

Howlett Way Planning Application response.

Trimley St Mary Parish Council object to this application in its current form due to the following issues:

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.
 - 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.



Views of the narrow and blind entrance to Thurmans Lane.



Damage previously done by an agricultural trailer, two tractors towing irrigation equipment down the Bridal Way.

Thurmans Lane is a narrow country lane, with no passing places, used constantly by local residents, and both pedestrians and cyclists. There is nowhere for pedestrians to step off the road to avoid large vehicles for long stretches of the Lane. Should all agricultural vehicles be forced to use Thurmans Lane this will pose an unacceptable increase in the risk of road traffic incidents on the High Road, damage to property at the top of Thurmans Lane, damage to the surface and structure of the road itself, and the risk to pedestrians and cyclists. The only other alternative route is to follow the High Road all the way into Walton, and use Gulpher Road to access the far end of Candlet Track.

The Parish Council therefore seek the following revisions to the application:

- i. That an evidence based assessment of the impact on traffic levels through Trimley St Mary is undertaken and provided to the planning authorities.
 - 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.
2. 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 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 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 legislations."
- We consider it would be appropriate for the Planning Committee to request a long term capacity plan from 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.

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 development 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 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.

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.

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 to be 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.

Given the issues identified above, Trimley St Mary Parish Council would expect the Planning Committee to place the application on hold pending their resolution so the application can be properly scrutinised before any determination is made.