Kirton & Falkenham Parish Council response to the SCDC Local Plan Issues and Options document public consultation August/October 2017

23rd October 2017.

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This is the response of Kirton & Falkenham Parish Council to Suffolk Coastal District Council to the document ‘Issues and Options for the Suffolk Coastal Local Plan Review V2, August 2017’. A village meeting held in September was attended by over 140 villagers and helped the parish council to form this response.

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SCDC have set a challenge with this consultation. The 173 page Issues and Options document asks 144 questions, many requiring prior and in depth knowledge of background information to comment. The evidence base documents are hundreds of pages long whilst the site sustainability document is over 1,700 pages long.

The recurring proposal for Innocence Farm (site 706) once again appears and has so many issues and unsustainable elements that the Parish Council has devoted the first section of its response to this. The site is approximately 40 times the size the Ipswich Economic Area Sector Needs Assessment Final Report document within the SCDC evidence base states is required for net growth, or 76 times if we take into account the document’s estimate for freed up brownfield land. The base data used by the document is the EEFM 2016 Suffolk Coastal Warehousing forecast, which shows the requirement for total warehousing floorspace steadily reducing between 2014 and 2036. The site is next to a primary school, which would be severely affected by fumes from slow moving vehicles accessing and on the site, and as inadequate access to the A14 in one direction and no access in the other direction.

The EEFM data gives an explanation as to why existing planning permissions that SCDC have granted have not yet been able to attract development investment to implement.
The Parish Council then comments on all the sites within and in the neighbourhood of the villages’ boundaries. In this document there is a summary addressing each site. An accompanying document is an edited version of SCDC’s “Initial Sustainability Appraisal Site Assessments” with the Parish Council’s amendments in red. There are some disappointing elements to the rigour of SCDC’s appraisal. For example, almost every site is marked a “double plus” for education and skills improvement with the justification “primary school within 5 miles and secondary school within 8 miles of the site”. Ignoring the fact that the primary school is full, due to the recent increase in housing; SCDC must be setting a very low benchmark on education by awarding the highest educational and skills improvement rating to sites simply because schools exist within 8 miles.

The evidence base for jobs growth reveals inconsistency in the input data and that much of the input data is several years or more out of date. The Parish Council highlights several of these areas it regards as requiring attention.

The Parish Council notes that SCDC, in the Issues and Options document, aim to secure increased jobs by allocating large amounts of extra land for port, warehousing and logistics. However, the evidence bases it uses states that “It is important to emphasise the uncertainty associated with this higher growth scenario particularly in terms of assumptions regarding overall employment, regional retention and port distribution.” (Executive summary, Employment Land Needs Assessment, March 2016). Further the existing very low employment per square metre of these sectors, which is recognised by the consultation documentation, is liable to dramatically reduce due to automation and remote working, neither of which are mentioned in the evidence base.

Price Waterhouse Cooper estimate the job reductions in this sector due to automation as 56%. The likelihood of achieving jobs growth, or significantly reducing local job losses in this sector no matter the land made available, is doubtful.

Finally, the Parish Council attempts to address the 144 questions asked in the consultation.
2. **Response to site 706 “Innocence Farm near Kirton”**

**Objection Summary**

The PC objects strongly to this site on the grounds of unacceptable process, lack of information on need and the impact on the community; especially traffic fumes, light and noise pollutants. It would represent a ribbon development linking Felixstowe to Ipswich, damaging the separation and character of two very different centres.

The ratio of port activity to land is much lower currently than in the past, whilst at the same time the Port and Bidwells/Trinity College appear not be progressing developments for port related facilities on both greenfield and brownfield land in accordance with previous planning permissions. It is unfortunate that the evidence base for the Issues and Options document has not included this information nor the considerable acreage and floor space it represents. The issues are so great that the PC cannot see a basis for SCDC giving approval for Bidwells to progress this to the scoping stage.

For SCDC to give any positive indication to this proposed site, when the base data that its consultation uses shows a range of negative to slight growth for warehousing floorspace requirements, and where there are unused permissions, especially unused permission in respect of brown field sites, would be perverse.

**Documents submitted by Bidwells in support of this site proposal.**

1. A letter from Bidwells (3/1/17) states that there have been discussions between Bidwells and SCDC. The letter from Bidwells (22/8/16) refers to the proposal following a meeting between SCDC at the Port of Felixstowe in April 2016 and that joint scoping meetings with SCDC should be held. There has been no release of the contents or outcomes of these discussions. The PC requested in January 2017 that SCDC sent to the PC copies of minutes of all such meetings SCDC did not respond.

2. Bidwells (3/1/17) state that SCDC have offered a previous opinion on the proposed development or one at Christmasyards Wood – the wording is ambiguous. It states that Bidwells have taken their lead from SCDC’s previous opinion. This has not been made available to consultees; please can this be provided since it is essential that consultees are aware of this opinion.

3. Bidwells (3/1/17) states as an essential feature that car access is via Kirton Road, and then states that current thoughts are for this not to be the case. Given that the supporting document to this site proposal is contradictory in this respect, it is respectfully suggested that SCDC can do little other than reject it.
Strategic Case

1. The application sets out at some length the historic growth of land use of the port and port related activities – graph below; but it is seriously deficient in that it does not provide any information on the historic throughput which is generating the ‘intense’ and ‘urgent’ pressure.

However, the government does provide information (Government Port Freight Statistics: final figures 2016) which is represented in the graph below.

As can be seen, the maximum throughput was in 1999 and the throughput at the end of 2015 was well below this. The port operation land area in 1999 was approximately 70 Ha lower than it is currently. In summary at the end of 2016 its throughput was approximately 10% less than current whilst using approximately 25% less core port operations land than current. This entirely undermines the claim of an urgent and intense need due to growth.
Future Land Growth

Current planning permissions not progressing:

1. Port Logistics Area:
   SCDC has granted planning permission for the development of the Port Logistics Area within the port site. The Port has reported that, due to the economic environment, investors for this development have backed out and that they are not progressing as per the planning permission, but that smaller scale developments are now being considered.

2. Universe/Clicketts Hill:
   SCDC has granted planning permission for a third-party logistics centre warehouse at Clicketts Hill, believed also to be a Bidwells/Trinity College site. The Port has reported that, due to the economic environment, investors for this development have also backed out and that they are not progressing as per the planning permission.

3. Brownfield Sites:
   Plan 2 of the application shows large hatched areas of Potential Container Storage, Potential Haulage Zone and Potential Warehousing, which are brownfield sites within the current port site that are not currently being developed.

Summary:
Until Bidwells, Trinity College and the Port of Felixstowe have developed sites with existing planning permissions and long-term brownfield areas within the port boundary, it would be irresponsible to approve in principle or give encouragement for further planning permission applications for greenfield sites, such as this. The EEFM data gives an explanation as to why these existing planning permissions that SCDC have granted have not yet been able to attract development investment to implement.

