

Ordinary Council 12 September 2018 – Appendix B

Planning Policy and Delivery Team
East Suffolk House
Station Road
Melton
Woodbridge
IP12 1RT

xx September 2018

Dear Cllr Fryatt,

First Draft Local Plan Consultation

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

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

In general, whilst we understand the concerns expressed by some members of the public over the housing allocation proposed for Felixstowe, the Town Council recognises the need to strategically and carefully plan for a good mix of housing to support aspirations for our existing residents – be they growing families, first-time buyers or people looking to downsize – as well as the long-term growth and continued investment in the town. The Town Council also understands that the existing and proposed allocations for the northern part of Felixstowe, totalling around 2,000 homes over the next 20 years, is consistent with average growth for this town since the turn of the 1900s. On the basis that a masterplan for the North Felixstowe Garden Neighbourhood will secure the infrastructure necessary to ensure this area can be appropriately connected to and deliver enhancements for the wider Felixstowe community, the Town Council endorses this approach.

Felixstowe Town Council is therefore pleased to support the overall ambitions of the Suffolk Coastal District Council First Draft Local Plan, subject to the following comments in relation to the proposed policies therein. Where a Local Plan Policy is not referred to in the responses below, the Town Council had no comment.

Wider Strategic Planning Area

Policy SCLP2.2: Strategic Infrastructure Priorities (p20)

Felixstowe Town Council is pleased to note and support the key strategic infrastructure projects detailed in this policy. In addition, consideration should be given to the need to upgrade the Seven Hills and Foxhall roundabouts; widening Candlet Road; improving sewerage capacity; and upgrading the resilience of the electricity supply - especially around Port area. Sustainable links to/from Felixstowe across the Deben and Orwell rivers should also be included. Currently, some of our residents and businesses are not able to access a comprehensive range of high-

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quality digital communication services and this is essential in a major centre such as Felixstowe.

Suffolk Coastal Spatial Strategy

Policy SCLP3.1: Presumption in Favour of Sustainable Development (p28)

Felixstowe Town Council supports this policy.

Policy SCLP3.2: Strategy for Growth in Suffolk Coastal District (p36)

Felixstowe Town Council supports this policy subject to:

3.2(a): greater clarity being given to differentiate between the baseline requirement of 13ha of land required for employment use and the later statement “New strategic employment allocations based around key transport corridors, including to support the Port of Felixstowe”(Note: it would be helpful to use one set of numbering i.e. 3.2(a-h) rather than 3.2(a-d) twice).

3.2(c): acknowledging a need for a real mix of housing tenure options which could include shared-ownership schemes as well as social housing and market-affordable homes.

3.2(d): assurances that infrastructure provision is delivered ahead, or otherwise at an early stage, of associated development.

Policy SCLP3.3: Settlement Hierarchy (p40)

Felixstowe Town Council supports the principle of the proposed Settlement Hierarchy but asks that consistency and clarity be given to the housing totals in the preceding tables (Table 3.2: 3,370 homes, Table 3.3: 3,560).

Policy SCLP3.4: Settlement Boundaries (p46)

Felixstowe Town Council supports this policy.

Policy SCLP3.6: Infrastructure Provision (p53)

Felixstowe Town Council supports the aspirations of this policy, in accordance with our comments to SCLP2.2 above. It is essential that new housing developments should have their own green space and a need for existing open spaces to be preserved, enhanced or otherwise re-provided to ensure that all residents have easy-access to informal recreational green space in Felixstowe. Housing developments in Felixstowe will increase demand on local services such as Walton surgery which could be upgraded to improve the premises and increase the number of doctors.

Economy

Policy SCLP4.1: Employment Areas (p58)

Felixstowe Town Council supports this policy.

Policy SCLP4.2: New Employment Areas (p60)

Felixstowe Town Council supports this policy but requests that there be a much more significant analysis of the strategic needs of the Port in justifying future employment areas.

Policy SCLP4.3: Expansion and Intensification of Employment Sites (p61)

Felixstowe Town Council supports this policy.

