

## Summary of Trimley St Mary Parish Councils response to the Main Modifications consultation July 2020.

MM4

Page 39 Paragraph 3.39

### Old Suffolk Coastal District Council Area.

1. Failure to build the reduction in housing need into the development plan results in a contingency of 1,610 (16.5%), this is too high.
2. Failure to account for windfall development understates the contingency by 800, the real contingency contained in the plan is 2,410 (40%).
3. Failure to include windfall developments on sites larger than 0.2ha understates historical actuals by 324 units pa, 5,832 units over the plan period.
4. Failure to justify using 50% of the historical average windfall development for the plan grossly underestimates the volume of likely windfall development.
5. Impact of and opportunities arising from these errors and omissions.

1. Failure to re-plan.

A reduction in the housing need calculated in Table 3.2 to reflect the amendments required by the Inspector has reduced the overall number of dwellings required by 710. Failure to revise the plan in Table 3.3 to account for this lower figure now means that the contingency is 16.5% (1,610) dwellings, this is excessive.

- 2, Exclusion of Windfall

The Government guidance on Housing and economic land availability sets out the following guidance on Windfall Development.

"How should a windfall allowance be determined in relation to housing?  
A windfall allowance may be justified in the anticipated supply if a local planning authority has compelling evidence as set out in paragraph 70 of the National Planning Policy Framework.

Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance (using the same criteria as set out in paragraph 67 of the National Planning Policy Framework).

Paragraph: 023 Reference ID: 3-023-20190722

Revision date: 22 07 2019”

Paragraph 70 goes on to say

“70. Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”

<https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

The Select Committee on Environment, Transport and Regional Affairs Tenth report states

“The term 'windfall sites' is used to refer to those sites which become available for development unexpectedly and are therefore not included as allocated land in a planning authority's development plan. For example, a bus depot may shut down or an industrial site become vacant which may provide a suitable location for housing. However, local authorities are not allowed to take into account the contribution of any windfall sites over one hectare when drawing up Housing Land Availability studies (HLAs) with housebuilders. Planning Policy Guidance note 3 recommends that:

- an allowance is made for small sites below 0.4 hectares which should be clearly justified and not over-estimated;
- a further allowance can be made for sites between 0.4 and 1 hectare based on past experience and evidence that they will emerge; and
- no allowance should be made for sites above 1 hectare

The effect of not being allowed to include large windfall sites in HLA studies is that extra greenfield sites will still have to be released to satisfy the Five Year Land Supply rule (see above). The effect of not taking into account such sites can be demonstrated by the experience in London where a London Planning Advisory Committee study found that dwellings built on windfall sites of over one hectare in size have numbered about 50,000 in the period 1991-96 rather than the 12,000 anticipated.

The Department now recognises this issue and in the *Planning for the Communities of the Future* (para 63) document proposes to re-examine the approach/policy on calculating the potential of windfall sites”

[www.https://publications.parliament.uk/pa/cm199798/cmselect/cmenvtra/495/49524.htm](https://publications.parliament.uk/pa/cm199798/cmselect/cmenvtra/495/49524.htm)

In addition to the calculated excess, the plan states windfall development is not accounted for but is expected to amount to a further 800 units during the planning period. Why is windfall development excluded? When this is added to the contingency above, the figure rises to 2,410 dwellings, 40%! A plan with a 40% contingency is stretching the definition of a plan beyond its limits and becomes a ballpark estimate. This is simply not good enough.

### 3 Incorrect windfall figures.

Furthermore, in the supporting evidence from SCDC, [Suffolk Coastal Strategic Housing and Economic Land Availability Assessment Dec 2018, P11] statistics show an average of 97 windfall developments per annum during the period 2014 to 2018, however, developments are *only* counted as windfall where the site is less than 0.2ha and there are no details provided of the number of dwellings developed on windfall sites of greater than 0.2ha. It is clear from the evidence provided in (2) above that sites of over 0.2ha should be included in the windfall development estimates. Although the size of each site is not specified, **F**from documents presented to the main hearing, the actual total windfall over ~~the~~is period 2014 to 2018 was 2,160, an average of 421 dwellings per annum. There is no valid justification for excluding sites over 0.2ha from the windfall development numbers.; Windfall sites are clearly defined in the plan as:

"Sites which have not been specifically identified for development through the Local Plan process. They often comprise previously-developed sites that have unexpectedly become available."

An argument that any potential site over 0.2ha should be ignored because it is already included in the plan is an admission that the previous planning process failed to identify suitable sites where developers felt there was demand and it was economic to build. This plan is based on the same SHELAA, and there is no evidence or reason to believe anything has changed. The exclusion of sites over 0.2ha from the planning calculations understates ~~the~~ historic windfall development by a massive 324 units pa.<sup>2</sup> Using the councils arbitrary 50% reduction windfall development could still be expected to deliver

3,789 dwellings over the plan period, this has the potential to wipe out the current residual need in the entire plan area.