This application could be considered as a process of land banking; i.e. creating a portfolio of greenfield sites with planning permission, whilst leaving brownfield sites which are probably costlier to develop. It is scandalous that SCDC is considering land banking in the Issues and Options document (Q63: Should the Local Plan allocate more land than is required for employment uses or should we only allocate what is needed?). Such a policy would knowingly create unnecessary planning blight. Further, to give such approval or change in designation of large areas of land, when its consultation is based upon data showing a reducing warehousing requirement in the District, would possibly be considered unjustifiable and reckless, and potentially expose the Council to actions and legal claims for damages for surrounding residencies consequentially affected by planning blight.

Evidence Base of Employment Land Need

The SCDC Evidence Base for the Issues & Options document includes the Ipswich Economic Area Sector Needs Assessment Final Report, September 2017. Table 6 in section 3.23 is “Table 3.6 EEFM Baseline Employment Space Requirements 2014 – 2036” and contains the following for SCDC;

B8 – Distribution (General, Smaller Scale) 24,380 sq.m.
B8 – Distribution (Larger Scale, Lower Density) 6,940 sq.m.
A total of 31,320 sq.m. for the sector, which is approximately 3 hectares.
The same table estimates a reduction in B1C/B2 industrial land of 15,980 sq. m., approximately 1.5 hectares of freed brownfield land, which give a next greenfield land forecast of approximately 1.5 hectares. The site 706 application is for 115 hectares, 76 times the size forecast as needed by SCDC.

SCDC states in the Issues and Options document (P16) that “For jobs, the Councils have three key evidence documents: jobs calculations produced using the East of England Forecasting Model (EEFM) (August 2016), and two studies: the Employment Land Needs Assessment (2016) and Employment Land Supply Assessment (2017)”.

The data in the 2016 EEFM includes historical and forecast data for warehousing floorspace requirement in Suffolk Coastal. The table below is a tabulation of that data. As can be seen, the requirement for floorspace for warehousing in Suffolk Coastal is forecast to steadily reduce between 2014 and 2036.

![Suffolk Coastal Warehouse floorspace area estimates](chart.png)


### Highways

1. The traffic plan has been poorly thought through and is badly flawed. No encouragement for further work should be given unless this has been adequately addressed.

2. The supporting document for this site proposes 3,200 HGVs and 600 car movements per day; i.e. one every 10 seconds should 24-hour working be permitted. The proposed access, initially via two small access roads serving Kirton, is clearly impractical; the roads have weight restrictions width restrictions and are used for domestic and farm purposes, as well as the school run and by cyclists and horse riders.

3. There is no access to Croft Lane from the port direction, so all traffic from the port would need to go to the Seven Hills junction turn 360 degrees and return, that going from the proposed site towards Ipswich would need to go to the Trimley or Dock Spur roundabouts; doubling the increased traffic between the junctions and increasing congestion on the Seven Hills roundabout, which is already heavily congested at peak times.
4. The impact on narrow village roads would be extreme, the impact on the A14 and the Seven Hills and Trimley/Dock Spur roundabouts, with consequential slow moving, polluting tailbacks; the generation of pollution by slow moving diesel engines would be very significant.

Environment

1. Noise and light pollution. The Parish Council has repeatedly indicated to Bidwells and Trinity College that a great concern is not only visual impact, but also noise and light pollution. Both are very insidious and extremely difficult to mitigate. It is very disappointing that these have not been addressed in any way.

2. The impact of diesel fumes has received a great deal of attention recently. What is becoming crystal clear is that living in areas affected by diesel pollution will have a major impact on human health, particularly in the case of children. Five studies are listed below by way of example. The PC would suggest that the consultation must address each of the issues raised in these studies.
   a. **Cancer risk.** Cancer UK has estimated that pollution accounts for 3,500 cases of lung cancer each year (The Times, 12 August 2017).
   b. **Heart disease.** A study by Queen Mary University of London and Oxford University has shown that particles emitted by diesel engines have been linked with unusual cardiac growth (The Times, 27 April 2017 and 29 May 2017).
   c. **Dementia Risk.** “The evidence from experimental work suggests that ultra-fine particles from engines do get taken up through the lungs, circulate in the body and produce inflammation,” “That has been implicated in a variety of diseases and it now appears we have evidence that would suggest a similar link for dementia.” (The Times, “Busy roads put millions at higher risk of dementia”, 5 January 2017 citing Calderón-Garcidueñas, Lilian et al., “Living close to heavy traffic roads, air pollution, and dementia”, The Lancet, January 2017).
   d. **Coughing and wheezing.** Diesel fumes contain chemicals that directly stimulate the nerves responsible for the coughing and wheezing reflex according to a study by Imperial College, London (The Times, 1 May 2017).
   e. **Sleep.** High levels of air pollution significantly affect the ability to sleep (The Times, 22 May 2017)

The proposed logistics facility reaches the edge of Trimley St. Martin and is very close to its school. The enormous quantity of traffic, in particular of slow moving vehicles within the facility, would emit considerable quantities of carbon monoxide, nitrogen dioxide, PM10 and other pollutants into the ambient air of the school and nearby. SCDC and SCC’s responsibilities are recognised in the website, but their responsibilities for pollution go far beyond what is stated.

The DEFRA report (“Draft plans to improve air quality in the UK, tackling nitrogen dioxide in our towns and cities, UK overview document”, DEFRA, September 2015 ) addressing EC Directive 2008/50/EC and the 2010 Air Quality Standard Regulations (2010/1001) require the drawing up of plans which limit the levels of such pollutants. A new plan was published by DEFRA in July 2017 which emphasised the responsibilities of local authorities in reducing exposure to pollutants.

To permit development which led to an increase in pollutant levels in close proximity to rural villages and a primary school would be both irresponsible and contrary to central government policy. It might also invite legal challenge from those concerned with limiting vehicle exhaust emissions and potentially expose the District and County Councils to damages actions by those whose health is adversely affected by the development.
3. **Response to the “Initial Sustainability Appraisal Site Assessments August 2017” document, for sites in and adjacent to Kirton & Falkenham.**


The following is a summary:

976. **STRONGLY NEGATIVE.** Ribbon development which would significantly link Kirton & Falkenham, adversely affecting their different characters. Loss of high quality agricultural land.

327. **NEGATIVE.** Isolated from the village. Lack of viable access for employment use.

362. **NEGATIVE.** Isolated from the village.

552. **STRONGLY NEGATIVE.** Ribbon development which would significantly link Kirton & Falkenham, adversely affecting their different characters.

654. **STRONGLY NEGATIVE.** Site lies within an SLA and is a key visual amenity.

754. **STRONGLY NEGATIVE.** Key visual amenity for an SLA. Subject to flooding and Ordnance Survey documents a spring.

755. **STRONGLY NEGATIVE.** SCDC reports it would increase pollution and the site is subject to flooding, it would impact major landscape sites. The size would impact the village greatly. Ribbon development would fragment village further.

856. **STRONGLY NEGATIVE.** Access would appear to be extremely difficult. It is believed to be near a sewage pump. Part of it is landfill.

1037. **STRONGLY NEGATIVE.** SCDC point out it is close to an important listed building and it would impact major landscape sites. Has surface water flooding. The size would impact the village greatly.

1077. **NEGATIVE.** SCDC point out it will increase emissions and it would impact major landscape sites. Has surface water flooding.

