the development needs of their area;
- * Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change..."

These requirements are repeated in more detail throughout the Framework. Paragraph 15 requires the presumption in favour of sustainable development to be applied to local plan policies so that development which is sustainable can be approved without delay.

- 4.2 The Core Planning Principles set out at paragraph 17 include a set of overarching objectives which should underpin plan making. Of particular relevance to this consultation response are that planning should be:
- * plan-led with up to date plans providing a practical framework for predictable and efficient decisions.
- * Not be about scrutiny but be a creative exercise.
- * Proactively drive sustainable development to deliver the homes the country needs.
- 4.3 Every effort should be taken to objectively identify and meet the needs of the area. Sufficient land suitable for development having regard to market signals should be
- 4.4 Paragraph 47 sets out a clear challenge to local planning authorities "to boost

significantly the supply of housing..." In order to achieve this they should ensure

that their Local Plan meets the full objectively assessed needs for the area and they should identify and annually update their five year housing supply.

4.5 For plan-making paragraph 151 advises that Local Plans should be consistent with the policies and principles of the Framework, "...including the presumption in favour of sustainable development."

C - 7313 - 3949 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7313 Comment

Housing

Preferred Policy FPP9: Land at Bucklesham Road, Kirton

- 4.6 Paragraph 154 requires Local Plans to be "...aspirational but realistic" and paragraph 159 reminds local planning authorities that they "...should have a clear understanding of housing needs in their area."
- 4.7 Finally, for a local plan to be found sound at examination by an independent inspector the Framework at paragraph 182 advises that it should satisfy the following tests, namely that it is:
- * "Positively prepared the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- * Justified the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- * Effective the plan should be deliverable over its period and based on effective joint working on cross- boundary strategic priorities; and
- * Consistent with national policy the plan should enable the delivery of sustainable development in accordance with the policies in the Framework."
- 4.8 For the purposes of this consultation it is necessary to consider whether the Felixstowe Peninsular AAP satisfies the above objectives.

5 APPROACH TO HOUSING GROWTH

Core Strategy

5.1 At the strategic level housing numbers and distribution are set out in the Core Strategy.

Objective 2 states:

"To meet the minimum locally identified housing needs of the district for the period 2010 to 2027, taking into account existing and future economic,

environmental and social opportunities and constraints'

In respect of this objective there are two important points to note. Firstly, that the Core Strategy seeks to meet the minimum locally identified housing need, and secondly, that it is a locally identified housing need for the plan period. 5.2 However, it is considered given the acknowledged short fall that the DPD and AAP should be based on the NPPF principles set out above including; to be aspirational; provide flexibility; positively seek to meet identified needs; and most importantly, to significantly boost housing supply. It is therefore considered that the Felixstowe Peninsular AAP should be setting its own, up to date and ambitious objectives.

- 5.3 Core Strategy policy SP2 sets out housing numbers and distribution. However, policy SP2 notes that provision will be made for at least 7,900 new homes, distributed in accordance with the settlement hierarchy set out in policy SP19. The policy then goes on to commit to an early review in order to identify the full objectively assessed housing needs for the District, to ensure this is met in so far as this is consistent with the policies of the NPPF.
- 5.4 The Inspector's report in respect of the Core Strategy Examination (June 2013) made it clear that an early review was essential as at the time the Council had identified an objectively assessed need of 11,000 dwellings. At paragraph 46 of the Inspector's Report he commented:

"Even if the theoretical capacity of all the sites included in the Strategic Housing Land Availability assessment (SHLAA), existing commitments potential brownfield opportunities, allocations carried forward from the previous Local Plan and a windfall allowance were taken into account, the provision would fall some way short of the 11,000 dwellings required."

5.5 At this point, the Inspector clearly gave consideration to suspending the Examination. However, he concluded that as none of the adjoining Councils had objected to the scale of housing proposed, that having a core strategy in place with an early review would be preferable to the alternative of suspension of the examination and the likely withdrawal of the plan.

5.6 While it is noted that the Site Allocations and Area Specific DPD Issues and Options consultation commenced in 2015, it is of significant concern that this occurred ahead of the objectively assessed housing needs for the District being reviewed, updated and firmly established. Policy CS2 states:

"An early review of the Core Strategy will be undertaken, commencing with the publication of an Issues and Options Report by 2015 at the latest. The review will identify the full, objectively assessed need for the District and proposals to ensure that this is met in so far as this is consistent with the policies in the National Planning Policy Framework."

5.7 On the basis of the currently available information the Felixstowe Peninsular AAP and the DPD are inconsistent with this adopted policy, and paragraph 158 of the NPPF which requires that the Local Plan is "...based on adequate, up-to-date and relevant evidence..."

5.8 Table 3.1 of the Core Strategy references the need for an extra 11,000 dwellings as identified in the work commission by Oxford Economics (OE) in 2010. It goes on to suggest that the review should identify land to meet the current acknowledged shortfall between the locally assessed requirement and the OE objectively assessed need (OAN). However, the District still does not appear to have a published understanding of its current OAN. The OE figure of 11,000 dwellings is very old and predates the NPPF. As advised in Planning Practice Guidance regarding housing need assessments, the household projections published by the Department for Communities and Local Government provide the starting point estimate of overall housing need (ID: 2a-015-20140306). The DCLG estimate may require adjustment to reflect factors affecting local demography and household formation rates. However, the Sub National Household Projections (2015) suggest a growth of 8,362 for the period 2010 to 2027 and this is not

referenced in the SAASP document or the AAP. This indicates that the Core Strategy figure promoted in the SAASP is out of date. While the DCLG figure is lower than the OE figure, it is clear that the Core Strategy proposal to provide 7,900 homes is lower than the most recent projections that the Council should be considering as a starting point for

C - 7313 - 3949 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

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Preferred Policy FPP9: Land at Bucklesham Road, Kirton

understanding its OAN. On the basis that the 2010 OE figure was 11,000, the reality is that the actual objectively assessed need figure is likely to be higher than 8,362 and that 7,900 would fail to meet the OAN.

5.9 Policy FPP1 of the Felixstowe Peninsular AAP gives the impression that it is still working to the Core Strategy target of 7,900 and does not explain if it is actually working to the OE figure or some other estimate and if so what that actually equates to for the AAP. On this basis there must be a concern that at examination the Felixstowe Peninsular AAP will not be found to comply with the tests set out in paragraph 182 of the NPPF, failing all the tests.

Five Year Housing Supply

5.10 In June 2015 Suffolk Coastal District Council published a Housing Supply Land Assessment. This covers the period 1st April 2016 to 31st March 2021 and identifies the current position with regard to identifying a five year +5% supply of housing land which it assess as 5.12 years.

5.11 Paragraph 3 acknowledges the supply in 2014 was 4.3 years this is a figure which has been borne out in appeal decisions as recently as September 2015

(APPJ3530/A/14/2225141). Fundamentally, the current assessment is still based on the Core Strategy target of 7,900. As set out above, this is an acknowledged under estimate of the actual objectively assessed need, which in the absence of anything more up to date, on the best available evidence suggests a target in the region of 11,000 dwellings. 5.12 In addition, it is also observed that the projections contained in table 3 still appear to rely on the early unconfirmed delivery of some large developments with outline permission which are still subject to S106 agreements. Taking these factors into consideration the five year supply with a modest surplus of 0.12 years, must reasonably be considered vulnerable to challenge at this time. If the 11,000 dwelling figure or even the lesser DCLG Household projection of 8,362 are applied then a five year supply in all probability does not actually exist and is at best 4.75 years.

5.13 Again, this point suggests that the Felixstowe Peninsular AAP will struggle to

demonstrate compliance with paragraph 182 of the NPPF at examination and reinforces the need to allocate additional land within the AAP.

Felixstowe Peninsular AAP

5.14 The overall spatial strategy set out in the Core Strategy (see policy SP2) provides for development to be focused in the Eastern Ipswich Plan Area, at Felixstowe and the Trimley Villages and shared between the market towns. Policy SP19 identifies that Felixstowe, Walton and the Trimley Villages will accommodate a proposed housing growth of 22%. Furthermore the Strategic Housing Land Availability Assessment (March 2014) acknowledges:

"The core Strategy expects the Market Towns and the Felixstowe and the

Trimleys area to accommodate a considerable proportion of the growth identified for the district to 2027".

5.15 The Felixstowe Peninsula AAP in policy FPP1 identifies a minimum requirement for a further 807 units before 2027 as necessary to meet the Core Strategy requirement. However, as previously mentioned above these figures are a minimum and the AAP should be seeking to maximise delivery in sustainable locations in order to boost significantly the supply of housing as required by the NPPF. It is therefore contended as set out in more detail above, that policy FPP1 should be setting a more ambitious target, and in the absence of any more recent objectively assessed need, looking to a District target of 11,000 dwellings rather than the 7,900 derived from the Core Strategy. Policy FPP1 should therefore be reworded to identify a higher overall target and as such an appropriate apportionment, for Felixstowe Peninsular. 5.16 It must be acknowledged that the AAP states at paragraph 3.13:

"The Felixstowe Peninsula AAP identifies over 1,100 units on the preferred sites outlined in this document. The Council consider it necessary to over allocate sites across the district to ensure that a five year land supply is maintained which is paramount. Over allocating also provides a range of sites, sizes and locations for development to allow a choice of location for those looking for a residential property. It also takes into account that the population is growing and that the Council's objectively assessed housing need is likely to increase in the future.

The delivery of sites will be monitored throughout the plan period to consider how the AAP is performing against the Core Strategy targets."

5.17 While this additional provision is welcome, it is still unclear if it will provide sufficient sites, which are available and deliverable, to enable the District to demonstrate a five year housing land supply in the short term. The current five year supply is not based on an up to date objectively assessed need. It is therefore contended, that opportunities should be taken to allocate more sustainable sites that can be delivered in accordance with Core Strategy spatial strategy so that the District can significantly boost its supply of housing as required by the NPPF. These sites should allow for variety in house types and

tenures to come forward to meet local needs and ensure choice and competition in the market for land (NPPF paragraph 47).

5.18 From the statement in paragraph 3.13 the Council appears to be acknowledging that the objectively assessed need is rising and site allocations should reflect this. It would therefore seem logical, and in the interests of good planning, for them to plan to meet this need now, by way of the allocation of further sustainable sites.

Felixstowe Peninsular AAP Preferred Site Allocations

5.19 The Felixstowe Peninsular AAP identifies 7 sites as preferred option allocations. Two of these are in Trimley St Martin and one in Trimley St Mary and are identified on the inset maps in the AAP. A summary of the 7 sites is set out below along with some brief summary observations in italics which are considered relevant to this consultation response: 5.20 Preferred Policy FPP3: Land at Sea Road, Felixstowe

Land is identified at Sea Road, Felixstowe for a mixed use development of commercial /tourism uses and residential dwellings. (Indicative Capacity 40 dwellings)

C - 7313 - 3949 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

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It is noted that this is a mixed use site and residential development will be dependent on

There is also an issue with sewage capacity which may impact on viability. Finally if the market has to be relocated this could also significantly delay delivery.

5.21 Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

Land is identified north of Walton High Street for a mixture of residential units; including on site open space,

comprehensive landscaping and new business units. (Indicative Capacity 400 dwellings)

This site is dependent on the Rifle Club being relocated, requires a master plan to

include a link road which could in turn impact on viability. The policy acknowledges that it is likely to be a longer term opportunity. There are also air quality and sewage capacity issues to be resolved.

5.22 Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Land is identified to the north of Conway Close for a residential development. (Indicative Capacity 150 dwellings) The site could come forward, however, there are still sewage capacity and air quality issues to be addressed and the site is adjoined by heritage assets.

5.23 Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St

Martin Land is identified on Trimley High Road for residential development with on site open space to provide a village green. (Indicative Capacity 70 dwellings)

The site could come forward with access on to the High Street. The Public House is a listed building and therefore development proposals will have to be sensitive to its status which may limit capacity.

5.24 Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

Land is identified at Howlett Way for residential development with on site open space. (Indicative Capacity 360 dwellings)

Access to the site has not been identified in detail other than off Howlett Way. There are air quality issues and concerns regarding the setting of the Old Rectory. In addition there is a water main crossing the site. The site wraps round the Old Poultry Farm and the Old Rectory both of which may delay availability.

5.25 Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

Land is identified south of Thurmans Lane for residential development. (Indicative

Capacity 100 dwellings)

This site could come forward, again it is subject to air quality issues and the need to have regard to Mill Farm a Grade II Listed Building, it will also have to be accessed through the adjoining residential areas.

5.26 Preferred Policy FPP9: Land at Bucklesham Road, Kirton

Land is identified south of Bucklesham Road for residential development. (Indicative Capacity 15 dwellings)

This is a relatively small ribbon development site which could come forward. There are potentially issues to be resolved in respect of local sewage capacity in the village.

Assessment of Preferred Allocations

5.27 If the preferred site allocations indicative capacities are totalled up cumulatively this suggests they could deliver 1,135 dwellings between them. However, as set out above the delivery, and more importantly, the quantum and likely timing of delivery is much less certain. It is noted that the two largest sites, FPP8 and FPP4 do not appear to be very advanced. With this in mind in order to maintain a realistic five year supply it will be important for the District to maintain the delivery of smaller sites which can readily come forward.

6 ALTERNATIVE OPTION SITE 3022A

6.1 The site the subject of this representation, Alternative Option Site 3022a is just such a site and accordingly it is contended that it should be included as a preferred allocation on the basis that it is available and deliverable at the present time. In addition, it does not need to overcome the issues and constraints associated with some of the preferred allocations set out above and as such can contribute to the acknowledged shortfall in housing need, within the first five years of the Plan period. It is also contended that the AAP should be more ambitious in order to meet local housing need and it would be appropriate for the site to be included based on the presumption in favour of sustainable development

6.2 When considering the Trimley Villages and the opportunities for further allocations, Trimley St Mary is the larger of the two settlements and any significant further expansion may potentially undermine the sustainability of it as a village. Trimley St Martin being the smaller of the two settlements would appear to have greater capacity to absorb further growth. Trimley St Mary is also constrained by its proximity to Felixstowe, the ANOB designation to the south-west, the A14 to the north-east and its proximity to Trimley St Martin to the north. There are therefore few obvious alternative locations for the expansion of its physical development limits. On this basis, there is considerably more potential to be looking at a further extension of the physical development limits of Trimley St Martin.

6.3 In so far as this consultation is concerned, clearly a further allocation on the northwestern side of Trimley St Martin would make a positive contribution towards housing delivery. Alternative Option Site 3022a is in a sustainable location and is not environmentally sensitive. It does not represent a risk of coalescence and is a natural and logical extension of the settlement with clear and defensible boundaries. It is contained to the north-east by the allotment gardens, by the existing built development in the western corner, the road and established settlement to the south. As set out below it is a deliverable site with no obvious constraints or limitations. It is available and could come forward very quickly to make an almost immediate contribution to boosting local housing supply. As such, it is considered that it should be identified as a preferred

residential site allocation.

Sustainability Appraisal

6.4 It is surprising that Alternative Option Site 3022a did not score more highly in the Preferred Options Sustainability Appraisal when compared to the preferred sites listed above.

C - 7313 - 3949 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

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6.5 The overall assessment concluded for site 3022a as follows:

"The site scores well in terms of economic effects due to its close proximity to employment opportunities and given relatively good public transport provision. The loss of Grade 2 agricultural soil results in a major negative environmental effect. However, there may be scope for mitigation."

6.6 In response to the major negative environmental effect of using Grade 2 agricultural land, it is clear that there is no difference with the conclusions for a number of preferred allocations. The proposed site is on the boundary of grade 2/3 agricultural land. All undeveloped and proposed allocation sites within Trimley St.Mary and Trimley St.Martin are on Grade 2 Agricultural Land. The proposed site is therefore no more important for protection as agricultural land than the allocated sites and may in fact be less desirable due to the size of the site and the overall quality. One of the objectives where the site did not score very favourably was in respect of SA Objective 8, to improve the quality of life and where people live. The SA comment here incorrectly assumed that the site will be accessed via the adjoining estate roads and as such could potentially result in a negative

impact for local residents. The reality, as set out in more detail in the delivery statement below, is that access can be provided directly on to High Road.

6.7 In respect of the site assessments and commentaries for the preferred allocations set out in the AAP, there appear to be a number of reoccurring themes which do not necessarily appear to be reflected in the sustainability appraisals. These are as follows:

Air Quality: This is clearly an issue with air quality assessments being required for the majority of the preferred allocation sites. This is an issue, particularly associated with proximity of the sites to the urban area of Felixstowe and major transport routes including the A14. In respect of the majority of the preferred allocations, and in particular the largest sites, these are more closely related to the A14 and Felixstowe than Alternative Option Site 3022a. As such, simply on the basis of the degree of separation, it can be concluded that site 3022a will perform better in respect of air quality.

Sewage Capacity: Sewage capacity is an issue raised by Anglian Water in respect of the Felixstowe sites and the site in Kirton. These sites potentially require improvement to the capacity of the foul sewer network. This does not appear to be an issue for the Trimley Villages and as set out in the delivery strategy below a preliminary foul and surface water drainage strategy has already been prepared for Alternative Option Site 3022a.

Noise: The potential impact of noise does not appear to have been given much consideration. It should be noted, that some of the preferred allocations lie adjacent to junctions on the A14. These sites or parts thereof may be susceptible to noise disturbance which may require mitigation and/or potentially reduce the developable area. Alternative Option Site 3022a, lies to the south of the A14 separated by the established allotment gardens and as such is unlikely to be adversely affected by noise from the road.

Transport Assessments: The larger preferred option allocations will require transport assessments to be carried-out. These may potentially reveal highway safety or capacity issues which could impact on the quantum of development achievable and delay delivery. This would not be necessary with the scale of development proposed on Alternative Option Site 3022a.

Heritage Assets: A number of the preferred option sites have a close relationship with existing heritage assets. In some cases the SA scored these relationships to be positive on the basis that the setting may be improved. It does not necessarily seem reasonable that a site that will have an impact on heritage assets should score more highly than one where heritage assets are unaffected as is the case with Alternative Option Site 3022a.

6.8 In conclusion it is clear from the above that Alternative Option Site 3022a has many advantages over some of the preferred allocation sites and there are no obstacles to it coming forward for development. It is in a sustainable location and could readily deliver much needed housing, including affordable housing, a significant social benefit, with very limited environmental consequences. This assessment further supports the case that it should be included as a preferred allocation.

Deliverability

6.9 Trimley St Martin lies to the west of Felixstowe, between the A14 to the north-east and the railway line to the south-west. The village of Trimley St Mary lies immediately to the south east separated by a small gap. The 2011 Census reported the population of Trimley St Mary as 3,673 and the population of Trimley St Martin as 1,932. The two villages are immediately adjacent to Felixstowe and identified in the Core Strategy as Key Service Centres due to their extensive range of facilities and proximity to Felixstowe.

6.10 Alternative Option Site 3022a, is situated on the north-western side of the village. It lies to the east of High Road, which runs parallel with the A14, connecting Felixstowe via the A1156 to Ipswich. The south-eastern side of the site abuts the residential properties of Mill Close with extensive allotment gardens lying to the north-east. The western corner of the site contains a group of existing dwellings and buildings used for commercial purposes. Beyond the site to the north-west are arable fields.

6.11 The site was in part submitted and considered under the SHLAA 2014 (site 383a) it was discounted due to concerns regarding vehicle access. Mill Close was not considered to be suitable as an accesses route and the Highway

C - 7313 - 3949 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

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Authority was not in favour of direct access from High Road.

6.12 Since 2014 extensive work has been undertaken by Pigeon Investment Management Ltd to overcome the concerns relating to access and demonstrate the sites deliverability. A summary of the work to date is set out below which demonstrates the site's deliverability.

Indicative layout plan

6.13 An indicative layout plan, drawing number 015 - 015 - 00 has been prepared for the site (see Appendix). This shows how the site could be developed to deliver a range of house types including 18 affordable units. The proposed layout demonstrates that the site can deliver housing which respects the surrounding pattern of development. A strong frontage along high Road will provide a connection between the existing settlement and the group of existing buildings to the west of the site. This will be focused around the new highway access which will create an attractive and framed entrance into the development. The internal layout picks up on pedestrian connectivity through to Mill Close providing some additional frontage plots in the eastern corner of the site.

Elsewhere the proposed dwellings and street layout seeks to extend the established pattern of buildings along the site boundaries. Open space and gardens are provided along the north-eastern boundary in order to respect the presence of the allotment gardens. A large area of open space to serve the development (and the existing village) is proposed to the north which will provide a sensitive edge and integration with the open farm land beyond.

6.14 The layout demonstrates that an appropriate density of development can be provided along with a range of house types. The proposed layout can also meet garden space requirements and parking provision while respecting the amenities of adjoining residential properties.

Affordable Housing

6.15 The indicative layout shows the site could include 18 affordable units, including a variety of house types and sizes to meet local need. This will be a significant local benefit.

Heritage Assessment

6.16 The site does not lie with or adjacent to a conservation area and there are no Listed Buildings or other Heritage Assets on or nearby.

6.17 A desk-based assessment of archaeological significance was undertaken in November 2015. This report concludes that there is no evidence that proposed development will have any impact on the significance or setting of designated heritage assets of archaeological interest. It suggests that development could have an impact on the significance of undesignated heritage assets indicated by crop marks but that their significance is unlikely to be sufficient to preclude development and impact on them may be mitigated by the formulation of an appropriate archaeological strategy.

Flood Risk

6.18 The entire site is located within Flood Zone1; land assessed as having a low probability of flooding from fluvial sources. In addition, the site is not identified to be at risk from surface water or reservoir flooding, according to the Environment Agencies Flood Maps for Planning.

6.19 The development will not increase the risk of flooding post development as attenuation measures will be provided on site as part of the proposal to accommodate surface water run-off generated from the critical duration 1 in 100 year event, including an allowance for climate change.

Drainage Strategy

6.20 A preliminary drainage strategy has been prepared for the site which concludes that foul water from the development will be able to flow via gravity to the existing Anglia water sewer located in the High Road.
6.21 In respect of surface water drainage the underlying geology is expected to be of high permeability which will allow surface water run-off to discharge via infiltration. It identifies that an infiltration basin can be provided within the public open space to accommodate surface water run-off from the proposed highway. The surface water from roofs can be discharged via soakaways with permeable paving included to drain the private access roads, parking areas and driveways.

Landscape and Visual Assessment

6.22 A landscape and visual assessment of the site has been carried out and it concludes that there is capacity within the landscape to absorb change.

6.23 It suggest that given the nature, character and visual quality of the existing settlement edge and the poor quality of the existing edges of the site, it has a High Capacity to accommodate change, and the potential to enhance the settlement edge.

6.24 As such there are few constraints or issues in landscape and visual terms that would prevent the site being considered for development.

Preliminary Ecological Appraisal

6.25 A preliminary ecological appraisal has been carried out for the site. Ten habitats were identified during the Extended Phase 1 Habitat Survey including scattered broadleaved and coniferous trees, scattered scrub, poor semi-improved grassland, scattered bracken, tall ruderal, arable, introduced shrub, and species-poor intact and defunct hedgerows. In addition the field margins on-site provide opportunity for common invertebrates, reptiles, birds, and foraging / commuting bats. The report makes a series of recommendations in respect of mitigation measures and good practice during development however, no Phase 2 survey work was required. It is clear that there are no ecological barriers to the

sites development.

C - 7313 - 3949 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7313 Comment

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Transport Report

6.26 Å transport report has been prepared for the site which concludes that the proposed development can be served by an acceptable access to the highway network. The report confirms that the site is located in a sustainable location with bus stops on the boundary providing frequent services and footway connections to local facilities.

6.27 A new access can be provided onto High Road which complies with highway standards and provides adequate visibility and capacity. The existing local infrastructure can support the additional traffic generated, including through the use of more sustainable modes of transport as alternatives to the private motor car, such as cycling, walking and public transport.

6.28 The transport report confirms that access can be provided directly onto High Road and that it will not be necessary to take access via Mill Close as assumed in the assessment of the SHLAA 2014 (site 383a). This therefore overcomes the key reason for the site being discounted due to concerns regarding vehicle access.

7 CONCLUSION

7.1 As set out above and referred to elsewhere in this consultation response Alternative Option Site 3022a is available and deliverable. There are no obstacles to its development and clearly proposals are at an advanced state. The indicative layout confirms that a policy compliant scheme can be delivered which will include market and affordable housing, a large area of open space and improved connectivity.

7.2 As indicated in the landscape and visual assessment, the proposed development will be an attractive addition to the settlement, improving the quality of existing north western edges of the village.

7.3 The site is not in a flood risk area and can be suitably served by both foul and surface water drainage.

7.4 Development of the site will have no impact on designated heritage assets and any impact on undesignated assets can be mitigated. Additionally, there are no ecological barriers to the sites development.

7.5 The site is in a sustainable location with good access to local services and facilities. A new point of vehicle access, which accords with adopted standards, can be provided to High Road overcoming the original reason for the site being discounted in the SHLAA 2014 (site 383a).

7.6 Policy FPP1 of the Felixstowe Peninsular AAP is still working to the Core Strategy target of 7,900 rather than the 11,000 OE figure or an up to date objectively assessed need, as required by Core Strategy Policy SP2. In addition, the current five year supply is not based on an up to date objectively assessed need. It is therefore contended, that the Felixstowe Peninsular AAP should take the opportunity to allocate more sustainable sites that can be delivered in order to meet the requirement of the NPPF to "significantly boost its supply of housing" and assist in the maintenance of a five year supply of housing land.

These sites should allow for variety in house types and tenures to come forward to meet local needs and ensure choice and competition in the market for land (NPPF paragraph 47).

7.7 In conclusion, it is clear that Alternative Option Site 3022a has many advantages over some of the preferred allocation sites and there are no obstacles to it coming forward for development. It is in a sustainable location and could readily deliver much needed housing, including affordable housing, a significant social benefit, with very limited environmental consequences. It does not represent a risk of coalescence and is a natural and logical extension of the settlement with clear and defensible boundaries.

7.8 For the reasons set out above it is clear that Alternative Option Site 3022a should be included as a preferred allocation in the Felixstowe Peninsular AAP.

APPENDICES [see attached documents]

See Attachments to Representation Submission for following documents:

- A. Location Plan
- B. Indicative Layout Plan
- C. Preliminary Drainage Appraisal (October 2015)
- D. Desk-based Archaeological Assessment
- E. Landscape and Visual Assessment (November 2015)
- F. Preliminary Ecological Appraisal
- G. Transport Report
- H. Phase 1 Contamination Report

Summary:

Land is identified south of Bucklesham Road for residential development. (Indicative Capacity 15 dwellings) This is a relatively small ribbon development site which could come forward. There are potentially issues to be resolved in respect of local sewage capacity in the village.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

Appendix C - Prelimiary Drainage Appriasal Nov 15 trimley.pdf

Appendix C - Prelimiary Drainage Appriasal Oct 15 trimley.pdf

Appendix D - Trimley St Martin Desk Based Archaeological Assessment.pdf

Appendix E - FR 3659 Figure 3 Landscape and Heritage Designations and Public Rights of Way.pdf

C - 7313 - 3949 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7313 Comment

Housing

Preferred Policy FPP9: Land at Bucklesham Road, Kirton

Appendix B - Indicative Layout Plan (015-015-002).pdf

Appendix A - Location Plan Trimley.pdf

Appendix E - FR 3659 Figure 2 Statutory Designations(1).pdf

Appendix E - FR 3659 Figure 5 Photosheets_LR.pdf

Appendix E - Landscape and Visual Assessment Summary November 2015.pdf

Appendix F - preliminary Ecology Appraisal Trimley.PDF Appendix G - Transport Statement (November 2015).pdf Appendix H - Phase 1 Contamination Report (Pt1).pdf Appendix H - Phase 1 Contamination Report (Pt2).pdf

Appendix E - FR 3659 Figure 4 Landscape Charcter Assessment.pdf Appendix E - FR 3659 Figure 1 Site Plan with Photo Locations(1).pdf

C - 7387 - 3952 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7387 Comment

Housing Preferred Policy FPP9: Land at Bucklesham Road, Kirton

Respondent: Anglian Water (Mr Stewart Patience) [3952] Agent: N/A

Full Text:

Thank you for the opportunity to comment on the Site Allocations and Area Policies Preferred Options Document and Felixstowe Peninsula Area Action Plan. Please find enclosed comments on behalf of Anglian Water.

Site Allocations and Area Specific Policies Preferred Options Consultation Document

Policy SSP3: Land rear of Rose Hill, Saxmundham Road Aldeburgh

Anglian Water has no objection to the proposed allocation of this site for open market housing and a care home.

Paragraph 2.28 (page 30)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.28 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP4: Land at Mill Road Badingham

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.32 (page 32)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.32 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP5: Land Adjacent to Corner Cottages, Main Road, Benhall

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP6: Land south of Brook Cottage, Benhall

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.35 (page 34)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.35 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP7: Land opposite Townsfield Cottages, Dennington

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.40 (page 37)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.40 should be amended to refer to the management of surface water run off in

C - 7387 - 3952 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7387 Comment

Housing

Preferred Policy FPP9: Land at Bucklesham Road, Kirton

accordance with the surface water management hierarchy.

Policy SSP8: Land south of Ambleside, Main Road, Kelsale cum Carlton

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.46

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.46 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP9: Land north of Mill Close, Orford

It is expected that there may be a need for improvements to the sewerage treatment capacity to enable the development of this site.

Policy SSP10: Land west of Garden Square Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP10:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP11: Land rear of 3 -33 Suffolk Drive, Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP11:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP12: Land north-east of Street Farm

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP12:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP13: Land fronting Old Homes Road, Thorpeness

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP13:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP14: Land south of Lower Road Westerfield.

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP15: Land at Old Station Works, Main Road Westerfield

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP15:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP16: Land at Street Farm, Witnesham (Bridge)

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP17: Land south of the primary school, Witnesham

Anglian Water has no objection to the proposed allocation of this site for residential development.

C - 7387 - 3952 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7387 Comment

Housing

Preferred Policy FPP9: Land at Bucklesham Road, Kirton

Policy SSP18: Ransomes, Nacton Heath

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP13:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP19: Land at Silverlace Green(former airfield) Parham

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required.

Therefore it is recommended that these issues are investigated further and Policy SSP19 is amended accordingly.

Policy SSP20: former airfield Parham

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required.

Therefore it is recommended that these issues are investigated further and Policy SSP20 is amended accordingly.

Policy SSP21: former airfield Debach

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required. Therefore it is recommended that these issues are investigated further and Policy SSP21 is amended accordingly.

Policy SSP22: Bentwaters Park, Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP22:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP23: Carlton Park, Main Road, Kelsale cum Carlton

Anglian Water has no objection to the proposed allocation of this site for employment development.

Policy SSP24: Levington Park, Levington

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP24:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP25: Riverside Industrial Estate, Border Cot Lane, Wickham Market

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP25:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP31: Snape Maltings

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site for arts, recreation and tourism related development. It is therefore suggested that the following text should be include in Policy SSP25:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Felixstowe Peninsula Area Action Plan Preferred Options Consultation document

Policy FPP3:Land at Sea Road, Felixstowe

C - 7387 - 3952 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7387 Comment

Housing

Preferred Policy FPP9: Land at Bucklesham Road, Kirton

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP4: Land north of Walton High Street, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP5: Land north of Conway Close, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is therefore suggested that the following text should be include in Policy FPP6:

'Improving the capacity of the foul sewerage network'

Policy FPP7: Land off Howlett Way, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is therefore suggested that the following text should be include in Policy FPP7:

'Improving the capacity of the foul sewerage network'

Policy FPP8: Land off Thurmans Lane, Trimley St Mary

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP8:

'Improving the capacity of the foul sewerage network'

Policy FPP9: Land at Bucklesham Road, Kirton

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Policy FPP9 refers to 'reinforcement of connections'

The term reinforcements is normally used in the context of water mains and not foul sewers when referring to improvements within the network.

It is therefore suggested that the following text should be include in Policy FPP9:

'Improving the capacity of the foul sewerage network through reinforcement of connections by making necessary improvements to ensure that capacity can be made available'

Policy FPP10: Port of Felixstowe

It is noted that it proposed to allocate land at the Port of Felixstowe for strategic employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Policy FPP11: Land at Bridge Road, Felixstowe

It is noted that it proposed to allocate land at Bridge Road for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Policy FPP12: Land at Carr Road/Langer Road, Felixstowe

It is noted that it proposed to allocate land Carr Road/Langer Road for employment uses.

C - 7387 - 3952 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7387 Comment

Housing

Preferred Policy FPP9: Land at Bucklesham Road, Kirton

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP12:

'Improving the capacity of the foul sewerage network'

Policy FPP13: Land at Haven Exchange, Felixstowe

It is noted that it proposed to allocate land at Haven Exchange for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP13:

'Improving the capacity of the foul sewerage network'

Summary: It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this

site. Policy FPP9 refers to 'reinforcement of connections'

The term reinforcements is normally used in the context of water mains and not foul sewers when referring to

improvements within the network.

Change to Plan It is therefore suggested that the following text should be include in Policy FPP9:

'Improving the capacity of the foul sewerage network by making necessary improvements to ensure that capacity can

be made available'

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7507 - 4027 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7507 Comment

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

N/A Respondent: John Court [4027] Agent:

Full Text: Preferred Policy FPP9 Site 451F SHLAA ref 325A Land at Bucklesham RO Kirton

> Main chart data is out of date. Covered in a 'small print' inclusion of Violet Gardens (B+M) development 43 dwellings more than covers our minimum government requirements, and more individual projects will take place by 31.3.2027 being planned but not yet disclosed for 1&5 Burnt House Lane area & gardens.

Section 3.76

The footpath is needed anyway on the south side of Bucklesham Road as the existing footpath stops at 96 although

houses go to 137. The north side has layby's with cars.

Bungalows for downsizing will be built 'up to a price' as the potential occupier will have proceeds from a large house. We need small units that downsizing from a 3 bed semi in the village can afford after retirement, without a loan.

Site 451F

This is minimum of 15 - does not include 'affordable' proportion required under planning so actual number will be greater

which will have further ramifications on services and quality of life of the local people.

This is minimum of 15 - does not include 'affordable' proportion required under planning so actual number will be greater Summary:

which will have further ramifications on services and quality of life of the local people.

Change to Plan

Appear at exam? Legal? Sound? **Duty to Cooperate? Soundness Tests**

Not Specified Not Specified Not Specified Not Specified None

O - 7511 - 4028 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7511 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: J P Jones [4028] Agent: N/A

Full Text: I would like to object to any planning permission for development of the above mentioned land for the following reasons:

1. Access to traffic along Bucklesham Road at this point is on a bend, restricting view in both directions. The road is narrow, and at times congested. In cases of heavy or prolonged rain the road floods, and on occasions raw sewage is

evident.

- 2. The development would cause the loss of grade 2 agricultural land.
- 3. A loss of panoramic view, enjoyed by residents and walked along, also a loss of wildlife.
- 4. In recent years, much housing development has taken place in Kirton, further development would have a negative impact on the village.

Summary:

- 1. Access to traffic along Bucklesham Road at this point is on a bend, restricting view in both directions. The road is narrow, and at times congested. In cases of heavy or prolonged rain the road floods, and on occasions raw sewage is evident
- 2. The development would cause the loss of grade 2 agricultural land.
- 3. A loss of panoramic view, enjoyed by residents and walked along, also a loss of wildlife.
- 4. In recent years, much housing development has taken place in Kirton, further development would have a negative impact on the village.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot Specified

O - 7517 - 4031 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7517 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: A Clegg [4031] Agent: N/A

Full Text: 1. I do not like the idea as it's a greenfield site, also we have satisfied by TW site. TW site which was part brown field.

2. The site is also across the road from a Grade II Listed building, The Manor.

3. The ground is also reported to have sewerage flooding adjacent to 101 Bucklesham Road also its on a high water

table.

4. It also is on a very bad corner - poor visibility.

5. Impact on the last remaining special landscape area, with wildlife impact = bat and hares.

6. Also land already approved is more than sufficient until 2027 for Kirton.

Summary: I do not like the idea as it's a greenfield site, also we have satisfied by TW site. TW site which was part brown field.

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table.

It also is on a very bad corner - poor visibility.

Impact on the last remaining special landscape area, with wildlife impact = bat and hares.

Also land already approved is more than sufficient until 2027 for Kirton.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7518 - 1608 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7518 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Geoffrey Christian [1608] Agent: N/A

Full Text:

- 1. These houses are being built on a green field site, spoiling a beautiful unspoilt area.
- 2. The site is situated on a blind bend and this road does have traffic travelling faster than the speed limit.
- 3. I and many others requested some bungalows on the B&M site which is close to the hub of the village. Are we really intending to build bungalows for the elderly and disabled on the periphery of the village, with fast moving traffic going by the door.
- 4. The village has no infrastructure. No shop, post office, chemist, doctor or decent bus service. Why are we building over our allocation here. Why not build at Woodbridge with its facilities.
- 5. This peninsula is frequently isolated when an accident occurs on the A14 why are we building on it without any thought or provision for the extra car traffic. Why not Woodbridge?
- 6. We have issues with the sewage system in the village, over many years. When I was Deputy Chair of the PC I had many meetings with them (Anglian Water) and basically the problem is an old 6" pipe system taking sewage from Bucklesham and Kirton. Making improvements around the site will just cause flooding and stink at the usual places down the line.
- 7. Consultation seems just a farce.

Summary:

These houses are being built on a green field site, spoiling a beautiful unspoilt area.

The site is situated on a blind bend and this road does have traffic travelling faster than the speed limit.

Are we really intending to build bungalows for the elderly and disabled on the periphery of the village, with fast moving traffic going by the door.

The village has no infrastructure. No shop, post office, chemist, doctor or decent bus service. This peninsula is frequently isolated when an accident occurs on the A14.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7523 - 4035 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7523 Comment

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: . Anonymous [4035] Agent: N/A

Full Text: My family are Kirton villagers, whilst we want Greenfield sites protected. Housing for young people (within their earning

range.. has anyone checked what their average is for Felixstowe area??) and older people (who would like to downsize)

should be considered in preference to larger residences please.

Summary: My family are Kirton villagers, whilst we want Greenfield sites protected. Housing for young people (within their earning

range.. has anyone checked what their average is for Felixstowe area??) and older people (who would like to downsize)

should be considered in preference to larger residences please.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 7536 - 1553 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7536 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mr & Mrs D Gracey [1553] Agent: N/A

Full Text:

Regarding proposal to build between 71 and 101 Bucklesham Road, Kirkton, on a designated greenfield site in a special landscape area.

- 1. The village has asked me to write as owner of the listed Georgian manor house, dated 1740, directly opposite (see enclosed photo) this proposed building site. We form a traditional cluster of old buildings together with the three very old cottages next to the site. It is a charming group at the entry to Kirton which is greatly appreciated and valued by all the village.
- 2. We have been warned by both Suffolk Coastal and English Heritage that the curtilage of a listed manor is under the same protection as the house itself. So this should be an important consideration before granting permission for a building site immediately opposite. I enclose a photograph from our front windows which clearly demonstrates the total loss of our view of this 'special landscape area' not only a loss for us but for all Kirton residents.
- 3. The development of six houses in Struston Mead, beside our house, is also in the curtilage of the manor. However it was expressly designed to be in sympathy with the manor and screened by many mature trees. The proposed bungalows on the site opposite cannot be considered as all sympathetic to old buildings.
- 4. As you know, permission has already been given for approximately 50 houses on the B+M concrete site in Kirton. This more than fulfils Kirton's obligation under the current government policy to provide affordable housing. Further building would radically alter the character of our small village. Especially, more ribbon development along the verges of roads is nowadays discouraged. They inevitably obstruct any enjoyment of views of the countryside, which is designated a 'special landscape area'.
- 5. Since we understand that the proposed bungalows are destined for those with 'mobility issues' we are truly astonished that Kirton has been chosen for this venture. Kirton has not amenities such as village shops, post office, medical facilities etc. In fact one could say that the sole amenity in Kirton is the enjoyment of views of the countryside and protected endangered wildlife such as hares, hedgehogs and deer. Would not those with mobility issues not find Trimley or Felixstowe, with shops and medical facilities, more convenient and manageable?
- 6. Finally, in the light of these objections and despite the risk of being accused of 'nimbyism', we respectfully suggest on behalf of Kirton, that the Bucklesham Road building site be located elsewhere (perhaps Trimley or Felixstowe with plentiful amenities). Please do note the dangerous bend in the road beside this proposed site also.

Summary:

Permission has already been given for approximately 50 houses on the B+M concrete site in Kirton. This more than fulfils Kirton's obligation under the current government policy to provide affordable housing. Further building would radically alter the character of our small village. Especially, more ribbon development along the verges of roads is nowadays discouraged. They inevitably obstruct any enjoyment of views of the countryside, which is designated a 'special landscape area'.

Kirton has not amenities such as shops, post office, medical facilities etc. One could say that the sole amenity in Kirton is the enjoyment of views of the countryside.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Bucklesham Road, Kirton.pdf

O - 7578 - 3912 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7578 Object

Housing Preferred Policy FPP9: Land at Bucklesham Road,

Kirton

Respondent: Mrs Julie Durrant [3912] Agent: N/A

Full Text:

I write with response to the Parish Council Meeting held on Monday 23rd November 2015 and note your proposed draft letter to SCDC for which I thank you for your clarity on aspects included.

May I request that the following items are taken into consideration when offering your retort:

- 1. May I again reiterate the issue of bungalows. At the Public Meeting of27th January 2015, which primarily discussed the proposed Taylor Wimpey Site, the overall public opinion was that, were the TW Site to go ahead, bungalows would be preferably included with the dwellings to be built. It was not that bungalows were required within the village per se. This point seems to have been misinterpreted. As detailed by Mrs S Harvey, a count of current Bungalows (one storey only) within the village has been made and this numerates to over 100. This is a considerable ratio to houses considering there are approximately 550/600 dwellings in the village.
- 2. Special Landscape Area This Site is the last remaining SLA within the village and should be given consideration as such. Building on this site would obscure the view for all apart from those living in the newly built dwellings. As detailed overleaf [see attached document], any proposed development should not be 'detrimental to the character, spacing or density of a particular area'. This development would dramatically impact on the landscape, the surrounding areas, the enjoyment of villagers and visitors to the area, the environment and wildlife and would irreversibly change the aspect and character of this section of village. It would create a link between the dwellings at either end, which has purposely been afforded the greenfield separation to retain the villages characteristics and would infringe on the curtilage of The Manor, a listed and locally important building:
- 3. Drainage and Sewerage issues. We are all aware of the considerable problems and issues we have with both these areas. The sewerage is soon to be exacerbated by the inclusion of the TW Site and proposed housing allocations for Bucklesham will intensify the already overwhelmed and incompetent system. To encompass this new development, the complete hedge *and ditch boundary adjacent to Bucklesham Road will have to be removed, impacting an already inadequate drainage system and creating the opportunity for major flooding issues.
- 4. Traffic Traffic density within the village has increased considerably. This stretch of road is a busy route for many villagers and a cut through from Felixstowe to Woodbridge / Martlesham etc. This is aggravated by regular daily use by farm traffic, HGV's, buses, utilities vehicles etc. It is a narrow stretch of road and already causes difficulty for large vehicles attempting to pass one another. During the Spring, Summer and Autumn, the quantity of farm vehicles substantial in size and at times the width of the road increases in density, with many vehicles a day travelling back and forth. These are often working from sunrise to late into the evening, especially during harvest and it is already hazardous when driving, walking or cycling this route whilst these are being utilised. This stretch of road simply cannot absorb any further impact.
- 5. Environment Any development on this land will have a significant detrimental environmental effect. This land is surrounded by trees, substantial hedges and set aside/ arable farmland. We ourselves have an aged Oak Tree which lies on the boundary of this land and which hosts a considerable Bat Roost. The oak is of vast height, width and girth.

We are in the process of having both the tree and Bats surveyed and documented; the Bats are currently recorded with the Suffolk Biological Records Centre but are to be in-depthly surveyed early Spring so we have an concise record of species and quantity. We have been advised that the tree may be a Veteran due to its stature and wish for these both to be given exceptional consideration with regards to any proposed building works.

The hedgerows in this area are obviously of vital importance to many species, but are of necessity to the bats for feeding and navigation.

Please may I request my concerns are recorded in addition to previous submissions.

Summary:

This Site is the last remaining SLA within the village and should be given consideration as such. Building on this site would obscure the view for all apart from those living in the newly built dwellings. The sewerage is soon to be exacerbated by the inclusion of the TW Site and proposed housing allocations for Bucklesham will intensify the already overwhelmed and incompetent system.

Traffic density within the village has increased considerably. This stretch of road simply cannot absorb any further impact.

We are in the process of having both the tree and Bats surveyed and documented.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments: SLA Policy.pdf

C - 7618 - 2581 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7618 Comment

Housing

Preferred Policy FPP9: Land at Bucklesham Road, Kirton

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text:

Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

- * FPP4 Walton Field evaluation has identified an Early-Middle Bronze Age funerary landscape across the site, with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.
- * FPP6 Trimley Cropmarks on this site show that there are complex archaeological remains of pits, ditches and a coaxial field system and trackways of possible late prehistoric date (TYN 122). Archaeological remains are therefore known on the site, although they have not been fully characterised.

Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7618 - 2581 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7618 Comment

Housing

Preferred Policy FPP9: Land at Bucklesham Road, Kirton

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

Early Education

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The Government has indicated that it will legislate to double the number of hours' free childcare to 30. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

- In the Trimleys, developer contributions have already been secured to help manage the existing deficit in Early Years places and proposals are being drawn up to deliver additional places. Further development of the scale proposed (530 dwellings) will necessitate significant additional provision. Under current statutory arrangements, this would necessitate 53 additional places. When Land North of Walton High Street (400 dwellings) is included, the number of places required under current arrangements would increase to 93.

The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

- Development in the remainder of Felixstowe (150 dwellings North of Conway Close and 40 dwellings at Sea Road) can be managed by expanding existing settings.
- At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

The County Council would appreciate consideration of ways in which this policy could be more supportive of early education in retail centres, as part of a balanced policy which also protects the vitality and viability of retail centres. Policy FPP17 appears to implicitly support early education already, and discussion with the District Council may conclude that this policy is sufficient.

Primary Education

The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7618 - 2581 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7618 Comment

Housing

Preferred Policy FPP9: Land at Bucklesham Road, Kirton

[see table in attached document]

Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

Grange Primary School can also expand, though this school is also not well related to the proposed allocations or future directions of growth.

Paragraphs 37 and 38 of the National Planning Policy Framework reflect the need to minimise the length of journeys to school and, for major developments, primary schools should be located within walking distance of most properties.

The best long term solution would be to reserve 2.2ha land for a new 315-place primary school and early years setting in a location which is well related to housing growth. This would also enable provision to be made for future growth, with another school capable of expansion.

Options for reserving land for a new primary school include:

- Land within 'Land North of Walton High Street'
- Land within another one of the Trimley sites
- Land in another location in the Trimleys, well related to sustainable travel routes and the new housing.

Secondary and Sixth Form Education

Based on standard pupil multipliers, development of 1,135 dwellings would be expected to generate an additional 204 secondary school pupils and an additional 45 sixth formers.

Felixstowe and the Trimleys are served by Felixstowe Academy. Based on the forecast below, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from the development proposed in this Plan.

[see table in attached document]

All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

Health, Wellbeing and Social Care

A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

C - 7618 - 2581 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7618 Comment

Housing

Preferred Policy FPP9: Land at Bucklesham Road, Kirton

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

- * Ferry Road opposite site 502E
- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-

C - 7618 - 2581 - Preferred Policy FPP9: Land at Bucklesham Road, Kirton - None

7618 Comment

Housing

Preferred Policy FPP9: Land at Bucklesham Road, Kirton

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

-At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot Specified

Attachments:

Felixstowe Sites SW.pdf
Kirton Sites SW.pdf
Felixstowe Sites FZ.pdf
Kirton Sites FZ.pdf
2015-11-23 Felixstowe AAP_SCC Final Response.pdf

O - 6938 - 3234 - 4.01 - None

6938 Object

Employment 4.01

Respondent: Mrs Julie Cornforth [3234] Agent: N/A

Full Text: Business can operate, grow and expand.....unless you are firefighters. The full time firefighters have been cut and the

resort and nearby villages will be covered by 21 on-call officers day and night. (EADT 12/06/2014)

Summary: Business can operate, grow and expand....unless you are firefighters. The full time firefighters have been cut and the

resort and nearby villages will be covered by 21 on-call officers day and night. (EADT 12/06/2014)

Change to Plan What happens when you build all these 1800+ houses. Will someone just turn up at a house fire with a bucket of water

and pray!

False economy and dangerous!

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6949 - 3234 - 4.01 - None

6949 Object

4.01 **Employment**

N/A Respondent: Mrs Julie Cornforth [3234] Agent:

Full Text: EADT 07/03/2014

Growth plan could deliver 10,000 jobs

Ambitious plans for the creation of 10,000 jobs in East Suffolk by 2025 have been announced to provide a "sustainable

economy fit for the 21st Century"

The East Suffolk Growth Plan, produced in partnership by Suffolk Coastal and Waveney district councils, outlines

proposals to deliver employment and housing while also protecting the regions "precious countryside"

Andy Smith, deputy leader at SCDC said, "We want the Growth Plan to create a business environment which delivers jobs in a growing and sustainable economy fit for the 21st Century and the housing that is needed to sustain that.

Soundness Tests

Summary: "We want to do this in a way that sensitively looks after our precious countryside and coast, which makes east Suffolk a

uniquely attractive place to live, work and play"

Change to Plan What went wrong. Why do the powers that be seem to hate the Felixstowe Countryside with such a passion. (allegedly

Duty to Cooperate?

of course)

Legal?

Sound? Appear at exam? Not Specified Not Specified Not Specified Not Specified None

S - 6924 - 166 - 4.04 - None

6924 Support

Employment 4.04

Respondent: Mrs Carol Florey [166] Agent: N/A

Full Text: It is essential that the passenger rail service is maintained whilst extending the freight service as stated in the last

sentence. If we wish to develop business opportunities, encourage young families to the area and develop tourism the

passenger service must be supported and expanded.

Summary: It is essential that the passenger rail service is maintained whilst extending the freight service as stated in the last

sentence. If we wish to develop business opportunities, encourage young families to the area and develop tourism the

passenger service must be supported and expanded.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

C - 7096 - 3895 - 4.04 - None

7096 Comment

Employment 4.04

Respondent: Ms C.H Haniford [3895] Agent: N/A

Full Text:

Comments on the Felixstowe Peninsula Area Action Plan

Para 3.0 Housing 3.28 & 3.29 Air Quality. How necessary would it be to have business units here? It's quite close to the proposed Strategic Employment area. There could be a risk of further pollution from some activities. Why not create a small shopping area?

SHLAA ref 451g

3.31 Is this to be high density housing?

3.32 Candlet Road is already unable to cope with traffic in the morning & evening rush hours - how would you improve this situation by the additional traffic from the proposed development? Would you introduce a cycle route to the Strategic Employment Area?

3.35 Access for walkers should continue across Candlet Road - perhaps a pedestrian bridge would ease safety concerns.

3.36 Anglia Water have commented here and elsewhere on the pressure on their network - what is to be done about this?

page 28 3.40, 3.41, 3.44 Density on this proposed site appears to be greater than on the adjoining site i.e. you propose 150 dwellings and the adjacent area of a similar size contains 32 dwellings. How necessary is it to create such a high density development in this area?

& page 29 3.45 The access to this site could be problematic as Gulpher Road is narrow and rural with several awkward bends, which is quite manageable when it's quiet, however a major (potential) increase could create unnecessary pollution and vehicular hazards.

SHLAA Ref 502e Overall Assessment The site can hardly be described as "central". Nor is it particularly close to "key services", unless you have transport, good mobility or no children.

4.0 Employment 4.04 Regarding rail services: there appears to be a conflict of interests between the needs of passengers and those of the port (and its less polluting mode of transportation of their containers) - what is to be done? Better and more reliable links for passengers would benefit tourism from further afield as well as better access for local people wishing to use the trains for long distance travel.

5.0 Retail FPP 14 p.52 Shared Space scheme - has there been any evidence gathered on how this is working out? Are there any proposals to limit access at Weekends?

6.0 Tourism & Sea Front p.71 Car Parking - on the day of 'Art on the Prom' there were half empty car parks and overflowing pavements in nearby streets, such as Princes Road and Queens Road. This often happens when there is a big event on the prom.

Summarv:

Regarding rail services: there appears to be a conflict of interests between the needs of passengers and those of the port (and its less polluting mode of transportation of their containers) - what is to be done? Better and more reliable links for passengers would benefit tourism from further afield as well as better access for local people wishing to use the trains for long distance travel.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7596 - 3451 - 4.06 - None

7596 Comment

Employment 4.06

Respondent: Mr Michael Ninnmey [3451] Agent: N/A

Full Text:

In the previous response to the Consultation I requested whatever the "House Occupancy" was as E of E indicated back in 2004/5: which indicated that 50% of build was because less people in dwellings. What impact did 2008 crash have?

FPAAP

1.09

Sevenhill interchange suffers congestion already.

1.17

No reference to Health or wellbeing provision.

No reference on "Historic structures" A number at Risk.

2 02

No reference to Area pre- 1890 Walton has been erased!

2.10

By 2027! Children of many residents will have moved, because house building not meeting needs of local people, particularly low income young residents.

Para 3 Infrastructure Health & Sport. No proposal of provision.

2 11

The housing 1/4/2010 - 31/3/2015 has failed to deliver the agreed 106. Afford Housing.

FDD1

2010/13 1,003: no indication on map where? Misleading to 2027 land used.

EDD3

Alternative location for "open air market" visitor & tourist attraction.

Layout as Felix Multi plan?

Road facing Walton Hall: see Walton Green scheme:

- i) Retain rifle club, mitigate against noise on residents e.g acoustic barriers
- ii) Retain original coach house for Walton Hall!
- iii) HIDE NEW DEVELOPMENT BEHIND BOTH VALUED COMMUNITY ASSETS

FPP3 - 9

930 dwellings are to be added to rest of 1,003 plus windfall to access Felixstowe Port via jctn High road west/Garrison. This jctn has STANDING traffic back to HALF MOON Public hse NOW.

No mitigation shown on address this problem now a major concern in Walton - cum - Felixstowe is the Air Quality, (the H.R.W particularly has flood water through to the gravel.

Of increasing concern with VW rigging exhaust test.

Genera

- i) 106 agreement required provision of contribution to playspace and sports space: both of which are under provided. No indication as to how the C.I.L will make up for the shortfall and individual provision.
- ii) Community Hospital had 16 beds/no indication what extra to meet need of extra 5,000 people?
- iii) Map: fails to show position of the 1,003: The green lungs of Trimley St Martin, ST MARY, WALTON, OLD FELIXSTOWE at 2027 will only be PARKS & schools.
- iv) The buffer between settlements St Martin, ST MARY & WALTON gone.
- v) ECO-VILLAGE agreed in 2005 CS should be revised now or when 1,760 is reviewed.

4.06

The employment figures previously, have proved true?

How many "posts" are filled from outside FPAAP area? What will road traffic be by 2027? When the dual track completion date? Promise of a Ferry Quay to serve Harwich - Shotley - Felixstowe, ferry when?

No progress on supermarket provision?

No comment on underused land/council estate

Rail head in heart of Town H.R.W - Hamilton Rd, ST ANDREWS RD and GARRISON LANE.

Tourism

- i) Level footpath orwell to Deben fil in missing link of 300m? ASAP
- ii) Allow use of existing landing stages

Summary: The employment figures previously, have proved true?

How many "posts" are filled from outside FPAAP area? What will road traffic be by 2027? When the dual track completion date? Promise of a Ferry Quay to serve Harwich - Shotley - Felixstowe, ferry when?

No progress on supermarket provision?

No comment on underused land/council estste

C - 7596 - 3451 - 4.06 - None

7596 Comment

Employment 4.06

Rail head in heart of Town H.R.W - Hamilton Rd, ST ANDREWS RD and GARRISON LANE.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

M Ninnmey Comments.pdf

C - 6927 - 166 - Preferred Policy FPP10: Port of Felixstowe - None

6927 Comment

Employment Preferred Policy FPP10: Port of Felixstowe

Respondent: Mrs Carol Florey [166] Agent: N/A

Full Text: If we are to have any chance of attracting new business opportunities to Felixstowe as well as developing present ones,

the A14 must be upgraded, particularly the area where it is doubled with the A12 and even more specifically the Orwell Bridge. It is not a viable argument to be told we are lucky in comparison to the rest of the country as stated by a county

official. If we are serious about developing opportunities, this is a priority.

Summary: If we are to have any chance of attracting new business opportunities to Felixstowe as well as developing present ones,

the A14 must be upgraded, particularly the area where it is doubled with the A12 and even more specifically the Orwell Bridge. It is not a viable argument to be told we are lucky in comparison to the rest of the country as stated by a county

official. If we are serious about developing opportunities, this is a priority.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6940 - 3234 - Preferred Policy FPP10: Port of Felixstowe - None

6940 Object

Employment Preferred Policy FPP10: Port of Felixstowe

N/A Respondent: Mrs Julie Cornforth [3234] Agent:

Full Text: FADT 06/10/2015

Felixstowe port has prospered due to many factors: its unrivalled geographic location (opposite Rotterdam) a skilled and

flexible labour force (over 50% from Ipswich area) Ipswich's historic road and rail infrastructure and engineering

pedigree; plus brilliant and adaptable local trucking companies....

Clearly we must never become complacent, nor stop investing in its future, yet there are many causes for concern. When the Orwell Bridge opened in 1982 it was handling 300,000 TEUs of cargo; current estimates are at 3 million

TEUs, 10 times the volume.

Yet, 33 years later there have been few enhancements to our infrastructure. Despite the

Summary: sector and area's importance both regionally, nationally and internationally, the Port of Felixstowe is the ONLY major

North European container port not connected by a motorway.

Trucks from the new "London Gateway" can travel 110 miles on motorway to reach the mega distribution hubs in the Midlands, while from Fxt our trucks must travel 120 miles before reaching motorway, and then a further 25 miles to reach the same key destinations. Railfreight is arguably greener, but the truth is that extra rail capacity will reduce, not produce, more jobs here. Trucking companies will simply relocate to the midlands, reducing employment and income in

So, if you build all these house on the Fxt peninsula...what effect will it have on the A14 and the Golden Goose....the Change to Plan

Port of Felixstowe.

GRIDLOCK, as Councillor John Goodwin stated is not good!

Legal? **Duty to Cooperate? Soundness Tests** Appear at exam? Sound?

Not Specified Not Specified Not Specified Not Specified None

S - 7238 - 3364 - Preferred Policy FPP10: Port of Felixstowe - None

7238 Support

Employment Preferred Policy FPP10: Port of Felixstowe

Respondent: EDF Energy Networks Ltd (Diego Sanchez-Lopez) Agent: N/A

[3364]

Full Text: Site Allocations and Area Specific Policies - Preferred Options Consultation

Felixstowe Peninsula Area Action Plan

EDF Energy is one of the UK's largest energy companies with activities throughout the energy chain. Our interests include nuclear, coal and gas-fired electricity generation, renewables and energy supply to end users. We have over five million electricity and gas customer accounts in the UK, including residential and business users.

EDF Energy's interest in the Suffolk Coastal District relates to the Emergency Response Centre (off King George's Avenue, Leiston), the Sizewell B power station and the area north of Sizewell B, where there are proposals to construct and operate a new nuclear power station, known as Sizewell C, and other associated developments within Suffolk Coastal District to support its construction and operation.

Site Allocations and Area Specific Policies Previous Representations

In February 2014, EDF Energy submitted representations in respect of the Issues and Options version of the Site Allocations and Area Specific Policies Document ('Site Allocations Document'). These representations suggested to Suffolk Coastal District Council (the District Council) that the land necessary to construct and operate a potential nuclear power station at Sizewell C should be identified within the Site Allocations Document in order to both safeguard the land and assist relevant stakeholders in making more informed decisions on sites which may be affected by the proposals. EDF Energy also recommended that the District Council considers potential cumulative impacts when considering the suitability of sites for development and ensures that measures are adopted to safeguard existing and future development, particularly those of national importance.

Whilst we note the District Council's response to these representations, as set out in the Analysis of Responses to the Issues and Options Public Consultation (October 2015), we consider that the Sizewell C site should be referred to in the document, given its local and national importance under the key policy area (i.e. economy).

Policy Area - Economy

As explained within the document itself, the purpose of the Site Allocations Document is to 'provide the policies required to implement strategic policies in the Suffolk Coastal District Local Plan - Core Strategy and Development Management Policies July 2013' (pg. 11, para 1.13). Strategic Policy SP13 (Nuclear Energy) of the District Council's adopted Core Strategy acknowledges the possibility of additional nuclear power stations at Sizewell and sets out the local issues that should be addressed by such proposals.

Given that the District Council considers the possible development of additional nuclear power stations at Sizewell to be sufficiently important to justify the inclusion of a distinct Strategic Policy in the adopted Core Strategy, it would be reasonable to expect the Site Allocations Document to reflect and safeguard this policy within its allocations. National planning policy set out in the National Policy Statement for Nuclear Power Generation (EN-6), issued by the Department of Energy and Climate Change in July 2011, identifies the site at Sizewell as potentially suitable for new nuclear power station development, and should therefore be identified as a material consideration in the Site Allocations Document. This would enable such land to be safeguarded, whilst also assisting relevant stakeholders (e.g. communities, landowners and statutory consultees) in making more informed decisions on sites in the vicinity of those parcels of land which are identified, now and in the future, as being necessary to support the delivery of this national energy infrastructure.

Information detailing EDF Energy's proposals for Sizewell C is set out in the Sizewell C EIA Scoping Report (April 2014) which sought a Scoping Opinion from the Secretary of State, to inform the Environmental Impact Assessment being undertaken in support of the Project. As the District Council is aware, there will be further consultation with the general public and statutory bodies before any application for development consent is made. Any later versions of the Site Allocations Document should have regard to the latest proposals.

Policy Matters - General

EDF Energy accepts the need for further development within the district. However, should there be any proposals in proximity to the existing Sizewell B power station or Sizewell C site which may have an impact on the operational/emergency protocols of these power stations, the local authority should ensure that the relevant statutory stakeholders and landowners (including EDF Energy) are informed and have the opportunity to comment on any proposals.

We maintain our position that when considering the suitability of sites for development, the Council should consider the potential cumulative impacts (e.g. highway, community, local services, noise and air quality) of these developments on other sites and projects, in particular those of national importance, to ensure that measures are adopted to safeguard existing and future development.

Felixstowe Peninsula Area Action Plan

The Felixstowe Peninsula Area Action Plan (FPAAP) Preferred Options Consultation Document (October 2015) recognises that the Felixstowe Peninsula economy is dominated by the Port of Felixstowe, which is of strategic importance within the regional and national economies.

EDF Energy welcomes the Council's approach detailed in Preferred Policy FPP10 (Port of Felixstowe) which seeks to

S - 7238 - 3364 - Preferred Policy FPP10: Port of Felixstowe - None

7238 Support

Employment

Preferred Policy FPP10: Port of Felixstowe

protect and support the port, in recognition of the important function it plays in enabling the transport of goods to the existing Sizewell B power station by sea, as well as its potential to provide a transport route in support of a new power station at Sizewell C.

Taking Matters Forward

We trust that you will register the above representations accordingly. In the meantime, we would be grateful if you would keep us informed of any further consultations, progress on the Local Plan and any related planning documents.

Summary:

EDF Energy welcomes the Council's approach detailed in Preferred Policy FPP10 (Port of Felixstowe) which seeks to protect and support the port, in recognition of the important function it plays in enabling the transport of goods to the existing Sizewell B power station by sea, as well as its potential to provide a transport route in support of a new power station at Sizewell C.

Change to Plan N/A

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedN/A

S - 7282 - 3943 - Preferred Policy FPP10: Port of Felixstowe - None

7282 Support

Employment Preferred Policy FPP10: Port of Felixstowe

Respondent: The Exilarch's Foundation [3943] Agent: Pegasus Planning Group (Jamie Roberts) [3942]

Full Text:

I write to you on behalf of my client, the Exilarch's Foundation, to submit comments to the above consultation. The Exilarch's Foundation is a registered charity which funds educational projects in the UK and internationally; the Foundation has interests in the Anzani House site located on Trinity Avenue, Felixstowe.

We welcome the AAP's clear recognition within Section 4 - Employment of the Port of Felixstowe's economic importance, locally, regionally and nationally. We note that the AAP also highlights the role that surrounding port-related activities have in supporting the Port of Felixstowe and the benefits that are realised through the 'clustering' of similar uses. We therefore support the designation of the Strategic Employment Area which recognises the need for the clustering and intensification of port-related activity in a location which benefits from good infrastructure. We also support Policy FPP10: Port of Felixstowe which seeks to direct port-related development to the Strategic Employment Area including distribution and haulage uses.

We do however note that the haulage and distribution industry is a dynamic one which must be able to quickly adapt to the demands of international markets and technological change. As such, the need for operational flexibility is essential and this should be recognised either through the policy wording or supporting text.

We wish to specifically highlight the potential that the Anzani House site can play in securing the economic success of the Port and related businesses. The site could be suitably redeveloped to create a transportation depot which would complement existing uses and benefit from its position directly between the Port and the A14 trunk road. The site is large enough to provide a flexible depot with space to adapt to the rapidly-changing requirements of the distribution industry. However an additional option is the conversion of Anzani House into residential apartments, which would provide a convenient base particularly for workers within and around the Port.

I trust these submissions will be carefully considered through the plan preparation process and I look forward to being kept up to date with the progress of the Area Action Plan. If you have any queries or wish to discuss our submission further, please do not hesitate to contact me on the details below.

Summary:

We welcome the AAP's clear recognition within Section 4- Employment of the Port of Felixstowe's economic importance, locally, regionally and nationally. The AAP also highlights the role surrounding port-related activities have in supporting the Port and the benefits that are realised through the 'clustering' of similar uses. We therefore support the designation of the Strategic Employment Area which recognises the need for the clustering and intensification of port-related activity in a location which benefits from good infrastructure. We also support Policy FPP10: Port of Felixstowe which seeks to direct port-related development to the Strategic Employment Area including distribution and haulage.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

S - 7298 - 3843 - Preferred Policy FPP10: Port of Felixstowe - None

7298 Support

Full Text:

Employment Preferred Policy FPP10: Port of Felixstowe

Respondent: Felixstowe Chamber of Trade and Commerce

(Rachel Cronin) [3843]

RESPONSE OF FELIXSTOWE CHAMBER OF TRADE AND COMMERCE TO THE FELIXSTOWE PENINSULAR

N/A

AREA ACTION PLAN

FPP4

Felixstowe Chamber of Trade and Commerce supports development of new business units. Business units should consider light industrial and units for start-up businesses offering flexible terms.

Agent:

The Chamber would also support modem eco design to suit the local environment.

FPP10

Felixstowe Chamber agrees with the policy to promote and safeguard land for employment, whether it relates to Port activities or otherwise. The development of Uniserve may increase the variety of employment opportunities not Port related.

FPP11 & 12

The Chamber supports the use of these area for start-up premises.

FPP14

The Chamber would wish the focus to extend to professional services on the ground floor as well as retail. It is as important for members of the public to access financial and legal services at ground level, particularly for those with disabilities. Many residents will expect such services to be located in the town centre for ease of access.

The Chamber supports the extension of the shared space and the improved connection between the town centre and the tourist centre. Retail in Felixstowe should be seen and promoted as part of the tourist offer.

FPP15

Again, the Chamber would seek an amendment to include reference to professional services being incorporated on the ground floor.

FPP21

The Chamber of Commerce supports the use of properties on the Sea Road to be resort related. The Chamber is concerned that residential and resort uses may conflict, in particular for car parking provision.

The Chamber of Commerce also supports any proposals which provide a link between the sea front and town centre.

FPP23

The Chamber supports the careful development of visitor car parking. Car parking should provide a clear town map with estimated distances on foot to tourist locations. The Chamber would support a one-day roaming ticket allowing visitors to park in any car park on the peninsular to encourage visitors to stay for the day and to explore the range of attractions.

Summary:

Felixstowe Chamber agrees with the policy to promote and safeguard land for employment, whether it relates to Port activities or otherwise. The development of Uniserve may increase the variety of employment opportunities not Port related.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

C - 7337 - 348 - Preferred Policy FPP10: Port of Felixstowe - None

7337 Comment

Employment Preferred Policy FPP10: Port of Felixstowe

Respondent: Trinity College Cambridge [348] Agent: Bidwells (Mr Darren Cogman) [1138]

Full Text:

I write in response to the Preferred Options consultation, submitting representations on behalf of my client, Trinity College, Cambridge in respect of Employment Land, and in particular land at Christmasyards Wood, Felixstowe and Innocence Farm, Trimley St. Martin. I attach draft plans to indicate the site's locations. Both sites have previously been subject to discussions with, and technical representations to Suffolk Coastal District Council, Suffolk County Council, etc. as well as some engagement with the relevant Parish Councils.

Planning Context:

The Felixstowe AAP 'Preferred Options' consultation document acknowledges that the adopted Core Strategy (2013) Policy SP5 (Employment Land) considers employment land across the district and makes the distriction between Strategic Employment Areas and General Employment Areas.

The consultation document also acknowledges that employment opportunities across the Felixstowe Peninsula are dominated by the Port of Felixstowe. The New Anglia Strategic Economic Plan (2014) outlines that "Felixstowe is the UK's largest container port, handing 40% of the national container traffic. The Port employs over 2,700 people directly and a further 10,000 jobs are based in related industries." In recent years the Port has undergone significant expansion and investment which has seen improvement to the railway connections and further infrastructure investment continues to enable the Port to handle the latest mega-vessels.

The Core Strategy identifies the Port of Felixstowe as a Strategic Employment Area (SEA) given its contribution to the sub-regional, national and international economies, and states that those employed by the Port or Port related businesses represent 45% of the total workforce in the Felixstowe Area. Its significance is felt beyond the operations within the Port itself, with many businesses, and organisations relying upon the activities of the port for their own operations, such as shipping, logistics, distribution and transport companies.

In this context, the strategic importance of the Port of Felixstowe cannot be understated, with Core Strategy Policy SP5 (Employment Land) stating that the Council will make allocations of at least 8.5 hectares of new employment land within the district

Felixstowe AAP Preferred Policy FPP10: Port of Felixstowe identifies the SEA for the Port of Felixstowe (Policies Map), where land will be promoted and safeguarded for employment, activities and operations which support the retention, expansion and consolidation of the Port of Felixstowe and the jobs associated with the Port. It states that employment proposals which are considered to be of a strategic scale and nature, will be directed to sites within the Strategic Employment Area.

The supporting text to Policy FPP10 acknowledges the locational benefits of proximity to the SEA, and the aim, where possible, to intensify activities within the SEA.

Current Strategic Pressures:

The Port and Trinity's joint hinterland Estate remains under huge pressure, there having been no new green field employment land allocations for third party logistics since the 1990's. In this context Core Strategy Policy SP21 (Felixstowe with Walton and the Trimley Villages) acknowledges that "land is required for portrelated uses such as storage (including laden or un-laden containers) and distribution" (para. 4.38). It also acknowledges that "such land may need to be located away from the Port itself".

The presence of London Gateway, with its extensive distribution park hinterland (560 acres with the potential for 9.25m sq ft of warehousing) remains a potential game changing competitive threat.

The Launch of the 'Port of Felixstowe Logistics Park' initiative at the end of 2014 introduced the potential for some 1.45 million sq ft of warehousing over a 68 acre site within the SEA, but this requires the displacement of approximately 20 acres of long established third party haulage and yard based logistics providers, whose leases terminate in 2016, to sites outside the port estate.

This proposal for the construction of four new B8 distribution buildings, with ancillary office space and gatehouse buildings, provide a total of 83,411 sq.m (GIA) floorspace, and is currently subject to a planning application (Ref. DC/15/2576/FUL) that is expected to be determined (approved) by Suffolk Coastal District Council imminently. Many of the existing site users have unresolved relocation requirements and discussions on behalf of Trinity College have been opened with a view to seeing whether any of these can be accommodated within Trinity's Estate. At the same time, Trinity is also dealing with significant other unresolved accommodation requirements from both existing and new port related occupiers.

Proposed Employment Sites:

With the approval given for the B2/B8 Distribution Warehouse (Uniserve) at Clickett Hill Road, Trinity College has virtually no void space on its current hinterland distribution park and seeks to bring forward, as a matter of urgency, two sites; 27 acre net useable site at Christmasyards Wood, Felixstowe for single

occupancy; And, a 40 acre net useable site at Innocence Farm, Trimley St. Martin for multi occupancy. I attach plans to indicate the locations of these sites. Given the current level of unresolved premises, the number of enquiries received would utilise both of these allocations.