Policy SCLP4.8: Retail Hierarchy (p68)

Felixstowe Town Council supports the proposed retail hierarchy.

With reference to para.4.48, the Town Council asks that the District Council states here that it will work with Chambers of Commerce and similar organisations in developing concepts for the District's retail offer.

Policy SCLP4.9: New Retail Development (p70)

Felixstowe Town Council welcomes the requirement for significant retail planning applications to provide an impact assessment to protect the vitality and viability of the town centre. Developments should also consider sustainable public transport and cycle links.

In the ever-changing retail landscape, policies should be flexible enough to encourage innovation and contribute to an overall a sense of place to ensure that residents are provided a wide range of high-quality local retail and leisure offers which minimise the need to travel out of town.

New retail developments in town centres and other retail centres should consider the impact on parking provision. Car parking policies, which should be designed with the customer in mind, must prioritise good value, short-stay, convenient access to shops and leisure facilities.

Policy SCLP4.10: Development in Town Centres (p72)

Felixstowe Town Council supports the policy and welcomes the strengthening of any rules to protect and/or restore historic shopfronts.

Policy SCLP4.11: Town Centre Environments (p73)

Felixstowe Town Council broadly supports this policy and requests that the opportunity to enhance links between town centres and other local points of interest (for example, between Felixstowe's town centre and seafront) be clearly outlined here. A minor change to the final sentence is requested as follows: "The expansion of Shared Space and Dementia Friendly areas will be supported where proposals maintain active town centre frontages without **unduly** compromising highway access, vehicular and pedestrian movements."

Policy SCLP4.13: District and Local Centres and Local Shops (p75)

Felixstowe Town Council supports the policy.

Housing

Policy SCLP5.3: Housing Development in the Countryside (p80)

To ensure that this policy cannot be seen to contradict the proposed garden neighbourhood policy for Felixstowe North the Town Council requests a minor addition as follows: “Outside of the defined Settlement Boundaries, **other than new allocations in this plan**, new residential development will be limited to:”

Policy SCLP5.7: Infill and Garden Development (p86)

We suggest a minor amendment to 5.7(c) to instead read: “There would not be **significant** impact to residential amenity of occupants of either the existing or proposed dwellings;”

Policy SCLP5.8: Housing Mix (p90)

The Town Council queries the rationale behind this significant change of emphasis from the policy established in the 2013 Core Strategy. Policy 5.8 refers to Table 5.1 which dilutes the emphasis on 1,2 and 3 bedroom with a corresponding increase from 20% to 28% of 4 bedroom homes (note: the table should refer to “4+” bedrooms, not “4”). The Local Plan should have a specific policy on smaller homes for younger people and those wishing to downsize. The removal of Permitted Development rights should be considered as a condition on some smaller homes to ensure that they can remain as such.

Policy SCLP5.9: Self Build and Custom Build Housing (p91)

A variety of options need to be considered to meet demand, such as innovative housing projects and good quality factory-built housing.

Policy SCLP5.10: Affordable Housing on Residential Developments (p93)

Whilst Felixstowe Town Council agrees with the aims of this policy, proposals which meet the criteria often cite ‘viability’ to circumvent the need to provide affordable housing on development sites. It is essential that affordable housing provision is agreed at the earliest opportunity in the planning application process and supported via a robust policy that ensures their delivery. S106, CIL or commuted sums should be reinvested in the community from which they originate.

Policy SCLP5.12: Houses in Multiple Occupation (p96)

There needs to be a strong mechanism to ensure that privately owned HMOs are of a good standard both in terms of the built provision, communal/amenity space for occupants and its subsequent management.

Policy SCLP5.15: Residential Moorings, Jetties and Slipways (p98)

Felixstowe Town Council is pleased to note that this policy supports the replacement of existing houseboats rather than further expansion. Houseboats, where appropriate, are part of the character of Felixstowe Ferry.

Tourism

There needs to be a stronger and better evidence for the core importance of tourism to the economy of the district and wellbeing of communities.

