

**MINUTES of a PLANNING & ENVIRONMENT COMMITTEE MEETING held  
ONLINE on Wednesday 7 October 2020 at 9.15am**

**PRESENT:** Cllr S Bird (Chairman)                      Cllr M Jepson  
               Cllr A Smith (Vice-Chairman)              Cllr M Morris  
               Cllr S Bennett                                      Cllr D Savage  
               Cllr S Gallant

**OFFICERS:** Mr A Tadjrishi (Town Clerk)  
                   Mrs S Morrison (Planning Administration Assistant)

**254. PUBLIC QUESTIONS**

None

**255. APOLOGIES**

Apologies were received from **Cllr S Wiles** and **Cllr K Williams**

**256. DECLARATIONS OF INTEREST**

<b>Member(s)</b>	<b>Minute No.</b>	<b>Nature of Interest</b>
Cllr S Bird Cllr S Gallant	All	Local Non-Pecuniary (as Members of East Suffolk Council)
Cllr S Bird	All	Local Non-Pecuniary (as a Member of Suffolk County Council)

As no Pecuniary declarations were made, there were no requests for dispensation.

**257. CONFIRMATION OF MINUTES**

It was **RESOLVED** that the Minutes of the Planning & Environment Committee meeting held on 23 September 2020 be confirmed as a true record.

**258. PLANNING APPLICATIONS**

Committee considered the following planning applications received since the last meeting and **RESOLVED** to submit the following observations to East Suffolk Council:

<b>A</b>	<b>DC/20/3625/FUL</b>   Conversion of existing house to 5 apartments and one new build dwelling <b>Tehidy House 65 Orwell Road</b>
<b>Committee recommended APPROVAL</b>	

<b>B</b>	<b>DC/20/3658/OUT</b>   Outline Application (Some Matters Reserved) - Residential development consisting of a pair of 3 bedroom semi-detached houses and 2no. 2 bedroom bungalows. Formation of upgraded vehicular access onto high street. <b>Land To The Rear Of 361-377 High Street</b>
<b>Committee recommended APPROVAL</b>	
<b>C</b>	<b>DC/20/3564/FUL</b>   Single storey front extension and two storey rear extension with raised roof to front with two balconies and internal alterations. <b>91 Cliff Road</b>
<b>Whilst we have no objection to all the other elements proposed we are recommending REFUSAL because of the rear balcony which, in our view, would cause unacceptable loss of residential amenity, contrary to SCLP11.2(a)</b>	
<b>D</b>	<b>DC/20/3595/FUL</b>   Proposed first floor windows, new pitched roof to garage and living area with associative works under permitted development <b>18 Fleetwood Road</b>
<b>Committee recommended APPROVAL</b>	
<b>E</b>	<b>DC/20/3662/FUL</b>   Single residential apartment <b>79 Hamilton Road</b>
<b>The Committee considered this application in the light of Policy 4.9 and therefore recommended APPROVAL.</b>	
<b>F</b>	<b>DC DC/20/3553/FUL</b>   Proposed extension to existing balcony to front of dwelling (to match neighbouring property) <b>69A Cliff Road</b>
<b>Committee recommended APPROVAL</b>	
<b>G</b>	<b>DC/20/3668/FUL</b>   Proposed dormer construction to side of dwelling to accommodate mobility lift. <b>69A Cliff Road</b>
<b>Committee recommended APPROVAL</b>	
<b>H</b>	<b>DC/20/3634/FUL</b>   New Garden Room <b>8 College Green</b>
<b>Committee recommended APPROVAL</b>	

