

## **Issues and Options for the Suffolk Coastal Plan Review**

The Planning Committee of Trimley St Martin Parish Council considered the Issues and Options document at their meeting on 17 October. This is their response to the document.

### **Introduction**

1. The Parish Council welcomes the opportunity to comment on this document and recognises that it represents an exploration of the issues and options and that the comments of respondents will inform the first draft of the revised plan. Although it is accepted that errors can be corrected, and that there will be further opportunities to comment when the draft local plan is issued for consultation in February, some anxiety could have been saved if checks had been made before long forgotten sites were included alongside those put forward very recently. Details of the site errors identified by this Parish Council are set out at the beginning of the answer to question 143 in the table below. In addition, the error in the table on page 42 of the document, in mistakenly including the Trimley villages with Felixstowe, for the purposes of Option 5, may well have created unnecessary difficulties for those on the peninsula trying to form a view of the relative impact of options 4, 5 and 6.

### **Questions Considered**

2. Some of the key questions have already been addressed in broad terms through the 1-2-1 meeting held earlier in the month. The focus then was on the needs of the community with particular reference to infrastructure.
3. The points put forward at the 1-2-1 meeting with planners are set out below. Answers to other numbered questions considered by the Parish Council Planning Committee appear in the table at paragraph 5 below:
  - The community needs to retain what remains of its rural character.
  - There is a need for improved infrastructure; traffic on the High Road has increased and other traffic options needed to be considered.
  - More community facilities for clubs would be welcomed as would dedicated play space for children.
  - The school is operating at capacity and additional provision needed to be made.
  - It is imperative that adequate provision is made to the sewerage system in order that it can cope with the demands of any new housing.
  - Local people need local jobs; land for employment purposes on the peninsula should not be considered solely in terms of port related use which, given the high levels of automation, might not generate significant numbers of jobs.
4. An additional point on the broad infrastructure questions is that greater emphasis needs to be put on planning of road/access infrastructure as an integral part of any planning application that will deliver multiple houses. More and more houses are being squeezed onto the peninsula; the scale of delivery has gone beyond small incremental change and reached the point where a clear, well researched and workable traffic plan must be presented for consideration as a first requirement within the planning process.

5. For ease of reference answers to specific, numbered questions contained within the Issues and Options document are set out in the table below:

<u>No</u>	Question and Answer
2	<p><b>Q. What are the advantages of your area which should be protected through the local plan?</b></p> <p>A. The village has an AONB within its borders; this must be protected along with the adjoining rural landscape and the rights of way. A considerable amount of land along the High Road has been allocated for building, some building has taken place, some is still awaiting completion of 106 agreements, but the end result will be the loss of a considerable amount of green space. To preserve what remains along the High Road is of paramount importance – Trimley St Martin is a village not a suburb, its rural character is not always readily apparent to those passing through by road, but it is a very important feature for local people who place great value on their quiet lanes and footpaths.</p>
6	<p><b>Q. Which of the growth scenarios A,B or C outlined across pages 19 to 21 should be planned for?</b></p> <p>A. The evidence for Suffolk Coastal would suggest that a low growth scenario should be planned for. The primary aim should be to build to meet the needs of the community; much new building is of properties which are significantly too expensive for local people to buy.</p>
8	<p><b>Q. Would communities be prepared to accept more growth if that meant new or enhanced infrastructure could be provided?</b></p> <p>A. No, existing allocations already allow for a considerable amount of building in the village. Infrastructure needs will arise out of this, not least being the need for a new school. Meeting infrastructure needs associated with existing allocations should be automatic and not contingent upon accepting ever more growth.</p>
13	<p><b>Q. Which of the are three distribution options for Suffolk Coastal would be most appropriate?</b></p> <p>Option 4 places 26% of housing growth in Felixstowe and the Trimleys. It may be that the unexpected outcome with regard to Candlet Road, Felixstowe will fully meet the need for option 4 scenario A, but there is a danger that if this does not go ahead then this parish might be asked to take additional housing over and above the numbers committed to as of March 2017. Land in Trimley St Martin already allocated within the Felixstowe Peninsula Area Action Plan includes FPP6 Land Opposite the Hand in Hand (70 dwellings) and FPP7 Land off Howlett Way (approx 360 dwellings). In addition account must be taken of the separate Pigeon Development site (DC/16/1919/FUL) which is on land not allocated in the FPAAP. Put together these allocations <b>already</b></p>