#### 4. Failure to justify arbitrary reduction in windfall allowance.

The supporting documents go on to suggest a figure of 50 per annum should be used from 2020/21, however the document fails to adequately justify halving the windfall allowance compared to the historical actual. Windfall development is by definition development of sites NOT identified in the local plan and cannot therefore be double counted. Over the plan period, using the quoted historical average windfall development figure of 97 pa, amounts to 1,746 dwellings. Taking the actual historic average over the same period of 421 would amount to a further 7,578 dwellings, ~~using the councils arbitrary 50% reduction windfall development could still be expected to deliver 3,789 dwellings. This has the potential to wipe out the current residual need in the entire plan area.~~

#### 5. Impact and Opportunities.

The overall strategy states that infill, and small cluster developments are preferred wherever possible as these have far less impact on spatial separation of settlements (~~coallescence~~coalescence), the environment, the historical character of the area or the transport, utility and public service infrastructure. However, given the overall estimated housing demand large developments are also required.

The reduction in residual need in Table 3.2 and taking windfall development into consideration would enable the removal or scaling down of all large developments that contradict the core strategy and call into question the need for either Garden Neighbourhood.

In table 3.2, "Plans for development (*without* permission or resolution to grant subject to S106((31.3.18) are sites identified in the current local plan that have not yet been brought forward for development. As these sites have been available since 2014, it is reasonable to assume these are difficult, uneconomic or unpopular sites and a developer cannot be found due to a lack of local demand, difficulties in developing the site, or local opposition. The excess of planned development over housing need is an opportunity to revisit their inclusion in the plan in favour of more suitable sites, or a significant reduction in the scale of proposed development. Removal of these sites would increase residual need to 3,734 against the plan to deliver 4,355 units, a contingency before windfall of 621.

3,400 of the planned units are in developments of over 100 units that are not infill/brown field sites. While it would be preferable to properly plan the spatial distribution across the entire plan area, the simple removal, and/or scaling down of the very large ( $\geq 150$ ) developments where planning permission is yet to be granted could easily accommodate the demand deficit.

Well considered Local Plans developed by many other local authorities include sites for housing contingency rather than a simple gross oversupply across the entire plan. To ensure infrastructure and resource plans for Health, Education, Social Services, Utilities and Transport can be prepared costed and scheduled it would be sensible to target required development on the most suitable sites. Where housing demand depends on economic growth, firm evidence of this economic growth, or a shortage of housing supply that is not satisfied by planned or windfall development would trigger the adoption of a contingency site.

More broadly, the revised jobs growth predictions - which the housing demand is predicated upon - is entirely unsound given the recent pandemic which is resulting in redundancies at the Port of Felixstowe NOT more employment. This underpins the entire rationale of the housing needs within the local plan and it would be reckless ('unsound') to pursue approval for the plan whilst neglecting to address these fundamental shifts in circumstance.

MM7 Page 49, Policy SCLP3.3

Settlement Boundaries - what's the point?

Page 51 of the Local Plan describes and defines Settlement Boundaries and this is encompassed by policy SCLP3.3. However, this, and previous plans have completely ignored settlement boundaries when identifying potential sites for development and have arbitrarily moved the settlement boundaries, without any regard to local consultation. Paragraph 3.51 states:

These boundaries allow for flexibility in the Local Plan by potentially allocating more development than is planned for by the allocation of specific sites, at the same time as avoiding the loss of further undeveloped land in the countryside and controlling the sprawl of existing settlements.

Table 3.4 sets out the policy for development in Large Villages:

*Housing*

New housing allocations (Section 12)

New housing development and infill within Settlement  
Boundaries (Policy SCLP5.1)

However, if the boundaries can be moved at will, is there any point to this policy?

Areas outside the Settlement Boundary are defined as "Countryside", policy SCLP5.3 sets out the policy for Housing Development In the Countryside:

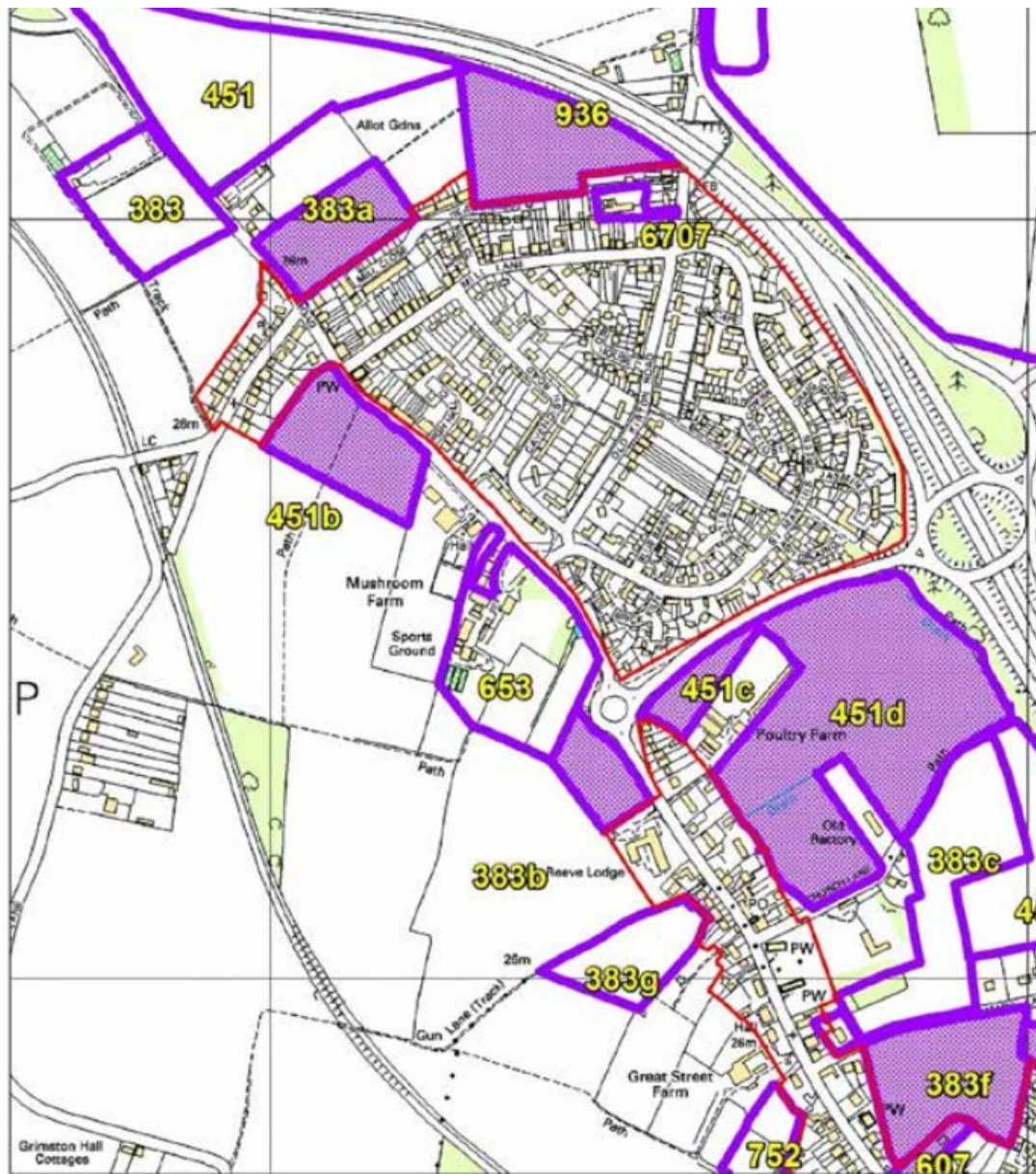
**Policy SCLP5.3: Housing Development in the Countryside**

Outside of the defined Settlement Boundaries, new residential development will be limited to:

- a) Affordable housing to meet identified local needs on exception sites adjacent to, or well related to, Settlement Boundaries or clusters of housing in the countryside (in accordance with Policy SCLP5.11 and Policy SCLP5.4);
- b) Limited development within existing clusters (in accordance with Policy SCLP5.4);
- c) Replacement dwellings on a one to one basis where these are no more visually intrusive in the countryside than the building to be replaced;
- d) Subdivision of an existing larger dwelling;
- e) Conversion of an existing building (in accordance with Policy SCLP5.5);
- f) Rural workers dwellings, where there is an essential need for a rural worker to live permanently at or near their place of work (in accordance with Policy SCLP5.6);
- g) Other residential development consistent with policy on residential development in the countryside contained in the National Planning Policy Framework.

This policy clearly indicates a desire to limit development in the Countryside to protect the environment in all its manifestations and prevent urban sprawl. The arbitrary re-definition of Settlement Boundaries does not reflect this policy in either spirit or fact.

The map below is taken from the archives of the previous plan and clearly shows the extent of the settlement boundaries of most of Trimley St Mary and Trimley St Martin at that time, and that ALL the proposed sites were outside the boundary.



Map 3 - Trimley St Martin SHLAA Sites

Scale 1:7000



Site 383a, approval to build 69 houses.

Site 451b, approval to build 70 houses

Site 653, approval to build 66 houses (complete)

Site 383f, approval to build 98 houses (complete) – adjacent site(not shown [on map extract](#), approval to build 48 houses.