Land at Christmasyards Wood:

The proposed site is located off Fagbury Road West, Felixstowe and extends to approximately 12.71 hectares. As part of the previous promotion of this site, a number of preparatory technical studies were prepared in 2008/2009 to seek to demonstrate that development for a proposed container storage yard could be satisfactorily accommodated.

In acknowledging that the project amounted to 'EIA Development' by virtue of its significance, a Scoping Request was

C - 7337 - 348 - Preferred Policy FPP10: Port of Felixstowe - None

7337 Comment

Employment

Preferred Policy FPP10: Port of Felixstowe

made to Suffolk Coastal District Council, with the Scoping Opinion received on 3 December 2008. The proposed allocation would extend to approximately 27 acres for use by a single operator as a container storage/haulage yard with access from either Fagbury Road West, or Oysterbed Road.

Land at Innocence Farm:

The proposed site is located to the north of Trimley St. Martin and the A14. It is bounded by the A14 Felixstowe Road to the south and Croft Lane to the east (see attached location plan).

As part of the previous promotion of this site, a number of preparatory technical studies were prepared in 2008/2009 to seek to demonstrate that development for a strategic employment site as a next phase of the Trinity Distribution Park to service the Port of Felixstowe could be achieved at Innocence Farm.

An Engineering Assessment (for a developable area of approximately 85 hectares) appraised a range of matters to include access/egress to the site, on-site construction and earthworks, provision of service utilities, surface water drainage, landscaping measures to minimise/mitigate the impact of development, public rights of way and land ownership.

This report concluded that the site could be satisfactorily developed in principle.

Given the existing significant, commercial pressures from potential tenants, both new and displaced, the initial proposals seek an initial allocation (of approximately 40 acres) for multi-occupier use primarily for haulage and ancillary yard use, but also potentially some warehousing.

Conclusion

The Port of Felixstowe and Trinity's joint hinterland Estate remains under huge pressure to secure employment land, given that no greenfield employment land allocations for third party logistics have been secured since the 1990s. This position will be exacerbated by the Port of Felixstowe Logistics Park planning application that is expected to be approved imminently.

As the premier UK Port, Felixstowe is critically important to not only the Town but also the District, and region, in the context of the competitive threat from London Gateway.

Previous promotions and the associated technical work undertaken for the proposed employment sites at Christmasyards Wood and Innocence Farm has indicated that both can be delivered, and would address the unresolved premises enquiries experienced.

We trust that the above representations are of assistance in your consideration of Strategic Employment Area issues and look forward to discussing matters further as part of a collaborative partnership approach.

Summary:

As the premier UK Port, Felixstowe is critically important to not only the Town but also the District, and region, in the context of the competitive threat from London Gateway.

Previous promotions and the associated technical work undertaken for the proposed employment sites at Christmasyards Wood and Innocence Farm has indicated that both can be delivered, and would address the unresolved premises enquiries experienced.

We trust that the above representations are of assistance in your consideration of Strategic Employment Area issues and look forward to discussing matters further as part of a collaborative partnership approach.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Land at Christmasyard Wood and Innocence Farm.pdf

C - 7347 - 2516 - Preferred Policy FPP10: Port of Felixstowe - None

7347 Comment

Employment Preferred Policy FPP10: Port of Felixstowe

Respondent: Natural England (Sir/ Madam) [2516] Agent: N/A

Full Text: Planning consultation: Preferred Options Public Consultation

Site Allocations and Area Specific Policies; Felixstowe Peninsula Area Action Plan

Thank you for your consultation on the above which was received by Natural England on 19 October 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.

WILDLIFE AND COUNTRYSIDE ACT 1981 (AS AMENDED)
CONSERVATION OF HABITATS & SPECIES REGULATIONS 2010 (AS AMENDED)

Site Allocations and Area Specific Policies Development Plan Document

Preferred Options Consultation Document (October 2015)

Preferred Option Policy SSP1: New Housing Delivery 2015 - 2027

We note the requirement for new housing delivery to meet, as a minimum, the Core Strategy requirement for 7,900 homes over the period 2010 - 2027.

Preferred Option SSP3 - Land rear of Rose Hill, Saxmundham Road Aldeburgh

The policy allocates 3ha of land at this location for the provision of a care home plus ten residential units. The site is about 300m from Alde-Ore Estuary Special Protection Area (SPA)/Ramsar site and Alde-Ore and Butley Estuaries Special Area of Conservation (SAC). The avoidance of strategic housing proposals at Martlesham and at Felixstowe Peninsula within 1km of the Deben Estuary and

Orwell Estuary respectively has been proposed as mitigation in part for adverse effects arising from increased recreational disturbance. Preferred Option SSP3 is within 1km of the Alde-Ore Estuary and therefore we advise that it would be required to have a Habitats Regulations Assessment at the application stage.

The Preferred Option is within Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). We note the requirements for design to take account of the sensitive landscape context of the development and advise that a Landscape and Visual Assessment (LVIA) would be required at the application stage. In summary, further detailed information will be required to assess the environmental impact of the proposed policy at this location.

Preferred Option SSP18 Ransomes, Nacton Heath (around 30 hectares)

The potential development within the AONB has significant landscape and visual impacts. We note that potential mitigation is stated to include de-designation of AONB land, rationalising existing AONB boundary and/or high quality design of buildings, structures and setting to reduce landscape impacts and impacts on potential historic interests. We advise that the policy should not rely on the

boundary of the AONB being amended. For clarity, it is Natural England's statutory responsibility to determine the designation of AONBs or to review existing AONB boundaries. For further information, please see following a link to our Designations Strategy:

http://publications.naturalengland.org.uk/publication/2647412.

However, we support the proposal for a development brief to be prepared by the District Council toprovide detailed planning guidance for the whole area, covering both the former employment allocation and the AONB element to allow for a more flexible approach to be progressed.

Preferred Option SSP30 Visitor Management - Deben Estuary

We agree with the policy to prevent increased recreational disturbance of Deben Estuary by preventing any additional car parking provision within a 1km distance of the estuary and by requiring proposed improvements to existing access points which would result in an increased level of recreational activity on the estuary to demonstrate that they will not result in any "significant effect" either on their own or in combination with other uses.

Preferred Option SSP31 Snape Maltings (replaces policy AP166)

The policy promotes the use of Snape Maltings for arts, recreation, and tourism-related uses. Snape Maltings is within Suffolk Coast and Heaths AONB and is adjacent to Alde-Ore Estuary SPA/Ramsar site and Alde-Ore and Butley Estuaries SAC. Proposals at this location will be required to demonstrate that they will not have an adverse impact on the protected landscape and designated sites and may require a Habitats Regulations Assessment and/or LVIA at application stage.

Habitats Regulations Assessment

We agree with the screening exercise carried out by the HRA that Preferred Options SSP3 (Land rear of Rose Hill, Saxmundham Road Aldeburgh) and SSP31 (Snape Maltings) are likely to have a significant effect on internationally designated sites. We note that the HRA advises that a study of existing visitor disturbance to birds, looking at the amount and origin of visitor activity as well as the birds' response is required for the vicinity of Snape Maltings; we agree

C - 7347 - 2516 - Preferred Policy FPP10: Port of Felixstowe - None

7347 Comment

Employment

Preferred Policy FPP10: Port of Felixstowe

with the requirement for further evidence to inform a detailed assessment of this option.

We agree with the conclusion of the HRA (see section 5.1.1) which states that 'Site Allocation Document as a standalone document is likely to have a significant effect upon Alde-Ore Estuary European sites, with Preferred Policies SSP3 (land to the rear of Rose Hill, Saxmundham Road, Aldeburgh) and SSP31 (Snape Maltings) likely to have a significant effect by causing an increase in

disturbance to SPA-qualifying birds using the estuary'. However, we are unable to conclude no adverse effect on integrity of European sites from the subsequent statement that 'For both policies, further information and / or study might be able to inform a subsequent conclusion of no adverse effect upon the integrity of the European site' as this is not definite. We advise that either a rewording of the policies and/or further detailed assessment, including potential mitigation

measures, is required to enable us to have confidence in a conclusion of no adverse effect on integrity of European sites from these Preferred Options. We would be happy to give you further advice in this respect.

We support Preferred Option SSP30 (Visitor Management - Deben Estuary) regarding proposed improvements to access points such as slipways or jetties which may result in an increased level of recreational activity on the estuary needing to demonstrate that the proposal would not result in a likely significant effect on the notified features of the international site.

We note that the HRA states that mitigation for 'in combination' effects of new housing proposed in the Suffolk Coastal Core Strategy is being taken forward (section 3.3.3). In particular, we note that a Green Infrastructure plan is being considered by Suffolk Coastal District and Ipswich Borough to address the visitor management measures. In line with our current advice, we advise that this is not

sufficient to give confidence that the required mitigation measures will be delivered. There needs to be a commitment to having a mitigation strategy in place, informed by the green infrastructure plan, ideally by the time the plan is adopted or by a specified timescale shortly after the plan is adopted.

We advise this is necessary to give certainty that the mitigation measures will be delivered to ensure the plan is compliant with the Habitats Regulations and with paragraphs 113 and 118 of the NPPF.

We therefore suggest the following rewording:

'The Council will produce a mitigation strategy by {INSERT DATE} which will specify the measures required and how these will be delivered and funded'

Felixstowe Peninsula Area Action Plan

Preferred Options Consultation Document (October 2015)

Preferred Policy FPP1: Housing

We note that the Felixstowe Peninsula AAP identifies the requirement for 1,100 new dwellings on the preferred sites outlined in the document.

Preferred Policy FPP10: Port of Felixstowe

The policy promotes and safeguards land for employment, activities and operations which support the retention, expansion and consolidation of the Port of Felixstowe and the jobs associated with the Port. The expansion of the Port may have an impact on internationally designated sites. Please see our comments in Habitats Regulations Assessment below.

Preferred Policy FPP18: Felixstowe Ferry and Golf Course

We note that public access along the sea wall is to be retained within this area to ensure that sustainable links and connections are provided to maintain the unique character of the community and reduce the dominance of the motor car in this area. Please see our comments on England Coast Path below.

Preferred Policy FPP22: Martello Park to Landguard

We support the requirement for any future redevelopment of the port in this area to be carefully considered with the Landguard Partnership to ensure that the favourable condition of Landguard Common Site of Special Scientific Interest (SSSI) is maintained.

Preferred Policy FPP25: Access to the countryside

We support the policy which states that proposals which provide for the provision of green infrastructure in the Felixstowe Peninsula will be encouraged where these are well related to existing communities, offer good accessibility, connected to existing provision and provide alternative and accessible natural green space opportunities. We agree that proposals for new residential development in the Felixstowe Peninsula will be required to make provision of accessible natural green spaces as agreed by the District Council in conjunction with Natural England.

Habitats Regulations Assessment

We agree with the screening of the HRA which identified that Preferred Policy FPP10: (Port of Felixstowe) may have a likely significant effect on Stour and Orwell Estuaries SPA/Ramsar site as it stands. We agree with the conclusions of the HRA (see section 5.1.3) that the policy needs rewording to include a requirement for a Habitats Regulation Assessment to be provided in connection with proposals for expansion of Port of Felixstowe. We would be happy to give you

C - 7347 - 2516 - Preferred Policy FPP10: Port of Felixstowe - None

7347 Comment

Employment

Preferred Policy FPP10: Port of Felixstowe

further advice in this respect.

We note that the HRA states that mitigation for 'in combination' effects of new housing proposed in the Suffolk Coastal Core Strategy is being taken forward (section 3.3.3). Please see our comments for the Site Allocations and Area Specific Policies Development Plan Document HRA above.

England Coast Path

We would appreciate the opportunity to discuss the requirements of the England Coast Path (ECP) with you in order to ensure that the requirements of the Coast Path and any mitigation measures arising from it, are clearly distinguished from any mitigation that might be required from the Council's proposed allocations. For more information on ECP, please see our website as follows:

https://www.gov.uk/government/collections/england-coast-path-improving-public-access-to-thecoast.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

Summary:

The policy promotes and safeguards land for employment, activities and operations which support the retention, expansion and consolidation of the Port of Felixstowe and the jobs associated with the Port. The expansion of the Port may have an impact on internationally designated sites. We agree with the screening of the HRA which identified that Preferred Policy FPP10: (Port of

Felixstowe) may have a likely significant effect on Stour and Orwell Estuaries SPA/Ramsar site as it stands.

Change to Plan

We agree with the conclusions of the HRA (see section 5.1.3) that the policy needs

rewording to include a requirement for a Habitats Regulation Assessment to be provided in connection with proposals for expansion of Port of Felixstowe. We would be happy to give you further advice in this respect. We note that the HRA states that mitigation for 'in combination' effects of new housing proposed in

the Suffolk Coastal Core Strategy is being taken forward (section 3.3.3). In particular, we note that a Green Infrastructure plan is being considered by Suffolk Coastal District and Ipswich Borough to address the visitor management measures. In line with our current advice, we advise that this is not sufficient to give confidence that the required mitigation measures will be delivered. There needs to be a commitment to having a mitigation strategy in place, informed by the green infrastructure plan, ideally by the time the plan is adopted or by a specified timescale shortly after the plan is adopted.

We advise this is necessary to give certainty that the mitigation measures will be delivered to ensure the plan is compliant with the Habitats Regulations and with paragraphs 113 and 118 of the NPPF.

We therefore suggest the following rewording:

'The Council will produce a mitigation strategy by {INSERT DATE} which will specify the measures required and how these will be delivered and funded'

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

168976_168977 Preferred Options Consultation Felixstowe Peninsula AAP $_$ Site Specific Allocations_Redacted.pdf

C - 7388 - 3952 - Preferred Policy FPP10: Port of Felixstowe - None

7388 Comment

Employment Preferred Policy FPP10: Port of Felixstowe

Respondent: Anglian Water (Mr Stewart Patience) [3952] Agent: N/A

Full Text:

Thank you for the opportunity to comment on the Site Allocations and Area Policies Preferred Options Document and Felixstowe Peninsula Area Action Plan. Please find enclosed comments on behalf of Anglian Water.

Site Allocations and Area Specific Policies Preferred Options Consultation Document

Policy SSP3: Land rear of Rose Hill, Saxmundham Road Aldeburgh

Anglian Water has no objection to the proposed allocation of this site for open market housing and a care home.

Paragraph 2.28 (page 30)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.28 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP4: Land at Mill Road Badingham

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.32 (page 32)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.32 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP5: Land Adjacent to Corner Cottages, Main Road, Benhall

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP6: Land south of Brook Cottage, Benhall

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.35 (page 34)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.35 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP7: Land opposite Townsfield Cottages, Dennington

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.40 (page 37)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.40 should be amended to refer to the management of surface water run off in

C - 7388 - 3952 - Preferred Policy FPP10: Port of Felixstowe - None

7388 Comment

Employment

Preferred Policy FPP10: Port of Felixstowe

accordance with the surface water management hierarchy.

Policy SSP8: Land south of Ambleside, Main Road, Kelsale cum Carlton

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.46

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.46 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP9: Land north of Mill Close, Orford

It is expected that there may be a need for improvements to the sewerage treatment capacity to enable the development of this site.

Policy SSP10: Land west of Garden Square Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP10:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP11: Land rear of 3 -33 Suffolk Drive, Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP11:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP12: Land north-east of Street Farm

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP12:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP13: Land fronting Old Homes Road, Thorpeness

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP13:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP14: Land south of Lower Road Westerfield.

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP15: Land at Old Station Works, Main Road Westerfield

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP15:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP16: Land at Street Farm, Witnesham (Bridge)

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP17: Land south of the primary school, Witnesham

Anglian Water has no objection to the proposed allocation of this site for residential development.

C - 7388 - 3952 - Preferred Policy FPP10: Port of Felixstowe - None

7388 Comment

Employment

Preferred Policy FPP10: Port of Felixstowe

Policy SSP18: Ransomes, Nacton Heath

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP13:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP19: Land at Silverlace Green(former airfield) Parham

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required.

Therefore it is recommended that these issues are investigated further and Policy SSP19 is amended accordingly.

Policy SSP20: former airfield Parham

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required.

Therefore it is recommended that these issues are investigated further and Policy SSP20 is amended accordingly.

Policy SSP21: former airfield Debach

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required. Therefore it is recommended that these issues are investigated further and Policy SSP21 is amended accordingly.

Policy SSP22: Bentwaters Park, Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP22:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP23: Carlton Park, Main Road, Kelsale cum Carlton

Anglian Water has no objection to the proposed allocation of this site for employment development.

Policy SSP24: Levington Park, Levington

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP24:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP25: Riverside Industrial Estate, Border Cot Lane, Wickham Market

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP25:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP31: Snape Maltings

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site for arts, recreation and tourism related development. It is therefore suggested that the following text should be include in Policy SSP25:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Felixstowe Peninsula Area Action Plan Preferred Options Consultation document

Policy FPP3:Land at Sea Road, Felixstowe

C - 7388 - 3952 - Preferred Policy FPP10: Port of Felixstowe - None

7388 Comment

Employment

Preferred Policy FPP10: Port of Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP4: Land north of Walton High Street, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP5: Land north of Conway Close, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is therefore suggested that the following text should be include in Policy FPP6:

'Improving the capacity of the foul sewerage network'

Policy FPP7: Land off Howlett Way, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is therefore suggested that the following text should be include in Policy FPP7:

'Improving the capacity of the foul sewerage network'

Policy FPP8: Land off Thurmans Lane, Trimley St Mary

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP8:

'Improving the capacity of the foul sewerage network'

Policy FPP9: Land at Bucklesham Road, Kirton

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Policy FPP9 refers to 'reinforcement of connections'

The term reinforcements is normally used in the context of water mains and not foul sewers when referring to improvements within the network.

It is therefore suggested that the following text should be include in Policy FPP9:

'Improving the capacity of the foul sewerage network through reinforcement of connections by making necessary improvements to ensure that capacity can be made available'

Policy FPP10: Port of Felixstowe

It is noted that it proposed to allocate land at the Port of Felixstowe for strategic employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Policy FPP11: Land at Bridge Road, Felixstowe

It is noted that it proposed to allocate land at Bridge Road for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Policy FPP12: Land at Carr Road/Langer Road, Felixstowe

It is noted that it proposed to allocate land Carr Road/Langer Road for employment uses.

C - 7388 - 3952 - Preferred Policy FPP10: Port of Felixstowe - None

7388 Comment

Employment

Preferred Policy FPP10: Port of Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP12:

'Improving the capacity of the foul sewerage network'

Policy FPP13: Land at Haven Exchange, Felixstowe

It is noted that it proposed to allocate land at Haven Exchange for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP13:

'Improving the capacity of the foul sewerage network'

Summary: It is noted that it proposed to allocate land at the Port of Felixstowe for strategic employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this

site.

Change to Plan Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

S - 6928 - 166 - 4.12 - None

6928 Support

Employment 4.12

Respondent: Mrs Carol Florey [166] Agent: N/A

Full Text: I agree that not every use is appropriate at every location. This should also consider road access, such as roads like

Gulpher Road - a designated quiet lane!

Summary: I agree that not every use is appropriate at every location. This should also consider road access, such as roads like

Gulpher Road - a designated quiet lane!

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

S - 6921 - 3854 - 4.17 - None

6921 Support

Employment 4.17

Respondent: Mr Michael Florey [3854] Agent: N/A

Full Text: I agree with this and the road is in a very poor state of repair

Summary: I agree with this and the road is in a very poor state of repair

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

S - 6930 - 166 - 4.17 - None

6930 Support

Employment 4.17

Respondent: Mrs Carol Florey [166] Agent: N/A

Full Text: This is a useful and established business site which is seriously hampered by poor vehicle access generally.

Addressing this should be a priority

Summary: This is a useful and established business site which is seriously hampered by poor vehicle access generally.

Addressing this should be a priority

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

S - 7080 - 3892 - 4.17 - None

7080 Support

Employment 4.17

Respondent: Margaret Morris [3892] Agent: N/A

Full Text: FPP1

I have concerns about Housing adjacent to the A14 at Walton- a suggested bund in a planning application would not be

sufficient to protect residents and there needs to be safeguards written into the document.

I also have concerns about air quality fir this land north of High Street Walton.

3.31 - there is no reference to affordable housing, despite saying in the introduction that the Council is looking for Housing for Everyone. SCDC need to make a firm commitment to affordable - housing - and stick to it for a change.

4.17 I agree about the Bridge Road site

5.08 The changes to business rates for small businesses referred to in the Chancellor's Autumn Statement means I am

worried about the viability of the small businesses in the Town Centre.

Summary: I agree about the Bridge Road site

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

S - 7299 - 3843 - Preferred Policy FPP11: Land at Bridge Road, Felixstowe - None

7299 Support

Employment Preferred Policy FPP11: Land at Bridge Road,

Felixstowe

Respondent: Felixstowe Chamber of Trade and Commerce

(Rachel Cronin) [3843]

Agent: N/A

Full Text: RESPONSE OF FELIXSTOWE CHAMBER OF TRADE AND COMMERCE TO THE FELIXSTOWE PENINSULAR

AREA ACTION PLAN

FPP4

Felixstowe Chamber of Trade and Commerce supports development of new business units. Business units should consider light industrial and units for start-up businesses offering flexible terms.

The Chamber would also support modem eco design to suit the local environment.

FPP10

Felixstowe Chamber agrees with the policy to promote and safeguard land for employment, whether it relates to Port activities or otherwise. The development of Uniserve may increase the variety of employment opportunities not Port related.

FPP11 & 12

The Chamber supports the use of these area for start-up premises.

FPP14

The Chamber would wish the focus to extend to professional services on the ground floor as well as retail. It is as important for members of the public to access financial and legal services at ground level, particularly for those with disabilities. Many residents will expect such services to be located in the town centre for ease of access.

The Chamber supports the extension of the shared space and the improved connection between the town centre and the tourist centre. Retail in Felixstowe should be seen and promoted as part of the tourist offer.

FPP15

Again, the Chamber would seek an amendment to include reference to professional services being incorporated on the ground floor.

FPP21

The Chamber of Commerce supports the use of properties on the Sea Road to be resort related. The Chamber is concerned that residential and resort uses may conflict, in particular for car parking provision.

The Chamber of Commerce also supports any proposals which provide a link between the sea front and town centre.

FPP23

The Chamber supports the careful development of visitor car parking. Car parking should provide a clear town map with estimated distances on foot to tourist locations. The Chamber would support a one-day roaming ticket allowing visitors to park in any car park on the peninsular to encourage visitors to stay for the day and to explore the range of attractions.

Summary: The Chamber supports the use of these area for start-up premises.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

C - 7389 - 3952 - Preferred Policy FPP11: Land at Bridge Road, Felixstowe - None

7389 Comment

Employment Preferred Policy FPP11: Land at Bridge Road, Felixstowe

Respondent: Anglian Water (Mr Stewart Patience) [3952] Agent: N/A

Full Text:

Thank you for the opportunity to comment on the Site Allocations and Area Policies Preferred Options Document and Felixstowe Peninsula Area Action Plan. Please find enclosed comments on behalf of Anglian Water.

Site Allocations and Area Specific Policies Preferred Options Consultation Document

Policy SSP3: Land rear of Rose Hill, Saxmundham Road Aldeburgh

Anglian Water has no objection to the proposed allocation of this site for open market housing and a care home.

Paragraph 2.28 (page 30)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.28 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP4: Land at Mill Road Badingham

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.32 (page 32)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.32 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP5: Land Adjacent to Corner Cottages, Main Road, Benhall

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP6: Land south of Brook Cottage, Benhall

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.35 (page 34)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.35 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP7: Land opposite Townsfield Cottages, Dennington

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.40 (page 37)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.40 should be amended to refer to the management of surface water run off in

C - 7389 - 3952 - Preferred Policy FPP11: Land at Bridge Road, Felixstowe - None

7389 Comment

Employment

Preferred Policy FPP11: Land at Bridge Road, Felixstowe

accordance with the surface water management hierarchy.

Policy SSP8: Land south of Ambleside, Main Road, Kelsale cum Carlton

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.46

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.46 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP9: Land north of Mill Close, Orford

It is expected that there may be a need for improvements to the sewerage treatment capacity to enable the development of this site.

Policy SSP10: Land west of Garden Square Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP10:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP11: Land rear of 3 -33 Suffolk Drive, Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP11:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP12: Land north-east of Street Farm

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP12:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP13: Land fronting Old Homes Road, Thorpeness

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP13:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP14: Land south of Lower Road Westerfield.

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP15: Land at Old Station Works, Main Road Westerfield

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP15:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP16: Land at Street Farm, Witnesham (Bridge)

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP17: Land south of the primary school, Witnesham

Anglian Water has no objection to the proposed allocation of this site for residential development.

C - 7389 - 3952 - Preferred Policy FPP11: Land at Bridge Road, Felixstowe - None

7389 Comment

Employment

Preferred Policy FPP11: Land at Bridge Road, Felixstowe

Policy SSP18: Ransomes, Nacton Heath

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP13:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP19: Land at Silverlace Green(former airfield) Parham

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required.

Therefore it is recommended that these issues are investigated further and Policy SSP19 is amended accordingly.

Policy SSP20: former airfield Parham

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required.

Therefore it is recommended that these issues are investigated further and Policy SSP20 is amended accordingly.

Policy SSP21: former airfield Debach

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required. Therefore it is recommended that these issues are investigated further and Policy SSP21 is amended accordingly.

Policy SSP22: Bentwaters Park, Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP22:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP23: Carlton Park, Main Road, Kelsale cum Carlton

Anglian Water has no objection to the proposed allocation of this site for employment development.

Policy SSP24: Levington Park, Levington

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP24:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP25: Riverside Industrial Estate, Border Cot Lane, Wickham Market

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP25:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP31: Snape Maltings

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site for arts, recreation and tourism related development. It is therefore suggested that the following text should be include in Policy SSP25:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Felixstowe Peninsula Area Action Plan Preferred Options Consultation document

Policy FPP3:Land at Sea Road, Felixstowe

C - 7389 - 3952 - Preferred Policy FPP11: Land at Bridge Road, Felixstowe - None

7389 Comment

Employment

Preferred Policy FPP11: Land at Bridge Road, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP4: Land north of Walton High Street, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP5: Land north of Conway Close, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is therefore suggested that the following text should be include in Policy FPP6:

'Improving the capacity of the foul sewerage network'

Policy FPP7: Land off Howlett Way, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is therefore suggested that the following text should be include in Policy FPP7:

'Improving the capacity of the foul sewerage network'

Policy FPP8: Land off Thurmans Lane, Trimley St Mary

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP8:

'Improving the capacity of the foul sewerage network'

Policy FPP9: Land at Bucklesham Road, Kirton

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Policy FPP9 refers to 'reinforcement of connections'

The term reinforcements is normally used in the context of water mains and not foul sewers when referring to improvements within the network.

It is therefore suggested that the following text should be include in Policy FPP9:

'Improving the capacity of the foul sewerage network through reinforcement of connections by making necessary improvements to ensure that capacity can be made available'

Policy FPP10: Port of Felixstowe

It is noted that it proposed to allocate land at the Port of Felixstowe for strategic employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Policy FPP11: Land at Bridge Road, Felixstowe

It is noted that it proposed to allocate land at Bridge Road for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Policy FPP12: Land at Carr Road/Langer Road, Felixstowe

It is noted that it proposed to allocate land Carr Road/Langer Road for employment uses.

C - 7389 - 3952 - Preferred Policy FPP11: Land at Bridge Road, Felixstowe - None

7389 Comment

Employment

Preferred Policy FPP11: Land at Bridge Road, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP12:

'Improving the capacity of the foul sewerage network'

Policy FPP13: Land at Haven Exchange, Felixstowe

It is noted that it proposed to allocate land at Haven Exchange for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP13:

'Improving the capacity of the foul sewerage network'

Summary: It is noted that it proposed to allocate land at Bridge Road for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this

site.

Change to Plan Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

S - 7300 - 3843 - Preferred Policy FPP12: Land at Carr Road/Langer Road, Felixstowe - None

7300 Support

Employment Preferred Policy FPP12: Land at Carr Road/Langer

Road, Felixstowe

N/A

Respondent: Felixstowe Chamber of Trade and Commerce

(Rachel Cronin) [3843]

Full Text: RESPONSE OF FELIXSTOWE CHAMBER OF TRADE AND COMMERCE TO THE FELIXSTOWE PENINSULAR

AREA ACTION PLAN

FPP4

Felixstowe Chamber of Trade and Commerce supports development of new business units. Business units should consider light industrial and units for start-up businesses offering flexible terms.

Agent:

The Chamber would also support modem eco design to suit the local environment.

FPP10

Felixstowe Chamber agrees with the policy to promote and safeguard land for employment, whether it relates to Port activities or otherwise. The development of Uniserve may increase the variety of employment opportunities not Port related.

FPP11 & 12

The Chamber supports the use of these area for start-up premises.

FPP14

The Chamber would wish the focus to extend to professional services on the ground floor as well as retail. It is as important for members of the public to access financial and legal services at ground level, particularly for those with disabilities. Many residents will expect such services to be located in the town centre for ease of access.

The Chamber supports the extension of the shared space and the improved connection between the town centre and the tourist centre. Retail in Felixstowe should be seen and promoted as part of the tourist offer.

FPP15

Again, the Chamber would seek an amendment to include reference to professional services being incorporated on the ground floor.

FPP21

The Chamber of Commerce supports the use of properties on the Sea Road to be resort related. The Chamber is concerned that residential and resort uses may conflict, in particular for car parking provision.

The Chamber of Commerce also supports any proposals which provide a link between the sea front and town centre.

FPP23

The Chamber supports the careful development of visitor car parking. Car parking should provide a clear town map with estimated distances on foot to tourist locations. The Chamber would support a one-day roaming ticket allowing visitors to park in any car park on the peninsular to encourage visitors to stay for the day and to explore the range of attractions.

Summary: The Chamber supports the use of these area for start-up premises.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

C - 7390 - 3952 - Preferred Policy FPP12: Land at Carr Road/Langer Road, Felixstowe - None

7390 Comment

Employment Preferred Policy FPP12: Land at Carr Road/Langer Road. Felixstowe

Respondent: Anglian Water (Mr Stewart Patience) [3952] Agent: N/A

Full Text:

Thank you for the opportunity to comment on the Site Allocations and Area Policies Preferred Options Document and Felixstowe Peninsula Area Action Plan. Please find enclosed comments on behalf of Anglian Water.

Site Allocations and Area Specific Policies Preferred Options Consultation Document

Policy SSP3: Land rear of Rose Hill, Saxmundham Road Aldeburgh

Anglian Water has no objection to the proposed allocation of this site for open market housing and a care home.

Paragraph 2.28 (page 30)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.28 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP4: Land at Mill Road Badingham

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.32 (page 32)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.32 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP5: Land Adjacent to Corner Cottages, Main Road, Benhall

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP6: Land south of Brook Cottage, Benhall

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.35 (page 34)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.35 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP7: Land opposite Townsfield Cottages, Dennington

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.40 (page 37)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.40 should be amended to refer to the management of surface water run off in

C - 7390 - 3952 - Preferred Policy FPP12: Land at Carr Road/Langer Road, Felixstowe - None

7390 Comment

Employment

Preferred Policy FPP12: Land at Carr Road/Langer Road. Felixstowe

accordance with the surface water management hierarchy.

Policy SSP8: Land south of Ambleside, Main Road, Kelsale cum Carlton

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.46

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.46 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP9: Land north of Mill Close, Orford

It is expected that there may be a need for improvements to the sewerage treatment capacity to enable the development of this site.

Policy SSP10: Land west of Garden Square Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP10:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP11: Land rear of 3 -33 Suffolk Drive, Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP11:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP12: Land north-east of Street Farm

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP12:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP13: Land fronting Old Homes Road, Thorpeness

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP13:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP14: Land south of Lower Road Westerfield.

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP15: Land at Old Station Works, Main Road Westerfield

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP15:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP16: Land at Street Farm, Witnesham (Bridge)

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP17: Land south of the primary school, Witnesham

Anglian Water has no objection to the proposed allocation of this site for residential development.

C - 7390 - 3952 - Preferred Policy FPP12: Land at Carr Road/Langer Road, Felixstowe - None

7390 Comment

Employment

Preferred Policy FPP12: Land at Carr Road/Langer Road. Felixstowe

Policy SSP18: Ransomes, Nacton Heath

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP13:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP19: Land at Silverlace Green(former airfield) Parham

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required.

Therefore it is recommended that these issues are investigated further and Policy SSP19 is amended accordingly.

Policy SSP20: former airfield Parham

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required.

Therefore it is recommended that these issues are investigated further and Policy SSP20 is amended accordingly.

Policy SSP21: former airfield Debach

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required. Therefore it is recommended that these issues are investigated further and Policy SSP21 is amended accordingly.

Policy SSP22: Bentwaters Park, Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP22:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP23: Carlton Park, Main Road, Kelsale cum Carlton

Anglian Water has no objection to the proposed allocation of this site for employment development.

Policy SSP24: Levington Park, Levington

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP24:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP25: Riverside Industrial Estate, Border Cot Lane, Wickham Market

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP25:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP31: Snape Maltings

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site for arts, recreation and tourism related development. It is therefore suggested that the following text should be include in Policy SSP25:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Felixstowe Peninsula Area Action Plan Preferred Options Consultation document

Policy FPP3:Land at Sea Road, Felixstowe

C - 7390 - 3952 - Preferred Policy FPP12: Land at Carr Road/Langer Road, Felixstowe - None

7390 Comment

Employment

Preferred Policy FPP12: Land at Carr Road/Langer Road. Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP4: Land north of Walton High Street, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP5: Land north of Conway Close, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is therefore suggested that the following text should be include in Policy FPP6:

'Improving the capacity of the foul sewerage network'

Policy FPP7: Land off Howlett Way, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is therefore suggested that the following text should be include in Policy FPP7:

'Improving the capacity of the foul sewerage network'

Policy FPP8: Land off Thurmans Lane, Trimley St Mary

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP8:

'Improving the capacity of the foul sewerage network'

Policy FPP9: Land at Bucklesham Road, Kirton

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Policy FPP9 refers to 'reinforcement of connections'

The term reinforcements is normally used in the context of water mains and not foul sewers when referring to improvements within the network.

It is therefore suggested that the following text should be include in Policy FPP9:

'Improving the capacity of the foul sewerage network through reinforcement of connections by making necessary improvements to ensure that capacity can be made available'

Policy FPP10: Port of Felixstowe

It is noted that it proposed to allocate land at the Port of Felixstowe for strategic employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Policy FPP11: Land at Bridge Road, Felixstowe

It is noted that it proposed to allocate land at Bridge Road for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Policy FPP12: Land at Carr Road/Langer Road, Felixstowe

It is noted that it proposed to allocate land Carr Road/Langer Road for employment uses.

C - 7390 - 3952 - Preferred Policy FPP12: Land at Carr Road/Langer Road, Felixstowe - None

7390 Comment

Employment

Preferred Policy FPP12: Land at Carr Road/Langer Road, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP12:

'Improving the capacity of the foul sewerage network'

Policy FPP13: Land at Haven Exchange, Felixstowe

It is noted that it proposed to allocate land at Haven Exchange for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP13:

'Improving the capacity of the foul sewerage network'

Summary: It is noted that it proposed to allocate land Carr Road/Langer Road for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this

site.

Change to Plan Therefore it is suggested that the following text should be include in Policy FPP12:

'Improving the capacity of the foul sewerage network'

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 6637 - 2963 - Preferred Policy FPP13: Land at Haven Exchange, Felixstowe - None

6637 Comment

site.

Employment Preferred Policy FPP13: Land at Haven Exchange,

Felixstowe

Respondent: Suffolk Coastal District Council (SCDC Agent: N/A

Environmental Protection) [2963]

Full Text: I would like to comment, with regard to air quality, on the above Preferred Options Consultation as follows:

1) Felixstowe Peninsula Area Action Plan

* Land North of High Street, Walton - SHLAA Ref 451g Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this

* Land rear of Conway Close, Felixstowe - SHLAA Ref 502e Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

- * Land opposite Hand in Hand Public House, Trimley St. Martin SHLAA Ref 451b Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.
- * Land off Howlett Way, Trimely St. Martin SHLAA Ref 451d and 451c Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with both of these sites.
- * Land South of Thurmans Lane, Trimley St. Mary SHLAA Ref 383f and 451f Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with both of these sites.

* Employment

Land at Haven Exchange

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

- 2) Site Allocations & Area Specific Policies Development Plan Document
- * SSP10 Garden Square, Rendlesham

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* SSP11 - 3-33 Suffolk Drive, Rendlesham

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* SSP22 - Bentwaters Park, Rendlesham

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

* SSP 31 - Snape Maltings

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site.

Other comments

With regard to the Neighbourhood Plans for Woodbridge, Kesgrave and Leiston (and any others in the pipeline), we have particular concerns about developments with the potential to impact upon the volume and/or types of vehicular traffic at the Woodbridge Air Quality Management Area.

C - 6637 - 2963 - Preferred Policy FPP13: Land at Haven Exchange, Felixstowe - None

6637 Comment

Employment

Preferred Policy FPP13: Land at Haven Exchange, Felixstowe

It is sometimes difficult to convey to developers the importance of AQ impacts in respect of developments which may be, (by their own judgement) a significant distance from the Woodbridge AQMA; however, efforts to find ways of reducing the elevated levels of transport-related pollutants at this location to below the levels required by the EU Air Quality Directive (and UK regulations) have consistently failed to produce the required improvements in the 10 years or so since this AQMA was declared. This failure could result in financial penalties to the UK government from the EU. We are assured that any such penalties will be passed on to LAs with "failing" AQMAs in their districts. Consequently, we need to leave no stone un-turned in our examination of any proposed larger scale development (whether housing or otherwise) which has the potential to increase vehicle traffic at the existing Woodbridge Junction AQMA is consequently a matter of serious concern. Any such scheme must be accompanied by technical and robust modelling to predict the impact on traffic at this AQMA, accompanied by and assessment of the possible methods of mitigating those impacts.

The same general comments apply to some areas where our modelling/sampling indicates AQ thresholds are under pressure (but not yet breached) from transport-related sources.

Summary:

* Employment Land at Haven Exchange

Indicator Number 10 of the Sustainability appraisal (to maintain and where possible improve air quality) needs to be recorded as minor negative '-' and not neutral 'o' as there will be additional emissions from vehicles associated with this site

Change to Plan

Appear at exam?
Not Specified

Legal?

Sound?

Duty to Cooperate?

Soundness Tests

Not Specified Not Specified Non

S - 6923 - 3854 - Preferred Policy FPP13: Land at Haven Exchange, Felixstowe - None

6923 Support

Employment Preferred Policy FPP13: Land at Haven Exchange,

Felixstowe

Respondent: Mr Michael Florey [3854] Agent: N/A

Full Text: This is a perfect place for more business units, if required

Summary: This is a perfect place for more business units, if required

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

C - 7391 - 3952 - Preferred Policy FPP13: Land at Haven Exchange, Felixstowe - None

7391 Comment

Employment Preferred Policy FPP13: Land at Haven Exchange, Felixstowe

Respondent: Anglian Water (Mr Stewart Patience) [3952] Agent: N/A

Full Text:

Thank you for the opportunity to comment on the Site Allocations and Area Policies Preferred Options Document and Felixstowe Peninsula Area Action Plan. Please find enclosed comments on behalf of Anglian Water.

Site Allocations and Area Specific Policies Preferred Options Consultation Document

Policy SSP3: Land rear of Rose Hill, Saxmundham Road Aldeburgh

Anglian Water has no objection to the proposed allocation of this site for open market housing and a care home.

Paragraph 2.28 (page 30)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.28 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP4: Land at Mill Road Badingham

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.32 (page 32)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.32 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP5: Land Adjacent to Corner Cottages, Main Road, Benhall

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP6: Land south of Brook Cottage, Benhall

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.35 (page 34)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.35 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP7: Land opposite Townsfield Cottages, Dennington

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.40 (page 37)

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.40 should be amended to refer to the management of surface water run off in

C - 7391 - 3952 - Preferred Policy FPP13: Land at Haven Exchange, Felixstowe - None

7391 Comment

Employment

Preferred Policy FPP13: Land at Haven Exchange, Felixstowe

accordance with the surface water management hierarchy.

Policy SSP8: Land south of Ambleside, Main Road, Kelsale cum Carlton

Anglian Water has no objection to the proposed allocation of this site for residential development.

Paragraph 2.46

Reference is made to the need for the surface water network capacity being increased based upon comments previously made by Anglian Water. Connections should only be made to the surface water sewer network only where it has been demonstrated to the satisfaction of Anglian Water that suitable alternatives are not practicable. It is important to note that we would not accept a surface water connection to the foul (only) sewerage network under any circumstances.

Therefore it is suggested that para 2.46 should be amended to refer to the management of surface water run off in accordance with the surface water management hierarchy.

Policy SSP9: Land north of Mill Close, Orford

It is expected that there may be a need for improvements to the sewerage treatment capacity to enable the development of this site.

Policy SSP10: Land west of Garden Square Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP10:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP11: Land rear of 3 -33 Suffolk Drive, Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP11:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP12: Land north-east of Street Farm

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP12:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP13: Land fronting Old Homes Road, Thorpeness

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP13:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP14: Land south of Lower Road Westerfield.

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP15: Land at Old Station Works, Main Road Westerfield

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP15:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP16: Land at Street Farm, Witnesham (Bridge)

Anglian Water has no objection to the proposed allocation of this site for residential development.

Policy SSP17: Land south of the primary school, Witnesham

Anglian Water has no objection to the proposed allocation of this site for residential development.

C - 7391 - 3952 - Preferred Policy FPP13: Land at Haven Exchange, Felixstowe - None

7391 Comment

Employment

Preferred Policy FPP13: Land at Haven Exchange, Felixstowe

Policy SSP18: Ransomes, Nacton Heath

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP13:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP19: Land at Silverlace Green(former airfield) Parham

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required.

Therefore it is recommended that these issues are investigated further and Policy SSP19 is amended accordingly.

Policy SSP20: former airfield Parham

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required.

Therefore it is recommended that these issues are investigated further and Policy SSP20 is amended accordingly.

Policy SSP21: former airfield Debach

It is noted that it proposed to allocate land at the former airfield for employment uses.

This site is located some distance from the existing foul sewerage network and therefore it may not be viable to connect to the existing foul network and a new sewage treatment facility may be required. Therefore it is recommended that these issues are investigated further and Policy SSP21 is amended accordingly.

Policy SSP22: Bentwaters Park, Rendlesham

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP22:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP23: Carlton Park, Main Road, Kelsale cum Carlton

Anglian Water has no objection to the proposed allocation of this site for employment development.

Policy SSP24: Levington Park, Levington

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP24:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP25: Riverside Industrial Estate, Border Cot Lane, Wickham Market

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. It is therefore suggested that the following text should be include in Policy SSP25:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Policy SSP31: Snape Maltings

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site for arts, recreation and tourism related development. It is therefore suggested that the following text should be include in Policy SSP25:

'Need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available'

Felixstowe Peninsula Area Action Plan Preferred Options Consultation document

Policy FPP3:Land at Sea Road, Felixstowe

C - 7391 - 3952 - Preferred Policy FPP13: Land at Haven Exchange, Felixstowe - None

7391 Comment

Employment

Preferred Policy FPP13: Land at Haven Exchange, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP4: Land north of Walton High Street, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP5: Land north of Conway Close, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore we welcome the reference to the need to improve the capacity of the foul sewerage network.

Policy FPP6: Land opposite Hand in Hand Public House, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is therefore suggested that the following text should be include in Policy FPP6:

'Improving the capacity of the foul sewerage network'

Policy FPP7: Land off Howlett Way, Trimley St Martin

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is therefore suggested that the following text should be include in Policy FPP7:

'Improving the capacity of the foul sewerage network'

Policy FPP8: Land off Thurmans Lane, Trimley St Mary

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP8:

'Improving the capacity of the foul sewerage network'

Policy FPP9: Land at Bucklesham Road, Kirton

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Policy FPP9 refers to 'reinforcement of connections'

The term reinforcements is normally used in the context of water mains and not foul sewers when referring to improvements within the network.

It is therefore suggested that the following text should be include in Policy FPP9:

'Improving the capacity of the foul sewerage network through reinforcement of connections by making necessary improvements to ensure that capacity can be made available'

Policy FPP10: Port of Felixstowe

It is noted that it proposed to allocate land at the Port of Felixstowe for strategic employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Policy FPP11: Land at Bridge Road, Felixstowe

It is noted that it proposed to allocate land at Bridge Road for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP11:

'Improving the capacity of the foul sewerage network'

Policy FPP12: Land at Carr Road/Langer Road, Felixstowe

It is noted that it proposed to allocate land Carr Road/Langer Road for employment uses.

C - 7391 - 3952 - Preferred Policy FPP13: Land at Haven Exchange, Felixstowe - None

7391 Comment

Employment

Preferred Policy FPP13: Land at Haven Exchange, Felixstowe

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP12:

'Improving the capacity of the foul sewerage network'

Policy FPP13: Land at Haven Exchange, Felixstowe

It is noted that it proposed to allocate land at Haven Exchange for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this site. Therefore it is suggested that the following text should be include in Policy FPP13:

'Improving the capacity of the foul sewerage network'

Summary: It is noted that it proposed to allocate land at Haven Exchange for employment uses.

It is expected that there will be a need for improvements to the foul sewerage network to enable the development of this

site.

Change to Plan Therefore it is suggested that the following text should be include in Policy FPP13:

'Improving the capacity of the foul sewerage network'

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6925 - 3854 - 4.25 - None

6925 Object

Employment 4.25

Respondent: Mr Michael Florey [3854] Agent: N/A

Full Text: Whilst I agree that houses are needed, I strongly believe that this plot should be for housing only along the lines of

houses in Faulkeners way and Treetops/ Ascots drive (bungalows). I.E surrounding housing. Also please take into account that this is one of the first areas of Felixstowe visitor see. Therefore should be of a pleasant appearance.

Summary: Whilst I agree that houses are needed, I strongly believe that this plot should be for housing only along the lines of

houses in Faulkeners way and Treetops/ Ascots drive (bungalows). I.E surrounding housing. Also please take into account that this is one of the first areas of Felixstowe visitor see. Therefore should be of a pleasant appearance.

Change to Plan Business units should NOT be a part of this development. There are plenty of other locations around the dock area.

Anzani house for one, Haven exchange for another. A parade of shops along the lines of Faulkeners way would be

acceptable and maybe required.

Housing should be no more than 2 stories high as this is the highest point in the Felixstowe area.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6932 - 166 - 4.25 - None

6932 Object

Employment 4.25

Respondent: Mrs Carol Florey [166] Agent: N/A

Full Text: This land was not mentioned in the Local Plan for business use and as such should not now be introduced as an

option. The AAP is supposed to be fine tuning the LP not making unannounced additions,.

If 400 houses are proposed here, the site is not big enough for 'attractive business units' as well,unless you are planning to crowd houses together or build upwards. Those houses would also be far more effected by business unit

noise than by the A14 that they supposedly offer a buffer to.

What is 'attractive' anyway?

Summary: This land was not mentioned in the Local Plan for business use and as such should not now be introduced as an

option. The AAP is supposed to be fine tuning the LP not making unannounced additions,.

If 400 houses are proposed here, the site is not big enough for 'attractive business units' as well,unless you are planning to crowd houses together or build upwards. Those houses would also be far more effected by business unit

noise than by the A14 that they supposedly offer a buffer to.

What is 'attractive' anyway?

Change to Plan 1. Remove the 'attractive business unit' option from this site.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

S - 6934 - 3854 - 4.25 - None

6934 Support

Employment 4.25

Respondent: Mr Michael Florey [3854] Agent: N/A

Full Text: I support this on proviso that it includes open space and housing that is not too compact and purely for housing no more

than 2 stories high.

Summary: I support this on proviso that it includes open space and housing that is not too compact and purely for housing no more

than 2 stories high.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

S - 6933 - 166 - 5.02 - None

6933 Support

Retail 5.02

Respondent: Mrs Carol Florey [166] Agent: N/A

Full Text: The vitality and viability of Felixstowe Town Centre is crucial and should form the foundation of any planning decisions

made regarding out of town centre developments

Summary: The vitality and viability of Felixstowe Town Centre is crucial and should form the foundation of any planning decisions

made regarding out of town centre developments

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

C - 6989 - 3872 - 5.03 - None

6989 Comment

Retail 5.03

Respondent: Mr Howard Price [3872] Agent: N/A

Full Text: Overall vacancies may be low but this paragraph fails to note the number of 'charity' shops or the slow rate of re-

occupation of vacated units, both indications of a fragile local retail economy which the encouragement of future growth could only damage further. In no case is this more potentially damaging than in that of supermarkets, the evidently low footfall in which should speak for itself, ie that any additional provision will not produce healthy competition but will

simply destroy current choice.

Summary: Overall vacancies may be low but this paragraph fails to note the number of 'charity' shops or the slow rate of re-

occupation of vacated units, both indications of a fragile local retail economy which the encouragement of future growth could only damage further. In no case is this more potentially damaging than in that of supermarkets, the evidently low footfall in which should speak for itself, ie that any additional provision will not produce healthy competition but will

simply destroy current choice.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6770 - 3060 - 5.06 - None

6770 Comment

Retail 5.06

Respondent: Felixstowe Town Council (Mr Ash Tadjrishi) [3060] Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Preferred Options Consultation

Thank you for the opportunity to respond to the Suffolk Coastal District Council Felixstowe Peninsula Area Action Plan Preferred Options paper. The Town Council considered this matter at its meeting of 11 November 2015.

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Page 27, FPP4

Remove "and Candlet Road" from the first bullet point. Any business units for this site should be restricted to the land adjacent to the A14 Dock Spur only.

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The title should read "Land" rather than "Lane" and include Swallow Close.

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Please include Swallow Close and refer to this site as the "Land north of Conway Close and Swallow Close" throughout.

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Given the latest available information on these sites, this paragraph should be removed.

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C - 6770 - 3060 - 5.06 - None

6770 Comment

Retail 5.06

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Appendix 7:Felixstowe, Trimley St. Mary & Trimley St. Martin Inset Map.

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The port area should be included within the Physical Limits boundary as is the case in the 2001 Local Plan map. The Physical Limits boundary in the Manor End area should include the caravan parks and Custom House, terminating at the boundary of Landguard Common.

The colouring of some of the designations on the main map are confusingly similar, notably those for the Proposed District Centre, the District Centre boundary and the revised Physical Limits boundary. Also, the use of very heavy lines at the scale of the main map is unhelpful.

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Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

AAP Preferred Options Consultation Response.pdf

O - 6935 - 166 - 5.06 - None

6935 Object

Retail 5.06

Respondent: Mrs Carol Florey [166] Agent: N/A

Full Text: An independent retail assessment completed in 2014 at great expense clearly stated that only one superstore should be

allowed in Felixstowe in order to protect the vitality and viability of the town centre. Permission has now been granted by our town council for two, in direct opposition to this recommendation. It would now seem that neither is going to

proceed, giving our council a chance to rectify this in the future.

Summary: An independent retail assessment completed in 2014 at great expense clearly stated that only one superstore should be

allowed in Felixstowe in order to protect the vitality and viability of the town centre. Permission has now been granted by our town council for two, in direct opposition to this recommendation. It would now seem that neither is going to

proceed, giving our council a chance to rectify this in the future.

Change to Plan 1. Only one new superstore to be allowed in or around Felixstowe town centre in line with the independant retail

assessment

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6771 - 3060 - 5.08 - None

6771 Comment

Retail 5.08

Respondent: Felixstowe Town Council (Mr Ash Tadjrishi) [3060] Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Preferred Options Consultation

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This should be titled FPP27 rather than FP27.

C - 6771 - 3060 - 5.08 - None

6771 Comment

Retail 5.08

Please revise the first line of text to read "Spa Gardens and Town Hall Gardens".

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Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

AAP Preferred Options Consultation Response.pdf

C - 7081 - 3892 - 5.08 - None

7081 Comment

Retail 5.08

Respondent: Margaret Morris [3892] Agent: N/A

Full Text: FPP1

I have concerns about Housing adjacent to the A14 at Walton- a suggested bund in a planning application would not be

sufficient to protect residents and there needs to be safeguards written into the document.

I also have concerns about air quality fir this land north of High Street Walton.

3.31 - there is no reference to affordable housing, despite saying in the introduction that the Council is looking for Housing for Everyone. SCDC need to make a firm commitment to affordable - housing - and stick to it for a change.

4.17 I agree about the Bridge Road site

5.08 The changes to business rates for small businesses referred to in the Chancellor's Autumn Statement means I am

worried about the viability of the small businesses in the Town Centre.

Summary: The changes to business rates for small businesses referred to in the Chancellor's Autumn Statement means I am

worried about the viability of the small businesses in the Town Centre.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6772 - 3060 - 5.10 - None

6772 Comment

Retail 5.10

Respondent: Felixstowe Town Council (Mr Ash Tadjrishi) [3060] Agent: N/A

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C - 6772 - 3060 - 5.10 - None

6772 Comment

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Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

AAP Preferred Options Consultation Response.pdf

C - 6733 - 3782 - 5.11 - None

6733 Comment

Retail 5.11

Respondent: Mary Wyatt [3782] Agent: N/A

Full Text: Please note that many shops can only be serviced from Hamilton Road itself. They do not have back access.

Therefore the 'no loading' signs in Hamilton Road Shared Space area are inappropriate.

It is important to maintain access via Hamilton Road for servicing of shops.

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Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6735 - 3782 - 5.11 - None

6735 Comment

Retail 5.11

Respondent: Mary Wyatt [3782] Agent: N/A

Full Text: Servicing access to some shops between Boots and Orwell Road is only from Hamilton Road. Therefore the 'no

loading' signs are inappropriate.

It is important to make sure access and exit routes for delivery lorries do not take residential roads.

Summary: Servicing access to some shops between Boots and Orwell Road is only from Hamilton Road. Therefore the 'no

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Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6773 - 3060 - 5.12 - None

6773 Comment

Retail 5.12

Respondent: Felixstowe Town Council (Mr Ash Tadjrishi) [3060] Agent: N/A

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C - 6773 - 3060 - 5.12 - None

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Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

AAP Preferred Options Consultation Response.pdf

C - 7513 - 4029 - 5.12 - None

7513 Comment

Retail 5.12

Respondent: Mrs Y Smart [4029] Agent: N/A

Full Text:

Although I am interested in all areas of the above for this survey I concern myself in the main to the Trimleys.

I recognise the need for more housing in the area and looking at the report I do not object to the proposed preferred sites for residential development. However I make the following comments.

- As far as I can see there is no mention of school or health centre capacity being addressed.
- Provided open space as set out in report are included in developments then this should meet the needs of residents as such areas are an important aspect of residents well-being (with a knock on effect on health care needs being reduced)
- A decent allocation of one and two bed housing must be available to purchase (not just rent via Housing Assoc). There is a serious shortage of such housing for people to buy and actually live in themselves. Good balance of both needs required. NOTE The mushroom farm development has no 1/2 bed properties to purchase.
- Any buildings of architectural interest throughout the Peninsula must be retained. Such buildings are an important aspect of our heritage as well as a tourist attraction. Any 'lost' due to development is detrimental to the area.
- Shared spaces in Felixstowe I do not agree with extending area to Bent Hill will be of any benefit. The current area leaves much to be desired, especially to the hard of hearing as well as the blind / partially sighted
- I understand T.I.C. is to be reinstated on the seafront in a beach hut. An improvement to original location in the library.
- I am led to believe that there are no Councillors representing Felixstowe on Planning Committee. If this is correct then it is a sorry state of affairs that there is not one Councillor who has the necessary training to serve on such an important Committee.

Summary:

- Shared spaces in Felixstowe - I do not agree with extending area to Bent Hill will be of any benefit. The current area leaves much to be desired, especially to the hard of hearing as well as the blind / partially sighted

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 6739 - 3782 - Preferred Policy FPP14: Felixstowe Town Centre - None

6739 Object

Retail Preferred Policy FPP14: Felixstowe Town Centre

Respondent: Mary Wyatt [3782] Agent: N/A

Full Text: Delivery lorry movements should be studied. There is no overall understanding of how these work. An understanding

and plan for lorry movements is essential to the successful working of the town.

Summary: Delivery lorry movements should be studied. There is no overall understanding of how these work. An understanding

and plan for lorry movements is essential to the successful working of the town.

(Ranelagh Road and Orwell Road) as access/exit routes.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6888 - 3785 - Preferred Policy FPP14: Felixstowe Town Centre - None

6888 Comment

Retail Preferred Policy FPP14: Felixstowe Town Centre

Respondent: Stephen Wyatt [3785] Agent: N/A

Full Text: Please note that some shops in Hamilton road can only be accessed via Hamilton Road for deliveries. It is important

that all delivery lorries should be directed to enter and access avoiding residential streets wherever possible.

Summary: Please note that some shops in Hamilton road can only be accessed via Hamilton Road for deliveries. It is important

that all delivery lorries should be directed to enter and access avoiding residential streets wherever possible.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified Non

C - 7097 - 3895 - Preferred Policy FPP14: Felixstowe Town Centre - None

7097 Comment

Retail Preferred Policy FPP14: Felixstowe Town Centre

Respondent: Ms C.H Haniford [3895] Agent: N/A

Full Text:

Comments on the Felixstowe Peninsula Area Action Plan

Para 3.0 Housing 3.28 & 3.29 Air Quality. How necessary would it be to have business units here? It's quite close to the proposed Strategic Employment area. There could be a risk of further pollution from some activities. Why not create a small shopping area?

SHLAA ref 451g

3.31 Is this to be high density housing?

3.32 Candlet Road is already unable to cope with traffic in the morning & evening rush hours - how would you improve this situation by the additional traffic from the proposed development? Would you introduce a cycle route to the Strategic Employment Area?

3.35 Access for walkers should continue across Candlet Road - perhaps a pedestrian bridge would ease safety concerns.

3.36 Anglia Water have commented here and elsewhere on the pressure on their network - what is to be done about this?

page 28 3.40, 3.41, 3.44 Density on this proposed site appears to be greater than on the adjoining site i.e. you propose 150 dwellings and the adjacent area of a similar size contains 32 dwellings. How necessary is it to create such a high density development in this area?

& page 29 3.45 The access to this site could be problematic as Gulpher Road is narrow and rural with several awkward bends, which is quite manageable when it's quiet, however a major (potential) increase could create unnecessary pollution and vehicular hazards.

SHLAA Ref 502e Overall Assessment The site can hardly be described as "central". Nor is it particularly close to "key services", unless you have transport, good mobility or no children.

4.0 Employment 4.04 Regarding rail services: there appears to be a conflict of interests between the needs of passengers and those of the port (and its less polluting mode of transportation of their containers) - what is to be done? Better and more reliable links for passengers would benefit tourism from further afield as well as better access for local people wishing to use the trains for long distance travel.

5.0 Retail FPP 14 p.52 Shared Space scheme - has there been any evidence gathered on how this is working out? Are there any proposals to limit access at Weekends?

6.0 Tourism & Sea Front p.71 Car Parking - on the day of 'Art on the Prom' there were half empty car parks and overflowing pavements in nearby streets, such as Princes Road and Queens Road. This often happens when there is a big event on the prom.

Summarv:

Shared Space scheme - has there been any evidence gathered on how this is working out? Are there any proposals to limit access at Weekends?

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7144 - 744 - Preferred Policy FPP14: Felixstowe Town Centre - None

7144 Comment

Retail Preferred Policy FPP14: Felixstowe Town Centre

Respondent: Historic England (Sir/ Madam) [744] Agent: N/A

Full Text: Re: Preferred Options Public Consultation (19th October - 30th November 2015)

Felixstowe Peninsula Area Action Plan

Thank you for your letter dated 15th October 2015 regarding the above consultation. We have had the opportunity to assess the letter and consultation documents and can offer the following. Please note we have provided comments on the Site Allocations and Area Specific Policies within a separate letter to you dated the same. This follows a previous consultation and our comments dated 25th February 2015.

In terms of our general comments:

Recent Guidance from Historic England

We have recently published guidance on the Historic Environment and Site Allocations. Where we have not made comment below some additional guidance on ensuring a positive strategy for the historic environment is secured within the Felixstowe Area Action Plan can be seen by following this link- http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/.

In terms of our site specific comments:

Housing Sites

FPP4: Land north of Walton High Street, Felixstowe (451g)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the possible impact on the setting of two Listed Buildings, Grade II* Listed Walton Hall and Grade II Listed 362 High Street. We highlighted that the principal elevation of Walton Hall faces north and overlooks site 451g. It was considered that development here would urbanise the setting of this important, highly designated heritage asset, resulting in harm to its significance. It was expressed that harm would also be caused to the Grade II lodge and we strongly advised that an alternative site was found for development, though it was thought that there may be scope for some limited development at the eastern end of this site. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. The policy does however highlight that the development will need to be sympathetic to the Listed Buildings found at Walton Hall and 362 High Street. Whilst this would go some way to allay our concerns we still recommend that whilst it is considered the site can take a level of development there would be a detrimental harm to the setting of the Listed Buildings if the whole site is developed. If the site is to remain in the plan we would advise that the western end of the site is left relatively undeveloped to help protect the setting and it is considered that this side of the site might lend itself to fulfil the Public Open Space requirement.

FFP5: Land north of Conway Close, Felixstowe (502e)

We welcome the acknowledgment of the Listed Buildings and the requirement that development will need to be sympathetic to the Listed Buildings within the policy. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FFP6: Land opposite Hand in Hand Public House, Trimley St Martin (451b)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of two Grade II Listed Buildings (the Hand in Hand public house and Nos 251 and 253 High Road). We highlighted that both these buildings are traditional vernacular structures that date back to the agrarian origins of the village, and their current proximity to open countryside contributes to their setting and significance. We therefore encouraged the Local Planning Authority to identify alternative sites if at all possible so that the setting of these two buildings might be protected. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. However, it is also acknowledged that the policy requires a village green to be included within the scheme. The village green is to front High Road in order to reduce the impact on the setting of the Hand in Hand public house and this is particularly welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP7: Land off Howlett Way, Trimley St Martin (451c and 451d)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of the two Grade II listed churches and the Grade II listed Old Rectory. Whilst it is acknowledged that the consideration of the setting of the rectory is included within the policy, and this is welcomed, we would advise that the setting of the churches is also included. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP8: Land off Thurmans Lane, Trimley St Mary (383f and 451f)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of Grade II Listed Building Mill Farmhouse. It is acknowledged that there is a requirement in the policy that the development will need to be sympathetic to the setting of the mill and this is welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

Town Centre

FFP14: Felixstowe Town Centre and FFP15: Retail Frontages

As outlined within our response to you dated 25th February 2015 it is considered these policies should cover

C - 7144 - 744 - Preferred Policy FPP14: Felixstowe Town Centre - None

7144 Comment

Retail

Preferred Policy FPP14: Felixstowe Town Centre

conservation and design issues. It is considered the policies should highlight the importance of retaining or restoring historic shopfront features both in terms of the positive contribution historic shopfronts make to the character of an area but also the economic benefit of providing traditional and bespoke shopping units to shopowners. A good example of how historic shopfronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a National success. The council have also seen a ripple effect of surrounding properties being restored. As well as including conservation and design issues within these policies the Council could consider additional advice within a Supplementary Planning Guide on Historic Shopfronts, especially given the importance and contribution the Historic shopping areas within the settlements of Suffolk make to the wider area.

District Centres

FPP17: District Centres

As above it is considered that this policy should cover conservation and design issues. It should highlight the contribution the Historic Environment makes to the economic success of district centres and seek to protect and enhance both the setting of historic assets and assets themselves.

Tourism and Sea Front Activities

We welcome the inclusion of a section which covers tourism and seafront activities. It is considered that point 6.03 on page 61 could also acknowledge and highlight the wider and more general positive contribution to Felixstowe that heritage tourism brings.

FFP18: Felixstowe Ferry and Golf Course, FFP19: Felixstowe Ferry Golf Club to Cobbolds Point, FPP20: Cobbolds Point to Spa, FPP21: Spa to Martello Park and FFP22 Martello Park to Landguard We welcome and support the acknowledgement and required protection of the historic qualities of these sections of the coast.

FPP23: Car Parking

We welcome the 'high quality of design' requirement relating to replacement car parking at point 6.36 on page 72. It is considered that this requirement should be included within the policy itself to give it more weight in decision making.

The Environment

We welcome the inclusion of a section on the Historic Environment which sits separately from landscape and ecological elements. We also welcome the section on Locally Listed Buildings and Features. It is considered the Historic Environment section should also highlight Felixstowe's archaeology.

It is acknowledged that no individual policies on the Historic Environment are proposed for the Area Action Plan itself, relying instead on saved policies within the Core Strategy and the National Planning Policy Framework. The Core Strategy does not have a specific historic environment policy, with certain aspects covered in other policies such as SP15 (Landscape and Townscape) and DM21 (Design Aesthetics) and policies for specific settlements. It is considered that there is a lack of a clear strategy relating to the Historic Environment, relating to local issues, at present, and we would encourage greater clarity. This should set out the Council's approach to the management of designated and non-designated heritage assets (including archaeology) and how issues such as heritage at risk will be tackled. It is considered that a Historic Environment Policy could be locally specific to cover the Felixstowe Peninsula Area Action Plan.

In addition to the above it is acknowledged that the issue of Felixstowe South Conservation Area At Risk is not being covered by the Plan. We therefore reiterate our previous comments as follows, it would be advantageous if the Area Action Plan identified specific policies to help remove it from the register. These might include utilising the conservation area appraisal to identify locally important buildings that contribute positively to the conservation area, and introduction Article 4 directives to protect such buildings. There may also be sites which are considered negative contributors to the character and appearance of the conservation area and the preparation of development briefs for such sites might help bring forward positive redevelopment. The conservation area survey identified the loss of architectural detail as a significant problem, and consideration might therefore be given to applying to the Heritage Lottery Fund for a Townscape Heritage programme for the area, or a smaller partnership scheme with Historic England to reinstate lost architectural details on key buildings. We would therefore still recommend the inclusion of a policy which tackles the issues at Felixstowe South Conservation Area.

FPP26: Areas to be Protected from Development

In our response to you dated 25th February 2015 we expressed concerns regard the inclusion of all the sites in Trimley St Martin which would in effect surround a number of Listed Buildings including Grade II listed churches, the Grade II listed Old Rectory and Grade II Listed Building Mill Farmhouse. We recommended the inclusion of an area to be protected from development which would protect the remaining green wedge and as a result protect the setting of a number of Listed Buildings. It is acknowledged that the green wedge within Trimley St Martin is proposed to be included within the Areas to be Protected from Development and this is particularly welcomed and supported.

FPP27: Historic Park and Garden

We welcome the inclusion and the content of this policy.

C - 7144 - 744 - Preferred Policy FPP14: Felixstowe Town Centre - None

7144 Comment

Retail

Preferred Policy FPP14: Felixstowe Town Centre

Other Issues

Coastal Change Management and Areas of Flooding

We welcome the inclusion of this section. It is considered this section should also contain a paragraph on issues and opportunities of climate change and flooding relating to the Historic Environment. Further guidance on flooding issues can be found here- http://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/.

For information and for further policy consultation please note our new consultation email address for the East of England, eastplanningpolicy@HistoricEngland.org.uk.

Summary:

It is considered the policy should cover conservation and design issues. Also the policy should highlight the importance of retaining or restoring historic shopfront features both in terms of the positive contribution historic shopfronts make to the character of an area but also the economic benefit of providing traditional and bespoke shopping units to shopowners. As well as including conservation and design issues within these policies the Council could consider additional advice within a Supplementary Planning Guide on Historic Shopfronts, especially given the importance and contribution the Historic shopping areas within the settlements of Suffolk make to the wider area.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7247 - 2757 - Preferred Policy FPP14: Felixstowe Town Centre - None

7247 Object

Retail Preferred Policy FPP14: Felixstowe Town Centre

Respondent: Mr Andy Smith [2757] Agent: N/A

Full Text: Felixstowe Town Centre

The introduction of the term "Primary Shopping Area", as distinct from the crucial and long established "Primary Shopping Frontage" is unhelpful and confusing. It adds nothing useful to the (updated) long standing "Town Centre Area" concept, expect perhaps to suggest that retail uses would be discouraged in the area between the two, a novel and superfluous distinction. In fact, it is directly unhelpful as currently drafted, excluding the land adjacent to the station which has current planning permission for a supermarket, and for years had an extant previous permission for retail warehousing, highly desirable. It also excludes lower Hamilton Road and Bent Hill, both of which areas we would wish to see prosper in a retail and/or town centre mixed use mode, there by adding to the overall offer and in addition to better linkage between town centre and sea front, a long standing aspiration. Beyond that is has confused every reader of the document that I have spoken to. The policy and associated indication on the maps should be removed.

Clarity of Map

The main map at Appendix 7, while improved from earlier version, remains very hard to read and interpret. The clarity of the presentation on the map in the 2001 Plan is greatly superior. The lines need to be finer, and in more easily distinguished colours. The policy annotations key at the bottom should quote relevant FPP numbers. Clarity of the lines and hatchlings would be improved by the use of the "feint" style of OS base map. Also, that is out of date in regard to retaining the representation of the old groynes, replaced in 2008 (South) and 2012 (Central) respectively. I am fairly certain I have seen OS versions which are up to date in this respect. Again, if available, that would help clarity in that the groynes themselves become useful landmarks to locate details.

Summary:

The introduction of the term "Primary Shopping Area", as distinct from the crucial and long established "Primary Shopping Frontage" is unhelpful and confusing. It adds nothing useful to the (updated) long standing "Town Centre Area" concept, expect perhaps to suggest that retail uses would be discouraged in the area between the two, a novel and superfluous distinction. In fact, it is directly unhelpful as currently drafted, excluding the land adjacent to the station which has current planning permission for a supermarket, and for years had an extant previous permission for retail warehousing, highly desirable.

Change to Plan The policy and associated indication on the maps should be removed.

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7301 - 3843 - Preferred Policy FPP14: Felixstowe Town Centre - None

7301 Comment

Full Text:

Retail Preferred Policy FPP14: Felixstowe Town Centre

Respondent: Felixstowe Chamber of Trade and Commerce

(Rachel Cronin) [3843]

RESPONSE OF FELIXSTOWE CHAMBER OF TRADE AND COMMERCE TO THE FELIXSTOWE PENINSULAR

Agent:

N/A

AREA ACTION PLAN

FPP4

Felixstowe Chamber of Trade and Commerce supports development of new business units. Business units should consider light industrial and units for start-up businesses offering flexible terms.

The Chamber would also support modem eco design to suit the local environment.

FPP10

Felixstowe Chamber agrees with the policy to promote and safeguard land for employment, whether it relates to Port activities or otherwise. The development of Uniserve may increase the variety of employment opportunities not Port related.

FPP11 & 12

The Chamber supports the use of these area for start-up premises.

FPP14

The Chamber would wish the focus to extend to professional services on the ground floor as well as retail. It is as important for members of the public to access financial and legal services at ground level, particularly for those with disabilities. Many residents will expect such services to be located in the town centre for ease of access.

The Chamber supports the extension of the shared space and the improved connection between the town centre and the tourist centre. Retail in Felixstowe should be seen and promoted as part of the tourist offer.

FPP15

Again, the Chamber would seek an amendment to include reference to professional services being incorporated on the ground floor.

FPP21

The Chamber of Commerce supports the use of properties on the Sea Road to be resort related. The Chamber is concerned that residential and resort uses may conflict, in particular for car parking provision.

The Chamber of Commerce also supports any proposals which provide a link between the sea front and town centre.

FPP23

The Chamber supports the careful development of visitor car parking. Car parking should provide a clear town map with estimated distances on foot to tourist locations. The Chamber would support a one-day roaming ticket allowing visitors to park in any car park on the peninsular to encourage visitors to stay for the day and to explore the range of attractions.

Summary:

The Chamber would wish the focus to extend to professional services on the ground floor as well as retail. It is as important for members of the public to access financial and legal services at ground level, particularly for those with disabilities. Many residents will expect such services to be located in the town centre for ease of access. The Chamber supports the extension of the shared space and the improved connection between the town centre and the tourist centre. Retail in Felixstowe should be seen and promoted as part of the tourist offer.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

S - 6926 - 3854 - 5.13 - None

6926 Support

Retail 5.13

Respondent: Mr Michael Florey [3854] Agent: N/A

Full Text: Excellent, a good Felixstowe is what we want and I like the shared space area, although not to obvious where loading

and unloading can take place

Summary: Excellent, a good Felixstowe is what we want and I like the shared space area, although not to obvious where loading

and unloading can take place

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

C - 6774 - 3060 - Preferred Policy FPP15: Retail frontages - None

6774 Comment

Retail Preferred Policy FPP15: Retail frontages

Respondent: Felixstowe Town Council (Mr Ash Tadjrishi) [3060] Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Preferred Options Consultation

Thank you for the opportunity to respond to the Suffolk Coastal District Council Felixstowe Peninsula Area Action Plan Preferred Options paper. The Town Council considered this matter at its meeting of 11 November 2015.