	<p>represent an increase of around 50% in the number of dwellings currently in Trimley St Martin.</p> <p>This village cannot reasonably be expected to accommodate any additional growth and with that in mind it may be considered desirable to share the burden more equitably within the district through either option 5 or option 6.</p>
17	<p><b>Should the policy approach of maintaining the physical separation of villages from Ipswich be continued or should infill in gaps between settlements be considered as a source of housing land?</b></p> <p>The principle of maintaining the physical separation between settlements is an important one which should be maintained.</p>
32	<p><b>Is there a need for additional educational provision in certain areas of the HMA and if so what is the need and where?</b></p> <p>A. Yes. Trimley St Martin Primary school is at capacity, but existing housing allocations are such that additional provision will have to be made. The journey to school is not a straightforward one as pupils have to cross the A14 bridge to reach the premises with the consequence that parents driving children to school has become commonplace. Even with present numbers Kirton Road becomes seriously congested at the start and end of the school day. A new school is needed to meet the needs of the community.</p>
39	<p><b>Q. Is the existing affordable housing policy coverage and scope sufficient? Do you have any suggestions for what else might be included in a comprehensive approach to affordable housing?</b></p> <p>A. The existing provision is insufficient and quotas seem not to be always fully enforced. The time may be right to start building council housing again rather than relying on the affordable housing % approach.</p>
40	<p><b>Q. Where provision for affordable housing on an exceptional site is supported by, and can be shown to meet the needs of that local community, should planning policy be sufficiently flexible to allow for this?</b></p> <p>A. Building on land which is not an allocated site within an approved local plan should be done only where a clear local need exists and the community has been consulted and approved the special arrangements.</p>
63	<p><b>Q. Should the local plan allocate more land than is required for employment use or should we only allocate what is needed?</b></p> <p>A. No, and certainly not where the land is in the immediate vicinity of housing. In these circumstances the risk of blight continuing over the life of the plan, in the service of an unconfirmed need, would impose a wholly unfair burden on residents.</p>

89	<p><b>Q. Is the need for and importance of vehicle parking sufficiently reflected in existing planning policies?</b></p> <p>A. No, planning policies do not make enough provision for parking. A realistic allowance needs to be made for residents and visitor parking. In addition, where a development results in the loss of a stretch of kerbside parking, additional provision is needed to replace all that has been lost and add more. There needs to be recognition that existing parking provision is inadequate, particularly in areas where properties were built before the age of car ownership, and that new developments present an opportunity to help address these problems.</p>
90	<p><b>Q. Should we continue to protect all existing community services and facilities?</b></p> <p>A. Yes, facilities must be protected and where development is taking place there will be a need to expand services to take account of the needs of the increased population.</p>
134	<p><b>Q. Should areas of tranquillity be identified and protected and if so, which areas should be considered?</b></p> <p>Yes, green space is immensely important for wellbeing and, of course, areas which are protected have great value for nature and wildlife. This idea could be implemented in a variety of ways. For example, a tranquillity zone could be an effective way of protecting some areas of green space which separate areas of residential housing. The AONBs must continue to be protected, and the land on the borders of the AONB and the associated footpaths, might equally be considered for tranquillity designation under a plan of this sort.</p>
135	<p><b>Q. In which areas should development be resisted to avoid settlement coalescence?</b></p> <p>A. The point where Trimley St Mary and Trimley St Martin meet is an area of shared services with a shop, church and arts centre with farmland behind. This land should be protected in order to preserve the separate identities of the two villages. There is also a risk of development spreading all along the A14, creating a single conurbation from Ipswich to Felixstowe. It is very important that this is avoided and that a sense of place is retained.</p>
136	<p><b>Q. Which areas require special protection from development?</b></p> <p>The land between the High Road and the AONB should be the subject of special protection.</p>
143	<p><b>Q. Which sites do you consider appropriate for future consideration by the Council?</b></p> <p><b>Housing and Mixed Use Sites</b></p> <p>A. A large number of sites were put forward for consideration. Of these the</p>

following were considered to have been included in error:

