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Trimley St Mary Parish Council

## Howlett Way

Dear Debra

I wanted to thank you for passing on the comments from the parish council and once again for allowing us to speak and answer questions at the meeting in June.

We've taken the opportunity to try and address some of the queries which were raised in the meeting as well as in your subsequent response in a little more detail. We would, of course, be more than happy to discuss these with you if that would be helpful. In the meantime, I would appreciate if you could pass this letter on to members of the parish council.

I've sought to provide the answers in the order in which the issues were originally raised. I hope you find that useful.

1. *The impact of increased and displaced traffic in Trimley St Mary.*
    - a. *There is no evidence to suggest that residents of the proposed development will use public transport/walk/cycle to places of work, recreation or shopping in Felixstowe, past experience shows they will use their own transport, and will take the shortest route, down the High Road.*
    - b. *It is a matter of opinion that the vast majority of residents will use the A14 not a proven fact.*
    - c. *An increase in traffic will exacerbate the existing problems of the pinch points outside McColl's, the Mariners / Churches / Village Hall and Trimley St Mary Primary School leading to an unacceptable impact on road safety.*
- And later*
- i. *That an evidence based assessment of the impact on traffic levels through Trimley St Mary is undertaken and provided to the planning authorities.*

To help answer these points, alongside the application there is a detailed Transport Assessment which will be scrutinised by independent engineers and highways officers at Suffolk County Council. The assumptions made as part of the assessment are all based on national and local guidance, with background data taken from Census data, including use of public transport, walking and cycling levels alongside accident records and our own traffic modelling. You can view this document on our website and on the council's own website.

The models use a national TRICS database, which is a recognised transport modelling software that has been used to predict traffic impacts of the development. This again will be reviewed by statutory consultees and you may have seen the response from Highways England which says:

*"We recognise that there has been dialogue with Suffolk County Council to agree certain assumptions at scoping stage, specifically trip generation, distribution and assignment. We have checked the assumptions which are now incorporated within the Transport Assessment and are reasonably content*

*with the approach which has been taken with regard to these aspects of the assessment which results in 94% of development traffic estimated to travel on the A14.”*

The report shows that:

- Looking at current movements through the traffic monitoring, as well as the TRICS modelling of predicted future travel patterns, most journeys will go along the A14 to their final destination – with a small number of journeys along the High Road. This has been independently reviewed and statutory consultees concur with its conclusions.
- These assessments also consider traffic collision data as a measure of safety, concluding the proposed development would not give rise to unusual or significant increased risk to highway safety. Again, this is reviewed by the county council and Highways England, and they also do not have any concerns regarding any pinch points.

As part of the planning application, Travel Plans are also created which encourage usage of alternative forms of transport – as well as other encouragements such as ensuring good access to local bus routes and cycle storage. The data within the transport assessment however assumes that new residents travel patterns reflect those found locally. **We would be happy to work with the parish to ensure sustainable methods of transport are encouraged.**

*i. The Parish Council consider the addition of two new mini roundabouts, at Station Road and New Road, to be the preferred way to reduce traffic speed and improve safety and access to both the Station and New Road estates.*

*ii. While there is little scope to improve parking facilities at these pinch points within the development site, the current land owner has land “set aside” behind the Welcome Hall that would be suitable and could be made available to the Parish Council to address this problem and help to mitigate the likely effects of increased traffic due to this development application.*

*d. The council welcome the inclusion of a pedestrian crossing in the vicinity of the Mariners/Churches. At current traffic levels this can be a dangerous place to cross and has been on our local road safety development plan for some time. Since this will be partly, or entirely within the Parish of Trimley St Mary the Parish Council wish to be consulted on the final location and design of the crossing.*

*e. Agricultural Vehicles currently access the proposed development site via the High Road/Howlett Way roundabout, and use a farm track skirting the edge of the development site to access the Bridleway to the bottom of Thurmans Lane, they then pass under the A14 to access the substantial amount of farm land to the North and East of the A14. This removes large slow moving vehicles from a narrow stretch of the High Road, and avoids them using the narrow and blind entrance to Thurmans Lane off the High Road.*

*And later*

*ii. The issue of continued permanent access for agricultural vehicles is added to the outline application to show the proposed route and allow the Planning Committee to assess the suitability of the proposals.*

*iii. That the item be included as a reserved matter to ensure the eventual development includes this access.*

Regarding the new roundabouts, these may well be projects that the parish council wish to explore through the Community Infrastructure Levy funding that is contributed as part of the development process. Applications such as Howlett Way are required to contribute towards schemes which mitigate the impact of new development –contributions through the CIL may be spent on projects the parish council wishes to see come forward.

