

Trimley St Martin Parish Council: Representations on the Final Draft of the Local Plan

Policy SCLP12.66 Land Adjacent to Reeve Lodge

Failure to Justify

1. This policy includes land for 150 houses in addition to new premises for the village school and much needed open space. The concern here is with the housing allocation. The village is already facing a huge amount of development - detailed below - and no evidence has been provided to demonstrate a need for a further 150 houses on top of the existing allocations:
 - policy SCLP12.65 is an allocation of land for up to 360 dwellings carried forward from the Felixstowe Peninsula Area Action Plan,
 - planning permission is already in place for two developments, each of 70 dwellings, on land off the High Rd (DC/16/2119/OUT and DC/16/1919/FUL).
2. There are now approximately 1000 dwellings in the village, but, with the existing allocations and permissions listed above, it is apparent that that the village is already faced with growth of approximately 50%. Despite the impression given in Appendix D of the local plan, this is not growth spread over many years to come - the owner of the land allocated for 360 dwellings has already initiated local consultation and indicated that they plan to apply for planning permission this year with a view to building out the site over a period of 3 – 5 years <https://www.trimley-howlettway.co.uk/>.
3. With so much land already allocated for housing there is no justification for allocating more. This is borne out by the District Council's own comment at Appendix A of the Plan in which they remark that there is a possibility that the landowner will not bring the site forward, although:

"If landowners do not bring this site forward, there will still be sufficient housing delivered as the Local Plan has over-allocated, provided the majority of other allocations are delivered."
4. In response to comments on the Issues and Options document, Suffolk Coastal District Council argued that the additional housing at the Reeve Lodge site would be required to help support the cost of a new school. This assertion fails to take account of the fact that the move of Trimley St Martin Primary School to a new building would free up the land on which the school is currently situated. This site does not feature in the draft local plan, but we understand that the County Council intend to sell the land when the school moves and thus one would expect that the proceeds of sale would represent a significant contribution towards the cost of the new building together with contributions which would be forthcoming from other developments. It follows that the housing allocation on the Reeve Lodge site is not justified by a need to facilitate the construction of new school premises.

Inconsistent with National Policy

5. The National Planning Policy Framework states that housing should be located where it will enhance and maintain the vitality of rural communities, but what we see here is a policy which risks swamping our community rather than enhancing it. It follows that the policy is inconsistent with national policy. Given the vast scale of development proposed for Trimley

St Martin, to build a further 150 houses adjacent to Reeve Lodge would also be inconsistent with Policy SCLP5.1 of this plan which refers to residential development being permitted where it is “of a scale appropriate to the size, location and character of the village.”

Failure to Deliver an Effective Plan

6. A sound plan should be deliverable over the plan period, but there is clear evidence to suggest that this plan is not deliverable without significant improvements to the infrastructure. A major difficulty is that the impact of individual policies is considered in isolation and there is no clearly stated commitment to the steps necessary to facilitate delivery of the whole package. On a village scale the impact of SCLP12.66 cannot be considered in isolation from SCLP12.65 (360 dwellings off Howlett Way) or the developments off the High Rd. The impact on local roads of these proposals has been disregarded. It is intended that the new school site will be accessed off the small roundabout at the end of Howlett Way, but the impact of the volume of traffic which this would generate, when coupled with an increase in housing in the village of over 50%, has not been addressed. Similarly, the demand for parking by those dropping children off at school has been disregarded. As it stands this policy cannot be delivered.
7. Looking at the package of development proposed for Trimley St Martin in a wider context, the extent to which the A14 is tested by the amount of traffic which it carries at present has not been given due consideration. If all the development proposed for Felixstowe and the villages were to go ahead congestion would be a serious problem and enhancements would be needed. When the A14 is closed for repairs, the traffic is diverted through Trimley St Martin which is an extremely unpleasant experience for those living close to the High Road. The diversion was in force for several months over the winter of 2017/18 and again for a shorter period during the Autumn of 2018. As enhancement works necessary to increase capacity would almost certainly involve some periods of closure it follows that there should be clearly stated plans for this to be done before any extensive development is undertaken.
8. This policy provides for a new primary school, but includes no provision for an additional community meeting place – given the huge increase in the population which would be brought about by the combination of all the developments planned for the village this is a serious oversight. Community facilities in the village are currently running at capacity. It is not realistic to assume that the new school building could meet this need as additional facilities are required which can be used during the day, as well as in the evening and at weekends.
9. The Cross Boundary Water Study comments with regard to waste water treatment (ref SCDC 96) that there would be a need for further assessment within the life of the plan. The same point is made about policy SCLP12.65 (Land off Howlett Way) The reality of the situation is apparent to local residents who are all too aware that the sewerage system is already taxed to the limit and that, in January of this, there was a significant problem with at Thurman’s Lane when the capacity of the system was exceeded by the demand. The plan cannot be considered deliverable unless and until it contains a clear statement of the improvements which will be carried out to enable waste water to be treated.