356. **STRONGLY NEGATIVE.** SCDC point out that part of the site is prone to flooding. It is believed that it also has surface streams. Contains habitats for protected species. This site abuts Kirton, Falkenham and Trimley St. Martin. It will therefore link these villages and lose their distinctiveness; the three villages have very different character.

364. **NEUTRAL IF DESIGNATED FOR PARKING.** Adjacent to the school with major traffic and parking problems. If the site is developed it should be as a school parking and/or drop of facility. Does contain some protected species.

497. **NEGATIVE.** SCDC point out it will increase emissions, is on greenfield land and would be ribbon development. Protected species.

706. **EXTREMELY NEGATIVE.** See detailed submission by PC. Very serious risk of pollution; adjacent to homes and school. The site owner’s proposal is to for 3,200 lorry movements per day to access the site only be turning left; requiring double the traffic on the roundabouts and stretch of the A14 for traffic come from the ‘wrong direction’; for example, traffic coming from the port would need to
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go along the A14, U turn at the A12 roundabout, then come back along the other carriageway of the A14. Loss of agricultural land. The site is approximately 40 times the size the one document in the evidence base states is required by 2036, or 76 times the required size if the land identified by SCDC as brownfield land to be freed up is utilised. The EEFM 2016 base data shows that no extra floorspace is required, the total need reducing up to 2036.

225. STRONGLY NEGATIVE. Access to the site via Church Lane is so narrow that a car cannot pass a pedestrian and if two cars meet, one must back up all the way to the exit of the road.

553. STRONGLY NEGATIVE. Access to the site via Church Lane is so narrow that a car cannot pass a pedestrian and if two cars meet, one must back up all the way to the exit of the road.

347. NEGATIVE. Will create pollution and traffic. Loss of agricultural land.

Out of date evidence base data

The evidence base on housing and employment land needs is based upon the ONS Blue Book of 2015. Given the changes in political and economic situation since 2015, including the Brexit impacts, the forecasting needs to be revised in line with the current ONS Blue Book, which has significantly updated figures which will affect the estimates of jobs and housing need to be taken forward into the Issues and Options document.

The evidence base is also based upon OECD GDP forecasts published in 2014 (page 16, figure 3.1, Employment Land Needs Assessment, March 2016). Again, this need updating.

The basis for employment growth is UK growth. The OBR forecast in the evidence base for 2016/17/18 of 2.5%/2.4%/2.4% (page 20, paragraph 3.17, Employment Land Needs Assessment, March 2016) is significantly excessive compared to the current OBR actual of 1.8% for 2016 (28% less) and forecast for 2017 of 2%(16% less) and 2018 of 1.6% (33% less) (http://budgetresponsibility.org.uk/forecasts-in-depth/the-economy-forecast/real-gdp-growth/#medium).

The OBR Forecast will be updated 31st October 2017 within the 017 Blue Book. Available now is the OECD forecast of 2017, giving a UK GDP forecast of 1.6% for 2017 and 1% in 2018 (‘DEVELOPMENTS IN INDIVIDUAL OECD AND SELECTED NON-MEMBER ECONOMIES’, Page 257, OECD, http://www.oecd.org/eco/outlook/economic-forecast-summary-united-kingdom-oecd-economic-outlook-june-2017.pdf). This is a 33% reduction in growth for 2017 and a 41% reduction in growth compared to the figures used by SCDC.

Page 123, Appendix 3 of “Ipswich and Waveney Economic Areas Employment Land Needs Assessment Final Report”, March 2016, states that:

“In this way, the model provides a vital means to address the following requirements of the NPPF: “Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.” NPPF, para. 158

Historical data over a 20 year-period is used for most variables to estimate the relationships between variables and for forecasting future trends. The interactions between economic (in terms of Gross Value Added) and labour market data (e.g. employees and self-employed) are fundamental mechanisms to then forecast local economic conditions.

Regional Gross Value Added (GVA) data is scaled to match the national accounts, as published in the “Blue Book”. The national accounts record and describe economic activity for different areas of the economy (e.g. production, income and financial transactions). The scaling to the national accounts is important because this mechanism provides the supply chain linkages between each economic sector: inputs from one sector have outputs in another.”

SCDC and their consultants have expressed the importance placed by the NPPF on a strong linkage to ‘relevant market and economic signals’, and further have used the Blue Book from 2015. Subsequent to this, the Blue Book has been reissued twice, with more up to date information as described above.
To summarise the above, SCDC in the Issues and Options document use a GDP forecast, which already two years out of date, to derive jobs, employment land needs and housing which is dramatically out of date and an over statement of both 2016 actuals and future forecasts. According to last year’s OBR forecast (to be updated again 31st October) the SCDC GDP estimate is 28% excessive for 2016, 16% excessive for 2017 and 33% excessive for 2018. According to the June 2017 OECD forecast the SCDC GDP estimate is 33% excessive for 2017 and 41% excessive for 2018. It is essential that SCDC updates the evidence base and the analysis of jobs, employment land and housing needs prior to the planned 2019 approval of its revised Local Plan.

Contradictions in jobs growth.

Figure 7.4 below (from P72, Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment Part 1, May 2017, Peter Brett Associates) shows a jobs growth estimate from two different sources, EEFM and Experian. The author draws comfort in that “It is clear that while there is some difference in views about the distribution of growth across the HMA, total forecast job growth is broadly similar in both models.” However, the two estimates are completely different sector by sector, and it would be equally valid to take the lowest and highest by sector to create widely differing totals. For example, for Suffolk Coastal, the EEFM estimate of growth in transport and storage is apparently about one sixth that of Experian.

Transport, logistics, distribution and warehousing jobs employment

Page 52 of the Issues and Options document states that “It is well placed to maximise its economic growth through a number of opportunities related to key locations and key sectors such as transport and logistics”. However, it does not state how the economic growth will be realised.

There will be relatively few jobs as a result, due to the current low employment rate per land area (see Table 7.7 below from P102 of “Ipswich and Waveney Economic Areas Employment Land Needs Assessment Final Report”, March 2016) of this commercial sector and the very high likelihood of further automation and remote working.
Further, this table dates from 2010. By 2031 there will be a considerable amount of automation, especially in warehousing distribution.

The Port of Felixstowe is introducing remote working of cranes with resulting employment efficiencies. Across the world ports and distribution are expected to introduce automation and remote working more and more, with new employment sites being the first to introduce these. “Shanghai, the world’s busiest container port, is almost entirely manual, while Rotterdam’s Maasvlakte II terminal, which opened in April 2015, has no personnel inside its cargo-handling section, thereby boosting efficiency and reducing the risk of accidents. Automation is easiest to implement at greenfield sites such as this, but can be partially or fully retrofitted at existing terminals.” (‘A turning point: The potential role of ICT innovations in ports and logistics’, November 2016, A report for DP World, prepared by The Economist Intelligence Unit).

An analogy is the efficiencies from containerisation “Because containers were packed and sealed at the factory, losses to theft plummeted, which in turn drastically reduced insurance costs. More could also be loaded: in 1965 dock labour could move only 1.7 tonnes per hour onto a cargo ship; five years later they could load 30 tonnes in an hour.” (https://www.economist.com/blogs/economist-explains/2013/05/economist-explains-14). The employment efficiency was improved by over an order of magnitude, the same could reasonably be expected for automation. Further, remote working means that the employment need not be collocated with the distribution. Therefore, the phrase ‘employment land’ becomes redundant for such industries.