**Separately, regarding the car parking issue, we would welcome continued discussions with Trimley St Martin and Trimley St Mary Parish Councils, as well as local businesses and representatives.** Given the proximity of the development, and the inclusion of a pedestrian crossing to

further increase the accessibility of the local services, the parking provision forms part of a wider betterment which the Trimley Estate is happy to review as a local landowner but does not form part of the application.

Following the discussions with the parish council, we have reviewed the comment about agricultural vehicles and note that there are alternative access options already available via the Candlet Track in addition to the established connections available via Thurmans Lane.

*The application includes a sewage storage and pumping station on the boundary with Trimley St Mary at the lowest point on the site.*

*a. The Parish Council seek assurances this facility will not result in any pollution of the environment in this sensitive area adjacent to public foot paths and a bridleway, in the event of a blockage or power failure.*

*b. While Anglian Water Authority state "The Sewerage system at present has available capacity for these flows", they go on to state "We will ask that the connection point and pumped discharge rate is agreed at section 106 stage". These two statements appear to contradict themselves, if there is no agreed or specified discharge rate how can they claim the current infrastructure has capacity? There are also other approved but incomplete developments totalling approximately 200 houses which will connect to the existing foul water system. We seek assurance the discharge from these properties has been taken into account when calculating the available capacity of the existing system for this application and that the additional load placed on the narrow sewer passing through the Parish to the treatment works will not cause issues for existing residents, including any requirement to dig up the High Road to add new capacity. Should this be the case we will need to see outline plans in order to assess the likely impact on our Parishioners.*

*c. In addition to already approved development, the Local Plan also anticipates the addition of a New Primary School, and a further 150 houses which will also connect to the existing system. Further down the system there are also proposals for significant development on the Walton North site. It is a known fact that there have been numerous instances of issues with the foul water disposal system in Walton. Planning Policy SCLP3.5 states: "Development will not be permitted where it would have a significant effect on the capacity of existing water infrastructure and it should follow the principles of Holistic Water Management. Specifically, developers should provide evidence to ensure there is capacity in the water recycling centre and the wastewater network in time to serve the development. Where there is no capacity in the water recycling centre, development may need to be phased in order to allow improvement works to take place. The agreed improvements should be in place before occupation of proposed dwellings in order to avoid a breach of environmental legislation."*

*We consider it would be appropriate for the Planning Committee to request a long-term capacity plan from the Anglian Water Authority taking account of all the approved and proposed developments in order to assess the real world impact of this development on the existing system.*

As foul and fresh water are under the remit of Anglian Water, these questions are mainly related to their response – which as service provider and statutory consultee they have provided. It has prepared its response to the application and, taking account of all relevant considerations including other permitted development, confirms the sewerage network has capacity for the flows, stating that there is sufficient capacity to deal with sewerage. Anglian Water were involved in the preparation of the District Council's new Local Plan and they are aware of the other planned developments in Felixstowe and the Trimleys that will have an impact on the foul sewerage network.

Details of connection point and pump discharge rate should be agreed at S106 stage, however this does not affect the in principle conclusion that appropriate details can be confirmed and there is no issue with the development in Anglian Water's view. **You did request further information and we recommend that this is taken up directly with Anglian Water about their view of the broader network. We can provide contact details if you wish.**

3. *The location of the boundary between the Trimley Parishes is driven purely by the location of the two Churches rather than by practical or logical considerations and the natural assumption of anyone visiting the Trimleys is that Howlett Way forms the edge of Trimley St Martin, and what can be seen to the east is Trimley St Mary. Policy SCLP 10.5 defines Settlement Coalescence as follows: “Development of undeveloped land and intensification of developed land between settlements will only be permitted where it does not lead to the coalescence of settlements through a reduction in openness and space or the creation of urbanising effects between settlements.”*

*a. Development of this Outline Application fails this policy by both reducing openness between the villages and creating an urbanising effect.*

*b. The application shows two storey developments stretching all the way from Howlett Way to the boundary between the Parishes. This will be clearly visible from Trimley St Mary, and will detract from the settings of a number of Grade II listed farm properties within the Parish.*

*c. The eastern boundary is a Bridleway and is actually located at the bottom of an ancient ditch which is so overgrown, steep and narrow as to be unfit for purpose. The strip of set aside on the eastern edge of the development site has been used as the Bridleway for many years.*

*In order to avoid village coalescence and maintain a usable Bridleway we would expect to see a low rise development, nestling on the lower eastern side of the site with a significant strip of “Green Wedge” included on the eastern side of the development so as not to impinge on the Bridleway and place all of the “coalescence avoidance” space within the Trimley St Mary Parish.*

The principle of development was discussed and consulted on during the preparation and adoption of the Felixstowe Peninsula Area Action Plan spanning from Issues and Options in 2014 to the adoption in 2017. As an outline application, no details of layout or building heights are seeking approval at this stage and the illustrative layout submitted with the application is purely indicative of a potential layout option for the site which would be further consulted upon during Reserved Matters.