Changes Necessary to Make this Policy Sound

- a) Remove the provision for housing on the site;
- b) Include provision for a community meeting place, separate from school facilities and not dependent upon a housing allocation on this site;

- c) Provide confirmation that air quality standards are met for this site;
- d) If air quality standards are met under current conditions, provide projections to show whether air quality is likely to continue to be compliant in the face of the increased traffic associated with all new development in the village and with the increased freight traffic which will be carried on the Felixstowe branch line when the passing loop has been completed;
- e) Include a requirement for adequate parking provision for parents who drive their children to school;
- f) Assess whether local roads can cope with the traffic demand arising from the school in combination with new housing developments;
- g) Establish that the waste water needs of the site can be accommodated.

SCLP12.35 Innocence Farm

The comments of Trimley St Martin Parish Council are set out below. In addition the Parish Council has contributed to the detailed response of the Cross Boundary Parish Council Group on this policy and those detailed comments have been submitted separately.

Justification

1. There is no evidence to show that a site of this size is required for port related use. Agents acting for the landowner have indicated that one intended use arises from the need to accommodate hauliers displaced from Felixstowe where land is needed for port centric operations, but there is no reason to suppose that those who have lost facilities in Felixstowe could not be accommodated on some of the brown field sites already available near to the port.
2. The policy has not taken account of the reasonable alternatives. The proposal to identify Innocence Farm as a suitable location is supported by Lichfield's 'Port of Felixstowe Development Needs Study' which includes an evaluation of eight different sites. Unfortunately the evaluation is badly flawed and does not bear close examination. The following points are of particular concern:

Six items are assessed out of a score of 5 making a potential maximum score of 30 for the ideal site. This is a questionable approach as the decision to rate each characteristic out of 5 suggests that each characteristic is of equal importance which it is not.

 - A. Proximity to the port, which is presented elsewhere as a factor of major significance is not one of the characteristics evaluated except insofar as all sites are located between the port and the Orwell Bridge.
 - B. The question of whether a site is situated west or east of the A14 seems not to have had any bearing on the score awarded for strategic road access.
 - C. When assessing site ownership and availability (item h) it appears that 0 or 5 are the only possible scores. On the face of it, 5 is awarded where the site has been put forward by the owner for port related use, all other sites score 0. There are two main difficulties with this:
 - i. The site numbered 8 in the evaluation, "Land north west of Walk Farm, Levington", is shown as a 33.1 ha site which has been awarded a 0 score on the site ownership scale, whereas site 9, 'land adjacent to Seven Hills' scores

5 on the ownership scale. If one looks at the Issues and Options document it becomes apparent that sites 8 and 9 are at opposite ends of what was listed there as site 347 with a size of 90.2 ha, and originally put forward for port related use. Savills responded to the Issues and Options consultation last year on behalf of the landowner, Stratton Hall Farms Ltd. In the light of their comments (below) on that part of site 347 which is now represented by the consultants as site 8 it is impossible to see how was the ownership score of '0' arrived at.

"The allocation of part of site 347 is supported and identified within these representations as site 347a (see Appendix 1), as a significant and beneficial contributor to employment and economic growth in the District. Whilst it is expected that demand would primarily be derived from transport and logistics and also warehousing, it is suggested that the allocation should not be unduly restrictive. The site would be suitable for a broad B use class allocation."

