Matter 3: Area Specific Strategies – Development Allocations

Issue: Are the proposed Area Specific Strategies, allocations, and policies justified, effective, and consistent with national policy?

General Questions relevant to all proposed site allocations

Site allocation cannot be viewed in isolation but must take into account the impact of Creeping Normality, Coalescence, and loss of landscape character and identity, plus the underlying requirement for housing levels based on a robust evidence base. The fact that the local plan concentrates a significant percentage of the overall DLP housing levels within a peninsula with just one major road in and out and a single bridge linking with the mainland immediately highlights major road and transport infrastructure shortcomings and potential utility infrastructure issues. It is unsustainable development as the sustainability pillars of economic/environment and social are not in balance. It contradicts Government policy within their 25 year environment plan


and also is at variance with Para 8 of the NPPF which states that the environmental objective is to continue to protect and enhance the natural environment making effective use of the land and mitigating climate change.

Policy SCLP12.65 Land off Howlett Way, Trimley St Martin

3.90 Trimley St Martin is a large rural village and subject to the criteria as set out in SCLP5. The density of housing allocated to this site in the FAAP is unsustainable and this site also fails to meet the SCLP7.1 & SCLP10.3/4 criteria for sustainability development, landscape character, and coalescence. The land is high-grade agricultural land that under the NPPF and Government/Defra statements regarding the 25-year environment plan must be protected for long term food production. The development will damage the open landscape character of this Domesday listed village and will lead to a coalescence through the accumulation of developments with the adjoining village of Trimley St Mary. The road infrastructure is unsuitable for the increased level of traffic proposed and the infrastructure inadequate to support such housing density. This development along with the proposed developments at Reeve Lodge, The Hand In Hand and Mill Lane will completely urbanise the villages.

Policy SCLP12.66 Land adjacent to Reeve Lodge, Trimley St Martin

3.92 Trimley St Martin is a large rural village and subject to the criteria as set out in SCLP5. The density of housing allocated to this site in the FAAP is unsustainable and this site also fails to meet the SCLP7.1 & SCLP10.3/4 criteria for sustainability development, landscape character, and coalescence. The land is high-grade agricultural land that under the NPPF and Government/Defra statements regarding the 25-year environment plan must be protected for long term food production. The development will damage the open landscape character of this Domesday listed village and will lead to a coalescence through the accumulation of developments with the adjoining village of Trimley St Mary. The road infrastructure is unsuitable for the increased level of traffic proposed and the infrastructure inadequate to support such housing density. There is no sufficient buffer zone to prevent coalescence with the adjoining boundary of Trimley St Mary.

3.94. The provision of a large primary school is dependant upon the need for the housing which is dependant on the validity of the employment growth data. As the employment data is un-validated and therefore lacking robustness these proposals are all unsound in terms of sustainability. The accumulative impact of such a concentrated density of new large scale developments would destroy the open landscape character of this rural large village and is outside the policy criteria under SCLP5. To justify this by indicating that the Trimleys are part of Felixstowe town is a contrite attempt to support unsustainable housing densities and allocations to suit an uncomfortable relationship between a large landowner and the council to “dump” housing levels within the Felixstowe peninsula. It is transparently unsustainable development and therefore the DLP is unsound.