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Planning Policy and Delivery Team
East Suffolk House
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21 February 2019

Dear Cllr Fryatt,

Final Draft Local Plan Consultation

Thank you for the opportunity to respond to the Suffolk Coastal District Council Final Draft Local Plan Consultation.

Felixstowe Town Council has carefully reviewed the consultation documents and this submission should be considered in conjunction with our responses to the First Draft Local Plan Consultation and the Local Plan Issue & Options Consultation.

It is positive to note that the Final Draft encompasses a large number of changes recommended by Felixstowe Town Council and reflects many of the representations made during the First Draft Consultation stage.

In particular, the Town Council is pleased to note that the policy for the North Felixstowe Garden Neighbourhood now provides protection for the important community open space at Eastward Ho, adjacent to the Grove woodland, as per our request. The need to retain this critical and much-loved public amenity space was strongly echoed by residents during the consultation phase. It is crucial that this should be a preeminent feature of a future, more detailed masterplan for the site which should also provide a much wider range of green spaces, and better walking and cycling access to countryside beyond that which currently exists.

However the Town Council remains concerned that the policy for the North Felixstowe Garden Neighbourhood does not explicitly address the need for good internal vehicular accesses across the development. The Town Council believes that the success of the Garden Neighbourhood concept will be contingent on the masterplan incorporating such access so that it can function as a coherent whole and develop as a recognisable community in its own right. References to 'gateways' are made in relation to other sites in the Local Plan, therefore it is disappointing to note that the Town Council's assertion, that the North Felixstowe Garden Neighbourhood concept presents a unique opportunity to provide an iconic gateway to the town, is not reflected in policy SCLP12.3.

Similarly, whilst the Town Council appreciates that policy SCLP12.4 (Land North of Conway Close and Swallow Close) now resides adjacent to SCLP12.3 in the

document - as it does on the ground – and states the need *“for appropriate vehicular access to the Garden Neighbourhood”*, we feel that the policy should have fully incorporated the objective outlined in para. 12.70: *“The site is adjacent to the proposed North Felixstowe Garden Neighbourhood and this site should be designed in a way which enables it to be integrated through appropriate access for vehicles, pedestrians and cyclists with the Garden Neighbourhood.”*

The Town Council is pleased to note the introduction of policy SCLP12.16 (Felixstowe Leisure Centre) with the caveat that a new major leisure / resort facility should be of such scale and quality as to add a completely new dimension to the thriving resort. It is concerning that the policy, as written, undermines these aspirations by mandating that *“development will be expected to accord with.... i) Limited residential on upper floors”*. It is noted that the requirement under SCLP12.16(a) for *“a mix of uses which promote unique, modern and imaginative tourist, resort and visitor opportunities”* does not necessarily preclude the incorporation of residential development.

With reference to SCLP4.8 (New Retail and Commercial Leisure Development) the Town Council questions the absence of parking provision. There appears to be a general lack of emphasis in the Plan for adequate car parking provision, supported by policies designed with the customer in mind prioritising good value, short-stay, convenient access to shops and leisure facilities. Similarly, the Town Council notes that Policy SCLP7.1(Sustainable Transport) does not realistically address the need for new developments to also ensure the provision of adequate parking and suitable road widths.

The Town Council notes the evolution of policy SCLP12.35 (Land at Innocence Farm) since the First Draft Local Plan. Whilst Felixstowe Town Council appropriately refrains from commenting on the principle of developments outside its parish boundary, the Council has some legitimate interest in the policy for this site due to its expressed purpose to support the continued success of the Port of Felixstowe and the likely effect on Felixstowe in terms of the potential impact on the A14. It is critical that the policy should explicitly require that graded road junctions to the site from both sides of the A14 are provided ahead of the development, to ensure that associated HGV traffic is not required to circulate at J58 (Seven Hills) or J59 (Trimley/Kirton) in order to access the site.

The Town Council supports the overall aims of the Local Plan document but cannot consider it to be ‘sound’ in its current form. However, by making some minor modifications to address the specific elements outlined in this letter, the Town Council would be pleased to endorse the Local Plan and believes that the Planning Authority will be better able to realise its objectives.

Yours sincerely,



Ash Tadjrishi
Town Clerk