Policy SCLP6.1: Tourism (p104) and Policy SCLP6.2: Existing and New Tourism Attractions (p106)

Given the significance of tourism to Felixstowe, the Town Council is pleased to note the aims within these policies; particularly the support for local management of the resort and the development of out of season opportunities. It is important that consideration be given to the nature and type of attractions that would work in the different areas of Felixstowe and the policy should guide development opportunities in this way.

Policy SCLP6.5: New Self-Catering Tourist Accommodation (p110)

The tourism offer in Felixstowe is different to that of other parts of the District and the variety across the whole of the town - not just the seafront area - should be taken in to consideration. From caravans, self-catering and 'Airbnb' style options to budget and luxury hotels, the objective should be to provide a variety of accommodations which can appeal to a range of tourists and promote longer stays in Felixstowe.

Policy SCLP6.6: Existing Tourist Accommodation (p111)

Felixstowe Town Council agrees that it is preferable to protect existing tourist accommodation from conversion/redevelopment; however, we question whether this is achievable through policy alone.

Transport

Policy SCLP7.1: Sustainable Transport (p114)

Whilst the Town Council supports the principle of promoting alternative modes of travel, it is also pragmatic to recognise a significant number of people prefer or need to use a car. Felixstowe Town Council therefore asks this policy more realistically addresses this reality to ensure that new developments provide adequate parking and suitable road widths.

Community Facilities and Assets

Policy SCLP8.2: Open Space (p123)

Felixstowe Town Council strongly supports this policy as, in accordance with our comments to SCLP3.6, there is a general need for existing open spaces to be preserved, enhanced or otherwise re-provided to ensure that all residents have easy-access to informal recreational green space. In Felixstowe, this is particularly relevant in respect of the Grove woodland and Eastward Ho open space.

Policy SCLP8.3: Allotments (p124)

Felixstowe Town Council supports the policy.

Policy SCLP8.4: Digital Infrastructure (p125)

Mobile, Broadband and digital TV communication is a particular issue in a number of locations in Felixstowe and it is essential that this be improved for the economic development and wellbeing of the town.

Climate Change

Policy SCLP9.3: Coastal Change Management Area (p134)

CCMAs should only be applicable to areas “likely to be affected by physical changes to the coast” (NPPF para 106). That is not the case where the Shoreline Management Plan policy is to “Hold the Line”. Hence, we believe that CCMA details are not relevant for the vast majority of Felixstowe as we expect an ongoing policy of ‘Hold the Line’ for the town.

Policy SCLP9.5: Flood Risk (p140)

Felixstowe Town Council supports this policy.

Built Environment

Policy SCLP11.1: Design Quality (p160)

The Local Plan should encourage developers to be more creative, promote diversity of design and support the District Council to be proactive in matching quality developers to potential development projects. Developers should be provided with an outline design brief for each area to ensure high-quality design and large housing developers should be discouraged from using national standard designs.

Policy SCLP11.2: Residential Amenity (p161)

Felixstowe Town Council supports this policy.

Policy SCLP11.3: Historic Environment (p162)

Felixstowe Town Council supports this policy.

Policy SCLP11.5: Conservation Areas (p165)

Felixstowe Town Council supports this policy.

Policy SCLP11.6: Archaeology (p167)

Felixstowe Town Council supports this policy.

Policy SCLP11.7: Parks and Gardens of Historic or Landscape Interest (p168)

Felixstowe Town Council supports this policy, with particular interest in the historic seafront gardens.

Policy SCLP11.8: Areas to be Protected from Development (p169)

The Town Council is pleased to note the intention to protect the individual character of settlements and that areas have been designated to prevent coalescence between Felixstowe and its neighbouring villages.

Area Specific Strategies

Policy SCLP12.2: Strategy for Felixstowe (p182)

Firstly, with reference to the “13.1km travel to work” infographic on p179, we would wish to see an analysis of the inward and outward commuting.

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The strategy policy itself should clearly reference the importance of tourism. E.g. “The vision for Felixstowe will be to retain its role as a **thriving coastal resort and major centre** with a comprehensive range of services...”