Site 451c, application to build 7 houses.

Site 451d, proposal to build 340 houses - contained in this plan and subject to Outline application.

Site 383b. (extended), proposal to build 150 houses and a school – contained in this plan.

Since this map was drawn, the Planning Authority has approved the building of 205 houses in Trimley St Martin, and 14<sup>64</sup> houses in Trimley St Mary that were located in what is defined as Countryside, and is currently considering or proposing a further 497. These figures exclude windfall and small site development.

## MM49

183 and various other pages

1. The legality of removing protection from development for land south of Walton high street adjacent to the A14 Dock Spur to the east of Trimley St Mary, and north of Thurmans Lane at this stage in the process.
  - a. Given the national planning policy framework's test of soundness, there is no basis for considering the plan 'unsound' with the continued inclusion of the 'areas to be protected from development' south of Walton high street and land north of Thurmans Lane. Removal at main modification stage would be likely to attract legal challenge.
  - b. Continued application of the existing 'long-standing' policy of areas to be protected from development does not make the plan unsound or legally non-compliant. To be included as a main modification, 'The main modifications must relate directly to the reasons why the Inspector has found the plan unsound or legally non-compliant'<sup>1</sup>. No evidence has been provided to support why the inclusion of protection from development for these areas should cease.
  - c. These changes were not included in a previous consultation and are not required for the local plan to be 'sound and legally compliant' and therefore should not be considered within the Main Modification stage. "The Inspector may only recommend such changes to the MMs without further consultation if he or she is satisfied that no party would be prejudiced as a result"<sup>1</sup>.
  - d. ESC has stated that 'as the result of Covid-19, it is not possible to fulfil certain requirements of the Statement of Community Involvement'<sup>2</sup>. As such – notwithstanding the additional 'measures to enable safe participation'<sup>3</sup> set out in relation to the consultation – the council are evidently breaching their duty to

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<sup>1</sup> Procedure guide for Local Plan Examinations. The Planning Inspectorate. June 2019 (5<sup>th</sup> Edition)

<sup>2</sup> <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/suffolk-coastal-local-plan/existing-local-plan/statement-of-community-involvement/>

<sup>3</sup> <https://suffolkcoastallocalplan.inconsult.uk/consult.ti/mainmodifications2020/consultationHome>

cooperate by continuing to consult during this period of lockdown.

- e. The measures<sup>2</sup> under which the ESC carries out their 'duty to cooperate' would appear to be inadequate given even District councillors are completely unaware of significant changes introduced during the main modification phase which has been conducted 100% under lockdown. A County Cllr stated he thought the removal of 'Areas to be Protected from Development' must have been omitted in error<sup>4</sup>. This is provided as an example of the lack of rigour that has been applied to the consultation as a result of a complete lack of local social engagement. The community has not been able to engage 'face to face' to debate and discuss the contents of the consultation that has occurred solely during lockdown. Changes of this nature require public full and proper local engagement.
  - f. The comment in document J35 that the period of consultation on the Main Modifications was sufficient time for the ESC to produce evidence that these protected areas are still required indicated a desire for justification of the Policy rather it's simple deletion from the Local Plan.
2. Time should be allocated to prepare further evidence to justify the continued inclusion / validate exclusion
- a. During discussion at the June Trimley St Mary Parish Council meeting, not even a local District Councillor was aware that this modification was made; so, it is unrealistic to assume that local residents have a full awareness of these most recent changes to the Local Plan.
  - b. During lockdown, residents have been less able to communicate regularly and freely, with limited social interaction. Since the Main Modification was launched and will complete during lockdown, local awareness of changes contained within the consultation is likely to be diminished through lack of social interaction (clubs, societies, local amenities etc) where 'word of mouth' would have been likely to fully inform the community of changes contained within the consultation and awareness of these considerations relayed to ESC. This community engagement has not been possible during lockdown.
  - c. There are numerous recognised concerns with attempting a consultation during Covid-19 lockdown, these are listed here:
    - i. **It isn't possible to reach and engage with a sufficiently wide audience**

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<sup>4</sup> June Trimley St Mary Parish Council meeting minutes.

Even if the chosen engagement methods are theoretically feasible during the government Covid-19 measures, the issue of whether you can actually reach a sufficiently wide audience still remains. For example, if key stakeholders include elderly and / or vulnerable people, it may be very challenging to reach and engage with these sections of the public because of the current government advice for elderly and vulnerable people to stay at home for 12 weeks. In this instance, switching to online-only methods of engagement may not provide a satisfactory solution as these groups may be less likely to have access to the internet or feel comfortable engaging with a consultation digitally.

ii. **The notice of the consultation will not reach a sufficiently wide audience.**

Many of the usual methods of making information available and accessible to the public have now become unworkable and in some cases, simply impossible. For example, posting site notices with details of infrastructure schemes for the public to see when walking past are evidently not going to be effective during a lockdown where the majority of the population are being asked to stay at home. Equally, newspaper circulation has been impacted by Covid-19, which means that newspaper notices may be less effective.