I	<p><b>DC/20/3650/FUL</b>   Erect single storey pitched roof extension to rear of property to provide lounge area. Convert part of lounge to bedroom.  <b>49 Westmorland Road</b></p>
<p><b>Committee recommended APPROVAL</b></p>	
J	<p><b>DC/20/3763/FUL</b>   To construct a single storey Conservatory extension to the rear of the property with a Lightweight tiled roofing system. Proposed structure to be 4250mm x 2750mm. Part of the Development is to cover part of the previous side extension on the property and will therefore project from the side of the original dwelling house by approximately 2000mm.  <b>43 Roman Way</b></p>
<p><b>Committee recommended APPROVAL</b></p>	
K	<p><b>DC/20/3764/FUL</b>   Proposed single storey part rear/part side extension  <b>16 Dovedale</b></p>
<p><b>We believe that this proposal would result in overdevelopment of the site and be intrusive to the neighbour to the east. We therefore recommend REFUSAL with reference to policies SCLP 11.1(c)i-iii and SCLP11.2(e)</b></p>	
L	<p><b>DC/20/3592/TCA</b>   Ranelagh Road council car park 1 x Oak - Crown reduce and shape by up to 30% Reason: to reduce overhang and improve light into garden  <b>Car Park Ranelagh Road</b></p>
<p><b>Committee had NO OBJECTION to the work proposed subject to the guidance of the East Suffolk Council's Arboricultural Officer.</b></p>	
M	<p><b>DC/20/3782/TCA</b>   Fell T1, T2 &amp; T3 Sycamore. These 3 trees are growing on, or adjacent the retaining wall that borders / forms the boundary between South Beach Mansion and the Pram Walk. The wall is an integral part of the designed Victorian landscape / setting, whereas the trees have naturally generated and are likely to damage the wall, either as a result of secondary thickening of stems / buttress roots, or root plate failure, resulting in a tree breaking part of the wall as it falls. T1 also has a significant lean that has an over-bearing and oppressive effect on the frontage courtyard to South Beach Mansion. T2, is growing out of the wall and appears to be forming buttressing that is reliant on the wall structure, rather than surrounding ground. T3 has partially compromised buttress roots relating to the path edging structure. T3 is in poor physiological condition, with sparse crown, stunted foliage and die-back. T1 also has sparse upper-canopy growth.  <b>Proposed Flat 1 Former South Beach Mansion Bent Hill</b></p>
<p><b>Committee had NO OBJECTION to the work proposed subject to the guidance of the East Suffolk Council's Arboricultural Officer.</b></p>	

## **259. PLANNING DECISIONS**

**RESOLVED** that the decisions received from East Suffolk Council since the date of the previous agenda and up until the date of the agenda for this meeting be noted.

## **260. CONSULTATION: DRAFT COASTAL ADAPTATION SUPPLEMENTARY PLANNING DOCUMENT**

Committee received a presentation from Cllr Smith on a new Supplementary Planning Document being drafted on behalf of East Suffolk Council, Great Yarmouth Borough Council and North Norfolk District Council on Coastal Adaptation.

It was noted that, when adopted by ESC, it would have weight in both Local Plan Preparation and Development Management as local planning policy supplementary to the current Local Plan.

Cllr Smith advised that Coastal Partnership East had not yet drafted a new document but were consulting on potential topics or contents to be included. Closing date for contributions was 16<sup>th</sup> October 2020. As such, a report had been drafted for Members and circulated for the meeting.

Members thanked Cllr Andy Smith for his hard work and expertise on this matter.

**It was RESOLVED that the following response be submitted on behalf of Felixstowe Town Council:**

### **1 Introduction**

The Town Council welcomes the recent adoption of the Suffolk Coastal Local Plan 2020 and in particular the section on Climate Change and Coastal Issues. The Town Council has declared a Climate Change Emergency. We are therefore fully supportive of that, and thereby also of the proposal to publish a new Supplementary Planning Document (SPD) on Coastal Adaptation.

While the implications of Climate Change and consequent Coastal Adaptation are very different for our town to those faced by some more rural areas Climate they are in other ways a very important issue for a resort town such as Felixstowe whose livelihood depends on our being able to operate as a resort and a port, in particular in the context of potential Sea level Rise over the next 100 years.

Hence the town is not immune to the need to consider the potential needs for adaption, on a view of decades up to 100 years, especially in regard to Sea Level Rise (SLR).

## 2 Overview of the proposed SPD

We welcome the early and wide-ranging structure of the draft consultation and will use the requested questions as our prime vehicle to comments. Those comments will of course be primarily on those slightly different aspects which are relevant to our area.

We note that the NPPF, the new SCDL LP and indeed the proposed title of the SPD itself cover Coastal Adaptation in a variety of contexts, not only regarding CCMA's. The current draft appears to be narrower in approach, specific to CCMA's. We suggest the wider Adaptation issues should be included, notably adaptation in HTL areas such as coastal resorts, and others.

In that context an overview of the situation for Felixstowe may be helpful.

