**REPRESENTATION BY THE KIRTON AND TRIMLEY COMMUNITY ACTION GROUP**

**SUFFOLK COASTAL DISTRICT COUNCIL LOCAL PLAN**

**POLICY SCLP 12.65 – LAND OFF HOWLETT WAY – ALLOCATION CARRIED FORWARD FROM THE FELIXSTOWE PENISULAR ACTION PLAN – 360 DWELLINGS**

**POLICY 12.66 – LAND ADJACENT TO REEVE LODGE – HIGH ROAD, TRIMLEY ST MARTIN**

**PART 1**

**Introduction**

1. This submission is advanced by Kirton and Trimly Community Action Group (“KATCAG”) in response to the SCDC Local Plan policies 12.65 and 12.66. It is KATCAG’s submission that these policies fail to meet the tests of soundness and should be struck out or modified, as appropriate.
2. Whilst developments elsewhere on the Colneis lie beyond the parish boundaries of Kirton, Trimley St Martin and Trimley St Mary, they inevitably have an impact on the quality of life of all residents.  In September SCDC said they had achieved a five-year housing land supply, but the expectation is that the target will be increased.  Either way, 2016 saw a bewildering series of plans for housing development coming forward.
3. The status of SCLP 12.65 – Land off Howlett Way is already allocated and has been carried forward from the Site Allocations and Area Specific Policies Development Plan
4. To understand the arguments presented by KATCAG reference should be made to three short tables namely

a) Housing (extracting figures from tables 3.2 (page 38), table 3.3 (page 39), table 3.5 (pages 45 – 48),

b) Population (using the figure of 2.4 persons per dwelling as provided by the Office for National Statistics) and

(c) Vehicular traffic (using the figure of 1.47 per household as determined by a parking study detailed later in this submission

1. Working on the basis that the housing requirement and projected employment figures are linked, with the latter tending to drive the former, it is the submission of KATCAG that this Plan has failed to meet the tests of ‘soundness’ in respect of each of the following elements:

**Not Positively Prepared – Employment**

1. The baseline jobs growth figure for 2018 – 2036 is given as 6,500. This is a gross figure and does not take account of job losses. With an existing employment total of 59,100 this amount represents a growth of 11% - 360 jobs pa. This is a gross figure and there is no evidence to indicate how potential job losses might influence that figure. It is unclear if the Plan is taking ‘job losses’ into account.
2. It is our contention a significant element of the SCDC strategy for job growth is built around:
3. The employment opportunities to be found at Felixstowe Port, BT and Sizewell C
4. Adoption of the proposal for Innocence farm
5. **The available evidence points overwhelmingly to conclusions that firstly; none of the employers referred to above are likely to produce significant job growth and secondly, that proposal for Innocence Farm, even if approved, is most unlikely to result in any significant increase in jobs**.
6. Both the Port and BT are in the process of reducing their workforce and the workforce at SizewellC will be transient until circa 2030. Those locations apart, there has been no clear indication as to where any significant number of new jobs will arise. The Plan fails to acknowledge:
7. direct employee numbers at the Port are less than they were several years ago, even though throughput has increased
8. further reductions are planned as AI technology advances.
9. Its own evidence base, the Lichfields Port Study 2018,bases the future Port-related need for additional land allocation and housing on previous technical evidence carried out in 2008.
10. The Sustainability Appraisal - Figure 38 – Page 98 depicts the employment trends across SCDC. Para 3.154 refers to ‘Transportation and Storage’, which at 16.3% is almost four times that of the regional (4.6%) and national figures (4.7%) and is largely the result of employment at The Port.
11. However, these are 2015 figures and much has changed at The Port in the meantime in terms of automation and employment which shall clearly affect future job opportunities. Therefore, such comments which pertain to 2015 are misleading in the light of subsequent developments at The Port.
12. As an example, according to the Port Technology website The Port has placed an order with Siemens for eight gantry cranes to become operational in 2019 stating “designed to reduce the carbon footprint of The Port and will set off the first steps of gradual automation”.
13. Uniserve announced on their website for operational reasons they have taken an indefinite decision to move a number of Asian inbound consolidation LCL services to the Port of Southampton.
14. The Royal Haskoning DHV Report provides a comparative TEU capacity figure study between Felixstowe and its competitors namely, Liverpool, Southampton, Tilbury and London Gateway and how the latter ports are all planning extra TEU capacity and/or new terminal. In the case of London Gateway, they have sufficient water frontage to double the number of berths if required.
15. BT announced publicly, in 2018, they intend reducing their worldwide workforce by 13,000, to include 9,000 jobs losses in the UK, which is expected to include a reduction of 900 at Adastral Park (BT press releases)
16. SCDC have benefitted from economies of scale as a result of the forthcoming merger with Waveney, which will see the joint workforce greatly reduced, from 1,350 to about 730.
17. The High Street retail and banking sectors have each suffered from customers moving to on-line shopping. The fact that both Tesco and Asda pulled out of developing stores in Felixstowe and Walton together with the more recent announcement of the closure of M&S in Felixstowe plus 11 empty retail outlets (5/2/19) in Felixstowe High Street testify to this fact.
18. The Plan claims that between 2001 and 2016 employment grew by 13.4%. According to Nomis figures, 59,100 people were in employment in 2017, which suggests that between 2001 and 2016, approx 7,000 jobs were created thus averaging 440 per year. Only 2,600 jobs were created between 2011 and 2016, which is just over 50% of the number predicted between 2001 - 2016.
19. Mr Ian Cowan of Trimley St Martin has carried out some very detailed research into the evidence to support the need for 6,500 jobs. When this research is reviewed in conjunction with the SCDC responses to his FOI requests. It is clear SCDC have significantly failed to demonstrate the provenance of figures pertaining to earlier year’s aspirational job figures/losses. Consequently, huge doubt is to be placed upon the veracity of the figure of 6,500.
20. What has been happening at The Port in terms of advancing technology is a ‘red flag’ as to how this field is influencing employment growth.
21. In respect of ‘Automation’ PWc UK have analysed 200,000 jobs in 29 countries to explore the benefits and potential challenges posed by automation. Their headline findings are as follows:
22. $15tn potential boost to global GDP
23. 3% of jobs at potential risk of automation by early 20s’
24. 30% of jobs at potential risk of automation by mid 30s’
25. 44% of workers with low education at risk of automation by mid 2030s’
26. <https://www.pwc.co.uk/services/economics-policy/insights/the-impact-of-automation-on-jobs.html>
27. Referring to the UK, PWc UK comment as follows:
28. 7m existing jobs displaced by automation from 2017 – 2037
29. 7.2m jobs created therefore a net gain of 200,000
30. Whilst some sectors will benefit disproportionately i.e. Health, Scientific & Technical, Communications, Hospitality, Education
31. Other sectors could fall i.e. Manufacturing – 25%, Transport & Storage – 22%, Public Administration – 18%
32. <https://www.bbc.co.uk/news/business-44849492>
33. The Plan has failed to adequately demonstrate the significant impact future automation will have upon employment opportunities. The lack of a commissioned report into this field of employment could have resulted in a completely different analysis and outcome.
34. SCDC have produced no evidence to show the number of jobs to be created during the lifetime of the current Plan. Their future projections of creating 6,500 jobs appear to be a triumph of optimism over logic and reasoning. There is little confidence they will succeed resulting in 11.7ha of food producing farmland being sacrificed to accommodate 4,028 dwellings on grade 2 prime agricultural land that are not required!

**Not Positively Prepared – Housing**

1. **On the basis that the allocation of Innocence Farm is unsound (submissions from Katcag and local Parish Councils), we additionally contend The Plan is further unsound in respect of the disproportionate amount of housing supply allocated to Felixstowe and the Trimley Villages and the inability of the Villages to sustainably support the additional proposed growth**
2. The Plan has failed to demonstrate the need for such widespread development given the unrealistic assessment of employment growth, upon the basis that job creation drives housing
3. When comparing the number of dwellings completed, under construction and/or subject of permissions & resolution etc, on the Felixstowe r (including Walton and the Trimley villages) there is a clear imbalance in comparison with the rest of the district.
4. Housing Growth between 2016 – 31.03.2018