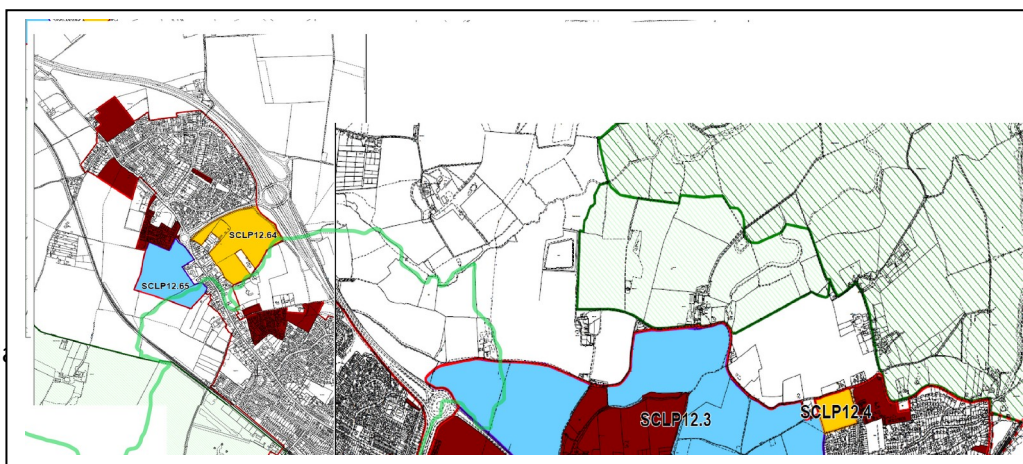
iii. **The proposals cannot be given intelligent consideration during this time.**

The public are understandably very distracted by Covid-19 and therefore it could be argued that they are not currently able to give proper consideration to other issues, nor sufficient opportunity to participate

- d. Council preparedness during the Covid-19 pandemic to respond to the Inspectors request for further evidence for the removal of Areas Protected from Development.
  - i. ESC resource is likely to be stretched dealing with the impact of Covid-19 so more time should be allowed to conduct full and proper analysis, leading to constructive evidence.
- e. Trimley St Mary PC would welcome a survey of residents to obtain a full understanding of the importance of both sites currently protected from development and would be willing to fund this.

- 3. Trimley St Mary has a lack of greenspace / public open space and of which remains that is identified to be protected from development should continue to remain protected from development.

- a. With regard to open space, Trimley St Mary falls well short of the national standard of 2.3 hectares per 1000 population.
  - b. Losing this vital community asset would be detrimental to the village.
    - i. The land south of Walton high street adjacent to the A14 Dock Spur to the east of Trimley St Mary, and the land to the north of Thurmans lane is used by huge number of walkers (100s) on a daily basis. Not protecting this land from development would significantly disadvantage a large proportion of the community that currently enjoy this public open space and community asset.
    - ii. The land south of Walton high street adjacent to the A14 Dock Spur to the east of Trimley St Mary is an amenity in its own right. For those people living north of the High Road, it provides a valuable link to Trimley's network of PRow's. Since the level crossings were closed at the western end of the village, access to these has been already much compromised.
  - c. Trimley High road is a busy road with no road crossing. Reducing public open space / greenspace provision both increases the burden on what little remains and increases the demands on the busy high roads through an enhanced need for pedestrians to cross the busy road.
  - d. Both areas are popular with walkers / dog walkers who – given the scale of nearby development - would not have an alternative option.
4. Keeping this green space is essential to maintaining the village character of Trimley St Mary, especially given the extent of development nearby.
- a. Scale of development seeking planning permission is already detrimental to the village identity. Since 2011, in excess of 3000 new dwellings have been built or are proposed to be built in the vicinity of a village of only 3,665 residents according to the 2011 census.
  - b. It is not until you view the extent of proposed development in the entire area that it is evident how much open space is being sacrificed and the overall impact on coalescence.



Red – Planning granted, Yellow – carried over from current plan, Blue – new sites.