In Felixstowe, fortunately but unsurprisingly, the whole frontage of the town, other than short stretches on the southern bank of the Deben and at Landguard Common Hold The Line, so the CCMA is not directly relevant. For Felixstowe, the direct significance of the above is quite limited in comparison to some communities for whom it is potentially terminal. However, there are some aspects of Adaptation specific to our circumstances for which we seek recognition.

The current sea defences are recent and designed to a high standard, and appear to be holding up very well, so a reasonable working assumption would be that the fundamentals of the Town's protection are in place, but may need maintenance or upgrades, particularly from Cobbolds Point to Clifflands.

However, that is not the whole story. The promenade, or actually the sea wall beneath it, have proved effective now for 107 years, with no occasion, including 1953, having resulted in a mean water level being higher, although the current margin is slight – we have some half dozen occasions in the last 20 years when the tide height has been with may be 20cm of the promenade sea wall.

Accordingly:

- Significant damage to the immediate hinterland from wave action has occurred and is likely to increase in both severity and frequency as climate change takes effect.
- On a medium-term timescale, Sea Level Rise will make it necessary to raise the level of the defence on the promenade, certainly north of the pier.
- The South area remains vulnerable to a very low risk of a very severe flood event. Specific guidance is sought in the SPD in regard to development in that area being safe from a very severe storm event, albeit that the risk of that is low.

The SPD should contain advice on the interpretation of current policies for those circumstances, either in generic sections outlining these types of risk and / or on local specific discussions.

### **3 Response to the Consultation Questions:**

#### **1. Do you consider the scope and proposed content of the SPD to be appropriate?**

No.

We agree with the content topic proposed, but believe the wider public would be well served by a section overtly specific to Sea Level Rise, and what an appropriate level may be relevant to be taken into account over a 100 year time scale. We note the figure currently used by the Environment Agency as general guidance is of the order of 0.7m over 100 years.

#### **2. Are there any elements of National or Local Planning Policy which should be particularly emphasised/explained in the SPD?**

Yes.

The governance of Coastal Management, let alone with the inclusion of Adaptation, is complex and very hard for lay people to understand. We believe a section should be included explaining the core principles – as clearly and briefly as possible.

E.g. Coastal Management, and as part of that Coastal Adaptation, have emerged as concepts over the past 15 years or so, replacing previous separate approaches for “Flood Protection” in respect of areas liable to tidal flooding and separately “Coast Protection” – protecting higher coastal land from loss by erosion. Land use planning had traditionally been a separate topic.

Four strands of law and regulation cover those issues, with Responsible authorities being:

- Flood protection: The Environment Agency (EA)
- Coast Protection: District & Unitary LAs, as Coast Protection Authorities (CPAs), under the 1949 Coast Protection Act
- Planning; District & Unitary LAs, as Local Planning Authorities (LPAs).
- Marine ecology and management (the MMO)

Within the Planning section, reference should be made to:

- The relevant NPPF sections, particularly paragraph 160(b) – “Developments should be safe for their lifetime.” (our perception of some recent planning applications has been that too much reliance has been given to the sequential test in isolation, without the overriding “safe” factor of 160(b))
- Shoreline Management Plans and their role as a non-statutory evidence base., including the meaning, with examples, of the 3 policy options.

Links to relevant documents: NPPF, SMP, role of Estuary and other flood plans.

**3. What guidance for development in the Coastal Change Management Area should be identified in the SPD?**

The SPD should outline all relevant guidance, not only from Planning documents but also from the EA, LLFAs, MMO, NE, AONB in order to assist applicants and planning officers to consider all cohesively. Reference should be made to the Coastal Concordat.

**4. Are the categories identified in section 3 appropriate and comprehensive or should others be identified?**

The CCMA headings are appropriate.

However, the LP rightly allows for Erosion Vulnerability Assessments to be required in certain locations in HTL areas. That should be explained, with examples. Other similar issues, e.g. the 30m Access Zones should be explained, whether in this section or perhaps better in a section dedicated to adaptation in HTL areas.

**5. What guidance on temporary development within the CCMA should be included?**

No comment

**6. What elements should be included within a Coastal Erosion Vulnerability assessment?**

The local geology, and erosion history, should be required to be investigated, with appropriate evidence bases.

**7. What guidance on Roll-back and relocation options should be included?**

No comment – this is not currently relevant to Felixstowe - long may that remain so.