However, we believe that the illustrative layout shows we have sought to address the impact on listed buildings as well as creating significant open space provision on the south of the site to preserve the setting of the listed churches nearby, alongside treading a careful balance of responsible development and density on an allocated site in a more rural setting.

The existing footpath and bridleway network has been a key consideration in the preparation of the illustrative layout and the idea to include perimeter open space with trim trail equipment has been informed by it. **We would be more than happy to discuss the overgrown bridleway with the parish council further to ensure it remains fit for use.**

4. *We note the noise assessment carried out on behalf of the developers clearly states that the A14 was closed eastbound overnight for the duration of the measurements, and that all traffic was diverted along Howlett Way and through Trimley St Mary. This explains the puzzling results, and quite clearly means that the results obtained were not typical, or normal in any way and that all noise calculations, assumptions projections and conclusions are invalid. The assessment should be repeated, when traffic conditions are normal, and the report re-written, and re-submitted BEFORE any determination is made on the application. With the benefit of local knowledge and experience we are able to advise that wind strength and direction, together with other weather conditions (rain for instance) have a significant effect on noise from the A14. It would be prudent for worst case scenarios to be included in the study to protect potential residents from unacceptable noise pollution.*

This was indeed the case, and the Noise Assessment notes this and did make adjustments to account for it. The consultation response from Environmental Health officers note that “it would be sensible to check the monitoring results are still valid and that the adjustment was a valid one. An update to the report would be required at the full planning stage.” **We would therefore expect a further assessment**

**to be required at the Reserved Matters stage when a final detailed layout is presented for consultation.**

*5. General Planning Consideration.*

*a. The site in question forms a part of the new ESC Local Plan. This is currently subject to inspection and is in a period of consultation regarding the main modifications recommended by the Inspector. All maps of proposed development sites, including this site, form part of these modifications and are therefore subject to change.*

*b. During the current period of Social Distancing due to the Covid 19 Pandemic we are concerned that ESC's failure to provide for an extended consultation period, or provide access to documentation for people unable to access the council website (as they have for the Main Modifications consultation mentioned above) will lead to any decision made by the planning committee being subject to legal challenge.*

*c. A development of this significance should be subject to a site visit by the majority of the Planning Committee, with representations from affected Parish Councils and any other interested local groups present to direct the committee members to the salient issues. During the current period of Social Distancing this is virtually impossible to achieve.*

The 'Main Modifications' consultation responds directly to issues raised by the Inspector following the conclusion of examination hearings. The only modification to Policy SCLP12.65: Land off Howlett Way, Trimley St Martin relates to the need for confirmation of adequate capacity in the foul sewerage network, which is provided in the Anglian Water consultation response to the application. The re-allocation of the site in the Local Plan (carrying forward the allocation from the 2017 Felixstowe Area Action Plan) is therefore effectively confirmed.

Whilst we appreciate that Social Distancing has had an impact on many aspects of our lives, we have tried to ensure easy access to information, such as being on hand to answer questions at meetings, putting the main documents and descriptions on our website and carefully reviewing feedback received. With lockdown conditions easing, site visits should be possible. The council's own consultation processes are being followed to ensure that the balance of ensuring a continuing supply of housing vs ensuring sufficient scrutiny is achieved.

This was all in addition to the original pre application consultation held by the Trimley Estate and subsequent ongoing discussions with local residents and parish councils – alongside the consultation which took place through the two Local Plan processes that have allocated the site. Over 1,500 residents were invited to the College's public consultation event regarding the development of the site in 2018 and over 100 attended an exhibition in Trimley Sports and Social Club. Details of the emerging proposals have been hosted on our bespoke website [www.trimley-howlettway.co.uk/](http://www.trimley-howlettway.co.uk/) since then.

**We wanted to ensure that the parish have appropriate answers to hand, however you may have other questions and we would be happy to facilitate a further meeting with members of the parish if you would find that useful.**

Please do keep in touch and we will continue to do so, letting you know of any further movements which may address the issues you have raised.

Yours sincerely



**Timothy Collins**

**Copy**

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