Felixstowe Town Council was pleased to welcome and endorse the Felixstowe Peninsula Area Action Plan Preferred Options, subject to the following comments:

Page 13, Para. 2.02

We recommend adding the following to the end of the final sentence of this paragraph: ", as required by the July 2013 Local Plan."

Page 24, FPP3

Remove "(for residents and visitors)" from the bottom bullet relating to appropriate parking provision.

Page 26, Para. 3.30

This paragraph has been reduced in scope from an earlier draft and no longer references the unique location this site holds as a gateway to Felixstowe. It is vital that the policy ensures that any proposals for development of this site include appropriate consideration for this gateway and the statement this makes to those arriving to Felixstowe by road.

Page 27, FPP4

Remove "and Candlet Road" from the first bullet point. Any business units for this site should be restricted to the land adjacent to the A14 Dock Spur only.

Page 27, Title of 3.39

The title should read "Land" rather than "Lane" and include Swallow Close.

Page 29, FPP5

Please include Swallow Close and refer to this site as the "Land north of Conway Close and Swallow Close" throughout.

Page 49, Para. 5.06

Given the latest available information on these sites, this paragraph should be removed.

Page 50, Inset Map

The secondary shopping frontage should continue along Bent Hill on both sides of the road. It should also include the frontage of Trinity Methodist Church on Hamilton Road for consistency. Likewise the primary shopping area shaded in green should include this same section.

Page 51, Para. 5.10

Sentence should end "other than town centre uses".

Page 51, Para. 5.12

Please amend the final two sentences to read as follows:

"The scheme was not completed between Orwell Road and Bent Hill and the AAP will seek to encourage the continuation of the Shared Space along Hamilton Road. The completion of this scheme within the town centre boundary will provide a continuous link between Hamilton Road and Bent Hill and reinforce the connections between the town centre and the sea front."

Page 54, FPP15

Please amend the first paragraph to read "Any change of use proposals in this area should seek to retain a high proportion of retail activity."

Page 68, FPP21

Correction: "The provision of beach huts will be limited to those which currently exist. Any increased provision will be directed towards other parts of the sea front (namely Felixstowe Ferry Golf Club to Cobbolds Point Preferred Policy FPP19) as appropriate."

Page 74, FPP24

The policy should open with the following opening sentence:

"The need to strengthen Felixstowe as a seaside destination is recognised."

The next sentence should read: "Holiday accommodation will be encouraged and supported"

Page 82, FP27

This should be titled FPP27 rather than FP27.

C - 6774 - 3060 - Preferred Policy FPP15: Retail frontages - None

6774 Comment

Retail

Preferred Policy FPP15: Retail frontages

Please revise the first line of text to read "Spa Gardens and Town Hall Gardens".

Appendix 7:Felixstowe, Trimley St. Mary & Trimley St. Martin Inset Map.

The Physical Limits boundary in regard to the seaward boundary should be drawn as in the 2001 Local Plan map - i.e disappear in to the sea rather than be drawn along the low water mark.

The dotted blue line denoting Proposed Tourism Areas is misleading and these areas should be marked out to define the landward extent and total area covered by those corresponding policies. Landguard peninsula should also be encapsulated whereas the line appears to end at Landguard point. As above, the lines between the areas should simply stop at the sea. The extensions of those lines into the sea can be wrongly interpreted as representing a policy as applying to an element of the sea.

The port area should be included within the Physical Limits boundary as is the case in the 2001 Local Plan map. The Physical Limits boundary in the Manor End area should include the caravan parks and Custom House, terminating at the boundary of Landguard Common.

The colouring of some of the designations on the main map are confusingly similar, notably those for the Proposed District Centre, the District Centre boundary and the revised Physical Limits boundary. Also, the use of very heavy lines at the scale of the main map is unhelpful.

Notwithstanding these observations, thank you for the opportunity to have been consulted. The Town Council looks forward to receiving information on the further development of the Area Action Plan.

Summary:

Page 54, FPP15

Please amend the first paragraph to read "Any change of use proposals in this area should seek to retain a high proportion of retail activity."

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

AAP Preferred Options Consultation Response.pdf

C - 7145 - 744 - Preferred Policy FPP15: Retail frontages - None

7145 Comment

Retail Preferred Policy FPP15: Retail frontages

Respondent: Historic England (Sir/ Madam) [744] Agent: N/A

Full Text: Re: Preferred Options Public Consultation (19th October - 30th November 2015)

Felixstowe Peninsula Area Action Plan

Thank you for your letter dated 15th October 2015 regarding the above consultation. We have had the opportunity to assess the letter and consultation documents and can offer the following. Please note we have provided comments on the Site Allocations and Area Specific Policies within a separate letter to you dated the same. This follows a previous consultation and our comments dated 25th February 2015.

In terms of our general comments:

Recent Guidance from Historic England

We have recently published guidance on the Historic Environment and Site Allocations. Where we have not made comment below some additional guidance on ensuring a positive strategy for the historic environment is secured within the Felixstowe Area Action Plan can be seen by following this link- http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/.

In terms of our site specific comments:

Housing Sites

FPP4: Land north of Walton High Street, Felixstowe (451g)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the possible impact on the setting of two Listed Buildings, Grade II* Listed Walton Hall and Grade II Listed 362 High Street. We highlighted that the principal elevation of Walton Hall faces north and overlooks site 451g. It was considered that development here would urbanise the setting of this important, highly designated heritage asset, resulting in harm to its significance. It was expressed that harm would also be caused to the Grade II lodge and we strongly advised that an alternative site was found for development, though it was thought that there may be scope for some limited development at the eastern end of this site. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. The policy does however highlight that the development will need to be sympathetic to the Listed Buildings found at Walton Hall and 362 High Street. Whilst this would go some way to allay our concerns we still recommend that whilst it is considered the site can take a level of development there would be a detrimental harm to the setting of the Listed Buildings if the whole site is developed. If the site is to remain in the plan we would advise that the western end of the site is left relatively undeveloped to help protect the setting and it is considered that this side of the site might lend itself to fulfil the Public Open Space requirement.

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Town Centre

FFP14: Felixstowe Town Centre and FFP15: Retail Frontages

C - 7145 - 744 - Preferred Policy FPP15: Retail frontages - None

7145 Comment

Retail

Preferred Policy FPP15: Retail frontages

As outlined within our response to you dated 25th February 2015 it is considered these policies should cover conservation and design issues. It is considered the policies should highlight the importance of retaining or restoring historic shopfront features both in terms of the positive contribution historic shopfronts make to the character of an area but also the economic benefit of providing traditional and bespoke shopping units to shopowners. A good example of how historic shopfronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a National success. The council have also seen a ripple effect of surrounding properties being restored. As well as including conservation and design issues within these policies the Council could consider additional advice within a Supplementary Planning Guide on Historic Shopfronts, especially given the importance and contribution the Historic shopping areas within the settlements of Suffolk make to the wider area.

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FPP27: Historic Park and Garden

C - 7145 - 744 - Preferred Policy FPP15: Retail frontages - None

7145 Comment

Retail

Preferred Policy FPP15: Retail frontages

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Summary:

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Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7302 - 3843 - Preferred Policy FPP15: Retail frontages - None

7302 Comment

Retail Preferred Policy FPP15: Retail frontages

Respondent: Felixstowe Chamber of Trade and Commerce

(Rachel Cronin) [3843]

N/A Agent:

Full Text:

RESPONSE OF FELIXSTOWE CHAMBER OF TRADE AND COMMERCE TO THE FELIXSTOWE PENINSULAR

AREA ACTION PLAN

FPP4

Felixstowe Chamber of Trade and Commerce supports development of new business units. Business units should consider light industrial and units for start-up businesses offering flexible terms.

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FPP11 & 12

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FPP14

The Chamber would wish the focus to extend to professional services on the ground floor as well as retail. It is as important for members of the public to access financial and legal services at ground level, particularly for those with disabilities. Many residents will expect such services to be located in the town centre for ease of access.

The Chamber supports the extension of the shared space and the improved connection between the town centre and the tourist centre. Retail in Felixstowe should be seen and promoted as part of the tourist offer.

FPP15

Again, the Chamber would seek an amendment to include reference to professional services being incorporated on the ground floor.

FPP21

The Chamber of Commerce supports the use of properties on the Sea Road to be resort related. The Chamber is concerned that residential and resort uses may conflict, in particular for car parking provision.

The Chamber of Commerce also supports any proposals which provide a link between the sea front and town centre.

FPP23

The Chamber supports the careful development of visitor car parking. Car parking should provide a clear town map with estimated distances on foot to tourist locations. The Chamber would support a one-day roaming ticket allowing visitors to park in any car park on the peninsular to encourage visitors to stay for the day and to explore the range of attractions.

Summary:

Again, the Chamber would seek an amendment to include reference to professional services being incorporated on the around floor.

Change to Plan

Again, the Chamber would seek an amendment to include reference to professional services being incorporated on the ground floor.

Appear at exam? Not Specified

Legal? Not Specified

Duty to Cooperate? Not Specified Not Specified

Sound?

Soundness Tests None

Attachments:

C - 7672 - 2581 - Preferred Policy FPP15: Retail frontages - None

7672 Comment

Retail Preferred Policy FPP15: Retail frontages

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text: Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

- * FPP4 Walton Field evaluation has identified an Early-Middle Bronze Age funerary landscape across the site, with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.
- * FPP6 Trimley Cropmarks on this site show that there are complex archaeological remains of pits, ditches and a coaxial field system and trackways of possible late prehistoric date (TYN 122). Archaeological remains are therefore known on the site, although they have not been fully characterised.

Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7672 - 2581 - Preferred Policy FPP15: Retail frontages - None

7672 Comment

Retail

Preferred Policy FPP15: Retail frontages

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

Early Education

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The Government has indicated that it will legislate to double the number of hours' free childcare to 30. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

- In the Trimleys, developer contributions have already been secured to help manage the existing deficit in Early Years places and proposals are being drawn up to deliver additional places. Further development of the scale proposed (530 dwellings) will necessitate significant additional provision. Under current statutory arrangements, this would necessitate 53 additional places. When Land North of Walton High Street (400 dwellings) is included, the number of places required under current arrangements would increase to 93.

The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

- Development in the remainder of Felixstowe (150 dwellings North of Conway Close and 40 dwellings at Sea Road) can be managed by expanding existing settings.
- At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

The County Council would appreciate consideration of ways in which this policy could be more supportive of early education in retail centres, as part of a balanced policy which also protects the vitality and viability of retail centres. Policy FPP17 appears to implicitly support early education already, and discussion with the District Council may conclude that this policy is sufficient.

Primary Education

The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7672 - 2581 - Preferred Policy FPP15: Retail frontages - None

7672 Comment

Retail

Preferred Policy FPP15: Retail frontages

[see table in attached document]

Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

Grange Primary School can also expand, though this school is also not well related to the proposed allocations or future directions of growth.

Paragraphs 37 and 38 of the National Planning Policy Framework reflect the need to minimise the length of journeys to school and, for major developments, primary schools should be located within walking distance of most properties.

The best long term solution would be to reserve 2.2ha land for a new 315-place primary school and early years setting in a location which is well related to housing growth. This would also enable provision to be made for future growth, with another school capable of expansion.

Options for reserving land for a new primary school include:

- Land within 'Land North of Walton High Street'
- Land within another one of the Trimley sites
- Land in another location in the Trimleys, well related to sustainable travel routes and the new housing.

Secondary and Sixth Form Education

Based on standard pupil multipliers, development of 1,135 dwellings would be expected to generate an additional 204 secondary school pupils and an additional 45 sixth formers.

Felixstowe and the Trimleys are served by Felixstowe Academy. Based on the forecast below, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from the development proposed in this Plan.

[see table in attached document]

All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

Health, Wellbeing and Social Care

A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

C - 7672 - 2581 - Preferred Policy FPP15: Retail frontages - None

7672 Comment

Retail

Preferred Policy FPP15: Retail frontages

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

- * Ferry Road opposite site 502E
- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-

C - 7672 - 2581 - Preferred Policy FPP15: Retail frontages - None

7672 Comment

Retail

Preferred Policy FPP15: Retail frontages

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

Early Education. Whilst there is uncertainty around the level of provision which will be required it is clear that at least one new Early Years setting will be required, within the Trimleys / Walton High Street and potentially one other, dependent on future primary school provision. When co-location isn't possible SCC's next preference is for settings to be well related to retail and community facilities. This is considered complementary to retail uses given the footfall it would generate.

Change to Plan

Change to Plan. Consideration is given to ways in which policies FPP15 and FPP17 could be more supportive of early education in retail centres as part of a balanced policy which also protects vitality and viability of these centres.

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Felixstowe Sites FZ.pdf 2015-11-23 Felixstowe AAP_SCC Final Response.pdf Kirton Sites FZ.pdf Felixstowe Sites SW.pdf Kirton Sites SW.pdf

C - 7070 - 2744 - Preferred Policy FPP17: District Centres - None

7070 Comment

Retail Preferred Policy FPP17: District Centres

Respondent: Mr & Mrs Trevor & Gillian Mason [2744] Agent: N/A

Full Text: The below comments are forwarded in response to the consultation which ends on Monday 30th November 2015.

Housing

3.05 - "Within the Felixstowe Peninsula a figure of 50 units has been added to the requirement for Felixstowe Walton and the Trimlevs"

How is this figure calculated? The overall figure for Felixstowe has risen from 1,400 (inc the surrounding villages) in 2008 to 1,810 (exc the surrounding villages) in 2015. With this figure moving upwards all the time, the AAP will be meaningless by 2027. What plans are there to review it at regular intervals?

With regard to infrastructure provisions, there is currently a waiting list of 700 people at Crescent Dental Practice. The Grove Medical Centre (the largest in the town) is short of three doctors, and has to rely on retired GPs to try and fill the gaps. Their recent advertisement for salaried doctors achieved no applicants.

How are all these new residents going to be accommodated? Hoping for the best is not good enough.

Land North of Conway Close - SHLAA Ref. 502e

The Assessment is misleading and inaccurate in that it would provide access to two primary schools - if they still have capacity once the 200 homes have been built on the other side of Ferry Road. Those houses are intended to have their full quota of affordable houses in order to attract young families. For "Helps reduce the effects of traffic on the environment" read "access will be via a narrow country road which cannot cope with the current level of traffic". The main access to and from the Academy will be via a designated Quiet Lane, otherwise a two mile journey along Walton High Street will be necessary.

The site is referred to as "a central location" which is incorrect. It is 1.5 miles from the town centre, 4 miles by road from the Port complex, making a car essential. Its only large shopping outlet (20 minutes walk) is a convenience store whose prices accommodate small shopping needs only.

The site will suffer the same drainage problems as its neighbour, with developers to date being unable or unwilling to install a new system due to cost.

Preferred Policy FPP5:

150 dwellings is a minimum and based on medium density. No developer would be able to make a profit on providing 150 homes in keeping with existing (predominantly bungalows), let alone provide public open space and play facilities.

Directly opposite this site OPP was given last year for up to 200 homes, which represents high density. No stipulation was made that the new homes had to be in keeping with existing residences and no maximum height was given. No play space or open space is being provided (on the basis that the Council has refused to pay for its upkeep) and it is obvious that the same will apply to the 502e site.

District Centres

FPP17:

Expansion of District Centres - the DC identified at High Road East is entirely surrounded by houses. Apart from expanding across the road to Brackenbury Sports Centre, it does not seem possible to expand the retail element in this area.

In general terms, how is it possible to expand District Centres without affecting the town centre?

Some clarification on this point is necessary in order to convince the public.

Leisure

It can be anticipated that the 1,800 new residents will want something to do in their leisure time, but no specific activities are mentioned in the AAP. An opportunity has been lost with the designation of the old Yacht Pond site as a car park when it is not being used for mobile events - can this decision be reviewed in, say, two years time when useage for events is known? It would make a great site for a skate park and keep the youngsters off the road and the prom - particularly now the latter is being used by cyclists.

FPP22:

C - 7070 - 2744 - Preferred Policy FPP17: District Centres - None

7070 Comment

Retail Preferred Policy FPP17: District Centres

"Uses which enhance the unique landscape of Landguard" What are these? No examples are given. Does it take account of the current plans for the redevelopment of the Port and movement of the Viewing Point Café nearer to the museum? Car parking is essential to enjoy this area but should not be provided to the detriment of the natural enjoyment of this unique area.

Could some effort be made to ensure that bins are provided for detritus left by fishermen? Landguard beach is vulnerable to old bait and fish heads barely concealed in newspaper and buried in the shingle. This should not be allowed as it represents a serious hazard for others trying to enjoy the area. This will be particularly important if enhancement of the area is planned.

Summary:

Expansion of District Centres - the DC identified at High Road East is entirely surrounded by houses. Apart from expanding across the road to Brackenbury Sports Centre, it does not seem possible to expand the retail element in this area.

In general terms, how is it possible to expand District Centres without affecting the town centre?

Some clarification on this point is necessary in order to convince the public.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7146 - 744 - Preferred Policy FPP17: District Centres - None

7146 Comment

Retail Preferred Policy FPP17: District Centres

Respondent: Historic England (Sir/ Madam) [744] Agent: N/A

Full Text: Re: Preferred Options Public Consultation (19th October - 30th November 2015)

Felixstowe Peninsula Area Action Plan

Thank you for your letter dated 15th October 2015 regarding the above consultation. We have had the opportunity to assess the letter and consultation documents and can offer the following. Please note we have provided comments on the Site Allocations and Area Specific Policies within a separate letter to you dated the same. This follows a previous consultation and our comments dated 25th February 2015.

In terms of our general comments:

Recent Guidance from Historic England

We have recently published guidance on the Historic Environment and Site Allocations. Where we have not made comment below some additional guidance on ensuring a positive strategy for the historic environment is secured within the Felixstowe Area Action Plan can be seen by following this link- http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/.

In terms of our site specific comments:

Housing Sites

FPP4: Land north of Walton High Street, Felixstowe (451g)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the possible impact on the setting of two Listed Buildings, Grade II* Listed Walton Hall and Grade II Listed 362 High Street. We highlighted that the principal elevation of Walton Hall faces north and overlooks site 451g. It was considered that development here would urbanise the setting of this important, highly designated heritage asset, resulting in harm to its significance. It was expressed that harm would also be caused to the Grade II lodge and we strongly advised that an alternative site was found for development, though it was thought that there may be scope for some limited development at the eastern end of this site. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. The policy does however highlight that the development will need to be sympathetic to the Listed Buildings found at Walton Hall and 362 High Street. Whilst this would go some way to allay our concerns we still recommend that whilst it is considered the site can take a level of development there would be a detrimental harm to the setting of the Listed Buildings if the whole site is developed. If the site is to remain in the plan we would advise that the western end of the site is left relatively undeveloped to help protect the setting and it is considered that this side of the site might lend itself to fulfil the Public Open Space requirement.

FFP5: Land north of Conway Close, Felixstowe (502e)

We welcome the acknowledgment of the Listed Buildings and the requirement that development will need to be sympathetic to the Listed Buildings within the policy. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FFP6: Land opposite Hand in Hand Public House, Trimley St Martin (451b)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of two Grade II Listed Buildings (the Hand in Hand public house and Nos 251 and 253 High Road). We highlighted that both these buildings are traditional vernacular structures that date back to the agrarian origins of the village, and their current proximity to open countryside contributes to their setting and significance. We therefore encouraged the Local Planning Authority to identify alternative sites if at all possible so that the setting of these two buildings might be protected. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. However, it is also acknowledged that the policy requires a village green to be included within the scheme. The village green is to front High Road in order to reduce the impact on the setting of the Hand in Hand public house and this is particularly welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP7: Land off Howlett Way, Trimley St Martin (451c and 451d)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of the two Grade II listed churches and the Grade II listed Old Rectory. Whilst it is acknowledged that the consideration of the setting of the rectory is included within the policy, and this is welcomed, we would advise that the setting of the churches is also included. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP8: Land off Thurmans Lane, Trimley St Mary (383f and 451f)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of Grade II Listed Building Mill Farmhouse. It is acknowledged that there is a requirement in the policy that the development will need to be sympathetic to the setting of the mill and this is welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

Town Centre

FFP14: Felixstowe Town Centre and FFP15: Retail Frontages

As outlined within our response to you dated 25th February 2015 it is considered these policies should cover

C - 7146 - 744 - Preferred Policy FPP17: District Centres - None

7146 Comment

Retail

Preferred Policy FPP17: District Centres

conservation and design issues. It is considered the policies should highlight the importance of retaining or restoring historic shopfront features both in terms of the positive contribution historic shopfronts make to the character of an area but also the economic benefit of providing traditional and bespoke shopping units to shopowners. A good example of how historic shopfronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a National success. The council have also seen a ripple effect of surrounding properties being restored. As well as including conservation and design issues within these policies the Council could consider additional advice within a Supplementary Planning Guide on Historic Shopfronts, especially given the importance and contribution the Historic shopping areas within the settlements of Suffolk make to the wider area.

District Centres

FPP17: District Centres

As above it is considered that this policy should cover conservation and design issues. It should highlight the contribution the Historic Environment makes to the economic success of district centres and seek to protect and enhance both the setting of historic assets and assets themselves.

Tourism and Sea Front Activities

We welcome the inclusion of a section which covers tourism and seafront activities. It is considered that point 6.03 on page 61 could also acknowledge and highlight the wider and more general positive contribution to Felixstowe that heritage tourism brings.

FFP18: Felixstowe Ferry and Golf Course, FFP19: Felixstowe Ferry Golf Club to Cobbolds Point, FPP20: Cobbolds Point to Spa, FPP21: Spa to Martello Park and FFP22 Martello Park to Landguard We welcome and support the acknowledgement and required protection of the historic qualities of these sections of the coast.

FPP23: Car Parking

We welcome the 'high quality of design' requirement relating to replacement car parking at point 6.36 on page 72. It is considered that this requirement should be included within the policy itself to give it more weight in decision making.

The Environment

We welcome the inclusion of a section on the Historic Environment which sits separately from landscape and ecological elements. We also welcome the section on Locally Listed Buildings and Features. It is considered the Historic Environment section should also highlight Felixstowe's archaeology.

It is acknowledged that no individual policies on the Historic Environment are proposed for the Area Action Plan itself, relying instead on saved policies within the Core Strategy and the National Planning Policy Framework. The Core Strategy does not have a specific historic environment policy, with certain aspects covered in other policies such as SP15 (Landscape and Townscape) and DM21 (Design Aesthetics) and policies for specific settlements. It is considered that there is a lack of a clear strategy relating to the Historic Environment, relating to local issues, at present, and we would encourage greater clarity. This should set out the Council's approach to the management of designated and non-designated heritage assets (including archaeology) and how issues such as heritage at risk will be tackled. It is considered that a Historic Environment Policy could be locally specific to cover the Felixstowe Peninsula Area Action Plan.

In addition to the above it is acknowledged that the issue of Felixstowe South Conservation Area At Risk is not being covered by the Plan. We therefore reiterate our previous comments as follows, it would be advantageous if the Area Action Plan identified specific policies to help remove it from the register. These might include utilising the conservation area appraisal to identify locally important buildings that contribute positively to the conservation area, and introduction Article 4 directives to protect such buildings. There may also be sites which are considered negative contributors to the character and appearance of the conservation area and the preparation of development briefs for such sites might help bring forward positive redevelopment. The conservation area survey identified the loss of architectural detail as a significant problem, and consideration might therefore be given to applying to the Heritage Lottery Fund for a Townscape Heritage programme for the area, or a smaller partnership scheme with Historic England to reinstate lost architectural details on key buildings. We would therefore still recommend the inclusion of a policy which tackles the issues at Felixstowe South Conservation Area.

FPP26: Areas to be Protected from Development

In our response to you dated 25th February 2015 we expressed concerns regard the inclusion of all the sites in Trimley St Martin which would in effect surround a number of Listed Buildings including Grade II listed churches, the Grade II listed Old Rectory and Grade II Listed Building Mill Farmhouse. We recommended the inclusion of an area to be protected from development which would protect the remaining green wedge and as a result protect the setting of a number of Listed Buildings. It is acknowledged that the green wedge within Trimley St Martin is proposed to be included within the Areas to be Protected from Development and this is particularly welcomed and supported.

FPP27: Historic Park and Garden

We welcome the inclusion and the content of this policy.

C - 7146 - 744 - Preferred Policy FPP17: District Centres - None

7146 Comment

Retail Preferred Policy FPP17: District Centres

Other Issues

Coastal Change Management and Areas of Flooding

We welcome the inclusion of this section. It is considered this section should also contain a paragraph on issues and opportunities of climate change and flooding relating to the Historic Environment. Further guidance on flooding issues can be found here- http://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/.

For information and for further policy consultation please note our new consultation email address for the East of England, eastplanningpolicy@HistoricEngland.org.uk.

Summary:

As above it is considered that this policy should cover conservation and design issues. It should highlight the contribution the Historic Environment makes to the economic success of district centres and seek to protect and enhance both the setting of historic assets and assets themselves.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7673 - 2581 - Preferred Policy FPP17: District Centres - None

7673 Comment

Retail Preferred Policy FPP17: District Centres

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text: Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

- * FPP4 Walton Field evaluation has identified an Early-Middle Bronze Age funerary landscape across the site, with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.
- * FPP6 Trimley Cropmarks on this site show that there are complex archaeological remains of pits, ditches and a coaxial field system and trackways of possible late prehistoric date (TYN 122). Archaeological remains are therefore known on the site, although they have not been fully characterised.

Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7673 - 2581 - Preferred Policy FPP17: District Centres - None

7673 Comment

Retail

Preferred Policy FPP17: District Centres

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

Early Education

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The Government has indicated that it will legislate to double the number of hours' free childcare to 30. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

- In the Trimleys, developer contributions have already been secured to help manage the existing deficit in Early Years places and proposals are being drawn up to deliver additional places. Further development of the scale proposed (530 dwellings) will necessitate significant additional provision. Under current statutory arrangements, this would necessitate 53 additional places. When Land North of Walton High Street (400 dwellings) is included, the number of places required under current arrangements would increase to 93.

The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

- Development in the remainder of Felixstowe (150 dwellings North of Conway Close and 40 dwellings at Sea Road) can be managed by expanding existing settings.
- At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

The County Council would appreciate consideration of ways in which this policy could be more supportive of early education in retail centres, as part of a balanced policy which also protects the vitality and viability of retail centres. Policy FPP17 appears to implicitly support early education already, and discussion with the District Council may conclude that this policy is sufficient.

Primary Education

The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7673 - 2581 - Preferred Policy FPP17: District Centres - None

7673 Comment

Retail

Preferred Policy FPP17: District Centres

[see table in attached document]

Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

Grange Primary School can also expand, though this school is also not well related to the proposed allocations or future directions of growth.

Paragraphs 37 and 38 of the National Planning Policy Framework reflect the need to minimise the length of journeys to school and, for major developments, primary schools should be located within walking distance of most properties.

The best long term solution would be to reserve 2.2ha land for a new 315-place primary school and early years setting in a location which is well related to housing growth. This would also enable provision to be made for future growth, with another school capable of expansion.

Options for reserving land for a new primary school include:

- Land within 'Land North of Walton High Street'
- Land within another one of the Trimley sites
- Land in another location in the Trimleys, well related to sustainable travel routes and the new housing.

Secondary and Sixth Form Education

Based on standard pupil multipliers, development of 1,135 dwellings would be expected to generate an additional 204 secondary school pupils and an additional 45 sixth formers.

Felixstowe and the Trimleys are served by Felixstowe Academy. Based on the forecast below, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from the development proposed in this Plan.

[see table in attached document]

All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

Health, Wellbeing and Social Care

A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

C - 7673 - 2581 - Preferred Policy FPP17: District Centres - None

7673 Comment

Retail

Preferred Policy FPP17: District Centres

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

- * Ferry Road opposite site 502E
- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-

C - 7673 - 2581 - Preferred Policy FPP17: District Centres - None

7673 Comment

Retail

Preferred Policy FPP17: District Centres

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

Early Education. Whilst there is uncertainty around the level of provision which will be required it is clear that at least one new Early Years setting will be required, within the Trimleys / Walton High Street and potentially one other, dependent on future primary school provision. When co-location isn't possible SCC's next preference is for settings to be well related to retail and community facilities. This is considered complementary to retail uses given the footfall it would generate.

Change to Plan

Change to Plan. Consideration is given to ways in which policies FPP15 and FPP17 could be more supportive of early education in retail centres as part of a balanced policy which also protects vitality and viability of these centres.

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Kirton Sites FZ.pdf
Felixstowe Sites FZ.pdf
Kirton Sites SW.pdf
Felixstowe Sites SW.pdf
2015-11-23 Felixstowe AAP_SCC Final Response.pdf

C - 6889 - 3785 - 6.01 - None

6889 Comment

Tourism and Sea Front activities 6.01

Respondent: Stephen Wyatt [3785] Agent: N/A

Full Text: The needs of residents should be mentioned in this section and balanced against the desire to develop the tourism offer

Summary: The needs of residents should be mentioned in this section and balanced against the desire to develop the tourism offer

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7086 - 3894 - 6.01 - None

7086 Comment

Tourism and Sea Front activities

6.01

Respondent: Mr Richard Burrow [3894] Agent: N/A

Full Text:

Having read the Felixstowe Peninsula Area Action Plan I am pleased with much of the content in that many of the environmental issues have been identified. However, I disagree with the assumption that the town's growth is inevitable at the expense of greenfield sites and extra burdens on the sewage and highways networks. There is mention of 'organic growth'; the plans go far beyond this. Here are my observations:

- 3.01 There is a reference to the need for 807 new homes for the peninsula. How has this demand been identified? Is there actually a growing population or is valuable farmland and countryside being sacrificed to artificially create a demand for new housing for the benefit of developers? With Felixstowe's specific demographic, there is a natural turnover of the different types of housing as residents move through the different phases of their lives e.g. downsizing through retirement or infirmity, meaning that properties are regularly becoming available (with the possible exception of affordable homes for purchase by first time buyers).
- 3.27 The area between the A14 Spur, Candlet Road and High Street, Walton is valuable and productive farmland and effectively constitutes a green belt in all but name between the Trimleys and Walton. The suggested development would change the rural nature of the approach to Felixstowe and further urbanise Candlet Road, particularly with the planned new road junction. I feel strongly that it should remain as farmland. The same argument applies to the other large greenfield sites identified, Poultry and Mill farms.
- 3.39 Development of this site to the north of Conway Close will contribute to the spread of the town into open countryside as well as causing ribbon development along Ferry Road. The fears that new housing in this area will impinge on Gulpher Lane in terms of traffic are very real; Colneis Road will definitely suffer increased vehicle use. This rural fringe of Old Felixstowe is picturesque and should be protected, in my opinion.
- 6.0 There is no mention in the document of the contribution of sea angling to the local economy, a strange omission for a town with a long tradition of fishing. I fish the local beaches twice a week on average and am impressed by how far visiting anglers travel to our shores. Perhaps there should be some appropriate signage identifying suitable fishing areas, launching sites, species with size limits etc. and the provision of vantage points for disabled anglers could be a possibility. Measures to promote such a healthy outdoor activity could be very beneficial to Felixstowe. Any putative redevelopment of the pier could have some planning requirements encouraging the attachment of a fishing jetty-Southwold Pier was built with this feature as part of the design.
- 6.34/ 6.35 Many vehicle enthusiasts see Felixstowe as destination of choice. The local plan could incorporate provision in the form of a designated sea front space (a car park on other days) that is bookable by, for example, classic car or motorcycle clubs, scooter enthusiasts etc. This would serve such organisations with the bonus of providing additional attractions for both visitors and residents in a regulated environment.

Summary:

There is no mention in the document of the contribution of sea angling to the local economy. I fish the local beaches twice a week on average and am impressed by how far visiting anglers travel. Perhaps there should be some appropriate signage identifying suitable fishing areas, launching sites, etc. The provision of vantage points for disabled anglers could be a possibility. Measures to promote such a healthy outdoor activity could be very beneficial to Felixstowe. Any redevelopment of the pier could have some planning requirements encouraging the attachment of a fishing jetty- Southwold Pier was built with this feature.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7597 - 3451 - 6.01 - None

7597 Comment

Tourism and Sea Front activities

6.01

Respondent: Mr Michael Ninnmey [3451] Agent: N/A

Full Text:

In the previous response to the Consultation I requested whatever the "House Occupancy" was as E of E indicated back in 2004/5: which indicated that 50% of build was because less people in dwellings. What impact did 2008 crash have?

FPAAP

1.09

Sevenhill interchange suffers congestion already.

1.17

No reference to Health or wellbeing provision.

No reference on "Historic structures" A number at Risk.

2 02

No reference to Area pre- 1890 Walton has been erased!

2.10

By 2027! Children of many residents will have moved, because house building not meeting needs of local people, particularly low income young residents.

Para 3 Infrastructure Health & Sport. No proposal of provision.

2 11

The housing 1/4/2010 - 31/3/2015 has failed to deliver the agreed 106. Afford Housing.

FDD1

2010/13 1,003: no indication on map where? Misleading to 2027 land used.

EDD3

Alternative location for "open air market" visitor & tourist attraction.

Layout as Felix Multi plan?

Road facing Walton Hall: see Walton Green scheme:

- i) Retain rifle club, mitigate against noise on residents e.g acoustic barriers
- ii) Retain original coach house for Walton Hall!
- iii) HIDE NEW DEVELOPMENT BEHIND BOTH VALUED COMMUNITY ASSETS

FPP3 - 9

930 dwellings are to be added to rest of 1,003 plus windfall to access Felixstowe Port via jctn High road west/Garrison. This jctn has STANDING traffic back to HALF MOON Public hse NOW.

No mitigation shown on address this problem now a major concern in Walton - cum - Felixstowe is the Air Quality, (the H.R.W particularly has flood water through to the gravel.

Of increasing concern with VW rigging exhaust test.

Genera

- i) 106 agreement required provision of contribution to playspace and sports space: both of which are under provided. No indication as to how the C.I.L will make up for the shortfall and individual provision.
- ii) Community Hospital had 16 beds/no indication what extra to meet need of extra 5,000 people?
- iii) Map: fails to show position of the 1,003: The green lungs of Trimley St Martin, ST MARY, WALTON, OLD FELIXSTOWE at 2027 will only be PARKS & schools.
- iv) The buffer between settlements St Martin, ST MARY & WALTON gone.
- v) ECO-VILLAGE agreed in 2005 CS should be revised now or when 1,760 is reviewed.

4.06

The employment figures previously, have proved true?

How many "posts" are filled from outside FPAAP area? What will road traffic be by 2027? When the dual track completion date? Promise of a Ferry Quay to serve Harwich - Shotley - Felixstowe, ferry when?

No progress on supermarket provision?

No comment on underused land/council estate

Rail head in heart of Town H.R.W - Hamilton Rd, ST ANDREWS RD and GARRISON LANE.

Tourism

- i) Level footpath orwell to Deben fil in missing link of 300m? ASAP
- ii) Allow use of existing landing stages

Summary: Tourism

- i) Level footpath orwell to Deben fil in missing link of 300m? ASAP
- ii) Allow use of existing landing stages

Change to Plan

C - 7597 - 3451 - 6.01 - None

7597 Comment

Tourism and Sea Front activities

Appear at exam?
Not Specified

Legal?
Not Specified

Sound? Not Specified

Duty to Cooperate?Not Specified

6.01

Soundness Tests

None

Attachments:

M Ninnmey Comments.pdf

O - 6740 - 3782 - 6.02 - None

6740 Object

Tourism and Sea Front activities 6.02

Respondent: Mary Wyatt [3782] Agent: N/A

Full Text: Notice should be taken of residential amenity when planning for tourism. Residents are a very important part of the

health of the town, but are rarely considered.

Summary: Notice should be taken of residential amenity when planning for tourism. Residents are a very important part of the

health of the town, but are rarely considered.

Change to Plan Undertake to make sure residential needs are not overruled by tourism plans. Make sure residents' needs are

considered. Residents are a very important part of the financial health of Felixstowe.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

S - 7147 - 744 - 6.03 - None

7147 Support

Tourism and Sea Front activities

6.03

Respondent: Historic England (Sir/ Madam) [744] Agent: N/A

Full Text: Re: Preferred Options Public Consultation (19th October - 30th November 2015)

Felixstowe Peninsula Area Action Plan

Thank you for your letter dated 15th October 2015 regarding the above consultation. We have had the opportunity to assess the letter and consultation documents and can offer the following. Please note we have provided comments on the Site Allocations and Area Specific Policies within a separate letter to you dated the same. This follows a previous consultation and our comments dated 25th February 2015.

In terms of our general comments:

Recent Guidance from Historic England

We have recently published guidance on the Historic Environment and Site Allocations. Where we have not made comment below some additional guidance on ensuring a positive strategy for the historic environment is secured within the Felixstowe Area Action Plan can be seen by following this link- http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/.

In terms of our site specific comments:

Housing Sites

FPP4: Land north of Walton High Street, Felixstowe (451g)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the possible impact on the setting of two Listed Buildings, Grade II* Listed Walton Hall and Grade II Listed 362 High Street. We highlighted that the principal elevation of Walton Hall faces north and overlooks site 451g. It was considered that development here would urbanise the setting of this important, highly designated heritage asset, resulting in harm to its significance. It was expressed that harm would also be caused to the Grade II lodge and we strongly advised that an alternative site was found for development, though it was thought that there may be scope for some limited development at the eastern end of this site. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. The policy does however highlight that the development will need to be sympathetic to the Listed Buildings found at Walton Hall and 362 High Street. Whilst this would go some way to allay our concerns we still recommend that whilst it is considered the site can take a level of development there would be a detrimental harm to the setting of the Listed Buildings if the whole site is developed. If the site is to remain in the plan we would advise that the western end of the site is left relatively undeveloped to help protect the setting and it is considered that this side of the site might lend itself to fulfil the Public Open Space requirement.

FFP5: Land north of Conway Close, Felixstowe (502e)

We welcome the acknowledgment of the Listed Buildings and the requirement that development will need to be sympathetic to the Listed Buildings within the policy. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FFP6: Land opposite Hand in Hand Public House, Trimley St Martin (451b)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of two Grade II Listed Buildings (the Hand in Hand public house and Nos 251 and 253 High Road). We highlighted that both these buildings are traditional vernacular structures that date back to the agrarian origins of the village, and their current proximity to open countryside contributes to their setting and significance. We therefore encouraged the Local Planning Authority to identify alternative sites if at all possible so that the setting of these two buildings might be protected. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. However, it is also acknowledged that the policy requires a village green to be included within the scheme. The village green is to front High Road in order to reduce the impact on the setting of the Hand in Hand public house and this is particularly welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP7: Land off Howlett Way, Trimley St Martin (451c and 451d)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of the two Grade II listed churches and the Grade II listed Old Rectory. Whilst it is acknowledged that the consideration of the setting of the rectory is included within the policy, and this is welcomed, we would advise that the setting of the churches is also included. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP8: Land off Thurmans Lane, Trimley St Mary (383f and 451f)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of Grade II Listed Building Mill Farmhouse. It is acknowledged that there is a requirement in the policy that the development will need to be sympathetic to the setting of the mill and this is welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

Town Centre

FFP14: Felixstowe Town Centre and FFP15: Retail Frontages

As outlined within our response to you dated 25th February 2015 it is considered these policies should cover

S - 7147 - 744 - 6.03 - None

7147 Support

Tourism and Sea Front activities

6.03

conservation and design issues. It is considered the policies should highlight the importance of retaining or restoring historic shopfront features both in terms of the positive contribution historic shopfronts make to the character of an area but also the economic benefit of providing traditional and bespoke shopping units to shopowners. A good example of how historic shopfronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a National success. The council have also seen a ripple effect of surrounding properties being restored. As well as including conservation and design issues within these policies the Council could consider additional advice within a Supplementary Planning Guide on Historic Shopfronts, especially given the importance and contribution the Historic shopping areas within the settlements of Suffolk make to the wider area.

District Centres

FPP17: District Centres

As above it is considered that this policy should cover conservation and design issues. It should highlight the contribution the Historic Environment makes to the economic success of district centres and seek to protect and enhance both the setting of historic assets and assets themselves.

Tourism and Sea Front Activities

We welcome the inclusion of a section which covers tourism and seafront activities. It is considered that point 6.03 on page 61 could also acknowledge and highlight the wider and more general positive contribution to Felixstowe that heritage tourism brings.

FFP18: Felixstowe Ferry and Golf Course, FFP19: Felixstowe Ferry Golf Club to Cobbolds Point, FPP20: Cobbolds Point to Spa, FPP21: Spa to Martello Park and FFP22 Martello Park to Landguard We welcome and support the acknowledgement and required protection of the historic qualities of these sections of the coast.

FPP23: Car Parking

We welcome the 'high quality of design' requirement relating to replacement car parking at point 6.36 on page 72. It is considered that this requirement should be included within the policy itself to give it more weight in decision making.

The Environment

We welcome the inclusion of a section on the Historic Environment which sits separately from landscape and ecological elements. We also welcome the section on Locally Listed Buildings and Features. It is considered the Historic Environment section should also highlight Felixstowe's archaeology.

It is acknowledged that no individual policies on the Historic Environment are proposed for the Area Action Plan itself, relying instead on saved policies within the Core Strategy and the National Planning Policy Framework. The Core Strategy does not have a specific historic environment policy, with certain aspects covered in other policies such as SP15 (Landscape and Townscape) and DM21 (Design Aesthetics) and policies for specific settlements. It is considered that there is a lack of a clear strategy relating to the Historic Environment, relating to local issues, at present, and we would encourage greater clarity. This should set out the Council's approach to the management of designated and non-designated heritage assets (including archaeology) and how issues such as heritage at risk will be tackled. It is considered that a Historic Environment Policy could be locally specific to cover the Felixstowe Peninsula Area Action Plan.

In addition to the above it is acknowledged that the issue of Felixstowe South Conservation Area At Risk is not being covered by the Plan. We therefore reiterate our previous comments as follows, it would be advantageous if the Area Action Plan identified specific policies to help remove it from the register. These might include utilising the conservation area appraisal to identify locally important buildings that contribute positively to the conservation area, and introduction Article 4 directives to protect such buildings. There may also be sites which are considered negative contributors to the character and appearance of the conservation area and the preparation of development briefs for such sites might help bring forward positive redevelopment. The conservation area survey identified the loss of architectural detail as a significant problem, and consideration might therefore be given to applying to the Heritage Lottery Fund for a Townscape Heritage programme for the area, or a smaller partnership scheme with Historic England to reinstate lost architectural details on key buildings. We would therefore still recommend the inclusion of a policy which tackles the issues at Felixstowe South Conservation Area.

FPP26: Areas to be Protected from Development

In our response to you dated 25th February 2015 we expressed concerns regard the inclusion of all the sites in Trimley St Martin which would in effect surround a number of Listed Buildings including Grade II listed churches, the Grade II listed Old Rectory and Grade II Listed Building Mill Farmhouse. We recommended the inclusion of an area to be protected from development which would protect the remaining green wedge and as a result protect the setting of a number of Listed Buildings. It is acknowledged that the green wedge within Trimley St Martin is proposed to be included within the Areas to be Protected from Development and this is particularly welcomed and supported.

FPP27: Historic Park and Garden

We welcome the inclusion and the content of this policy.

S - 7147 - 744 - 6.03 - None

7147 Support

Tourism and Sea Front activities

6.03

Other Issues

Coastal Change Management and Areas of Flooding

We welcome the inclusion of this section. It is considered this section should also contain a paragraph on issues and opportunities of climate change and flooding relating to the Historic Environment. Further guidance on flooding issues can be found here- http://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/.

For information and for further policy consultation please note our new consultation email address for the East of England, eastplanningpolicy@HistoricEngland.org.uk.

Summary:

We welcome the inclusion of a section which covers tourism and seafront activities. It is considered that point 6.03 on page 61 could also acknowledge and highlight the wider and more general positive contribution to Felixstowe that

heritage tourism brings.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

C - 6780 - 3060 - 6.04 - None

6780 Comment

Tourism and Sea Front activities

6.04

Respondent: Felixstowe Town Council (Mr Ash Tadjrishi) [3060] Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Preferred Options Consultation

Thank you for the opportunity to respond to the Suffolk Coastal District Council Felixstowe Peninsula Area Action Plan Preferred Options paper. The Town Council considered this matter at its meeting of 11 November 2015.

Felixstowe Town Council was pleased to welcome and endorse the Felixstowe Peninsula Area Action Plan Preferred Options, subject to the following comments:

Page 13, Para. 2.02

We recommend adding the following to the end of the final sentence of this paragraph: ", as required by the July 2013 Local Plan."

Page 24, FPP3

Remove "(for residents and visitors)" from the bottom bullet relating to appropriate parking provision.

Page 26, Para. 3.30

This paragraph has been reduced in scope from an earlier draft and no longer references the unique location this site holds as a gateway to Felixstowe. It is vital that the policy ensures that any proposals for development of this site include appropriate consideration for this gateway and the statement this makes to those arriving to Felixstowe by road.

Page 27, FPP4

Remove "and Candlet Road" from the first bullet point. Any business units for this site should be restricted to the land adjacent to the A14 Dock Spur only.

Page 27, Title of 3.39

The title should read "Land" rather than "Lane" and include Swallow Close.

Page 29, FPP5

Please include Swallow Close and refer to this site as the "Land north of Conway Close and Swallow Close" throughout.

Page 49, Para. 5.06

Given the latest available information on these sites, this paragraph should be removed.

Page 50, Inset Map

The secondary shopping frontage should continue along Bent Hill on both sides of the road. It should also include the frontage of Trinity Methodist Church on Hamilton Road for consistency. Likewise the primary shopping area shaded in green should include this same section.

Page 51, Para. 5.10

Sentence should end "other than town centre uses".

Page 51, Para. 5.12

Please amend the final two sentences to read as follows:

"The scheme was not completed between Orwell Road and Bent Hill and the AAP will seek to encourage the continuation of the Shared Space along Hamilton Road. The completion of this scheme within the town centre boundary will provide a continuous link between Hamilton Road and Bent Hill and reinforce the connections between the town centre and the sea front."

Page 54, FPP15

Please amend the first paragraph to read "Any change of use proposals in this area should seek to retain a high proportion of retail activity."

Page 68, FPP21

Correction: "The provision of beach huts will be limited to those which currently exist. Any increased provision will be directed towards other parts of the sea front (namely Felixstowe Ferry Golf Club to Cobbolds Point Preferred Policy FPP19) as appropriate."

Page 74, FPP24

The policy should open with the following opening sentence:

"The need to strengthen Felixstowe as a seaside destination is recognised."

The next sentence should read: "Holiday accommodation will be encouraged and supported"

Page 82, FP27

This should be titled FPP27 rather than FP27.

C - 6780 - 3060 - 6.04 - None

6780 Comment

Tourism and Sea Front activities

6.04

Please revise the first line of text to read "Spa Gardens and Town Hall Gardens".

Appendix 7:Felixstowe, Trimley St. Mary & Trimley St. Martin Inset Map.
The Physical Limits boundary in regard to the seaward boundary should be drawn as in the 2001 Local Plan map - i.e disappear in to the sea rather than be drawn along the low water mark.

The dotted blue line denoting Proposed Tourism Areas is misleading and these areas should be marked out to define the landward extent and total area covered by those corresponding policies. Landguard peninsula should also be encapsulated whereas the line appears to end at Landguard point. As above, the lines between the areas should simply stop at the sea. The extensions of those lines into the sea can be wrongly interpreted as representing a policy as applying to an element of the sea.

The port area should be included within the Physical Limits boundary as is the case in the 2001 Local Plan map. The Physical Limits boundary in the Manor End area should include the caravan parks and Custom House, terminating at the boundary of Landguard Common.

The colouring of some of the designations on the main map are confusingly similar, notably those for the Proposed District Centre, the District Centre boundary and the revised Physical Limits boundary. Also, the use of very heavy lines at the scale of the main map is unhelpful.

Notwithstanding these observations, thank you for the opportunity to have been consulted. The Town Council looks forward to receiving information on the further development of the Area Action Plan.

Summary:

The dotted blue line denoting Proposed Tourism Areas is misleading and these areas should be marked out to define the landward extent and total area covered by those corresponding policies. Landguard peninsula should also be encapsulated whereas the line appears to end at Landguard point. As above, the lines between the areas should simply stop at the sea. The extensions of those lines into the sea can be wrongly interpreted as representing a policy as applying to an element of the sea.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

AAP Preferred Options Consultation Response.pdf

S - 6734 - 3782 - 6.09 - None

6734 Support

Tourism and Sea Front activities 6.09

Respondent: Mary Wyatt [3782] Agent: N/A

Full Text: Why has the development of a very large, tall house been allowed? The building concerned was partly demolished and

is now being rebuilt. It is in the line of buildings between the Victoria and the Sailing Club. It is completely out of

proportion to any other building in this area.

Summary: Why has the development of a very large, tall house been allowed? The building concerned was partly demolished and

is now being rebuilt. It is in the line of buildings between the Victoria and the Sailing Club. It is completely out of

proportion to any other building in this area.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

C - 6811 - 2839 - 6.10 - None

6811 Comment

Tourism and Sea Front activities

6.10

Respondent: RSPB (Jacqui Miller) [2839] Agent: N/A

Full Text: Re: Site Allocations and Area Specific Policies - Preferred Options Consultation

Thank you for consulting the RSPB regarding the Preferred Options Consultation. Please find our comments below.

Site Allocations and Area Specific Policies DPD - Preferred Options Consultation Document

Introduction

Paras. 106-107 and Policy SSP1 refer to the planning application at Adastral Park. It should be noted that at this stage, there cannot be confidence that the application and its associated green space provision will be realised, as the application is as yet undetermined. Therefore this project should not be relied upon to provide mitigation for recreational pressure on European sites through the provision of green space for the district as a whole.

SSP3 Land to the rear of Rose Hill, Saxmundham Road, Aldeburgh (SHLAA ref 608)

We have previously raised concerns (in our response of 26th February 2015 to the Issues and Options consultation) about this site regarding its proximity to the Alde-Ore Estuary SPA and Ramsar site, however, this was on the basis of 69-108 houses. A reduction to ten houses plus a care home may reduce concerns, but this restriction should be clearly worded (as an upper limit) into the resulting policy (SSP3). At present it is not clear whether the requirement is for less than ten units (as in the excerpt from the Sustainability Appraisal) or 'around ten' as in para. 2.23. As noted in the Habitats Regulations Assessment (HRA), the status and use of the access route to the estuary should be clarified, and the provision of alternative open space considered. It should be noted that, if an application is brought forward for this site, HRA at the project level will be required, and proposals for mitigation should be included in plans for any development.

We support the rejection of alternative option site 982. We note that Appendix 3 indicates that this site was rejected due to potential effects on the Alde-Ore Estuary SPA (in line with our comments). This should be recognised here.

SSP10 Land west of Garden Square Rendlesham

We support the requirement to provide open space for daily dog walking as an alternative to the more sensitive Tunstall and Rendlesham Forests (part of the Sandlings SPA).

SSP22 Bentwaters Park, Rendlesham

We note that the policy refers to the sensitivities of this site within the AONB. This policy should also recognise that Bentwaters Parks adjoins the Sandlings SPA and is in close proximity to the Alde-Ore Estuary SPA, SAC and Ramsar site. It will be necessary to consider potential effects on these designated wildlife sites when making decisions as to future activities on this site.

Section 5 - Tourism

References to Natura 2000 sites in para. 5.02 should include the Sandlings, as well as the estuaries.

Policy SSP30 proposes a restriction on public car parking within 1km of the Deben Estuary as mitigation against increases in recreational pressure resulting from the in-combination effects of housing proposals in the area. Whilst we support some restrictions on new parking provision, we suggest this should focus on provision relating to activities likely to cause most disturbance and/or locations that are most sensitive to disturbance. Seasonal restrictions could also be considered, based on the presence of sensitive species. We are also concerned that purely restricting access does not encourage responsible behaviour and enjoyment of and respect for the natural environment. We therefore recommend that consideration is given to a range of mitigation measures which could be funded through a formalised developer contributions scheme. The Council should consider those measures proposed in the Deben Estuary Plan, with examples including:

□ seasonally adapted routes including diversions if necessary
□ screening of routes
provision of information to visitors - signage, interpretation, community events to educate people about the
importance of the area and responsible visiting
□ gates preventing dogs running ahead
□ bunds and hides etc to screen birds from visitors in sensitive areas
□ managing visitor numbers during busy periods through charging and parking restrictions
□ quidance for dog walkers and river users (e.g. through codes of conduct)
□ a wardening scheme
an ongoing visitor management plan - including provision for monitoring of impacts and review of mitigation

As noted in para. 5.05 of the Site Allocations and Area Specific Policies DPD, this approach should be complemented with provision of areas of attractive alternative green space, including areas suitable for dog walking, within individual

C - 6811 - 2839 - 6.10 - None

6811 Comment

Tourism and Sea Front activities

6.10

development sites.

SSP31 Snape Maltings

While para. 5.06 refers to the conservation importance of the area within which Snape Maltings is set, the policy itself does not. We recommend that the sentence requiring that all proposals should seek to protect and enhance the special character and interest of the heritage assets should be amended to include the natural environment as well.

Section 6 Recreation and Green Infrastructure

We are pleased that the Haven Gateway Green Infrastructure Strategy (HAGGIS) has recently been updated, however, this update does not appear to be available for review. In our previous comments of 26th February 2015 on the Issues and Options consultation, we recommended that the 2011 Green Infrastructure Strategy for the Suffolk Coastal district is also updated. We commented that:

"At present the district Green Infrastructure Strategy appears focused on recreational provision. Whilst important, we consider that there is also an opportunity to expand the Strategy to include biodiversity targets. This should aim to create networks of sites of biodiversity value that 'fill the gaps' between existing green space features and sites of importance for biodiversity. Joined up networks are more functional and allow species to move between sites, helping them to adapt to the likely effects of climate change. We recommend that the currently available maps of priority habitat types are supplemented by map(s) showing designated sites (including international sites, SSSIs and County Wildlife Sites). These maps of current biodiversity resource can then be used to identify those areas which could be targeted for restoration, buffering or linkage through habitat creation or restoration."

RSPB response to Suffolk Coastal District Council Site Allocations and Area Specific Policies Issues and Options Consultation, 26th February 2015

These comments are still relevant. We also recommend that the outputs from the HAGGIS update and an update to the Suffolk Coastal Green Infrastructure Strategy should be consolidated into an SPD setting out a district-wide strategy, alongside standards for green infrastructure provision within developments. The production of an SPD would clarify and formalise requirements and ensure that there is one easily accessible set of targets and standards for the district.

Section 7 - Environment

Para. 7.03 discusses potential mitigation required as a result of increased recreational pressure. It should be clarified that this mitigation is with regard to impacts on designated European conservation sites (SPAs, SACs and Ramsar sites)

New site 3007 Saxmundham sub area (Land to south east of Blythburgh Road)

We agree with the rejection of this site due to the acknowledged potential for impact on the Minsmere-Walberswick SPA, SAC and SSSI.

New site 3024 Saxmundham sub area (Land off Aldringham Road)

We agree with the rejection of this site due to the acknowledged potential impact on the Sandlings SPA and SSSI.

Habitats Regulations Assessment for Site Allocations and Area Specific Policies DPD

Para 2.3.2 states that the assessment of the Suffolk Coastal Core Strategy found no adverse effect on the integrity of any European site. This should be clarified to state that this is dependent on the provision of mitigation to address recreational pressure as a result of housing numbers. Without such mitigation, adverse effects on integrity would result.

Para. 3.3.3 refers to a Green Infrastructure Plan under consideration by Suffolk Coastal District and Ipswich Borough. As stated in our comments above, we consider that this work should be formalised within an SPD.

Para. 3.3.3 also refers to a country park proposed as part of the Adastral Park development. As stated above, there cannot be confidence that the application and its associated green space provision will be realised, as the application is as yet undetermined.

We agree with the assessment in para. 3.4.2 that policies SSP3 Land to the rear of Rose Hill, Saxmundham Road, Aldeburgh and SSP31 Snape Maltings could have a Likely Significant Effect on European sites.

We support the conclusion in para. 3.4.15 that a visitor disturbance study is required for the Alde-Ore Estuary in order to understand possible impacts from Policy SSP31 Snape Maltings. As noted in para. 3.5.1, both the policies resulting in Likely Significant Effect relate to the Alde-Ore Estuary, hence a disturbance study could also aid assessment of SSP3 Land to rear of Rose Hill, Saxmundham Road, Aldeburgh and any future developments close to the estuary.

Para. 3.4.16 refers to the proposed restriction in new car parking around the Deben Estuary and opportunities to apply this policy to other European Sites. We recommend the approach suggested above (see comments on Section 5 -

C - 6811 - 2839 - 6.10 - None

6811 Comment

Tourism and Sea Front activities

6.10

Tourism) for the Deben Estuary, and that consideration should be given to a similar scheme for other European sites (potentially including the Alde-Ore Estuary, dependant on the results of the proposed disturbance study).

We support the statement in para. 3.6.3 that the proposed development of Adastral Park will require its own project level HRA

The discussion of SSP38 Coastal Change Management Area in Appendix 2 Screening of Individual Policies notes that the policy should emphasis that 'large lengths of the coast are European sites or related to European sites, and that Habitats Regulations Assessment is likely to apply to developments affecting these lengths of coast.' We support this recommendation

Felixstowe Peninsula Area Action Plan Preferred Options Document

Para. 2.01 refers to some of the environmental designations which illustrate the importance of the Felixstowe area. Reference to the SPA, which is an international designation, would enhance this.

There appears to be some inconsistency between the AAP and Policy SSP30 Visitor Management - Deben Estuary. Paras. 6.10 and 6.11 discuss access and parking - these should be checked for consistency with the policy. Policy FPP18 Felixstowe Ferry and Golf Course also appears inconsistent with SSP30 in that it seeks to increase parking provision. Note that we have suggested amendments to Policy SSP30 (see our comments on the Site Allocations and Area Specific Policies DPD under Section 5 - Tourism).

Para. 6.10 refers to recreational pressure on the Deben Estuary SPA. It should also be noted that The Knolls (just outside the SPA) are important for breeding little terns, and are also vulnerable to recreational pressure.

Paras. 6.28 - 6.33 could make reference to the breeding birds of the Landguard Common SSSI, particularly ground nesters, as these species are particularly sensitive to recreational disturbance.

Paras. 7.05 - 7.07 discuss the update to the HAGGIS study. Please refer to our comments on the Site Allocations and Area Specific Policies DPD under Section 6 - Recreation and Green Infrastructure above.

Policy FPP25 Access to the Countryside refers to the provision of green infrastructure. We recommend that proposals for green infrastructure which maximise biodiversity benefits should also be encouraged.

We support the rejection of New Site 3028 Land at Manor Terrace as this site is very close to the Landguard Common SSSI and its sensitive plants and breeding birds.

Habitats Regulations Assessment for Felixstowe Peninsula Area Action Plan

We support the recommendation in para. 3.4.3 that Policy FPP10 Port of Felixstowe is expanded to include reference to the potential need for HRA should developments be proposed within or to expand the Port.

We trust that these comments are helpful. If you have any queries about the comments above, please do not hesitate to contact me.

Summary:

There appears to be some inconsistency between the AAP and Policy SSP30 Visitor Management - Deben Estuary. Paras. 6.10 and 6.11 discuss access and parking - these should be checked for consistency with the policy. Para. 6.10 refers to recreational pressure on the Deben Estuary SPA. It should also be noted that The Knolls (just outside the SPA) are important for breeding little terns, and are also vulnerable to recreational pressure.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

RSPB response to preferred options consultation 231115.pdf

O - 6894 - 424 - 6.11 - None

6894 Object

Tourism and Sea Front activities

Respondent: Felixstowe and District Council for Sport and

Recreation (Mr Michael Sharman) [424]

N/A

Full Text: The local sports council is the umbrella for some 35 affiliated local sports clubs with around 5000 sports players.

Its Executive Committee has reviewed the consultation documents and, given that one of the Interim Sustainability Appraisal objectives is "To improve the health of the population overall", it is unanimously appalled that there is no mention whatsoever o sport, recreation and play other than in 6.11 which states "Maintaining the current access to the

6.11

Agent:

water at Felixstowe Ferry is fundamental to the area".

Any increase in the population of Felixstowe and district through additional housing must necessarily be accompanied

by improved opportunities and facilities for sport, recreation and play.

The local sports council (the umbrella for some 35 affiliated local sports clubs) has reviewed the consultation documents Summary:

and, given that one of the Interim Sustainability Appraisal objectives is "To improve the health of the population overall", it is unanimously appalled that there is no mention whatsoever of sport, recreation and play other than in 6.11 which

states "Maintaining the current access to the water at Felixstowe Ferry is fundamental to the area".

Any increase in the population of Felixstowe and district through additional housing must necessarily be accompanied

by improved opportunities and facilities for sport, recreation and play.

Change to Plan

Duty to Cooperate? Soundness Tests Sound? Appear at exam? Legal?

Not Specified Not Specified Not Specified Not Specified None

C - 6990 - 3872 - 6.13 - None

6990 Comment

Tourism and Sea Front activities 6.13

Respondent: Mr Howard Price [3872] Agent: N/A

Full Text: Stronger steps need to be taken to preserve the public footpaths which cross the golf course and which are at risk of

being lost.

Summary: Stronger steps need to be taken to preserve the public footpaths which cross the golf course and which are at risk of

being lost.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6812 - 2839 - Preferred Policy FPP18: Felixstowe Ferry and Golf Course - None

6812 Comment

Tourism and Sea Front activities

Preferred Policy FPP18: Felixstowe Ferry and Golf

Course

Respondent: RSPB (Jacqui Miller) [2839] Agent: N/A

Full Text: Re: Site Allocations and Area Specific Policies - Preferred Options Consultation

Thank you for consulting the RSPB regarding the Preferred Options Consultation. Please find our comments below.

Site Allocations and Area Specific Policies DPD - Preferred Options Consultation Document

Introduction

Paras. 106-107 and Policy SSP1 refer to the planning application at Adastral Park. It should be noted that at this stage, there cannot be confidence that the application and its associated green space provision will be realised, as the application is as yet undetermined. Therefore this project should not be relied upon to provide mitigation for recreational pressure on European sites through the provision of green space for the district as a whole.

SSP3 Land to the rear of Rose Hill, Saxmundham Road, Aldeburgh (SHLAA ref 608)

We have previously raised concerns (in our response of 26th February 2015 to the Issues and Options consultation) about this site regarding its proximity to the Alde-Ore Estuary SPA and Ramsar site, however, this was on the basis of 69-108 houses. A reduction to ten houses plus a care home may reduce concerns, but this restriction should be clearly worded (as an upper limit) into the resulting policy (SSP3). At present it is not clear whether the requirement is for less than ten units (as in the excerpt from the Sustainability Appraisal) or 'around ten' as in para. 2.23. As noted in the Habitats Regulations Assessment (HRA), the status and use of the access route to the estuary should be clarified, and the provision of alternative open space considered. It should be noted that, if an application is brought forward for this site, HRA at the project level will be required, and proposals for mitigation should be included in plans for any development.

We support the rejection of alternative option site 982. We note that Appendix 3 indicates that this site was rejected due to potential effects on the Alde-Ore Estuary SPA (in line with our comments). This should be recognised here.

SSP10 Land west of Garden Square Rendlesham

We support the requirement to provide open space for daily dog walking as an alternative to the more sensitive Tunstall and Rendlesham Forests (part of the Sandlings SPA).

SSP22 Bentwaters Park, Rendlesham

We note that the policy refers to the sensitivities of this site within the AONB. This policy should also recognise that Bentwaters Parks adjoins the Sandlings SPA and is in close proximity to the Alde-Ore Estuary SPA, SAC and Ramsar site. It will be necessary to consider potential effects on these designated wildlife sites when making decisions as to future activities on this site.

Section 5 - Tourism

References to Natura 2000 sites in para. 5.02 should include the Sandlings, as well as the estuaries.

Policy SSP30 proposes a restriction on public car parking within 1km of the Deben Estuary as mitigation against increases in recreational pressure resulting from the in-combination effects of housing proposals in the area. Whilst we support some restrictions on new parking provision, we suggest this should focus on provision relating to activities likely to cause most disturbance and/or locations that are most sensitive to disturbance. Seasonal restrictions could also be considered, based on the presence of sensitive species. We are also concerned that purely restricting access does not encourage responsible behaviour and enjoyment of and respect for the natural environment. We therefore recommend that consideration is given to a range of mitigation measures which could be funded through a formalised developer contributions scheme. The Council should consider those measures proposed in the Deben Estuary Plan, with examples including:

□ seasonally adapted routes including diversions if necessary
□ screening of routes
□ provision of information to visitors - signage, interpretation, community events to educate people about the
importance of the area and responsible visiting
□ gates preventing dogs running ahead
□ bunds and hides etc to screen birds from visitors in sensitive areas
□ managing visitor numbers during busy periods through charging and parking restrictions
□ quidance for dog walkers and river users (e.g. through codes of conduct)
□ a wardening scheme
an ongoing visitor management plan - including provision for monitoring of impacts and review of mitigation

As noted in para. 5.05 of the Site Allocations and Area Specific Policies DPD, this approach should be complemented with provision of areas of attractive alternative green space, including areas suitable for dog walking, within individual

C - 6812 - 2839 - Preferred Policy FPP18: Felixstowe Ferry and Golf Course - None

6812 Comment

Tourism and Sea Front activities

Preferred Policy FPP18: Felixstowe Ferry and Golf Course

development sites.

SSP31 Snape Maltings

While para. 5.06 refers to the conservation importance of the area within which Snape Maltings is set, the policy itself does not. We recommend that the sentence requiring that all proposals should seek to protect and enhance the special character and interest of the heritage assets should be amended to include the natural environment as well.

Section 6 Recreation and Green Infrastructure

We are pleased that the Haven Gateway Green Infrastructure Strategy (HAGGIS) has recently been updated, however, this update does not appear to be available for review. In our previous comments of 26th February 2015 on the Issues and Options consultation, we recommended that the 2011 Green Infrastructure Strategy for the Suffolk Coastal district is also updated. We commented that:

"At present the district Green Infrastructure Strategy appears focused on recreational provision. Whilst important, we consider that there is also an opportunity to expand the Strategy to include biodiversity targets. This should aim to create networks of sites of biodiversity value that 'fill the gaps' between existing green space features and sites of importance for biodiversity. Joined up networks are more functional and allow species to move between sites, helping them to adapt to the likely effects of climate change. We recommend that the currently available maps of priority habitat types are supplemented by map(s) showing designated sites (including international sites, SSSIs and County Wildlife Sites). These maps of current biodiversity resource can then be used to identify those areas which could be targeted for restoration, buffering or linkage through habitat creation or restoration."

RSPB response to Suffolk Coastal District Council Site Allocations and Area Specific Policies Issues and Options Consultation, 26th February 2015

These comments are still relevant. We also recommend that the outputs from the HAGGIS update and an update to the Suffolk Coastal Green Infrastructure Strategy should be consolidated into an SPD setting out a district-wide strategy, alongside standards for green infrastructure provision within developments. The production of an SPD would clarify and formalise requirements and ensure that there is one easily accessible set of targets and standards for the district.

Section 7 - Environment

Para. 7.03 discusses potential mitigation required as a result of increased recreational pressure. It should be clarified that this mitigation is with regard to impacts on designated European conservation sites (SPAs, SACs and Ramsar sites).

New site 3007 Saxmundham sub area (Land to south east of Blythburgh Road)

We agree with the rejection of this site due to the acknowledged potential for impact on the Minsmere-Walberswick SPA, SAC and SSSI.

New site 3024 Saxmundham sub area (Land off Aldringham Road)

We agree with the rejection of this site due to the acknowledged potential impact on the Sandlings SPA and SSSI.

Habitats Regulations Assessment for Site Allocations and Area Specific Policies DPD

Para 2.3.2 states that the assessment of the Suffolk Coastal Core Strategy found no adverse effect on the integrity of any European site. This should be clarified to state that this is dependent on the provision of mitigation to address recreational pressure as a result of housing numbers. Without such mitigation, adverse effects on integrity would result.

Para. 3.3.3 refers to a Green Infrastructure Plan under consideration by Suffolk Coastal District and Ipswich Borough. As stated in our comments above, we consider that this work should be formalised within an SPD.

Para. 3.3.3 also refers to a country park proposed as part of the Adastral Park development. As stated above, there cannot be confidence that the application and its associated green space provision will be realised, as the application is as yet undetermined.

We agree with the assessment in para. 3.4.2 that policies SSP3 Land to the rear of Rose Hill, Saxmundham Road, Aldeburgh and SSP31 Snape Maltings could have a Likely Significant Effect on European sites.

We support the conclusion in para. 3.4.15 that a visitor disturbance study is required for the Alde-Ore Estuary in order to understand possible impacts from Policy SSP31 Snape Maltings. As noted in para. 3.5.1, both the policies resulting in Likely Significant Effect relate to the Alde-Ore Estuary, hence a disturbance study could also aid assessment of SSP3 Land to rear of Rose Hill, Saxmundham Road, Aldeburgh and any future developments close to the estuary.

Para. 3.4.16 refers to the proposed restriction in new car parking around the Deben Estuary and opportunities to apply this policy to other European Sites. We recommend the approach suggested above (see comments on Section 5 -

C - 6812 - 2839 - Preferred Policy FPP18: Felixstowe Ferry and Golf Course - None

6812 Comment

Tourism and Sea Front activities

Preferred Policy FPP18: Felixstowe Ferry and Golf Course

Tourism) for the Deben Estuary, and that consideration should be given to a similar scheme for other European sites (potentially including the Alde-Ore Estuary, dependant on the results of the proposed disturbance study).

We support the statement in para. 3.6.3 that the proposed development of Adastral Park will require its own project level HRA

The discussion of SSP38 Coastal Change Management Area in Appendix 2 Screening of Individual Policies notes that the policy should emphasis that 'large lengths of the coast are European sites or related to European sites, and that Habitats Regulations Assessment is likely to apply to developments affecting these lengths of coast.' We support this recommendation

Felixstowe Peninsula Area Action Plan Preferred Options Document

Para. 2.01 refers to some of the environmental designations which illustrate the importance of the Felixstowe area. Reference to the SPA, which is an international designation, would enhance this.

There appears to be some inconsistency between the AAP and Policy SSP30 Visitor Management - Deben Estuary. Paras. 6.10 and 6.11 discuss access and parking - these should be checked for consistency with the policy. Policy FPP18 Felixstowe Ferry and Golf Course also appears inconsistent with SSP30 in that it seeks to increase parking provision. Note that we have suggested amendments to Policy SSP30 (see our comments on the Site Allocations and Area Specific Policies DPD under Section 5 - Tourism).

Para. 6.10 refers to recreational pressure on the Deben Estuary SPA. It should also be noted that The Knolls (just outside the SPA) are important for breeding little terns, and are also vulnerable to recreational pressure.

Paras. 6.28 - 6.33 could make reference to the breeding birds of the Landguard Common SSSI, particularly ground nesters, as these species are particularly sensitive to recreational disturbance.

Paras. 7.05 - 7.07 discuss the update to the HAGGIS study. Please refer to our comments on the Site Allocations and Area Specific Policies DPD under Section 6 - Recreation and Green Infrastructure above.

Policy FPP25 Access to the Countryside refers to the provision of green infrastructure. We recommend that proposals for green infrastructure which maximise biodiversity benefits should also be encouraged.

We support the rejection of New Site 3028 Land at Manor Terrace as this site is very close to the Landguard Common SSSI and its sensitive plants and breeding birds.

Habitats Regulations Assessment for Felixstowe Peninsula Area Action Plan

We support the recommendation in para. 3.4.3 that Policy FPP10 Port of Felixstowe is expanded to include reference to the potential need for HRA should developments be proposed within or to expand the Port.

We trust that these comments are helpful. If you have any queries about the comments above, please do not hesitate to contact me.

Summary:

Policy FPP18 Felixstowe Ferry and Golf Course also appears inconsistent with SSP30 in that it seeks to increase parking provision. Note that we have suggested amendments to Policy SSP30 (see our comments on the Site Allocations and Area Specific Policies DPD under Section 5 - Tourism).

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

RSPB response to preferred options consultation 231115.pdf

C - 7056 - 2600 - Preferred Policy FPP18: Felixstowe Ferry and Golf Course - None

7056 Comment

Tourism and Sea Front activities

Preferred Policy FPP18: Felixstowe Ferry and Golf

Respondent: Deben Estuary Partnership (Christine Block) [2600] Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Preferred Options Consultation Document

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Tourism and Sea Front Activities Felixstowe Ferry and Golf Course

- * In the context of the Felixstowe Peninsula Area Action Plan objective 'to reduce vulnerability to flooding' the section relating to Felixstowe Ferry makes no reference to the substantial flood defence management issues which affect the mouth of the Deben Estuary and, therefore, the future of this area including the Ferry hamlet.