|  |  |  |
| --- | --- | --- |
| Parish | Location | No of Proposed dwellings as at 2016 |
| Felixstowe | Walton Green North | 385 |
|  | Walton Green South  | 190 |
|  | Conway Close | 153 |
|  | Anzani House | 197 |
|  | Ferry Road | 198 |
|  | Gulpher Road/Candlet Road | 560 |
| Trimley St Martin |  Howlett Way | 360 |
|  | Mushroom Farm (now Cavendish Grove) | 66 |
|  | Trimley Sports & Social or Land opposite Hand in Hand | 70 |
|  | Seamark Nunn | 69 |
| Trimley St Mary | Land adjacent Mill Farm/Thomas Avenue | 50 |
|  | Josselyns or Thurmans Lane | 41 |
| Martlesham | Brightwell Lakes | 2,000 |
| Bucklesham, Kirton & Falkenham, Levington, Newbourne,Waldringfield | Rest of r | 17 |
| Total |  | 4,375 – 62.5% |
| Rest of SCDC District |  | 2,623 – 37.5% |

1. The situation for Trimley St Martin becomes worse if consideration is given to future allocation of ‘potential sites’ (417 dwellings) in the area which, for the time being at least, have been discounted in favour of SCLP 12.66.
2. The Plan – Table 3.5 para 3.49 describes housing growth on the peninsula between 31.03.2018 – 2036, which arises from the cumulative indicative contribution 2018-2036.The published table has been adapted to reflect the contribution from the peninsula.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| District | APermissions & Resolution to grant permission as at March 2018 | BExisting Allocations without permissions as at March 2018 | CNew Housing Allocations | DCumulative Indicative Contribution 2018 – 2036A + B + C | % Growth |
| Felixstowe | 1,523 | 209 | 1,520 | 3,252 | 29% |
| Trimley St Martin & Trimley St Mary | 266 | 360 | 150 | 776 | 7% |
| Brightwell Lakes | 2,000 | 0 | 0 | 2,000 | 17.5% |
| Rest of peninsula – Bucklesham, Kirton & Falkenham, Levington, Newbourne & Waldringfield | 83 | 0 | 62 | 145 | 1.3% |
| Total | 3872 | 569 | 1,732 | 6,173 | 54.3% |
| Rest of SCDC | 2,150 | 407 | 2638 | 5195 | 45.7% |
| District Total | 6,022 | 976 | 4,370 | 11,368 |  |

1. Felixstowe and the Trimleys are absorbing 36% of the total amount of housing across the District. This will produce a population increase of approx 1,800 who will have be serviced by the existing infrastructure. The only new benefit would appear to be a new school. This increased number of people, together with the effect of closing the walk-in service at the Felixstowe General Hospital, will place an intolerable burden upon local GP surgeries
2. Such an increase in population will also directly impact upon serious incidents attended by all emergency services, especially ambulance crews, a dental surgery (nearest 1.6m away from Trimley St Martin), and the nearest Pharmacy is in Felixstowe. The new Trimley Villages housing will also have a huge impact upon access to the local convenience store with integral Post Office, leading to a significant increase in anti-social parking issues. The Plan has failed to address the consequences of the cumulative impact of all the Trimley Villages developments upon local residents
3. The existing infrastructure is not able to support the additional housing growth. The presence of the proposed new school (approx 400 pupils) will have an additionally huge impact upon the local convenience store notwithstanding safety concerns at the roundabout.