- ii. Note also that site 7, which is a small part of a site which appeared in the Issues and Options document as site 288, scored 0 on the land ownership scale, but nevertheless achieved a total of 19 in the matrix. As it seems that this site is also supported by the landowner for port related purposes, one would have expected a score of 24 - the highest of all the options. Savills, acting on behalf of the landowner Stratton Hall Farms Ltd, commented on this site in response to the Issues and Options consultation last year saying that the site would be suitable for a broad B class allocation.

- D. Christmasyard Wood, which has previously been thought a good option, close to the port and convenient for the A14, seems now to be considered less suitable on the basis that there would be significant infrastructure requirements. In the appraisal matrix the site scores 20 out of 30 as compared with the Innocence Farm score of 23. Within that total, it scores 3 for strategic road access whereas Innocence Farm somehow contrives to scores a full 5 despite the huge infrastructure requirements described below.

Failure to deliver an Effective Plan

- 3. The policy is not deliverable over the life of the plan. Policy SCLP12.35 makes it clear that vehicular access to the site is needed in both an easterly and westerly direction. There is some limited additional access information in Appendix B to the report where it is explained that it would be critical to the development to provide "significant access and footway improvements and improvements to the wider network". No cost is mentioned and the reader might be misled into assuming that the requirement could be met by some fairly simple intervention. This is not the case. Existing access to the site is via a left in/left out junction off the A14. The junction has a very short run off and connects with a narrow country lane. Dealing with this junction in itself would require major roadworks, but the greater challenge would come with the changes necessary to provide vehicular access from both an easterly and a westerly direction as these would necessitate installing a bridge or an underpass to enable traffic to cross the A14. The cost of this undertaking would inevitably run into many millions of pounds, but there is nothing in the plan to indicate that Suffolk County Council or Highways England have indicated any preparedness to contribute to this massive project.

4. The policy suggests that there might be an opportunity for the site to be linked to a rail head on the Felixstowe to Ipswich branch line. This is wholly unrealistic given that the line will be taken to capacity following completion of the Felixstowe Branch Line project to provide a 1.4 kilometre passing loop to support the port with up to 10 additional freight trains each way. On completion the additional capacity will be taken up by the port and there will then be no further spare capacity available.

Not Positively Prepared

5. The expectations of jobs arising out of this policy are high, with transport modelling based on 3,062 jobs, (Forecasting report vol 2 para 3.4.41). Had this been a realistic calculation one could argue that the plan aimed to meet the employment needs of the District. As it is, the number of jobs which the site is expected to support has not been explained or justified. Given that total Ipswich Economic Area Sector Needs Assessment Final Report suggests that 960 new jobs in transport and logistics across the district as a whole, for the entire period covered by the plan, it appears that the figure of 3,062 is exaggerated. Indeed, it has the appearance of having been arrived at by applying a formula for B8 employment to the entire land area rather than to the limited amount of space which it is intended will be specifically allocated for warehouse use.
6. The Port of Felixstowe is of great importance to the peninsula, but a positively prepared report would reflect the fact that the impact of automation is likely to significantly reduce job opportunities in this sphere. It follows that in order to be positively prepared the plan must be realistic and it must also look to the need to provide for a diverse range of employment opportunities.

Inconsistent with National Policy

This policy does not support the delivery of sustainable development.

7. The impact of the policy on the local environment is likely to be considerable. This is not a broad-based allocation of employment land, it is an allocation for a particular purpose. As that purpose is known, it is equally clear that some of the environmental issues will be known. Although a full environmental impact assessment would not be expected at this early stage, some basic modelling should have been undertaken to look at air, soil, light, and sound pollution, not all of which can be addressed by bunding. The landowners have indicated that they expect the site to be visited by up to 3,200 HGVs per day and that operations will take place around the clock. In the circumstances, there is no evidence that this site could be developed sustainably. To proceed with the policy without any assurance in place would be extremely unfair to those living on the periphery of this site who would have to live with great uncertainty as to what the future holds.