 This could be addressed by referring to the Deben Estuary Plan Estuary Policy Areas Flood Defence Management Page 26 Felixstowe Ferry Estuary Defence
- * This section makes no reference to the seasonal foot ferry between Felixstowe Ferry and Bawdsey Ferry. This is favoured by tourists (22,000 passengers in 2015). It provides important access to the internationally significant Radar Museum at Bawdsey Manor, offers a link in the net work of national cycle trails and will be important as part of the national coastal trail.

Page 76 Environment

7.01 'minimising the impact of new development on sites identified as internationally important for nature conservation 'Justification for minimising and mitigating the impact of new development should not only consider designated sites but include reference to conserving and enhancing the landscape and characteristic features of the Deben Estuary, valuing the landscape of the Felixstowe Peninsula as seen from the river, ensuring that new build is sensitive to the estuary topography and lessening light pollution in areas where lights will be visible from across a wide estuary area. (The quality of the landscape, the biodiversity and 'peace and tranquillity' of the estuary environment are recognised as one of the main reasons visitors choose to stay in the area.)

7.02 Reference to importance of high quality agricultural land to the north of Felixstowe. The importance lies not so much in the grade of land but in the combination of light soils, mild climate and access to irrigation which allows early and late vegetable cropping - now of national importance.

7.03 Reference to mitigating the impact of future development - targeted mitigation measures are also noted in the Deben Estuary Plan. Disturbance of the hinterland feeding and roosting areas of the species listed in connection with SPA / RAMSAR designations - ie behind the intertidal estuary - may also require mitigation.

Page 84

Other issues

* The area covered by the Felixstowe Peninsula Area Action Plan includes a section of the Deben Estuary but no mention is made to the significant flood defence issues which apply to the mouth and lower reaches of the river. This could be addressed by referring to the Deben Estuary Plan.

Page 93

Saved policies

AP 191 Felixstowe: Houseboats at Felixstowe

- * The Deben Estuary Plan notes the character that houseboats bring to parts of the river but puts forward guidelines which aim to establish common criteria across the whole estuary.. At the moment policies cover Felixstowe / Melton / and Woodbridge but ignore houseboats at Martlesham Creek.
- * Under 'How these policy issues are now being dealt with' reference should be made to the endorsed Deben Estuary

Summary:

In the context of the Felixstowe Peninsula Area Action Plan objective 'to reduce vulnerability to flooding' - the section relating to Felixstowe Ferry makes no reference to the substantial flood defence management issues which affect the mouth of the Deben Estuary - and, therefore, the future of this area - including the Ferry hamlet.

This could be addressed by referring to the Deben Estuary Plan-Estuary Policy Areas-Flood Defence Management-Page 26-Felixstowe Ferry-Estuary Defence

Change to Plan

This section makes no reference to the seasonal foot ferry between Felixstowe Ferry and Bawdsey Ferry. This is favoured by tourists (22,000 passengers in 2015). It provides important access to the internationally significant Radar Museum at Bawdsey Manor, offers a link in the net work of national cycle trails and will be important as part of the national coastal trail.

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

S - 7148 - 744 - Preferred Policy FPP18: Felixstowe Ferry and Golf Course - None

7148 Support

Tourism and Sea Front activities

Preferred Policy FPP18: Felixstowe Ferry and Golf

Course

Respondent: Historic England (Sir/ Madam) [744] Agent: N/A

Full Text: Re: Preferred Options Public Consultation (19th October - 30th November 2015)

Felixstowe Peninsula Area Action Plan

Thank you for your letter dated 15th October 2015 regarding the above consultation. We have had the opportunity to assess the letter and consultation documents and can offer the following. Please note we have provided comments on the Site Allocations and Area Specific Policies within a separate letter to you dated the same. This follows a previous consultation and our comments dated 25th February 2015.

In terms of our general comments:

Recent Guidance from Historic England

We have recently published guidance on the Historic Environment and Site Allocations. Where we have not made comment below some additional guidance on ensuring a positive strategy for the historic environment is secured within the Felixstowe Area Action Plan can be seen by following this link- http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/.

In terms of our site specific comments:

Housing Sites

FPP4: Land north of Walton High Street, Felixstowe (451g)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the possible impact on the setting of two Listed Buildings, Grade II* Listed Walton Hall and Grade II Listed 362 High Street. We highlighted that the principal elevation of Walton Hall faces north and overlooks site 451g. It was considered that development here would urbanise the setting of this important, highly designated heritage asset, resulting in harm to its significance. It was expressed that harm would also be caused to the Grade II lodge and we strongly advised that an alternative site was found for development, though it was thought that there may be scope for some limited development at the eastern end of this site. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. The policy does however highlight that the development will need to be sympathetic to the Listed Buildings found at Walton Hall and 362 High Street. Whilst this would go some way to allay our concerns we still recommend that whilst it is considered the site can take a level of development there would be a detrimental harm to the setting of the Listed Buildings if the whole site is developed. If the site is to remain in the plan we would advise that the western end of the site is left relatively undeveloped to help protect the setting and it is considered that this side of the site might lend itself to fulfil the Public Open Space requirement.

FFP5: Land north of Conway Close, Felixstowe (502e)

We welcome the acknowledgment of the Listed Buildings and the requirement that development will need to be sympathetic to the Listed Buildings within the policy. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FFP6: Land opposite Hand in Hand Public House, Trimley St Martin (451b)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of two Grade II Listed Buildings (the Hand in Hand public house and Nos 251 and 253 High Road). We highlighted that both these buildings are traditional vernacular structures that date back to the agrarian origins of the village, and their current proximity to open countryside contributes to their setting and significance. We therefore encouraged the Local Planning Authority to identify alternative sites if at all possible so that the setting of these two buildings might be protected. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. However, it is also acknowledged that the policy requires a village green to be included within the scheme. The village green is to front High Road in order to reduce the impact on the setting of the Hand in Hand public house and this is particularly welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP7: Land off Howlett Way, Trimley St Martin (451c and 451d)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of the two Grade II listed churches and the Grade II listed Old Rectory. Whilst it is acknowledged that the consideration of the setting of the rectory is included within the policy, and this is welcomed, we would advise that the setting of the churches is also included. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP8: Land off Thurmans Lane, Trimley St Mary (383f and 451f)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of Grade II Listed Building Mill Farmhouse. It is acknowledged that there is a requirement in the policy that the development will need to be sympathetic to the setting of the mill and this is welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

Town Centre

FFP14: Felixstowe Town Centre and FFP15: Retail Frontages

As outlined within our response to you dated 25th February 2015 it is considered these policies should cover

S - 7148 - 744 - Preferred Policy FPP18: Felixstowe Ferry and Golf Course - None

7148 Support

Tourism and Sea Front activities

Preferred Policy FPP18: Felixstowe Ferry and Golf

conservation and design issues. It is considered the policies should highlight the importance of retaining or restoring historic shopfront features both in terms of the positive contribution historic shopfronts make to the character of an area but also the economic benefit of providing traditional and bespoke shopping units to shopowners. A good example of how historic shopfronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a National success. The council have also seen a ripple effect of surrounding properties being restored. As well as including conservation and design issues within these policies the Council could consider additional advice within a Supplementary Planning Guide on Historic Shopfronts, especially given the importance and contribution the Historic shopping areas within the settlements of Suffolk make to the wider area.

District Centres

FPP17: District Centres

As above it is considered that this policy should cover conservation and design issues. It should highlight the contribution the Historic Environment makes to the economic success of district centres and seek to protect and enhance both the setting of historic assets and assets themselves.

Tourism and Sea Front Activities

We welcome the inclusion of a section which covers tourism and seafront activities. It is considered that point 6.03 on page 61 could also acknowledge and highlight the wider and more general positive contribution to Felixstowe that heritage tourism brings.

FFP18: Felixstowe Ferry and Golf Course, FFP19: Felixstowe Ferry Golf Club to Cobbolds Point, FPP20: Cobbolds Point to Spa, FPP21: Spa to Martello Park and FFP22 Martello Park to Landguard We welcome and support the acknowledgement and required protection of the historic qualities of these sections of the coast

FPP23: Car Parking

We welcome the 'high quality of design' requirement relating to replacement car parking at point 6.36 on page 72. It is considered that this requirement should be included within the policy itself to give it more weight in decision making.

The Environment

We welcome the inclusion of a section on the Historic Environment which sits separately from landscape and ecological elements. We also welcome the section on Locally Listed Buildings and Features. It is considered the Historic Environment section should also highlight Felixstowe's archaeology.

It is acknowledged that no individual policies on the Historic Environment are proposed for the Area Action Plan itself, relying instead on saved policies within the Core Strategy and the National Planning Policy Framework. The Core Strategy does not have a specific historic environment policy, with certain aspects covered in other policies such as SP15 (Landscape and Townscape) and DM21 (Design Aesthetics) and policies for specific settlements. It is considered that there is a lack of a clear strategy relating to the Historic Environment, relating to local issues, at present, and we would encourage greater clarity. This should set out the Council's approach to the management of designated and non-designated heritage assets (including archaeology) and how issues such as heritage at risk will be tackled. It is considered that a Historic Environment Policy could be locally specific to cover the Felixstowe Peninsula Area Action Plan.

In addition to the above it is acknowledged that the issue of Felixstowe South Conservation Area At Risk is not being covered by the Plan. We therefore reiterate our previous comments as follows, it would be advantageous if the Area Action Plan identified specific policies to help remove it from the register. These might include utilising the conservation area appraisal to identify locally important buildings that contribute positively to the conservation area, and introduction Article 4 directives to protect such buildings. There may also be sites which are considered negative contributors to the character and appearance of the conservation area and the preparation of development briefs for such sites might help bring forward positive redevelopment. The conservation area survey identified the loss of architectural detail as a significant problem, and consideration might therefore be given to applying to the Heritage Lottery Fund for a Townscape Heritage programme for the area, or a smaller partnership scheme with Historic England to reinstate lost architectural details on key buildings. We would therefore still recommend the inclusion of a policy which tackles the issues at Felixstowe South Conservation Area.

FPP26: Areas to be Protected from Development

In our response to you dated 25th February 2015 we expressed concerns regard the inclusion of all the sites in Trimley St Martin which would in effect surround a number of Listed Buildings including Grade II listed churches, the Grade II listed Old Rectory and Grade II Listed Building Mill Farmhouse. We recommended the inclusion of an area to be protected from development which would protect the remaining green wedge and as a result protect the setting of a number of Listed Buildings. It is acknowledged that the green wedge within Trimley St Martin is proposed to be included within the Areas to be Protected from Development and this is particularly welcomed and supported.

FPP27: Historic Park and Garden

We welcome the inclusion and the content of this policy.

S - 7148 - 744 - Preferred Policy FPP18: Felixstowe Ferry and Golf Course - None

7148 Support

Tourism and Sea Front activities

Preferred Policy FPP18: Felixstowe Ferry and Golf

Other Issues

Coastal Change Management and Areas of Flooding

We welcome the inclusion of this section. It is considered this section should also contain a paragraph on issues and opportunities of climate change and flooding relating to the Historic Environment. Further guidance on flooding issues can be found here- http://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/.

For information and for further policy consultation please note our new consultation email address for the East of England, eastplanningpolicy@HistoricEngland.org.uk.

Summary: We welcome

We welcome and support the acknowledgement and required protection of the historic qualities of these sections of the

coast.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

C - 7348 - 2516 - Preferred Policy FPP18: Felixstowe Ferry and Golf Course - None

7348 Comment

Tourism and Sea Front activities

Preferred Policy FPP18: Felixstowe Ferry and Golf

Course

Respondent: Natural England (Sir/ Madam) [2516] Agent: N/A

Full Text: Planning consultation: Preferred Options Public Consultation

Site Allocations and Area Specific Policies; Felixstowe Peninsula Area Action Plan

Thank you for your consultation on the above which was received by Natural England on 19 October 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.

WILDLIFE AND COUNTRYSIDE ACT 1981 (AS AMENDED)

CONSERVATION OF HABITATS & SPECIES REGULATIONS 2010 (AS AMENDED)

Site Allocations and Area Specific Policies Development Plan Document

Preferred Options Consultation Document (October 2015)

Preferred Option Policy SSP1: New Housing Delivery 2015 - 2027

We note the requirement for new housing delivery to meet, as a minimum, the Core Strategy requirement for 7,900 homes over the period 2010 - 2027.

Preferred Option SSP3 - Land rear of Rose Hill, Saxmundham Road Aldeburgh

The policy allocates 3ha of land at this location for the provision of a care home plus ten residential units. The site is about 300m from Alde-Ore Estuary Special Protection Area (SPA)/Ramsar site and Alde-Ore and Butley Estuaries Special Area of Conservation (SAC). The avoidance of strategic housing proposals at Martlesham and at Felixstowe Peninsula within 1km of the Deben Estuary and

Orwell Estuary respectively has been proposed as mitigation in part for adverse effects arising from increased recreational disturbance. Preferred Option SSP3 is within 1km of the Alde-Ore Estuary and therefore we advise that it would be required to have a Habitats Regulations Assessment at the application stage.

The Preferred Option is within Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). We note the requirements for design to take account of the sensitive landscape context of the development and advise that a Landscape and Visual Assessment (LVIA) would be required at the application stage. In summary, further detailed information will be required to assess the environmental impact of the proposed policy at this location.

Preferred Option SSP18 Ransomes, Nacton Heath (around 30 hectares)

The potential development within the AONB has significant landscape and visual impacts. We note that potential mitigation is stated to include de-designation of AONB land, rationalising existing AONB boundary and/or high quality design of buildings, structures and setting to reduce landscape impacts and impacts on potential historic interests. We advise that the policy should not rely on the

boundary of the AONB being amended. For clarity, it is Natural England's statutory responsibility to determine the designation of AONBs or to review existing AONB boundaries. For further information, please see following a link to our Designations Strategy:

http://publications.naturalengland.org.uk/publication/2647412.

However, we support the proposal for a development brief to be prepared by the District Council toprovide detailed planning guidance for the whole area, covering both the former employment allocation and the AONB element to allow for a more flexible approach to be progressed.

Preferred Option SSP30 Visitor Management - Deben Estuary

We agree with the policy to prevent increased recreational disturbance of Deben Estuary by preventing any additional car parking provision within a 1km distance of the estuary and by requiring proposed improvements to existing access points which would result in an increased level of recreational activity on the estuary to demonstrate that they will not result in any "significant effect" either on their own or in combination with other uses.

Preferred Option SSP31 Snape Maltings (replaces policy AP166)

The policy promotes the use of Snape Maltings for arts, recreation, and tourism-related uses. Snape Maltings is within Suffolk Coast and Heaths AONB and is adjacent to Alde-Ore Estuary SPA/Ramsar site and Alde-Ore and Butley Estuaries SAC. Proposals at this location will be required to demonstrate that they will not have an adverse impact on the protected landscape and designated sites and may require a Habitats Regulations Assessment and/or LVIA at application stage.

Habitats Regulations Assessment

We agree with the screening exercise carried out by the HRA that Preferred Options SSP3 (Land rear of Rose Hill, Saxmundham Road Aldeburgh) and SSP31 (Snape Maltings) are likely to have a significant effect on internationally designated sites. We note that the HRA advises that a study of existing visitor disturbance to birds, looking at the amount and origin of visitor activity as well as the birds' response is required for the vicinity of Snape Maltings; we agree

C - 7348 - 2516 - Preferred Policy FPP18: Felixstowe Ferry and Golf Course - None

7348 Comment

Tourism and Sea Front activities

Preferred Policy FPP18: Felixstowe Ferry and Golf

with the requirement for further evidence to inform a detailed assessment of this option.

We agree with the conclusion of the HRA (see section 5.1.1) which states that 'Site Allocation Document as a standalone document is likely to have a significant effect upon Alde-Ore Estuary European sites, with Preferred Policies SSP3 (land to the rear of Rose Hill, Saxmundham Road, Aldeburgh) and SSP31 (Snape Maltings) likely to have a significant effect by causing an increase in

disturbance to SPA-qualifying birds using the estuary'. However, we are unable to conclude no adverse effect on integrity of European sites from the subsequent statement that 'For both policies, further information and / or study might be able to inform a subsequent conclusion of no adverse effect upon the integrity of the European site' as this is not definite. We advise that either a rewording of the policies and/or further detailed assessment, including potential mitigation

measures, is required to enable us to have confidence in a conclusion of no adverse effect on integrity of European sites from these Preferred Options. We would be happy to give you further advice in this respect.

We support Preferred Option SSP30 (Visitor Management - Deben Estuary) regarding proposed improvements to access points such as slipways or jetties which may result in an increased level of recreational activity on the estuary needing to demonstrate that the proposal would not result in a likely significant effect on the notified features of the international site.

We note that the HRA states that mitigation for 'in combination' effects of new housing proposed in the Suffolk Coastal Core Strategy is being taken forward (section 3.3.3). In particular, we note that a Green Infrastructure plan is being considered by Suffolk Coastal District and Ipswich Borough to address the visitor management measures. In line with our current advice, we advise that this is not

sufficient to give confidence that the required mitigation measures will be delivered. There needs to be a commitment to having a mitigation strategy in place, informed by the green infrastructure plan, ideally by the time the plan is adopted or by a specified timescale shortly after the plan is adopted.

We advise this is necessary to give certainty that the mitigation measures will be delivered to ensure the plan is compliant with the Habitats Regulations and with paragraphs 113 and 118 of the NPPF.

We therefore suggest the following rewording:

'The Council will produce a mitigation strategy by {INSERT DATE} which will specify the measures required and how these will be delivered and funded'

Felixstowe Peninsula Area Action Plan

Preferred Options Consultation Document (October 2015)

Preferred Policy FPP1: Housing

We note that the Felixstowe Peninsula AAP identifies the requirement for 1,100 new dwellings on the preferred sites outlined in the document.

Preferred Policy FPP10: Port of Felixstowe

The policy promotes and safeguards land for employment, activities and operations which support the retention, expansion and consolidation of the Port of Felixstowe and the jobs associated with the Port. The expansion of the Port may have an impact on internationally designated sites. Please see our comments in Habitats Regulations Assessment below.

Preferred Policy FPP18: Felixstowe Ferry and Golf Course

We note that public access along the sea wall is to be retained within this area to ensure that sustainable links and connections are provided to maintain the unique character of the community and reduce the dominance of the motor car in this area. Please see our comments on England Coast Path below.

Preferred Policy FPP22: Martello Park to Landguard

We support the requirement for any future redevelopment of the port in this area to be carefully considered with the Landguard Partnership to ensure that the favourable condition of Landguard Common Site of Special Scientific Interest (SSSI) is maintained.

Preferred Policy FPP25: Access to the countryside

We support the policy which states that proposals which provide for the provision of green infrastructure in the Felixstowe Peninsula will be encouraged where these are well related to existing communities, offer good accessibility, connected to existing provision and provide alternative and accessible natural green space opportunities. We agree that proposals for new residential development in the Felixstowe Peninsula will be required to make provision of accessible natural green spaces as agreed by the District Council in conjunction with Natural England.

Habitats Regulations Assessment

We agree with the screening of the HRA which identified that Preferred Policy FPP10: (Port of Felixstowe) may have a likely significant effect on Stour and Orwell Estuaries SPA/Ramsar site as it stands. We agree with the conclusions of the HRA (see section 5.1.3) that the policy needs rewording to include a requirement for a Habitats Regulation Assessment to be provided in connection with proposals for expansion of Port of Felixstowe. We would be happy to give you

C - 7348 - 2516 - Preferred Policy FPP18: Felixstowe Ferry and Golf Course - None

7348 Comment

Tourism and Sea Front activities

Preferred Policy FPP18: Felixstowe Ferry and Golf

further advice in this respect.

We note that the HRA states that mitigation for 'in combination' effects of new housing proposed in the Suffolk Coastal Core Strategy is being taken forward (section 3.3.3). Please see our comments for the Site Allocations and Area Specific Policies Development Plan Document HRA above.

England Coast Path

We would appreciate the opportunity to discuss the requirements of the England Coast Path (ECP) with you in order to ensure that the requirements of the Coast Path and any mitigation measures arising from it, are clearly distinguished from any mitigation that might be required from the Council's proposed allocations. For more information on ECP, please see our website as follows:

https://www.gov.uk/government/collections/england-coast-path-improving-public-access-to-thecoast.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

Summary:

We note that public access along the sea wall is to be retained within this area to ensure that sustainable links and connections are provided to maintain the unique character of the community and reduce the dominance of the motor car in this area.

We would appreciate the opportunity to discuss the requirements of the England Coast Path (ECP) with you in order to ensure that the requirements of the Coast Path and any mitigation measures arising from it, are clearly distinguished from any mitigation that might be required from the Council's proposed allocations.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

168976_168977 Preferred Options Consultation Felixstowe Peninsula AAP $_$ Site Specific Allocations_Redacted.pdf

S - 6929 - 3854 - Preferred Policy FPP19: Felixstowe Ferry Golf Club to Cobbolds Point - None

6929 Support

Tourism and Sea Front activities Preferred Policy FPP19: Felixstowe Ferry Golf Club to

Cobbolds Point

Respondent: Mr Michael Florey [3854] Agent: N/A

Full Text: Excellent policy

Summary: Excellent policy

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

S - 7149 - 744 - Preferred Policy FPP19: Felixstowe Ferry Golf Club to Cobbolds Point - None

7149 Support

Tourism and Sea Front activities

Preferred Policy FPP19: Felixstowe Ferry Golf Club to Cobbolds Point

Respondent: Historic England (Sir/ Madam) [744] Agent: N/A

Full Text: Re: Preferred Options Public Consultation (19th October - 30th November 2015)

Felixstowe Peninsula Area Action Plan

Thank you for your letter dated 15th October 2015 regarding the above consultation. We have had the opportunity to assess the letter and consultation documents and can offer the following. Please note we have provided comments on the Site Allocations and Area Specific Policies within a separate letter to you dated the same. This follows a previous consultation and our comments dated 25th February 2015.

In terms of our general comments:

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We have recently published guidance on the Historic Environment and Site Allocations. Where we have not made comment below some additional guidance on ensuring a positive strategy for the historic environment is secured within the Felixstowe Area Action Plan can be seen by following this link- http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/.

In terms of our site specific comments:

Housing Sites

FPP4: Land north of Walton High Street, Felixstowe (451g)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the possible impact on the setting of two Listed Buildings, Grade II* Listed Walton Hall and Grade II Listed 362 High Street. We highlighted that the principal elevation of Walton Hall faces north and overlooks site 451g. It was considered that development here would urbanise the setting of this important, highly designated heritage asset, resulting in harm to its significance. It was expressed that harm would also be caused to the Grade II lodge and we strongly advised that an alternative site was found for development, though it was thought that there may be scope for some limited development at the eastern end of this site. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. The policy does however highlight that the development will need to be sympathetic to the Listed Buildings found at Walton Hall and 362 High Street. Whilst this would go some way to allay our concerns we still recommend that whilst it is considered the site can take a level of development there would be a detrimental harm to the setting of the Listed Buildings if the whole site is developed. If the site is to remain in the plan we would advise that the western end of the site is left relatively undeveloped to help protect the setting and it is considered that this side of the site might lend itself to fulfil the Public Open Space requirement.

FFP5: Land north of Conway Close, Felixstowe (502e)

We welcome the acknowledgment of the Listed Buildings and the requirement that development will need to be sympathetic to the Listed Buildings within the policy. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FFP6: Land opposite Hand in Hand Public House, Trimley St Martin (451b)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of two Grade II Listed Buildings (the Hand in Hand public house and Nos 251 and 253 High Road). We highlighted that both these buildings are traditional vernacular structures that date back to the agrarian origins of the village, and their current proximity to open countryside contributes to their setting and significance. We therefore encouraged the Local Planning Authority to identify alternative sites if at all possible so that the setting of these two buildings might be protected. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. However, it is also acknowledged that the policy requires a village green to be included within the scheme. The village green is to front High Road in order to reduce the impact on the setting of the Hand in Hand public house and this is particularly welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP7: Land off Howlett Way, Trimley St Martin (451c and 451d)

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FPP8: Land off Thurmans Lane, Trimley St Mary (383f and 451f)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of Grade II Listed Building Mill Farmhouse. It is acknowledged that there is a requirement in the policy that the development will need to be sympathetic to the setting of the mill and this is welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

Town Centre

FFP14: Felixstowe Town Centre and FFP15: Retail Frontages

As outlined within our response to you dated 25th February 2015 it is considered these policies should cover

S - 7149 - 744 - Preferred Policy FPP19: Felixstowe Ferry Golf Club to Cobbolds Point - None

7149 Support

Tourism and Sea Front activities

Preferred Policy FPP19: Felixstowe Ferry Golf Club to Cobbolds Point

conservation and design issues. It is considered the policies should highlight the importance of retaining or restoring historic shopfront features both in terms of the positive contribution historic shopfronts make to the character of an area but also the economic benefit of providing traditional and bespoke shopping units to shopowners. A good example of how historic shopfronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a National success. The council have also seen a ripple effect of surrounding properties being restored. As well as including conservation and design issues within these policies the Council could consider additional advice within a Supplementary Planning Guide on Historic Shopfronts, especially given the importance and contribution the Historic shopping areas within the settlements of Suffolk make to the wider area.

District Centres

FPP17: District Centres

As above it is considered that this policy should cover conservation and design issues. It should highlight the contribution the Historic Environment makes to the economic success of district centres and seek to protect and enhance both the setting of historic assets and assets themselves.

Tourism and Sea Front Activities

We welcome the inclusion of a section which covers tourism and seafront activities. It is considered that point 6.03 on page 61 could also acknowledge and highlight the wider and more general positive contribution to Felixstowe that heritage tourism brings.

FFP18: Felixstowe Ferry and Golf Course, FFP19: Felixstowe Ferry Golf Club to Cobbolds Point, FPP20: Cobbolds Point to Spa, FPP21: Spa to Martello Park and FFP22 Martello Park to Landguard We welcome and support the acknowledgement and required protection of the historic qualities of these sections of the coast.

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We welcome the 'high quality of design' requirement relating to replacement car parking at point 6.36 on page 72. It is considered that this requirement should be included within the policy itself to give it more weight in decision making.

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It is acknowledged that no individual policies on the Historic Environment are proposed for the Area Action Plan itself, relying instead on saved policies within the Core Strategy and the National Planning Policy Framework. The Core Strategy does not have a specific historic environment policy, with certain aspects covered in other policies such as SP15 (Landscape and Townscape) and DM21 (Design Aesthetics) and policies for specific settlements. It is considered that there is a lack of a clear strategy relating to the Historic Environment, relating to local issues, at present, and we would encourage greater clarity. This should set out the Council's approach to the management of designated and non-designated heritage assets (including archaeology) and how issues such as heritage at risk will be tackled. It is considered that a Historic Environment Policy could be locally specific to cover the Felixstowe Peninsula Area Action Plan.

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FPP26: Areas to be Protected from Development

In our response to you dated 25th February 2015 we expressed concerns regard the inclusion of all the sites in Trimley St Martin which would in effect surround a number of Listed Buildings including Grade II listed churches, the Grade II listed Old Rectory and Grade II Listed Building Mill Farmhouse. We recommended the inclusion of an area to be protected from development which would protect the remaining green wedge and as a result protect the setting of a number of Listed Buildings. It is acknowledged that the green wedge within Trimley St Martin is proposed to be included within the Areas to be Protected from Development and this is particularly welcomed and supported.

FPP27: Historic Park and Garden

We welcome the inclusion and the content of this policy.

S - 7149 - 744 - Preferred Policy FPP19: Felixstowe Ferry Golf Club to Cobbolds Point - None

7149 Support

Tourism and Sea Front activities

Preferred Policy FPP19: Felixstowe Ferry Golf Club to Cobbolds Point

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For information and for further policy consultation please note our new consultation email address for the East of

England, eastplanningpolicy@HistoricEngland.org.uk.

Summary: We welcome and support the acknowledgement and required protection of the historic qualities of these sections of the

coast.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

C - 6992 - 3872 - 6.19 - None

6992 Comment

Tourism and Sea Front activities 6.19

Respondent: Mr Howard Price [3872] Agent: N/A

Full Text: The character of the stretch of promenade between Cobbolds point and the Bath Hotel would be enhanced, and a

stronger link maintained with the promenade further to the SW if the multi-coloured lighting were extended to the foot of

Maybush Lane.

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stronger link maintained with the promenade further to the SW if the multi-coloured lighting were extended to the foot of

Maybush Lane

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

S - 7150 - 744 - Preferred Policy FPP20: Cobbolds Point to Spa - None

7150 Support

Tourism and Sea Front activities

Preferred Policy FPP20: Cobbolds Point to Spa

Respondent: Historic England (Sir/ Madam) [744] Agent: N/A

Full Text: Re: Preferred Options Public Consultation (19th October - 30th November 2015)

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S - 7150 - 744 - Preferred Policy FPP20: Cobbolds Point to Spa - None

7150 Support

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FPP27: Historic Park and Garden

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S - 7150 - 744 - Preferred Policy FPP20: Cobbolds Point to Spa - None

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Tourism and Sea Front activities

Preferred Policy FPP20: Cobbolds Point to Spa

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coast.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

C - 6993 - 3872 - 6.24 - None

6993 Comment

Tourism and Sea Front activities 6.24

Respondent: Mr Howard Price [3872] Agent: N/A

Full Text: It is difficult to reconcile the proposal to redevelop the car park at the bottom of Convalescent Hill with the comment in

the preceding paragraph about the pressures on car parking in this area, moreover if a successful commercial use is

expected from the vacated Council Offices nearby. It also appears contrary to preferred policy Fpp23.

Summary: It is difficult to reconcile the proposal to redevelop the car park at the bottom of Convalescent Hill with the comment in

the preceding paragraph about the pressures on car parking in this area, moreover if a successful commercial use is

expected from the vacated Council Offices nearby. It also appears contrary to preferred policy Fpp23.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6775 - 3060 - Preferred Policy FPP21: Spa to Martello Park - None

6775 Comment

Tourism and Sea Front activities

Preferred Policy FPP21: Spa to Martello Park

Respondent: Felixstowe Town Council (Mr Ash Tadjrishi) [3060] Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Preferred Options Consultation

Thank you for the opportunity to respond to the Suffolk Coastal District Council Felixstowe Peninsula Area Action Plan Preferred Options paper. The Town Council considered this matter at its meeting of 11 November 2015.

Felixstowe Town Council was pleased to welcome and endorse the Felixstowe Peninsula Area Action Plan Preferred Options, subject to the following comments:

Page 13, Para. 2.02

We recommend adding the following to the end of the final sentence of this paragraph: ", as required by the July 2013 Local Plan."

Page 24, FPP3

Remove "(for residents and visitors)" from the bottom bullet relating to appropriate parking provision.

Page 26, Para. 3.30

This paragraph has been reduced in scope from an earlier draft and no longer references the unique location this site holds as a gateway to Felixstowe. It is vital that the policy ensures that any proposals for development of this site include appropriate consideration for this gateway and the statement this makes to those arriving to Felixstowe by road.

Page 27, FPP4

Remove "and Candlet Road" from the first bullet point. Any business units for this site should be restricted to the land adjacent to the A14 Dock Spur only.

Page 27, Title of 3.39

The title should read "Land" rather than "Lane" and include Swallow Close.

Page 29, FPP5

Please include Swallow Close and refer to this site as the "Land north of Conway Close and Swallow Close" throughout.

Page 49, Para. 5.06

Given the latest available information on these sites, this paragraph should be removed.

Page 50, Inset Map

The secondary shopping frontage should continue along Bent Hill on both sides of the road. It should also include the frontage of Trinity Methodist Church on Hamilton Road for consistency. Likewise the primary shopping area shaded in green should include this same section.

Page 51, Para. 5.10

Sentence should end "other than town centre uses".

Page 51, Para. 5.12

Please amend the final two sentences to read as follows:

"The scheme was not completed between Orwell Road and Bent Hill and the AAP will seek to encourage the continuation of the Shared Space along Hamilton Road. The completion of this scheme within the town centre boundary will provide a continuous link between Hamilton Road and Bent Hill and reinforce the connections between the town centre and the sea front."

Page 54, FPP15

Please amend the first paragraph to read "Any change of use proposals in this area should seek to retain a high proportion of retail activity."

Page 68, FPP21

Correction: "The provision of beach huts will be limited to those which currently exist. Any increased provision will be directed towards other parts of the sea front (namely Felixstowe Ferry Golf Club to Cobbolds Point Preferred Policy FPP19) as appropriate."

Page 74, FPP24

The policy should open with the following opening sentence:

"The need to strengthen Felixstowe as a seaside destination is recognised."

The next sentence should read: "Holiday accommodation will be encouraged and supported"

Page 82, FP27

This should be titled FPP27 rather than FP27.

C - 6775 - 3060 - Preferred Policy FPP21: Spa to Martello Park - None

6775 Comment

Tourism and Sea Front activities

Preferred Policy FPP21: Spa to Martello Park

Please revise the first line of text to read "Spa Gardens and Town Hall Gardens".

Appendix 7:Felixstowe, Trimley St. Mary & Trimley St. Martin Inset Map.
The Physical Limits boundary in regard to the seaward boundary should be drawn as in the 2001 Local Plan map - i.e disappear in to the sea rather than be drawn along the low water mark.

The dotted blue line denoting Proposed Tourism Areas is misleading and these areas should be marked out to define the landward extent and total area covered by those corresponding policies. Landguard peninsula should also be encapsulated whereas the line appears to end at Landguard point. As above, the lines between the areas should simply stop at the sea. The extensions of those lines into the sea can be wrongly interpreted as representing a policy as applying to an element of the sea.

The port area should be included within the Physical Limits boundary as is the case in the 2001 Local Plan map. The Physical Limits boundary in the Manor End area should include the caravan parks and Custom House, terminating at the boundary of Landguard Common.

The colouring of some of the designations on the main map are confusingly similar, notably those for the Proposed District Centre, the District Centre boundary and the revised Physical Limits boundary. Also, the use of very heavy lines at the scale of the main map is unhelpful.

Notwithstanding these observations, thank you for the opportunity to have been consulted. The Town Council looks forward to receiving information on the further development of the Area Action Plan.

Summary:

Page 68, FPP21

Correction: "The provision of beach huts will be limited to those which currently exist. Any increased provision will be directed towards other parts of the sea front (namely Felixstowe Ferry Golf Club to Cobbolds Point Preferred Policy FPP19) as appropriate."

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

AAP Preferred Options Consultation Response.pdf

S - 7151 - 744 - Preferred Policy FPP21: Spa to Martello Park - None

7151 Support

Tourism and Sea Front activities

Preferred Policy FPP21: Spa to Martello Park

Respondent: Historic England (Sir/ Madam) [744] Agent: N/A

Full Text: Re: Preferred Options Public Consultation (19th October - 30th November 2015)

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In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of two Grade II Listed Buildings (the Hand in Hand public house and Nos 251 and 253 High Road). We highlighted that both these buildings are traditional vernacular structures that date back to the agrarian origins of the village, and their current proximity to open countryside contributes to their setting and significance. We therefore encouraged the Local Planning Authority to identify alternative sites if at all possible so that the setting of these two buildings might be protected. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. However, it is also acknowledged that the policy requires a village green to be included within the scheme. The village green is to front High Road in order to reduce the impact on the setting of the Hand in Hand public house and this is particularly welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP7: Land off Howlett Way, Trimley St Martin (451c and 451d)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of the two Grade II listed churches and the Grade II listed Old Rectory. Whilst it is acknowledged that the consideration of the setting of the rectory is included within the policy, and this is welcomed, we would advise that the setting of the churches is also included. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP8: Land off Thurmans Lane, Trimley St Mary (383f and 451f)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of Grade II Listed Building Mill Farmhouse. It is acknowledged that there is a requirement in the policy that the development will need to be sympathetic to the setting of the mill and this is welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

Town Centre

FFP14: Felixstowe Town Centre and FFP15: Retail Frontages

As outlined within our response to you dated 25th February 2015 it is considered these policies should cover

S - 7151 - 744 - Preferred Policy FPP21: Spa to Martello Park - None

7151 Support

Tourism and Sea Front activities

Preferred Policy FPP21: Spa to Martello Park

conservation and design issues. It is considered the policies should highlight the importance of retaining or restoring historic shopfront features both in terms of the positive contribution historic shopfronts make to the character of an area but also the economic benefit of providing traditional and bespoke shopping units to shopowners. A good example of how historic shopfronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a National success. The council have also seen a ripple effect of surrounding properties being restored. As well as including conservation and design issues within these policies the Council could consider additional advice within a Supplementary Planning Guide on Historic Shopfronts, especially given the importance and contribution the Historic shopping areas within the settlements of Suffolk make to the wider area.

District Centres

FPP17: District Centres

As above it is considered that this policy should cover conservation and design issues. It should highlight the contribution the Historic Environment makes to the economic success of district centres and seek to protect and enhance both the setting of historic assets and assets themselves.

Tourism and Sea Front Activities

We welcome the inclusion of a section which covers tourism and seafront activities. It is considered that point 6.03 on page 61 could also acknowledge and highlight the wider and more general positive contribution to Felixstowe that heritage tourism brings.

FFP18: Felixstowe Ferry and Golf Course, FFP19: Felixstowe Ferry Golf Club to Cobbolds Point, FPP20: Cobbolds Point to Spa, FPP21: Spa to Martello Park and FFP22 Martello Park to Landguard We welcome and support the acknowledgement and required protection of the historic qualities of these sections of the coast.

FPP23: Car Parking

We welcome the 'high quality of design' requirement relating to replacement car parking at point 6.36 on page 72. It is considered that this requirement should be included within the policy itself to give it more weight in decision making.

The Environment

We welcome the inclusion of a section on the Historic Environment which sits separately from landscape and ecological elements. We also welcome the section on Locally Listed Buildings and Features. It is considered the Historic Environment section should also highlight Felixstowe's archaeology.

It is acknowledged that no individual policies on the Historic Environment are proposed for the Area Action Plan itself, relying instead on saved policies within the Core Strategy and the National Planning Policy Framework. The Core Strategy does not have a specific historic environment policy, with certain aspects covered in other policies such as SP15 (Landscape and Townscape) and DM21 (Design Aesthetics) and policies for specific settlements. It is considered that there is a lack of a clear strategy relating to the Historic Environment, relating to local issues, at present, and we would encourage greater clarity. This should set out the Council's approach to the management of designated and non-designated heritage assets (including archaeology) and how issues such as heritage at risk will be tackled. It is considered that a Historic Environment Policy could be locally specific to cover the Felixstowe Peninsula Area Action Plan.

In addition to the above it is acknowledged that the issue of Felixstowe South Conservation Area At Risk is not being covered by the Plan. We therefore reiterate our previous comments as follows, it would be advantageous if the Area Action Plan identified specific policies to help remove it from the register. These might include utilising the conservation area appraisal to identify locally important buildings that contribute positively to the conservation area, and introduction Article 4 directives to protect such buildings. There may also be sites which are considered negative contributors to the character and appearance of the conservation area and the preparation of development briefs for such sites might help bring forward positive redevelopment. The conservation area survey identified the loss of architectural detail as a significant problem, and consideration might therefore be given to applying to the Heritage Lottery Fund for a Townscape Heritage programme for the area, or a smaller partnership scheme with Historic England to reinstate lost architectural details on key buildings. We would therefore still recommend the inclusion of a policy which tackles the issues at Felixstowe South Conservation Area.

FPP26: Areas to be Protected from Development

In our response to you dated 25th February 2015 we expressed concerns regard the inclusion of all the sites in Trimley St Martin which would in effect surround a number of Listed Buildings including Grade II listed churches, the Grade II listed Old Rectory and Grade II Listed Building Mill Farmhouse. We recommended the inclusion of an area to be protected from development which would protect the remaining green wedge and as a result protect the setting of a number of Listed Buildings. It is acknowledged that the green wedge within Trimley St Martin is proposed to be included within the Areas to be Protected from Development and this is particularly welcomed and supported.

FPP27: Historic Park and Garden

We welcome the inclusion and the content of this policy.

S - 7151 - 744 - Preferred Policy FPP21: Spa to Martello Park - None

7151 Support

Tourism and Sea Front activities

Preferred Policy FPP21: Spa to Martello Park

Other Issues

Coastal Change Management and Areas of Flooding

We welcome the inclusion of this section. It is considered this section should also contain a paragraph on issues and opportunities of climate change and flooding relating to the Historic Environment. Further guidance on flooding issues can be found here- http://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/.

For information and for further policy consultation please note our new consultation email address for the East of

England, eastplanningpolicy@HistoricEngland.org.uk.

Summary: We welcome and support the acknowledgement and required protection of the historic qualities of these sections of the

coast.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

S - 7303 - 3843 - Preferred Policy FPP21: Spa to Martello Park - None

7303 Support

Tourism and Sea Front activities

Preferred Policy FPP21: Spa to Martello Park

Respondent: Felixstowe Chamber of Trade and Commerce

(Rachel Cronin) [3843]

Agent: N/A

Full Text:

RESPONSE OF FELIXSTOWE CHAMBER OF TRADE AND COMMERCE TO THE FELIXSTOWE PENINSULAR

AREA ACTION PLAN

FPP4

Felixstowe Chamber of Trade and Commerce supports development of new business units. Business units should consider light industrial and units for start-up businesses offering flexible terms.

The Chamber would also support modem eco design to suit the local environment.

FPP10

Felixstowe Chamber agrees with the policy to promote and safeguard land for employment, whether it relates to Port activities or otherwise. The development of Uniserve may increase the variety of employment opportunities not Port related.

FPP11 & 12

The Chamber supports the use of these area for start-up premises.

FPP14

The Chamber would wish the focus to extend to professional services on the ground floor as well as retail. It is as important for members of the public to access financial and legal services at ground level, particularly for those with disabilities. Many residents will expect such services to be located in the town centre for ease of access.

The Chamber supports the extension of the shared space and the improved connection between the town centre and the tourist centre. Retail in Felixstowe should be seen and promoted as part of the tourist offer.

FPP15

Again, the Chamber would seek an amendment to include reference to professional services being incorporated on the ground floor.

FPP21

The Chamber of Commerce supports the use of properties on the Sea Road to be resort related. The Chamber is concerned that residential and resort uses may conflict, in particular for car parking provision.

The Chamber of Commerce also supports any proposals which provide a link between the sea front and town centre.

FPP23

The Chamber supports the careful development of visitor car parking. Car parking should provide a clear town map with estimated distances on foot to tourist locations. The Chamber would support a one-day roaming ticket allowing visitors to park in any car park on the peninsular to encourage visitors to stay for the day and to explore the range of attractions.

Summary:

The Chamber of Commerce supports the use of properties on the Sea Road to be resort related. The Chamber is concerned that residential and resort uses may conflict, in particular for car parking provision.

The Chamber of Commerce also supports any proposals which provide a link between the sea front and town centre.

Change to Plan N/A

 Appear at exam?
 Legal?
 Sound?
 Duty to Cooperate?
 Soundness Tests

 Not Specified
 Not Specified
 Not Specified
 Not Specified
 N/A

C - 6813 - 2839 - 6.28 - None

6813 Comment

Tourism and Sea Front activities

6.28

Respondent: RSPB (Jacqui Miller) [2839] Agent: N/A

Full Text: Re: Site Allocations and Area Specific Policies - Preferred Options Consultation

Thank you for consulting the RSPB regarding the Preferred Options Consultation. Please find our comments below.

Site Allocations and Area Specific Policies DPD - Preferred Options Consultation Document

Introduction

Paras. 106-107 and Policy SSP1 refer to the planning application at Adastral Park. It should be noted that at this stage, there cannot be confidence that the application and its associated green space provision will be realised, as the application is as yet undetermined. Therefore this project should not be relied upon to provide mitigation for recreational pressure on European sites through the provision of green space for the district as a whole.

SSP3 Land to the rear of Rose Hill, Saxmundham Road, Aldeburgh (SHLAA ref 608)

We have previously raised concerns (in our response of 26th February 2015 to the Issues and Options consultation) about this site regarding its proximity to the Alde-Ore Estuary SPA and Ramsar site, however, this was on the basis of 69-108 houses. A reduction to ten houses plus a care home may reduce concerns, but this restriction should be clearly worded (as an upper limit) into the resulting policy (SSP3). At present it is not clear whether the requirement is for less than ten units (as in the excerpt from the Sustainability Appraisal) or 'around ten' as in para. 2.23. As noted in the Habitats Regulations Assessment (HRA), the status and use of the access route to the estuary should be clarified, and the provision of alternative open space considered. It should be noted that, if an application is brought forward for this site, HRA at the project level will be required, and proposals for mitigation should be included in plans for any development.

We support the rejection of alternative option site 982. We note that Appendix 3 indicates that this site was rejected due to potential effects on the Alde-Ore Estuary SPA (in line with our comments). This should be recognised here.

SSP10 Land west of Garden Square Rendlesham

We support the requirement to provide open space for daily dog walking as an alternative to the more sensitive Tunstall and Rendlesham Forests (part of the Sandlings SPA).

SSP22 Bentwaters Park, Rendlesham

We note that the policy refers to the sensitivities of this site within the AONB. This policy should also recognise that Bentwaters Parks adjoins the Sandlings SPA and is in close proximity to the Alde-Ore Estuary SPA, SAC and Ramsar site. It will be necessary to consider potential effects on these designated wildlife sites when making decisions as to future activities on this site.

Section 5 - Tourism

References to Natura 2000 sites in para. 5.02 should include the Sandlings, as well as the estuaries.

Policy SSP30 proposes a restriction on public car parking within 1km of the Deben Estuary as mitigation against increases in recreational pressure resulting from the in-combination effects of housing proposals in the area. Whilst we support some restrictions on new parking provision, we suggest this should focus on provision relating to activities likely to cause most disturbance and/or locations that are most sensitive to disturbance. Seasonal restrictions could also be considered, based on the presence of sensitive species. We are also concerned that purely restricting access does not encourage responsible behaviour and enjoyment of and respect for the natural environment. We therefore recommend that consideration is given to a range of mitigation measures which could be funded through a formalised developer contributions scheme. The Council should consider those measures proposed in the Deben Estuary Plan, with examples including:

□ seasonally adapted routes including diversions if necessary
□ screening of routes
provision of information to visitors - signage, interpretation, community events to educate people about the
importance of the area and responsible visiting
□ gates preventing dogs running ahead
□ bunds and hides etc to screen birds from visitors in sensitive areas
□ managing visitor numbers during busy periods through charging and parking restrictions
□ quidance for dog walkers and river users (e.g. through codes of conduct)
□ a wardening scheme
an ongoing visitor management plan - including provision for monitoring of impacts and review of mitigation

As noted in para. 5.05 of the Site Allocations and Area Specific Policies DPD, this approach should be complemented with provision of areas of attractive alternative green space, including areas suitable for dog walking, within individual

C - 6813 - 2839 - 6.28 - None

6813 Comment

Tourism and Sea Front activities

6.28

development sites.

SSP31 Snape Maltings

While para. 5.06 refers to the conservation importance of the area within which Snape Maltings is set, the policy itself does not. We recommend that the sentence requiring that all proposals should seek to protect and enhance the special character and interest of the heritage assets should be amended to include the natural environment as well.

Section 6 Recreation and Green Infrastructure

We are pleased that the Haven Gateway Green Infrastructure Strategy (HAGGIS) has recently been updated, however, this update does not appear to be available for review. In our previous comments of 26th February 2015 on the Issues and Options consultation, we recommended that the 2011 Green Infrastructure Strategy for the Suffolk Coastal district is also updated. We commented that:

"At present the district Green Infrastructure Strategy appears focused on recreational provision. Whilst important, we consider that there is also an opportunity to expand the Strategy to include biodiversity targets. This should aim to create networks of sites of biodiversity value that 'fill the gaps' between existing green space features and sites of importance for biodiversity. Joined up networks are more functional and allow species to move between sites, helping them to adapt to the likely effects of climate change. We recommend that the currently available maps of priority habitat types are supplemented by map(s) showing designated sites (including international sites, SSSIs and County Wildlife Sites). These maps of current biodiversity resource can then be used to identify those areas which could be targeted for restoration, buffering or linkage through habitat creation or restoration."

RSPB response to Suffolk Coastal District Council Site Allocations and Area Specific Policies Issues and Options Consultation, 26th February 2015

These comments are still relevant. We also recommend that the outputs from the HAGGIS update and an update to the Suffolk Coastal Green Infrastructure Strategy should be consolidated into an SPD setting out a district-wide strategy, alongside standards for green infrastructure provision within developments. The production of an SPD would clarify and formalise requirements and ensure that there is one easily accessible set of targets and standards for the district.

Section 7 - Environment

Para. 7.03 discusses potential mitigation required as a result of increased recreational pressure. It should be clarified that this mitigation is with regard to impacts on designated European conservation sites (SPAs, SACs and Ramsar sites).

New site 3007 Saxmundham sub area (Land to south east of Blythburgh Road)

We agree with the rejection of this site due to the acknowledged potential for impact on the Minsmere-Walberswick SPA, SAC and SSSI.

New site 3024 Saxmundham sub area (Land off Aldringham Road)

We agree with the rejection of this site due to the acknowledged potential impact on the Sandlings SPA and SSSI.

Habitats Regulations Assessment for Site Allocations and Area Specific Policies DPD

Para 2.3.2 states that the assessment of the Suffolk Coastal Core Strategy found no adverse effect on the integrity of any European site. This should be clarified to state that this is dependent on the provision of mitigation to address recreational pressure as a result of housing numbers. Without such mitigation, adverse effects on integrity would result.

Para. 3.3.3 refers to a Green Infrastructure Plan under consideration by Suffolk Coastal District and Ipswich Borough. As stated in our comments above, we consider that this work should be formalised within an SPD.

Para. 3.3.3 also refers to a country park proposed as part of the Adastral Park development. As stated above, there cannot be confidence that the application and its associated green space provision will be realised, as the application is as yet undetermined.

We agree with the assessment in para. 3.4.2 that policies SSP3 Land to the rear of Rose Hill, Saxmundham Road, Aldeburgh and SSP31 Snape Maltings could have a Likely Significant Effect on European sites.

We support the conclusion in para. 3.4.15 that a visitor disturbance study is required for the Alde-Ore Estuary in order to understand possible impacts from Policy SSP31 Snape Maltings. As noted in para. 3.5.1, both the policies resulting in Likely Significant Effect relate to the Alde-Ore Estuary, hence a disturbance study could also aid assessment of SSP3 Land to rear of Rose Hill, Saxmundham Road, Aldeburgh and any future developments close to the estuary.

Para. 3.4.16 refers to the proposed restriction in new car parking around the Deben Estuary and opportunities to apply this policy to other European Sites. We recommend the approach suggested above (see comments on Section 5 -

C - 6813 - 2839 - 6.28 - None

6813 Comment

Tourism and Sea Front activities

6.28

Tourism) for the Deben Estuary, and that consideration should be given to a similar scheme for other European sites (potentially including the Alde-Ore Estuary, dependant on the results of the proposed disturbance study).

We support the statement in para. 3.6.3 that the proposed development of Adastral Park will require its own project level HRA

The discussion of SSP38 Coastal Change Management Area in Appendix 2 Screening of Individual Policies notes that the policy should emphasis that 'large lengths of the coast are European sites or related to European sites, and that Habitats Regulations Assessment is likely to apply to developments affecting these lengths of coast.' We support this recommendation

Felixstowe Peninsula Area Action Plan Preferred Options Document

Para. 2.01 refers to some of the environmental designations which illustrate the importance of the Felixstowe area. Reference to the SPA, which is an international designation, would enhance this.

There appears to be some inconsistency between the AAP and Policy SSP30 Visitor Management - Deben Estuary. Paras. 6.10 and 6.11 discuss access and parking - these should be checked for consistency with the policy. Policy FPP18 Felixstowe Ferry and Golf Course also appears inconsistent with SSP30 in that it seeks to increase parking provision. Note that we have suggested amendments to Policy SSP30 (see our comments on the Site Allocations and Area Specific Policies DPD under Section 5 - Tourism).

Para. 6.10 refers to recreational pressure on the Deben Estuary SPA. It should also be noted that The Knolls (just outside the SPA) are important for breeding little terns, and are also vulnerable to recreational pressure.

Paras. 6.28 - 6.33 could make reference to the breeding birds of the Landguard Common SSSI, particularly ground nesters, as these species are particularly sensitive to recreational disturbance.

Paras. 7.05 - 7.07 discuss the update to the HAGGIS study. Please refer to our comments on the Site Allocations and Area Specific Policies DPD under Section 6 - Recreation and Green Infrastructure above.

Policy FPP25 Access to the Countryside refers to the provision of green infrastructure. We recommend that proposals for green infrastructure which maximise biodiversity benefits should also be encouraged.

We support the rejection of New Site 3028 Land at Manor Terrace as this site is very close to the Landguard Common SSSI and its sensitive plants and breeding birds.

Habitats Regulations Assessment for Felixstowe Peninsula Area Action Plan

We support the recommendation in para. 3.4.3 that Policy FPP10 Port of Felixstowe is expanded to include reference to the potential need for HRA should developments be proposed within or to expand the Port.

We trust that these comments are helpful. If you have any queries about the comments above, please do not hesitate to contact me.

Summary:

Paras. 6.28 - 6.33 could make reference to the breeding birds of the Landguard Common SSSI, particularly ground nesters, as these species are particularly sensitive to recreational disturbance.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

RSPB response to preferred options consultation 231115.pdf

C - 7071 - 2744 - Preferred Policy FPP22: Martello Park to Landquard - None

7071 Comment

Tourism and Sea Front activities

Preferred Policy FPP22: Martello Park to Landguard

Respondent: Mr & Mrs Trevor & Gillian Mason [2744] Agent: N/A

Full Text: The below comments are forwarded in response to the consultation which ends on Monday 30th November 2015.

Housing

3.05 - "Within the Felixstowe Peninsula a figure of 50 units has been added to the requirement for Felixstowe Walton and the Trimlevs"

How is this figure calculated? The overall figure for Felixstowe has risen from 1,400 (inc the surrounding villages) in 2008 to 1,810 (exc the surrounding villages) in 2015. With this figure moving upwards all the time, the AAP will be meaningless by 2027. What plans are there to review it at regular intervals?

With regard to infrastructure provisions, there is currently a waiting list of 700 people at Crescent Dental Practice. The Grove Medical Centre (the largest in the town) is short of three doctors, and has to rely on retired GPs to try and fill the gaps. Their recent advertisement for salaried doctors achieved no applicants.

How are all these new residents going to be accommodated? Hoping for the best is not good enough.

Land North of Conway Close - SHLAA Ref. 502e

The Assessment is misleading and inaccurate in that it would provide access to two primary schools - if they still have capacity once the 200 homes have been built on the other side of Ferry Road. Those houses are intended to have their full quota of affordable houses in order to attract young families. For "Helps reduce the effects of traffic on the environment" read "access will be via a narrow country road which cannot cope with the current level of traffic". The main access to and from the Academy will be via a designated Quiet Lane, otherwise a two mile journey along Walton High Street will be necessary.

The site is referred to as "a central location" which is incorrect. It is 1.5 miles from the town centre, 4 miles by road from the Port complex, making a car essential. Its only large shopping outlet (20 minutes walk) is a convenience store whose prices accommodate small shopping needs only.

The site will suffer the same drainage problems as its neighbour, with developers to date being unable or unwilling to install a new system due to cost.

Preferred Policy FPP5:

150 dwellings is a minimum and based on medium density. No developer would be able to make a profit on providing 150 homes in keeping with existing (predominantly bungalows), let alone provide public open space and play facilities.

Directly opposite this site OPP was given last year for up to 200 homes, which represents high density. No stipulation was made that the new homes had to be in keeping with existing residences and no maximum height was given. No play space or open space is being provided (on the basis that the Council has refused to pay for its upkeep) and it is obvious that the same will apply to the 502e site.

District Centres

FPP17:

Expansion of District Centres - the DC identified at High Road East is entirely surrounded by houses. Apart from expanding across the road to Brackenbury Sports Centre, it does not seem possible to expand the retail element in this area.

In general terms, how is it possible to expand District Centres without affecting the town centre?

Some clarification on this point is necessary in order to convince the public.

Leisure

It can be anticipated that the 1,800 new residents will want something to do in their leisure time, but no specific activities are mentioned in the AAP. An opportunity has been lost with the designation of the old Yacht Pond site as a car park when it is not being used for mobile events - can this decision be reviewed in, say, two years time when useage for events is known? It would make a great site for a skate park and keep the youngsters off the road and the prom - particularly now the latter is being used by cyclists.

FPP22:

C - 7071 - 2744 - Preferred Policy FPP22: Martello Park to Landquard - None

7071 Comment

Tourism and Sea Front activities

Preferred Policy FPP22: Martello Park to Landguard

"Uses which enhance the unique landscape of Landguard" What are these? No examples are given. Does it take account of the current plans for the redevelopment of the Port and movement of the Viewing Point Café nearer to the museum? Car parking is essential to enjoy this area but should not be provided to the detriment of the natural enjoyment of this unique area.

Could some effort be made to ensure that bins are provided for detritus left by fishermen? Landguard beach is vulnerable to old bait and fish heads barely concealed in newspaper and buried in the shingle. This should not be allowed as it represents a serious hazard for others trying to enjoy the area. This will be particularly important if enhancement of the area is planned.

Summary:

"Uses which enhance the unique landscape of Landguard" What are these? No examples are given. Does it take account of the current plans for the redevelopment of the Port and movement of the Viewing Point Café nearer to the museum? Car parking is essential to enjoy this area but should not be provided to the detriment of the natural enjoyment of this unique area.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot Specified

S - 7152 - 744 - Preferred Policy FPP22: Martello Park to Landquard - None

7152 Support

Tourism and Sea Front activities

Preferred Policy FPP22: Martello Park to Landguard

Respondent: Historic England (Sir/ Madam) [744] Agent: N/A

Full Text: Re: Preferred Options Public Consultation (19th October - 30th November 2015)

Felixstowe Peninsula Area Action Plan

Thank you for your letter dated 15th October 2015 regarding the above consultation. We have had the opportunity to assess the letter and consultation documents and can offer the following. Please note we have provided comments on the Site Allocations and Area Specific Policies within a separate letter to you dated the same. This follows a previous consultation and our comments dated 25th February 2015.

In terms of our general comments:

Recent Guidance from Historic England

We have recently published guidance on the Historic Environment and Site Allocations. Where we have not made comment below some additional guidance on ensuring a positive strategy for the historic environment is secured within the Felixstowe Area Action Plan can be seen by following this link- http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/.

In terms of our site specific comments:

Housing Sites

FPP4: Land north of Walton High Street, Felixstowe (451g)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the possible impact on the setting of two Listed Buildings, Grade II* Listed Walton Hall and Grade II Listed 362 High Street. We highlighted that the principal elevation of Walton Hall faces north and overlooks site 451g. It was considered that development here would urbanise the setting of this important, highly designated heritage asset, resulting in harm to its significance. It was expressed that harm would also be caused to the Grade II lodge and we strongly advised that an alternative site was found for development, though it was thought that there may be scope for some limited development at the eastern end of this site. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. The policy does however highlight that the development will need to be sympathetic to the Listed Buildings found at Walton Hall and 362 High Street. Whilst this would go some way to allay our concerns we still recommend that whilst it is considered the site can take a level of development there would be a detrimental harm to the setting of the Listed Buildings if the whole site is developed. If the site is to remain in the plan we would advise that the western end of the site is left relatively undeveloped to help protect the setting and it is considered that this side of the site might lend itself to fulfil the Public Open Space requirement.

FFP5: Land north of Conway Close, Felixstowe (502e)

We welcome the acknowledgment of the Listed Buildings and the requirement that development will need to be sympathetic to the Listed Buildings within the policy. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FFP6: Land opposite Hand in Hand Public House, Trimley St Martin (451b)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of two Grade II Listed Buildings (the Hand in Hand public house and Nos 251 and 253 High Road). We highlighted that both these buildings are traditional vernacular structures that date back to the agrarian origins of the village, and their current proximity to open countryside contributes to their setting and significance. We therefore encouraged the Local Planning Authority to identify alternative sites if at all possible so that the setting of these two buildings might be protected. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. However, it is also acknowledged that the policy requires a village green to be included within the scheme. The village green is to front High Road in order to reduce the impact on the setting of the Hand in Hand public house and this is particularly welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP7: Land off Howlett Way, Trimley St Martin (451c and 451d)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of the two Grade II listed churches and the Grade II listed Old Rectory. Whilst it is acknowledged that the consideration of the setting of the rectory is included within the policy, and this is welcomed, we would advise that the setting of the churches is also included. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP8: Land off Thurmans Lane, Trimley St Mary (383f and 451f)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of Grade II Listed Building Mill Farmhouse. It is acknowledged that there is a requirement in the policy that the development will need to be sympathetic to the setting of the mill and this is welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

Town Centre

FFP14: Felixstowe Town Centre and FFP15: Retail Frontages

As outlined within our response to you dated 25th February 2015 it is considered these policies should cover

S - 7152 - 744 - Preferred Policy FPP22: Martello Park to Landquard - None

7152 Support

Tourism and Sea Front activities

Preferred Policy FPP22: Martello Park to Landguard

conservation and design issues. It is considered the policies should highlight the importance of retaining or restoring historic shopfront features both in terms of the positive contribution historic shopfronts make to the character of an area but also the economic benefit of providing traditional and bespoke shopping units to shopowners. A good example of how historic shopfronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a National success. The council have also seen a ripple effect of surrounding properties being restored. As well as including conservation and design issues within these policies the Council could consider additional advice within a Supplementary Planning Guide on Historic Shopfronts, especially given the importance and contribution the Historic shopping areas within the settlements of Suffolk make to the wider area.

District Centres

FPP17: District Centres

As above it is considered that this policy should cover conservation and design issues. It should highlight the contribution the Historic Environment makes to the economic success of district centres and seek to protect and enhance both the setting of historic assets and assets themselves.

Tourism and Sea Front Activities

We welcome the inclusion of a section which covers tourism and seafront activities. It is considered that point 6.03 on page 61 could also acknowledge and highlight the wider and more general positive contribution to Felixstowe that heritage tourism brings.

FFP18: Felixstowe Ferry and Golf Course, FFP19: Felixstowe Ferry Golf Club to Cobbolds Point, FPP20: Cobbolds Point to Spa, FPP21: Spa to Martello Park and FFP22 Martello Park to Landguard We welcome and support the acknowledgement and required protection of the historic qualities of these sections of the coast.

FPP23: Car Parking

We welcome the 'high quality of design' requirement relating to replacement car parking at point 6.36 on page 72. It is considered that this requirement should be included within the policy itself to give it more weight in decision making.

The Environment

We welcome the inclusion of a section on the Historic Environment which sits separately from landscape and ecological elements. We also welcome the section on Locally Listed Buildings and Features. It is considered the Historic Environment section should also highlight Felixstowe's archaeology.

It is acknowledged that no individual policies on the Historic Environment are proposed for the Area Action Plan itself, relying instead on saved policies within the Core Strategy and the National Planning Policy Framework. The Core Strategy does not have a specific historic environment policy, with certain aspects covered in other policies such as SP15 (Landscape and Townscape) and DM21 (Design Aesthetics) and policies for specific settlements. It is considered that there is a lack of a clear strategy relating to the Historic Environment, relating to local issues, at present, and we would encourage greater clarity. This should set out the Council's approach to the management of designated and non-designated heritage assets (including archaeology) and how issues such as heritage at risk will be tackled. It is considered that a Historic Environment Policy could be locally specific to cover the Felixstowe Peninsula Area Action Plan.

In addition to the above it is acknowledged that the issue of Felixstowe South Conservation Area At Risk is not being covered by the Plan. We therefore reiterate our previous comments as follows, it would be advantageous if the Area Action Plan identified specific policies to help remove it from the register. These might include utilising the conservation area appraisal to identify locally important buildings that contribute positively to the conservation area, and introduction Article 4 directives to protect such buildings. There may also be sites which are considered negative contributors to the character and appearance of the conservation area and the preparation of development briefs for such sites might help bring forward positive redevelopment. The conservation area survey identified the loss of architectural detail as a significant problem, and consideration might therefore be given to applying to the Heritage Lottery Fund for a Townscape Heritage programme for the area, or a smaller partnership scheme with Historic England to reinstate lost architectural details on key buildings. We would therefore still recommend the inclusion of a policy which tackles the issues at Felixstowe South Conservation Area.

FPP26: Areas to be Protected from Development

In our response to you dated 25th February 2015 we expressed concerns regard the inclusion of all the sites in Trimley St Martin which would in effect surround a number of Listed Buildings including Grade II listed churches, the Grade II listed Old Rectory and Grade II Listed Building Mill Farmhouse. We recommended the inclusion of an area to be protected from development which would protect the remaining green wedge and as a result protect the setting of a number of Listed Buildings. It is acknowledged that the green wedge within Trimley St Martin is proposed to be included within the Areas to be Protected from Development and this is particularly welcomed and supported.

FPP27: Historic Park and Garden

We welcome the inclusion and the content of this policy.

S - 7152 - 744 - Preferred Policy FPP22: Martello Park to Landguard - None

7152 Support

Tourism and Sea Front activities

Preferred Policy FPP22: Martello Park to Landguard

Other Issues

Coastal Change Management and Areas of Flooding

We welcome the inclusion of this section. It is considered this section should also contain a paragraph on issues and opportunities of climate change and flooding relating to the Historic Environment. Further guidance on flooding issues can be found here- http://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/.

For information and for further policy consultation please note our new consultation email address for the East of

England, eastplanningpolicy@HistoricEngland.org.uk.

Summary: We welcome and support the acknowledgement and required protection of the historic qualities of these sections of the

coast.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

S - 7349 - 2516 - Preferred Policy FPP22: Martello Park to Landguard - None

7349 Support

Tourism and Sea Front activities

Preferred Policy FPP22: Martello Park to Landguard

Respondent: Natural England (Sir/ Madam) [2516] Agent: N/A

Full Text: Planning consultation: Preferred Options Public Consultation

Site Allocations and Area Specific Policies; Felixstowe Peninsula Area Action Plan

Thank you for your consultation on the above which was received by Natural England on 19 October 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.

WILDLIFE AND COUNTRYSIDE ACT 1981 (AS AMENDED)
CONSERVATION OF HABITATS & SPECIES REGULATIONS 2010 (AS AMENDED)

Site Allocations and Area Specific Policies Development Plan Document

Preferred Options Consultation Document (October 2015)

Preferred Option Policy SSP1: New Housing Delivery 2015 - 2027

We note the requirement for new housing delivery to meet, as a minimum, the Core Strategy requirement for 7,900 homes over the period 2010 - 2027.

Preferred Option SSP3 - Land rear of Rose Hill, Saxmundham Road Aldeburgh

The policy allocates 3ha of land at this location for the provision of a care home plus ten residential units. The site is about 300m from Alde-Ore Estuary Special Protection Area (SPA)/Ramsar site and Alde-Ore and Butley Estuaries Special Area of Conservation (SAC). The avoidance of strategic housing proposals at Martlesham and at Felixstowe Peninsula within 1km of the Deben Estuary and

Orwell Estuary respectively has been proposed as mitigation in part for adverse effects arising from increased recreational disturbance. Preferred Option SSP3 is within 1km of the Alde-Ore Estuary and therefore we advise that it would be required to have a Habitats Regulations Assessment at the application stage.

The Preferred Option is within Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). We note the requirements for design to take account of the sensitive landscape context of the development and advise that a Landscape and Visual Assessment (LVIA) would be required at the application stage. In summary, further detailed information will be required to assess the environmental impact of the proposed policy at this location.

Preferred Option SSP18 Ransomes, Nacton Heath (around 30 hectares)

The potential development within the AONB has significant landscape and visual impacts. We note that potential mitigation is stated to include de-designation of AONB land, rationalising existing AONB boundary and/or high quality design of buildings, structures and setting to reduce landscape impacts and impacts on potential historic interests. We advise that the policy should not rely on the

boundary of the AONB being amended. For clarity, it is Natural England's statutory responsibility to determine the designation of AONBs or to review existing AONB boundaries. For further information, please see following a link to our Designations Strategy:

http://publications.naturalengland.org.uk/publication/2647412.

However, we support the proposal for a development brief to be prepared by the District Council toprovide detailed planning guidance for the whole area, covering both the former employment allocation and the AONB element to allow for a more flexible approach to be progressed.

Preferred Option SSP30 Visitor Management - Deben Estuary

We agree with the policy to prevent increased recreational disturbance of Deben Estuary by preventing any additional car parking provision within a 1km distance of the estuary and by requiring proposed improvements to existing access points which would result in an increased level of recreational activity on the estuary to demonstrate that they will not result in any "significant effect" either on their own or in combination with other uses.

Preferred Option SSP31 Snape Maltings (replaces policy AP166)

The policy promotes the use of Snape Maltings for arts, recreation, and tourism-related uses. Snape Maltings is within Suffolk Coast and Heaths AONB and is adjacent to Alde-Ore Estuary SPA/Ramsar site and Alde-Ore and Butley Estuaries SAC. Proposals at this location will be required to demonstrate that they will not have an adverse impact on the protected landscape and designated sites and may require a Habitats Regulations Assessment and/or LVIA at application stage.

Habitats Regulations Assessment

We agree with the screening exercise carried out by the HRA that Preferred Options SSP3 (Land rear of Rose Hill, Saxmundham Road Aldeburgh) and SSP31 (Snape Maltings) are likely to have a significant effect on internationally designated sites. We note that the HRA advises that a study of existing visitor disturbance to birds, looking at the amount and origin of visitor activity as well as the birds' response is required for the vicinity of Snape Maltings; we agree

S - 7349 - 2516 - Preferred Policy FPP22: Martello Park to Landguard - None

7349 Support

Tourism and Sea Front activities

Preferred Policy FPP22: Martello Park to Landguard

with the requirement for further evidence to inform a detailed assessment of this option.

We agree with the conclusion of the HRA (see section 5.1.1) which states that 'Site Allocation Document as a standalone document is likely to have a significant effect upon Alde-Ore Estuary European sites, with Preferred Policies SSP3 (land to the rear of Rose Hill, Saxmundham Road, Aldeburgh) and SSP31 (Snape Maltings) likely to have a significant effect by causing an increase in

disturbance to SPA-qualifying birds using the estuary'. However, we are unable to conclude no adverse effect on integrity of European sites from the subsequent statement that 'For both policies, further information and / or study might be able to inform a subsequent conclusion of no adverse effect upon the integrity of the European site' as this is not definite. We advise that either a rewording of the policies and/or further detailed assessment, including potential mitigation

measures, is required to enable us to have confidence in a conclusion of no adverse effect on integrity of European sites from these Preferred Options. We would be happy to give you further advice in this respect.

We support Preferred Option SSP30 (Visitor Management - Deben Estuary) regarding proposed improvements to access points such as slipways or jetties which may result in an increased level of recreational activity on the estuary needing to demonstrate that the proposal would not result in a likely significant effect on the notified features of the international site.

We note that the HRA states that mitigation for 'in combination' effects of new housing proposed in the Suffolk Coastal Core Strategy is being taken forward (section 3.3.3). In particular, we note that a Green Infrastructure plan is being considered by Suffolk Coastal District and Ipswich Borough to address the visitor management measures. In line with our current advice, we advise that this is not

sufficient to give confidence that the required mitigation measures will be delivered. There needs to be a commitment to having a mitigation strategy in place, informed by the green infrastructure plan, ideally by the time the plan is adopted or by a specified timescale shortly after the plan is adopted.

We advise this is necessary to give certainty that the mitigation measures will be delivered to ensure the plan is compliant with the Habitats Regulations and with paragraphs 113 and 118 of the NPPF.

We therefore suggest the following rewording:

'The Council will produce a mitigation strategy by {INSERT DATE} which will specify the measures required and how these will be delivered and funded'

Felixstowe Peninsula Area Action Plan

Preferred Options Consultation Document (October 2015)

Preferred Policy FPP1: Housing

We note that the Felixstowe Peninsula AAP identifies the requirement for 1,100 new dwellings on the preferred sites outlined in the document.

Preferred Policy FPP10: Port of Felixstowe

The policy promotes and safeguards land for employment, activities and operations which support the retention, expansion and consolidation of the Port of Felixstowe and the jobs associated with the Port. The expansion of the Port may have an impact on internationally designated sites. Please see our comments in Habitats Regulations Assessment below.

Preferred Policy FPP18: Felixstowe Ferry and Golf Course

We note that public access along the sea wall is to be retained within this area to ensure that sustainable links and connections are provided to maintain the unique character of the community and reduce the dominance of the motor car in this area. Please see our comments on England Coast Path below.

Preferred Policy FPP22: Martello Park to Landguard

We support the requirement for any future redevelopment of the port in this area to be carefully considered with the Landguard Partnership to ensure that the favourable condition of Landguard Common Site of Special Scientific Interest (SSSI) is maintained.

Preferred Policy FPP25: Access to the countryside

We support the policy which states that proposals which provide for the provision of green infrastructure in the Felixstowe Peninsula will be encouraged where these are well related to existing communities, offer good accessibility, connected to existing provision and provide alternative and accessible natural green space opportunities. We agree that proposals for new residential development in the Felixstowe Peninsula will be required to make provision of accessible natural green spaces as agreed by the District Council in conjunction with Natural England.