It should be noted that of the evidence base; the Issues & Options document, the Housing Assessments, the Ipswich Economic Area Sector Needs Assessment or the Employment Land Assessment, there is only one mention of automation, and this is solely referring to manufacturing (para. 12.14 of the Ipswich Economic Area Sector Needs Assessment). However, it is recognised in industry, by the government and by business that automation will have very significant effects in the coming decades, and has already begun. Price Waterhouse Cooper list the sectors that will be most affected by automation in its March 2017 report; Transport & Storage is the sector forecast to be most affected, losing 56% of jobs by the early 2030s (Will robots steal our jobs? The potential impact of automation on the UK and other major economies, Page 35, https://www.pwc.co.uk/economic-services/ukeo/pwcukeo-section-4-automation-march-2017-v2.pdf). Without taking automation
account, the forecasts of employment rise in the sector, within the SCDC Evidence Base) is clearly wrong; a properly researched forecast would show significant job losses.

**Warehousing Requirements**

The latest EEFM 2016 forecasts (*East of England Forecasting Model: Land Use Module - 2016 baseline results*, http://atlas.cambridgeshire.gov.uk/EEFM/Employment_land_use_forecasts_baseline_EEFM_2016.zip) includes the historic data and forecast of floorspace for Warehousing, see below. As can be seen, the requirement for floorspace for warehousing in Suffolk Coastal is forecast to steadily reduce between 2014 and 2036.

![Suffolk Coastal Warehouse floorspace area estimates, 000sqm. By sector and total. Chart derived from table data Warehousing, EEFM 2016](chart.png)
5. **Response to questions asked in ‘Issues and Options for the Suffolk Coastal Local Plan Review V2, August 2017’**.

**Q1:** Are there any other issues that the Local Plan should consider?

Under both ‘Environmental Issues’ and ‘Social Issues’ should additionally be the need to provide an attractive environment to live in (this should be in the list since it is a Suffolk Coastal Vision), as well as providing choices of living environment – for example; urban, semi-rural with many facilities and rural with few facilities.

**Q2:** What are the advantages of your area that should be protected through local plans?

An attractive living environment with a mix of types of environment; urban, semi-rural with many facilities and rural with few facilities.

**Q3:** What are the disadvantages of your area that the local plans could try to address through the way land is used or developed?

There is too great a dependency on transport and support industries relying on the success of a single enterprise; the Port of Felixstowe. Further, jobs relating to the port are on average low in wages and very low in terms of jobs per unit of land. Diverse industries should be encouraged, which are not dependent on the Port of Felixstowe’s success, in order that there is resilience to the local economy.

**Q4:** What are the key priorities you would like to be addressed by 2036 - in the places across Ipswich and Suffolk Coastal where you live, work or study?

Improvement in the quantity and quality of educational places. School places have not kept pace with housing, whilst many look outside of the area for quality education.

Improvement in transport. The rail connections are unreliable and often closed at weekends. The Felixstowe peninsula is totally dependent on the A14 and the Orwell Bridge. When this is closed there are no effective alternatives; the low throughput options, such as through Ipswich, become immediately jammed up. The planned central Ipswich ‘Upper Orwell Crossing’ cannot mitigate this, because traffic would need to reach and then exit the centre of Ipswich to take advantage. Other initiatives to mitigate the Orwell Bridge and A14 issues are to encourage green transport; specifically cycling and walking. However, these are irrelevant when the main issue is the transport of containers from the country’s main port and other commercial traffic.

**Q5:** What is your vision for the Ipswich HMA and Ipswich FEA by 2036?

Suffolk Coastal (East Suffolk) state that its Vision is to “Maintain and sustainably improve the quality of life for everyone growing up, living in, working in and visiting East Suffolk.” It then states that the vision will be achieved by adopting a three-pronged strategy; Enabling Communities, Economic Growth and Financial Self Sufficiency. However, these three prongs cannot achieve the vision of maintaining and sustainably improve the quality of life unless another prong is added, which is to maintain and sustainably improve the living environment. Babergh, Mid-Suffolk and Ipswich state in this document this priority – so should Suffolk Coastal.
Q6: Which growth scenario should we plan for across the Ipswich Housing Market Area?

The scenarios appear to be based on a reducing existing population, but a significant net increase due to migration inwards due to new jobs. Given the reducing forecasts of GDP and the forecasts of job reductions due to automation such as the one quoted in the response to Q7 below, it would appear that the analysis by SCDC and their consultants have potentially overestimated the number of new jobs, and therefore the number of houses required in all these scenarios.

Q7: Do you have evidence to suggest that the housing and/or jobs targets should be different from the forecasts or scenarios outlined above - either higher or lower?

The estimates for job growth appear to be optimistic, given the published forecasts for the effects of automation and remote working, none of which are referred to in the consultation. If Price Waterhouse Cooper list the sectors that will be most affected by automation in its March 2017 report; Transport & Storage is the sector forecast to be most affected, losing 56% of jobs by the early 2030s (Will robots steal our jobs? The potential impact of automation on the UK and other major economies, Page 35, https://www.pwc.co.uk/economic-services/uken/pwcukeo-section-4-automation-march-2017-v2.pdf).

Q8: Would communities be prepared to accept more growth if that growth meant that significant new or enhanced infrastructure could be provided?

In the case of Kirton and Falkenham the general view was that the community would not accept significant growth as the price for new or enhanced infrastructure local to the community.

Q9: What key pieces of transport infrastructure should be sought? Would it be roads such as an Ipswich northern route, or sustainable transport infrastructure (public transport, park and ride, cycling), or both?

There should be a single priority; an alternative to the on the A14 from Felixstowe to the Capel junction (A12 South). This would reduce traffic on other roads and so make cycling, walking and buses more attractive and significantly reduce the logjam when the A14 is closed.

Q10: Should the Local Plan Review seek to address the issue of temporary closure of the Orwell Bridge by planning for a scale of development that can help to deliver infrastructure?

The issue is wider than the Orwell Bridge; it is the dependency on the A14 from Felixstowe to the Capel junction (A12 South). The current traffic is beyond the capacity of the Orwell Bridge at peak times, and the traffic queues at the A12 junctions and Nacton junctions have significantly increased in the last few years; this should be used to justify new diverse routing without the need for massive development.
Q11: Do you agree that providing a high growth scenario would help to deliver the affordable housing required?

No. High growth would mean house prices would increase, not become more affordable. Cambridge is a good local example where this has happened.

Q12: Are there alternative scenarios which should be considered?

Yes. Schools should be built as a priority to meet current demand. Transport should be improved to meet current demand. Smaller, lower cost housing should be specified to meet the needs of the elderly and fragmented families; rather than the current situation where most of homes built are four bedrooms detached.

Q13: Which distribution options do you think would be most appropriate to take forward?

Two principles should be adopted, which are complementary. Large numbers of new houses should be built where there is walking access to public transport, health services, leisure facilities and shops. Note that although many rural villages have bus services, they are so infrequent as to be useless for employment, commuting and most leisure activities. Small rural communities with few facilities should remain small. These two principles give a choice of living environment to residents of the district. Option 5 (page 30) would appear to most closely match these principles.

