Matter 2: The Suffolk Coastal Spatial Strategy – G Bremner

A Housing Provision

Issue: Is the overall strategy and provision for housing development effective and justified?

Calculating the housing need

2.1a The evidence base for employment growth, resultant housing numbers and windfall calculations are unrobust and need revisiting to establish rigour and integrity. The housing levels are predicated on Port based employment growth which is not accurate and does not take into account the automation of Port systems and the reduction in manpower levels that will take place. The argument that housing levels are to provide for port centric employment bears no scrutiny and the justification that placing houses where jobs are located to reduce travel and carbon emissions is fundamentally flawed as the migratory traffic on and off the peninsula will increase by thousands of vehicles daily. This will increase carbon emissions and is in direct contradiction of the Governments own 25 Year environment plan.


2.1b The allocation of housing has been concentrated on a peninsula with a single bridge connecting to the mainland and with just one major road on and off that peninsula. It is unsound and housing allocations should be concentrated around Ipswich which provides a far greater spatial distribution for traffic and commuting into London and the Midlands and a more robust infrastructure framework. The duty of care to co-operate has not been exercised and the relationship between SCDC and one large landowner in Trinity College is unhelpful and has directly influenced unsustainable allocations on the Felixstowe peninsula.

2.1c The DLP states in paragraphs 2.15 and 2.16 that growth is not currently achievable which strengthens the requirement of paragraph 60 of the NPPF relating to the consideration of “exceptional circumstances justifying and alternative approach” This serves to support a review of the DLP in that context.

2.1d The IpswichNorthernroute infrastructure has been identified as being required to be in place before implementation of the current DLP and has issued warnings if that does not happen. To ignore those comments would be unsound in the circumstances.

www.ipswichnorthernroute.org.uk

C Distribution of Growth and the Settlement Hierarchy.

Issue: Whether the Plan sets out a clear strategy for the pattern of development consistent with national policy?

2.17 The strategy for growth as defined in SCLP3.1 is unjustified as it is based on employment figures that are not validated and based on un-robust data. Without employment growth, there is no need for housing density. The loss of prime agricultural land is at a paradox with NPPF, DEFRA, and The Governments 25-year environment plan. The local authority has already publicly stated that:-

Felixstowe Peninsula: General Policies The Local Plan states that further large scale development would be inappropriate because of the potential damage to the character of the Peninsula and its settlements. New Housing: Scale and Location The Structure Plan does not include specific housing requirement figures for the Felixstowe Area. The Trimleys, Trimley St Martin and St Mary have been identified as
Villages for a number of reasons: 1. to protect and recognise their character; 2. to allow a period of assimilation after two decades of rapid growth; 3. to maintain the open character of the land which separates them from each other and Felixstowe. Estate-scale development, therefore, will be strongly resisted.”

This suggests that the DLP is supporting negligent action and aware that its delivery will damage the landscape character of the region. It, therefore, fails the sustainability rules set out in the NPPF and also fails to meet the criteria for sustainable development as defined by the Bruntland Report in 1987. It is unsound for those reasons and also because it does not place a future value on the agricultural land it seeks to develop as a UK asset for food production in a post-Brexit Britain. The Local Plan needs redrafting taking into account verified employment statistics based on real-time data and also taking into account the impact on the local landscape character of the region and the environment. The sustainability pillars of Economic, Environment, and Social must be in balance and harmony with each other.

2. 18. The identification of settlements is incorrect regarding the Trimley Villages. They are rural large villages and as such must be subject to the planning criteria appropriate to that classification under SCLPS. They are separated and distinct from Felixstowe Town Centre with individual identities and characters going back to the Domesday Book.