Habitats Regulations Assessment

We agree with the screening of the HRA which identified that Preferred Policy FPP10: (Port of Felixstowe) may have a likely significant effect on Stour and Orwell Estuaries SPA/Ramsar site as it stands. We agree with the conclusions of the HRA (see section 5.1.3) that the policy needs rewording to include a requirement for a Habitats Regulation Assessment to be provided in connection with proposals for expansion of Port of Felixstowe. We would be happy to give you

S - 7349 - 2516 - Preferred Policy FPP22: Martello Park to Landquard - None

7349 Support

Tourism and Sea Front activities

Preferred Policy FPP22: Martello Park to Landguard

further advice in this respect.

We note that the HRA states that mitigation for 'in combination' effects of new housing proposed in the Suffolk Coastal Core Strategy is being taken forward (section 3.3.3). Please see our comments for the Site Allocations and Area Specific Policies Development Plan Document HRA above.

England Coast Path

We would appreciate the opportunity to discuss the requirements of the England Coast Path (ECP) with you in order to ensure that the requirements of the Coast Path and any mitigation measures arising from it, are clearly distinguished from any mitigation that might be required from the Council's proposed allocations. For more information on ECP, please see our website as follows:

https://www.gov.uk/government/collections/england-coast-path-improving-public-access-to-thecoast.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

Summary:

We support the requirement for any future redevelopment of the port in this area to be carefully considered with the Landguard Partnership to ensure that the favourable condition of Landguard Common Site of Special Scientific Interest (SSSI) is maintained.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

Attachments:

 $168976_168977\ Preferred\ Options\ Consultation\ Felixstowe\ Peninsula\ AAP_Site\ Specific\ Allocations_Redacted.pdf$

C - 7087 - 3894 - 6.34 - None

7087 Comment

Tourism and Sea Front activities

6.34

Respondent: Mr Richard Burrow [3894] Agent: N/A

Full Text:

Having read the Felixstowe Peninsula Area Action Plan I am pleased with much of the content in that many of the environmental issues have been identified. However, I disagree with the assumption that the town's growth is inevitable at the expense of greenfield sites and extra burdens on the sewage and highways networks. There is mention of 'organic growth'; the plans go far beyond this. Here are my observations:

- 3.01 There is a reference to the need for 807 new homes for the peninsula. How has this demand been identified? Is there actually a growing population or is valuable farmland and countryside being sacrificed to artificially create a demand for new housing for the benefit of developers? With Felixstowe's specific demographic, there is a natural turnover of the different types of housing as residents move through the different phases of their lives e.g. downsizing through retirement or infirmity, meaning that properties are regularly becoming available (with the possible exception of affordable homes for purchase by first time buyers).
- 3.27 The area between the A14 Spur, Candlet Road and High Street, Walton is valuable and productive farmland and effectively constitutes a green belt in all but name between the Trimleys and Walton. The suggested development would change the rural nature of the approach to Felixstowe and further urbanise Candlet Road, particularly with the planned new road junction. I feel strongly that it should remain as farmland. The same argument applies to the other large greenfield sites identified, Poultry and Mill farms.
- 3.39 Development of this site to the north of Conway Close will contribute to the spread of the town into open countryside as well as causing ribbon development along Ferry Road. The fears that new housing in this area will impinge on Gulpher Lane in terms of traffic are very real; Colneis Road will definitely suffer increased vehicle use. This rural fringe of Old Felixstowe is picturesque and should be protected, in my opinion.
- 6.0 There is no mention in the document of the contribution of sea angling to the local economy, a strange omission for a town with a long tradition of fishing. I fish the local beaches twice a week on average and am impressed by how far visiting anglers travel to our shores. Perhaps there should be some appropriate signage identifying suitable fishing areas, launching sites, species with size limits etc. and the provision of vantage points for disabled anglers could be a possibility. Measures to promote such a healthy outdoor activity could be very beneficial to Felixstowe. Any putative redevelopment of the pier could have some planning requirements encouraging the attachment of a fishing jetty-Southwold Pier was built with this feature as part of the design.
- 6.34/ 6.35 Many vehicle enthusiasts see Felixstowe as destination of choice. The local plan could incorporate provision in the form of a designated sea front space (a car park on other days) that is bookable by, for example, classic car or motorcycle clubs, scooter enthusiasts etc. This would serve such organisations with the bonus of providing additional attractions for both visitors and residents in a regulated environment.

Summary:

Many vehicle enthusiasts see Felixstowe as destination of choice. The local plan could incorporate provision in the form of a designated sea front space (a car park on other days) that is bookable by, for example, classic car or motorcycle clubs, scooter enthusiasts etc. This would serve such organisations with the bonus of providing additional attractions for both visitors and residents in a regulated environment.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7098 - 3895 - 6.34 - None

7098 Comment

Tourism and Sea Front activities

6.34

Respondent: Ms C.H Haniford [3895] Agent: N/A

Full Text:

Comments on the Felixstowe Peninsula Area Action Plan

Para 3.0 Housing 3.28 & 3.29 Air Quality. How necessary would it be to have business units here? It's quite close to the proposed Strategic Employment area. There could be a risk of further pollution from some activities. Why not create a small shopping area?

SHLAA ref 451g

3.31 Is this to be high density housing?

3.32 Candlet Road is already unable to cope with traffic in the morning & evening rush hours - how would you improve this situation by the additional traffic from the proposed development? Would you introduce a cycle route to the Strategic Employment Area?

3.35 Access for walkers should continue across Candlet Road - perhaps a pedestrian bridge would ease safety concerns.

3.36 Anglia Water have commented here and elsewhere on the pressure on their network - what is to be done about this?

page 28 3.40, 3.41, 3.44 Density on this proposed site appears to be greater than on the adjoining site i.e. you propose 150 dwellings and the adjacent area of a similar size contains 32 dwellings. How necessary is it to create such a high density development in this area?

& page 29 3.45 The access to this site could be problematic as Gulpher Road is narrow and rural with several awkward bends, which is quite manageable when it's quiet, however a major (potential) increase could create unnecessary pollution and vehicular hazards.

SHLAA Ref 502e Overall Assessment The site can hardly be described as "central". Nor is it particularly close to "key services", unless you have transport, good mobility or no children.

4.0 Employment 4.04 Regarding rail services: there appears to be a conflict of interests between the needs of passengers and those of the port (and its less polluting mode of transportation of their containers) - what is to be done? Better and more reliable links for passengers would benefit tourism from further afield as well as better access for local people wishing to use the trains for long distance travel.

5.0 Retail FPP 14 p.52 Shared Space scheme - has there been any evidence gathered on how this is working out? Are there any proposals to limit access at Weekends?

6.0 Tourism & Sea Front p.71 Car Parking - on the day of 'Art on the Prom' there were half empty car parks and overflowing pavements in nearby streets, such as Princes Road and Queens Road. This often happens when there is a big event on the prom.

Summary:

Car Parking - on the day of 'Art on the Prom' there were half empty car parks and overflowing pavements in nearby streets, such as Princes Road and Queens Road. This often happens when there is a big event on the prom.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

S - 6931 - 3854 - 6.36 - None

6931 Support

Tourism and Sea Front activities 6.36

Respondent: Mr Michael Florey [3854] Agent: N/A

Full Text: Car parking IS an issue, but I cannot see this policy being implemented. e.g. What has already been done, is car

parking in Felixstowe has taken a big decline since space for this has been removed at an alarming rate. E.g. The Bloor houses off Langer road on has been built. This would be full of cars on a sunny Sunday, where are these cars to go now? if car parking is being replaced, it is without consideration for parking of cars, coaches and motorhomes. Car

parking has NOT been replaced, it has been removed!

Lack of car parking at Felixstowe ferry has always been a problem at peak times.

Tourism will suffer.

Summary: Car parking is not being replaced, which will result in a decline in tourism.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

S - 7153 - 744 - 6.36 - None

7153 Support

Tourism and Sea Front activities

6.36

Respondent: Historic England (Sir/ Madam) [744] Agent: N/A

Full Text: Re: Preferred Options Public Consultation (19th October - 30th November 2015)

Felixstowe Peninsula Area Action Plan

Thank you for your letter dated 15th October 2015 regarding the above consultation. We have had the opportunity to assess the letter and consultation documents and can offer the following. Please note we have provided comments on the Site Allocations and Area Specific Policies within a separate letter to you dated the same. This follows a previous consultation and our comments dated 25th February 2015.

In terms of our general comments:

Recent Guidance from Historic England

We have recently published guidance on the Historic Environment and Site Allocations. Where we have not made comment below some additional guidance on ensuring a positive strategy for the historic environment is secured within the Felixstowe Area Action Plan can be seen by following this link- http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/.

In terms of our site specific comments:

Housing Sites

FPP4: Land north of Walton High Street, Felixstowe (451g)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the possible impact on the setting of two Listed Buildings, Grade II* Listed Walton Hall and Grade II Listed 362 High Street. We highlighted that the principal elevation of Walton Hall faces north and overlooks site 451g. It was considered that development here would urbanise the setting of this important, highly designated heritage asset, resulting in harm to its significance. It was expressed that harm would also be caused to the Grade II lodge and we strongly advised that an alternative site was found for development, though it was thought that there may be scope for some limited development at the eastern end of this site. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. The policy does however highlight that the development will need to be sympathetic to the Listed Buildings found at Walton Hall and 362 High Street. Whilst this would go some way to allay our concerns we still recommend that whilst it is considered the site can take a level of development there would be a detrimental harm to the setting of the Listed Buildings if the whole site is developed. If the site is to remain in the plan we would advise that the western end of the site is left relatively undeveloped to help protect the setting and it is considered that this side of the site might lend itself to fulfil the Public Open Space requirement.

FFP5: Land north of Conway Close, Felixstowe (502e)

We welcome the acknowledgment of the Listed Buildings and the requirement that development will need to be sympathetic to the Listed Buildings within the policy. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FFP6: Land opposite Hand in Hand Public House, Trimley St Martin (451b)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of two Grade II Listed Buildings (the Hand in Hand public house and Nos 251 and 253 High Road). We highlighted that both these buildings are traditional vernacular structures that date back to the agrarian origins of the village, and their current proximity to open countryside contributes to their setting and significance. We therefore encouraged the Local Planning Authority to identify alternative sites if at all possible so that the setting of these two buildings might be protected. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. However, it is also acknowledged that the policy requires a village green to be included within the scheme. The village green is to front High Road in order to reduce the impact on the setting of the Hand in Hand public house and this is particularly welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP7: Land off Howlett Way, Trimley St Martin (451c and 451d)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of the two Grade II listed churches and the Grade II listed Old Rectory. Whilst it is acknowledged that the consideration of the setting of the rectory is included within the policy, and this is welcomed, we would advise that the setting of the churches is also included. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP8: Land off Thurmans Lane, Trimley St Mary (383f and 451f)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of Grade II Listed Building Mill Farmhouse. It is acknowledged that there is a requirement in the policy that the development will need to be sympathetic to the setting of the mill and this is welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

Town Centre

FFP14: Felixstowe Town Centre and FFP15: Retail Frontages

As outlined within our response to you dated 25th February 2015 it is considered these policies should cover

S - 7153 - 744 - 6.36 - None

7153 Support

Tourism and Sea Front activities

6.36

conservation and design issues. It is considered the policies should highlight the importance of retaining or restoring historic shopfront features both in terms of the positive contribution historic shopfronts make to the character of an area but also the economic benefit of providing traditional and bespoke shopping units to shopowners. A good example of how historic shopfronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a National success. The council have also seen a ripple effect of surrounding properties being restored. As well as including conservation and design issues within these policies the Council could consider additional advice within a Supplementary Planning Guide on Historic Shopfronts, especially given the importance and contribution the Historic shopping areas within the settlements of Suffolk make to the wider area.

District Centres

FPP17: District Centres

As above it is considered that this policy should cover conservation and design issues. It should highlight the contribution the Historic Environment makes to the economic success of district centres and seek to protect and enhance both the setting of historic assets and assets themselves.

Tourism and Sea Front Activities

We welcome the inclusion of a section which covers tourism and seafront activities. It is considered that point 6.03 on page 61 could also acknowledge and highlight the wider and more general positive contribution to Felixstowe that heritage tourism brings.

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FPP23: Car Parking

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We welcome the inclusion of a section on the Historic Environment which sits separately from landscape and ecological elements. We also welcome the section on Locally Listed Buildings and Features. It is considered the Historic Environment section should also highlight Felixstowe's archaeology.

It is acknowledged that no individual policies on the Historic Environment are proposed for the Area Action Plan itself, relying instead on saved policies within the Core Strategy and the National Planning Policy Framework. The Core Strategy does not have a specific historic environment policy, with certain aspects covered in other policies such as SP15 (Landscape and Townscape) and DM21 (Design Aesthetics) and policies for specific settlements. It is considered that there is a lack of a clear strategy relating to the Historic Environment, relating to local issues, at present, and we would encourage greater clarity. This should set out the Council's approach to the management of designated and non-designated heritage assets (including archaeology) and how issues such as heritage at risk will be tackled. It is considered that a Historic Environment Policy could be locally specific to cover the Felixstowe Peninsula Area Action Plan.

In addition to the above it is acknowledged that the issue of Felixstowe South Conservation Area At Risk is not being covered by the Plan. We therefore reiterate our previous comments as follows, it would be advantageous if the Area Action Plan identified specific policies to help remove it from the register. These might include utilising the conservation area appraisal to identify locally important buildings that contribute positively to the conservation area, and introduction Article 4 directives to protect such buildings. There may also be sites which are considered negative contributors to the character and appearance of the conservation area and the preparation of development briefs for such sites might help bring forward positive redevelopment. The conservation area survey identified the loss of architectural detail as a significant problem, and consideration might therefore be given to applying to the Heritage Lottery Fund for a Townscape Heritage programme for the area, or a smaller partnership scheme with Historic England to reinstate lost architectural details on key buildings. We would therefore still recommend the inclusion of a policy which tackles the issues at Felixstowe South Conservation Area.

FPP26: Areas to be Protected from Development

In our response to you dated 25th February 2015 we expressed concerns regard the inclusion of all the sites in Trimley St Martin which would in effect surround a number of Listed Buildings including Grade II listed churches, the Grade II listed Old Rectory and Grade II Listed Building Mill Farmhouse. We recommended the inclusion of an area to be protected from development which would protect the remaining green wedge and as a result protect the setting of a number of Listed Buildings. It is acknowledged that the green wedge within Trimley St Martin is proposed to be included within the Areas to be Protected from Development and this is particularly welcomed and supported.

FPP27: Historic Park and Garden

We welcome the inclusion and the content of this policy.

S - 7153 - 744 - 6.36 - None

7153 Support

Tourism and Sea Front activities

6.36

Other Issues

Coastal Change Management and Areas of Flooding

We welcome the inclusion of this section. It is considered this section should also contain a paragraph on issues and opportunities of climate change and flooding relating to the Historic Environment. Further guidance on flooding issues can be found here- http://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/.

For information and for further policy consultation please note our new consultation email address for the East of England, eastplanningpolicy@HistoricEngland.org.uk.

Summary:

We welcome the 'high quality of design' requirement relating to replacement car parking at point 6.36 on page 72. It is considered that this requirement should be included within the policy itself to give it more weight in decision making.

Change to Plan

N/A

Appear at exam? Not Specified

Legal? Not Specified

Sound? Not Specified

Duty to Cooperate? Not Specified

Soundness Tests

N/A

S - 6736 - 3782 - Preferred Policy FPP23: Car Parking - None

6736 Support

Tourism and Sea Front activities Preferred Policy FPP23: Car Parking

Respondent: Mary Wyatt [3782] Agent: N/A

Full Text: It is essential that any residential development such as Cliff House or the Waverley Hotel provides parking for

residents. Lack of parking will mean that tourists and shoppers will not come to Felixstowe.

Summary: It is essential that any residential development such as Cliff House or the Waverley Hotel provides parking for

residents. Lack of parking will mean that tourists and shoppers will not come to Felixstowe.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

C - 6890 - 3785 - Preferred Policy FPP23: Car Parking - None

6890 Comment

Tourism and Sea Front activities Preferred Policy FPP23: Car Parking

Respondent: Stephen Wyatt [3785] Agent: N/A

Full Text: Proposals for commercial, business or residential development in town centre locations should not be favoured if

adequate parking is not included. A recent change of use from hotel to apartments has actually taken away parking

spaces.

Summary: Proposals for commercial, business or residential development in town centre locations should not be favoured if

adequate parking is not included. A recent change of use from hotel to apartments has actually taken away parking

spaces

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6936 - 166 - Preferred Policy FPP23: Car Parking - None

6936 Comment

Tourism and Sea Front activities Preferred Policy FPP23: Car Parking

Respondent: Mrs Carol Florey [166] Agent: N/A

Full Text: Car parking is essential to the development of anything in Felixstowe. I support what is said but it isn't happening. The

seafront Martello tower development took away visitor parking. Recent seafront apartment developments have been

allowed despite limited parking - a resident being told they should use the local car park.

Car parking schemes to enhance retail in the town centre such as free parking after 4 were turned down by our council.

Car parking is essential. This preferred policy should be supported by our council as a priority

Summary: Car parking is essential to the development of anything in Felixstowe. I support what is said but it isn't happening. The

seafront Martello tower development took away visitor parking. Recent seafront apartment developments have been

allowed despite limited parking - a resident being told they should use the local car park.

Car parking schemes to enhance retail in the town centre such as free parking after 4 were turned down by our council.

Car parking is essential. This preferred policy should be supported by our council as a priority

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

S - 7304 - 3843 - Preferred Policy FPP23: Car Parking - None

7304 Support

Tourism and Sea Front activities Preferred Policy FPP23: Car Parking

Respondent: Felixstowe Chamber of Trade and Commerce

(Rachel Cronin) [3843]

Agent: N/A

Full Text:

RESPONSE OF FELIXSTOWE CHAMBER OF TRADE AND COMMERCE TO THE FELIXSTOWE PENINSULAR

AREA ACTION PLAN

FPP4

Felixstowe Chamber of Trade and Commerce supports development of new business units. Business units should consider light industrial and units for start-up businesses offering flexible terms.

The Chamber would also support modem eco design to suit the local environment.

FPP10

Felixstowe Chamber agrees with the policy to promote and safeguard land for employment, whether it relates to Port activities or otherwise. The development of Uniserve may increase the variety of employment opportunities not Port related.

FPP11 & 12

The Chamber supports the use of these area for start-up premises.

FPP14

The Chamber would wish the focus to extend to professional services on the ground floor as well as retail. It is as important for members of the public to access financial and legal services at ground level, particularly for those with disabilities. Many residents will expect such services to be located in the town centre for ease of access.

The Chamber supports the extension of the shared space and the improved connection between the town centre and the tourist centre. Retail in Felixstowe should be seen and promoted as part of the tourist offer.

FPP15

Again, the Chamber would seek an amendment to include reference to professional services being incorporated on the ground floor.

FPP21

The Chamber of Commerce supports the use of properties on the Sea Road to be resort related. The Chamber is concerned that residential and resort uses may conflict, in particular for car parking provision.

The Chamber of Commerce also supports any proposals which provide a link between the sea front and town centre.

FPP23

The Chamber supports the careful development of visitor car parking. Car parking should provide a clear town map with estimated distances on foot to tourist locations. The Chamber would support a one-day roaming ticket allowing visitors to park in any car park on the peninsular to encourage visitors to stay for the day and to explore the range of attractions.

Summary:

The Chamber supports the careful development of visitor car parking. Car parking should provide a clear town map with estimated distances on foot to tourist locations. The Chamber would support a one-day roaming ticket allowing visitors to park in any car park on the peninsular to encourage visitors to stay for the day and to explore the range of attractions.

Change to Plan N/A

Appear at exam?
Not Specified

Legal?
Not Specified

Sound?
Not Specified

Duty to Cooperate?Not Specified

Soundness Tests

N/A

Attachments:

C - 6776 - 3060 - Preferred Policy FPP24: Holiday accommodation - None

6776 Comment

Tourism and Sea Front activities

Preferred Policy FPP24: Holiday accommodation

Respondent: Felixstowe Town Council (Mr Ash Tadjrishi) [3060] Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Preferred Options Consultation

Thank you for the opportunity to respond to the Suffolk Coastal District Council Felixstowe Peninsula Area Action Plan Preferred Options paper. The Town Council considered this matter at its meeting of 11 November 2015.

Felixstowe Town Council was pleased to welcome and endorse the Felixstowe Peninsula Area Action Plan Preferred Options, subject to the following comments:

Page 13, Para. 2.02

We recommend adding the following to the end of the final sentence of this paragraph: ", as required by the July 2013 Local Plan."

Page 24, FPP3

Remove "(for residents and visitors)" from the bottom bullet relating to appropriate parking provision.

Page 26, Para. 3.30

This paragraph has been reduced in scope from an earlier draft and no longer references the unique location this site holds as a gateway to Felixstowe. It is vital that the policy ensures that any proposals for development of this site include appropriate consideration for this gateway and the statement this makes to those arriving to Felixstowe by road.

Page 27, FPP4

Remove "and Candlet Road" from the first bullet point. Any business units for this site should be restricted to the land adjacent to the A14 Dock Spur only.

Page 27, Title of 3.39

The title should read "Land" rather than "Lane" and include Swallow Close.

Page 29, FPP5

Please include Swallow Close and refer to this site as the "Land north of Conway Close and Swallow Close" throughout.

Page 49, Para. 5.06

Given the latest available information on these sites, this paragraph should be removed.

Page 50, Inset Map

The secondary shopping frontage should continue along Bent Hill on both sides of the road. It should also include the frontage of Trinity Methodist Church on Hamilton Road for consistency. Likewise the primary shopping area shaded in green should include this same section.

Page 51, Para. 5.10

Sentence should end "other than town centre uses".

Page 51, Para. 5.12

Please amend the final two sentences to read as follows:

"The scheme was not completed between Orwell Road and Bent Hill and the AAP will seek to encourage the continuation of the Shared Space along Hamilton Road. The completion of this scheme within the town centre boundary will provide a continuous link between Hamilton Road and Bent Hill and reinforce the connections between the town centre and the sea front."

Page 54, FPP15

Please amend the first paragraph to read "Any change of use proposals in this area should seek to retain a high proportion of retail activity."

Page 68, FPP21

Correction: "The provision of beach huts will be limited to those which currently exist. Any increased provision will be directed towards other parts of the sea front (namely Felixstowe Ferry Golf Club to Cobbolds Point Preferred Policy FPP19) as appropriate."

Page 74, FPP24

The policy should open with the following opening sentence:

"The need to strengthen Felixstowe as a seaside destination is recognised."

The next sentence should read: "Holiday accommodation will be encouraged and supported"

Page 82, FP27

This should be titled FPP27 rather than FP27.

C - 6776 - 3060 - Preferred Policy FPP24: Holiday accommodation - None

6776 Comment

Tourism and Sea Front activities

Preferred Policy FPP24: Holiday accommodation

Please revise the first line of text to read "Spa Gardens and Town Hall Gardens".

Appendix 7:Felixstowe, Trimley St. Mary & Trimley St. Martin Inset Map.

The Physical Limits boundary in regard to the seaward boundary should be drawn as in the 2001 Local Plan map - i.e disappear in to the sea rather than be drawn along the low water mark.

The dotted blue line denoting Proposed Tourism Areas is misleading and these areas should be marked out to define the landward extent and total area covered by those corresponding policies. Landguard peninsula should also be encapsulated whereas the line appears to end at Landguard point. As above, the lines between the areas should simply stop at the sea. The extensions of those lines into the sea can be wrongly interpreted as representing a policy as applying to an element of the sea.

The port area should be included within the Physical Limits boundary as is the case in the 2001 Local Plan map. The Physical Limits boundary in the Manor End area should include the caravan parks and Custom House, terminating at the boundary of Landguard Common.

The colouring of some of the designations on the main map are confusingly similar, notably those for the Proposed District Centre, the District Centre boundary and the revised Physical Limits boundary. Also, the use of very heavy lines at the scale of the main map is unhelpful.

Notwithstanding these observations, thank you for the opportunity to have been consulted. The Town Council looks forward to receiving information on the further development of the Area Action Plan.

Summary:

Page 74, FPP24

The policy should open with the following opening sentence:

"The need to strengthen Felixstowe as a seaside destination is recognised."

The next sentence should read: "Holiday accommodation will be encouraged and supported"

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

AAP Preferred Options Consultation Response.pdf

C - 7057 - 2600 - 7.01 - None

7057 Comment

Environment 7.01

Respondent: Deben Estuary Partnership (Christine Block) [2600] Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Preferred Options Consultation Document

Page 61

Tourism and Sea Front Activities Felixstowe Ferry and Golf Course

- * In the context of the Felixstowe Peninsula Area Action Plan objective 'to reduce vulnerability to flooding' the section relating to Felixstowe Ferry makes no reference to the substantial flood defence management issues which affect the mouth of the Deben Estuary and, therefore, the future of this area including the Ferry hamlet.

 This could be addressed by referring to the Deben Estuary Plan Estuary Policy Areas Flood Defence Management Page 26 Felixstowe Ferry Estuary Defence
- * This section makes no reference to the seasonal foot ferry between Felixstowe Ferry and Bawdsey Ferry. This is favoured by tourists (22,000 passengers in 2015). It provides important access to the internationally significant Radar Museum at Bawdsey Manor, offers a link in the net work of national cycle trails and will be important as part of the national coastal trail.

Page 76

Environment

- 7.01 'minimising the impact of new development on sites identified as internationally important for nature conservation 'Justification for minimising and mitigating the impact of new development should not only consider designated sites but include reference to conserving and enhancing the landscape and characteristic features of the Deben Estuary, valuing the landscape of the Felixstowe Peninsula as seen from the river, ensuring that new build is sensitive to the estuary topography and lessening light pollution in areas where lights will be visible from across a wide estuary area. (The quality of the landscape, the biodiversity and 'peace and tranquillity' of the estuary environment are recognised as one of the main reasons visitors choose to stay in the area.)
- 7.02 Reference to importance of high quality agricultural land to the north of Felixstowe. The importance lies not so much in the grade of land but in the combination of light soils, mild climate and access to irrigation which allows early and late vegetable cropping now of national importance.

7.03 Reference to mitigating the impact of future development - targeted mitigation measures are also noted in the Deben Estuary Plan. Disturbance of the hinterland feeding and roosting areas of the species listed in connection with SPA / RAMSAR designations - ie behind the intertidal estuary - may also require mitigation.

Page 84

Other issues

* The area covered by the Felixstowe Peninsula Area Action Plan includes a section of the Deben Estuary but no mention is made to the significant flood defence issues which apply to the mouth and lower reaches of the river. This could be addressed by referring to the Deben Estuary Plan.

Page 93

Saved policies

AP 191 Felixstowe: Houseboats at Felixstowe

- * The Deben Estuary Plan notes the character that houseboats bring to parts of the river but puts forward guidelines which aim to establish common criteria across the whole estuary.. At the moment policies cover Felixstowe / Melton / and Woodbridge but ignore houseboats at Martlesham Creek.
- * Under 'How these policy issues are now being dealt with' reference should be made to the endorsed Deben Estuary

Summary:

Justification for minimising and mitigating the impact of new development should not only consider designated sites but include reference to conserving and enhancing the landscape and characteristic features of the Deben Estuary, valuing the landscape of the Felixstowe Peninsula as seen from the river, ensuring that new build is sensitive to the estuary topography and lessening light pollution in areas where lights will be visible from across a wide estuary area. (The quality of the landscape, biodiversity and 'peace and tranquillity' of the estuary environment are recognised as one of the main reasons visitors choose to stay in the area.)

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

C - 7154 - 744 - 7.01 - None

7154 Comment

Environment 7.01

Respondent: Historic England (Sir/ Madam) [744] Agent: N/A

Full Text: Re: Preferred Options Public Consultation (19th October - 30th November 2015)

Felixstowe Peninsula Area Action Plan

Thank you for your letter dated 15th October 2015 regarding the above consultation. We have had the opportunity to assess the letter and consultation documents and can offer the following. Please note we have provided comments on the Site Allocations and Area Specific Policies within a separate letter to you dated the same. This follows a previous consultation and our comments dated 25th February 2015.

In terms of our general comments:

Recent Guidance from Historic England

We have recently published guidance on the Historic Environment and Site Allocations. Where we have not made comment below some additional guidance on ensuring a positive strategy for the historic environment is secured within the Felixstowe Area Action Plan can be seen by following this link- http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/.

In terms of our site specific comments:

Housing Sites

FPP4: Land north of Walton High Street, Felixstowe (451g)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the possible impact on the setting of two Listed Buildings, Grade II* Listed Walton Hall and Grade II Listed 362 High Street. We highlighted that the principal elevation of Walton Hall faces north and overlooks site 451g. It was considered that development here would urbanise the setting of this important, highly designated heritage asset, resulting in harm to its significance. It was expressed that harm would also be caused to the Grade II lodge and we strongly advised that an alternative site was found for development, though it was thought that there may be scope for some limited development at the eastern end of this site. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. The policy does however highlight that the development will need to be sympathetic to the Listed Buildings found at Walton Hall and 362 High Street. Whilst this would go some way to allay our concerns we still recommend that whilst it is considered the site can take a level of development there would be a detrimental harm to the setting of the Listed Buildings if the whole site is developed. If the site is to remain in the plan we would advise that the western end of the site is left relatively undeveloped to help protect the setting and it is considered that this side of the site might lend itself to fulfil the Public Open Space requirement.

FFP5: Land north of Conway Close, Felixstowe (502e)

We welcome the acknowledgment of the Listed Buildings and the requirement that development will need to be sympathetic to the Listed Buildings within the policy. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FFP6: Land opposite Hand in Hand Public House, Trimley St Martin (451b)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of two Grade II Listed Buildings (the Hand in Hand public house and Nos 251 and 253 High Road). We highlighted that both these buildings are traditional vernacular structures that date back to the agrarian origins of the village, and their current proximity to open countryside contributes to their setting and significance. We therefore encouraged the Local Planning Authority to identify alternative sites if at all possible so that the setting of these two buildings might be protected. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. However, it is also acknowledged that the policy requires a village green to be included within the scheme. The village green is to front High Road in order to reduce the impact on the setting of the Hand in Hand public house and this is particularly welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP7: Land off Howlett Way, Trimley St Martin (451c and 451d)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of the two Grade II listed churches and the Grade II listed Old Rectory. Whilst it is acknowledged that the consideration of the setting of the rectory is included within the policy, and this is welcomed, we would advise that the setting of the churches is also included. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP8: Land off Thurmans Lane, Trimley St Mary (383f and 451f)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of Grade II Listed Building Mill Farmhouse. It is acknowledged that there is a requirement in the policy that the development will need to be sympathetic to the setting of the mill and this is welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

Town Centre

FFP14: Felixstowe Town Centre and FFP15: Retail Frontages

As outlined within our response to you dated 25th February 2015 it is considered these policies should cover

C - 7154 - 744 - 7.01 - None

7154 Comment

Environment 7.01

conservation and design issues. It is considered the policies should highlight the importance of retaining or restoring historic shopfront features both in terms of the positive contribution historic shopfronts make to the character of an area but also the economic benefit of providing traditional and bespoke shopping units to shopowners. A good example of how historic shopfronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a National success. The council have also seen a ripple effect of surrounding properties being restored. As well as including conservation and design issues within these policies the Council could consider additional advice within a Supplementary Planning Guide on Historic Shopfronts, especially given the importance and contribution the Historic shopping areas within the settlements of Suffolk make to the wider area.

District Centres

FPP17: District Centres

As above it is considered that this policy should cover conservation and design issues. It should highlight the contribution the Historic Environment makes to the economic success of district centres and seek to protect and enhance both the setting of historic assets and assets themselves.

Tourism and Sea Front Activities

We welcome the inclusion of a section which covers tourism and seafront activities. It is considered that point 6.03 on page 61 could also acknowledge and highlight the wider and more general positive contribution to Felixstowe that heritage tourism brings.

FFP18: Felixstowe Ferry and Golf Course, FFP19: Felixstowe Ferry Golf Club to Cobbolds Point, FPP20: Cobbolds Point to Spa, FPP21: Spa to Martello Park and FFP22 Martello Park to Landguard We welcome and support the acknowledgement and required protection of the historic qualities of these sections of the coast

FPP23: Car Parking

We welcome the 'high quality of design' requirement relating to replacement car parking at point 6.36 on page 72. It is considered that this requirement should be included within the policy itself to give it more weight in decision making.

The Environment

We welcome the inclusion of a section on the Historic Environment which sits separately from landscape and ecological elements. We also welcome the section on Locally Listed Buildings and Features. It is considered the Historic Environment section should also highlight Felixstowe's archaeology.

It is acknowledged that no individual policies on the Historic Environment are proposed for the Area Action Plan itself, relying instead on saved policies within the Core Strategy and the National Planning Policy Framework. The Core Strategy does not have a specific historic environment policy, with certain aspects covered in other policies such as SP15 (Landscape and Townscape) and DM21 (Design Aesthetics) and policies for specific settlements. It is considered that there is a lack of a clear strategy relating to the Historic Environment, relating to local issues, at present, and we would encourage greater clarity. This should set out the Council's approach to the management of designated and non-designated heritage assets (including archaeology) and how issues such as heritage at risk will be tackled. It is considered that a Historic Environment Policy could be locally specific to cover the Felixstowe Peninsula Area Action Plan.

In addition to the above it is acknowledged that the issue of Felixstowe South Conservation Area At Risk is not being covered by the Plan. We therefore reiterate our previous comments as follows, it would be advantageous if the Area Action Plan identified specific policies to help remove it from the register. These might include utilising the conservation area appraisal to identify locally important buildings that contribute positively to the conservation area, and introduction Article 4 directives to protect such buildings. There may also be sites which are considered negative contributors to the character and appearance of the conservation area and the preparation of development briefs for such sites might help bring forward positive redevelopment. The conservation area survey identified the loss of architectural detail as a significant problem, and consideration might therefore be given to applying to the Heritage Lottery Fund for a Townscape Heritage programme for the area, or a smaller partnership scheme with Historic England to reinstate lost architectural details on key buildings. We would therefore still recommend the inclusion of a policy which tackles the issues at Felixstowe South Conservation Area.

FPP26: Areas to be Protected from Development

In our response to you dated 25th February 2015 we expressed concerns regard the inclusion of all the sites in Trimley St Martin which would in effect surround a number of Listed Buildings including Grade II listed churches, the Grade II listed Old Rectory and Grade II Listed Building Mill Farmhouse. We recommended the inclusion of an area to be protected from development which would protect the remaining green wedge and as a result protect the setting of a number of Listed Buildings. It is acknowledged that the green wedge within Trimley St Martin is proposed to be included within the Areas to be Protected from Development and this is particularly welcomed and supported.

FPP27: Historic Park and Garden

We welcome the inclusion and the content of this policy.

C - 7154 - 744 - 7.01 - None

7154 Comment

Environment 7.01

Other Issues

Coastal Change Management and Areas of Flooding

We welcome the inclusion of this section. It is considered this section should also contain a paragraph on issues and opportunities of climate change and flooding relating to the Historic Environment. Further guidance on flooding issues can be found here- http://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/.

For information and for further policy consultation please note our new consultation email address for the East of England, eastplanningpolicy@HistoricEngland.org.uk.

Summary:

It is acknowledged that no individual policies on the Historic Environment are proposed for the Area Action Plan itself, relying instead on saved policies within the Core Strategy and the National Planning Policy Framework. The Core Strategy does not have a specific historic environment policy, with certain aspects covered in other policies. In addition it is acknowledged that the issue of Felixstowe South Conservation Area At Risk is not being covered by the Plan. It would be advantageous if the Area Action Plan identified specific policies to help remove it from the register.

Change to Plan

It is considered that there is a lack of a clear strategy relating to the Historic Environment, relating to local issues, at present, and we would encourage greater clarity. This should set out the Council's approach to the management of designated and non-designated heritage assets (including archaeology) and how issues such as heritage at risk will be tackled. It is considered that a Historic Environment Policy could be locally specific to cover the Felixstowe Peninsula Area Action Plan

Appear at exam?
Not Specified

Legal?
Not Specified

Sound?
Not Specified

Duty to Cooperate?Not Specified

Soundness Tests

None

O - 6786 - 2549 - 7.02 - None

6786 Object

Environment 7.02

Respondent: Mrs Judith Hedges [2549] Agent: N/A

Full Text: Here are my comments on:-

Felixstowe Peninsula Area Action Plan Preferred Options

Paragraph 3.39

I object to building on the land to the north of Conway Close because

- 1. Gulpher Road and the eastern leg of Ferry Road are Felixstowe's only quiet country lanes enjoyed by walkers, cyclists, horseriders and sight seeing cars for those not able to be active. To build on this site would increase the traffic flow such this would no longer be possible.
- 2. There is already severe congestion at the Ferry Rd entrance to Kingsfleet School at arrival and departure times. This would increase to an intolerable level with more housing.
- 3. Gulpher Road is too narrow to handle extra traffic from new housing on this site.
- 4 At present there is a very pleasant countryside footpath walk through The Grove, into Hyems Lane, across the field north of Conway Close, across the field by the Ferry Rd allotments to the pill box and then a short walk down the quieter section of Ferry Rd to the coast at the Golf Club. If the field north of Conway Close is developed and even if a right of way is preserved this walk will then be partly on a hard surfaced urban pathway and loose its attraction. Felixstowe has very few countryside footpath walks it is essential they are maintained. To walk along our footpaths is a superb experience. The views and countryside sights and smells are pure escapism and at present they are on our doorstep, It is our duty to keep them available for future generations.

Paragraph 7.02

I object to the last sentence of this paragraph. It should state that the high quality agriculture land and countryside north of Felixstowe IS to be protected. It should not say 'where possible'. We are custodians of our environment, town and countryside, for future generations and as such we must plan with them in mind not just for our needs for the next couple of decades. The area between the red district centre boundary and the length of Gulpher Road and the eastern leg of Ferry Road(nth of allotments) needs to be included in the area that needs to be protected from development. This may mean that the red district centre boundary needs to be moved to Gulpher Road so that the protected area is included

It is essential that high quality agricultural land is preserved to help our country be self supporting as much as possible. Preserving agricultural land is also essential for our wellbeing. We have evolved to live off the land and in touch with the land. To continue with urbanisation of our environment will prove to be disastrous for our well being and expensive for society. In Felixstowe we are far more fortunate than people in many, many other towns and cities but that does not mean we should start loosing our countryside in the way they have lost their countryside. The Green Belt is essential for all and should be sacrosanct. We seem to pay more attention to countries loosing their big mammals than us loosing our small mammals. We have already lost our big mammals and birds. We must now look to keeping linked countryside areas for our fast disappearing stoats, weasels, hedgehogs, badgers, owls, greenfinches and our meadow and woodland wildflowers and native trees. Two facts amaze me, 1. I have never seen a tree sparrow and 2. you can count on one hand how many black poplar trees survive in our locality. It will be a sad day when future generations only see an owl or a hedgehog in a nature book

Paragraph 7.06

We are indeed short of woodland.

An area needs to be marked on the plan for woodland development in the same way as areas are marked out for housing, retail etc. If left to be considered as part of housing development plans then no substantial or connected woodlands will appear. Woodlands need to be connected to offer large enough territories for wildlife to thrive. In Felixstowe we are fortunate in having The Grove and Abbey Grove on our doorstep. Both woodlands are open to the public 24/7. These woods are cared for by volunteers under SCDC and the Woodland Trust respectively to provide a mixture of wildlife habitats combined with providing beautiful areas for the public to enjoy. Both these areas are small, too small for many small mammals to thrive. If the land connecting and between these two woodlands was converted to woodland then Felixstowe would have a woodland to be proud of, for people to enjoy and for wildlife to thrive and multiply. May be this land could be purchased between the community, Woodland Trust and developers in the town. Appendix 7

The area between the red district centre boundary and the length of Gulpher Road and the eastern leg of Ferry Road(nth of allotments) needs to be included in the area that needs to be protected from development. This may mean that the red district centre boundary needs to be moved to Gulpher Road so that the protected area is included. We are custodians of our environment, town and countryside, for future generations and as such we must plan with them in mind not just for our needs for the next couple of decades. They must be allowed to enjoy the environment that we have enjoyed. It is essential that high quality agricultural land is preserved to help our country be self supporting as much as possible. Preserving agricultural land is also essential for our wellbeing. We have evolved to live off the land and in touch with the land. To continue with urbanisation of our environment will prove to be disastrous for our well being and expensive for society. In Felixstowe we are far more fortunate than people in many, many other towns and cities but that does not mean we should start loosing our countryside in the way they have lost their countryside. The Green Belt is essential for all and should be sacrosanct. We seem to pay more attention to countries loosing their big mammals than us loosing our small mammals. We have already lost our big mammals and birds. We must now look to keeping linked countryside areas for our fast disappearing stoats, weasels, hedgehogs, badgers, owls, greenfinches and our meadow and woodland wildflowers and native trees. Two facts amaze me, 1. I have never seen a tree sparrow and 2. you can count on one hand how many black poplar trees survive in our locality. It will be a sad day when future generations only see an owl or a hedgehog in a nature book.

Many thanks for all your work on this plan

O - 6786 - 2549 - 7.02 - None

6786 Object

Environment 7.02

Summary: I object to the last sentence of this paragraph. It should state that the high quality agriculture land and countryside north

of Felixstowe IS to be protected. It should not say 'where possible'. We are custodians of our environment, town and countryside, for future generations; as such we must plan with them in mind not just for our needs for the next couple of decades. The area between the red district centre boundary and the length of Gulpher Road and the eastern leg of

Ferry Road needs to be included in the area that needs to be protected from development.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6905 - 3234 - 7.02 - None

6905 Object

Environment 7.02

Respondent: Mrs Julie Cornforth [3234] Agent: N/A

Full Text: You state that the Core Strategy highlights the importance of high quality (GRADE 1) agricultural land to the north of

Felixstowe and the surrounding countryside which where possible is to be protected.

Summary: You state that the Core Strategy highlights the importance of high quality (GRADE 1) agricultural land to the north of

Felixstowe and the surrounding countryside which where possible is to be protected.

Change to Plan So why do you want to build on the land north of Conway Close, Fxt. The area to be built on is also in Gulpher Road

(Quiet Lane) and Ferry Road. It doesn't make sense. Also, why have you altered the town boundary to include

the end of Gulpher Road?

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7058 - 2600 - 7.02 - None

7058 Comment

Environment 7.02

Respondent: Deben Estuary Partnership (Christine Block) [2600] Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Preferred Options Consultation Document

Page 61

Tourism and Sea Front Activities Felixstowe Ferry and Golf Course

- * In the context of the Felixstowe Peninsula Area Action Plan objective 'to reduce vulnerability to flooding' the section relating to Felixstowe Ferry makes no reference to the substantial flood defence management issues which affect the mouth of the Deben Estuary and, therefore, the future of this area including the Ferry hamlet.

 This could be addressed by referring to the Deben Estuary Plan Estuary Policy Areas Flood Defence Management Page 26 Felixstowe Ferry Estuary Defence
- * This section makes no reference to the seasonal foot ferry between Felixstowe Ferry and Bawdsey Ferry. This is favoured by tourists (22,000 passengers in 2015). It provides important access to the internationally significant Radar Museum at Bawdsey Manor, offers a link in the net work of national cycle trails and will be important as part of the national coastal trail.

Page 76

Environment

7.01 'minimising the impact of new development on sites identified as internationally important for nature conservation 'Justification for minimising and mitigating the impact of new development should not only consider designated sites but include reference to conserving and enhancing the landscape and characteristic features of the Deben Estuary, valuing the landscape of the Felixstowe Peninsula as seen from the river, ensuring that new build is sensitive to the estuary topography and lessening light pollution in areas where lights will be visible from across a wide estuary area. (The quality of the landscape, the biodiversity and 'peace and tranquillity' of the estuary environment are recognised as one of the main reasons visitors choose to stay in the area.)

7.02 Reference to importance of high quality agricultural land to the north of Felixstowe. The importance lies not so much in the grade of land but in the combination of light soils, mild climate and access to irrigation which allows early and late vegetable cropping - now of national importance.

7.03 Reference to mitigating the impact of future development - targeted mitigation measures are also noted in the Deben Estuary Plan. Disturbance of the hinterland feeding and roosting areas of the species listed in connection with SPA / RAMSAR designations - ie behind the intertidal estuary - may also require mitigation.

Page 84

Other issues

* The area covered by the Felixstowe Peninsula Area Action Plan includes a section of the Deben Estuary but no mention is made to the significant flood defence issues which apply to the mouth and lower reaches of the river. This could be addressed by referring to the Deben Estuary Plan.

Page 93

Saved policies

AP 191 Felixstowe: Houseboats at Felixstowe

- * The Deben Estuary Plan notes the character that houseboats bring to parts of the river but puts forward guidelines which aim to establish common criteria across the whole estuary.. At the moment policies cover Felixstowe / Melton / and Woodbridge but ignore houseboats at Martlesham Creek.
- * Under 'How these policy issues are now being dealt with' reference should be made to the endorsed Deben Estuary

Summary:

Reference to importance of high quality agricultural land to the north of Felixstowe. The importance lies not so much in the grade of land but in the combination of light soils, mild climate and access to irrigation which allows early and late vegetable cropping - now of national importance.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7059 - 2600 - 7.03 - None

7059 Comment

Environment 7.03

Respondent: Deben Estuary Partnership (Christine Block) [2600] Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Preferred Options Consultation Document

Page 61

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Page 76

Environment

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Summary:

Reference to mitigating the impact of future development - targeted mitigation measures are also noted in the Deben Estuary Plan. Disturbance of the hinterland feeding and roosting areas of the species listed in connection with SPA / RAMSAR designations - ie behind the intertidal estuary - may also require mitigation.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7318 - 2605 - 7.04 - None

7318 Comment

Environment 7.04

Respondent: Suffolk Wildlife Trust (Mr James Meyer) [2605] Agent: N/A

Full Text: RE: Suffolk Coastal DC Site Allocations and Area Specific Policies Local Plan

Document Preferred Options Consultation and Felixstowe Area Action Plan Preferred Options Consultation

Thank you for consulting us on the above documents. We have the following comments on the sites identified for allocation (or otherwise) presented in the map booklets and on the settlement boundary changes proposed. These comments are based on a desktop assessment of the sites in relation to the presence of areas designated for their nature conservation value, we have not screened these sites for the potential presence of protected species or the potential presence of Priority species or habitats. It is possible that sites included for allocation could support protected species and/or Priority species or habitats and we recommend that this is investigated in detail as the development plan process progresses.

Site Allocations Preferred Options Document

A number of sites proposed for allocation appear to incorporate areas of semi-natural habitat, for example sites at Westerfield and Witnesham (Chapel). Such sites should not be allocated until their biodiversity value has been established. In addition, policies for all site allocations should ensure that all development delivers ecological gain in accordance with the requirements of the National Planning Policy Framework (NPPF) (section 110).

The document also includes a number of settlement boundary amendments. Whilst we support the redrawing of boundaries to tighten them around existing development, there are a number of settlements where the boundary has been extended to take in new areas for development. Of particular concern are extensions at Bawdsey and Rushmere St Andrew where ecological surveys accompanying recent planning applications have demonstrated that the areas have existing biodiversity value. This evidence should be taken in to account

through the Local Plan process and settlement boundaries should not be amended to take in areas which are of existing biodiversity value.

It is also noted that a settlement boundary is proposed around existing development to the south of Hollesley (Alderton Road/Bushy Lane) which does not currently lie within such a boundary. Designation of such a boundary area would potentially allow further development which may result in an adverse ecological impact. The plan should not allow for development which is likely to result in such impacts.

All site allocation policies should also seek ecological enhancements as part of any new development.

Felixstowe Area Action Plan (AAP) Preferred Options Document

A number of the policies in the draft AAP have negative scores for the biodiversity

Sustainability Appraisal indicator (indicator 17). It is unclear how this will be addressed and a plan should not be put forward which results in an overall negative impact on biodiversity, as such this would not be in conformity with the NPPF. For example policy FPP2 scores negatively on the environmental Sustainability Appraisal criteria and it is unclear how allocation of this site would address this. Paragraph 110 of the NPPF requires that plans should aim to minimise adverse effects on the local and natural environment and should allocate land with the least environmental value.

It is also noted that the draft AAP proposes the allocation of sites in Walton; Trimley St Mary and Trimley St Martin. A number of these sites have previously had ecological surveys carried out on them as part of planning applications which has identified that they have biodiversity value. It is unclear how the policies which are proposed to allocate these sites address this issue. It is also unclear whether the cumulative impact of developing all the proposed sites has been assessed. In accordance with the NPPF (paragraph 110) only land with the least environmental value should be allocated.

A number of the policies in the draft AAP include the following text:

"Suffolk Wildlife Trust have identified that the site is within a Suffolk Wildlife Trust consultation area and any future development on this site will need to ensure that issues can be resolved or mitigated through appropriate design". We do not set 'consultation areas' and are unclear where this concept has come from. We therefore request that reference to this is removed from the AAP. It should also be ensured that where sites are to be allocated, the LPA are certain that "issues can be resolved or mitigated through appropriate design". Where there is uncertainty that biodiversity impacts can be mitigated the site should not be allocated, in accordance with the requirements of the NPPF. The AAP should also seek ecological enhancements as part of any new development.

Green Infrastructure

New development brings increased demand for green space, the evidence for green infrastructure planning in the district is currently underpinned by the Haven Gateway Green Infrastructure Strategy (The Landscape Partnership, 2008) and a Green Infrastructure Strategy (The Landscape Partnership, 2011) for the area within the district outside of the Haven Gateway Area. The site allocations process should be used as a mechanism for the implementation of such strategies. As both of these documents are a number of years old we recommend that as part of the development plan process they are updated and that a single plan is produced to cover the whole district. Such a plan should also take account of green infrastructure in neighbouring districts and boroughs in order to produce a plan at a strategic scale.

Habitats Regulations Assessment (HRA)

The Habitats Regulations Assessment (HRA) of the Site Allocations Preferred Options identifies further work that is required to assess the impacts of several parts of the plan on sites of European nature conservation importance. Such assessment should be undertaken prior to the council's Preferred Options being progressed in order to determine whether they are likely to result in significant adverse effects on such nature conservation sites.

The HRA report discounts potential impacts from a number of the proposed sites as they are perceived to be outside of

C - 7318 - 2605 - 7.04 - None

7318 Comment

Environment 7.04

walking distance from a European designated site. However, the study does not appear to take account of travel by car from new developments to European designated sites. Prior to the allocation of any new development sites this factor must be addressed to ensure that development of allocated sites, both alone and in-combination, is not likely to result in adverse impacts on any European designated sites. Unless this matter is

adequately addressed we do not consider that the plan can be demonstrated to be 'sound'.

The HRA of the Council's adopted Core Strategy DPD also identified a number of measures which were required in order to prevent increased recreational pressure from resulting in a likely significant effect on sites of European nature conservation importance. It should therefore be ensured that these measures are incorporated in to the Site Allocations and Felixstowe AAP documents, with the impacts of the proposals within these documents then assessed accordingly. If you require any further information or wish to discuss any of the points raised above please do not hesitate to contact us.

Summary:

New development brings increased demand for green space, the evidence for green infrastructure planning in the district is currently underpinned by the Haven Gateway Green Infrastructure Strategy (The Landscape Partnership, 2008) and a Green Infrastructure Strategy (The Landscape Partnership, 2011) for the area within the district outside of the Haven Gateway Area. The site allocations process should be used as a mechanism for the implementation of such strategies.

Change to Plan

As both of these documents are a number of years old we recommend that as part of the development plan process they are updated and that a single plan is produced to cover the whole district. Such a plan should also take account of green infrastructure in neighbouring districts and boroughs in order to produce a plan at a strategic scale.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

Suffolk Coastal Site Allocations Preferred Options.pdf

C - 6814 - 2839 - 7.05 - None

6814 Comment

Environment 7.05

Respondent: RSPB (Jacqui Miller) [2839] Agent: N/A

Full Text: Re: Site Allocations and Area Specific Policies - Preferred Options Consultation

Thank you for consulting the RSPB regarding the Preferred Options Consultation. Please find our comments below.

Site Allocations and Area Specific Policies DPD - Preferred Options Consultation Document

Introduction

Paras. 106-107 and Policy SSP1 refer to the planning application at Adastral Park. It should be noted that at this stage, there cannot be confidence that the application and its associated green space provision will be realised, as the application is as yet undetermined. Therefore this project should not be relied upon to provide mitigation for recreational pressure on European sites through the provision of green space for the district as a whole.

SSP3 Land to the rear of Rose Hill, Saxmundham Road, Aldeburgh (SHLAA ref 608)

We have previously raised concerns (in our response of 26th February 2015 to the Issues and Options consultation) about this site regarding its proximity to the Alde-Ore Estuary SPA and Ramsar site, however, this was on the basis of 69-108 houses. A reduction to ten houses plus a care home may reduce concerns, but this restriction should be clearly worded (as an upper limit) into the resulting policy (SSP3). At present it is not clear whether the requirement is for less than ten units (as in the excerpt from the Sustainability Appraisal) or 'around ten' as in para. 2.23. As noted in the Habitats Regulations Assessment (HRA), the status and use of the access route to the estuary should be clarified, and the provision of alternative open space considered. It should be noted that, if an application is brought forward for this site, HRA at the project level will be required, and proposals for mitigation should be included in plans for any development.

We support the rejection of alternative option site 982. We note that Appendix 3 indicates that this site was rejected due to potential effects on the Alde-Ore Estuary SPA (in line with our comments). This should be recognised here.

SSP10 Land west of Garden Square Rendlesham

We support the requirement to provide open space for daily dog walking as an alternative to the more sensitive Tunstall and Rendlesham Forests (part of the Sandlings SPA).

SSP22 Bentwaters Park, Rendlesham

We note that the policy refers to the sensitivities of this site within the AONB. This policy should also recognise that Bentwaters Parks adjoins the Sandlings SPA and is in close proximity to the Alde-Ore Estuary SPA, SAC and Ramsar site. It will be necessary to consider potential effects on these designated wildlife sites when making decisions as to future activities on this site.

Section 5 - Tourism

References to Natura 2000 sites in para. 5.02 should include the Sandlings, as well as the estuaries.

Policy SSP30 proposes a restriction on public car parking within 1km of the Deben Estuary as mitigation against increases in recreational pressure resulting from the in-combination effects of housing proposals in the area. Whilst we support some restrictions on new parking provision, we suggest this should focus on provision relating to activities likely to cause most disturbance and/or locations that are most sensitive to disturbance. Seasonal restrictions could also be considered, based on the presence of sensitive species. We are also concerned that purely restricting access does not encourage responsible behaviour and enjoyment of and respect for the natural environment. We therefore recommend that consideration is given to a range of mitigation measures which could be funded through a formalised developer contributions scheme. The Council should consider those measures proposed in the Deben Estuary Plan, with examples including:

□ seasonally adapted routes including diversions if necessary
□ screening of routes
□ provision of information to visitors - signage, interpretation, community events to educate people about the
importance of the area and responsible visiting
□ gates preventing dogs running ahead
□ bunds and hides etc to screen birds from visitors in sensitive areas
□ managing visitor numbers during busy periods through charging and parking restrictions
□ quidance for dog walkers and river users (e.g. through codes of conduct)
□ a wardening scheme
an ongoing visitor management plan - including provision for monitoring of impacts and review of mitigation

As noted in para. 5.05 of the Site Allocations and Area Specific Policies DPD, this approach should be complemented with provision of areas of attractive alternative green space, including areas suitable for dog walking, within individual

C - 6814 - 2839 - 7.05 - None

6814 Comment

Environment 7.05

development sites.

SSP31 Snape Maltings

While para. 5.06 refers to the conservation importance of the area within which Snape Maltings is set, the policy itself does not. We recommend that the sentence requiring that all proposals should seek to protect and enhance the special character and interest of the heritage assets should be amended to include the natural environment as well.

Section 6 Recreation and Green Infrastructure

We are pleased that the Haven Gateway Green Infrastructure Strategy (HAGGIS) has recently been updated, however, this update does not appear to be available for review. In our previous comments of 26th February 2015 on the Issues and Options consultation, we recommended that the 2011 Green Infrastructure Strategy for the Suffolk Coastal district is also updated. We commented that:

"At present the district Green Infrastructure Strategy appears focused on recreational provision. Whilst important, we consider that there is also an opportunity to expand the Strategy to include biodiversity targets. This should aim to create networks of sites of biodiversity value that 'fill the gaps' between existing green space features and sites of importance for biodiversity. Joined up networks are more functional and allow species to move between sites, helping them to adapt to the likely effects of climate change. We recommend that the currently available maps of priority habitat types are supplemented by map(s) showing designated sites (including international sites, SSSIs and County Wildlife Sites). These maps of current biodiversity resource can then be used to identify those areas which could be targeted for restoration, buffering or linkage through habitat creation or restoration."

RSPB response to Suffolk Coastal District Council Site Allocations and Area Specific Policies Issues and Options Consultation, 26th February 2015

These comments are still relevant. We also recommend that the outputs from the HAGGIS update and an update to the Suffolk Coastal Green Infrastructure Strategy should be consolidated into an SPD setting out a district-wide strategy, alongside standards for green infrastructure provision within developments. The production of an SPD would clarify and formalise requirements and ensure that there is one easily accessible set of targets and standards for the district.

Section 7 - Environment

Para. 7.03 discusses potential mitigation required as a result of increased recreational pressure. It should be clarified that this mitigation is with regard to impacts on designated European conservation sites (SPAs, SACs and Ramsar sites).

New site 3007 Saxmundham sub area (Land to south east of Blythburgh Road)

We agree with the rejection of this site due to the acknowledged potential for impact on the Minsmere-Walberswick SPA, SAC and SSSI.

New site 3024 Saxmundham sub area (Land off Aldringham Road)

We agree with the rejection of this site due to the acknowledged potential impact on the Sandlings SPA and SSSI.

Habitats Regulations Assessment for Site Allocations and Area Specific Policies DPD

Para 2.3.2 states that the assessment of the Suffolk Coastal Core Strategy found no adverse effect on the integrity of any European site. This should be clarified to state that this is dependent on the provision of mitigation to address recreational pressure as a result of housing numbers. Without such mitigation, adverse effects on integrity would result.

Para. 3.3.3 refers to a Green Infrastructure Plan under consideration by Suffolk Coastal District and Ipswich Borough. As stated in our comments above, we consider that this work should be formalised within an SPD.

Para. 3.3.3 also refers to a country park proposed as part of the Adastral Park development. As stated above, there cannot be confidence that the application and its associated green space provision will be realised, as the application is as yet undetermined.

We agree with the assessment in para. 3.4.2 that policies SSP3 Land to the rear of Rose Hill, Saxmundham Road, Aldeburgh and SSP31 Snape Maltings could have a Likely Significant Effect on European sites.

We support the conclusion in para. 3.4.15 that a visitor disturbance study is required for the Alde-Ore Estuary in order to understand possible impacts from Policy SSP31 Snape Maltings. As noted in para. 3.5.1, both the policies resulting in Likely Significant Effect relate to the Alde-Ore Estuary, hence a disturbance study could also aid assessment of SSP3 Land to rear of Rose Hill, Saxmundham Road, Aldeburgh and any future developments close to the estuary.

Para. 3.4.16 refers to the proposed restriction in new car parking around the Deben Estuary and opportunities to apply this policy to other European Sites. We recommend the approach suggested above (see comments on Section 5 -

C - 6814 - 2839 - 7.05 - None

6814 Comment

Environment 7.05

Tourism) for the Deben Estuary, and that consideration should be given to a similar scheme for other European sites (potentially including the Alde-Ore Estuary, dependant on the results of the proposed disturbance study).

We support the statement in para. 3.6.3 that the proposed development of Adastral Park will require its own project level HRA

The discussion of SSP38 Coastal Change Management Area in Appendix 2 Screening of Individual Policies notes that the policy should emphasis that 'large lengths of the coast are European sites or related to European sites, and that Habitats Regulations Assessment is likely to apply to developments affecting these lengths of coast.' We support this recommendation

Felixstowe Peninsula Area Action Plan Preferred Options Document

Para. 2.01 refers to some of the environmental designations which illustrate the importance of the Felixstowe area. Reference to the SPA, which is an international designation, would enhance this.

There appears to be some inconsistency between the AAP and Policy SSP30 Visitor Management - Deben Estuary. Paras. 6.10 and 6.11 discuss access and parking - these should be checked for consistency with the policy. Policy FPP18 Felixstowe Ferry and Golf Course also appears inconsistent with SSP30 in that it seeks to increase parking provision. Note that we have suggested amendments to Policy SSP30 (see our comments on the Site Allocations and Area Specific Policies DPD under Section 5 - Tourism).

Para. 6.10 refers to recreational pressure on the Deben Estuary SPA. It should also be noted that The Knolls (just outside the SPA) are important for breeding little terns, and are also vulnerable to recreational pressure.

Paras. 6.28 - 6.33 could make reference to the breeding birds of the Landguard Common SSSI, particularly ground nesters, as these species are particularly sensitive to recreational disturbance.

Paras. 7.05 - 7.07 discuss the update to the HAGGIS study. Please refer to our comments on the Site Allocations and Area Specific Policies DPD under Section 6 - Recreation and Green Infrastructure above.

Policy FPP25 Access to the Countryside refers to the provision of green infrastructure. We recommend that proposals for green infrastructure which maximise biodiversity benefits should also be encouraged.

We support the rejection of New Site 3028 Land at Manor Terrace as this site is very close to the Landguard Common SSSI and its sensitive plants and breeding birds.

Habitats Regulations Assessment for Felixstowe Peninsula Area Action Plan

We support the recommendation in para. 3.4.3 that Policy FPP10 Port of Felixstowe is expanded to include reference to the potential need for HRA should developments be proposed within or to expand the Port.

We trust that these comments are helpful. If you have any queries about the comments above, please do not hesitate to contact me.

Summary:

Paras. 7.05 - 7.07 discuss the update to the HAGGIS study. Please refer to our comments on the Site Allocations and Area Specific Policies DPD under Section 6 - Recreation and Green Infrastructure above.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

RSPB response to preferred options consultation 231115.pdf

C - 7713 - 2605 - 7.05 - None

7713 Comment

Environment 7.05

Respondent: Suffolk Wildlife Trust (Mr James Meyer) [2605] Agent: N/A

Full Text: RF: Suffolk (

RE: Suffolk Coastal DC Site Allocations and Area Specific Policies Local Plan

Document Preferred Options Consultation and Felixstowe Area Action Plan Preferred Options Consultation

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Site Allocations Preferred Options Document

A number of sites proposed for allocation appear to incorporate areas of semi-natural habitat, for example sites at Westerfield and Witnesham (Chapel). Such sites should not be allocated until their biodiversity value has been established. In addition, policies for all site allocations should ensure that all development delivers ecological gain in accordance with the requirements of the National Planning Policy Framework (NPPF) (section 110).

The document also includes a number of settlement boundary amendments. Whilst we support the redrawing of boundaries to tighten them around existing development, there are a number of settlements where the boundary has been extended to take in new areas for development. Of particular concern are extensions at Bawdsey and Rushmere St Andrew where ecological surveys accompanying recent planning applications have demonstrated that the areas have existing biodiversity value. This evidence should be taken in to account

through the Local Plan process and settlement boundaries should not be amended to take in areas which are of existing biodiversity value.

It is also noted that a settlement boundary is proposed around existing development to the south of Hollesley (Alderton Road/Bushy Lane) which does not currently lie within such a boundary. Designation of such a boundary area would potentially allow further development which may result in an adverse ecological impact. The plan should not allow for development which is likely to result in such impacts.

All site allocation policies should also seek ecological enhancements as part of any new development.

Felixstowe Area Action Plan (AAP) Preferred Options Document

A number of the policies in the draft AAP have negative scores for the biodiversity

Sustainability Appraisal indicator (indicator 17). It is unclear how this will be addressed and a plan should not be put forward which results in an overall negative impact on biodiversity, as such this would not be in conformity with the NPPF. For example policy FPP2 scores negatively on the environmental Sustainability Appraisal criteria and it is unclear how allocation of this site would address this. Paragraph 110 of the NPPF requires that plans should aim to minimise adverse effects on the local and natural environment and should allocate land with the least environmental value.

It is also noted that the draft AAP proposes the allocation of sites in Walton; Trimley St Mary and Trimley St Martin. A number of these sites have previously had ecological surveys carried out on them as part of planning applications which has identified that they have biodiversity value. It is unclear how the policies which are proposed to allocate these sites address this issue. It is also unclear whether the cumulative impact of developing all the proposed sites has been assessed. In accordance with the NPPF (paragraph 110) only land with the least environmental value should be allocated.

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"Suffolk Wildlife Trust have identified that the site is within a Suffolk Wildlife Trust consultation area and any future development on this site will need to ensure that issues can be resolved or mitigated through appropriate design". We do not set 'consultation areas' and are unclear where this concept has come from. We therefore request that reference to this is removed from the AAP. It should also be ensured that where sites are to be allocated, the LPA are certain that "issues can be resolved or mitigated through appropriate design". Where there is uncertainty that biodiversity impacts can be mitigated the site should not be allocated, in accordance with the requirements of the NPPF. The AAP should also seek ecological enhancements as part of any new development.

Green Infrastructure

New development brings increased demand for green space, the evidence for green infrastructure planning in the district is currently underpinned by the Haven Gateway Green Infrastructure Strategy (The Landscape Partnership, 2008) and a Green Infrastructure Strategy (The Landscape Partnership, 2011) for the area within the district outside of the Haven Gateway Area. The site allocations process should be used as a mechanism for the implementation of such strategies. As both of these documents are a number of years old we recommend that as part of the development plan process they are updated and that a single plan is produced to cover the whole district. Such a plan should also take account of green infrastructure in neighbouring districts and boroughs in order to produce a plan at a strategic scale.

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The Habitats Regulations Assessment (HRA) of the Site Allocations Preferred Options identifies further work that is required to assess the impacts of several parts of the plan on sites of European nature conservation importance. Such assessment should be undertaken prior to the council's Preferred Options being progressed in order to determine whether they are likely to result in significant adverse effects on such nature conservation sites.

The HRA report discounts potential impacts from a number of the proposed sites as they are perceived to be outside of

C - 7713 - 2605 - 7.05 - None

7713 Comment

Environment 7.05

walking distance from a European designated site. However, the study does not appear to take account of travel by car from new developments to European designated sites. Prior to the allocation of any new development sites this factor must be addressed to ensure that development of allocated sites, both alone and in-combination, is not likely to result in adverse impacts on any European designated sites. Unless this matter is

adequately addressed we do not consider that the plan can be demonstrated to be 'sound'.

The HRA of the Council's adopted Core Strategy DPD also identified a number of measures which were required in order to prevent increased recreational pressure from resulting in a likely significant effect on sites of European nature conservation importance. It should therefore be ensured that these measures are incorporated in to the Site Allocations and Felixstowe AAP documents, with the impacts of the proposals within these documents then assessed accordingly. If you require any further information or wish to discuss any of the points raised above please do not hesitate to contact us.

Summary:

New development brings increased demand for green space, the evidence for green infrastructure planning in the district is currently underpinned by the Haven Gateway Green Infrastructure Strategy (The Landscape Partnership, 2008) and a Green Infrastructure Strategy (The Landscape Partnership, 2011) for the area within the district outside of the Haven Gateway Area. The site allocations process should be used as a mechanism for the implementation of such strategies.

Change to Plan

As both of these documents are a number of years old we recommend that as part of the development plan process they are updated and that a single plan is produced to cover the whole district. Such a plan should also take account of green infrastructure in neighbouring districts and boroughs in order to produce a plan at a strategic scale.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

Suffolk Coastal Site Allocations Preferred Options.pdf

C - 6787 - 2549 - 7.06 - None

6787 Comment

Environment 7.06

Respondent: Mrs Judith Hedges [2549] Agent: N/A

Full Text: Here are my comments on:-

Felixstowe Peninsula Area Action Plan Preferred Options

Paragraph 3.39

I object to building on the land to the north of Conway Close because

- 1. Gulpher Road and the eastern leg of Ferry Road are Felixstowe's only quiet country lanes enjoyed by walkers, cyclists, horseriders and sight seeing cars for those not able to be active. To build on this site would increase the traffic flow such this would no longer be possible.
- 2. There is already severe congestion at the Ferry Rd entrance to Kingsfleet School at arrival and departure times. This would increase to an intolerable level with more housing.
- 3. Gulpher Road is too narrow to handle extra traffic from new housing on this site.
- 4 At present there is a very pleasant countryside footpath walk through The Grove, into Hyems Lane, across the field north of Conway Close, across the field by the Ferry Rd allotments to the pill box and then a short walk down the quieter section of Ferry Rd to the coast at the Golf Club. If the field north of Conway Close is developed and even if a right of way is preserved this walk will then be partly on a hard surfaced urban pathway and loose its attraction. Felixstowe has very few countryside footpath walks it is essential they are maintained. To walk along our footpaths is a superb experience. The views and countryside sights and smells are pure escapism and at present they are on our doorstep, It is our duty to keep them available for future generations.

Paragraph 7.02

I object to the last sentence of this paragraph. It should state that the high quality agriculture land and countryside north of Felixstowe IS to be protected. It should not say 'where possible'. We are custodians of our environment, town and countryside, for future generations and as such we must plan with them in mind not just for our needs for the next couple of decades. The area between the red district centre boundary and the length of Gulpher Road and the eastern leg of Ferry Road(nth of allotments) needs to be included in the area that needs to be protected from development. This may mean that the red district centre boundary needs to be moved to Gulpher Road so that the protected area is included

It is essential that high quality agricultural land is preserved to help our country be self supporting as much as possible. Preserving agricultural land is also essential for our wellbeing. We have evolved to live off the land and in touch with the land. To continue with urbanisation of our environment will prove to be disastrous for our well being and expensive for society. In Felixstowe we are far more fortunate than people in many, many other towns and cities but that does not mean we should start loosing our countryside in the way they have lost their countryside. The Green Belt is essential for all and should be sacrosanct. We seem to pay more attention to countries loosing their big mammals than us loosing our small mammals. We have already lost our big mammals and birds. We must now look to keeping linked countryside areas for our fast disappearing stoats, weasels, hedgehogs, badgers, owls, greenfinches and our meadow and woodland wildflowers and native trees. Two facts amaze me, 1. I have never seen a tree sparrow and 2. you can count on one hand how many black poplar trees survive in our locality. It will be a sad day when future generations only see an owl or a hedgehog in a nature book

Paragraph 7.06

We are indeed short of woodland.

An area needs to be marked on the plan for woodland development in the same way as areas are marked out for housing, retail etc. If left to be considered as part of housing development plans then no substantial or connected woodlands will appear. Woodlands need to be connected to offer large enough territories for wildlife to thrive. In Felixstowe we are fortunate in having The Grove and Abbey Grove on our doorstep. Both woodlands are open to the public 24/7. These woods are cared for by volunteers under SCDC and the Woodland Trust respectively to provide a mixture of wildlife habitats combined with providing beautiful areas for the public to enjoy. Both these areas are small, too small for many small mammals to thrive. If the land connecting and between these two woodlands was converted to woodland then Felixstowe would have a woodland to be proud of, for people to enjoy and for wildlife to thrive and multiply. May be this land could be purchased between the community, Woodland Trust and developers in the town. Appendix 7

The area between the red district centre boundary and the length of Gulpher Road and the eastern leg of Ferry Road(nth of allotments) needs to be included in the area that needs to be protected from development. This may mean that the red district centre boundary needs to be moved to Gulpher Road so that the protected area is included. We are custodians of our environment, town and countryside, for future generations and as such we must plan with them in mind not just for our needs for the next couple of decades. They must be allowed to enjoy the environment that we have enjoyed. It is essential that high quality agricultural land is preserved to help our country be self supporting as much as possible. Preserving agricultural land is also essential for our wellbeing. We have evolved to live off the land and in touch with the land. To continue with urbanisation of our environment will prove to be disastrous for our well being and expensive for society. In Felixstowe we are far more fortunate than people in many, many other towns and cities but that does not mean we should start loosing our countryside in the way they have lost their countryside. The Green Belt is essential for all and should be sacrosanct. We seem to pay more attention to countries loosing their big mammals than us loosing our small mammals. We have already lost our big mammals and birds. We must now look to keeping linked countryside areas for our fast disappearing stoats, weasels, hedgehogs, badgers, owls, greenfinches and our meadow and woodland wildflowers and native trees. Two facts amaze me, 1. I have never seen a tree sparrow and 2. you can count on one hand how many black poplar trees survive in our locality. It will be a sad day when future generations only see an owl or a hedgehog in a nature book.