- c. Both areas are incredibly popular recreational sites for the village
- d. As recently as 2016, the Local Authority asserted in the Felixstowe Peninsula Area Action Plan Development Plan Document (October 2016) that the land south of Walton high street adjacent to the A14 Dock Spur to the east of Trimley St Mary, and the land to the north of Thurmans lane should be protected from development. The reasoning remains sound, more so now than before given the increased scale of development proposed more recently nearby. From the Felixstowe Peninsula Area Action Plan Development Plan Document (October 2016):
  - iii. Residential allocations in Felixstowe (Policy FPP4), Trimley St Mary (Policy FPP8) and Trimley St Martin (Policy FPP7) could result in settlement coalescence without new areas identified to maintain separation between settlements. The introduction of areas to be protected from development adjacent to these residential allocations will reinforce the separation between Trimley St Mary, Trimley St Martin and Felixstowe, thereby assisting in protecting the individual character of these settlements.
  - iv. Land north of Thurmans Lane in Trimley St Mary is therefore identified as a new area to be protected from development to resist further expansion of Trimley St Mary and Trimley St Martin in this location. Historic England has advised that development in this area may have an adverse impact on the setting of listed buildings and support protecting this area from development.
  - v. Land south of High Road, Trimley St Mary and west of the A14 Dock Spur is also identified as a new area to be protected from development. The site is currently part allotments and part natural greenspace which provides access to footpaths and the rights of way network. The site was designated under the 2001 Local Plan Policy AP171 as an area where the open character was to be protected from development. Although covered by an individual policy in the 2001 Local Plan, the principles of resisting development in this area are similar and therefore the AAP proposes a new area to be protected from development in this location.

5. 'Areas protected from Development' This is a 'long standing policy' within the district (as stated in previous versions of the Local Plan) and as such: evidence should be provided as to why the policy has changed.

- a. There is simply no driver to change this policy. The policy (for the areas in question) has never been challenged and is welcomed by Trimley St Mary Parish Council and residents.
- b. The 2008 report entitled 'A local strategy for the Felixstowe Peninsula'<sup>5</sup> identified the site between Trimley St Mary and Walton (Paddock land east of St Mary) which is now being proposed to be removed from protection as badly suited for development, ranking 21st out of the 25 surveyed sites.

The report conclusions and recommendations in respect of this site were: Appendix B, Site Analysis Report

para 11.05: Due to the high quality of the landscape character of this site and its popular role as green, open recreation space for the surrounding community, this site should be exempt from potential development.

para 11.06: The site can play an important role in maintaining a strip of protected open space /green separation between Trimley St Mary and the A14.

These findings remain valid.

- c. In 2015 Historic England requested the land north of Thurmans Lane should be Protected from Development as part of previous Local plan engagement:
  - vi. FPP26: Areas to be Protected from Development. In our response to you dated 25th February 2015 we expressed concerns regard the inclusion of all the sites in Trimley St Martin which would in effect surround a number of Listed Buildings including Grade II listed churches, the Grade II listed Old Rectory and Grade II Listed Building Mill Farmhouse. We recommended the inclusion of an area to be protected from development

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<sup>5</sup> 'A local strategy for the Felixstowe Peninsula' produced by David Lock Associates. Aimed at 'producing an independent study of the Peninsula to formulate a long-term strategy for the regeneration and enhancement of the urban fabric of Felixstowe and adjoining villages'.

which would protect the remaining green wedge and as a result protect the setting of a number of Listed Buildings. It is acknowledged that the green wedge within Trimley St Martin is proposed to be included within the Areas to be Protected from Development and this is particularly welcomed and supported.

6. Removing the protection from development puts this land at risk of infill development - further burdening already limited infrastructure.
  - a. Road – Trimley High road is increasingly busy with many residents regularly complaining about speeding vehicles. The Parish Council has installed speed indicator devices to attempt to mitigate these issues. Any additional development not only adds to the burden on the limited road network, it alters the flow of traffic further adding to dangers associated with the highway.
  - b. Parking – There are very limited spaces for parking within Trimley St Mary. A frequent complaint of residents is how parking on the highway partially blocks one lane of traffic causing dangerous traffic backlogs. Additional development will only add to this demand and exacerbate the problem.
  - c. Sewerage – All sewerage from Trimley St Martin, Trimley St Mary and Walton passes underneath the high road. The sewers have not been enhanced inline with the scale of development that Trimley St Martin, Trimley St Mary and Walton have experienced. The sewers regularly require maintenance causing significant traffic delays.
7. Coalescence - in both cases the land currently protected from development forms an essential means of maintaining separation and prevent the merging of Walton and Trimley St Martin with Trimley St Mary. This land also protects the rural character of Trimley St Mary and must continue to be protected from development.
  - a. As recently as 2016 the Local Authority asserted in the Felixstowe Peninsula Area Action Plan Development Plan Document (October 2016) that the 2 areas currently protected from development in Trimley St Mary should be protected from development, the reasoning remains sound, more so now than before given the increased scale of development more recently proposed nearby.
    - vii. Residential allocations in Felixstowe (Policy FPP4), Trimley St Mary (Policy FPP8) and Trimley St Martin (Policy FPP7) could result in settlement coalescence without new areas identified to

maintain separation between settlements. The introduction of areas to be protected from development adjacent to these residential allocations will reinforce the separation between Trimley St Mary, Trimley St Martin and Felixstowe, thereby assisting in protecting the individual character of these settlements.