Q14: Are there any other distribution options that the Councils should consider, including across the whole of the Ipswich Housing Market Area?

A focus purely upon towns; a mixture of Options 4 and 5.

Q15: Should the spatial distribution of jobs growth align with housing growth or should we take a different approach which focuses on improving accessibility between homes and work places?

The reality is that housing should align with jobs.

Q16: Do you have evidence which indicates that building at higher densities in Ipswich and Suffolk Coastal would be viable financially?

N/C

Q17: Should the policy approach of maintaining the physical separation of villages from Ipswich be continued or should infill in gaps between settlements be considered a source of housing land?

Continue. It is essential for health and quality of life that separation and differentiation is maintained.
Q18: If development cannot be accommodated within Ipswich, should it be focused within the communities close to Ipswich or distributed within the larger Ipswich Housing Market Area? What criteria should guide its location?

Large numbers of new houses should be built where there is walking access to public transport, health services, leisure facilities and shops. Note that although many rural villages have bus services, they are so infrequent as to be useless for employment, commuting and most leisure activities.

Q19: Should Ipswich switch employment land to housing use, even though the Borough has a high jobs target? Where should the Council prioritise protecting employment land?

N/C

Q20: Is there other land within Ipswich Borough which should be considered for residential development? Is the approach to protecting open space the right one?

N/C

Q21: Where do you think the most appropriate locations are to meet this need?

N/C

Q22: Which town centres should we plan to expand?

Leiston should be given the opportunity for improvement.

Q23: Are there town centres that should be reduced in size?

N/C

Q24: Which sites should be identified through the Local Plan reviews for future retail growth?

Derelict sites in Ipswich; old law courts, police station, abandoned shops.

Q25: How do we increase the range of uses or activities in Ipswich town centre, given its role as a regional centre, and what should they be?

Reduce parking charges. On a Sunday, Ipswich still charges for parking spaces for leisure and shopping – usually they are left unused. In contrast, the West End of London makes much off street parking free – what is it the centre of Ipswich has that Regent street etc. does not?

Q26: What range of uses or activities would you like to see in the smaller town centres?

N/C
Q27: What approach should be taken to further out of centre shopping? Does out of centre shopping complement or compete with the existing town centres?

Competes. Until Ipswich loses its fixation with the waterfront and allows the west of the centre to be developed for retail, then out of town is the only solution.

Q28: Should the existing retail parks be considered as centres in their own right, or should town centres continue to be the first choice location for new shops and leisure uses?

Depends on the type. DIY centres, garages etc. clearly best out of town for access and close parking.

Q29: What infrastructure is currently required in your area and what additional infrastructure do you think would be needed, and where, to support the future distribution and levels of growth outlined?

The upper Orwell crossing should be cancelled. Any solution to taking traffic off the Orwell Bridge, especially during closure and congestion, must avoid town centre access. Alternatives such as the northern bypass should be progressed.

Q30: How can the strategic transport connections be enhanced and improved?

The upper Orwell crossing should be cancelled. Any solution to taking traffic off the Orwell Bridge, especially during closure and congestion, must avoid town centre access. Alternatives such as the northern bypass should be progressed.

Q31: In which areas should "super surgeries" be considered?

Only in urban areas of high housing concentration.

Q32: Is there a need for additional education provision in certain areas of the Housing Market Area, including early years and special educational facilities, and if so what is the need and where?

There is a shortage of places at Trimley St. Martin School; school places have not been increased to match the increase in housing.

Q33: What kind of outdoor recreational spaces would you like and where should we locate them to reduce pressure on the more sensitive coastal areas? What other measures could be put in place to protect sensitive environments?

The Open Space and coastal footpath initiatives should be progressed further to make access to existing outdoor spaces easier.
Q34: What makes a successful community in Suffolk Coastal?
SCDC should maintain a variety of communities (i.e. rural, semi-rural, urban, small and large) in order to give people choice of the environment in which they live.

Q35: What services / facilities / developments are needed to make a community successful?
Different depending on whether rural, semi-rural, urban, small and large.

Q36: What is your vision for your local community?
No significant further housing or major industrial development. Improvements in schooling in the area and sufficient NHS services. Improved public transport. Proper maintenance of the roads; some of the roads have been let to deteriorate such that a single car touches hedges on both sides.

Q37: How should the Council define housing requirement figures for Neighbourhood Plan groups?
N/C

Q38: Are the existing policy approaches and planning policies operating appropriately in relation to affordable housing?
Planning policy in many villages, including Kirton & Falkenham, should require that any development is of small houses suitable for the young, elderly and fractured families. There is a chronic shortage of affordable social housing for renting across the district. This means that the less well off are paying high rent to private landlords, resulting in the payment of high levels of housing benefit and council tax reduction. There are enough four bedroom detached houses.

Q39: Is the existing affordable housing policy coverage and scope sufficient? Do you have any suggestions for what else might be included in a comprehensive approach to affordable housing?
Planning policy in many villages, including Kirton & Falkenham, should require that any development is of small houses suitable for the young, elderly and fractured families. There is a chronic shortage of affordable social housing for renting across the district. This means that the less well off are paying high rent to private landlords, resulting in the payment of high levels of housing benefit and council tax reduction. There are enough four bedroom detached houses.

Q40: Where provision for affordable housing on an 'exception site' is supported by, and can be shown to meet the needs of, that local community should planning policy be sufficiently flexible to allow for this?
Planning policy in many villages, including Kirton & Falkenham, should require that any development is of small houses suitable for the young, elderly and fractured families. There are enough four bedroom detached houses.
Q41: Should we continue to allow market housing to enable the delivery of affordable housing where the financial viability of a development is challenging?

Planning policy in many villages, including Kirton & Falkenham, should require that any development is of small houses suitable for the young, elderly and fractured families. There are enough four bedroom detached houses.

Q42: Do you consider it appropriate for the Council to consider directing growth to a cluster of villages.

No, this would inevitably lead to housing and industrial growth linking villages to create mini conurbations. The heritage and character of villages should be maintained, and people given a choice of types of communities in which to live. If small villages are forced to have growth because larger villages are nearby, then there will be no small villages to live in.

Q43: What criteria should be used to identify a cluster of villages.

There should be no such concept in planning. If small villages are forced to have growth because larger villages are nearby, then there will be no small villages to live in.

Q44: How can the Council encourage the provision of fully serviced building plots for self build / custom build properties

N/C

Q45: Should these serviced plots be provided as part of a larger housing development?

N/C

Q46: Should we continue with the current policy approach to housing size or take a more flexible approach that reflects the site location and characteristics?

Planning policy in many villages, including Kirton & Falkenham, should require that any development is of small houses suitable for the young, elderly and fractured families. There is a chronic shortage of affordable social housing for renting across the district. This means that the less well off are paying high rent to private landlords, resulting in the payment of high levels of housing benefit and council tax reduction. There are enough four bedroom detached houses.

Q47: How can the Local Plan promote an increase in smaller units to meet specific needs?

By planning policy.
Q48: What more could be done to help ensure that more housing is provided specifically to meet the needs of older people, or those with specialist care needs?