Many thanks for all your work on this plan

C - 6787 - 2549 - 7.06 - None

6787 Comment

Environment 7.06

Summary: An area needs to be marked on the plan for woodland development in the same way as areas are marked out for

housing, retail etc. If left to be considered as part of housing development plans then no substantial or connected woodlands will appear. Woodlands need to be connected to offer large enough territories for wildlife to thrive. In Felixstowe we are fortunate in having The Grove and Abbey Grove on our doorstep. If the land connecting and between

these two woodlands was converted to woodland then Felixstowe would have a woodland to be proud of.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

O - 6904 - 3234 - 7.06 - None

6904 Object

Environment 7.06

Respondent: Mrs Julie Cornforth [3234] Agent: N/A

Full Text: I object to housing being built on Fxt green fields when the updated Haven Gateway Green Infrastructure Study has

stated that there is a "deficit in green infrastructure in north Fxt, Trimley St Mary and Martin."

Summary: I object to housing being built on Fxt green fields when the updated Haven Gateway Green Infrastructure Study has

stated that there is a "deficit in green infrastructure in north Fxt, Trimley St Mary and Martin."

Change to Plan If there is a "deficit" of green spaces in the Fxt area, you don't "address" this problem by building 1000's of houses on

the few green fields that we have left!

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6654 - 160 - Preferred Policy FPP25: Access to the countryside - None

6654 Comment

Environment Preferred Policy FPP25: Access to the countryside

Respondent: Mr Thomas O'Brien [160] Agent: N/A

Full Text: I am in support of reinstating the sea wall public footpath from Martlesham Creek to Waldringfield. I am a resident of

Martlesham Heath, which has grown in population greatly over the years, and is planned for more growth. This population deserves open spaces and countryside for their health and well being. This footpath is a spectacular walkway. I can understand the views of Waldringfield local residents, wildlife groups and wild fowlers, but its rather cynical to force through housing development in Martlesham Heath and then fence the population in so as not to

disturb' the others.

Summary: I am in support of reinstating the sea wall public footpath from Martlesham Creek to Waldringfield. I am a resident of

Martlesham Heath, which has grown in population greatly over the years, and is planned for more growth. This population deserves open spaces and countryside for their health and well being. This footpath is a spectacular walkway. I can understand the views of Waldringfield local residents, wildlife groups and wild fowlers, but its rather cynical to force through housing development in Martlesham Heath and then fence the population in so as not to

'disturb' the others.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6815 - 2839 - Preferred Policy FPP25: Access to the countryside - None

6815 Comment

Environment Preferred Policy FPP25: Access to the countryside

Respondent: RSPB (Jacqui Miller) [2839] Agent: N/A

Full Text: Re: Site Allocations and Area Specific Policies - Preferred Options Consultation

Thank you for consulting the RSPB regarding the Preferred Options Consultation. Please find our comments below.

Site Allocations and Area Specific Policies DPD - Preferred Options Consultation Document

Introduction

Paras. 106-107 and Policy SSP1 refer to the planning application at Adastral Park. It should be noted that at this stage, there cannot be confidence that the application and its associated green space provision will be realised, as the application is as yet undetermined. Therefore this project should not be relied upon to provide mitigation for recreational pressure on European sites through the provision of green space for the district as a whole.

SSP3 Land to the rear of Rose Hill, Saxmundham Road, Aldeburgh (SHLAA ref 608)

We have previously raised concerns (in our response of 26th February 2015 to the Issues and Options consultation) about this site regarding its proximity to the Alde-Ore Estuary SPA and Ramsar site, however, this was on the basis of 69-108 houses. A reduction to ten houses plus a care home may reduce concerns, but this restriction should be clearly worded (as an upper limit) into the resulting policy (SSP3). At present it is not clear whether the requirement is for less than ten units (as in the excerpt from the Sustainability Appraisal) or 'around ten' as in para. 2.23. As noted in the Habitats Regulations Assessment (HRA), the status and use of the access route to the estuary should be clarified, and the provision of alternative open space considered. It should be noted that, if an application is brought forward for this site, HRA at the project level will be required, and proposals for mitigation should be included in plans for any development.

We support the rejection of alternative option site 982. We note that Appendix 3 indicates that this site was rejected due to potential effects on the Alde-Ore Estuary SPA (in line with our comments). This should be recognised here.

SSP10 Land west of Garden Square Rendlesham

We support the requirement to provide open space for daily dog walking as an alternative to the more sensitive Tunstall and Rendlesham Forests (part of the Sandlings SPA).

SSP22 Bentwaters Park, Rendlesham

We note that the policy refers to the sensitivities of this site within the AONB. This policy should also recognise that Bentwaters Parks adjoins the Sandlings SPA and is in close proximity to the Alde-Ore Estuary SPA, SAC and Ramsar site. It will be necessary to consider potential effects on these designated wildlife sites when making decisions as to future activities on this site.

Section 5 - Tourism

References to Natura 2000 sites in para. 5.02 should include the Sandlings, as well as the estuaries.

Policy SSP30 proposes a restriction on public car parking within 1km of the Deben Estuary as mitigation against increases in recreational pressure resulting from the in-combination effects of housing proposals in the area. Whilst we support some restrictions on new parking provision, we suggest this should focus on provision relating to activities likely to cause most disturbance and/or locations that are most sensitive to disturbance. Seasonal restrictions could also be considered, based on the presence of sensitive species. We are also concerned that purely restricting access does not encourage responsible behaviour and enjoyment of and respect for the natural environment. We therefore recommend that consideration is given to a range of mitigation measures which could be funded through a formalised developer contributions scheme. The Council should consider those measures proposed in the Deben Estuary Plan, with examples including:

□ seasonally adapted routes including diversions if necessary
□ screening of routes
provision of information to visitors - signage, interpretation, community events to educate people about the
importance of the area and responsible visiting
□ gates preventing dogs running ahead
□ bunds and hides etc to screen birds from visitors in sensitive areas
□ managing visitor numbers during busy periods through charging and parking restrictions
□ quidance for dog walkers and river users (e.g. through codes of conduct)
□ a wardening scheme
an ongoing visitor management plan - including provision for monitoring of impacts and review of mitigation

As noted in para. 5.05 of the Site Allocations and Area Specific Policies DPD, this approach should be complemented with provision of areas of attractive alternative green space, including areas suitable for dog walking, within individual

C - 6815 - 2839 - Preferred Policy FPP25: Access to the countryside - None

6815 Comment

Environment

Preferred Policy FPP25: Access to the countryside

development sites.

SSP31 Snape Maltings

While para. 5.06 refers to the conservation importance of the area within which Snape Maltings is set, the policy itself does not. We recommend that the sentence requiring that all proposals should seek to protect and enhance the special character and interest of the heritage assets should be amended to include the natural environment as well.

Section 6 Recreation and Green Infrastructure

We are pleased that the Haven Gateway Green Infrastructure Strategy (HAGGIS) has recently been updated, however, this update does not appear to be available for review. In our previous comments of 26th February 2015 on the Issues and Options consultation, we recommended that the 2011 Green Infrastructure Strategy for the Suffolk Coastal district is also updated. We commented that:

"At present the district Green Infrastructure Strategy appears focused on recreational provision. Whilst important, we consider that there is also an opportunity to expand the Strategy to include biodiversity targets. This should aim to create networks of sites of biodiversity value that 'fill the gaps' between existing green space features and sites of importance for biodiversity. Joined up networks are more functional and allow species to move between sites, helping them to adapt to the likely effects of climate change. We recommend that the currently available maps of priority habitat types are supplemented by map(s) showing designated sites (including international sites, SSSIs and County Wildlife Sites). These maps of current biodiversity resource can then be used to identify those areas which could be targeted for restoration, buffering or linkage through habitat creation or restoration."

RSPB response to Suffolk Coastal District Council Site Allocations and Area Specific Policies Issues and Options Consultation, 26th February 2015

These comments are still relevant. We also recommend that the outputs from the HAGGIS update and an update to the Suffolk Coastal Green Infrastructure Strategy should be consolidated into an SPD setting out a district-wide strategy, alongside standards for green infrastructure provision within developments. The production of an SPD would clarify and formalise requirements and ensure that there is one easily accessible set of targets and standards for the district.

Section 7 - Environment

Para. 7.03 discusses potential mitigation required as a result of increased recreational pressure. It should be clarified that this mitigation is with regard to impacts on designated European conservation sites (SPAs, SACs and Ramsar sites).

New site 3007 Saxmundham sub area (Land to south east of Blythburgh Road)

We agree with the rejection of this site due to the acknowledged potential for impact on the Minsmere-Walberswick SPA, SAC and SSSI.

New site 3024 Saxmundham sub area (Land off Aldringham Road)

We agree with the rejection of this site due to the acknowledged potential impact on the Sandlings SPA and SSSI.

Habitats Regulations Assessment for Site Allocations and Area Specific Policies DPD

Para 2.3.2 states that the assessment of the Suffolk Coastal Core Strategy found no adverse effect on the integrity of any European site. This should be clarified to state that this is dependent on the provision of mitigation to address recreational pressure as a result of housing numbers. Without such mitigation, adverse effects on integrity would result.

Para. 3.3.3 refers to a Green Infrastructure Plan under consideration by Suffolk Coastal District and Ipswich Borough. As stated in our comments above, we consider that this work should be formalised within an SPD.

Para. 3.3.3 also refers to a country park proposed as part of the Adastral Park development. As stated above, there cannot be confidence that the application and its associated green space provision will be realised, as the application is as yet undetermined.

We agree with the assessment in para. 3.4.2 that policies SSP3 Land to the rear of Rose Hill, Saxmundham Road, Aldeburgh and SSP31 Snape Maltings could have a Likely Significant Effect on European sites.

We support the conclusion in para. 3.4.15 that a visitor disturbance study is required for the Alde-Ore Estuary in order to understand possible impacts from Policy SSP31 Snape Maltings. As noted in para. 3.5.1, both the policies resulting in Likely Significant Effect relate to the Alde-Ore Estuary, hence a disturbance study could also aid assessment of SSP3 Land to rear of Rose Hill, Saxmundham Road, Aldeburgh and any future developments close to the estuary.

Para. 3.4.16 refers to the proposed restriction in new car parking around the Deben Estuary and opportunities to apply this policy to other European Sites. We recommend the approach suggested above (see comments on Section 5 -

C - 6815 - 2839 - Preferred Policy FPP25: Access to the countryside - None

6815 Comment

Environment

Preferred Policy FPP25: Access to the countryside

Tourism) for the Deben Estuary, and that consideration should be given to a similar scheme for other European sites (potentially including the Alde-Ore Estuary, dependant on the results of the proposed disturbance study).

We support the statement in para. 3.6.3 that the proposed development of Adastral Park will require its own project level HRA

The discussion of SSP38 Coastal Change Management Area in Appendix 2 Screening of Individual Policies notes that the policy should emphasis that 'large lengths of the coast are European sites or related to European sites, and that Habitats Regulations Assessment is likely to apply to developments affecting these lengths of coast.' We support this recommendation

Felixstowe Peninsula Area Action Plan Preferred Options Document

Para. 2.01 refers to some of the environmental designations which illustrate the importance of the Felixstowe area. Reference to the SPA, which is an international designation, would enhance this.

There appears to be some inconsistency between the AAP and Policy SSP30 Visitor Management - Deben Estuary. Paras. 6.10 and 6.11 discuss access and parking - these should be checked for consistency with the policy. Policy FPP18 Felixstowe Ferry and Golf Course also appears inconsistent with SSP30 in that it seeks to increase parking provision. Note that we have suggested amendments to Policy SSP30 (see our comments on the Site Allocations and Area Specific Policies DPD under Section 5 - Tourism).

Para. 6.10 refers to recreational pressure on the Deben Estuary SPA. It should also be noted that The Knolls (just outside the SPA) are important for breeding little terns, and are also vulnerable to recreational pressure.

Paras. 6.28 - 6.33 could make reference to the breeding birds of the Landguard Common SSSI, particularly ground nesters, as these species are particularly sensitive to recreational disturbance.

Paras. 7.05 - 7.07 discuss the update to the HAGGIS study. Please refer to our comments on the Site Allocations and Area Specific Policies DPD under Section 6 - Recreation and Green Infrastructure above.

Policy FPP25 Access to the Countryside refers to the provision of green infrastructure. We recommend that proposals for green infrastructure which maximise biodiversity benefits should also be encouraged.

We support the rejection of New Site 3028 Land at Manor Terrace as this site is very close to the Landguard Common SSSI and its sensitive plants and breeding birds.

Habitats Regulations Assessment for Felixstowe Peninsula Area Action Plan

We support the recommendation in para. 3.4.3 that Policy FPP10 Port of Felixstowe is expanded to include reference to the potential need for HRA should developments be proposed within or to expand the Port.

We trust that these comments are helpful. If you have any queries about the comments above, please do not hesitate to contact me.

Summary:

Policy FPP25 Access to the Countryside refers to the provision of green infrastructure. We recommend that proposals for green infrastructure which maximise biodiversity benefits should also be encouraged.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

RSPB response to preferred options consultation 231115.pdf

C - 7062 - 2722 - Preferred Policy FPP25: Access to the countryside - None

7062 Comment

Environment Preferred Policy FPP25: Access to the countryside

Respondent: Levington & Stratton Hall Parish Council (Mrs Agent: N/A

Marian Rose) [2722]

Full Text: Preferred Options public consultation; the Site Allocations and Area Specific Policies; & Felixstowe Peninsula Area

Action Plan

The Parish Council has previously participated over the past 12 years in every stage of the advancement of the two planning documents recently issued for public consultation by Suffolk Coastal District Council. It is therefore aware of much of the content carried forward from these previous consultations documents.

Following the Parish Council meeting on 4 November, when the latest planning documents were discussed, the following comments were made for your consideration:

- Site Allocations and Area Specifics Policies Development Plan Document Preferred Options Consultation Document -October 2015
- i. It is noted that Page 58 Strategic Employment Site refers to the future development of Ransomes, Nacton Heath. This would require the reversion of AONB land to developable land. Whilst we can see the sense of this, as small areas of AONB are separated from the main area by an A road, it does extend the build environment of Ipswich eastwards, although it is bounded, at present, by the A12/A14 road.
- ii. Page 96 -Tourism -refers to the Suffolk Showground. More specifically, it confirms the site as an events venue, but allows for an "enabling development" of up to 300 new homes. It is further stated that further housing will be agreed within the site.

These will be residential developments and extend the build environment of Ipswich eastwards although, again, at present, bounded by the A12/A14 road.

- iii. Page 98 onwards refers to Recreation and Green Infrastructure [Core Strategy Objective 14]. It particularly refers to the importance of access to green space and green corridors for wildlife.
- iv. Page 108 Built Environment Areas to be Protected from Development. This reinforces the status and protection afforded by the Hierarchy of Settlements, including Levington and Stratton Hall, which cannot sustain development. If developments should ever be favoured, whether residential or employment, they would seriously jeopardise this carefully balanced hierarchy of communities.
- v. We therefore see any developments eastwards from Ipswich, beyond the A12/A14 road, as a risk to the valued green space between Ipswich and Felixstowe.
- vi. We welcome the comments on Page 71 Levington Park SSP 14.
- vii. Page 104 -Natural Environment AONB refers to Special Landscape Areas, including many river valleys, including Historic Parkland [see also page 103]. We cannot see reference to the River Orwell in this section. If our observation is correct, shouldn't this River be included in this section?
- viii. We note the need for mitigation under page 101 Environment -need for visitor management.
- 2. Felixstowe Peninsula Area Action Plan [AAPJ Preferred Options Consultation Document October 2015
- i. There are many references to the natural environment and Sections 1.28,
- 1.29. and 1.31. stress the importance of protection.

Page 76 -Environment - Access to the Countryside - also makes strong reference to environmental protection.

There is much reference to mitigation, without any information on what the mitigation will be. It is essential that details are provided , and their effectiveness assessed, before developments take place.

- ii. We welcome the sites in and around Marston Hall being discounted from development.
- iii. We note the residential developments to the western side of the AAP in Trimley St Martin and Kirton.
- 3. Summary

The Parish Council welcomes the opportunity to once again comment at this stage of the planning process and, drawn from the commentary, makes the following remarks:

i. We firmly maintain the importance of retaining a clear separation between eastern boundary of Ipswich and the western edge of the Felixstowe AAP. We sincerely hope that the proposed developments to the east of Ipswich [see 1i.

C - 7062 - 2722 - Preferred Policy FPP25: Access to the countryside - None

7062 Comment

Environment

Preferred Policy FPP25: Access to the countryside

and 1ii. above] and to the west of the Felixstowe AAP [see 2iii. above] do not compromise this valued area of Suffolk countryside, having a treasured mixture of agriculture and naturalness.

ii. We are aware that the planning documents represent the development intentions of the current planning period, for both residential and employment purposes.

However, we are aware that a strategic review will take place shortly and possibly is now taking place. Being mindful of what we have said in 3i. above, we trust that SCDC will protect this area from all development, including industrial. We note that the relevant area north of the A I 4 is in the Site Allocations and Area Specifics Policies Development Plan Document area, while that to the south falls in the Felixstowe AAP area. There is the usual danger of separate bodies looking only at their own area and not co-ordinating their plans. It is vital that an overall view is taken. The area south of the A14 is noteworthy as it is the hinterland to the AONB. It is worth making the point that it is not just what is in an AONB which matters but also the outside factors which may impact badly upon it.

iii. We would welcome details of the mitigation required by the environmental assessments to protect the wildlife, natural environment, communities, and fragile road infrastructure in the AONB and its hinterland [see I.viii and 2.i above].

iv. In respect of I .vii above, we would like to know why the River Orwell is not included in this section.

Summary:

i. There are many references to the natural environment and Sections 1.28, 1.29. and 1.31. stress the importance of protection.

Page 76 -Environment - Access to the Countryside - also makes strong reference to environmental protection. There is much reference to mitigation, without any information on what the mitigation will be. It is essential that details are provided , and their effectiveness assessed, before developments take place.

We would welcome details of the mitigation required by the environmental assessments to protect the wildlife, natural environment, communities, and fragile road infrastructure in the AONB and its hinterland.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

S - 7350 - 2516 - Preferred Policy FPP25: Access to the countryside - None

7350 Support

Environment Preferred Policy FPP25: Access to the countryside

Respondent: Natural England (Sir/ Madam) [2516] Agent: N/A

Full Text: Planning consultation: Preferred Options Public Consultation

Site Allocations and Area Specific Policies; Felixstowe Peninsula Area Action Plan

Thank you for your consultation on the above which was received by Natural England on 19 October 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.

WILDLIFE AND COUNTRYSIDE ACT 1981 (AS AMENDED)
CONSERVATION OF HABITATS & SPECIES REGULATIONS 2010 (AS AMENDED)

Site Allocations and Area Specific Policies Development Plan Document

Preferred Options Consultation Document (October 2015)

Preferred Option Policy SSP1: New Housing Delivery 2015 - 2027

We note the requirement for new housing delivery to meet, as a minimum, the Core Strategy requirement for 7,900 homes over the period 2010 - 2027.

Preferred Option SSP3 - Land rear of Rose Hill, Saxmundham Road Aldeburgh

The policy allocates 3ha of land at this location for the provision of a care home plus ten residential units. The site is about 300m from Alde-Ore Estuary Special Protection Area (SPA)/Ramsar site and Alde-Ore and Butley Estuaries Special Area of Conservation (SAC). The avoidance of strategic housing proposals at Martlesham and at Felixstowe Peninsula within 1km of the Deben Estuary and

Orwell Estuary respectively has been proposed as mitigation in part for adverse effects arising from increased recreational disturbance. Preferred Option SSP3 is within 1km of the Alde-Ore Estuary and therefore we advise that it would be required to have a Habitats Regulations Assessment at the application stage.

The Preferred Option is within Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). We note the requirements for design to take account of the sensitive landscape context of the development and advise that a Landscape and Visual Assessment (LVIA) would be required at the application stage. In summary, further detailed information will be required to assess the environmental impact of the proposed policy at this location.

Preferred Option SSP18 Ransomes, Nacton Heath (around 30 hectares)

The potential development within the AONB has significant landscape and visual impacts. We note that potential mitigation is stated to include de-designation of AONB land, rationalising existing AONB boundary and/or high quality design of buildings, structures and setting to reduce landscape impacts and impacts on potential historic interests. We advise that the policy should not rely on the

boundary of the AONB being amended. For clarity, it is Natural England's statutory responsibility to determine the designation of AONBs or to review existing AONB boundaries. For further information, please see following a link to our Designations Strategy:

http://publications.naturalengland.org.uk/publication/2647412.

However, we support the proposal for a development brief to be prepared by the District Council toprovide detailed planning guidance for the whole area, covering both the former employment allocation and the AONB element to allow for a more flexible approach to be progressed.

Preferred Option SSP30 Visitor Management - Deben Estuary

We agree with the policy to prevent increased recreational disturbance of Deben Estuary by preventing any additional car parking provision within a 1km distance of the estuary and by requiring proposed improvements to existing access points which would result in an increased level of recreational activity on the estuary to demonstrate that they will not result in any "significant effect" either on their own or in combination with other uses.

Preferred Option SSP31 Snape Maltings (replaces policy AP166)

The policy promotes the use of Snape Maltings for arts, recreation, and tourism-related uses. Snape Maltings is within Suffolk Coast and Heaths AONB and is adjacent to Alde-Ore Estuary SPA/Ramsar site and Alde-Ore and Butley Estuaries SAC. Proposals at this location will be required to demonstrate that they will not have an adverse impact on the protected landscape and designated sites and may require a Habitats Regulations Assessment and/or LVIA at application stage.

Habitats Regulations Assessment

We agree with the screening exercise carried out by the HRA that Preferred Options SSP3 (Land rear of Rose Hill, Saxmundham Road Aldeburgh) and SSP31 (Snape Maltings) are likely to have a significant effect on internationally designated sites. We note that the HRA advises that a study of existing visitor disturbance to birds, looking at the amount and origin of visitor activity as well as the birds' response is required for the vicinity of Snape Maltings; we agree

S - 7350 - 2516 - Preferred Policy FPP25: Access to the countryside - None

7350 Support

Environment

Preferred Policy FPP25: Access to the countryside

with the requirement for further evidence to inform a detailed assessment of this option.

We agree with the conclusion of the HRA (see section 5.1.1) which states that 'Site Allocation Document as a standalone document is likely to have a significant effect upon Alde-Ore Estuary European sites, with Preferred Policies SSP3 (land to the rear of Rose Hill, Saxmundham Road, Aldeburgh) and SSP31 (Snape Maltings) likely to have a significant effect by causing an increase in

disturbance to SPA-qualifying birds using the estuary'. However, we are unable to conclude no adverse effect on integrity of European sites from the subsequent statement that 'For both policies, further information and / or study might be able to inform a subsequent conclusion of no adverse effect upon the integrity of the European site' as this is not definite. We advise that either a rewording of the policies and/or further detailed assessment, including potential mitigation

measures, is required to enable us to have confidence in a conclusion of no adverse effect on integrity of European sites from these Preferred Options. We would be happy to give you further advice in this respect.

We support Preferred Option SSP30 (Visitor Management - Deben Estuary) regarding proposed improvements to access points such as slipways or jetties which may result in an increased level of recreational activity on the estuary needing to demonstrate that the proposal would not result in a likely significant effect on the notified features of the international site.

We note that the HRA states that mitigation for 'in combination' effects of new housing proposed in the Suffolk Coastal Core Strategy is being taken forward (section 3.3.3). In particular, we note that a Green Infrastructure plan is being considered by Suffolk Coastal District and Ipswich Borough to address the visitor management measures. In line with our current advice, we advise that this is not

sufficient to give confidence that the required mitigation measures will be delivered. There needs to be a commitment to having a mitigation strategy in place, informed by the green infrastructure plan, ideally by the time the plan is adopted or by a specified timescale shortly after the plan is adopted.

We advise this is necessary to give certainty that the mitigation measures will be delivered to ensure the plan is compliant with the Habitats Regulations and with paragraphs 113 and 118 of the NPPF.

We therefore suggest the following rewording:

'The Council will produce a mitigation strategy by {INSERT DATE} which will specify the measures required and how these will be delivered and funded'

Felixstowe Peninsula Area Action Plan

Preferred Options Consultation Document (October 2015)

Preferred Policy FPP1: Housing

We note that the Felixstowe Peninsula AAP identifies the requirement for 1,100 new dwellings on the preferred sites outlined in the document.

Preferred Policy FPP10: Port of Felixstowe

The policy promotes and safeguards land for employment, activities and operations which support the retention, expansion and consolidation of the Port of Felixstowe and the jobs associated with the Port. The expansion of the Port may have an impact on internationally designated sites. Please see our comments in Habitats Regulations Assessment below.

Preferred Policy FPP18: Felixstowe Ferry and Golf Course

We note that public access along the sea wall is to be retained within this area to ensure that sustainable links and connections are provided to maintain the unique character of the community and reduce the dominance of the motor car in this area. Please see our comments on England Coast Path below.

Preferred Policy FPP22: Martello Park to Landguard

We support the requirement for any future redevelopment of the port in this area to be carefully considered with the Landguard Partnership to ensure that the favourable condition of Landguard Common Site of Special Scientific Interest (SSSI) is maintained.

Preferred Policy FPP25: Access to the countryside

We support the policy which states that proposals which provide for the provision of green infrastructure in the Felixstowe Peninsula will be encouraged where these are well related to existing communities, offer good accessibility, connected to existing provision and provide alternative and accessible natural green space opportunities. We agree that proposals for new residential development in the Felixstowe Peninsula will be required to make provision of accessible natural green spaces as agreed by the District Council in conjunction with Natural England.

Habitats Regulations Assessment

We agree with the screening of the HRA which identified that Preferred Policy FPP10: (Port of Felixstowe) may have a likely significant effect on Stour and Orwell Estuaries SPA/Ramsar site as it stands. We agree with the conclusions of the HRA (see section 5.1.3) that the policy needs rewording to include a requirement for a Habitats Regulation Assessment to be provided in connection with proposals for expansion of Port of Felixstowe. We would be happy to give you

S - 7350 - 2516 - Preferred Policy FPP25: Access to the countryside - None

7350 Support

Environment

Preferred Policy FPP25: Access to the countryside

further advice in this respect.

We note that the HRA states that mitigation for 'in combination' effects of new housing proposed in the Suffolk Coastal Core Strategy is being taken forward (section 3.3.3). Please see our comments for the Site Allocations and Area Specific Policies Development Plan Document HRA above.

England Coast Path

We would appreciate the opportunity to discuss the requirements of the England Coast Path (ECP) with you in order to ensure that the requirements of the Coast Path and any mitigation measures arising from it, are clearly distinguished from any mitigation that might be required from the Council's proposed allocations. For more information on ECP, please see our website as follows:

. https://www.gov.uk/government/collections/england-coast-path-improving-public-access-to-thecoast.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

Summary:

We support the policy which states that proposals which provide for the provision of green infrastructure in the Felixstowe Peninsula will be encouraged where these are well related to existing communities, offer good accessibility, connected to existing provision and provide alternative and accessible natural green space opportunities. We agree that proposals for new residential development in the Felixstowe Peninsula will be required to make provision of accessible natural green spaces as agreed by the District Council in conjunction with Natural England.

Change to Plan N/A

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedN/A

Attachments:

168976_168977 Preferred Options Consultation Felixstowe Peninsula AAP $_$ Site Specific Allocations_Redacted.pdf

O - 6907 - 3234 - Sustainability Appraisal Information - None

6907 Object

Environment Sustainability Appraisal Information

Respondent: Mrs Julie Cornforth [3234] Agent: N/A

Full Text: You state that "the provision of natural green space not only creates opportunities to secure environmental

improvements but may also have major positive social effects due to increased physical activity and improved mental

health outcomes."

Summary: You state that "the provision of natural green space not only creates opportunities to secure environmental

improvements but may also have major positive social effects due to increased physical activity and improved mental

health outcomes.'

thus records ANG deprivation at the District and Regional Levels." Therefore surely you should protect Fxt's last

remaining countryside and abundant wildlife at all cost.

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7614 - 2581 - 7.08 - None

7614 Comment

Environment 7.08

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text: Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

Archaeology

Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

Archaeological remains are not included in the section on non-designated heritage assets. At present, the document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation (which would be proportionate to the significance of the asset - desk based and/or trenching) and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

- * FPP4 Walton Field evaluation has identified an Early-Middle Bronze Age funerary landscape across the site, with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.
- * FPP6 Trimley Cropmarks on this site show that there are complex archaeological remains of pits, ditches and a coaxial field system and trackways of possible late prehistoric date (TYN 122). Archaeological remains are therefore known on the site, although they have not been fully characterised.

Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7614 - 2581 - 7.08 - None

7614 Comment

Environment 7.08

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

Early Education

The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The Government has indicated that it will legislate to double the number of hours' free childcare to 30. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

- In the Trimleys, developer contributions have already been secured to help manage the existing deficit in Early Years places and proposals are being drawn up to deliver additional places. Further development of the scale proposed (530 dwellings) will necessitate significant additional provision. Under current statutory arrangements, this would necessitate 53 additional places. When Land North of Walton High Street (400 dwellings) is included, the number of places required under current arrangements would increase to 93.

The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

- Development in the remainder of Felixstowe (150 dwellings North of Conway Close and 40 dwellings at Sea Road) can be managed by expanding existing settings.
- At present, development of 15 dwellings in Kirton could be accommodated in existing provision.

In summary, whilst there is uncertainty around the level of provision which will be required, it is clear that at least one new Early Years setting will be required, with the location of this setting, and potentially one other, dependent on future primary school provision.

The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

Policy FPP15 states that 'The Secondary Shopping frontage as defined on the Policies Map will provide a mixture of uses which complement the rest of the town centre uses. Proposals which deliver a diverse range of uses will be supported where an appropriate balance is maintained.'

The County Council would appreciate consideration of ways in which this policy could be more supportive of early education in retail centres, as part of a balanced policy which also protects the vitality and viability of retail centres. Policy FPP17 appears to implicitly support early education already, and discussion with the District Council may conclude that this policy is sufficient.

Primary Education

The distribution of housing proposed creates a challenge in terms of providing sufficient additional primary school places. Land needs to be identified for a new primary school in order to ensure that there can be confidence of a long term solution for primary school provision.

1,135 dwellings are expected to generate a need for a minimum of 284 additional primary-aged pupils. Based on current forecasts at Felixstowe schools it appears that some of these pupils can be accepted into existing schools without a need for expansion. However, the distribution of housing proposed places pressure on Trimley St Mary and Kingsfleet Primary Schools which cannot be expanded to accept this growth.

The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7614 - 2581 - 7.08 - None

7614 Comment

Environment 7.08

[see table in attached document]

Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

Grange Primary School can also expand, though this school is also not well related to the proposed allocations or future directions of growth.

Paragraphs 37 and 38 of the National Planning Policy Framework reflect the need to minimise the length of journeys to school and, for major developments, primary schools should be located within walking distance of most properties.

The best long term solution would be to reserve 2.2ha land for a new 315-place primary school and early years setting in a location which is well related to housing growth. This would also enable provision to be made for future growth, with another school capable of expansion.

Options for reserving land for a new primary school include:

- Land within 'Land North of Walton High Street'
- Land within another one of the Trimley sites
- Land in another location in the Trimleys, well related to sustainable travel routes and the new housing.

Secondary and Sixth Form Education

Based on standard pupil multipliers, development of 1,135 dwellings would be expected to generate an additional 204 secondary school pupils and an additional 45 sixth formers.

Felixstowe and the Trimleys are served by Felixstowe Academy. Based on the forecast below, Felixstowe Academy has sufficient capacity to absorb the additional pupils arising from the development proposed in this Plan.

[see table in attached document]

All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

Health, Wellbeing and Social Care

A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

C - 7614 - 2581 - 7.08 - None

7614 Comment

Environment 7.08

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

- * Ferry Road opposite site 502E
- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-

C - 7614 - 2581 - 7.08 - None

7614 Comment

Environment 7.08

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

Archaeological remains are not included in the section on non-designated heritage assets. The document only refers to non-designated buildings and landscape features. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Not only will this help developers and landowners understand the likely evaluation and excavation costs to be placed on their sites, it will also help ensure that assessments are carried out an early stage. Furthermore, archaeological heritage is a tourism asset for Suffolk, and the development process can help promote understanding of our heritage.

Change to Plan

As such, it is suggested that the following is inserted into the section on the historic environment:

The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage assets, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets.

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Felixstowe Sites SW.pdf
Kirton Sites SW.pdf
2015-11-23 Felixstowe AAP_SCC Final Response.pdf
Kirton Sites FZ.pdf
Felixstowe Sites FZ.pdf

C - 7663 - 2581 - 7.08 - None

7663 Comment

Environment 7.08

Respondent: Suffolk County Council (Mr Robert Feakes) [2581] Agent: N/A

Full Text: Felixstowe Area Action Plan - Preferred Options Consultation

Thank you for consulting Suffolk County Council on preferred options for development in Felixstowe.

The following response relates to the ways in which the development of these sites relates to County Council responsibilities, and how our authorities will need to work together to bring these sites forward in a successful way.

This letter does not take into account the impact of sites which may come forward as windfall development, which may have significant impacts on local infrastructure.

Comments are set out below, under service headings.

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Comment - Supporting Text

The Historic Environment is referred to in paragraphs 7.08-7.24 (page 78 onwards).

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Comment - Site allocations

Comments/information on sites are included in the attached Excel spreadsheet. For the majority, evaluation at an appropriate stage will allow for localised preservation in situ and design of archaeological strategies (all in line with the National Planning Policy Framework). It is difficult to comment fully on deliverability without evaluation of sites and there are always underlying risks in allocation/production of development briefs without evaluation. Although the significance of other sites and the potential for encountering assets that may require preservation in situ is not lessened, ones highlighted in yellow have particular considerations at this stage. These are:

- * FPP4 Walton Field evaluation has identified an Early-Middle Bronze Age funerary landscape across the site, with at least one barrow that although ploughed still has evidence for a mound within the subsoil, and secondary cremations. There is also evidence for settlement and an agricultural landscape continuing into the Iron Age, and medieval archaeological remains in the south west corner. Neolithic features were also identified. This site will require extensive archaeological excavation.
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Suggested Amendments

The County Council would encourage references to archaeology in all the site summaries, particularly as it alerts developers to the need for any considerations in design, cost and timescale. Information on the levels of evaluation and appropriate stages at which to undertake them can be provided by request.

Education

C - 7663 - 2581 - 7.08 - None

7663 Comment

Environment 7.08

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision so as to minimise the need for travel.

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The current statutory framework requires that the County Council funds the provision of 15 hours per week free childcare for every 3 and 4 year old, and eligible 2 year olds. The Government has indicated that it will legislate to double the number of hours' free childcare to 30. The criteria for accessing the additional free hours is currently being refined, so is not yet clear what effect this will have on the availability of places, but it is expected to significantly increase demand even without new housing being built.

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The most logical solution would be to establish at least one additional setting, for this growth, or in combination with some of the new demand arising from Felixstowe. If a new primary school is to be established in this part of the AAP area, co-location with the school would be preferable. Whilst dependent on the outcomes of the changes in legislation concerning Early Years, the need for additional places may also require a second new setting within one of the larger housing sites.

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The changes to the law around early education provision are expected to generate a need for significant additional provision. The best location for new early education settings is alongside primary schools. When this isn't possible, the County Council's next preference is for settings to be well related to retail and community facilities. This is considered to be complementary to retail uses, given the footfall which early education settings generate.

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The following table sets out the number of pupils expected to emanate from individual sites and the primary school catchments in which the sites are located.

[see table in attached document]

Across the town as a whole, considering the total capacity of the Felixstowe and Trimleys Primary Schools, the following table shows an overall deficit when all the new dwellings are considered against the latest forecasts. It is best practice to maintain 5% spare capacity (i.e. to see 95% of maximum capacity as the 'ceiling') to manage fluctuations in year groups and to help enable parental choice. The effect of maintaining that buffer is shown below:

C - 7663 - 2581 - 7.08 - None

7663 Comment

Environment 7.08

[see table in attached document]

Of primary schools in the Area Action Plan area, Trimley St Martin Primary School can expand, given that it is not landlocked and can (theoretically) secure adjacent land. However, it is not well related to the growth in housing and expansion of this school would not offer much encouragement to sustainable travel.

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- Land in another location in the Trimleys, well related to sustainable travel routes and the new housing.

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All school capacities will be monitored against development coming forward, and contributions towards the expansion of schools will be sought as appropriate.

Health, Wellbeing and Social Care

A site allocations document such as this can only make a limited contribution toward meeting health objectives; other policies in the Core Strategy relate to urban design features, open space and leisure provision which support better health. The Building Regulations set requirements on the design of new dwellings, in relation to health objectives. However, our authorities can work together to ensure that these sites are well connected to key facilities and the countryside by walking and cycling routes. The District Council will also be considering the open space and leisure needs of the area arising from this Plan.

The AAP makes a very welcome reference to housing which meets the needs of an ageing population. The County Council is working with all of Suffolk's District and Borough Councils to estimate localised needs for housing, to meet the policy requirements set for the sites in this document.

Library Provision

Libraries help create the sustainable, healthy communities referred to in chapter 8 of the National Planning Policy Framework.

Prior to the introduction of the Community Infrastructure Levy in Suffolk Coastal, the County Council would have approximated the additional demand for library service provision based on a national benchmark of 30 square metres of library floorspace per thousand people, and an assumption of 2.4 people in each of the 1,135 dwellings proposed for allocation in this plan.

Under the new Community Infrastructure Levy regime, the County Council will work with Suffolk Libraries to identify what provision will need to be made to serve this population growth and develop bespoke projects, library by library.

A programme for expanding the service provision in Felixstowe will be developed for discussion in relation to funding through Community Infrastructure Levy funds. In some rare cases, provision may be sought on-site within very large developments, to be delivered through planning obligations.

Minerals and Waste Plans

The County Council as Minerals and Waste Authority has no objection to the proposed allocations in respect of the

C - 7663 - 2581 - 7.08 - None

7663 Comment

Environment 7.08

minerals and waste plans on grounds of conflict with permitted and allocated mineral and waste sites.

[see table in attached document]

As part of the transport assessments of these proposed sites the County Council is working with Suffolk Coastal District Council to utilise existing Transport Assessments and Traffic Data to model the existing traffic flows in the Area Action Plan locations. The data required will be obtained from traffic analysis carried on any significant sites already considered in the planning process. This data will be checked and validated against data available from Strategic Traffic Counters and other traffic data. The junctions currently proposed for assessment marked in blue on the plan below, though this list may be refined

The sites on the strategic sites list have been marked on the plan as purple areas. The main committed development sites have also been marked on the plan in a purple hatch. These sites are as follows:

- * Ferry Road opposite site 502E
- * Mushroom Farm access off Howlett Way roundabout
- * Site south of High Road, adjacent to Felixstowe Academy

[see map in attached document]

In addition to the sites identified in the draft Area Action Plan, we are also aware of an additional site, north of Candlet Road and to the east of Gulpher Road. The current proposal is subject to an objection by the County Council on highway grounds. However it is prudent to include it within the study area, and it has been marked in red, above. [see attached document]

Potential Mitigation Schemes

As part of, and in addition to, this consideration of the cumulative impacts of development, the following measures are potential mitigation measures for dealing with the impacts of these sites. They are listed below with the potential sites that are most likely to impact on them. This list also includes potential schemes that have been highlighted following an audit of cycle facilities in the area. The sites have been colour coded to match to the previous table for clarity.

[see table in attached document]

Candlet Road to High Road Link

One of the mitigation schemes listed above is a possible additional link between Candlet Road and High Road. This has been proposed in various forms by previous and current development at this site and is generally supported by both authorities as it will form a useful link from Walton and the Trimleys to the A14 for traffic wishing to access the wider strategic network and specifically the Felixstowe Dock employment sites. However it is difficult to ascertain at this stage how much traffic it will attract from the wider area and what the impact will be on the wider transport network, specifically on the current junctions and links such as the Garrison Lane traffic signals and Howlett Way roundabout. This will need to be determined through the traffic modelling process to ensure that any negative impacts on the existing network are mitigated, and the road is designed to the correct standards.

Surface Water Management

The County Council is the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea, for which the Environment Agency has lead responsibility. The District Council commissioned a strategic flood risk assessment in support of its adopted Core Strategy, which underpins the Plan's overarching approach to flood risk. The County Council's comments at this stage relate to the specific surface water issues which development will need to consider as it comes forward. Maps will be provided under a separate cover, which show the Environment Agency flood map for surface water and locations where the County Council has records of surface water flooding.

It does not appear that existing flood risk will render any of the sites are undeliverable, but some sites include records of surface water flooding which may affect site layouts and developable areas. Developers will need to:

- Have early discussions with County Council Floods and Water team before housing layouts are drafted to agree on type of SuDS and maintenance/adoption option.
- Ensure planning applications comply with validation list requirements, with SuDS measures to be shown on all relevant plans submitted as part of planning applications, in order to demonstrate how SuDS integrate with planned public open spaces, landscaping, roads, trees and buildings.
- Provide application plans which identify multifunctional SUDs e.g. those which enhance biodiversity or improve water quality. Details need to include soakage test results and calculations

The County Council has produced guidance on managing surface water issues through the development process, and the County Council's role in the development process. It is available here:

http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/General-Information/SCC-

C - 7663 - 2581 - 7.08 - None

7663 Comment

Environment 7.08

Floods-Planning-protocol-Version-12.pdf

Local members have also highlighted local concerns regarding foul drainage in the vicinity of Conway Close. The sewage system is rarely a constraint on a development, but Anglian Water should be contacted for confidence that proper sewerage provision can be made.

Waste Provision

The National Planning Policy Framework notes that the minimisation of waste is part of the environmental role of planning. The Suffolk Waste Plan, which forms part of the development plan for this area, includes Policy WDM17 which requires that development minimises waste and to facilitate the sorting of waste and promotion of recycling.

Individual sites can and will be required to consider how they meet those expectations. The District Council might also consider whether, in their view as the Waste Collection Authority, it would be justified to require that sites include on-site communal recycling facilities ('bring sites').

Felixstowe is served by a Household Waste Recycling Centre at Carr Road.

Under the new Community Infrastructure Levy regime, the County Council will identify what provision will need to be made to serve this population growth in the area and develop projects to meet demand. It is expected that Community Infrastructure Levy funds will be sought for this purpose.

[see attached document fo appendix]

Summary:

Para 7.8 Historic Environment. Archaeological remains are not included in the section on non-designated heritage assets. An informative section which highlights the archaeology of the area and its management in the development process to potential developers would be beneficial. Furthermore, archaeological heritage is a tourism asset for Suffolk and the development process can help promote understanding of our heritage.

Change to Plan

Change to Plan. Insert the following into historic environment section.

"The Felixstowe Area has a rich and diverse archaeological landscape. The river valleys, in particular, are topographically favourable for early occupation of all periods. The distinctive character of the historic environment includes coastal archaeology of all periods, upstanding prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of a Roman small town at Felixstowe, medieval historic villages with both above and below ground heritage asset, and the strategically placed, Napoleonic Martello towers. These are among over 7,300 sites of archaeological interest currently recorded in the Suffolk Historic Environment Record for Suffolk Coastal.

Suffolk County Council Archaeological Service routinely advises that there should be early consultation on the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework are met with regards to designated and non-designated heritage assets."

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

Attachments:

Kirton Sites FZ.pdf
Felixstowe Sites FZ.pdf
Kirton Sites SW.pdf
2015-11-23 Felixstowe AAP_SCC Final Response.pdf
Felixstowe Sites SW.pdf

O - 6909 - 3234 - 7.20 - None

6909 Object

Environment 7.20

Respondent: Mrs Julie Cornforth [3234] Agent: N/A

Full Text: It's no good protecting the "footpath links" to the countryside, if you don't protect the actual countryside on the

peninsula!!!!!

Summary: It's no good protecting the "footpath links" to the countryside, if you don't protect the actual countryside on the

peninsula!!!!

Change to Plan Protect the countryside......

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 6975 - 2564 - Preferred Policy FPP26: Areas to be protected from development - None

6975 Comment

Environment Preferred Policy FPP26: Areas to be protected from

development

Respondent: Kirton and Falkenham Parish Council (Mr Colin Agent: N/A

Shaw) [2564]

Full Text: Parish Council response to the SCDC FPAAP Preferred Options document public consultation

24th November 2015

1. Housing

A. Village capacity

Page 19. Preferred Policy FPP1 Housing. Kirton and Falkenham.

This table is confusing; it states the indicative requirement for 1/4/2015 to 31/3/2027, but does not take into account the actual approved figures; namely the 43 houses of the Taylor Wimpey development. The note of paragraph 3.10 does address this, but is easily missed if the table is read in isolation, as it will be. There should be a reference in the table to paragraph 3.10 and this paragraph should be quantitative rather than stating that the table gives minimum figures; namely that the approved applications 1/4/2015 to 31/3/2027 gives a total 50 for Kirton, which is 19% more than the Total Planned.

B. Site 325a

Page 37. Land at Bucklesham Road, Kirton, 325a. Also table on Page 99.

This site should be removed from this list of preferred options for the following reasons:

- a) Without this site, Kirton is already providing 50 houses, 8 more than the FPAAP requires, which is 19% above the 'minimum' figure. Therefore this site is not necessary.
- b) SCDC's sustainability analysis is overall negative for Social Effects, overall negative for Environmental Effects and slightly positive for Economic Effects. This gives an aggregate of negative sustainability, whilst every other preferred options site is assessed as positive sustainability. We note that SCDC does state that 325a scores poorly for environmental effects and that it is unlikely that these can be mitigated. Site 325a is the only unsustainable site in the list of preferred options and so should be removed. The Parish Council's previous recommendations for sustainability scores (attached at the back) [see attached document] have not been incorporated; these would give an even more negative score.
- c) Residents have raised valid concerns about the access visibility to the road and also the danger and frequent jams due to large agricultural vehicles and buses negotiating the narrow road with tight bends, unable to pass each other. Before this site is further considered SCDC should ask SCC Highways to hold a site visit at an advertised date and time, so that interested parties can express their concerns.
- d) Residents have also highlighted the effect on the environment; wildlife, trees and the Special Landscape Area, including this site. If this site is developed, then the entire village will lose the visual amenity of this Special Landscape Area. The Parish Council have already responded at SCDC's request to SCDC's Sustainability Analysis (attached at the back) [see attached document]; however many of our comments have not been incorporated in the Preferred Options. For example, the Parish Council advised that "To conserve and enhance the quality and local distinctiveness of landscapes and townscapes" should be marked "--" as opposed to SCDC's marking of "-/?".
- e) The pavement is insufficiently wide for pushchair and mobility scooters.
- f) At some point SCDC changed the indicative capacity from 7 to 15. Again this is an increase in housing beyond the capacity of the village's services and transport.
- C. Kirton should not be developed further unless local services and transport improve.
- a) The Parish Council has repeatedly stated that the current lack of services and transport in the village make it unsuitable to be developed as a dormitory, by further home building. To do so would impact greatly on the environment and quality of life of residents. The FPAAP's sustainability analysis makes clear that sites near centres of services and transport, such as Felixstowe and the Trimleys, score much higher on sustainability. Homes should be built near work places and retail, healthcare and transport facilities.
- b) As an example; those attending the Suffolk One Sixth Form College currently have to walk from Kirton to Trimley St. Martin to catch a bus to the school. Surely new housing should be located near services?
- c) There is particular concern that the housing increase in Kirton and Trimley St. Martin will put pressure on school capacity in the short and medium term; there has been no school capacity plan communicated which aligns with the site proposals. Further increase in the size of Trimley St. Martin School will cause deterioration of a currently severe traffic and parking problem at the school.
- d) As mentioned in the draft document, Anglia water will need to enhance the sewerage capacity if significant numbers of additional houses are built. This must be done as part of an end to end design, to ensure that problems are not created further up or downstream.

D. Bungalow Policy

SCDC have advised the Parish Council that SCDC cannot insist that bungalows are included in any future development, unless this is included as a policy in the FPAAP. The view of the village is that any future development should include bungalows.

Therefore, without in any way compromising the views above (that the village's lack of services and transport means that any further development is inappropriate), the FPAAP should include a statement that any future development in the village, which would be against the majority of parishioners' wishes and the Parish Council's advice, should include bungalows.

2. Physical Planning Boundary

C - 6975 - 2564 - Preferred Policy FPP26: Areas to be protected from development - None

6975 Comment

Environment

Preferred Policy FPP26: Areas to be protected from development

Page 115. Appendix 5 Kirton Inset Map

Replace inset map with the originally proposed new village envelope - see below [see attached document]; reviewed and agreed at public meeting with 250 parishioners, the Parish Council and representative from SCDC. Remove all proposed sites including 325a in the latest version, except for 712 which has already been approved.

3. Areas to be protected from development.

To include in the protected area of Falkenham the curtilage/area surrounding The Old Vicarage and The New House. This area has boundaries with the ANOB, the Church/Churchyard, open countryside and the curtilage of listed buildings. The area was previously protected from development as it was outside the village envelope and protection would put it in the same category as similar areas in Kirton and Bucklesham.

Being in a classification of Other Village or Open Countryside does not give protection from future development.

Summary:

To include in the protected area of Falkenham the curtilage/area surrounding The Old Vicarage and The New House. This area has boundaries with the ANOB, the Church/Churchyard, open countryside and the curtilage of listed buildings. The area was previously protected from development as it was outside the village envelope and protection would put it in the same category as similar areas in Kirton and Bucklesham.

Being in a classification of Other Village or Open Countryside does not give protection from future development.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

parpl2015fpaapPCresp.pdf

C - 7155 - 744 - Preferred Policy FPP26: Areas to be protected from development - None

7155 Comment

Environment Preferred Policy FPP26: Areas to be protected from

development

Respondent: Historic England (Sir/ Madam) [744] Agent: N/A

Full Text: Re: Preferred Options Public Consultation (19th October - 30th November 2015)

Felixstowe Peninsula Area Action Plan

Thank you for your letter dated 15th October 2015 regarding the above consultation. We have had the opportunity to assess the letter and consultation documents and can offer the following. Please note we have provided comments on the Site Allocations and Area Specific Policies within a separate letter to you dated the same. This follows a previous consultation and our comments dated 25th February 2015.

In terms of our general comments:

Recent Guidance from Historic England

We have recently published guidance on the Historic Environment and Site Allocations. Where we have not made comment below some additional guidance on ensuring a positive strategy for the historic environment is secured within the Felixstowe Area Action Plan can be seen by following this link- http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/.

In terms of our site specific comments:

Housing Sites

FPP4: Land north of Walton High Street, Felixstowe (451g)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the possible impact on the setting of two Listed Buildings, Grade II* Listed Walton Hall and Grade II Listed 362 High Street. We highlighted that the principal elevation of Walton Hall faces north and overlooks site 451g. It was considered that development here would urbanise the setting of this important, highly designated heritage asset, resulting in harm to its significance. It was expressed that harm would also be caused to the Grade II lodge and we strongly advised that an alternative site was found for development, though it was thought that there may be scope for some limited development at the eastern end of this site. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. The policy does however highlight that the development will need to be sympathetic to the Listed Buildings found at Walton Hall and 362 High Street. Whilst this would go some way to allay our concerns we still recommend that whilst it is considered the site can take a level of development there would be a detrimental harm to the setting of the Listed Buildings if the whole site is developed. If the site is to remain in the plan we would advise that the western end of the site is left relatively undeveloped to help protect the setting and it is considered that this side of the site might lend itself to fulfil the Public Open Space requirement.

FFP5: Land north of Conway Close, Felixstowe (502e)

We welcome the acknowledgment of the Listed Buildings and the requirement that development will need to be sympathetic to the Listed Buildings within the policy. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FFP6: Land opposite Hand in Hand Public House, Trimley St Martin (451b)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of two Grade II Listed Buildings (the Hand in Hand public house and Nos 251 and 253 High Road). We highlighted that both these buildings are traditional vernacular structures that date back to the agrarian origins of the village, and their current proximity to open countryside contributes to their setting and significance. We therefore encouraged the Local Planning Authority to identify alternative sites if at all possible so that the setting of these two buildings might be protected. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. However, it is also acknowledged that the policy requires a village green to be included within the scheme. The village green is to front High Road in order to reduce the impact on the setting of the Hand in Hand public house and this is particularly welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP7: Land off Howlett Way, Trimley St Martin (451c and 451d)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of the two Grade II listed churches and the Grade II listed Old Rectory. Whilst it is acknowledged that the consideration of the setting of the rectory is included within the policy, and this is welcomed, we would advise that the setting of the churches is also included. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP8: Land off Thurmans Lane, Trimley St Mary (383f and 451f)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of Grade II Listed Building Mill Farmhouse. It is acknowledged that there is a requirement in the policy that the development will need to be sympathetic to the setting of the mill and this is welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

Town Centre

FFP14: Felixstowe Town Centre and FFP15: Retail Frontages

As outlined within our response to you dated 25th February 2015 it is considered these policies should cover

C - 7155 - 744 - Preferred Policy FPP26: Areas to be protected from development - None

7155 Comment

Environment

Preferred Policy FPP26: Areas to be protected from development

conservation and design issues. It is considered the policies should highlight the importance of retaining or restoring historic shopfront features both in terms of the positive contribution historic shopfronts make to the character of an area but also the economic benefit of providing traditional and bespoke shopping units to shopowners. A good example of how historic shopfronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a National success. The council have also seen a ripple effect of surrounding properties being restored. As well as including conservation and design issues within these policies the Council could consider additional advice within a Supplementary Planning Guide on Historic Shopfronts, especially given the importance and contribution the Historic shopping areas within the settlements of Suffolk make to the wider area.

District Centres

FPP17: District Centres

As above it is considered that this policy should cover conservation and design issues. It should highlight the contribution the Historic Environment makes to the economic success of district centres and seek to protect and enhance both the setting of historic assets and assets themselves.

Tourism and Sea Front Activities

We welcome the inclusion of a section which covers tourism and seafront activities. It is considered that point 6.03 on page 61 could also acknowledge and highlight the wider and more general positive contribution to Felixstowe that heritage tourism brings.

FFP18: Felixstowe Ferry and Golf Course, FFP19: Felixstowe Ferry Golf Club to Cobbolds Point, FPP20: Cobbolds Point to Spa, FPP21: Spa to Martello Park and FFP22 Martello Park to Landguard We welcome and support the acknowledgement and required protection of the historic qualities of these sections of the coast.

FPP23: Car Parking

We welcome the 'high quality of design' requirement relating to replacement car parking at point 6.36 on page 72. It is considered that this requirement should be included within the policy itself to give it more weight in decision making.

The Environment

We welcome the inclusion of a section on the Historic Environment which sits separately from landscape and ecological elements. We also welcome the section on Locally Listed Buildings and Features. It is considered the Historic Environment section should also highlight Felixstowe's archaeology.

It is acknowledged that no individual policies on the Historic Environment are proposed for the Area Action Plan itself, relying instead on saved policies within the Core Strategy and the National Planning Policy Framework. The Core Strategy does not have a specific historic environment policy, with certain aspects covered in other policies such as SP15 (Landscape and Townscape) and DM21 (Design Aesthetics) and policies for specific settlements. It is considered that there is a lack of a clear strategy relating to the Historic Environment, relating to local issues, at present, and we would encourage greater clarity. This should set out the Council's approach to the management of designated and non-designated heritage assets (including archaeology) and how issues such as heritage at risk will be tackled. It is considered that a Historic Environment Policy could be locally specific to cover the Felixstowe Peninsula Area Action Plan.

In addition to the above it is acknowledged that the issue of Felixstowe South Conservation Area At Risk is not being covered by the Plan. We therefore reiterate our previous comments as follows, it would be advantageous if the Area Action Plan identified specific policies to help remove it from the register. These might include utilising the conservation area appraisal to identify locally important buildings that contribute positively to the conservation area, and introduction Article 4 directives to protect such buildings. There may also be sites which are considered negative contributors to the character and appearance of the conservation area and the preparation of development briefs for such sites might help bring forward positive redevelopment. The conservation area survey identified the loss of architectural detail as a significant problem, and consideration might therefore be given to applying to the Heritage Lottery Fund for a Townscape Heritage programme for the area, or a smaller partnership scheme with Historic England to reinstate lost architectural details on key buildings. We would therefore still recommend the inclusion of a policy which tackles the issues at Felixstowe South Conservation Area.

FPP26: Areas to be Protected from Development

In our response to you dated 25th February 2015 we expressed concerns regard the inclusion of all the sites in Trimley St Martin which would in effect surround a number of Listed Buildings including Grade II listed churches, the Grade II listed Old Rectory and Grade II Listed Building Mill Farmhouse. We recommended the inclusion of an area to be protected from development which would protect the remaining green wedge and as a result protect the setting of a number of Listed Buildings. It is acknowledged that the green wedge within Trimley St Martin is proposed to be included within the Areas to be Protected from Development and this is particularly welcomed and supported.

FPP27: Historic Park and Garden

We welcome the inclusion and the content of this policy.

C - 7155 - 744 - Preferred Policy FPP26: Areas to be protected from development - None

7155 Comment

Environment

Preferred Policy FPP26: Areas to be protected from development

Other Issues

Coastal Change Management and Areas of Flooding

We welcome the inclusion of this section. It is considered this section should also contain a paragraph on issues and opportunities of climate change and flooding relating to the Historic Environment. Further guidance on flooding issues can be found here- http://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/.

For information and for further policy consultation please note our new consultation email address for the East of England, eastplanningpolicy@HistoricEngland.org.uk.

Summary:

We previously expressed concerns regard the inclusion of all the sites in Trimley St Martin which would in effect surround a number of Listed Buildings including Grade II churches, the Grade II Old Rectory and Grade II Mill Farmhouse. We recommended the inclusion of an area to be protected from development which would protect the remaining green wedge and protect the setting of a number of Listed Buildings. It is acknowledged that the green wedge within Trimley St Martin is proposed to be included within the Areas to be Protected from Development and this is particularly welcomed and supported.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 6777 - 3060 - Preferred Policy FP27: Historic Park and Garden - None

6777 Comment

Environment

Preferred Policy FP27: Historic Park and Garden

Respondent: Felixstowe Town Council (Mr Ash Tadjrishi) [3060] Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Preferred Options Consultation

Thank you for the opportunity to respond to the Suffolk Coastal District Council Felixstowe Peninsula Area Action Plan Preferred Options paper. The Town Council considered this matter at its meeting of 11 November 2015.

Felixstowe Town Council was pleased to welcome and endorse the Felixstowe Peninsula Area Action Plan Preferred Options, subject to the following comments:

Page 13, Para. 2.02

We recommend adding the following to the end of the final sentence of this paragraph: ", as required by the July 2013 Local Plan."

Page 24, FPP3

Remove "(for residents and visitors)" from the bottom bullet relating to appropriate parking provision.

Page 26, Para. 3.30

This paragraph has been reduced in scope from an earlier draft and no longer references the unique location this site holds as a gateway to Felixstowe. It is vital that the policy ensures that any proposals for development of this site include appropriate consideration for this gateway and the statement this makes to those arriving to Felixstowe by road.

Page 27, FPP4

Remove "and Candlet Road" from the first bullet point. Any business units for this site should be restricted to the land adjacent to the A14 Dock Spur only.

Page 27, Title of 3.39

The title should read "Land" rather than "Lane" and include Swallow Close.

Page 29, FPP5

Please include Swallow Close and refer to this site as the "Land north of Conway Close and Swallow Close" throughout.

Page 49, Para. 5.06

Given the latest available information on these sites, this paragraph should be removed.

Page 50, Inset Map

The secondary shopping frontage should continue along Bent Hill on both sides of the road. It should also include the frontage of Trinity Methodist Church on Hamilton Road for consistency. Likewise the primary shopping area shaded in green should include this same section.

Page 51, Para. 5.10

Sentence should end "other than town centre uses".

Page 51, Para. 5.12

Please amend the final two sentences to read as follows:

"The scheme was not completed between Orwell Road and Bent Hill and the AAP will seek to encourage the continuation of the Shared Space along Hamilton Road. The completion of this scheme within the town centre boundary will provide a continuous link between Hamilton Road and Bent Hill and reinforce the connections between the town centre and the sea front."

Page 54, FPP15

Please amend the first paragraph to read "Any change of use proposals in this area should seek to retain a high proportion of retail activity."

Page 68, FPP21

Correction: "The provision of beach huts will be limited to those which currently exist. Any increased provision will be directed towards other parts of the sea front (namely Felixstowe Ferry Golf Club to Cobbolds Point Preferred Policy FPP19) as appropriate."

Page 74, FPP24

The policy should open with the following opening sentence:

"The need to strengthen Felixstowe as a seaside destination is recognised."

The next sentence should read: "Holiday accommodation will be encouraged and supported"

Page 82, FP27

This should be titled FPP27 rather than FP27.

C - 6777 - 3060 - Preferred Policy FP27: Historic Park and Garden - None

6777 Comment

Environment

Preferred Policy FP27: Historic Park and Garden

Please revise the first line of text to read "Spa Gardens and Town Hall Gardens".

Appendix 7:Felixstowe, Trimley St. Mary & Trimley St. Martin Inset Map.
The Physical Limits boundary in regard to the seaward boundary should be drawn as in the 2001 Local Plan map - i.e disappear in to the sea rather than be drawn along the low water mark.

The dotted blue line denoting Proposed Tourism Areas is misleading and these areas should be marked out to define the landward extent and total area covered by those corresponding policies. Landguard peninsula should also be encapsulated whereas the line appears to end at Landguard point. As above, the lines between the areas should simply stop at the sea. The extensions of those lines into the sea can be wrongly interpreted as representing a policy as applying to an element of the sea.

The port area should be included within the Physical Limits boundary as is the case in the 2001 Local Plan map. The Physical Limits boundary in the Manor End area should include the caravan parks and Custom House, terminating at the boundary of Landguard Common.

The colouring of some of the designations on the main map are confusingly similar, notably those for the Proposed District Centre, the District Centre boundary and the revised Physical Limits boundary. Also, the use of very heavy lines at the scale of the main map is unhelpful.

Notwithstanding these observations, thank you for the opportunity to have been consulted. The Town Council looks forward to receiving information on the further development of the Area Action Plan.

Summary:

Page 82, FP27

This should be titled FPP27 rather than FP27.

Please revise the first line of text to read "Spa Gardens and Town Hall Gardens".

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

AAP Preferred Options Consultation Response.pdf

S - 7156 - 744 - Preferred Policy FP27: Historic Park and Garden - None

7156 Support

Environment Preferred Policy FP27: Historic Park and Garden

Respondent: Historic England (Sir/ Madam) [744] Agent: N/A

Full Text: Re: Preferred Options Public Consultation (19th October - 30th November 2015)

Felixstowe Peninsula Area Action Plan

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Recent Guidance from Historic England

We have recently published guidance on the Historic Environment and Site Allocations. Where we have not made comment below some additional guidance on ensuring a positive strategy for the historic environment is secured within the Felixstowe Area Action Plan can be seen by following this link- http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/.

In terms of our site specific comments:

Housing Sites

FPP4: Land north of Walton High Street, Felixstowe (451g)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the possible impact on the setting of two Listed Buildings, Grade II* Listed Walton Hall and Grade II Listed 362 High Street. We highlighted that the principal elevation of Walton Hall faces north and overlooks site 451g. It was considered that development here would urbanise the setting of this important, highly designated heritage asset, resulting in harm to its significance. It was expressed that harm would also be caused to the Grade II lodge and we strongly advised that an alternative site was found for development, though it was thought that there may be scope for some limited development at the eastern end of this site. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. The policy does however highlight that the development will need to be sympathetic to the Listed Buildings found at Walton Hall and 362 High Street. Whilst this would go some way to allay our concerns we still recommend that whilst it is considered the site can take a level of development there would be a detrimental harm to the setting of the Listed Buildings if the whole site is developed. If the site is to remain in the plan we would advise that the western end of the site is left relatively undeveloped to help protect the setting and it is considered that this side of the site might lend itself to fulfil the Public Open Space requirement.

FFP5: Land north of Conway Close, Felixstowe (502e)

We welcome the acknowledgment of the Listed Buildings and the requirement that development will need to be sympathetic to the Listed Buildings within the policy. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FFP6: Land opposite Hand in Hand Public House, Trimley St Martin (451b)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of two Grade II Listed Buildings (the Hand in Hand public house and Nos 251 and 253 High Road). We highlighted that both these buildings are traditional vernacular structures that date back to the agrarian origins of the village, and their current proximity to open countryside contributes to their setting and significance. We therefore encouraged the Local Planning Authority to identify alternative sites if at all possible so that the setting of these two buildings might be protected. Although Historic England raised concerns regarding the development of this site it is acknowledged that this site remains within the plan. However, it is also acknowledged that the policy requires a village green to be included within the scheme. The village green is to front High Road in order to reduce the impact on the setting of the Hand in Hand public house and this is particularly welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP7: Land off Howlett Way, Trimley St Martin (451c and 451d)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of the two Grade II listed churches and the Grade II listed Old Rectory. Whilst it is acknowledged that the consideration of the setting of the rectory is included within the policy, and this is welcomed, we would advise that the setting of the churches is also included. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

FPP8: Land off Thurmans Lane, Trimley St Mary (383f and 451f)

In our response to you dated 25th February 2015 we expressed concerns in respect of the site due to the impact on the setting of Grade II Listed Building Mill Farmhouse. It is acknowledged that there is a requirement in the policy that the development will need to be sympathetic to the setting of the mill and this is welcomed. It is considered that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings.

Town Centre

FFP14: Felixstowe Town Centre and FFP15: Retail Frontages

As outlined within our response to you dated 25th February 2015 it is considered these policies should cover

S - 7156 - 744 - Preferred Policy FP27: Historic Park and Garden - None

7156 Support

Environment

Preferred Policy FP27: Historic Park and Garden

conservation and design issues. It is considered the policies should highlight the importance of retaining or restoring historic shopfront features both in terms of the positive contribution historic shopfronts make to the character of an area but also the economic benefit of providing traditional and bespoke shopping units to shopowners. A good example of how historic shopfronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a National success. The council have also seen a ripple effect of surrounding properties being restored. As well as including conservation and design issues within these policies the Council could consider additional advice within a Supplementary Planning Guide on Historic Shopfronts, especially given the importance and contribution the Historic shopping areas within the settlements of Suffolk make to the wider area.

District Centres

FPP17: District Centres

As above it is considered that this policy should cover conservation and design issues. It should highlight the contribution the Historic Environment makes to the economic success of district centres and seek to protect and enhance both the setting of historic assets and assets themselves.

Tourism and Sea Front Activities

We welcome the inclusion of a section which covers tourism and seafront activities. It is considered that point 6.03 on page 61 could also acknowledge and highlight the wider and more general positive contribution to Felixstowe that heritage tourism brings.

FFP18: Felixstowe Ferry and Golf Course, FFP19: Felixstowe Ferry Golf Club to Cobbolds Point, FPP20: Cobbolds Point to Spa, FPP21: Spa to Martello Park and FFP22 Martello Park to Landguard We welcome and support the acknowledgement and required protection of the historic qualities of these sections of the coast.

FPP23: Car Parking

We welcome the 'high quality of design' requirement relating to replacement car parking at point 6.36 on page 72. It is considered that this requirement should be included within the policy itself to give it more weight in decision making.

The Environment

We welcome the inclusion of a section on the Historic Environment which sits separately from landscape and ecological elements. We also welcome the section on Locally Listed Buildings and Features. It is considered the Historic Environment section should also highlight Felixstowe's archaeology.

It is acknowledged that no individual policies on the Historic Environment are proposed for the Area Action Plan itself, relying instead on saved policies within the Core Strategy and the National Planning Policy Framework. The Core Strategy does not have a specific historic environment policy, with certain aspects covered in other policies such as SP15 (Landscape and Townscape) and DM21 (Design Aesthetics) and policies for specific settlements. It is considered that there is a lack of a clear strategy relating to the Historic Environment, relating to local issues, at present, and we would encourage greater clarity. This should set out the Council's approach to the management of designated and non-designated heritage assets (including archaeology) and how issues such as heritage at risk will be tackled. It is considered that a Historic Environment Policy could be locally specific to cover the Felixstowe Peninsula Area Action Plan.

In addition to the above it is acknowledged that the issue of Felixstowe South Conservation Area At Risk is not being covered by the Plan. We therefore reiterate our previous comments as follows, it would be advantageous if the Area Action Plan identified specific policies to help remove it from the register. These might include utilising the conservation area appraisal to identify locally important buildings that contribute positively to the conservation area, and introduction Article 4 directives to protect such buildings. There may also be sites which are considered negative contributors to the character and appearance of the conservation area and the preparation of development briefs for such sites might help bring forward positive redevelopment. The conservation area survey identified the loss of architectural detail as a significant problem, and consideration might therefore be given to applying to the Heritage Lottery Fund for a Townscape Heritage programme for the area, or a smaller partnership scheme with Historic England to reinstate lost architectural details on key buildings. We would therefore still recommend the inclusion of a policy which tackles the issues at Felixstowe South Conservation Area.

FPP26: Areas to be Protected from Development

In our response to you dated 25th February 2015 we expressed concerns regard the inclusion of all the sites in Trimley St Martin which would in effect surround a number of Listed Buildings including Grade II listed churches, the Grade II listed Old Rectory and Grade II Listed Building Mill Farmhouse. We recommended the inclusion of an area to be protected from development which would protect the remaining green wedge and as a result protect the setting of a number of Listed Buildings. It is acknowledged that the green wedge within Trimley St Martin is proposed to be included within the Areas to be Protected from Development and this is particularly welcomed and supported.

FPP27: Historic Park and Garden

We welcome the inclusion and the content of this policy.

S - 7156 - 744 - Preferred Policy FP27: Historic Park and Garden - None

7156 Support

Environment Preferred Policy FP27: Historic Park and Garden

Other Issues

Coastal Change Management and Areas of Flooding

We welcome the inclusion of this section. It is considered this section should also contain a paragraph on issues and opportunities of climate change and flooding relating to the Historic Environment. Further guidance on flooding issues can be found here- http://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/.

For information and for further policy consultation please note our new consultation email address for the East of

England, eastplanningpolicy@HistoricEngland.org.uk.

Summary: We welcome the inclusion and the content of this policy.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

S - 7157 - 744 - 8.01 - None

7157 Support

Other Issues 8.01

Respondent: Historic England (Sir/ Madam) [744] Agent: N/A

Full Text: Re: Preferred Options Public Consultation (19th October - 30th November 2015)

Felixstowe Peninsula Area Action Plan

Thank you for your letter dated 15th October 2015 regarding the above consultation. We have had the opportunity to assess the letter and consultation documents and can offer the following. Please note we have provided comments on the Site Allocations and Area Specific Policies within a separate letter to you dated the same. This follows a previous consultation and our comments dated 25th February 2015.

In terms of our general comments:

Recent Guidance from Historic England

We have recently published guidance on the Historic Environment and Site Allocations. Where we have not made comment below some additional guidance on ensuring a positive strategy for the historic environment is secured within the Felixstowe Area Action Plan can be seen by following this link- http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/.

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S - 7157 - 744 - 8.01 - None

7157 Support

Other Issues 8.01

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FPP27: Historic Park and Garden

We welcome the inclusion and the content of this policy.

S - 7157 - 744 - 8.01 - None

7157 Support

Other Issues 8.01

Other Issues

Coastal Change Management and Areas of Flooding

We welcome the inclusion of this section. It is considered this section should also contain a paragraph on issues and opportunities of climate change and flooding relating to the Historic Environment. Further guidance on flooding issues can be found here- http://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/.

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Summary:

Coastal Change Management and Areas of Flooding

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Change to Plan

N/A

Appear at exam?
Not Specified

Legal?
Not Specified

Sound? Not Specified Duty to Cooperate?

Soundness Tests

Not Specified N/

C - 7060 - 2600 - 8.02 - None

7060 Comment

Other Issues 8.02

Respondent: Deben Estuary Partnership (Christine Block) [2600] Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Preferred Options Consultation Document

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Tourism and Sea Front Activities Felixstowe Ferry and Golf Course

- * In the context of the Felixstowe Peninsula Area Action Plan objective 'to reduce vulnerability to flooding' the section relating to Felixstowe Ferry makes no reference to the substantial flood defence management issues which affect the mouth of the Deben Estuary and, therefore, the future of this area including the Ferry hamlet.

 This could be addressed by referring to the Deben Estuary Plan Estuary Policy Areas Flood Defence Management Page 26 Felixstowe Ferry Estuary Defence
- * This section makes no reference to the seasonal foot ferry between Felixstowe Ferry and Bawdsey Ferry. This is favoured by tourists (22,000 passengers in 2015). It provides important access to the internationally significant Radar Museum at Bawdsey Manor, offers a link in the net work of national cycle trails and will be important as part of the national coastal trail.