MM98

Page 388 Paragraph 12.753

Contrary to assertion in other sections of the plan, this clearly states there are capacity limitation at the Felixstowe Water Recycling facility. We consider the following information to be vital in determining the viability of the entire development plan for Felixstowe North and the Trimleys.

- 1, The extent of all the likely works and their impact on the existing community.
2. The cumulative effects of the entire plan for new dwellings connected to the Felixstowe Water Treatment Centre and the trigger points in terms of the number of new houses built.

Page 389 Policy SCLP12.65

The current opportunistic Outline Planning Application should be suspended pending proper consideration of the issues identified below.

Failure to reflect the reduction in housing allocation or take account of windfall development required in the local plan renders this site surplus to requirements. There is a contingency of 611 dwellings in the immediate area, and many other sites are more suitable for development with a lower impact on the Historic environment, village coalescence and an ANOB.

This policy fails to consider the impact of village coalescence or provide for protected green wedge to protect the settings of a number of listed properties as requested by Historic England or to prevent future coalescence as detailed in SCLP10.5.

While the site is within the Parish of Trimley St Martin, it is evident from any map, and from approaching the villages via Howlett Way that this site forms the majority of "Green Wedge of Separation" between the two Villages. The settlement boundary does not appear to have been drawn up with the prevention of village coalescence in mind and should be reviewed in line with the above policy. This, together with the disproportionate size of the development calls into question the suitability of entire site.

a) This policy only considers the vehicular access for new traffic generated by the site and fails to consider existing farm traffic that uses this site for access to the remaining farmland West of the A14, and via Thurmans Lane and the A14 underpass to the substantial area of farmland East of the A14. Removal of this access for agricultural vehicles will force them to use the High Road, passing through a known traffic "pinch point", then take the blind, narrow entrance into Thurmans Lane which is a narrow country lane, with no passing places or provision for pedestrians. This poses an unacceptable risk to road safety.

h) While the proposal includes funding towards the provision of a new Primary School, the estimates are that the current school will run out of capacity in 2020/21. These estimates did not include the 69 new dwellings added at the northern end of the village that were not part of the existing plan.. Before this development commences, SCC should provide details of the additional capacity they are able to make available, or ensure the new school is completed *before* any of these proposed dwellings are occupied.

p) Paragraph 12.725 calls for an Air Quality assessment to assess the cumulative impacts of all the developments within the Trimley villages, this should be more specific to ensure this wider requirement is not overlooked. The same paragraph also calls for an extension to the Landscape buffer beyond the immediate boundaries of the site to reduce the noise impact on the boundary.

q) Duplicate of policy l). However, confirmation must take into account the expected foul water output of existing planning permissions and current ongoing build down the entire length of the sewer to the treatment centre and not simply evaluate this development against current capacity.

