

## DRAFT

### Kirton & Falkenham Parish Council Response to SCLP12.55 (Land to the rear of 31-37 Bucklesham Road, Kirton) in the Final Draft Local Plan

11<sup>th</sup> February 2019.

**It is argued that SCLP12.55 is unsound as not justified given the benefits of reasonable alternatives.**

#### Summary

Kirton has exceeded its housing allocation within the current planning period to 2027 by approximately 700%. It has become a dormitory village with few services available and with sparse public transport, not adequate for commuting. There are much better locations in Large Villages nearby, or Felixstowe. There are significant access and flooding problems with the site. That SCDC have not properly addressed these is evidenced by the contradictory assessments in these categories in the Sustainability Appraisal and Strategic Housing and Economic Land Availability Assessment reports.

#### Background

The current Local Plan and Felixstowe Peninsula Area Action Plan allocated 7 houses for Kirton, to the end of the planning period in 2027. So far there have been at least 48 constructed. Kirton has already had considerably more housing constructed than was planned.

Kirton already has more affordable housing than any other village in the District. Kirton also has 30 estate houses to rent as well as other private rentals.

The recent housing growth in the village has not improved services nor is there any evidence that it has retained the few services that we do have. There is no school within the village and the closest primary school, which is a mile from the village centre, is currently subject to a proposal from the County Council to close the site and move it to a location on the other side of the A14, an additional mile in distance. There is no shop for basic foods, medical or other services. There is no public transport with sufficient timing to allow work commuting by public transport. The village consensus, derived from well attended village meetings, is that we should have no more growth in the short and medium term, and that we do not wish to continue to grow as a dormitory village from which private cars have to be used for commuting and access to services.

#### Reasonable Alternatives

Kirton is a village with almost no services and a bus service which it is not possible to use for regular commuting and use of leisure facilities, due to the infrequency and timing of the buses. Any further housing growth will further push Kirton into becoming a dormitory village, with access to shops, work and education only possible via private car. For the SCDC December 2018 'Sustainability Appraisal Report' to then award a green positive to the site '*To encourage efficient patterns of movement, promote sustainable travel of transport and ensure good access to service*' (page 600) is perverse. This is particularly the case when the SCDC December 2018 'Strategic Housing and Economic Land Availability Assessment' assesses both 'Transport & Roads' and 'Access to the Site' as amber (page 351).

The Parish Council believes that, considering the benefits of the reasonable alternative of building the twelve houses proposed in nearby Large Villages, with access to services and public transport, SCLP12.55 is unsound. Kirton has already provided a great excess of houses in the planning period to 2027.

The major industry sector in the area is Port related. This sector (largely B8)0 is already the lowest density of jobs, and industry forecasts are that this will dramatically reduce since the logistics sector is one of the first to be targeted by automation. Hence arguments of locally generated employment need do not stand.

Allocations for housing in this Local Plan exceed the total dwelling requirement for the period 2018 – 2036 by approximately 8.5% (approximately 890 dwellings), before an allowance for windfall is factored in (Local Plan, §3.39). Therefore the removal of this policy will have negligible impact, even if an alternative site is not found.

**Kirton should not be developed further unless local services and transport improve.**

### Flooding

The Local Plan states that *'Surface water flooding is recorded in the south east corner of the site. Any development in this area of the site will need to demonstrate mitigation measures designed to alleviate the potential surface water flooding risks. This is required to be undertaken in accordance with the surface water management hierarchy'* (§12.614).

However nearby residents report that that this issue is very significant and that the expectation that it can be managed so readily may well be incorrect. There are springs on the site. The selection of a site prone to flooding is illogical.

Residents report that the site is a flood plain. There is a drainage ditch alongside 37 Bucklesham Road and another ditch alongside 29 Bucklesham Road. This site has been previously turned down by SCDC due to the flood risk. No action has been taken on this, so it is not sound for SCDC to now propose this site.

For the SCDC December 2018 'Sustainability Appraisal Report' to then award a green positive/? to the site *'To reduce vulnerability to climatic events and flooding'* (page 599) is extraordinary.

Given that the SCDC December 2018 'Strategic Housing and Economic Land Availability Assessment' assess the flood risk as 'amber' (page 351) this makes the green/positive assessment by the Sustainability Appraisal Report even more extraordinary, as does the adoption of this site as a recommended policy.

The part of Kirton which SCDC proposes for housing has poor sewerage service with problems experienced by residents.