The Town Council requests several enhancements/additions to the following elements of the policy as currently proposed:

- a) Employment opportunities are maintained to support the operations of the Port of Felixstowe and a wider range of employment types, **including tourism and tech-related enterprises**, and sites are created across the town;
- (f) The resort continues to flourish and opportunities for regeneration **and additional tourist attractions** are brought forward;
- (i) The risk of flooding **and coastal erosion** is carefully overseen
- (j) Residential opportunities are provided to meet the needs **in particular of younger people entering the housing market and those of** an ageing population and changing demographic over the plan period. *(in accordance with para. 12.24)*
- (additional item) **k) Open spaces are preserved, enhanced or otherwise re-provided to ensure that all residents have easy-access to informal recreational green space.**

Policy SCLP12.3: North Felixstowe Garden Neighbourhood (p187)

The North Felixstowe Garden Neighbourhood concept presents a unique opportunity to provide an iconic gateway to the town and the masterplan should address this by pursuing high-quality design throughout. Felixstowe Town Council believes that the aspirations of para.12.34 as fundamental to the success of the North Felixstowe Garden Neighbourhood and would like to see this strengthened and prioritised within the Local Plan as it is essential that the masterplan establishes close links to the town centre and heart of Felixstowe. The policy should also be clear about the specific requirements to achieve this, for example, the potential to provide a cycle/footbridge over Candlet Road. A site specific S106 agreement should be secured and tied to this development as opposed to the reliance on the Community Infrastructure Levy from which funds could be used towards projects outside of the Felixstowe area.

SCLP12.3(d) should be strengthened to read: “Appropriate **substantial** open space provision for both informal and formal recreational opportunities **to be retained or created.**”

SCLP12.3(j) should read: “Employment land **for high quality non-port related small business units**”.

With reference to the indicative draft masterplan shown on p188, the Town Council is concerned by the limited and compartmentalised vehicular accesses shown. The area needs to be fully interconnected, both with itself and the rest of the town. An appropriate highway/spine road running west to east to connect the disparate site locations should be considered.

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Felixstowe Town Council is concerned that the concept of the North Felixstowe Garden Neighbourhood is predicated on responding to a range of individual elements (e.g. a new leisure centre, the approval for development at the Cowpasture Farm site) however it is essential that it is developed as part of a consistent, design-led whole scheme.

Whilst the Town Council agrees with the principle of a garden neighbourhood concept approach we would wish to see a more appropriate name established for the overall site scheme early in the development process. Its name could perhaps refer to the Candlet area rather than 'North Felixstowe' and help create a sense of a community that is part of an integrated Felixstowe settlement area.

Policy SCLP12.4: Port of Felixstowe (p191)

The Local Plan should provide an introductory analysis of the port and logistics business and its regional and national significance to qualify the policies being proposed and to ensure that port expansion is enabled to continue.

Policy SCLP12.5: Land at Bridge Road, Felixstowe (p193)

Town Council is pleased to note that this policy has been carried forward from the Felixstowe Peninsula Area Action Plan.

Policy SCLP12.6: Land at Carr Road/Langer Road, Felixstowe (p195)

There is a long-standing aspiration to avoid HGV movements in to the more residential areas of Felixstowe and the Town Council is pleased to note that this policy has been carried forward from the Felixstowe Peninsula Area Action Plan.

Policy SCLP12.7: Land at Haven Exchange, Felixstowe (p197)

Town Council is pleased to note that this policy has been carried forward from the Felixstowe Peninsula Area Action Plan. However, there should be a reference made at para 12.63 to the recent, large scale, Lidl supermarket development.

e) Uses which are complementary to the Port of Felixstowe will be supported, excluding those which have a detrimental impact on residential amenity; **for example, uses involving HGVs.**

Policy SCLP12.8: Land at Brackenbury Sports Centre (p199)

Felixstowe Town Council generally supports the redevelopment of this site for housing but requests that SCLP12.8(a) be amended to refer to "a mix of housing should be provided on the site including housing for older people **and smaller starter home units.**"

Policy SCLP12.9: Land at Sea Road, Felixstowe (p201)

Town Council is pleased to note that this policy has been carried forward from the Felixstowe Peninsula Area Action Plan and has recently recommended approval for a development proposal for the site which meets the policy criteria.