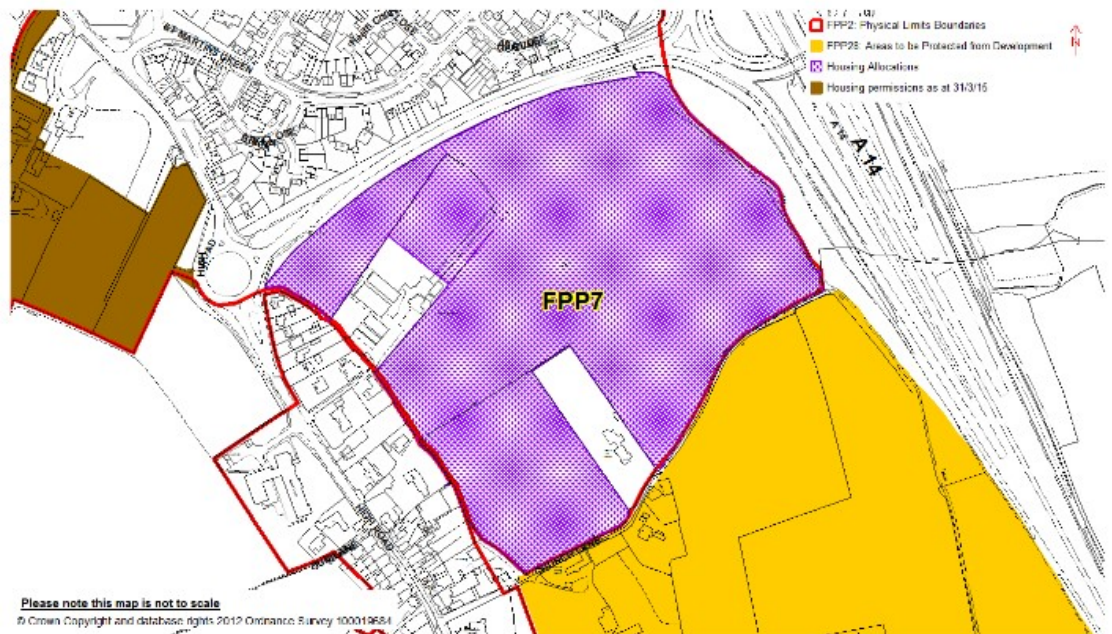
MM99

## Page 390 Paragraph 12.758

1. Failure to reflect the reduction in housing allocation or windfall development required in the local plan renders this site surplus to requirements. There is a contingency of 611 dwellings in the immediate area, and many other sites are more suitable for development with a lower impact on the Historic environment, village coalescence and an ANOB.
2. The Settlement boundaries of the two Trimleys appear to have been moved to accommodate this development. When, why and with what consultation did this occur? Map taken from current Local Plan clearly showing Reeve Lodge to be outside the settlement boundary.

### Land off Howlett Way, Trimley St Martin

Site Area: 10.64ha



Felixstowe Peninsula Area Action Plan Development Plan Document  
Adopted – January 2017

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3. Contradiction in terms of paragraph 12.762, how can a site that straddles the village boundary “provide for the aim of avoiding coalescence of communities”?  
It is evident from any map, and from the views West from the Howlett Way/High Road roundabout that this site forms the majority of “Green Wedge of Separation” between the two Villages. The settlement boundary does not appear to have been drawn up with the prevention

of village coalescence in mind and should be reviewed in line with the above policy. This calls into question the suitability of entire site.

4. In the interests of completeness this policy should indicate the intentions for the existing Primary school and surrounding playing fields. It is local belief this will be converted to housing, adding further to the disproportionate number of new dwellings imposed on the Trimleys and the associated increase in demand for services.
5. The site is no longer in use as a temporary depot, it is cultivated farmland.
6. Existing access to the ANOB is through open farmland via a BOAT, it is a subjective unsubstantiated argument that building on this area will improve access for pedestrians and cyclists.

#### Paragraph 12.762

Notwithstanding the contradiction in terms of straddling a village boundary yet avoiding coalescence, the ANOB is to the West of the site and a landscape boundary here would do nothing to maintain separation of the villages.

#### Page 393 Policy SCLP 12.66

e) Separation is perceptive therefore this policy needs a definition of separation to ensure there is the perception that the two villages remain separate. Ribbon development along the High Road already blurs the separation between the villages, this entire site consists of the perceived separation between the villages.

j) This provision already exists and the policy should read "maintain and improve" rather than "Provision".

j) Sewerage capacity adequacy must take into account the outflow from existing planning permissions and developments already in progress down the entire length of the sewerage system to Felixstowe Treatment Centre.

#### General comments section

- Part of the Felixstowe Garden Neighbourhood is within St Mary - this is shown as Felixstowe. St Mary need to be consulted when planning application is submitted and be considered for CIL.
- Housing needs figures need revision in light of economic trends. Jobs growth predictions - which the housing demand is predicated upon - is entirely unsound given the recent pandemic which is resulting in redundancies at the Port of Felixstowe NOT more employment. This underpins the entire rational of the housing needs within the local plan and it would be reckless ('unsound') to pursue approval for the plan whilst neglecting to address these fundamental shifts in circumstance.

### Policy Map Modifications

PM21 Page 386 Neither Parish Council have been consulted with regard to a change to the settlement boundary. This is an arbitrary change implemented by ESC to conveniently bring the proposed development within the Settlement Boundary and refines the area from Countryside to Large Village.

PM22 Page 390 The Parish Council have not been consulted with regard to a change to the settlement boundary. This is an arbitrary change implemented by ESC to conveniently bring the proposed development within the Settlement Boundary and refines the area from Countryside to Large Village.

PM34 Page 608 The Parish Council have not been consulted with regard to a change to the settlement boundary. This is an arbitrary change implemented by ESC to conveniently bring the proposed development within the Settlement Boundary and refines the area from Countryside to Large Village.

PM35 Page 609 The Parish Council have not been consulted with regard to a change to the settlement boundary. This is an arbitrary change implemented by ESC to conveniently bring the proposed development within the Settlement Boundary and refines the area from Countryside to Large Village.

PM39 – Various Removal of this area to be protected from development contravenes an agreement with Heritage England to protect this area from any future development to preserve the historic environment of a large number of listed properties in exchange for their approval of the sites built to the South of Thurmans Lane, and the Howlett Way development.