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Environment

7.01 'minimising the impact of new development on sites identified as internationally important for nature conservation 'Justification for minimising and mitigating the impact of new development should not only consider designated sites but include reference to conserving and enhancing the landscape and characteristic features of the Deben Estuary, valuing the landscape of the Felixstowe Peninsula as seen from the river, ensuring that new build is sensitive to the estuary topography and lessening light pollution in areas where lights will be visible from across a wide estuary area. (The quality of the landscape, the biodiversity and 'peace and tranquillity' of the estuary environment are recognised as one of the main reasons visitors choose to stay in the area.)

7.02 Reference to importance of high quality agricultural land to the north of Felixstowe. The importance lies not so much in the grade of land but in the combination of light soils, mild climate and access to irrigation which allows early and late vegetable cropping - now of national importance.

7.03 Reference to mitigating the impact of future development - targeted mitigation measures are also noted in the Deben Estuary Plan. Disturbance of the hinterland feeding and roosting areas of the species listed in connection with SPA / RAMSAR designations - ie behind the intertidal estuary - may also require mitigation.

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Other issues

* The area covered by the Felixstowe Peninsula Area Action Plan includes a section of the Deben Estuary but no mention is made to the significant flood defence issues which apply to the mouth and lower reaches of the river. This could be addressed by referring to the Deben Estuary Plan.

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Saved policies

AP 191 Felixstowe: Houseboats at Felixstowe

- * The Deben Estuary Plan notes the character that houseboats bring to parts of the river but puts forward guidelines which aim to establish common criteria across the whole estuary.. At the moment policies cover Felixstowe / Melton / and Woodbridge but ignore houseboats at Martlesham Creek.
- * Under 'How these policy issues are now being dealt with' reference should be made to the endorsed Deben Estuary

Summary:

The area covered by the Felixstowe Peninsula Area Action Plan includes a section of the Deben Estuary but no mention is made to the significant flood defence issues which apply to the mouth and lower reaches of the river. This could be addressed by referring to the Deben Estuary Plan.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7216 - 543 - 8.06 - None

7216 Comment

Other Issues 8.06

Respondent: The Environment Agency (Mr Andrew Hunter) [543] Agent: N/A

Full Text:

PREFERRED OPTIONS PUBLIC CONSULTATION FOR SITE ALLOCATIONS AND AREA SPECIFIC POLICIES AND FELIXSTOWE PENINSULA AREA ACTION PLAN.

Thank you for your consultation received 19 October for the Preferred Options Site Allocations and Area Specific Policies and Felixstowe Peninsula Area Action Plan. We have reviewed both documents and offer the following advisory comments:

SITE ALLOCATIONS AND AREA SPECIFIC POLICIES

Section 2 Housing

As you are aware, we have commented previously on the proposed allocations, highlighting the environmental constraints at each location. We have no significant concerns with the preferred options, but offer the following comments:

SSP12 - Land north east of Street Farm, Saxmundham

This is a site that we have not commented on previously. We advise that given its size (2.18ha), a Flood Risk Assessment (FRA) will be required to consider surface water disposal (see also comments below). The site overlies a Principal Aquifer and is within an Environment Agency Groundwater Source Protection Zone 3(Principal and Secondary aquifers and Environment Agency Groundwater Source Protection Zones 1, 2 and 3 are regarded as sensitive environmental receptors. This footnote should be regarded as applying to all references throughout this letter to such receptors. Given these receptors, the use of pollution prevention and control measures will need consideration at the planning application stage as will any proposal for deep bore soakaways to manage surface water). This does not affect the site allocation but may cause comment from us if, for example, deep bore soakaways were proposed to manage surface water.

SSP13 - Land fronting Old Homes Road, Thorpeness

As above, no concerns but we would highlight that the site overlies Principal Aquifer.

SSP14 - Land south of Lower Road, Westerfield

We note the acknowledgement within this policy of the need for an FRA if the built (housing) development extends over 1ha or more. The need for an FRA is also referenced in SSP15. However, this requirement is not mentioned for all sites of more than 1 hectare. Other housing sites that would require an FRA due to their size are: SSP3, SSP8, SSP10 and SSP11.

We suggest that a consistent approach to this issue should be applied throughout the document.

SSP16 - Land at Street Farm, Witnesham

The text supporting this policy (paragraph 2.78), highlights that residential development within Flood Zone 3 should be avoided. We would suggest that this should be amended to "any development within Flood Zone 3 should be avoided". This is to ensure that no other impediments to flows are introduced that could increase flood risk downstream. This requirement is a key issue for this site, and should also be included as part of the policy.

We would also suggest that any opportunities to improve and enhance the riverside environment at this location should be considered under the Water Framework Directive.

Section 3 Economy

SSP18 - Ransomes, Nacton Heath

The site overlies Principal and Secondary A Aquifers. This does not necessarily affect the allocation of this site but may impact on future uses or activities. Contamination from previous uses will need to be investigated ahead of the submission of any planning application.

As with the housing sites, all proposals for development of greater than 1ha should be accompanied by an FRA.

SSP19 - Land at Silverlace Green (former airfield), Parham

The site overlies a Principal Aquifer. The western end of the site falls with an Environment Agency Groundwater Source Protection Zone (SPZ) 1, the eastern end SPZ3 and the central section SPZ2. This is associated with the public supply borehole located at TM31686019. As above, this does not necessarily affect the site allocation but may impact on future uses or activities. Contamination from previous uses, particularly those associated with former airfields, will need to be investigated ahead of the submission of any planning application.

SSP21 - Former Airfield, Debach

The site overlies a Principal Aquifer, with a groundwater abstraction licence in place approximately 50m from the site boundary at TM23755413. As above, this does not necessarily affect the site allocation but may impact on future uses or activities. Contamination from previous uses will need to be investigated ahead of the submission of any planning application.

C - 7216 - 543 - 8.06 - None

7216 Comment

Other Issues 8.06

SSP22 Rendlesham (Bentwaters)

The site overlies Principal and Secondary Aquifers. This does not necessarily affect the site allocation but may impact on future uses or activities. Contamination from previous uses, particularly those associated with former airfields, will need to be investigated ahead of the submission of any planning application.

SSP23 - Carlton Park, Main Road, Kelsale cum Carlton

The site overlies a Principal Aquifer and is within an Environment Agency Groundwater Source Protection Zone 3. This does not necessarily affect the site allocation but may impact on future uses or activities. Contamination from previous uses, particularly those associated with former airfields, will need to be investigated ahead of the submission of any planning application.

The site also includes a small area of Flood Zone 3 along the southern boundary, and a wider extent of Flood Zone 2 which encroaches into the undeveloped area. Any proposals for development must have regard to this issue and be accompanied by an FRA.

SSP24 - Levington Park, Levington

The site overlies Principal Aquifer.

SSP25 - Riverside Industrial Estate, Border Cot Lane, Wickham Market

The site overlies a Principal Aquifer and is within an Environment Agency Groundwater Source Protection Zone 2. This does not necessarily affect the site allocation but may impact on future uses or activities. Contamination from previous uses, particularly those associated with former airfields, will need to be investigated ahead of the submission of any planning application.

Section 4 Retail

SSP31 - Snape Maltings

We note that the further use of this site is supported, following the preparation of a comprehensive development scheme which is to include "flood defence measures". While we welcome this reference, given that the site mostly falls within Flood Zone 3, we would suggest that the wording could be amended to ensure that the impacts and implications of flood risk are considered across the site. We would suggest as an alternative: "flood risk management across the site, including appropriate flood defence measures".

SSP32 - Suffolk Showground - Trinity Park

Although not within our remit we assume Suffolk Wildlife Trust have made reference to the avoidance/ mitigation of impacts from potential housing development on the immediately adjacent rare lowland heath habitat at the Purdis Heath SSSI.

Section 7 Environment

Other issues - Coastal Change Management Areas and flooding

SSP38 - Coastal Change Management Area

We welcome the approach to development in the coastal zone as detailed in paragraphs 7.24 - 7.33. We agree with the types of development proposed to be permitted in the short, medium and long term erosion zones as an appropriate balance of needs against inevitable coastal change. We would suggest that the Policy should make specific reference to the development types as described in paragraph 7.30.

We welcome the application of a 30m 'buffer zone' landward of Shoreline Management Plan (SMP) erosion predictions where Vulnerability Assessments will be required to support appropriate development.

The SMP is a living document and the policies can be subject to review and change under certain circumstances, for example the recent policy change at Thorpeness. We recommend that, if possible, a flexible approach is taken where the coastal erosion constraint area can be modified in the event of a change in circumstance leading to a modification of SMP policy.

SSP39 - Relocation and Replacement of Development Affected by Coastal Erosion Risk

We welcome this approach to reduce the number of assets at risk along the vulnerable sections of coast. We are particularly supportive of the proposal to allow new replacement development outside the long term erosion zones.

Flooding and Flood Risk

While we are generally supportive of this section, we would point out that the statement in paragraph 7.38: "The Site Allocations Document does not propose any future development or intensification on sites which are within flood zones 2 and 3" is not correct. As highlighted above, a number of sites do include elements of Flood Zone 2 & 3, which will need to be appropriately considered as part of any development proposals. This will include applying the sequential approach, and directing development within the site away from those areas at risk wherever possible.

FELIXSTOWE PENINSULA AREA ACTION PLAN

C - 7216 - 543 - 8.06 - None

7216 Comment

Other Issues 8.06

We have reviewed the Area Action Plan (AAP) and we are generally supportive of part 7.0 Environment; however, we have the following comments on part 8.0 Other Issues - Coastal Change Management Areas and flooding.

Paragraph 8.06 - This paragraph is factually incorrect as it states that there are no future development sites located within the flood zone. However, the Sunday Market Site, Sea Road, Felixstowe (mentioned in the second sentence) is located in the flood zone.

In addition, this paragraph goes onto state that this site is appropriate because 'only part of the site is within the flood zone'. However, this site is wholly in flood zones 2 and 3, with the majority of the site in flood zone 2. As such we would recommend that this paragraph is amended as follows:

The AAP proposes one mixed use residential scheme within flood zones 3 and 2; the site which delivers an active commercial ground floor frontage is proposed on Sea Road. This site is considered to be appropriate as the majority of the site is located in flood zone 2 and as the regeneration benefit gained from the redevelopment of the site outweighs the flood risk in this case. All the other sites proposed by the AAP including future development or intensification are located outside the flood zone.'

Paragraph 8.07 - This paragraph states that applicants will need to consider flood mitigation for sites in partnership with us. However, whilst we would wish the applicant to liaise with us regarding flood mitigation, we would provide advice on a chargeable basis. Therefore we request that you remove the reference to us in this paragraph.

The second sentence of this paragraph seems to have a negative connotation and it is suggested that this is deleted and the third sentence is amended to clearly reference sites within a flood zone.

We would suggest the following wording for this paragraph:

Should any future proposals for redevelopment of sites within the flood zone come forward, it will be necessary for the applicant, to consider the introduction of further flood mitigation measures along the River Orwell and in areas adjacent to the existing Port of Felixstowe. Any proposals on sites which are within a flood zone will need to ensure that mitigation measures are taken into account as part of the design as well as ensuring that occupants have a safe internal route of escape to first floor level.

We trust this advice is helpful.

Summary:

This paragraph is factually incorrect as it states that there are no future development sites located within the flood zone. However, the Sunday Market Site, Sea Road, Felixstowe (mentioned in the second sentence) is located in the flood zone. In addition, this paragraph goes onto state that this site is appropriate because 'only part of the site is within the flood zone'. However, this site is wholly in flood zones 2 and 3, with the majority of the site in flood zone 2.

Change to Plan

We would recommend that this paragraph is amended as follows:

'The AAP proposes one mixed use residential scheme within flood zones 3 and 2; the site which delivers an active commercial ground floor frontage is proposed on Sea Road. This site is considered to be appropriate as the majority of the site is located in flood zone 2 and as the regeneration benefit gained from the redevelopment of the site outweighs the flood risk in this case. All the other sites proposed by the AAP including future development or intensification are located outside the flood zone.'

Appear at exam? Not Specified Legal?
Not Specified

Sound? Not Specified **Duty to Cooperate?**Not Specified

Soundness Tests

None

C - 7217 - 543 - 8.07 - None

7217 Comment

Other Issues 8.07

Respondent: The Environment Agency (Mr Andrew Hunter) [543] Agent: N/A

Full Text:

PREFERRED OPTIONS PUBLIC CONSULTATION FOR SITE ALLOCATIONS AND AREA SPECIFIC POLICIES AND FELIXSTOWE PENINSULA AREA ACTION PLAN.

Thank you for your consultation received 19 October for the Preferred Options Site Allocations and Area Specific Policies and Felixstowe Peninsula Area Action Plan. We have reviewed both documents and offer the following advisory comments:

SITE ALLOCATIONS AND AREA SPECIFIC POLICIES

Section 2 Housing

As you are aware, we have commented previously on the proposed allocations, highlighting the environmental constraints at each location. We have no significant concerns with the preferred options, but offer the following comments:

SSP12 - Land north east of Street Farm, Saxmundham

This is a site that we have not commented on previously. We advise that given its size (2.18ha), a Flood Risk Assessment (FRA) will be required to consider surface water disposal (see also comments below). The site overlies a Principal Aquifer and is within an Environment Agency Groundwater Source Protection Zone 3(Principal and Secondary aquifers and Environment Agency Groundwater Source Protection Zones 1, 2 and 3 are regarded as sensitive environmental receptors. This footnote should be regarded as applying to all references throughout this letter to such receptors. Given these receptors, the use of pollution prevention and control measures will need consideration at the planning application stage as will any proposal for deep bore soakaways to manage surface water). This does not affect the site allocation but may cause comment from us if, for example, deep bore soakaways were proposed to manage surface water.

SSP13 - Land fronting Old Homes Road, Thorpeness

As above, no concerns but we would highlight that the site overlies Principal Aquifer.

SSP14 - Land south of Lower Road, Westerfield

We note the acknowledgement within this policy of the need for an FRA if the built (housing) development extends over 1ha or more. The need for an FRA is also referenced in SSP15. However, this requirement is not mentioned for all sites of more than 1 hectare. Other housing sites that would require an FRA due to their size are: SSP3, SSP8, SSP10 and SSP11.

We suggest that a consistent approach to this issue should be applied throughout the document.

SSP16 - Land at Street Farm, Witnesham

The text supporting this policy (paragraph 2.78), highlights that residential development within Flood Zone 3 should be avoided. We would suggest that this should be amended to "any development within Flood Zone 3 should be avoided". This is to ensure that no other impediments to flows are introduced that could increase flood risk downstream. This requirement is a key issue for this site, and should also be included as part of the policy.

We would also suggest that any opportunities to improve and enhance the riverside environment at this location should be considered under the Water Framework Directive.

Section 3 Economy

SSP18 - Ransomes, Nacton Heath

The site overlies Principal and Secondary A Aquifers. This does not necessarily affect the allocation of this site but may impact on future uses or activities. Contamination from previous uses will need to be investigated ahead of the submission of any planning application.

As with the housing sites, all proposals for development of greater than 1ha should be accompanied by an FRA.

SSP19 - Land at Silverlace Green (former airfield), Parham

The site overlies a Principal Aquifer. The western end of the site falls with an Environment Agency Groundwater Source Protection Zone (SPZ) 1, the eastern end SPZ3 and the central section SPZ2. This is associated with the public supply borehole located at TM31686019. As above, this does not necessarily affect the site allocation but may impact on future uses or activities. Contamination from previous uses, particularly those associated with former airfields, will need to be investigated ahead of the submission of any planning application.

SSP21 - Former Airfield, Debach

The site overlies a Principal Aquifer, with a groundwater abstraction licence in place approximately 50m from the site boundary at TM23755413. As above, this does not necessarily affect the site allocation but may impact on future uses or activities. Contamination from previous uses will need to be investigated ahead of the submission of any planning application.

C - 7217 - 543 - 8.07 - None

7217 Comment

Other Issues 8.07

SSP22 Rendlesham (Bentwaters)

The site overlies Principal and Secondary Aquifers. This does not necessarily affect the site allocation but may impact on future uses or activities. Contamination from previous uses, particularly those associated with former airfields, will need to be investigated ahead of the submission of any planning application.

SSP23 - Carlton Park, Main Road, Kelsale cum Carlton

The site overlies a Principal Aquifer and is within an Environment Agency Groundwater Source Protection Zone 3. This does not necessarily affect the site allocation but may impact on future uses or activities. Contamination from previous uses, particularly those associated with former airfields, will need to be investigated ahead of the submission of any planning application.

The site also includes a small area of Flood Zone 3 along the southern boundary, and a wider extent of Flood Zone 2 which encroaches into the undeveloped area. Any proposals for development must have regard to this issue and be accompanied by an FRA.

SSP24 - Levington Park, Levington

The site overlies Principal Aquifer.

SSP25 - Riverside Industrial Estate, Border Cot Lane, Wickham Market

The site overlies a Principal Aquifer and is within an Environment Agency Groundwater Source Protection Zone 2. This does not necessarily affect the site allocation but may impact on future uses or activities. Contamination from previous uses, particularly those associated with former airfields, will need to be investigated ahead of the submission of any planning application.

Section 4 Retail

SSP31 - Snape Maltings

We note that the further use of this site is supported, following the preparation of a comprehensive development scheme which is to include "flood defence measures". While we welcome this reference, given that the site mostly falls within Flood Zone 3, we would suggest that the wording could be amended to ensure that the impacts and implications of flood risk are considered across the site. We would suggest as an alternative: "flood risk management across the site, including appropriate flood defence measures".

SSP32 - Suffolk Showground - Trinity Park

Although not within our remit we assume Suffolk Wildlife Trust have made reference to the avoidance/ mitigation of impacts from potential housing development on the immediately adjacent rare lowland heath habitat at the Purdis Heath SSSI.

Section 7 Environment

Other issues - Coastal Change Management Areas and flooding

SSP38 - Coastal Change Management Area

We welcome the approach to development in the coastal zone as detailed in paragraphs 7.24 - 7.33. We agree with the types of development proposed to be permitted in the short, medium and long term erosion zones as an appropriate balance of needs against inevitable coastal change. We would suggest that the Policy should make specific reference to the development types as described in paragraph 7.30.

We welcome the application of a 30m 'buffer zone' landward of Shoreline Management Plan (SMP) erosion predictions where Vulnerability Assessments will be required to support appropriate development.

The SMP is a living document and the policies can be subject to review and change under certain circumstances, for example the recent policy change at Thorpeness. We recommend that, if possible, a flexible approach is taken where the coastal erosion constraint area can be modified in the event of a change in circumstance leading to a modification of SMP policy.

SSP39 - Relocation and Replacement of Development Affected by Coastal Erosion Risk

We welcome this approach to reduce the number of assets at risk along the vulnerable sections of coast. We are particularly supportive of the proposal to allow new replacement development outside the long term erosion zones.

Flooding and Flood Risk

While we are generally supportive of this section, we would point out that the statement in paragraph 7.38: "The Site Allocations Document does not propose any future development or intensification on sites which are within flood zones 2 and 3" is not correct. As highlighted above, a number of sites do include elements of Flood Zone 2 & 3, which will need to be appropriately considered as part of any development proposals. This will include applying the sequential approach, and directing development within the site away from those areas at risk wherever possible.

FELIXSTOWE PENINSULA AREA ACTION PLAN

C - 7217 - 543 - 8.07 - None

7217 Comment

Other Issues 8.07

We have reviewed the Area Action Plan (AAP) and we are generally supportive of part 7.0 Environment; however, we have the following comments on part 8.0 Other Issues - Coastal Change Management Areas and flooding.

Paragraph 8.06 - This paragraph is factually incorrect as it states that there are no future development sites located within the flood zone. However, the Sunday Market Site, Sea Road, Felixstowe (mentioned in the second sentence) is located in the flood zone.

In addition, this paragraph goes onto state that this site is appropriate because 'only part of the site is within the flood zone'. However, this site is wholly in flood zones 2 and 3, with the majority of the site in flood zone 2. As such we would recommend that this paragraph is amended as follows:

'The AAP proposes one mixed use residential scheme within flood zones 3 and 2; the site which delivers an active commercial ground floor frontage is proposed on Sea Road. This site is considered to be appropriate as the majority of the site is located in flood zone 2 and as the regeneration benefit gained from the redevelopment of the site outweighs the flood risk in this case. All the other sites proposed by the AAP including future development or intensification are located outside the flood zone.'

Paragraph 8.07 - This paragraph states that applicants will need to consider flood mitigation for sites in partnership with us. However, whilst we would wish the applicant to liaise with us regarding flood mitigation, we would provide advice on a chargeable basis. Therefore we request that you remove the reference to us in this paragraph.

The second sentence of this paragraph seems to have a negative connotation and it is suggested that this is deleted and the third sentence is amended to clearly reference sites within a flood zone.

We would suggest the following wording for this paragraph:

Should any future proposals for redevelopment of sites within the flood zone come forward, it will be necessary for the applicant, to consider the introduction of further flood mitigation measures along the River Orwell and in areas adjacent to the existing Port of Felixstowe. Any proposals on sites which are within a flood zone will need to ensure that mitigation measures are taken into account as part of the design as well as ensuring that occupants have a safe internal route of escape to first floor level.

We trust this advice is helpful.

Summary:

This paragraph states that applicants will need to consider flood mitigation for sites in partnership with us. However, whilst we would wish the applicant to liaise with us regarding flood mitigation, we would provide advice on a chargeable basis. Therefore we request that you remove the reference to us in this paragraph.

The second sentence of this paragraph seems to have a negative connotation and it is suggested that this is deleted and the third sentence is amended to clearly reference sites within a flood zone.

Change to Plan

We would suggest the following wording for this paragraph:

Should any future proposals for redevelopment of sites within the flood zone come forward, it will be necessary for the applicant, to consider the introduction of further flood mitigation measures along the River Orwell and in areas adjacent to the existing Port of Felixstowe. Any proposals on sites which are within a flood zone will need to ensure that mitigation measures are taken into account as part of the design as well as ensuring that occupants have a safe internal route of escape to first floor level.

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7061 - 2600 - Appendix 2: Local Plan Saved Policies and how the issues are now being dealt with - None

7061 Comment

Appendix 2: Local Plan Saved Policies and how the issues are now being dealt with

Appendix 2: Local Plan Saved Policies and how the issues are now being dealt with

Respondent: Deben Estuary Partnership (Christine Block) [2600] Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Preferred Options Consultation Document

Page 61

Tourism and Sea Front Activities Felixstowe Ferry and Golf Course

* In the context of the Felixstowe Peninsula Area Action Plan objective 'to reduce vulnerability to flooding' - the section relating to Felixstowe Ferry makes no reference to the substantial flood defence management issues which affect the mouth of the Deben Estuary - and, therefore, the future of this area - including the Ferry hamlet.

This could be addressed by referring to the Deben Estuary Plan - Estuary Policy Areas - Flood Defence Management - Page 26 - Felixstowe Ferry - Estuary Defence

* This section makes no reference to the seasonal foot ferry between Felixstowe Ferry and Bawdsey Ferry. This is favoured by tourists (22,000 passengers in 2015). It provides important access to the internationally significant Radar Museum at Bawdsey Manor, offers a link in the net work of national cycle trails and will be important as part of the national coastal trail.

Page 76

Environment

7.01 'minimising the impact of new development on sites identified as internationally important for nature conservation 'Justification for minimising and mitigating the impact of new development should not only consider designated sites but include reference to conserving and enhancing the landscape and characteristic features of the Deben Estuary, valuing the landscape of the Felixstowe Peninsula as seen from the river, ensuring that new build is sensitive to the estuary topography and lessening light pollution in areas where lights will be visible from across a wide estuary area. (The quality of the landscape, the biodiversity and 'peace and tranquillity' of the estuary environment are recognised as one of the main reasons visitors choose to stay in the area.)

7.02 Reference to importance of high quality agricultural land to the north of Felixstowe. The importance lies not so much in the grade of land but in the combination of light soils, mild climate and access to irrigation which allows early and late vegetable cropping - now of national importance.

7.03 Reference to mitigating the impact of future development - targeted mitigation measures are also noted in the Deben Estuary Plan. Disturbance of the hinterland feeding and roosting areas of the species listed in connection with SPA / RAMSAR designations - ie behind the intertidal estuary - may also require mitigation.

Page 84

Other issues

* The area covered by the Felixstowe Peninsula Area Action Plan includes a section of the Deben Estuary but no mention is made to the significant flood defence issues which apply to the mouth and lower reaches of the river. This could be addressed by referring to the Deben Estuary Plan.

Page 93

Saved policies

AP 191 Felixstowe: Houseboats at Felixstowe

- * The Deben Estuary Plan notes the character that houseboats bring to parts of the river but puts forward guidelines which aim to establish common criteria across the whole estuary.. At the moment policies cover Felixstowe / Melton / and Woodbridge but ignore houseboats at Martlesham Creek.
- * Under 'How these policy issues are now being dealt with' reference should be made to the endorsed Deben Estuary Plan.

Summary:

AP191 Felixstowe: Houseboats at Felixstowe

- * The Deben Estuary Plan notes the character that houseboats bring to parts of the river but puts forward guidelines which aim to establish common criteria across the whole estuary.. At the moment policies cover Felixstowe / Melton / and Woodbridge but ignore houseboats at Martlesham Creek.
- * Under 'How these policy issues are now being dealt with' reference should be made to the endorsed Deben Estuary Plan

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

C - 7106 - 3314 - Appendix 3: Tables of all sites considered - None

7106 Comment

Appendix 3: Tables of all sites considered Appendix 3: Tables of all sites considered

Respondent: Lorna Adamson [3314] Agent: N/A

Full Text:

Comments on the Felixstowe Peninsula Action Plan

FPAP 3.07 I welcome the aim to preserve as far as possible prime agricultural land for food production. FPAP 3.20 I welcome the statement that proposals for new residential development outside the physical limits boundaries will be strictly controlled in accordance with national planning policy and the strategy for the countryside as set out in Core Strategy policy SP29.

I welcome the statement that extending the boundaries further was considered inappropriate because this may lead to further development in locations which are not well related to the existing settlements, services and facilities and lead to new building encroaching into the countryside.

FPAP 3.26 to 3.38 Land north of Walton High Street I am concerned at the loss of prime grade 1 and 2 agricultural land with the proposals for this site when 3.07 states the aim to preserve to preserve prime agricultural land for food production. I am not clear what 'mitigation may offset the loss of greenfield land of Grade 1-2 Agricultural soil classification'. I am also concerned about the potential for very heavy traffic on the High Road opposite Felixstowe Academy. The High Road is the main route into Walton and Felixstowe used by many residents living in the Trimleys in order to avoid the Howlett Way sliproad onto the A14 with heavy lorries to the docks bearing down on local vehicles. There should be a transport assessment carried out on the implications for the High Road - particularly at peak times of the day.

FPAP 3.50 Site opposite the Hand in Hand pub in Trimley St Martin I would endorse the need for a transport assessment here too as 'access to this site must be onto High Road as this provides the most suitable access point for the development and would also require a transport assessment to be undertaken as part of any future application. In addition, there is 'the major negative environmental effect is due to loss of Grade 2 agricultural soils.' I should be interested to know what 'Scope exists to mitigate for this effect.'

FPAP Site 451c and 451d With my concerns about the implications of development for traffic congestion and danger for users on the High Road, I am very worried about the proposal for a minimum of 350 houses on this site. The SSAASP mentions only a transport assessment for Howlett Way. There is also the major negative environmental effect from the loss of Grade 2 agricultural soils and again I am unconvinced by the statement 'scope exists to mitigate for this effect'. There should at least by a transport assessment carried out on the implications for the High Road - particularly at peak times of the day.

The Old Poultry Farm - which the site 451c wraps around - is brownfield land and an eyesore. I cannot see anyone particularly wishing to live in houses which are built beside this derelict site.

FPAP Appendix 3

I welcome the decision to discount the sites in Trimley St Martin set out in this Appendix. However, I am very disappointed that sites 920, 928 and 726 have been left for consideration in 'The local plan review' when they so clearly in my view violate national planning policy and the strategy for the countryside as set out in Core Strategy policy SP29.

Summary:

I welcome the decision to discount the sites in Trimley St Martin set out in this Appendix. However, I am very disappointed that sites 920, 928 and 726 have been left for consideration in 'The local plan review' when they so clearly in my view violate national planning policy and the strategy for the countryside as set out in Core Strategy policy SP29.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

O - 7339 - 348 - Appendix 3: Tables of all sites considered - None

7339 Object

Appendix 3: Tables of all sites considered

Appendix 3: Tables of all sites considered

Respondent: Trinity College Cambridge [348] Agent: Bidwells (Mr Darren Cogman) [1138]

Full Text:

I write in response to the Preferred Options consultation, submitting representations on behalf of my client, Trinity College, Cambridge, in respect of site 3003 - Land at Great Street Farm, High Road, Trimley St.

Mary

Site 3003: Land at Great Street Farm, High Road, Trimley St. Mary

On behalf of Trinity College we are disappointed that the above site has not been supported as a Preferred Option for residential development. Extending to approximately 1.01 hectares, the site could provide approximately 35 dwellings subject to suitable masterplanning. As such, the site would make make a meaningful contribution towards the pressing need for new housing across the Peninsula allied with the Council's commitment to deliver a minimum of 1,760 new dwellings in Felixstowe, Walton and the Trimley villages during the plan period (2010 to 2027) of the adopted Core Strategy. It would also respond to the fact that the Core Strategy recognises that Felixstowe, Walton and the Trimley villages is by far the largest town within the District, and the most sustainable settlement within the District, notwithstanding that it suffers from significant in-commuting for work at the Port and elsewhere from other towns given the current imbalance of housing relative to employment.

The absolute need to boost housing supply in Felixstowe is demonstrated by the Council's commitment (as required by the Inspector who examined the Core Strategy) to pursue an early review of the Core Strategy's strategic policies (amongst them a minimum housing requirement of 7,900 dwellings) by 2015 to address objectively assessed housing needs (Policy SP2 - Housing Numbers and Distribution). As part of the evidence base to inform the Core Strategy, Oxford Economics were commissioned (2010) to determine housing need for the District, which was established to be 11,000 dwellings at that time. It is understood that

evidence gathering during 2015 indicates that the current full, objectively assessed district wide housing need could be higher still.

As such, current housing need is higher than the levels of growth currently being planned for, and more sites are likely to be required to come forward on the peninsular in the medium term, over and above those proposed for allocation via the AAP. It is, therefore, critical to make the best use of land for housing and prioritise the delivery of residential development.

Sustainability Appraisal

Section 19 of the Planning and Compulsory Purchase Act (2004) requires that local planning authorities carry out an appraisal of the sustainability of the proposals (Sustainability Appraisal) in each local development document, and prepare a report of these findings. Furthermore, this report should identify,

describe and evaluate the likely significant effects on the environment of implementing the plan, and the 'reasonable alternatives' taking into account the objectives and geographical scope of the plan (Section 12, The Environmental Assessment of Plans and Programmes Regulation 2004).

In essence the SA should be applied as an iterative process informing the development of the Local Plan document. In relation to the host site, the 'overall assessment' section of the SA reads:

"The site scores well in terms of major positive social effects due to its proximity to key services and the potential to reuse a vacant site. Relatively good provision of public transport and proximity to key services allow the site to potentially reduce the effects of traffic on the environment and to encourage efficient

patterns of movement in support of economic growth. The site has one major negative environmental effect due to the loss of Grade 2 agricultural soils. However, scope exists to mitigate this effect. Development would see a site previously discounted due to poor access being combined with a new site providing access for both".

Within the 'Conclusion' section of the SA only one significant negative effect is listed (soil resources), whilst four significant positive effects are listed.

In respect of the one significant negative effect it should be recognised that the majority of the greenfield land across the Peninsula is either Grade 1 or 2 agricultural land and therefore agricultural land will need to be released for residential development. Such a position has been adopted by the Council in its

consideration of a number of recent planning applications. In relation to the four significant positive effects the SA notes the sites proximity to health services and Trimley St. Mary Primary School, the opportunity to reuse a vacant site for much needed housing, the sites proximity to the Town, District Centre and Strategic

Employment Opportunities (Port of Felixstowe), and the sites proximity to Trimley train station and a number of bus routes.

Given the above appraisal of the site we remain confused as to why the site is not shortlisted as a 'Preferred Option in the current consultation. The site would be serviced from High Road via an existing and established access point, whilst High Road is subject to a 30mph speed limit. The necessary visibility splays can be adequately accommodated, whilst it is not encumbered by any Public Rights of Way.

Conclusion

Whilst the Local Planning Authority has undertaken a SA it is unclear whether 'reasonable alternatives' have been adequately considered in accordance with the Regulations.

The Great Street Farm site is shown to score well with significant positive effects far outscoring significant negative effects, and in this context it is suggested that the site should be considered as a 'Preferred Option' in the forthcoming (February 2016) Pre-Submission (soundness) consultation.

I would of course be pleased to discuss matters further with you in the interim at your earlier convenience.

Summary:

Site 3003: Extending to approximately 1.01 hectares, the site could provide approximately 35 dwellings subject to suitable masterplanning. As such, the site would make make a meaningful contribution towards the pressing need for

O - 7339 - 348 - Appendix 3: Tables of all sites considered - None

7339 Object

Appendix 3: Tables of all sites considered

Appendix 3: Tables of all sites considered

new housing across the Peninsula Whilst the Local Planning Authority has undertaken a SA it is unclear whether 'reasonable alternatives' have been adequately considered in accordance with the Regulations. The Great Street Farm site is shown to score well with significant positive effects far outscoring significant negative effects, and in this context it is suggested that the site should be considered as a 'Preferred Option'.

Change to Plan

Appear at exam?
Not Specified

Legal?
Not Specified

Sound? Not Specified **Duty to Cooperate?**Not Specified

Soundness Tests

None

O - 7234 - 3923 - Appendix 4: Bucklesham Inset Map - None

7234 Object

Appendix 4: Bucklesham Inset Map

Appendix 4: Bucklesham Inset Map

Respondent: Artisan Planning & Property Services Ltd (Mr Leslie Agent: N/A

Short) [3923]

Full Text: object to this in principle and to its detail in respect of Bucklesham village and that proposed designated red line area

around Street Farm in the Bucklesham Inset Map.

Previous submissions to the Council in respect of the availability of land at Street Farm for housing and for employment purposes have been assessed and discounted without dialogue. Moreover that assessment has been superficial, scant and conclusions reached on the basis of incorrect assumptions i.e. re means of access thereby denying the opportunity

for that particular land to be thoroughly assessed against other sites both within the village and in other

villages/settlements of the peninsula.

All of the full, detailed comments submitted to the Council at Issues and Options Stage in this Plan's preparation still

apply and will be relied upon at a subsequent stage.

Summary: Previous submissions to the Council in respect of land at Street Farm for housing and for employment purposes have

been assessed and discounted without dialogue. Moreover that assessment has been superficial, scant and

conclusions reached on the basis of incorrect assumptions i.e. means of access thereby denying the opportunity for that particular land to be thoroughly assessed against other sites both within the village and in other villages/settlements of the peninsula. All of the full, detailed comments submitted to the Council at Issues and Options Stage in this Plan's

preparation still apply and will be relied upon.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified None

C - 7287 - 3944 - Appendix 4: Bucklesham Inset Map - None

7287 Comment

Appendix 4: Bucklesham Inset Map

Appendix 4: Bucklesham Inset Map

Respondent: The Ravenshear Family [3944] Agent: Fletcher Barton Ltd (Mr William Barton) [3482]

Full Text:

We understand that at the time of the core strategy examination in public in 2013, the best available evidence of Objectively Assessed Need (OAN) was 11,000 new homes and this is considered to have increased since then. However on page 17 section 3.01 it states that at least 7,900 homes are to be provided. Bearing in mind this has now increased by over 3,000, we do not believe enough sites have been allocated.

Page 19 preferred policy FPP1 does not show any housing allocation for Bucklesham for the period 2015-2027. We would suggest that a minimum of 8 units are allocated to Bucklesham in line with previous contributions and housing distribution generally within the Felixstowe Peninsula.

Page 20 paragraph 3.16 would appear to conflict with paragraph 2.06 on page 14 and we suggest that paragraph 3.16 is amended to make it clear that in fulfilling local need and therefore housing numbers in the district, physical limit boundaries should be capable of being amended to include the allocated development.

Furthermore the restriction on development outside physical limits boundaries further highlights the problems identified above regarding shortage of allocated sites. In the example of Bucklesham there are very limited options for development within the existing settlement. As planning policies should be based on the most up to date evidence it is illogical to prevent development outside the current limits when it is inevitable that more land will be needed. Policy FPP2 sets an unnecessary policy obstacle to development that cannot be considered to be positively prepared given the lack of up to date evidence on housing need.

Appendix 4, insert map for Bucklesham, should be amended to show site 914 as previously put forward as part of the SHLAA process. The so called negative effects against the site should be addressed at planning application stage. Additionally to allow a small scale development and to reflect the poorer quality area of land from a landscape point of view being the area adjacent to the road and around the sewage works, we would suggest the special landscape area is amended as annotated on the enclosed plan. It should be noted that additional land could be made available to provide landscape features to mitigate the development on the adjoining land. The site and additional land is shown edged blue on the plan as attached.

Summary:

insert map for Bucklesham, should be amended to show site 914 as previously put forward as part of the SHLAA process. The so called negative effects against the site should be addressed at planning application stage. Additionally to allow a small scale development and to reflect the poorer quality area of land from a landscape point of view being the area adjacent to the road and around the sewage works, we would suggest the special landscape area is amended as annotated on the enclosed plan. The site and additional land is shown edged blue on the plan as attached.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Preferred Options Bucklesham Map.pdf

S - 6851 - 3828 - Appendix 5: Kirton Inset Map - None

6851 Support

Appendix 5: Kirton Inset Map

Appendix 5: Kirton Inset Map

Respondent: Margaret Condick [3828] Agent: N/A

Full Text: This seems to me an appropriate place to build new houses. It would fill in a gap, and help link the houses at the far

end of Bucklesham Road with the rest of the vilage. It would be good if most of the houses could be affordable/starter

homes, as that is what our village needs. I would welcome young families to our community.

Summary: This seems to me an appropriate place to build new houses. It would fill in a gap, and help link the houses at the far

end of Bucklesham Road with the rest of the vllage. It would be good if most of the houses could be affordable/starter

homes, as that is what our village needs. I would welcome young families to our community.

Change to Plan N/A

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified N/A

C - 6974 - 2564 - Appendix 5: Kirton Inset Map - None

6974 Comment

Appendix 5: Kirton Inset Map

Appendix 5: Kirton Inset Map

Respondent: Kirton and Falkenham Parish Council (Mr Colin Agent: N/A

Shaw) [2564]

Full Text: Parish Council response to the SCDC FPAAP Preferred Options document public consultation

24th November 2015

1. Housing

A. Village capacity

Page 19. Preferred Policy FPP1 Housing. Kirton and Falkenham.

This table is confusing; it states the indicative requirement for 1/4/2015 to 31/3/2027, but does not take into account the actual approved figures; namely the 43 houses of the Taylor Wimpey development. The note of paragraph 3.10 does address this, but is easily missed if the table is read in isolation, as it will be. There should be a reference in the table to paragraph 3.10 and this paragraph should be quantitative rather than stating that the table gives minimum figures; namely that the approved applications 1/4/2015 to 31/3/2027 gives a total 50 for Kirton, which is 19% more than the Total Planned.

B. Site 325a

Page 37. Land at Bucklesham Road, Kirton, 325a. Also table on Page 99.

This site should be removed from this list of preferred options for the following reasons:

- a) Without this site, Kirton is already providing 50 houses, 8 more than the FPAAP requires, which is 19% above the 'minimum' figure. Therefore this site is not necessary.
- b) SCDC's sustainability analysis is overall negative for Social Effects, overall negative for Environmental Effects and slightly positive for Economic Effects. This gives an aggregate of negative sustainability, whilst every other preferred options site is assessed as positive sustainability. We note that SCDC does state that 325a scores poorly for environmental effects and that it is unlikely that these can be mitigated. Site 325a is the only unsustainable site in the list of preferred options and so should be removed. The Parish Council's previous recommendations for sustainability scores (attached at the back) [see attached document] have not been incorporated; these would give an even more negative score
- c) Residents have raised valid concerns about the access visibility to the road and also the danger and frequent jams due to large agricultural vehicles and buses negotiating the narrow road with tight bends, unable to pass each other. Before this site is further considered SCDC should ask SCC Highways to hold a site visit at an advertised date and time, so that interested parties can express their concerns.
- d) Residents have also highlighted the effect on the environment; wildlife, trees and the Special Landscape Area, including this site. If this site is developed, then the entire village will lose the visual amenity of this Special Landscape Area. The Parish Council have already responded at SCDC's request to SCDC's Sustainability Analysis (attached at the back) [see attached document]; however many of our comments have not been incorporated in the Preferred Options. For example, the Parish Council advised that "To conserve and enhance the quality and local distinctiveness of landscapes and townscapes" should be marked "--" as opposed to SCDC's marking of "-/?".
- e) The pavement is insufficiently wide for pushchair and mobility scooters.
- f) At some point SCDC changed the indicative capacity from 7 to 15. Again this is an increase in housing beyond the capacity of the village's services and transport.
- C. Kirton should not be developed further unless local services and transport improve.
- a) The Parish Council has repeatedly stated that the current lack of services and transport in the village make it unsuitable to be developed as a dormitory, by further home building. To do so would impact greatly on the environment and quality of life of residents. The FPAAP's sustainability analysis makes clear that sites near centres of services and transport, such as Felixstowe and the Trimleys, score much higher on sustainability. Homes should be built near work places and retail, healthcare and transport facilities.
- b) As an example; those attending the Suffolk One Sixth Form College currently have to walk from Kirton to Trimley St. Martin to catch a bus to the school. Surely new housing should be located near services?
- c) There is particular concern that the housing increase in Kirton and Trimley St. Martin will put pressure on school capacity in the short and medium term; there has been no school capacity plan communicated which aligns with the site proposals. Further increase in the size of Trimley St. Martin School will cause deterioration of a currently severe traffic and parking problem at the school.
- d) As mentioned in the draft document, Anglia water will need to enhance the sewerage capacity if significant numbers of additional houses are built. This must be done as part of an end to end design, to ensure that problems are not created further up or downstream.

D. Bungalow Policy

SCDC have advised the Parish Council that SCDC cannot insist that bungalows are included in any future development, unless this is included as a policy in the FPAAP. The view of the village is that any future development should include bungalows.

Therefore, without in any way compromising the views above (that the village's lack of services and transport means that any further development is inappropriate), the FPAAP should include a statement that any future development in the village, which would be against the majority of parishioners' wishes and the Parish Council's advice, should include bungalows.

2. Physical Planning Boundary

C - 6974 - 2564 - Appendix 5: Kirton Inset Map - None

6974 Comment

Appendix 5: Kirton Inset Map

Appendix 5: Kirton Inset Map

Page 115. Appendix 5 Kirton Inset Map

Replace inset map with the originally proposed new village envelope - see below [see attached document]; reviewed and agreed at public meeting with 250 parishioners, the Parish Council and representative from SCDC. Remove all proposed sites including 325a in the latest version, except for 712 which has already been approved.

3. Areas to be protected from development.

To include in the protected area of Falkenham the curtilage/area surrounding The Old Vicarage and The New House. This area has boundaries with the ANOB, the Church/Churchyard, open countryside and the curtilage of listed buildings. The area was previously protected from development as it was outside the village envelope and protection would put it in the same category as similar areas in Kirton and Bucklesham.

Being in a classification of Other Village or Open Countryside does not give protection from future development.

Summary:

Page 115. Appendix 5 Kirton Inset Map

Replace inset map with the originally proposed new village envelope [see attached document]; reviewed and agreed at public meeting with 250 parishioners, the Parish Council and representative from SCDC. Remove all proposed sites including 325a in the latest version, except for 712 which has already been approved.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

parpl2015fpaapPCresp.pdf

C - 6778 - 3060 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

6778 Comment

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Respondent: Felixstowe Town Council (Mr Ash Tadjrishi) [3060] Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Preferred Options Consultation

Thank you for the opportunity to respond to the Suffolk Coastal District Council Felixstowe Peninsula Area Action Plan Preferred Options paper. The Town Council considered this matter at its meeting of 11 November 2015.

Felixstowe Town Council was pleased to welcome and endorse the Felixstowe Peninsula Area Action Plan Preferred Options, subject to the following comments:

Page 13, Para. 2.02

We recommend adding the following to the end of the final sentence of this paragraph: ", as required by the July 2013 Local Plan."

Page 24, FPP3

Remove "(for residents and visitors)" from the bottom bullet relating to appropriate parking provision.

Page 26, Para. 3.30

This paragraph has been reduced in scope from an earlier draft and no longer references the unique location this site holds as a gateway to Felixstowe. It is vital that the policy ensures that any proposals for development of this site include appropriate consideration for this gateway and the statement this makes to those arriving to Felixstowe by road.

Page 27, FPP4

Remove "and Candlet Road" from the first bullet point. Any business units for this site should be restricted to the land adjacent to the A14 Dock Spur only.

Page 27, Title of 3.39

The title should read "Land" rather than "Lane" and include Swallow Close.

Page 29, FPP5

Please include Swallow Close and refer to this site as the "Land north of Conway Close and Swallow Close" throughout.

Page 49, Para. 5.06

Given the latest available information on these sites, this paragraph should be removed.

Page 50, Inset Map

The secondary shopping frontage should continue along Bent Hill on both sides of the road. It should also include the frontage of Trinity Methodist Church on Hamilton Road for consistency. Likewise the primary shopping area shaded in green should include this same section.

Page 51, Para. 5.10

Sentence should end "other than town centre uses".

Page 51, Para. 5.12

Please amend the final two sentences to read as follows:

"The scheme was not completed between Orwell Road and Bent Hill and the AAP will seek to encourage the continuation of the Shared Space along Hamilton Road. The completion of this scheme within the town centre boundary will provide a continuous link between Hamilton Road and Bent Hill and reinforce the connections between the town centre and the sea front."

Page 54, FPP15

Please amend the first paragraph to read "Any change of use proposals in this area should seek to retain a high proportion of retail activity."

Page 68, FPP21

Correction: "The provision of beach huts will be limited to those which currently exist. Any increased provision will be directed towards other parts of the sea front (namely Felixstowe Ferry Golf Club to Cobbolds Point Preferred Policy FPP19) as appropriate."

Page 74, FPP24

The policy should open with the following opening sentence:

"The need to strengthen Felixstowe as a seaside destination is recognised."

The next sentence should read: "Holiday accommodation will be encouraged and supported"

Page 82, FP27

This should be titled FPP27 rather than FP27.

C - 6778 - 3060 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

6778 Comment

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Please revise the first line of text to read "Spa Gardens and Town Hall Gardens".

Appendix 7:Felixstowe, Trimley St. Mary & Trimley St. Martin Inset Map.

The Physical Limits boundary in regard to the seaward boundary should be drawn or

The Physical Limits boundary in regard to the seaward boundary should be drawn as in the 2001 Local Plan map - i.e disappear in to the sea rather than be drawn along the low water mark.

The dotted blue line denoting Proposed Tourism Areas is misleading and these areas should be marked out to define the landward extent and total area covered by those corresponding policies. Landguard peninsula should also be encapsulated whereas the line appears to end at Landguard point. As above, the lines between the areas should simply stop at the sea. The extensions of those lines into the sea can be wrongly interpreted as representing a policy as applying to an element of the sea.

The port area should be included within the Physical Limits boundary as is the case in the 2001 Local Plan map. The Physical Limits boundary in the Manor End area should include the caravan parks and Custom House, terminating at the boundary of Landguard Common.

The colouring of some of the designations on the main map are confusingly similar, notably those for the Proposed District Centre, the District Centre boundary and the revised Physical Limits boundary. Also, the use of very heavy lines at the scale of the main map is unhelpful.

Notwithstanding these observations, thank you for the opportunity to have been consulted. The Town Council looks forward to receiving information on the further development of the Area Action Plan.

Summary:

The Physical Limits boundary in regard to the seaward boundary should be drawn as in the 2001 Local Plan map - i.e disappear in to the sea rather than be drawn along the low water mark.

The colouring of some of the designations on the main map are confusingly similar, notably those for the Proposed District Centre, the District Centre boundary and the revised Physical Limits boundary. Also, the use of very heavy lines at the scale of the main map is unhelpful.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot Specified

Attachments:

AAP Preferred Options Consultation Response.pdf

C - 6788 - 2549 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

6788 Comment

Appendix 7: Felixstowe, Trimley St Mary & Trimley St

Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St

Martin Inset Map

N/A Respondent: Mrs Judith Hedges [2549] Agent:

Full Text: Here are my comments on:-

Felixstowe Peninsula Area Action Plan Preferred Options

I object to building on the land to the north of Conway Close because

- 1. Gulpher Road and the eastern leg of Ferry Road are Felixstowe's only quiet country lanes enjoyed by walkers, cyclists, horseriders and sight seeing cars for those not able to be active. To build on this site would increase the traffic flow such this would no longer be possible.
- 2. There is already severe congestion at the Ferry Rd entrance to Kingsfleet School at arrival and departure times. This would increase to an intolerable level with more housing.
- 3. Gulpher Road is too narrow to handle extra traffic from new housing on this site.
- 4 At present there is a very pleasant countryside footpath walk through The Grove, into Hyems Lane, across the field north of Conway Close, across the field by the Ferry Rd allotments to the pill box and then a short walk down the quieter section of Ferry Rd to the coast at the Golf Club. If the field north of Conway Close is developed and even if a right of way is preserved this walk will then be partly on a hard surfaced urban pathway and loose its attraction. Felixstowe has very few countryside footpath walks it is essential they are maintained. To walk along our footpaths is a superb experience. The views and countryside sights and smells are pure escapism and at present they are on our doorstep, It is our duty to keep them available for future generations.

Paragraph 7.02

I object to the last sentence of this paragraph. It should state that the high quality agriculture land and countryside north of Felixstowe IS to be protected. It should not say 'where possible'. We are custodians of our environment, town and countryside, for future generations and as such we must plan with them in mind not just for our needs for the next couple of decades. The area between the red district centre boundary and the length of Gulpher Road and the eastern leg of Ferry Road(nth of allotments) needs to be included in the area that needs to be protected from development. This may mean that the red district centre boundary needs to be moved to Gulpher Road so that the protected area is

It is essential that high quality agricultural land is preserved to help our country be self supporting as much as possible. Preserving agricultural land is also essential for our wellbeing. We have evolved to live off the land and in touch with the land. To continue with urbanisation of our environment will prove to be disastrous for our well being and expensive for society. In Felixstowe we are far more fortunate than people in many, many other towns and cities but that does not mean we should start loosing our countryside in the way they have lost their countryside. The Green Belt is essential for all and should be sacrosanct. We seem to pay more attention to countries loosing their big mammals than us loosing our small mammals. We have already lost our big mammals and birds. We must now look to keeping linked countryside areas for our fast disappearing stoats, weasels, hedgehogs, badgers, owls, greenfinches and our meadow and woodland wildflowers and native trees. Two facts amaze me, 1. I have never seen a tree sparrow and 2. you can count on one hand how many black poplar trees survive in our locality. It will be a sad day when future generations only see an owl or a hedgehog in a nature book

Paragraph 7.06

We are indeed short of woodland.

An area needs to be marked on the plan for woodland development in the same way as areas are marked out for housing, retail etc. If left to be considered as part of housing development plans then no substantial or connected woodlands will appear. Woodlands need to be connected to offer large enough territories for wildlife to thrive. In Felixstowe we are fortunate in having The Grove and Abbey Grove on our doorstep. Both woodlands are open to the public 24/7. These woods are cared for by volunteers under SCDC and the Woodland Trust respectively to provide a mixture of wildlife habitats combined with providing beautiful areas for the public to enjoy. Both these areas are small, too small for many small mammals to thrive. If the land connecting and between these two woodlands was converted to woodland then Felixstowe would have a woodland to be proud of, for people to enjoy and for wildlife to thrive and multiply. May be this land could be purchased between the community, Woodland Trust and developers in the town. Appendix 7

The area between the red district centre boundary and the length of Gulpher Road and the eastern leg of Ferry Road(nth of allotments) needs to be included in the area that needs to be protected from development. This may mean that the red district centre boundary needs to be moved to Gulpher Road so that the protected area is included. We are custodians of our environment, town and countryside, for future generations and as such we must plan with them in mind not just for our needs for the next couple of decades. They must be allowed to enjoy the environment that we have enjoyed. It is essential that high quality agricultural land is preserved to help our country be self supporting as much as possible. Preserving agricultural land is also essential for our wellbeing. We have evolved to live off the land and in touch with the land. To continue with urbanisation of our environment will prove to be disastrous for our well being and expensive for society. In Felixstowe we are far more fortunate than people in many, many other towns and cities but that does not mean we should start loosing our countryside in the way they have lost their countryside. The Green Belt is essential for all and should be sacrosanct. We seem to pay more attention to countries loosing their big mammals than us loosing our small mammals. We have already lost our big mammals and birds. We must now look to keeping linked countryside areas for our fast disappearing stoats, weasels, hedgehogs, badgers, owls, greenfinches and our meadow and woodland wildflowers and native trees. Two facts amaze me, 1. I have never seen a tree sparrow and 2. you can count on one hand how many black poplar trees survive in our locality. It will be a sad day when future generations only see an owl or a hedgehog in a nature book.

Many thanks for all your work on this plan

C - 6788 - 2549 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

6788 Comment

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St

Martin Inset Map

Summary:

The area between the red boundary and the length of Gulpher Road and the eastern leg of Ferry Road(nth of allotments) needs to be included in the area to be protected from development. This may mean that the red boundary

needs to be moved to Gulpher Road so that the protected area is included.

We are custodians of our environment, town and countryside, for future generations; as such we must plan with them in mind not just for our needs for the next couple of decades. They must be allowed to enjoy the environment that we have

Change to Plan

Appear at exam? Not Specified

Legal? Not Specified

Sound? Not Specified

Duty to Cooperate? Not Specified

Soundness Tests

None

Attachments:

O - 7014 - 2980 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

7014 Object

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Respondent: Christchurch Property Company Limited [2980] Agent: Richard Brown MSc (Mr Richard Brown) [3387]

Full Text: 1. INTRODUCTION

- 1.1 Christchurch Land and Estates (Felixstowe) Limited (hereinafter referred to as "Christchurch") are the promoters of the land at Candlet Road Felixstowe (hereinafter referred to as "the site") edged red on the plan attached as Annexure
- 1.2 It is confirmed in paragraph 4.28 of the adopted Local Plan (July 2013) with our emphasis added that
- "4.28 Felixstowe with Walton is by far the largest town within the District and includes the port of Felixstowe, a strategic employment site, being of both regional and national significance....."
- 1.3 With regard to the site at Candlet Road therefore being an urban extension to the "largest town within the District", the site is considered to be a highly sustainable location for residential development, and should therefore be allocated for residential development.
- 1.4 Christchurch consider that the Council, in the emerging AAP document are not addressing the full objective assessment of housing need (FOAN) for the District, which contention is supported by the Pegasus Group Report (February 2015) which was attached as Annexure 2 to the Submissions made previously in February earlier this year.

In paragraph 3.2 of the Pegasus Report, they confirmed

"The Inspector who carried out the examination into the Core Strategy crucially highlighted that the East of England Forecasting Mode (EEFM) which informed the Council's Housing Topic Paper evidence base identified a need for 11,000 extra dwellings over the plan period.

The Local Authority position is that this figure is the FOAN but that the core strategy (plan) should not provide for this scale of development at the stage of adoption. The Inspector agreed but endorsed the position to have an early review of the Core Strategy to achieve a fully plan-led approach to new development considering a FOAN of 11,000 dwellings 2010 to 2027.

- 1.5 Paragraph 182 of the National Planning Policy Framework considers that for a plan to be considered "sound" it should be "positively prepared", that the plan should meet objectively assessed development requirements. The AAP, therefore, in not addressing the FOAN of 11,000 dwellings for the district, it is submitted, is not "positively prepared".
- 1.6 The growth of Felixstowe (dispersed), as in the AAP document, is not considered the most appropriate strategy for the future development needs in the Peninsular, as there is no proper or sufficient analysis to lead to the conclusion that the land at Candlet Road (abutting the Felixstowe settlement boundary) should not be allocated for residential development.
- 1.7 Paragraph 182 of the Framework confirms that for a plan to be considered "sound" that it should be "justified", that the plan "should be the most appropriate strategy" where the AAP dispersed pattern of development is not the most appropriate strategy nor is "consistent with national policy" (paragraph 52).
- 1.8 The Submissions made by Christchurch earlier this year also contained a detailed response to the Strategic Housing Land Availability Assessment (SHLAA) (31st March 2014) and the corresponding consideration of site suitability in the emerging Plan.
- 1.9 The sustainability credentials of the Candlet Road site were also further considered by the Turley Sustainability Appraisal (February 2015) attached as Annexure 3 in the Submissions made by Christchurch earlier this year.
- 1.10 The site has not been allocated in the AAP, therefore in terms of the emerging Plan, the site is an "omission site".
- 1.11 The Council has failed to properly assess appropriate alternative sites in their Interim Sustainability Appraisal to ensure that the most sustainable sites come forward. The plan is, therefore, not "justified.

2. FULL OBJECTIVELY ASSESSED HOUSING NEED

- 2.1 It is considered that the Council cannot demonstrate a 5 year supply of housing in accordance with the requirements of the Framework.
- 2.2 The Inspector examining the Suffolk Coastal Core Strategy concluded in his final Report (June 2013) that the scale of housing provision (2010 to 2027) of 7,900 dwellings (465 per annum), fell substantially short of the full, objectively assessed need (OAN) at that time. As such, the Core Strategy was only adopted on the basis that an early review would be undertaken, as set out in Policy SP2 itself, which will commence with the publication of an Issues and Options

O - 7014 - 2980 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

7014 Object

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Report by 2015 at the latest.

- 2.3 In view of the need for an early review of the Core Strategy to establish the full OAN for the District and address the housing requirement accordingly, it is relevant given the timescales in the determination of this appeal to assess the full, up-to-date OAN for housing in Suffolk Coastal District in accordance with the policy set out in the Framework and the guidance in Planning Practice Guidance (PPG).
- 2.4 With the Council not commencing the review of the Core Strategy, including by publishing evidence as to the full OAN for housing in the District, it must be the case that Policy SP2 and the housing provision of 7,900 dwellings 2010 to 2027 will become out-of-date at the end of 2015.
- 2.5 Christchurch will also refer to the recent decision of the Inspector in an appeal decision at Saxmundham (APP/J3530/A/14/2221769) (July 2015), where he considered the correct method of determining the five year housing land supply in Suffolk Coastal. He determined that the correct method of dealing with shortfall in the delivery of housing to date was the use of the 'Sedgefield' approach which seeks to make up the under supply from the start of the plan period in the five year housing requirement.

In addition, and contrary to the Council's latest five year supply of housing position statement as at March 2015 (issued in June 2015), with regards to the percentage buffer to be applied to the five year requirement the Inspector found that a 20% buffer should be applied in Suffolk Coastal given that there have been 6 consecutive years of past under delivery.

- 2.6 It was agreed between both parties in the Saxmundham appeal that, at that time and for the purposes of that appeal, the housing requirement in the Core Strategy be used in the determination of the five years supply of housing land. Against the Core Strategy housing requirement and in light of his findings as to the correct method of dealing with past undersupply and the application of a buffer of 20%, the Inspector found there to be a 3.2 years housing land supply in Suffolk Coastal.
- 2.7 The Council have not made progress with an early review of the Core Strategy, the housing provision figure in Policy SP2 will be out-of-date. There will therefore be a need for the Inspector to come to a judgment as to what the full, OAN for housing in the District is for the purposes of the emerging Plan.

3. THE EMERGING STRATEGY

- 3.1 The growth of Felixstowe, as promoted in the AAP, is not considered the most appropriate strategy for the future development needs in the Peninsular, as there is no proper or sufficient analysis to lead to the conclusion that the land at Candlet Road (abutting the Felixstowe settlement boundary) should not be allocated for residential development.
- 3.2 The land at Candlet Road should be allocated as it will assist with meeting an identified housing need and deliver sustainable development.
- 3.3 The adopted Local Plan (July 2013) confirms at paragraph 4.28
- "4.28 Felixstowe with Walton is by far the largest town within the District and includes the port of Felixstowe, a strategic employment site, being of both regional and national significance....."
- 3.4 Paragraph 4.31 of the adopted Local Plan confirms
- "4.31 The growth of jobs in Felixstowe, driven by expansion of the Port, means that employment is now out of balance with the availability of housing. As a result, more of the new jobs are being taken up by people who are not able to find a home in Felixstowe, even if they would like one...."
- 3.5 It is, therefore, considered that the site at Candlet Road Felixstowe is in a position to "redress" this imbalance identified at paragraph 4.31 of the adopted Local Plan.
- 3.6 It is, further acknowledged, at paragraph 4.35 of the adopted Local Plan that
- "4.35 Longer term, it is likely that additional housing will need to be provided......"
- 3.7 Strategic Policy SP21 of the adopted Local Plan confirms with our emphasis added
- "The strategy for Felixstowe will be to reverse the recent trends towards a population in balance, threats to local services and a decline in the fortunes of the town in order to enable it to fulfil its role as a major centre......"
- "Additional housing will be created. In the short to medium term, this will represent organic and evolutionary growth in the Felixstowe and Trimleys area over a mixture of sites immediately abutting existing built up areas......"
- 3.8 Whilst adopted Local Plan policy SP21 confirms a "strategy for a dispersed pattern of future development" it is submitted that a dispersed pattern is acting against the promotion of sustainable development as confirmed in

O - 7014 - 2980 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

7014 Object

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

paragraph 14 of the National Planning Policy Framework

14. At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

For plan-making this means that:

- local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted.

For decision-taking this means:

- · approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted."
- 3.9 Also, a dispersed pattern of development is contrary to the aims and objectives of paragraph 52 of the Framework, therefore, the Plan is not "consistent" with national policy.
- "52. The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities....."
- 3.10 Policies SP1 and SP1A of the adopted Local Plan seek the achievement of sustainable development.
- 3.11 With regard to Felixstowe, the 2013 Local Plan confirms:
- "4.28 Felixstowe with Walton is by far the largest town within the district and includes the Port of Felixstowe, a strategic employment site, being of both regional and national significance....." (with emphasis added).
- "4.29 Felixstowe has more people of retirement age and fewer people of working age than the norm, either in the rest of Suffolk or across the UK....."
- "Younger generations already have to look outside Felixstowe for careers and housing" (with emphasis added).
- "4.30 The population of Felixstowe is increasing slowly although household size is falling. Despite slow population growth there are, therefore, even more people looking for homes, and Felixstowe has more small households single people or couples particularly those that are key workers or first time buyers. The number and type of new homes provided in the town over recent years has not matched this increase in demand".
- "4.31 The growth of jobs in Felixstowe, driven by expansion of the Port, means that employment is now out of balance with the availability of housing. As a result, more of the new jobs are being taken up by people who are not able to find a home in Felixstowe, even if they would like one......" (with emphasis added).
- 3.12 Christchurch on the 27th February 2015 made Submissions to the then emerging Site Allocations and Area Specific Policies and the Felixstowe Peninsula Area Action Plan, relating to the site. In particular, section Five of the Submissions responded to the SHLAA "identifying" the site as being

"Poorly related to existing settlement"

3.13 The February Submissions also confirmed significantly that previously a Report on this matter was presented to the Local Development Framework Task Group on the 4th August 2008 (LPTG11/08). The Council's consideration of the ("option 4") land north of Candlet Road Felixstowe stated:

"on the whole option 4 has significant merit. It represents a good sustainable option that benefits from existing formal and informal recreational areas to the east as well as access to the town centre. It is also the closest area to the town centre and development might also ensure a stronger and more viable town centre given the increased usage of facilities there...the landscape, particularly the western part, is the least sensitive of all of the option and the existing

O - 7014 - 2980 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

7014 Object

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

wildlife corridor in the east can be built upon as part of a strategy of enhancing green infrastructure".

- 3.14 The 2008 Council Report confirms Christchurch's contention that the site is a highly sustainable location for growth, being immediately adjacent to the settlement boundary and close to a range of services and facilities within walking and cycling distance, therefore should be an allocated site.
- 3.15 The site is not a preferred allocation for residential development despite Core Strategy Policy SP21 confirming that (with our emphasis added)

"additional housing will be created"

"over a mixture of sites immediately abutting existing built up areas" and to

"create a more sustainable balance between housing and employment thereby providing an opportunity to reduce commuting"

- 3.16 Paragraph 4.31 of the adopted 2013 Local Plan confirms:
- "4.31 The growth of jobs in Felixstowe, driven by expansion of the Port, means that employment is now out of balance with the availability of housing. As a result, more of the new jobs are being taken up by people who are not able to find a home in Felixstowe, even if they would like one.

The 2001 Census revealed that there was a daily net inflow to Felixstowe of 2,719 workers. This comprised an outflow of 3,600 Felixstowe residents to jobs in Ipswich and elsewhere and an inflow of 6,319 who work in Felixstowe but live elsewhere".

- 3.17 The site abuts the urban area of Felixstowe, therefore is considered to be compliant with the aims and objectives of adopted Local Plan where Policy SP21 to create additional housing to address the "imbalance" set out in paragraph 4.31 (above) and constituting "organic and evolutionary growth".
- 3.18 Whilst adopted Policy SP21 confirms a

"strategy for a dispersed pattern of future development"

which is continued in the emerging Development Plan (the site is not identified as a preferred allocation) it is considered that a "dispersed pattern" is not the most sustainable growth option for Felixstowe, and is also not compliant with paragraph 52 of the Framework.

- "52. The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development. In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoining any such new development".
- 3.19 The Council confirm on page 98 of the AAP that the appeal proposals are a "discounted site" confirming that (DC/15/1128 OUT)

"Planning application refused 12.06.2015"

and on page 109 they identify a number of "constraints"

- * Flood zones 2 and 3 in NE corner of site
- * Area which may be of archaeological interest
- * BAP species (including badgers) have been recorded on site
- * Sites and monuments: Cowpasture Farm
- 3.20 In response, the proposals for the site
- (i) do not include development in the very small area identified within the flood plain,
- (ii) the archaeological "interest" in the site (would apply to all Preferred Options sites) can be the subject of planning conditions,
- (iii) the planning application reference DC/1/1128/OUT was supported by ecology Reports that confirmed no adverse impacts on any wildlife or protected species
- (iv) regarding 'Sites and monuments: Cowpasture Farm', as detailed on page 109 of the AAP, some of the Historic Environment Record (HER) entries, formerly known as Sites and Monuments Records (SMR) are recorded as 'Cowpasture Farm' in the site detail, including:

O - 7014 - 2980 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

7014 Object

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

- * HER entry MSF2946: detailed as Cowpasture Farm scatter of pottery and findspot
- * HER entry MSF2992: detailed as field system including a number of rectangular field boundaries, Cowpasture Farm (this is from cropmark evidence recorded to the west and at the western edge)
- * HER entry MXS22480: detailed as possible WWII anti-tank ditch visible from cropmark evidences, immediate west of Cowpasture Farm

The HER entries within a 2km radius of Land to the North of Candlet Road are detailed in Appendix two of the Archaeological Desk-based Assessment (DBA) prepared in February 2015. The location of the above HER entries and other HER entries referred to as Cowpasture Farm are illustrated and detailed in Appendix two.

- 3.21 Cowpasture Farm has merely been used as a place name/reference point within the HER. There is no specific entry on the HER for Cowpasture Farm or the buildings comprising the farmyard. Notably, Cowpasture Farm is not included on the National Heritage List for England (NHLE) as shown on the enclosed extract.
- 3.22 The AAP is supported by an Interim Sustainability Appraisal Report which (Table 1 page 4) sets out the sustainability "objectives". Twenty three such "objectives" are identified by the Council against which criteria it is considered that the proposals (insofar as they are relevant to urban extensions) are fully compliant.
- 4. RESPONSE TO THE STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT ("SHLAA") (SITE SUITABILITY)
- 4.1 It is noted that the SHLAA identifies, within Appendix D, that the Local Planning Authority has assessed some 71.20 hectares of land to the North of Candlet Road, Felixstowe. This assessment concludes that the land is

'poorly related to [sic] existing settlement'.

- 4.2 This statement is made in the complete absence of any concept or more detailed Masterplan.
- 4.3 Christchurch wish to rebut this conclusion.
- 4.4 Christchurch have an interest in approximately 31 hectares of land to the North of Candlet Road. This is only some 43% of the total site area assessed by the SHLAA and is thus materially different to the overall land assembly considered as part of the SHLAA.
- 4.5 Notwithstanding this point, the site (as part of the larger land assembly) has previously been considered by the Local Planning Authority and with particular regard to the 'Core Strategy Proposed location of strategic housing growth in Felixstowe and the Trimley villages'.
- 4.6 As confirmed previously a report on this matter was presented to the Local Development Framework Task Group on 4th August 2008 (LPTG 11/08). A copy of the Report is attached as Annexure 2 to these Submissions.
- 4.7 The site formed one part of a number of recommendations as to which sites should be the preference to the Council for the location of housing growth, indicating a preference toward larger developments, with related infrastructure incorporated into those schemes.
- 4.8 Appendix 1 to LPTG 11/08 provided some background in reaching that conclusion. Within this Appendix, it is stated that the landscape

'is not particularly attractive. It is, however, visible from a number of locations. Most are close distance and with the introduction of mitigation planting are not significant. The exception will be from the east where the close proximity viewpoints are in elevated locations and the topography would still allow views in to the area'.

4.9 The Appendix also states that

'the landscape in the part of the area to the east of Gulpher Road is more sensitive and shows a lower capacity to absorb development than the west. It also already has some recreational/green infrastructure value. In an area of current and predicted deficiencies of accessible natural greenspace, this part of area 4 may provide opportunities to address this'.

- 4.10 The proposals for the site, therefore, offer an opportunity for the successful integration of open space as part of the layout. This would be to the benefit of future residents, but also to the surrounding area by facilitating strong links to existing urban areas to the south and into the broader network of footpaths and other routes to the north.
- 4.11 The proposals bring about an access onto Candlet Road, giving a direct road link to the employment centre of the port, without encroachment onto existing communities. There is also direct access to the town centre without compromising existing road networks. Also, as referenced above, the proposals will enable greater integration of footpath networks and access to leisure facilities.

O - 7014 - 2980 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

7014 Object

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

4.12 Whilst only referenced in the Executive Summary to the Appendix, the report states that the site is

'separated from Felixstowe by the single carriageways of Candlet Road, but has Gulpher Road passing beneath it and the ability for crossings to be created. Development would be close to the town centre. Road access to the Port is easy although sustainable means of travel by cycle or on foot could need to be created'.

4.13 The Council's summary of this land assembly has the foresight to acknowledge that

'on the whole option 4 has significant merit. It represents a good sustainable option that benefits from existing formal and informal recreational areas to the east as well as access to the town centre. It is also the closest area to the town centre and development might also ensure a stronger and more viable town centre given the increased usage of facilities there...the landscape, particularly the western part, is the least sensitive of all of the option and the existing wildlife corridor in the east can be built upon as part of a strategy of enhancing green infrastructure'.