- Site 356 - Land surrounding Ham's Farmhouse: this has been carried forward from an exercise carried out some years previously. It is understood that the landowner did not intend it to be considered on this occasion.
- Site 364, this was suggested some years ago as a possible site by the Parish Council. The PC no longer intended that it should be the subject of consideration.
- Site 497 Blue Barn Farm - Incorrectly located on the map.
- Site 978 Land to the Rear of Mill Lane – this site, as shown on the map, is the subject of planning application DC/16/1919/FUL which is understood to be currently pending s106 agreement.

In relation to the remaining sites put forward for consideration for housing, it is the view of the Parish Council that existing housing allocations for Trimley St Martin and already included within the Felixstowe Peninsula Area Action Plan, are of such a size and potential impact that the village cannot reasonably accommodate any housing above and beyond that allocation. In consequence of this none of the sites suggested for development are considered suitable. Further details on the burden already faced by the village are included in the answer to question 13 above.

#### **Land suggested for employment and/or Port related Use**

**Site 706** - The Innocence Farm site of 115.6 hectares has been suggested for use for storage or distribution. The views of the Parish Council are set out below. The Parish Council has also contributed to a cross boundary Parish Council group which will be submitting its views separately.

- No evidence has been presented to show that a site of this size is required for port related use.
- Storage and distribution uses demand large amounts of land, but do not generate a large number of jobs.
- This site borders residential housing in Kirton Rd and in Innocence Lane. To earmark it for port related uses which might arise at some unspecified point over the next 20 years would blight those homes, and, to a lesser degree, a considerable part of the villages of Trimley St Martin, Kirton and Falkenham.
- If the site were to be used for storage and distribution, the health and wellbeing of local residents would be compromised by the resulting air, noise and light pollution.
- A large number of studies have reported a particular association between exposure to air pollutants and adverse health outcomes in children. The site is very close to a primary school, and its playing field; it is also close to the Kirton recreation ground and play facilities. This focus for children's

	<p>facilities is clearly wholly unsuited to use of the type suggested.</p> <ul style="list-style-type: none"> <li>• In the absence of an underpass, HGV access to the site from the Port of Felixstowe would necessitate a journey along the A14 to Seven Hills in order to turn around and return on the eastbound carriageway. Similarly, HGVs leaving the site to travel westwards would first have to travel to the dock spur roundabout to turn around. These additional trips would increase pollution in the local area and, if made in the sort of numbers suggested previously – around 3,200 HGV attendances per day - would seriously undermine the functionality of that section of the A14 with huge implications for the economy of the area.</li> <li>• The existing A14/Croft Lane junction is wholly unsuited to large scale use. To create a suitable grade separated junction at Croft Lane would be a major undertaking which would wholly alter the character of the immediate area.</li> <li>• The site is good agricultural land; it should be retained for agricultural purposes.</li> </ul> <p><b>Sites 852</b>, Land opposite Morston Hall</p> <p><b>Site 853</b> Land at Morston Hall Road and adjacent to the A14</p> <p>These two sites are suggested for employment use. This location is only a short distance from the AONB. If a need were identified the sites might accommodate a small development offering a good number of high quality jobs, but it would be essential that any building should be constructed with particular sensitivity to the need to fit into the rural landscape.</p>
144	<p><b>Q. Are there any other sites you are aware of which the Council should consider?</b></p> <p>A. No</p>