**8. What guidance on enabling development should be included?**

See comment (7)

**9. What case studies should be used in this SPD to demonstrate coastal adaptation best practice?**

In regard to safety in HTL areas, 2 cases demonstrate options:

- i) Martello Park Felixstowe
- ii) Adastral Close Felixstowe (Orwell Housing Assn)

**10. Do you have any other comments which could help the partnership prepare the SPD?**

A) Mapping

Good mapping is desperately needed, and essential, including but not limited to:

Precise seaward and landward extent of the CCMA's 30m zone. The mapping on the LP is inadequate. This should be done at scales appropriate to the area involved: in built up areas large scales are essential.

For HTL areas, the new LP extends part of the concept from the CCMA to define an area of typically 30m from current defences to ensure future maintenance access is not inhibited, and where appropriate to require Erosion Vulnerability Statements to be provided in planning applications. The SPD should map those areas at large scale so that all parties can see the implications clearly.

Similarly, "coastal maps" for individual areas should clearly incorporate the SMP designations, at scales appropriate to the type of location.

They should also contain easily used links to the current EA Flood Zone mapping, or software can be utilised, direct to that from the EA website.

B) Implications for resort frontages.

In coming decades seafront infrastructure will be directly affected by Sea Level Rise. Promenades and their immediate hinterlands (e.g. in Felixstowe the Spa Gardens) will need to adapt. Higher and more robust structures will be needed to protect the usability of current assets, possibly glass flood walls, or other wholly new thinking. While this is hopefully some decades away, current maintenance and development of resort facilities should be aware of these future issues. In particular the decorative walls to the rear of Felixstowe promenade will need to be replaced with wave-resistant structures, possibly within a decade. Whether by general phrasing, or by locally specific sections, these issues should be outlined.

C) Flood risk in South Felixstowe.

In South Felixstowe we have a situation with a very low risk of a very severe flood event. i.e. there are two scenarios which the SPD should include in planning advice:

- i) A very exceptional tidal event could, even today, generate tides a further metre above previous events, and that will become progressively more likely over time. In that event flooding in the Langer Road area could be a metre more severe than in 1953.
- ii) Even in a less severe event, the possibility should be accounted for that the existing defences could fail, either by damage from severe wave action, or by an operational failure if the flood gates were not close for some unforeseen reason, including the eventuality that severe



weather could impede access to the town for Norse / EA staff to close the gates.

With the current recent change to EA Flood mapping, the area has been reduced from Flood Zone 3 to Flood Zone 2, apparently because the mapping omitted the presence of defences along the frontage, as indeed also on the Golf course frontage. Hopefully that will be reversed – it is under investigation. However, the SPD should reinforce NPPF advice that developments in such areas should be “safe for the lifetime of the development. That should encompass no sleeping accommodation on the ground floor, and no single-storey residential accommodation without an internal escape route to first floor level. We believe this type of advice is properly admissible under the NPPF and does not constitute “new policy”.

## **261. CONSULTATIONS: CHANGES TO THE CURRENT PLANNING SYSTEM**

The Chairman advised the Committee that he, Cllr A Smith, Cllr K Williams, the Clerk and Planning Administration Assistant had met on 23 September to review the planning white paper, with matters of potential interest circulated to Committee Members. It was agreed that a further workshop for Members be held at 11am on 14<sup>th</sup> October 2020 to review the consultation questions. Following this, a draft response would be presented to Committee on 21<sup>st</sup> October for approval prior to submitting the response from Felixstowe Town Council before the deadline of 29 October 2020.

**It was RESOLVED that the arrangements proposed for the Council’s response to this consultation be approved.**

## **262. CORRESPONDENCE**

The Town Clerk advised that the Deben Estuary Partnership had started work on a revised Deben Estuary Plan and had asked for a representative from Felixstowe Town Council to participate with a particular focus on Felixstowe Ferry. Members proposed that Cllr Smith should represent the Council on the Deben Estuary Partnership.

**It was AGREED that Cllr A Smith would represent the Town Council on the Deben Estuary Partnership.**

## **263. CLOSURE**

The meeting was closed at 11.15pm. The date of the next meeting was noted as being Wednesday 21 October 2020, 9.15am.

---

Date: \_\_\_\_\_

Chairman: \_\_\_\_\_