- 4.14 In summary, it is considered that the appraisal and then inception of the Masterplan has clearly demonstrated that the development of the land to the North of Candlet Road is not poorly related to the existing settlement, but can form an integrated part of the settlement.
- 4.15 The conclusion of the SHLAA and the (site suitability) emerging Plan and the Interim Sustainability Report is, therefore, clearly incorrect.
- 5. THE SUSTAINABILITY OF THE CANDLET ROAD SITE AND THE COUNCIL'S SUSTAINABILITY APPRAISAL
- 5.1 Christchurch commissioned Turley Sustainability earlier this year to carry out a detailed Sustainability Appraisal of the land north of Candlet Road (February 2015).
- 5.2 The Sustainability Appraisal clearly confirms that this location is a highly sustainable location for residential development, abutting the main area of Felixstowe, the largest town in the District.
- 5.3 The Turley Sustainability Appraisal also references (a copy of the Report is attached) the recommendations contained in the 2008 Report where the current Head of Planning Services at the Council (Philip Ridley) confirmed that the land north of Candlet Road Felixstowe that this site presented the most appropriate and sustainable option for the growth of the town.
- 5.4 It is particularly noted, that Mr Ridley did not favour the "dispersed pattern of development" as advocated by both the Local Plan (July 2013) and the emerging Site Allocations.
- 5.5 The Council have prepared an Interim Sustainability Appraisal Report (October 2015) to support the emerging AAP. The Sustainability Appraisal must be shown to be adequate. It is submitted that, when subject to detailed examination, it will become apparent that the Sustainability Appraisal is not adequate, particularly with regard to the way that the Sustainability Appraisal appraises the strategic alternatives. It is not clear from the appraisal that the Preferred Options chosen, there is no indication in the Sustainability Appraisal of the reasons why these specific choices have been made against potential alternative locations. As a consequence, there is no basis to say whether the Preferred Options would perform better, or worse, than the preferred options in the emerging Plan.
- 5.6 In other words, it cannot be concluded that the Council have properly taken into account reasonable alternatives and, essentially, this is why there is no basis for finding the Preferred Options to be sound.
- 6. ALTERNATIVE SITES (PREFERRED OPTIONS)
- 6.1 It is for each strategic site allocation promoter to satisfy the Inspector that the sites are deliverable. In terms of land at Candlet Road Felixstowe, as an omission site which should be included in the Local Plan, the following facts are relevant to consideration of its conformity to Paragraph 47 of the Framework "to boost significantly the supply of housing"
- * The site is available and is in the ownership of one party
- * The site has developer interest meeting the requirements of Paragraph 173 of the Framework.
- * There are not any technical reasons why this site should not be deliverable (highways, drainage, ecology etc).
- * The site will be relatively easy to develop in comparison to other sites.
- * The site benefits from good access to infrastructure and is a sustainable location for development affording good access to transport links and other facilities.
- 6.2 It is submitted that in summary form, the circumstances that justify the redrawing of the settlement boundary to enable housing development of some 560 dwellings (including affordable housing) to be delivered at Candlet Road are as follows:

O - 7014 - 2980 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

7014 Object

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

- 1) The focusing of housing growth adjacent to Felixstowe represents a highly sustainable growth option.
- 2) The most sustainable strategy for accommodation of housing growth at Felixstowe is for new development to be accommodated either within the existing limits of the urban area, and then sustainable urban extensions such as the site.
- 3) It is considered that the site enables the redefinition of the settlement boundary that will endure for the long term and create a new defensible boundary.
- 4) The site is located near existing public transport routes and there remains the opportunity to enhance linkages which will further improve the sustainability credentials of the site.
- 6.3 It is indicated previously that there are fundamental concerns with regard to the adequacy of the preferred options site selection procedure. It is also submitted that a further area of concern relates to
- (i) the deliverability of the preferred options sites, in the context of further technical evidence that may be required (for example Transport assessments, air quality assessments and so on), and
- (ii) Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("the 1990 Act") obliges the decision maker, when considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting, or any features of special architectural or historic interest which it possesses.
- 6.4 In R (on the application of Forge Field Society) v Sevenoaks District Council [2014] EWHC 1896 (Admin), Lindblom J referred to this duty and the parallel duty under Section 72(1) of the 1990 Act in relation to development within a conservation area in the following terms with our emphasis added:
- ".... it is to recognise, as the Court of Appeal emphasised in [East Northamptonshire District Council v Secretary of State for Communities and Local Government [2014] EWCA Civ 137], that a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one. It is not irrebuttable. It can be outweighed by material considerations powerful enough to do so.

But an authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering".

6.5 This has not happened. Furthermore, paragraph 169 of the Framework requires the Local Planning Authority to have

"up to date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to the environment....."

7. CONCLUSIONS

- 7.1 It is considered, for the reasons outlined in this submission, that the land at Candlet Road should be allocated in the
- 7.2 By omitting the site, the Plan would fail to significantly boost housing supply and fail to meet the objectively assessed housing needs of the District (paragraphs 14 and 47 of the Framework).
- 7.3 It is submitted that the AAP document would be sound in securing the necessary delivery for infrastructure, and an appropriate delivery of new housing if land at Candlet Road is allocated for housing as part of an urban extension for Felixstowe.
- 7.4 The proposed release of land at Candlet Road represents the most sustainable, viable and ultimately deliverable option to achieve the required housing and infrastructure needs for Felixstowe and the surrounding area.
- 7.5 It is submitted, therefore, that the Candlet Road site should be a preferred location for housing, being an appropriate urban extension to Felixstowe where the other competing sites do not relate as well in terms of connections and accessibility to the town, that against this criteria the Candlet Road site is the most sustainable and appropriate option for the extension (growth) of Felixstowe.

Richard Brown MSc

O - 7014 - 2980 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

7014 Object

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

27th November2015

Annexures

- 1. Site plan
- 2. Local Development Framework Task Group Report on 04/08/08 (LPTG 11/08)
- 3 Masterplan

Summary:

It is considered, for the reasons outlined in this submission, that the land at Candlet Road should be allocated in the

By omitting the site, the Plan would fail to significantly boost housing supply and fail to meet the objectively assessed housing needs of the District. It is submitted that the AAP document would be sound - in securing the necessary delivery for infrastructure, and an appropriate delivery of new housing - if land at Candlet Road is allocated for housing as part of an urban extension for Felixstowe.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

YOR.2258.010.revJ - Indicative Masterplan FINAL 260615.pdf YOR.2258.001.revE - Felixstowe Site location plan A3 130215.pdf Land North of Candlet Road Felixstowe - Sustainability AppraisalFINAL.PDF

C - 7248 - 2757 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

7248 Comment

Appendix 7: Felixstowe, Trimley St Mary & Trimley St

Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St

Martin Inset Map

Respondent: Mr Andy Smith [2757] Agent: N/A

Full Text: Felixstowe Town Centre

The introduction of the term "Primary Shopping Area", as distinct from the crucial and long established "Primary Shopping Frontage" is unhelpful and confusing. It adds nothing useful to the (updated) long standing "Town Centre Area" concept, expect perhaps to suggest that retail uses would be discouraged in the area between the two, a novel and superfluous distinction. In fact, it is directly unhelpful as currently drafted, excluding the land adjacent to the station which has current planning permission for a supermarket, and for years had an extant previous permission for retail warehousing, highly desirable. It also excludes lower Hamilton Road and Bent Hill, both of which areas we would wish to see prosper in a retail and/or town centre mixed use mode, there by adding to the overall offer and in addition to better linkage between town centre and sea front, a long standing aspiration. Beyond that is has confused every reader of the document that I have spoken to. The policy and associated indication on the maps should be removed.

Clarity of Map

The main map at Appendix 7, while improved from earlier version, remains very hard to read and interpret. The clarity of the presentation on the map in the 2001 Plan is greatly superior. The lines need to be finer, and in more easily distinguished colours. The policy annotations key at the bottom should quote relevant FPP numbers. Clarity of the lines and hatchlings would be improved by the use of the "feint" style of OS base map. Also, that is out of date in regard to retaining the representation of the old groynes, replaced in 2008 (South) and 2012 (Central) respectively. I am fairly certain I have seen OS versions which are up to date in this respect. Again, if available, that would help clarity in that the groynes themselves become useful landmarks to locate details.

Summary:

The main map, while improved from earlier version, remains very hard to read and interpret. The clarity of the presentation on the map in the 2001 Plan is greatly superior. The lines need to be finer, and in more easily distinguished colours. The policy annotations key at the bottom should quote relevant FPP numbers. Clarity of the lines and hatchlings would be improved by the use of the "feint" style of OS base map. Also, that is out of date in regard to retaining the representation of the old groynes, replaced in 2008 (South) and 2012 (Central) respectively.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

C - 7250 - 3929 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

7250 Comment

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Respondent: The Limes & Grange Farms Trust (Mr Gavin

Rowlands) [3929]

Agent: N/A

Full Text:

Submission of Representations to Suffolk Coastal District Council's Felixstowe Peninsula Area Action Plan - Preferred Options Consultation Document (19th October 2015 to 30th November 2015)

I write on behalf of the landowners of a 1.7 hectare site at High Road, Trimley St Martin, Suffolk. Please find attached a plan outlining the land referred to.

We are concerned with the soundness of the proposed Felixstowe Peninsular Area Action Plan (AAP) and the AAP's failure to allocate suitable sustainable sites. At a site specific level, the AAP fails to take the opportunity to allocate additional land at Trimley St Martin in accordance with the development strategy set out in the Core Strategy, which seeks to meet the 'minimum locally identified housing needs of the district for the period 2010 to 2027'. Although the site does not immediately abut the village boundary, the site in question is sustainable and suitable for development. In accordance with the presumption in favour of sustainable development and the significant need to boost the supply of housing we propose that it should be included as an Allocation.

The National Planning Policy Framework sets out "a presumption in favour of sustainable development" where Local Plans should meet objectively assessed needs and development which is sustainable should be approved without delay.

At the strategic level housing numbers and distribution are set out in the Core Strategy 2013. Core Strategy Policy SP2 notes that provision will be made for at least 7,900 new homes, distributed in accordance with the settlement hierarchy. The Policy commits to an early review in order to meet the full Objectively Assessed Housing Needs for the District. The Core Strategy also references the need for an extra 11,000 dwellings as identified in the work commissioned by Oxford Economics (OE) in 2010. The District still does not appear to have a published understanding of its current Objectively Assessed Need. The OE figure of 11,000 dwellings is now very old and predates the NPPF.

While it is noted that the Site Allocations and Area Specific DPD Issues and Options consultation commenced in 2015, it is of significant concern that this occurred ahead of the objectively assessed housing needs for the District being reviewed, updated and firmly established.

Policy FPP1 of the Felixstowe Peninsular AAP gives the impression that it is still working to the Core Strategy target of 7,900 and does not explain if it is actually working to OE figure or some other estimate.

Suffolk Coastal District Council published a Housing Supply Land Assessment in June 2015 for the period 1st April 2016 to 31st March 2021. It assesses the current five year +5% supply of housing land to be 5.12 years. Again, the current assessment is still based on the Core Strategy target of 7,900. As set out above, this is an acknowledged under estimate of the actual objectively assessed need, which in the absence of anything more up to date, on the best available evidence potentially suggests a target in the region of 11,000 dwellings.

Further, it appears to rely on the early unconfirmed delivery of some large developments with outline permission which are still subject to S106 agreements. If the 11,000 dwelling figure is applied then a five year supply in all probability does not actually exist. This suggests that the Felixstowe Peninsular AAP will struggle to demonstrate compliance with paragraph 182 of the NPPF at examination.

The overall spatial strategy set out in the Core Strategy (Policy SP2) provides for development to be focused in the Eastern Ipswich Plan Area, at Felixstowe and the Trimley Villages and shared between the market towns. Policy SP19 identifies that Felixstowe, Walton and the Trimley Villages will accommodate a proposed housing growth of 22%. Furthermore this was reiterated in the Strategic Housing Land Availability Assessment (March 2014).

The Felixstowe Peninsula AAP in Policy FPP1 identifies a minimum requirement for a further 807 units before 2027 as necessary to meet the Core Strategy requirement. However, as previously mentioned above these figures are a minimum and the AAP should be seeking to maximise delivery in sustainable locations in order to boost significantly the supply of housing as required by the NPPF. It is therefore contended as set out in more detail above, that policy FPP1 should be setting a more ambitious target, and in the absence of any more recent objectively assessed need, looking to a District target of 11,000 dwellings rather than the 7,900 derived from the Core Strategy.

The Felixstowe Peninsular AAP identifies 7 sites as preferred option allocations. Two of these are in Trimley St Martin and one in Trimley St Mary. The indicative capacities of these preferred site allocations suggests they could deliver 1,135 dwellings between them. However the delivery, quantum and likely timing of delivery is not certain. It is noted that the two largest sites, FPP8 Land off Thurmans Lane, Trimley St Mary and FPP4 Land north of Walton High Street, Felixstowe do not appear to be very advanced. With this in mind in order to maintain a realistic five year supply it will be important for the District to maintain the delivery of smaller sites which can readily come forward.

THE LAND

Trimley St Martin lies to the west of Felixstowe, between the A14 to the north-east and the railway line to the south-west. The village of Trimley St Mary lies immediately to the south east separated by a small gap. The two villages are immediately adjacent to Felixstowe and identified in the Core Strategy as Key Service Centres due to their extensive

C - 7250 - 3929 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

7250 Comment

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

range of facilities and proximity to Felixstowe.

When considering the Trimley Villages and the opportunities for further allocations, Trimley St Mary is the larger of the two settlements and any significant further expansion may potentially undermine the sustainability of it as a village. Trimley St Martin being the smaller of the two settlements would appear to have greater capacity to absorb further growth. Trimley St Mary is also constrained by its proximity to Felixstowe, the ANOB designation to the south-west, the A14 to the north-east and its proximity to Trimley St Martin to the north. There are therefore few obvious alternative locations for the expansion of its physical development limits. On this basis, there is considerably more potential to look at a further extension of the physical development limits of Trimley St Martin.

In terms of the site itself it is in close proximity to employment opportunities and good public transport provision. Air quality appears to be an issue with the majority of the preferred allocation sites being close to Felixstowe and the A14. On the basis of the degree of separation, it would be reasonable to conclude that this site is likely to perform better in respect of air quality. The same principle applies in terms of noise and the existing buffer between the site and the A14. In addition given the scale of any development of the land, it would be unlikely to generate any highway safety or capacity issues which could impact on the quantum of development achievable and delay delivery.

It is clear that this site has many advantages over some of the preferred allocations and there are no known obstacles to it coming forward for development. It is in a sustainable location and could deliver much needed housing, including affordable housing.

The land is not included as a housing allocation and it is contended that it should be included on the basis that it is both sustainable and available. It is also contended that the AAP should be more ambitious in order to meet local housing need and it would be appropriate for the site to be included based on the presumption in favour of sustainable development.

Clearly this land has the potential to make a positive contribution towards housing delivery either as an additional allocation to help boost local housing supply, or alternatively as a reserve site to be brought forward in the event that other sites identified within the AAP fail to deliver the requisite amount of housing during the Plan period.

Furthermore this site is sustainable and deliverable and importantly could come forward. As such, we consider that it should be identified within the AAP either as an additional allocation site or as a reserve site.

We trust that the above is self-explanatory and will be given full consideration by the Council in the ongoing AAP preparation. In the meantime, we would be grateful to receive confirmation of receipt of these representations.

Summary:

Site adjacent to Goslings Farm, Trimley St Martin is in close proximity to employment opportunities and good public transport provision. Air quality appears to be an issue with the majority of preferred allocation sites being close to Felixstowe and the A14. On the basis of the degree of separation, reasonable to conclude site is likely to perform better in respect of air quality. The same applies to noise and the buffer between the site and A14. It would be unlikely to generate any highway safety or capacity issues which could impact on the quantum of development achievable and delay delivery.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Felixstowe Peninsula AAP - Representations_Redacted.pdf

S - 7283 - 3943 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

7283 Support

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Respondent: The Exilarch's Foundation [3943] Agent: Pegasus Planning Group (Jamie Roberts) [3942]

Full Text:

I write to you on behalf of my client, the Exilarch's Foundation, to submit comments to the above consultation. The Exilarch's Foundation is a registered charity which funds educational projects in the UK and internationally; the Foundation has interests in the Anzani House site located on Trinity Avenue, Felixstowe.

We welcome the AAP's clear recognition within Section 4 - Employment of the Port of Felixstowe's economic importance, locally, regionally and nationally. We note that the AAP also highlights the role that surrounding port-related activities have in supporting the Port of Felixstowe and the benefits that are realised through the 'clustering' of similar uses. We therefore support the designation of the Strategic Employment Area which recognises the need for the clustering and intensification of port-related activity in a location which benefits from good infrastructure. We also support Policy FPP10: Port of Felixstowe which seeks to direct port-related development to the Strategic Employment Area including distribution and haulage uses.

We do however note that the haulage and distribution industry is a dynamic one which must be able to quickly adapt to the demands of international markets and technological change. As such, the need for operational flexibility is essential and this should be recognised either through the policy wording or supporting text.

We wish to specifically highlight the potential that the Anzani House site can play in securing the economic success of the Port and related businesses. The site could be suitably redeveloped to create a transportation depot which would complement existing uses and benefit from its position directly between the Port and the A14 trunk road. The site is large enough to provide a flexible depot with space to adapt to the rapidly-changing requirements of the distribution industry. However an additional option is the conversion of Anzani House into residential apartments, which would provide a convenient base particularly for workers within and around the Port.

I trust these submissions will be carefully considered through the plan preparation process and I look forward to being kept up to date with the progress of the Area Action Plan. If you have any queries or wish to discuss our submission further, please do not hesitate to contact me on the details below.

Summary:

The haulage and distribution industry is a dynamic one which must be able to quickly adapt to the demands of international markets and technological change. The need for operational flexibility is essential and this should be recognised either through the policy wording or supporting text. We wish to specifically highlight the potential that the Anzani House site can play in securing the economic success of the Port and related businesses . The site could be redeveloped to create a transportation depot which would complement existing uses and benefit from its position directly between the Port and the A14 trunk road.

N/A

N/A Change to Plan

Appear at exam? Legal? Sound? **Duty to Cooperate?** Soundness Tests Not Specified Not Specified Not Specified Not Specified

Attachments:

S - 7314 - 3949 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

7314 Support

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Respondent: Pigeon Investment Management Ltd [3949] Agent: Strutt & Parker (Mr Richard Clews) [3945]

Full Text:

1 INTRODUCTION

- 1.1 This representation has been prepared by Strutt Parker LLP on behalf of Pigeon Investment Management Ltd in respect of land at Trimley St Martin, Alternative Option Site 3022a in response to the six week public consultation (19th October 2015 to 30th November 2015) on the Felixstowe Peninsular Area Action Plan, Preferred Options Document, hereafter referred to as the Felixstowe Peninsular AAP. It should be read in conjunction with the following documents copies of which are contained within the appendices and summarised in the delivery statement section of this consultation response below:
- * Site Plan;
- * Indicative Layout Plan;
- * Preliminary Drainage Appraisal October 2015;
- * Desk-based Archaeological Assessment;
- * Landscape and Visual Assessment;
- * Preliminary Ecological Appraisal; and
- * Transport Report
- * Phase 1 Contamination Report

2 EXECUTIVE SUMMARY

- 2.1 As set out in these representations there are some fundamental concerns regarding the soundness of the Felixstowe Peninsular AAP and the Area Specific Policies Development Plan Document (DPD). These relate specifically to the approach adopted and the plan's failure to allocate suitable sustainable sites to address the issues arising from the failure to clearly identify up to date objectively assessed housing need for the District. There appears to be a conflict with Policy SP2 of the Core Strategy (2013) and the requirements of the National Planning Policy Framework(NPPF).
- 2.2 In respect of the Felixstowe Peninsular AAP, at a site specific level, the concern is that the plan fails to take the opportunity to allocate additional land at Trimley St Martin in accordance with the development strategy set out in the adopted Core Strategy. The site in question, Alternative Option Site 3022a, was identified as suitable in the SHLAA 2014.

It is sustainable, available and deliverable. It would represent a logical extension to the physical development limits of the village. In accordance with the presumption in favour of sustainable development and the need to boost significantly the supply of housing it is contended that it should be included as a Preferred Allocation.

3 POLICY BACKGROUND

- 3.1 The Site Allocations and Area Specific Policies Development Plan Document Preferred Options Consultation Document, October 2015 has been published for public consultation along with the Felixstowe Peninsular AAP. These two documents seek to provide the policies and allocations necessary to implement the strategic policies set out in the Suffolk Coastal District Local Plan Core Strategy and Development Management Policies, July 2013 document. Together the Core Strategy, Site Allocations and Area Specific Policies Document and the Felixstowe Peninsula AAP will form the Development Plan for Suffolk Coastal District Council.
- 3.2 While this representation relates to the Felixstowe Peninsular AAP preferred options document and more specifically proposed allocations in the village of Trimley St Martin, it also has to be considered in the wider context of the planning policy framework for the whole of the District.

4 NATIONAL PLANNING POLICY FRAMEWORK

- 4.1 Paragraph 14 sets out that "a presumption in favour of sustainable development" is at the heart of the Framework and describes this as "a golden thread running through both plan-making and decision taking." It goes on to state that for plan- making this means:
- * "Local planning authorities should positively seek opportunities to meet the development needs of their area;
- * Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change..."

These requirements are repeated in more detail throughout the Framework. Paragraph 15 requires the presumption in favour of sustainable development to be applied to local plan policies so that development which is sustainable can be approved without delay.

- 4.2 The Core Planning Principles set out at paragraph 17 include a set of overarching objectives which should underpin plan making. Of particular relevance to this consultation response are that planning should be:
- * plan-led with up to date plans providing a practical framework for predictable and efficient decisions.
- * Not be about scrutiny but be a creative exercise.
- * Proactively drive sustainable development to deliver the homes the country needs.
- 4.3 Every effort should be taken to objectively identify and meet the needs of the area. Sufficient land suitable for development having regard to market signals should be
- 4.4 Paragraph 47 sets out a clear challenge to local planning authorities "to boost

significantly the supply of housing..." In order to achieve this they should ensure

that their Local Plan meets the full objectively assessed needs for the area and they should identify and annually update their five year housing supply.

4.5 For plan-making paragraph 151 advises that Local Plans should be consistent with the policies and principles of the Framework, "...including the presumption in favour of sustainable development."

S - 7314 - 3949 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

7314 Support

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- 4.6 Paragraph 154 requires Local Plans to be "...aspirational but realistic" and paragraph 159 reminds local planning authorities that they "...should have a clear understanding of housing needs in their area."
- 4.7 Finally, for a local plan to be found sound at examination by an independent inspector the Framework at paragraph 182 advises that it should satisfy the following tests, namely that it is:
- * "Positively prepared the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- * Justified the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- * Effective the plan should be deliverable over its period and based on effective joint working on cross- boundary strategic priorities; and
- * Consistent with national policy the plan should enable the delivery of sustainable development in accordance with the policies in the Framework."
- 4.8 For the purposes of this consultation it is necessary to consider whether the Felixstowe Peninsular AAP satisfies the above objectives.

5 APPROACH TO HOUSING GROWTH

Core Strategy

5.1 At the strategic level housing numbers and distribution are set out in the Core Strategy.

Objective 2 states:

"To meet the minimum locally identified housing needs of the district for the period 2010 to 2027, taking into account existing and future economic,

environmental and social opportunities and constraints'

In respect of this objective there are two important points to note. Firstly, that the Core Strategy seeks to meet the minimum locally identified housing need, and secondly, that it is a locally identified housing need for the plan period. 5.2 However, it is considered given the acknowledged short fall that the DPD and AAP should be based on the NPPF principles set out above including; to be aspirational; provide flexibility; positively seek to meet identified needs; and most importantly, to significantly boost housing supply. It is therefore considered that the Felixstowe Peninsular AAP should be setting its own, up to date and ambitious objectives.

- 5.3 Core Strategy policy SP2 sets out housing numbers and distribution. However, policy SP2 notes that provision will be made for at least 7,900 new homes, distributed in accordance with the settlement hierarchy set out in policy SP19. The policy then goes on to commit to an early review in order to identify the full objectively assessed housing needs for the District, to ensure this is met in so far as this is consistent with the policies of the NPPF.
- 5.4 The Inspector's report in respect of the Core Strategy Examination (June 2013) made it clear that an early review was essential as at the time the Council had identified an objectively assessed need of 11,000 dwellings. At paragraph 46 of the Inspector's Report he commented:

"Even if the theoretical capacity of all the sites included in the Strategic Housing Land Availability assessment (SHLAA), existing commitments potential brownfield opportunities, allocations carried forward from the previous Local Plan and a windfall allowance were taken into account, the provision would fall some way short of the 11,000 dwellings required."

5.5 At this point, the Inspector clearly gave consideration to suspending the Examination. However, he concluded that as none of the adjoining Councils had objected to the scale of housing proposed, that having a core strategy in place with an early review would be preferable to the alternative of suspension of the examination and the likely withdrawal of the plan.

5.6 While it is noted that the Site Allocations and Area Specific DPD Issues and Options consultation commenced in 2015, it is of significant concern that this occurred ahead of the objectively assessed housing needs for the District being reviewed, updated and firmly established. Policy CS2 states:

"An early review of the Core Strategy will be undertaken, commencing with the publication of an Issues and Options Report by 2015 at the latest. The review will identify the full, objectively assessed need for the District and proposals to ensure that this is met in so far as this is consistent with the policies in the National Planning Policy Framework."

5.7 On the basis of the currently available information the Felixstowe Peninsular AAP and the DPD are inconsistent with this adopted policy, and paragraph 158 of the NPPF which requires that the Local Plan is "...based on adequate, up-to-date and relevant evidence..."

5.8 Table 3.1 of the Core Strategy references the need for an extra 11,000 dwellings as identified in the work commission by Oxford Economics (OE) in 2010. It goes on to suggest that the review should identify land to meet the current acknowledged shortfall between the locally assessed requirement and the OE objectively assessed need (OAN). However, the District still does not appear to have a published understanding of its current OAN. The OE figure of 11,000 dwellings is very old and predates the NPPF. As advised in Planning Practice Guidance regarding housing need assessments, the household projections published by the Department for Communities and Local Government provide the starting point estimate of overall housing need (ID: 2a-015-20140306). The DCLG estimate may require adjustment to reflect factors affecting local demography and household formation rates. However, the Sub National Household Projections (2015) suggest a growth of 8,362 for the period 2010 to 2027 and this is not

referenced in the SAASP document or the AAP. This indicates that the Core Strategy figure promoted in the SAASP is out of date. While the DCLG figure is lower than the OE figure, it is clear that the Core Strategy proposal to provide 7,900 homes is lower than the most recent projections that the Council should be considering as a starting point for

S - 7314 - 3949 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

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understanding its OAN. On the basis that the 2010 OE figure was 11,000, the reality is that the actual objectively assessed need figure is likely to be higher than 8,362 and that 7,900 would fail to meet the OAN.

5.9 Policy FPP1 of the Felixstowe Peninsular AAP gives the impression that it is still working to the Core Strategy target of 7,900 and does not explain if it is actually working to the OE figure or some other estimate and if so what that actually equates to for the AAP. On this basis there must be a concern that at examination the Felixstowe Peninsular AAP will not be found to comply with the tests set out in paragraph 182 of the NPPF, failing all the tests.

Five Year Housing Supply

5.10 In June 2015 Suffolk Coastal District Council published a Housing Supply Land Assessment. This covers the period 1st April 2016 to 31st March 2021 and identifies the current position with regard to identifying a five year +5% supply of housing land which it assess as 5.12 years.

5.11 Paragraph 3 acknowledges the supply in 2014 was 4.3 years this is a figure which has been borne out in appeal decisions as recently as September 2015

(APPJ3530/A/14/2225141). Fundamentally, the current assessment is still based on the Core Strategy target of 7,900. As set out above, this is an acknowledged under estimate of the actual objectively assessed need, which in the absence of anything more up to date, on the best available evidence suggests a target in the region of 11,000 dwellings. 5.12 In addition, it is also observed that the projections contained in table 3 still appear to rely on the early unconfirmed delivery of some large developments with outline permission which are still subject to S106 agreements. Taking these factors into consideration the five year supply with a modest surplus of 0.12 years, must reasonably be considered vulnerable to challenge at this time. If the 11,000 dwelling figure or even the lesser DCLG Household projection of 8,362 are applied then a five year supply in all probability does not actually exist and is at best 4.75 years.

5.13 Again, this point suggests that the Felixstowe Peninsular AAP will struggle to

demonstrate compliance with paragraph 182 of the NPPF at examination and reinforces the need to allocate additional land within the AAP.

Felixstowe Peninsular AAP

5.14 The overall spatial strategy set out in the Core Strategy (see policy SP2) provides for development to be focused in the Eastern Ipswich Plan Area, at Felixstowe and the Trimley Villages and shared between the market towns. Policy SP19 identifies that Felixstowe, Walton and the Trimley Villages will accommodate a proposed housing growth of 22%. Furthermore the Strategic Housing Land Availability Assessment (March 2014) acknowledges:

"The core Strategy expects the Market Towns and the Felixstowe and the

Trimleys area to accommodate a considerable proportion of the growth identified for the district to 2027".

5.15 The Felixstowe Peninsula AAP in policy FPP1 identifies a minimum requirement for a further 807 units before 2027 as necessary to meet the Core Strategy requirement. However, as previously mentioned above these figures are a minimum and the AAP should be seeking to maximise delivery in sustainable locations in order to boost significantly the supply of housing as required by the NPPF. It is therefore contended as set out in more detail above, that policy FPP1 should be setting a more ambitious target, and in the absence of any more recent objectively assessed need, looking to a District target of 11,000 dwellings rather than the 7,900 derived from the Core Strategy. Policy FPP1 should therefore be reworded to identify a higher overall target and as such an appropriate apportionment, for Felixstowe Peninsular. 5.16 It must be acknowledged that the AAP states at paragraph 3.13:

"The Felixstowe Peninsula AAP identifies over 1,100 units on the preferred sites outlined in this document. The Council consider it necessary to over allocate sites across the district to ensure that a five year land supply is maintained which is paramount. Over allocating also provides a range of sites, sizes and locations for development to allow a choice of location for those looking for a residential property. It also takes into account that the population is growing and that the Council's objectively assessed housing need is likely to increase in the future. The delivery of sites will be monitored throughout the plan period to consider how

the AAP is performing against the Core Strategy targets.'

5.17 While this additional provision is welcome, it is still unclear if it will provide sufficient sites, which are available and deliverable, to enable the District to demonstrate a five year housing land supply in the short term. The current five year supply is not based on an up to date objectively assessed need. It is therefore contended, that opportunities should be taken to allocate more sustainable sites that can be delivered in accordance with Core Strategy spatial strategy so that the District can significantly boost its supply of housing as required by the NPPF. These sites should allow for variety in house types and

tenures to come forward to meet local needs and ensure choice and competition in the market for land (NPPF paragraph 47).

5.18 From the statement in paragraph 3.13 the Council appears to be acknowledging that the objectively assessed need is rising and site allocations should reflect this. It would therefore seem logical, and in the interests of good planning, for them to plan to meet this need now, by way of the allocation of further sustainable sites.

Felixstowe Peninsular AAP Preferred Site Allocations

5.19 The Felixstowe Peninsular AAP identifies 7 sites as preferred option allocations. Two of these are in Trimley St Martin and one in Trimley St Mary and are identified on the inset maps in the AAP. A summary of the 7 sites is set out below along with some brief summary observations in italics which are considered relevant to this consultation response: 5.20 Preferred Policy FPP3: Land at Sea Road, Felixstowe

Land is identified at Sea Road, Felixstowe for a mixed use development of commercial /tourism uses and residential dwellings. (Indicative Capacity 40 dwellings)

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It is noted that this is a mixed use site and residential development will be dependent on

There is also an issue with sewage capacity which may impact on viability. Finally if the market has to be relocated this could also significantly delay delivery.

5.21 Preferred Policy FPP4: Land north of Walton High Street, Felixstowe

Land is identified north of Walton High Street for a mixture of residential units; including on site open space,

comprehensive landscaping and new business units. (Indicative Capacity 400 dwellings)

This site is dependent on the Rifle Club being relocated, requires a master plan to

include a link road which could in turn impact on viability. The policy acknowledges that it is likely to be a longer term opportunity. There are also air quality and sewage capacity issues to be resolved.

5.22 Preferred Policy FPP5: Land north of Conway Close, Felixstowe

Land is identified to the north of Conway Close for a residential development. (Indicative Capacity 150 dwellings) The site could come forward, however, there are still sewage capacity and air quality issues to be addressed and the site is adjoined by heritage assets.

5.23 Preferred Policy FPP6: Land opposite Hand in Hand Public House, Trimley St

Martin Land is identified on Trimley High Road for residential development with on site open space to provide a village green. (Indicative Capacity 70 dwellings)

The site could come forward with access on to the High Street. The Public House is a listed building and therefore development proposals will have to be sensitive to its status which may limit capacity.

5.24 Preferred Policy FPP7: Land off Howlett Way, Trimley St Martin

Land is identified at Howlett Way for residential development with on site open space. (Indicative Capacity 360 dwellings)

Access to the site has not been identified in detail other than off Howlett Way. There are air quality issues and concerns regarding the setting of the Old Rectory. In addition there is a water main crossing the site. The site wraps round the Old Poultry Farm and the Old Rectory both of which may delay availability.

5.25 Preferred Policy FPP8: Land off Thurmans Lane, Trimley St Mary

Land is identified south of Thurmans Lane for residential development. (Indicative

Capacity 100 dwellings)

This site could come forward, again it is subject to air quality issues and the need to have regard to Mill Farm a Grade II Listed Building, it will also have to be accessed through the adjoining residential areas.

5.26 Preferred Policy FPP9: Land at Bucklesham Road, Kirton

Land is identified south of Bucklesham Road for residential development. (Indicative Capacity 15 dwellings)

This is a relatively small ribbon development site which could come forward. There are potentially issues to be resolved in respect of local sewage capacity in the village.

Assessment of Preferred Allocations

5.27 If the preferred site allocations indicative capacities are totalled up cumulatively this suggests they could deliver 1,135 dwellings between them. However, as set out above the delivery, and more importantly, the quantum and likely timing of delivery is much less certain. It is noted that the two largest sites, FPP8 and FPP4 do not appear to be very advanced. With this in mind in order to maintain a realistic five year supply it will be important for the District to maintain the delivery of smaller sites which can readily come forward.

6 ALTERNATIVE OPTION SITE 3022A

6.1 The site the subject of this representation, Alternative Option Site 3022a is just such a site and accordingly it is contended that it should be included as a preferred allocation on the basis that it is available and deliverable at the present time. In addition, it does not need to overcome the issues and constraints associated with some of the preferred allocations set out above and as such can contribute to the acknowledged shortfall in housing need, within the first five years of the Plan period. It is also contended that the AAP should be more ambitious in order to meet local housing need and it would be appropriate for the site to be included based on the presumption in favour of sustainable development

6.2 When considering the Trimley Villages and the opportunities for further allocations, Trimley St Mary is the larger of the two settlements and any significant further expansion may potentially undermine the sustainability of it as a village. Trimley St Martin being the smaller of the two settlements would appear to have greater capacity to absorb further growth. Trimley St Mary is also constrained by its proximity to Felixstowe, the ANOB designation to the south-west, the A14 to the north-east and its proximity to Trimley St Martin to the north. There are therefore few obvious alternative locations for the expansion of its physical development limits. On this basis, there is considerably more potential to be looking at a further extension of the physical development limits of Trimley St Martin.

6.3 In so far as this consultation is concerned, clearly a further allocation on the northwestern side of Trimley St Martin would make a positive contribution towards housing delivery. Alternative Option Site 3022a is in a sustainable location and is not environmentally sensitive. It does not represent a risk of coalescence and is a natural and logical extension of the settlement with clear and defensible boundaries. It is contained to the north-east by the allotment gardens, by the existing built development in the western corner, the road and established settlement to the south. As set out below it is a deliverable site with no obvious constraints or limitations. It is available and could come forward very quickly to make an almost immediate contribution to boosting local housing supply. As such, it is considered that it should be identified as a preferred

residential site allocation.

Sustainability Appraisal

6.4 It is surprising that Alternative Option Site 3022a did not score more highly in the Preferred Options Sustainability Appraisal when compared to the preferred sites listed above.

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7314 Support

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6.5 The overall assessment concluded for site 3022a as follows:

"The site scores well in terms of economic effects due to its close proximity to employment opportunities and given relatively good public transport provision. The loss of Grade 2 agricultural soil results in a major negative environmental effect. However, there may be scope for mitigation."

6.6 In response to the major negative environmental effect of using Grade 2 agricultural land, it is clear that there is no difference with the conclusions for a number of preferred allocations. The proposed site is on the boundary of grade 2/3 agricultural land. All undeveloped and proposed allocation sites within Trimley St.Mary and Trimley St.Martin are on Grade 2 Agricultural Land. The proposed site is therefore no more important for protection as agricultural land than the allocated sites and may in fact be less desirable due to the size of the site and the overall quality. One of the objectives where the site did not score very favourably was in respect of SA Objective 8, to improve the quality of life and where people live. The SA comment here incorrectly assumed that the site will be accessed via the adjoining estate roads and as such could potentially result in a negative

impact for local residents. The reality, as set out in more detail in the delivery statement below, is that access can be provided directly on to High Road.

6.7 In respect of the site assessments and commentaries for the preferred allocations set out in the AAP, there appear to be a number of reoccurring themes which do not necessarily appear to be reflected in the sustainability appraisals. These are as follows:

Air Quality: This is clearly an issue with air quality assessments being required for the majority of the preferred allocation sites. This is an issue, particularly associated with proximity of the sites to the urban area of Felixstowe and major transport routes including the A14. In respect of the majority of the preferred allocations, and in particular the largest sites, these are more closely related to the A14 and Felixstowe than Alternative Option Site 3022a. As such, simply on the basis of the degree of separation, it can be concluded that site 3022a will perform better in respect of air quality.

Sewage Capacity: Sewage capacity is an issue raised by Anglian Water in respect of the Felixstowe sites and the site in Kirton. These sites potentially require improvement to the capacity of the foul sewer network. This does not appear to be an issue for the Trimley Villages and as set out in the delivery strategy below a preliminary foul and surface water drainage strategy has already been prepared for Alternative Option Site 3022a.

Noise: The potential impact of noise does not appear to have been given much consideration. It should be noted, that some of the preferred allocations lie adjacent to junctions on the A14. These sites or parts thereof may be susceptible to noise disturbance which may require mitigation and/or potentially reduce the developable area. Alternative Option Site 3022a, lies to the south of the A14 separated by the established allotment gardens and as such is unlikely to be adversely affected by noise from the road.

Transport Assessments: The larger preferred option allocations will require transport assessments to be carried-out. These may potentially reveal highway safety or capacity issues which could impact on the quantum of development achievable and delay delivery. This would not be necessary with the scale of development proposed on Alternative Option Site 3022a.

Heritage Assets: A number of the preferred option sites have a close relationship with existing heritage assets. In some cases the SA scored these relationships to be positive on the basis that the setting may be improved. It does not necessarily seem reasonable that a site that will have an impact on heritage assets should score more highly than one where heritage assets are unaffected as is the case with Alternative Option Site 3022a.

6.8 In conclusion it is clear from the above that Alternative Option Site 3022a has many advantages over some of the preferred allocation sites and there are no obstacles to it coming forward for development. It is in a sustainable location and could readily deliver much needed housing, including affordable housing, a significant social benefit, with very limited environmental consequences. This assessment further supports the case that it should be included as a preferred allocation.

Deliverability

6.9 Trimley St Martin lies to the west of Felixstowe, between the A14 to the north-east and the railway line to the south-west. The village of Trimley St Mary lies immediately to the south east separated by a small gap. The 2011 Census reported the population of Trimley St Mary as 3,673 and the population of Trimley St Martin as 1,932. The two villages are immediately adjacent to Felixstowe and identified in the Core Strategy as Key Service Centres due to their extensive range of facilities and proximity to Felixstowe.

6.10 Alternative Option Site 3022a, is situated on the north-western side of the village. It lies to the east of High Road, which runs parallel with the A14, connecting Felixstowe via the A1156 to Ipswich. The south-eastern side of the site abuts the residential properties of Mill Close with extensive allotment gardens lying to the north-east. The western corner of the site contains a group of existing dwellings and buildings used for commercial purposes. Beyond the site to the north-west are arable fields.

6.11 The site was in part submitted and considered under the SHLAA 2014 (site 383a) it was discounted due to concerns regarding vehicle access. Mill Close was not considered to be suitable as an accesses route and the Highway

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Authority was not in favour of direct access from High Road.

6.12 Since 2014 extensive work has been undertaken by Pigeon Investment Management Ltd to overcome the concerns relating to access and demonstrate the sites deliverability. A summary of the work to date is set out below which demonstrates the site's deliverability.

Indicative layout plan

6.13 An indicative layout plan, drawing number 015 - 015 - 00 has been prepared for the site (see Appendix). This shows how the site could be developed to deliver a range of house types including 18 affordable units. The proposed layout demonstrates that the site can deliver housing which respects the surrounding pattern of development. A strong frontage along high Road will provide a connection between the existing settlement and the group of existing buildings to the west of the site. This will be focused around the new highway access which will create an attractive and framed entrance into the development. The internal layout picks up on pedestrian connectivity through to Mill Close providing some additional frontage plots in the eastern corner of the site.

Elsewhere the proposed dwellings and street layout seeks to extend the established pattern of buildings along the site boundaries. Open space and gardens are provided along the north-eastern boundary in order to respect the presence of the allotment gardens. A large area of open space to serve the development (and the existing village) is proposed to the north which will provide a sensitive edge and integration with the open farm land beyond.

6.14 The layout demonstrates that an appropriate density of development can be provided along with a range of house types. The proposed layout can also meet garden space requirements and parking provision while respecting the amenities of adjoining residential properties.

Affordable Housing

6.15 The indicative layout shows the site could include 18 affordable units, including a variety of house types and sizes to meet local need. This will be a significant local benefit.

Heritage Assessment

6.16 The site does not lie with or adjacent to a conservation area and there are no Listed Buildings or other Heritage Assets on or nearby.

6.17 A desk-based assessment of archaeological significance was undertaken in November 2015. This report concludes that there is no evidence that proposed development will have any impact on the significance or setting of designated heritage assets of archaeological interest. It suggests that development could have an impact on the significance of undesignated heritage assets indicated by crop marks but that their significance is unlikely to be sufficient to preclude development and impact on them may be mitigated by the formulation of an appropriate archaeological strategy.

Flood Risk

6.18 The entire site is located within Flood Zone1; land assessed as having a low probability of flooding from fluvial sources. In addition, the site is not identified to be at risk from surface water or reservoir flooding, according to the Environment Agencies Flood Maps for Planning.

6.19 The development will not increase the risk of flooding post development as attenuation measures will be provided on site as part of the proposal to accommodate surface water run-off generated from the critical duration 1 in 100 year event, including an allowance for climate change.

Drainage Strategy

6.20 A preliminary drainage strategy has been prepared for the site which concludes that foul water from the development will be able to flow via gravity to the existing Anglia water sewer located in the High Road.
6.21 In respect of surface water drainage the underlying geology is expected to be of high permeability which will allow surface water run-off to discharge via infiltration. It identifies that an infiltration basin can be provided within the public open space to accommodate surface water run-off from the proposed highway. The surface water from roofs can be discharged via soakaways with permeable paving included to drain the private access roads, parking areas and driveways.

Landscape and Visual Assessment

6.22 A landscape and visual assessment of the site has been carried out and it concludes that there is capacity within the landscape to absorb change.

6.23 It suggest that given the nature, character and visual quality of the existing settlement edge and the poor quality of the existing edges of the site, it has a High Capacity to accommodate change, and the potential to enhance the settlement edge.

6.24 As such there are few constraints or issues in landscape and visual terms that would prevent the site being considered for development.

Preliminary Ecological Appraisal

6.25 A preliminary ecological appraisal has been carried out for the site. Ten habitats were identified during the Extended Phase 1 Habitat Survey including scattered broadleaved and coniferous trees, scattered scrub, poor semi-improved grassland, scattered bracken, tall ruderal, arable, introduced shrub, and species-poor intact and defunct hedgerows. In addition the field margins on-site provide opportunity for common invertebrates, reptiles, birds, and foraging / commuting bats. The report makes a series of recommendations in respect of mitigation measures and good practice during development however, no Phase 2 survey work was required. It is clear that there are no ecological barriers to the

sites development.

S - 7314 - 3949 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

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Transport Report

6.26 Å transport report has been prepared for the site which concludes that the proposed development can be served by an acceptable access to the highway network. The report confirms that the site is located in a sustainable location with bus stops on the boundary providing frequent services and footway connections to local facilities.

6.27 A new access can be provided onto High Road which complies with highway standards and provides adequate visibility and capacity. The existing local infrastructure can support the additional traffic generated, including through the use of more sustainable modes of transport as alternatives to the private motor car, such as cycling, walking and public transport.

6.28 The transport report confirms that access can be provided directly onto High Road and that it will not be necessary to take access via Mill Close as assumed in the assessment of the SHLAA 2014 (site 383a). This therefore overcomes the key reason for the site being discounted due to concerns regarding vehicle access.

7 CONCLUSION

7.1 As set out above and referred to elsewhere in this consultation response Alternative Option Site 3022a is available and deliverable. There are no obstacles to its development and clearly proposals are at an advanced state. The indicative layout confirms that a policy compliant scheme can be delivered which will include market and affordable housing, a large area of open space and improved connectivity.

7.2 As indicated in the landscape and visual assessment, the proposed development will be an attractive addition to the settlement, improving the quality of existing north western edges of the village.

7.3 The site is not in a flood risk area and can be suitably served by both foul and surface water drainage.

7.4 Development of the site will have no impact on designated heritage assets and any impact on undesignated assets can be mitigated. Additionally, there are no ecological barriers to the sites development.

7.5 The site is in a sustainable location with good access to local services and facilities. A new point of vehicle access, which accords with adopted standards, can be provided to High Road overcoming the original reason for the site being discounted in the SHLAA 2014 (site 383a).

7.6 Policy FPP1 of the Felixstowe Peninsular AAP is still working to the Core Strategy target of 7,900 rather than the 11,000 OE figure or an up to date objectively assessed need, as required by Core Strategy Policy SP2. In addition, the current five year supply is not based on an up to date objectively assessed need. It is therefore contended, that the Felixstowe Peninsular AAP should take the opportunity to allocate more sustainable sites that can be delivered in order to meet the requirement of the NPPF to "significantly boost its supply of housing" and assist in the maintenance of a five year supply of housing land.

These sites should allow for variety in house types and tenures to come forward to meet local needs and ensure choice and competition in the market for land (NPPF paragraph 47).

7.7 In conclusion, it is clear that Alternative Option Site 3022a has many advantages over some of the preferred allocation sites and there are no obstacles to it coming forward for development. It is in a sustainable location and could readily deliver much needed housing, including affordable housing, a significant social benefit, with very limited environmental consequences. It does not represent a risk of coalescence and is a natural and logical extension of the settlement with clear and defensible boundaries.

7.8 For the reasons set out above it is clear that Alternative Option Site 3022a should be included as a preferred allocation in the Felixstowe Peninsular AAP.

APPENDICES [see attached documents]

See Attachments to Representation Submission for following documents:

A. Location Plan

B. Indicative Layout Plan

C. Preliminary Drainage Appraisal (October 2015)

D. Desk-based Archaeological Assessment

E. Landscape and Visual Assessment (November 2015)

F. Preliminary Ecological Appraisal

G. Transport Report

H. Phase 1 Contamination Report

Summary:

Site 3022a is in a sustainable location and is not environmentally sensitive. It does not represent a risk of coalescence and is a natural and logical extension of the settlement. It is contained to the north-east by the allotment gardens, by the existing built development in the western corner, the road and established settlement to the south. It is a deliverable site with no obvious constraints or limitations. It is available and could come forward quickly to make a contribution to boosting local

housing supply. It is considered that it should be identified as a preferred residential site allocation.

Change to Plan N/A

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedN/A

Attachments:

Appendix E - FR 3659 Figure 4 Landscape Charcter Assessment.pdf

Appendix H - Phase 1 Contamination Report (Pt2).pdf

S - 7314 - 3949 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

7314 Support

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix H - Phase 1 Contamination Report (Pt1).pdf

Appendix G - Transport Statement (November 2015).pdf

Appendix F - preliminary Ecology Appraisal Trimley.PDF

Appendix E - FR 3659 Figure 5 Photosheets_LR.pdf

Appendix E - FR 3659 Figure 3 Landscape and Heritage Designations and Public Rights of Way.pdf

Appendix E - FR 3659 Figure 2 Statutory Designations(1).pdf

Appendix E - FR 3659 Figure 1 Site Plan with Photo Locations(1).pdf

Appendix D - Trimley St Martin Desk Based Archaeological Assessment.pdf

Appendix C - Prelimiary Drainage Appriasal Oct 15 trimley.pdf

Appendix C - Prelimiary Drainage Appriasal Nov 15 trimley.pdf

Appendix B - Indicative Layout Plan (015-015-002).pdf

Appendix A - Location Plan Trimley.pdf

Appendix E - Landscape and Visual Assessment Summary November 2015.pdf

C - 7317 - 2605 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

7317 Comment

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Respondent: Suffolk Wildlife Trust (Mr James Meyer) [2605] Agent: N/A

Full Text:

RE: Suffolk Coastal DC Site Allocations and Area Specific Policies Local Plan Document Preferred Options Consultation and Felixstowe Area Action Plan Preferred Options Consultation

Thank you for consulting us on the above documents. We have the following comments on the sites identified for allocation (or otherwise) presented in the map booklets and on the settlement boundary changes proposed. These comments are based on a desktop assessment of the sites in relation to the presence of areas designated for their nature conservation value, we have not screened these sites for the potential presence of protected species or the potential presence of Priority species or habitats. It is possible that sites included for allocation could support protected species and/or Priority species or habitats and we recommend that this is investigated in detail as the development plan process progresses.

Site Allocations Preferred Options Document

A number of sites proposed for allocation appear to incorporate areas of semi-natural habitat, for example sites at Westerfield and Witnesham (Chapel). Such sites should not be allocated until their biodiversity value has been established. In addition, policies for all site allocations should ensure that all development delivers ecological gain in accordance with the requirements of the National Planning Policy Framework (NPPF) (section 110).

The document also includes a number of settlement boundary amendments. Whilst we support the redrawing of boundaries to tighten them around existing development, there are a number of settlements where the boundary has been extended to take in new areas for development. Of particular concern are extensions at Bawdsey and Rushmere St Andrew where ecological surveys accompanying recent planning applications have demonstrated that the areas have existing biodiversity value. This evidence should be taken in to account

through the Local Plan process and settlement boundaries should not be amended to take in areas which are of existing biodiversity value.

It is also noted that a settlement boundary is proposed around existing development to the south of Hollesley (Alderton Road/Bushy Lane) which does not currently lie within such a boundary. Designation of such a boundary area would potentially allow further development which may result in an adverse ecological impact. The plan should not allow for development which is likely to result in such impacts.

All site allocation policies should also seek ecological enhancements as part of any new development.

Felixstowe Area Action Plan (AAP) Preferred Options Document

A number of the policies in the draft AAP have negative scores for the biodiversity

Sustainability Appraisal indicator (indicator 17). It is unclear how this will be addressed and a plan should not be put forward which results in an overall negative impact on biodiversity, as such this would not be in conformity with the NPPF. For example policy FPP2 scores negatively on the environmental Sustainability Appraisal criteria and it is unclear how allocation of this site would address this. Paragraph 110 of the NPPF requires that plans should aim to minimise adverse effects on the local and natural environment and should allocate land with the least environmental value.

It is also noted that the draft AAP proposes the allocation of sites in Walton; Trimley St Mary and Trimley St Martin. A number of these sites have previously had ecological surveys carried out on them as part of planning applications which has identified that they have biodiversity value. It is unclear how the policies which are proposed to allocate these sites address this issue. It is also unclear whether the cumulative impact of developing all the proposed sites has been assessed. In accordance with the NPPF (paragraph 110) only land with the least environmental value should be allocated.

A number of the policies in the draft AAP include the following text:

"Suffolk Wildlife Trust have identified that the site is within a Suffolk Wildlife Trust consultation area and any future development on this site will need to ensure that issues can be resolved or mitigated through appropriate design". We do not set 'consultation areas' and are unclear where this concept has come from. We therefore request that reference to this is removed from the AAP. It should also be ensured that where sites are to be allocated, the LPA are certain that "issues can be resolved or mitigated through appropriate design". Where there is uncertainty that biodiversity impacts can be mitigated the site should not be allocated, in accordance with the requirements of the NPPF. The AAP should also seek ecological enhancements as part of any new development.

Green Infrastructure

New development brings increased demand for green space, the evidence for green infrastructure planning in the district is currently underpinned by the Haven Gateway Green Infrastructure Strategy (The Landscape Partnership, 2008) and a Green Infrastructure Strategy (The Landscape Partnership, 2011) for the area within the district outside of the Haven Gateway Area. The site allocations process should be used as a mechanism for the implementation of such strategies. As both of these documents are a number of years old we recommend that as part of the development plan process they are updated and that a single plan is produced to cover the whole district. Such a plan should also take account of green infrastructure in neighbouring districts and boroughs in order to produce a plan at a strategic scale.

Habitats Regulations Assessment (HRA)

The Habitats Regulations Assessment (HRA) of the Site Allocations Preferred Options identifies further work that is required to assess the impacts of several parts of the plan on sites of European nature conservation importance. Such assessment should be undertaken prior to the council's Preferred Options being progressed in order to determine whether they are likely to result in significant adverse effects on such nature conservation sites.

The HRA report discounts potential impacts from a number of the proposed sites as they are perceived to be outside of

C - 7317 - 2605 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

7317 Comment

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

walking distance from a European designated site. However, the study does not appear to take account of travel by car from new developments to European designated sites. Prior to the allocation of any new development sites this factor must be addressed to ensure that development of allocated sites, both alone and in-combination, is not likely to result in adverse impacts on any European designated sites. Unless this matter is

adequately addressed we do not consider that the plan can be demonstrated to be 'sound'.

The HRA of the Council's adopted Core Strategy DPD also identified a number of measures which were required in order to prevent increased recreational pressure from resulting in a likely significant effect on sites of European nature conservation importance. It should therefore be ensured that these measures are incorporated in to the Site Allocations and Felixstowe AAP documents, with the impacts of the proposals within these documents then assessed accordingly. If you require any further information or wish to discuss any of the points raised above please do not hesitate to contact us.

Summary:

It is also noted that the draft AAP proposes the allocation of sites in Walton; Trimley St Mary and Trimley St Martin. A number of these sites have previously had ecological surveys carried out on them as part of planning applications which has identified that they have biodiversity value. It is unclear how the policies which are proposed to allocate these sites address this issue. It is also unclear whether the cumulative impact of developing all the proposed sites has been assessed. In accordance with the NPPF (paragraph 110) only land with the least environmental value should be allocated.

Change to Plan

Appear at exam? Legal? Sound? Duty to Cooperate? Soundness Tests

Not Specified Not Specified Not Specified Nor Specified No

Attachments:

Suffolk Coastal Site Allocations Preferred Options.pdf

C - 7336 - 348 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

7336 Comment

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Respondent: Trinity College Cambridge [348] Agent: Bidwells (Mr Darren Cogman) [1138]

Full Text:

I write in response to the Preferred Options consultation, submitting representations on behalf of my client, Trinity College, Cambridge in respect of Employment Land, and in particular land at Christmasyards Wood, Felixstowe and Innocence Farm, Trimley St. Martin. I attach draft plans to indicate the site's locations. Both sites have previously been subject to discussions with, and technical representations to Suffolk Coastal District Council, Suffolk County Council, etc. as well as some engagement with the relevant Parish Councils.

Planning Context:

The Felixstowe AAP 'Preferred Options' consultation document acknowledges that the adopted Core Strategy (2013) Policy SP5 (Employment Land) considers employment land across the district and makes the distriction between Strategic Employment Areas and General Employment Areas.

The consultation document also acknowledges that employment opportunities across the Felixstowe Peninsula are dominated by the Port of Felixstowe. The New Anglia Strategic Economic Plan (2014) outlines that "Felixstowe is the UK's largest container port, handing 40% of the national container traffic. The Port employs over 2,700 people directly and a further 10,000 jobs are based in related industries." In recent years the Port has undergone significant expansion and investment which has seen improvement to the railway connections and further infrastructure investment continues to enable the Port to handle the latest mega-vessels.

The Core Strategy identifies the Port of Felixstowe as a Strategic Employment Area (SEA) given its contribution to the sub-regional, national and international economies, and states that those employed by the Port or Port related businesses represent 45% of the total workforce in the Felixstowe Area. Its significance is felt beyond the operations within the Port itself, with many businesses, and organisations relying upon the activities of the port for their own operations, such as shipping, logistics, distribution and transport companies.

In this context, the strategic importance of the Port of Felixstowe cannot be understated, with Core Strategy Policy SP5 (Employment Land) stating that the Council will make allocations of at least 8.5 hectares of new employment land within the district

Felixstowe AAP Preferred Policy FPP10: Port of Felixstowe identifies the SEA for the Port of Felixstowe (Policies Map), where land will be promoted and safeguarded for employment, activities and operations which support the retention, expansion and consolidation of the Port of Felixstowe and the jobs associated with the Port. It states that employment proposals which are considered to be of a strategic scale and nature, will be directed to sites within the Strategic Employment Area.

The supporting text to Policy FPP10 acknowledges the locational benefits of proximity to the SEA, and the aim, where possible, to intensify activities within the SEA.

Current Strategic Pressures:

The Port and Trinity's joint hinterland Estate remains under huge pressure, there having been no new green field employment land allocations for third party logistics since the 1990's. In this context Core Strategy Policy SP21 (Felixstowe with Walton and the Trimley Villages) acknowledges that "land is required for portrelated uses such as storage (including laden or un-laden containers) and distribution" (para. 4.38). It also acknowledges that "such land may need to be located away from the Port itself".

The presence of London Gateway, with its extensive distribution park hinterland (560 acres with the potential for 9.25m sq ft of warehousing) remains a potential game changing competitive threat.

The Launch of the 'Port of Felixstowe Logistics Park' initiative at the end of 2014 introduced the potential for some 1.45 million sq ft of warehousing over a 68 acre site within the SEA, but this requires the displacement of approximately 20 acres of long established third party haulage and yard based logistics providers, whose leases terminate in 2016, to sites outside the port estate.

This proposal for the construction of four new B8 distribution buildings, with ancillary office space and gatehouse buildings, provide a total of 83,411 sq.m (GIA) floorspace, and is currently subject to a planning application (Ref. DC/15/2576/FUL) that is expected to be determined (approved) by Suffolk Coastal District Council imminently. Many of the existing site users have unresolved relocation requirements and discussions on behalf of Trinity College have been opened with a view to seeing whether any of these can be accommodated within Trinity's Estate. At the same time, Trinity is also dealing with significant other unresolved accommodation requirements from both existing and new port related occupiers.

Proposed Employment Sites:

With the approval given for the B2/B8 Distribution Warehouse (Uniserve) at Clickett Hill Road, Trinity College has virtually no void space on its current hinterland distribution park and seeks to bring forward, as a matter of urgency, two sites; 27 acre net useable site at Christmasyards Wood, Felixstowe for single

occupancy; And, a 40 acre net useable site at Innocence Farm, Trimley St. Martin for multi occupancy. I attach plans to indicate the locations of these sites. Given the current level of unresolved premises, the number of enquiries received would utilise both of these allocations.

Land at Christmasyards Wood:

The proposed site is located off Fagbury Road West, Felixstowe and extends to approximately 12.71 hectares. As part of the previous promotion of this site, a number of preparatory technical studies were prepared in 2008/2009 to seek to demonstrate that development for a proposed container storage yard could be satisfactorily accommodated.

In acknowledging that the project amounted to 'EIA Development' by virtue of its significance, a Scoping Request was

C - 7336 - 348 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

7336 Comment

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

made to Suffolk Coastal District Council, with the Scoping Opinion received on 3 December 2008. The proposed allocation would extend to approximately 27 acres for use by a single operator as a container storage/haulage yard with access from either Fagbury Road West, or Oysterbed Road.

Land at Innocence Farm:

The proposed site is located to the north of Trimley St. Martin and the A14. It is bounded by the A14 Felixstowe Road to the south and Croft Lane to the east (see attached location plan).

As part of the previous promotion of this site, a number of preparatory technical studies were prepared in 2008/2009 to seek to demonstrate that development for a strategic employment site as a next phase of the Trinity Distribution Park to service the Port of Felixstowe could be achieved at Innocence Farm.

An Engineering Assessment (for a developable area of approximately 85 hectares) appraised a range of matters to include access/egress to the site, on-site construction and earthworks, provision of service utilities, surface water drainage, landscaping measures to minimise/mitigate the impact of development, public rights of way and land ownership.

This report concluded that the site could be satisfactorily developed in principle.

Given the existing significant, commercial pressures from potential tenants, both new and displaced, the initial proposals seek an initial allocation (of approximately 40 acres) for multi-occupier use primarily for haulage and ancillary vard use, but also potentially some warehousing.

Conclusion:

The Port of Felixstowe and Trinity's joint hinterland Estate remains under huge pressure to secure employment land, given that no greenfield employment land allocations for third party logistics have been secured since the 1990s. This position will be exacerbated by the Port of Felixstowe Logistics Park planning application that is expected to be approved imminently.

As the premier UK Port, Felixstowe is critically important to not only the Town but also the District, and region, in the context of the competitive threat from London Gateway.

Previous promotions and the associated technical work undertaken for the proposed employment sites at Christmasyards Wood and Innocence Farm has indicated that both can be delivered, and would address the unresolved premises enquiries experienced.

We trust that the above representations are of assistance in your consideration of Strategic Employment Area issues and look forward to discussing matters further as part of a collaborative partnership approach.

Summary:

The proposed site at Innocence Farm is located to the north of Trimley St. Martin and the A14. It is bounded by the A14 Felixstowe Road to the south and Croft Lane to the east.

An Engineering Assessment (for approximately 85 hectares) appraised a range of matters.

This report concluded that the site could be satisfactorily developed in principle.

Given the existing significant, commercial pressures from potential tenants, both new and displaced, the initial proposals seek an initial allocation (of approximately 40 acres) for multi-occupier use primarily for haulage and ancillary yard use, but also potentially some warehousing.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

Land at Christmasyard Wood and Innocence Farm.pdf

C - 7338 - 348 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

7338 Comment

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Respondent: Trinity College Cambridge [348] Agent: Bidwells (Mr Darren Cogman) [1138]

Full Text:

I write in response to the Preferred Options consultation, submitting representations on behalf of my client, Trinity College, Cambridge in respect of Employment Land, and in particular land at Christmasyards Wood, Felixstowe and Innocence Farm, Trimley St. Martin. I attach draft plans to indicate the site's locations. Both sites have previously been subject to discussions with, and technical representations to Suffolk Coastal District Council, Suffolk County Council, etc. as well as some engagement with the relevant Parish Councils.

Planning Context:

The Felixstowe AAP 'Preferred Options' consultation document acknowledges that the adopted Core Strategy (2013) Policy SP5 (Employment Land) considers employment land across the district and makes the distinction between Strategic Employment Areas and General Employment Areas.

The consultation document also acknowledges that employment opportunities across the Felixstowe Peninsula are dominated by the Port of Felixstowe. The New Anglia Strategic Economic Plan (2014) outlines that "Felixstowe is the UK's largest container port, handing 40% of the national container traffic. The Port employs over 2,700 people directly and a further 10,000 jobs are based in related industries." In recent years the Port has undergone significant expansion and investment which has seen improvement to the railway connections and further infrastructure investment continues to enable the Port to handle the latest mega-vessels.

The Core Strategy identifies the Port of Felixstowe as a Strategic Employment Area (SEA) given its contribution to the sub-regional, national and international economies, and states that those employed by the Port or Port related businesses represent 45% of the total workforce in the Felixstowe Area. Its significance is felt beyond the operations within the Port itself, with many businesses, and organisations relying upon the activities of the port for their own operations, such as shipping, logistics, distribution and transport companies.

In this context, the strategic importance of the Port of Felixstowe cannot be understated, with Core Strategy Policy SP5 (Employment Land) stating that the Council will make allocations of at least 8.5 hectares of new employment land within the district

Felixstowe AAP Preferred Policy FPP10: Port of Felixstowe identifies the SEA for the Port of Felixstowe (Policies Map), where land will be promoted and safeguarded for employment, activities and operations which support the retention, expansion and consolidation of the Port of Felixstowe and the jobs associated with the Port. It states that employment proposals which are considered to be of a strategic scale and nature, will be directed to sites within the Strategic Employment Area.

The supporting text to Policy FPP10 acknowledges the locational benefits of proximity to the SEA, and the aim, where possible, to intensify activities within the SEA.

Current Strategic Pressures:

The Port and Trinity's joint hinterland Estate remains under huge pressure, there having been no new green field employment land allocations for third party logistics since the 1990's. In this context Core Strategy Policy SP21 (Felixstowe with Walton and the Trimley Villages) acknowledges that "land is required for portrelated uses such as storage (including laden or un-laden containers) and distribution" (para. 4.38). It also acknowledges that "such land may need to be located away from the Port itself".

The presence of London Gateway, with its extensive distribution park hinterland (560 acres with the potential for 9.25m sq ft of warehousing) remains a potential game changing competitive threat.

The Launch of the 'Port of Felixstowe Logistics Park' initiative at the end of 2014 introduced the potential for some 1.45 million sq ft of warehousing over a 68 acre site within the SEA, but this requires the displacement of approximately 20 acres of long established third party haulage and yard based logistics providers, whose leases terminate in 2016, to sites outside the port estate.

This proposal for the construction of four new B8 distribution buildings, with ancillary office space and gatehouse buildings, provide a total of 83,411 sq.m (GIA) floorspace, and is currently subject to a planning application (Ref. DC/15/2576/FUL) that is expected to be determined (approved) by Suffolk Coastal District Council imminently. Many of the existing site users have unresolved relocation requirements and discussions on behalf of Trinity College have been opened with a view to seeing whether any of these can be accommodated within Trinity's Estate. At the same time, Trinity is also dealing with significant other unresolved accommodation requirements from both existing and new port related occupiers.

Proposed Employment Sites:

With the approval given for the B2/B8 Distribution Warehouse (Uniserve) at Clickett Hill Road, Trinity College has virtually no void space on its current hinterland distribution park and seeks to bring forward, as a matter of urgency, two sites; 27 acre net useable site at Christmasyards Wood, Felixstowe for single

occupancy; And, a 40 acre net useable site at Innocence Farm, Trimley St. Martin for multi occupancy. I attach plans to indicate the locations of these sites. Given the current level of unresolved premises, the number of enquiries received would utilise both of these allocations.

Land at Christmasyards Wood:

The proposed site is located off Fagbury Road West, Felixstowe and extends to approximately 12.71 hectares. As part of the previous promotion of this site, a number of preparatory technical studies were prepared in 2008/2009 to seek to demonstrate that development for a proposed container storage yard could be satisfactorily accommodated.

In acknowledging that the project amounted to 'EIA Development' by virtue of its significance, a Scoping Request was

C - 7338 - 348 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

7338 Comment

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

made to Suffolk Coastal District Council, with the Scoping Opinion received on 3 December 2008. The proposed allocation would extend to approximately 27 acres for use by a single operator as a container storage/haulage yard with access from either Fagbury Road West, or Oysterbed Road.

Land at Innocence Farm:

The proposed site is located to the north of Trimley St. Martin and the A14. It is bounded by the A14 Felixstowe Road to the south and Croft Lane to the east (see attached location plan).

As part of the previous promotion of this site, a number of preparatory technical studies were prepared in 2008/2009 to seek to demonstrate that development for a strategic employment site as a next phase of the Trinity Distribution Park to service the Port of Felixstowe could be achieved at Innocence Farm.

An Engineering Assessment (for a developable area of approximately 85 hectares) appraised a range of matters to include access/egress to the site, on-site construction and earthworks, provision of service utilities, surface water drainage, landscaping measures to minimise/mitigate the impact of development, public rights of way and land ownership.

This report concluded that the site could be satisfactorily developed in principle.

Given the existing significant, commercial pressures from potential tenants, both new and displaced, the initial proposals seek an initial allocation (of approximately 40 acres) for multi-occupier use primarily for haulage and ancillary vard use, but also potentially some warehousing.

Conclusion

The Port of Felixstowe and Trinity's joint hinterland Estate remains under huge pressure to secure employment land, given that no greenfield employment land allocations for third party logistics have been secured since the 1990s. This position will be exacerbated by the Port of Felixstowe Logistics Park planning application that is expected to be approved imminently.

As the premier UK Port, Felixstowe is critically important to not only the Town but also the District, and region, in the context of the competitive threat from London Gateway.

Previous promotions and the associated technical work undertaken for the proposed employment sites at Christmasyards Wood and Innocence Farm has indicated that both can be delivered, and would address the unresolved premises enquiries experienced.

We trust that the above representations are of assistance in your consideration of Strategic Employment Area issues and look forward to discussing matters further as part of a collaborative partnership approach.

Summary:

In acknowledging that the project amounted to 'EIA Development' by virtue of its significance, a Scoping Request was made to Suffolk Coastal District Council, with the Scoping Opinion received on 3 December 2008.

The proposed allocation at Christmasyards Wood would extend to approximately 27 acres for use by a single operator as a container storage/haulage yard with access from either Fagbury Road West, or Oysterbed Road.

Previous promotions and the associated technical work undertaken for the proposed employment sites at

Christmasyards Wood and Innocence Farm has indicated that both can be delivered, and would address the unresolved premises enquiries experienced.

Change to Plan

Appear at exam?Legal?Sound?Duty to Cooperate?Soundness TestsNot SpecifiedNot SpecifiedNot SpecifiedNot SpecifiedNone

Attachments:

Land at Christmasyard Wood and Innocence Farm.pdf

C - 7395 - 3954 - Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map - None

7395 Comment

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Appendix 7: Felixstowe, Trimley St Mary & Trimley St Martin Inset Map

Respondent: Savills (UK) Limited (Mr Andy Redman) [3954] Ν/Δ Agent:

Full Text:

We write on behalf of the landowners of this 1.03 ha site at High Road, Trimley St. Martin, Suffolk. Please find enclosed a plan outlining the land referred to as identified in the SHLAA as Site 383B.

We are concerned with the soundness of the proposed Felixstowe peninsular Area Action Plan (AAP) and the AAP's failure to allocate suitable sustainable sites. In particular the AAP fails to take the opportunity to allocate additional land at Trimley St. Martin in accordance with the development strategy set out in the core

strategy, which seeks to meet the "minimum locally identified housing needs of the district for the period 2012 to 2027". As is evident from the attached plan the site abuts the village boundary, the site in question is sustainable and is suitable for development. In accordance with the presumption in favour of sustainable

development and the need to boost the supply of housing we propose that it should be included as an allocation. Further to the above, Suffolk Coastal District Council published a housing supply land assessment in June 2015 for the period 1st April 2016 to 31st March 2021. It assessed the current five year supply (+ 5%) supply of housing land to be 5.12 years. This assessment is still based on the core strategy target of 7,900 residential units. This is an acknowledged under estimate of the actual objectively assessed need which in the absence of anything more up to date, on the best evidence currently available, potentially suggests a target in the region of 11,000 dwellings.

The Felixstowe potential AAP identify a number of sites as preferred option allocations. In total the AAP suggests that these could deliver 1,135 dwellings between them. However we would consider that a number of these sites are not well advanced. Accordingly in order to maintain a realistic five year supply, it will be important for the District to deliver a number of smaller sites which can readily come forward. The subject site offers an ideal opportunity for this purpose.

affordable housing.

Trimley St. Martin lies to the west of Felixstowe, between the A14 to the north-east and the railway line to the southwest. The village of Trimley St. Mary lies immediately to the south-east separated by a small gap. The two villages are immediately adjacent to Felixstowe and identified in the Core Strategy as key service centres due to their extensive range of facilities and proximity to Felixstowe. When considering the Trimley villages and the opportunities for further allocations, Trimley St. Mary is the larger of the two settlements and any

significant further expansion may potentially undermine the sustainability of it as a village. Trimley St. Martin, being the smaller of the two settlements, would appear to have greater capacity to absorb further growth.

Trimley St. Mary is also constrained by its proximity to Felixstowe, the AONB designation to the south-west, the A14 to the north-east and its proximity to Trimley St. Martin to the north. There are therefore few obvious alternative locations for the expansion of its physical development limits. On this basis there is considerably more potential to look at a further extension of the physical development limits of Trimley St. Martin.

In terms of the site itself, it is in close proximity to the central facilities of the village and with easy access to both employment opportunities and good public transport facilities. In addition given the scale of any development of the land, it seems reasonable to consider that suitable access can be readily delivered off the

existing road network. Conversely, should the site be brought forward alongside neighbouring land to the north, then this would offer further access opportunities.

With the adjacent Mushroom Farm development now proceeding and the allocation of site 451b within the AAP there appears to be an evolving predecent in urban form for development to extend to a limited depth to the west of High Road along its length through both Trimley St Mary and St Martin. The subject site is the only 'gap' in proposed development along the western side of High Road and there appears to be little substantial reasoning to support this. The site has many similar characteristics to Sites 451a and 451b appearing in the AAP in location and transportation terms and the lack of a favourable assessment of the site based on identical criteria is not understood. It is clear that the site has many advantages over some of the preferred allocations and there are no known obstacles to it coming forward for development. It is a sustainable location and could deliver much needed housing, including

Accordingly we consider that the site or at the very least, a part of the site fronting High Road, should be included on the basis that it is both a sustainable and available site. In line with this comment we believe the site should be identified within the AAP, either as an additional allocation site or as a reserved site."

We trust that the above is self explanatory and will be given full consideration by the Council in the ongoing AAP preparation. In the meantime please confirm receipt of these representations

Summary:

The 1.03 ha site at High Road, Trimley St. Martin, as identified in the SHLAA as Site 383B has many similar characteristics to Sites 451a and 451b appearing in the AAP in location and transportation terms and the lack of a favourable assessment of the site based on identical criteria is not understood.

It is clear that the site has many advantages over some of the preferred allocations and there are no known obstacles to it coming forward for development. It is a sustainable location and could deliver much needed housing, including affordable housing.

None

Change to Plan

Appear at exam? Legal? Sound? **Duty to Cooperate? Soundness Tests** Not Specified Not Specified Not Specified Not Specified

Attachments:

Land at High Rd, Trimley St Martin.pdf