Policy SCLP12.10: Land north of Conway Close and Swallow Close, Felixstowe (p204)

Para 12.96 appropriately refers to the need to integrate this site with the North Felixstowe Garden Neighbourhood. Consideration should be given therefore to

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incorporating the site within the masterplan for this area rather than retaining a separate policy.

The following policies have been carried forward from the Felixstowe Peninsula Area Action Plan:

- **Policy SCLP12.11: Felixstowe Ferry and Golf Course (p206)**
- **Policy SCLP12.12: Felixstowe Ferry Golf Club to Cobbolds Point (p207)**
- **Policy SCLP12.13: Cobbolds Point to Spa Pavilion (p208)**
- **Policy SCLP12.14: Spa Pavilion to Martello Park (p210)**
- **Policy SCLP12.15: Martello Park to Landguard (p211)**

Felixstowe Town Council supports the carrying forward of policies SCLP12.11-12.13 and SCLP12.15 from the Felixstowe Peninsula Area Action Plan.

In respect of Policy SCLP12.14, the site presents a once-in-a-generation opportunity for an ambitious, modern and iconic tourist attraction if a new leisure centre is to be located elsewhere. It is essential that the site be prioritised for this purpose and not left derelict. Felixstowe Town Council strongly urges that the policy mandates for a fitting redevelopment project to be appropriately timetabled to commence as soon as the site becomes vacant. Felixstowe Town Council also requests the District Council to consider a resort-focused masterplan for the whole south seafront area from Convalescent Hill to Martello Park.

Policy SCLP12.16: Tourism Accommodation in Felixstowe (p212)

Felixstowe Town Council supports this policy.

Policy SCLP12.30: Land at Innocence Farm (p255)

Felixstowe Town Council respectfully refrains from commenting on the suitability or otherwise for uses of land in other parishes. However, given that the Innocence Farm site has been identified for such a large-scale employment allocation in close proximity to Felixstowe for the express purpose of supporting the continued Port of Felixstowe, the Town Council has a legitimate interest in the policy for this site and the likely effect on Felixstowe in terms of the potential impact on the A14.

Though we acknowledge the clear impact on neighbouring parishes, Felixstowe Town Council is broadly in favour of this development in support of the expansion and continued success of the Port of Felixstowe.

However, it is critical that the extent and perimeter of the site pays the maximum respect to the environment and its neighbours.

Due to the anticipated 3,200 container lorries and 600 cars daily to and from the proposed site, the Town Council requests that the impact of this on the A14 is evaluated to take in to account the additional traffic which will be generated by ongoing port expansion projects, planned residential developments, Sizewell C and other growth factors.

Access options for the site are wholly inadequate as currently proposed and the Town Council strongly requests that the Local Plan mandate that an underpass be provided from the A14 for access to and from Croft Lane ahead of commencement of any development. Failure to do so will put unnecessary additional pressure on the

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Trimley (J59 – traffic from the site wishing to travel west) and Seven Hills (J58 - traffic from the Port seeking to access the site) junctions.

Any access via Kirton Road should be limited for emergencies only to protect the quiet character of this area, local school and safety of pedestrians, cyclists and other road users. Substantial landscaping will be needed to lessen the visual impact.

General Comments - Format

The paragraphs and policies are numbered in a similar way which can be confusing and potentially misleading. A clearer distinction should be employed in the final version. An alphabetical index should be considered as a useful tool to navigate a document of this size and importance.

Thank you again for the further opportunity to inform the Local Plan Review process. Give the significant proportion of housing and development being planned for Felixstowe over the next 18 years, the Town Council welcomes every opportunity to help shape local policy and support the best outcome for the area.

We look forward to hearing from you in due course.

DRAFT