

Policy SCLP12.62 Land Adjacent to Reeve Lodge, High Rd, Trimley St Martin

1. Policies contained within the Felixstowe Peninsula Area Acton Plan mean that the village is already facing a huge amount of development; to add a further 150 houses would be an unreasonable and unnecessary imposition. Trimley St Martin is a village not a suburb but, as more and more of the farmland is built upon, its identity is in serious danger of being lost. The fact that this site is currently being used as a **temporary** compound to support the Network Rail works, does not establish it as a suitable target for development.
2. Many local people are extremely distressed by the extent of the development contained within established policies, to add a further large development is inexplicable and wholly unnecessary.
3. The traffic implications of development in this location have not been thought through. Pressure on the roundabout at the end of Howlett Way has already increased following the construction of the Cavendish Grove estate. This very small roundabout already serves four roads, to add a fifth providing access to a school and new housing would place an impossible burden on the existing provision.
4. More broadly, no local highways solutions have been suggested to any of the traffic problems which would be occasioned by development of sites which have already been allocated. In the absence of coherent and realistic plans to address these issues, the suggestion that the village should accommodate yet more housing is plainly unworkable.
5. If new housing is needed on the peninsula it must be distributed more equitably and infrastructure put in place to accommodate the demands being made upon it.
6. The Parish Council welcomes provision for a new primary school, but regard this site as a less suitable location than Howlett Way. As a location Howlett Way would be preferred because:
 - It is a wider road and access would be easier and parking problems fewer;
 - The need for a school will soon become urgent and it is understood that Howlett Way is likely to be developed first;
 - Many parents drive their children to school and then go on to work via the A14. To locate the school on the land next to Reeve Lodge would encourage drivers to follow the High Rd through the village and pick up the A14 via the slip road at the end of the High Rd, conversely, to locate the school at Howlett Way would be more likely to encourage parents to access the A14 at junction 59 thereby saving the village from avoidable traffic flow.
7. The Parish Council also welcomes provision for open space included in this policy. The need for this is already established and should not be made contingent upon the provision of yet more housing.
8. There is unmet need for additional indoor meeting and leisure facilities within the Parish as the Memorial Hall is being used at or close to capacity, but this draft policy does nothing to address this need. The Memorial Hall is currently being used at close to capacity, any additional housing will bring an urgent need for further provision.
9. The Parish Council wishes to be assured that the Clinical Commissioning Group can provide sufficient GPs within the locality to ensure safe doctor: patient ratios before **any** further house building is undertaken.

Policy SCLP12.30: Land at Innocence Farm

10. There is no evidence to show that a site of this size is needed for port related use. According to the Port of Felixstowe Growth and Development Needs Study, commissioned by SCDC, future needs could be met with 67ha (mid growth scenario) But this 67ha does **not** need to come from a newly identified source; as the consultants point out, “the existing pipeline supply of employment land that is in close proximity to the Port of Felixstowe and considered suitable for port-related activities totals just over 67 ha. This quantum would be sufficient – in quantitative terms – to accommodate the low and central case growth scenarios, while additional land would be required to meet the high growth case in full.”
11. The proposal to identify Innocence Farm as a suitable location is supported by the consultants’ evaluation of eight different sites but, this 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, and 2 for local accessibility as compared with the Innocence Farm score of 3.
- e. Although there are obvious access problems associated with the Christmasyard Wood site it does seem that these are not major concerns of the landowners who, through Bidwells, are currently testing the water with an advertisement for part of the site <https://propertylink.estatesgazette.com/property-details/6079819-christmasyards-wood-fagbury-road-west-felixstowe-ip11-0ud> In this context they seem rather more optimistic than the consultants and describe the location in the following very favourable terms :

Commercial Development site for Port related uses. Adjoining the Port of Felixstowe and Trinity Distribution Park with easy access to the A14. Potential use to include B1, B2 and B8 Potential rail access with close proximity to existing railheads. **Location** Adjoining the Port of Felixstowe and Trinity Distribution Park with easy access to the A14 junction 60 and Dock Gate No2. **Energy Performance Certificate** N/A

12. The difficulties that would be experienced in providing suitable road access to Innocence Farm are acknowledged in the report, but, astonishingly, they are not presented as though they would offer any great difficulty.
13. Warehousing jobs are extremely sensitive to automation and thus inadequate justification is provided for the claim that significant new employment opportunities will arise from the development of the land for port related purposes.

Environmental Impacts

14. The policy is extremely vague. Beyond saying that this site is to be used for port related purposes, exactly how it is to be used is left open in the interests of 'flexibility'. How the site is to be accessed by HGVs using 'dedicated routes' from both East and West without creating an intolerable impact on the local community is not described.
15. The idea of making a connection with the railway line is unlikely to be achievable. The possibility of making such a connection seems not to have been discussed with Network Rail, nor do the Highways issues appear to have been discussed in any detail with SCC Highways or Highways England.
16. In the Parish Council's response to the Issues and Options document the Parish Council made very clear that there was a need to look at these issues **before** entertaining the site for use for port related purposes. Without repeating all the comments made at that time the main factors which must be considered are

- Air pollution
 - Light pollution from 24 hour working
 - Noise pollution
 - The impact on residents living close to the site
 - The impact on children attending the local school which is just yards away from the site
 - The impact on children travelling past the site on the way to High School
 - The proximity to a playground and playing field
 - Property blight going forward for a possible 20 years
 - Impact of the loss of good quality farm land. In this connection note that National Planning policy (para 112) requires that “Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.”
 - Impact on wildlife
17. Mention is made of the provision of landscaping and buffers as though this would provide full protection against all the sources of pollution, but the detail not described. Without a clear statement explaining the type of protection which will be put in place, local people cannot have any confidence that their interests will be protected - much more detail is needed before a clear idea of the potential impact can be gleaned and this work needs to be done now. Residents cannot be expected to endure 20 years of uncertainty.
18. Finally paragraph 12.241 of the local plan suggests that at some point Innocence Farm might be utilised to assist delivery of energy infrastructure. The Parish Council understands this to mean that the site might be considered for freight handling during the construction of Sizewell C. This seems to be an unsuitable use – there must be sites located closer to Sizewell – and suggests that there is a determination to find an employment related application for the site however inappropriate that may be.