By planning policy.

Q49: Should starter homes be part of the type and mix of units required

Yes.

Q50: Should the Council encourage greater use of modular construction to provide a range of residential accommodation?

If they fit within an evolving landscape for the villages.

Q51: Should specialist housing be delivered on specific sites or alongside other forms of residential development?

Alongside; to provide a social mix.

Q52: Are there any other specific types of residential use that need to be planned for?

N/C

Q53: The district contains a small number of houseboats. Existing planning policies limit the areas within which houseboats are permitted and the number of houseboats within those areas. Do you think this type of approach remains appropriate?

N/C

Q54: Should the physical limits boundaries be tightly defined around existing built development or more loosely defined to allow for small scale development in communities?

These should be retained to protect communities, any application outside the physical boundary should be treated on an individual exception basis.

Q55: Can criteria based policies more appropriately deal with growth in the rural areas than physical limits boundaries?

Physical limits boundaries should be retained to protect communities, any application outside the physical boundary should be treated on an individual exception basis.
Q56: Do all settlements require physical limits boundaries?
Yes, unless rural scattered communities.

Q57: Do you think the current policy approach to development in housing clusters is working successfully or does it need to be amended?
Any development outside of a physical boundary should be treated on an individual exception basis.

Q58: How should the Council consider applications for the re-use of redundant buildings in the countryside?
On an individual basis.

Q59: Should the Council introduce a sequential approach to the re-use of redundant buildings with priority given to, for example employment or tourism use?
This should be considered on an individual basis, taking into account the neighbourhood characteristics.

Q60: Should we continue to identify both strategic and general employment areas?
A diversity of businesses and employment is required, so this differentiation should be removed.

Q61: Should we continue to stipulate the uses on sites allocated for employment or should policies be more flexible to allow a wider variety of uses?
This should be decided on an individual basis, taking into account the neighbourhood characteristics.

Q62: Should planning policies take a flexible approach to new employment development where there is an identified need by allowing development outside of allocated sites and physical limits boundaries?
No, this would create uncontrolled placing of industry. Employment development should be inside allocated sites and physical limits boundaries; which should be reassessed when needed.

Q63: Should the Local Plan allocate more land than is required for employment uses or should we only allocate what is needed?
Only allocate what the evidence states is needed. To allocate more land than is required would create planning blight, amount to land banking and provide an incentive not to progress development on brownfield sites and other sites where planning permission has already been granted. We have seen this occurring already; planning permission granted several years ago for the Port Logistics Facility within the port and for a massive warehouse by Uniserve outside the port have not progressed. The desire of landowners to obtain planning permission to potentially increase the
value of their assets is not matched by enthusiasm of investors to supply the capital to deliver these desires.

If we take example of warehousing, the latest (2016) EEFM shows the industry requirement of floorspace for warehousing steadily declining in in Suffolk Coastal between 2014 and 2036. Given the lack of progress on the already approved planning permissions for additional warehousing space, any further approvals of change of designation are shown to be unnecessary by SCDC’s own data. As such it is quite possible that any further major designation of land for such uses would be considered unjustifiable and reckless, and potentially expose the Council to actions or legal claims for damages for surrounding residencies affected by planning blight.

Q64: What land is required to support the main economic sectors across the district?

The data within EEFM (2016), used in the evidence base, has the floor space requirement for Warehousing declining between 2014 and 2036. Therefore, no more land is required, especially since there are currently unimplemented planning permissions for warehousing. The EEFM data gives an explanation as to why these planning permissions have not yet been able to attract development investment.
The evidence base includes this table:

<table>
<thead>
<tr>
<th>B Use Class</th>
<th>Job Density (Sq.m per job)</th>
</tr>
</thead>
<tbody>
<tr>
<td>B1a – General Office</td>
<td>12.5</td>
</tr>
<tr>
<td>B1a – Serviced Business Centre and Business park</td>
<td>10.5</td>
</tr>
<tr>
<td>B1a – Call centres</td>
<td>8</td>
</tr>
<tr>
<td>B1b – Science Park and Small Business Units</td>
<td>32</td>
</tr>
<tr>
<td>B1b – High tech R&amp;D</td>
<td>25</td>
</tr>
<tr>
<td>B1c / B2 – Industry</td>
<td>43</td>
</tr>
<tr>
<td>B8 – Distribution (General, Smaller Scale)</td>
<td>65</td>
</tr>
<tr>
<td>B8 – Distribution (Larger Scale, Lower Density)</td>
<td>74</td>
</tr>
</tbody>
</table>

Source: HCA/OffPAT Employment Densities Guide 2010 / NLP analysis

It shows that Distribution (including warehousing and transport) provides a very poor return of employment per square metre. Further, this table dates from 2010. By 2031 there will be a considerable amount of automation, especially in warehousing distribution.

The Port of Felixstowe is introducing remote working of cranes. Across the work ports and distribution are expected to introduce automation and remote working more and more, with new employment sites being the first to introduce these. “Shanghai, the world’s busiest container port, is almost entirely manual, while Rotterdam’s Maasvlakte II terminal, which opened in April 2015, has no personnel inside its cargo-handling section, thereby boosting efficiency and reducing the risk of accidents. Automation is easiest to implement at greenfield sites such as this, but can be partially or fully retrofitted at existing terminals.” (‘A turning point: The potential role of ICT innovations in ports and logistics’, November 2016, A report for DP World, prepared by The Economist Intelligence Unit).

A reasonable analogy is the efficiencies from containerisation. An article from the Economist states that “Because containers were packed and sealed at the factory, losses to theft plummeted, which in turn drastically reduced insurance costs. More could also be loaded: in 1965 dock labour could move only 1.7 tonnes per hour onto a cargo ship; five years later they could load 30 tonnes in an hour.” (https://www.economist.com/blogs/economist-explains/2013/05/economist-explains-14). The employment efficiency was improved by over an order of magnitude, the same could reasonably be expected for automation. Further, remote working means that the employment need not be collocated with the distribution. Therefore, the phrase ‘employment land’ becomes redundant for such industries.

Q65: In which locations or specific economic sectors would a co-locating policy be appropriate?

Whilst an argument has been made for some port centric warehousing and distribution, as opposed to population centric (which would be well inland) by 2031 such warehousing will be largely automatic and run by remote working. Placing such land intensive facilities in area of sensitive landscape and where the impact on rural populations will be high, makes no sense when the employment and economic benefits to the area are likely to be minimal.
Q66: Should the Council continue to identify rural employment sites?
Yes.

Q67: What criteria should be used to define a rural employment site?
Employment opportunities and of a nature suitable for the neighbourhood.

Q68: Are the existing boundaries of town centres, primary shopping areas, primary shopping frontages and secondary shopping frontages still appropriate?
They should be reviewed.

Q69: What areas or locations should be considered for inclusion or exclusion from these boundaries?
N/C

Q70: Should the Council introduce a local impact assessment threshold to help demonstrate no impact on existing town centres in an objective way?
Yes.

Q71: Should the Local Plan continue to protect retail provision within district and local centres?
Yes

Q72: What uses are appropriate within district and local centres?
N/C

Q73: What areas or locations should be considered for inclusion or exclusion from a district or local centre?
N/C

Q74: Are there particular opportunities in relation to commercial leisure across the district?
Yes, these much not be damaged, or the land sterilised, by allocating land to function of low, and in the future minimal, employment value.
Q75: Do the existing Local Plan and Neighbourhood Plan policy boundaries assist opportunities for accessible new leisure provision?
N/C

Q76: What is a successful mix of retail and commercial leisure uses across the district?
Further integration needed to create vibrant centres where people wish to spend time.

Q77: Where is the best place for new retail development to meet the needs of areas east of Ipswich?
Felixstowe.

Q78: Does out of town retail at Martlesham affect your town centre or local area? If so how?
Yes, by competing with town centre but not providing reasons to spend time in a holistic leisure area.

Q79: Are the existing policy approaches and planning policies operating appropriately in relation to retail?
N/C

Q80: Is the existing town centre and leisure policy coverage and scope sufficient? Do you have any suggestions for what else might be included in a more comprehensive approach?
N/C

Q81: What specific types of tourism accommodation are required across the district and in which locations?
N/C

Q82: Should tourist accommodation be encouraged across the whole district or just in specific areas?
N/C

Q83: Do we need to protect existing tourist accommodation from conversion and redevelopment to other uses?
N/C
Kirton & Falkenham Parish Council response to the SCDC Local Plan Issues and Options document public consultation August/October 2017

Q84: What is the most effective way of ensuring that tourism accommodation is not occupied for full time residential use?
N/C

Q85: How can planning policy better facilitate the development of tourism attractions to support the resort of Felixstowe?

Massively increasing port related functions and commercial traffic on the peninsula will dramatically reduce the effectiveness of Felixstowe as a tourism destination.

Q86: What type of resort activities will help extend the tourism season and increase visitor spend.
N/C

Q87: Do we need a different approach to tourism development in the AONB as opposed to areas outside the AONB?
N/C

Q88: Are the current SCC parking standards appropriate in the context of Suffolk Coastal? If not, what changes would you wish to see and why?

Issues of parking and short term waiting at schools needs to be urgently addressed.
The introduction of parking charges reduces rather than encourages the growth of visitors for tourism. Charges for smaller towns within the district encourage the use of shopping centres with free parking. Businesses in the smaller towns are further penalised by the imposition of unreasonable rateable values.

Q89: Is the need for and the importance of, vehicle parking sufficiently reflected in existing planning policies?
Issues of parking and short term waiting at schools needs to be urgently addressed.

Q90: Should we continue to protect all existing community services and facilities?
Shops, village halls, leisure facilities, health centres, education and public transport are all required.

Q91: Should some types of services and facilities be given more protection than others?
Shops, village halls, leisure facilities, health centres, education and public transport are all required.
Q92: Where it is not possible to retain the existing community use should we require an alternative community use to be investigated prior to allowing redevelopment?
Yes

Q93: Which areas lack appropriate provision of community facilities?
Kirton and Falkenham lack shops, leisure facilities, education choice and public transport.

Q94: Should the Council continue to use CIL or section 106 agreements or a mixture of both?
Any income from this should be spent in consultation with the local community.

Q95: Should specific sites be allocated for community facilities?
Any income from this should be spent in consultation with the local community.

Q96: Should future Local Plan policies provide greater protection for facilities identified as assets of community value?
Yes.

Q97: How can the Local Plan assist the enhancing and re-development of modern leisure centres and sports hubs facilities across the district?
N/C

Q98: What policies are needed to ensure that appropriate leisure provision is provided across the district?
N/C

Q99: Is the provision of a new modern leisure facility for Felixstowe, enabled through the redevelopment of the existing facilities for other uses, better than seeking to refurbish the existing ageing leisure facilities?
N/C

Q100: Should we continue with the existing standards, or should the provision of new open space and play space be guided by the deficiencies identified in the Leisure Strategy?
The definition of Open Space should include visual amenity to which the public does not necessarily have access, as is the case in other regions of the UK.
Q101: What type of facilities/provision should be considered as Open Space?
The definition of Open Space should include visual amenity to which the public does not necessarily have access, as is the case in other regions of the UK.

Q102: Under what circumstances may it be acceptable to allow the loss of open space to development?
Only when like for like replacement is possible. For example; a heritage landscape cannot be replaced by a new park. Instead the heritage landscape should be saved and the area where the park is to be built should be used for housing.

Q102: Under what circumstances may it be acceptable to allow the loss of open space to development?
Never in the case of heritage landscape, SLA, AONB etc.

Q103: What type or size of development should provide new on-site Open Space?
N/C

Q104: Which areas of the district experience deficiencies in health facilities?
Surely is something that SCDC and SCC should state and then ask for view on.

Q105: How can the Local Plan Review further promote the provision of high speed broadband and communication networks across the district?
N/C

Q106: How can the Local Plan Review create safe and accessible communities which do not undermine the quality of life across the district?
N/C

Q107: Should we continue with the CCMA existing policy approach?
It should be in line with the SMP.

Q108: What types of development should be considered appropriate within a CCMA?
Perhaps a clear planning condition should be made that development is at the developer’s and subsequent owners’ risk and that there is no obligation by authorities to protect such developments.
Q109: Should the CCMA boundaries also be redrawn to reflect the topography and infrastructure?

If you read the SMP documents, especially the maps, you will find that the topography (such as elevations of land, and estuary and river routes) and manmade and natural infrastructure are included as they are fundamental to the area of flood risk. If some version of the CCMA does not reflect this information (which was approved seven years ago) then clearly it should.

Q110: If required, should the Council proactively allocate land for the relocation of property at risk from erosion.

This should be considered on a case by case basis. If a person purchases a home at a reduced price due to its flooding risk, should the Council effectively indemnify them against flooding?

Q111: Could houseboats, floating homes or caravans be used as an alternative or temporary means of re-housing those affected by coastal erosion?

A presentation a few years ago by SCDC stated that over 100 years, very few homes were at high risk from coastal erosion. Potentially tragic for those individuals, but this question implies that there is a massive requirement. Worse, the question puts forward solutions that are very inappropriate for the level of risk within Suffolk Coastal and this undermines this consultation and the important issue of coastal erosion. SCDC should put a risk analysis together for replacement of houses by floating homes and what the design would be, before asking for comment.

Q112: How can the council attract buy-in from coastal business owners to contribute to the costs of coastal protection?

By taxing them to maintain flood defences.

Q113: Should the CCMA be defined in an area where the SMP policy is to ‘hold the line’, subject to evidence of how coastal protection can be funded in this area?

This question is not clear, perhaps some clarification would help. Is this asking whether there should be an implementation and funding plan for area where the policy is to ‘hold this line’? IF so then clearly yes.

Q114: What wider sustainability benefits to the community could justify development taking place in an area of flood risk?

None. Why build on flood risk areas when there are plenty of non-flood risk area available? Flood risk areas could form the basis of new accessible Open Space.

Q115: Are there any particular uses that land at risk of flooding could be used for?

Agriculture and Open Space. Why take flood risk agricultural land out of food production and build instead ‘at risk’ homes?
Q116: Should the Local Plan Review identify sites for renewable energy development across the district? Which areas across the district would be appropriate and for which types of technology?
Yes. The sea is suitable for wind farms. Limited use of agricultural land for solar panels.

Q117: How can the Local Plan Review encourage new residential developments to reduce carbon emissions?
By placing large scale housing development within walking access to existing retail and leisure centres, and not in rural villages.

Q118: Should the Local Plan Review require other kinds of development like employment, retail, leisure and tourism to meet higher standards of energy efficiency?
N/C

Q119: How can we improve the design and quality of estate scale development?
By placing large scale housing development within walking access to existing retail and leisure centres, and not in rural villages.

Q120: How can we improve design quality through planning policy?
By having a clear heritage design guideline.

Q122: Is it possible to secure high quality design which is locally distinctive through factory build development?
N/C

Q123: Should large scale developments be required to follow the "Garden City" principles?
Difficult to equate a housing estate with a Garden City.

Q123: Should large scale developments be required to follow the "Garden City" principles?
It is worthy of strong consideration.

Q125: Should local housing densities be set for new developments?
Yes, and they already are by SCDC. During the development of the existing Local Plan, it was very disappointing to find that the planning policy team were using a guideline for housing density of sites that had a hugely lower density than the planning control team required of the developers.
Kirton & Falkenham Parish Council response to the SCDC Local Plan Issues and Options document
public consultation August/October 2017

Q126: Should different design principles be applied to housing developments at high/low densities? For example, avoid using detached housing at higher densities in order to maintain sufficient space between buildings?

Yes, in order to provide choice by purchasers and diversity of build landscape.

Q127: When would development of residential back gardens be inappropriate?

Only on a large scale redesign. It is disappointing that cramming of one or two houses into back gardens has been allowed by the government planning inspectors on appeal.

Q128: Should the Council adopt additional optional standards in respect of accessibility, internal space and water efficiency?

Only if the Building Regulation are proven inadequate, in which case SCDC should take this up with the government department. SCDC probably do not have the resources, and it might be an inefficient use of taxes, for SCDC to go its own way.

Q129: What should be included in a positive strategy for the protection of heritage assets across the district?

The landscape, the standing heritage and buried archaeology are all part of the heritage landscape. The landscape invariably is a major factor in the location of ancient dwelling and industrial sites and this is the characteristic of the regional heritage. UNESCO use this for guidelines for heritage sites; the sites and the landscapes in which they dwell are protected. If Suffolk Coastal is to retain what is left of its landscape character, similar guidelines should be included in planning.

Q130: What does the Council need to include in a positive strategy for the protection and enhancement of heritage assets?

There are over 140 questions raised in the document. Did Q 130 and Q 129 really need to be separate questions?

Q131: What level of protection should be given to non-designated heritage assets and locally listed buildings?

Firstly, heritage assets are not only building but archaeological sites and landscapes. For example, Sutton Hoo is not a building. Heritage assets should be protected from development.

Q132: Is a Landscape Character approach to considering the impact of development on the landscape preferable to retaining Special Landscape Areas for this purpose?

In general, a Special Landscape Area is a particular case of areas designated of Landscape Character. The landscape, the standing heritage and buried archaeology are all part of the heritage landscape. The landscape invariably is a major factor in the location of ancient dwelling and industrial sites and this is the characteristic of the regional heritage. UNESCO use this for guidelines for heritage sites;
the sites and the landscapes in which they dwell are protected. Further UNESCO recognises landscapes to be preserved of purely a purely natural characteristic. If Suffolk Coastal is to retain what is left of its landscape character, similar guidelines should be included in planning for both heritage and natural landscape.

Q133: Other than those protected as part of the AONB and Heritage Coast, which other sensitive landscapes require special protection?

Those landscapes which provide a balance to modern high density living, to maintain public health and quality of living. Further, inland landscapes need to be assessed; there is a risk that Suffolk Coastal will consider just the immediate coastal and hinterland area.

Q134: Should areas of tranquillity be identified and protected and if so, which areas should be considered?

As development continues it gets harder to find tranquil areas. It is even more vital that they are identified and protected, which of course means that development within sound and sight distance should not be permitted. A sound and sight buffer need to be specifically identified around the tranquil areas.

Q135: In which areas should development be resisted to avoid settlement coalescence?

Felixstowe and Ipswich are the largest two towns and have very different characteristics. To retain the ability to grow, developing further these characteristics for example tourism vs large scale office employment, they must be kept physically separate. In particular, ribbon development along the A14 must be prevented. It is imperative that our District and County Councils take a strategic view, rather than simply responding to applications for development of green fields by owners of land between Felixstowe and Ipswich. The proposed development at Innocence Farm (site 706) would be a major contribution to industrial ribbon development along the A14 and would urbanise nearly a third of the remaining green field separation between Felixstowe and Ipswich. It would create a precedent for further development which would result in an Ipswich/Felixstowe conurbation, removing the distinction between the two towns.

Q136: Which areas require special protection from development?

In particular, ribbon development along the A14 must be prevented. It is imperative that our District and County Councils take a strategic view, rather than simply responding to applications for development of green fields by owners of land between Felixstowe and Ipswich. The proposed development at Innocence Farm (site 706) would be a major contribution to industrial ribbon development along the A14 and would urbanise nearly a third of the remaining green field separation between Felixstowe and Ipswich. It would create a precedent for further development which would result in an Ipswich/Felixstowe conurbation, removing the distinction between the two towns.
Q137: Do breaks and gaps in-between buildings need to be given specific protection against development?

Yes. It may be tempting to consider ‘in fill’ as an easy planning option. However, these gaps create views onto landscapes, including AONB and SLA, which provide a balance to modern high density living, to maintain public health and quality of living.

Q138: Should development be promoted in areas which are deficient in Green Infrastructure provision with respect to biodiversity and geodiversity?

If an area is already deficient in provided Green Infrastructure provision with respect to biodiversity and geodiversity, why would SCDC promote development to make this worse? What would be the objective?

Q139: Should the Council explore further options to work collaboratively with neighbouring authorities and Natural England to determine a consistent policy approach to biodiversity and geodiversity?

Given that wildlife and, to an extent natural features, do not respect local government boundaries, then yes.

Q140: What level of protection should be given to locally designated sites of biodiversity value.

They should not be obliterated by development.

There are two Q140s in the document.

Q140: Should the Council consider a policy which requires the creation of new habitats and enhancement of wildlife corridors on new development sites?

This would only be a last resort. Far better to retain sites of wildlife and biodiversity than try to replicate them after they are destroyed.

Q141: Do you have any suggestions for Local Plan policies to support biodiversity retention and enhancement?

Far better to retain sites of wildlife and biodiversity.

Q142: Do you have any other comments on how current Local Plan policies are working and whether they need to be amended?

SCDC has recently stated that a government inspector has decreed the Local Plan out of date, because this consultation document was promised to be published in 2015, and overturned a planning decision by SCDC on this basis.
Q143: Which sites do you consider appropriate for future consideration by the Council?
Please see Kirton & Falkenham Parish Councils recommended changes to the “Initial Sustainability Appraisal Site Assessments August 2017”

Q144: Are there any other sites you are aware of which the Council should consider?
N/C