1. A sustainable community continually adjusts to meet the social and economic needs of its residents, while preserving the environment’s ability to support it. A sustainable community uses its resources to meet current needs while ensuring that adequate resources are available for future generations. This cannot be said of the current proposals. The Plan has failed to demonstrate what SCDC propose doing to enhance the community in terms of infrastructure, in particular as a consequence of the cumulative effect of the new housing. The Plan is therefore not sustainable and is unsound.
2. In respect of ‘settlement hierarchy’, it is understood the designation of ‘Large Village’ is a matter of judgement for the Inspector. Trimley St Martin and Trimley St Mary were formerly deemed ‘Key Service Centres’ as they attracted four of the five relevant criteria. As ‘Key Service Centres’, they would not have attracted the current level of proposed housing development.
3. According to ‘footnote 17 – page 39 of The Plan, the basis upon which SCDC have focused the large allocations is because of what is defined as ‘the strong functionality relationship’ between the villages and the adjacent town.
4. According to Wikipedia the Doomsday Book entries for Trimley St Martin and St Mary show there have been a number of farms and households in the area. Archaeological findings in the Hams Farm area (Kirton/Trimley St Martin) show evidence of prehistoric, Roman, Anglo-Saxon and late post-medieval working.
5. In nearby Walton archaeological findings show evidence of Bronze Age field systems in use. The High Road through the Trimleys and Walton follows the line of the former Roman Road through Trimley St Martin that linked with the Roman fort of Walton, which was destroyed through coastal erosion in the 18th century.
6. In the Middle Ages this area was often invaded, overrun, settled and populated by a variety of Scandinavian plunderers. During the 18th century Felixstowe became an emerging seaside destination for the wealthy and was also a significant defence port during Napoleonic times and later hosting a seaplane base that was operational during the 1st World War
7. In the 1800’s Trimley St Martin was mined for coprolite, such is the fertile richness of the soil. During the 1950’s Felixstowe Docks were regenerated. They became the only independent dock in the UK and were therefore largely free from industrial strife. During the 60’s manpower migrated from the land as a consequence of intensive farming processes, many of whom were local residents, to the docks leading to an expansion in labour force. It was the pre-eminence of the docks that kept people in the area.
8. The Port became the largest container port in the UK and has prospered. In more recent times technology has advanced, automation is gradually becoming more important and as a consequence the workforce is declining.
9. The Port is also facing competition from Southampton. London Gateway, Liverpool and Tilbury, whom have recently acquired approval to double their capacity. The proposal to create another link between Essex and Kent has passed the consultation phase and if implemented, is likely to lead to increased activity at Tilbury and London Gateway.
10. Up to circa 2017 there was a very close connection between The Trimleys and The Port through local manpower as a consequence of the expanding port and was supported through increased housing allocations and with a view to meet increasing needs for increased affordable housing. However, part of that premise can no longer apply in view of the declining manpower requirement at the port.
11. The Office of National Statistics state the average household has remained at 2.4 people between 2006 and 2016. The population of Felixstowe/Trimley went down between 2001 and 2011 and estimates for 2018 show only a very small increase
12. The conditions that were present in 2012 led to a need for increased development and again in 2016, perhaps to a lesser extent, but today they are not the same. The employment opportunities are not present in this area to warrant such number of dwellings.
13. Allocations would be better distributed to areas with better strategic infrastructure but not in areas such as the Trimleys where the infrastructure does not currently exist.
14. The proposed developments will create enormous pressure upon local infrastructure in the short to medium term, which has not been addressed within The Plan. In addition, the developments would materially, demonstrably and adversely affect the essentially rural character of these two historic villages. The Plan is therefore not effective and is unsound.
15. The Trimleys sit in a rural setting nestling between the Rivers Orwell and Deben, their character has long been recognised by Suffolk Coastal District Council. They have made it clear many times in the past that “further large-scale development would be inappropriate because of the damage to the character of the Peninsula and its settlements”.
16. People live here BECAUSE of its character and countryside. The wildlife is plentiful. Despite the A14 being opening in 1974 (which cut the parish in two), birds singing in the Spring can still drown out the endless traffic noise. To the West of the village lie the Trimley Marshes, home to a stunning amount of bird life.
17. As you come off the Trimley Roundabout down Howlett Way to approach Trimley St Martin you are struck by the lovely open view across the field on the left-hand side. Upon approaching the roundabout and, before the temporary appearance of Volker Fitzpatrick workings, one would be confronted with another wonderful view across open farmland through to woodland and beyond toward the River Orwell. These views immediately give you a feeling of being in unspoilt countryside. It is not unusual to see deer here, you can see all manner of wildlife and so popular with ramblers, dog owners and horse riders. The changing seasons and the views are a great asset to all.
18. Turning left again off Howlett Way you soon pass the Grade 11 listed church of Trimley St Martin. It is here that Sir Thomas Cavendish was baptised. It is He who you see on the village sign. It is his birthplace. He was the second circumnavigator of the globe, following Sir Francis Drake.
19. Today the village remains a wonderful place to live. The community is friendly and retains its individuality.
20. As much as it can be in this modern age it has just about retained its uniqueness. It is important to preserve and look after this historical village and leave the countryside to flourish for centuries to come.
21. According to a statement made by SCDC :
22. 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. The Trimley villages have long been identified as villages for a number of reasons:

* To protect and recognise their individual character
* To allow for a period of assimilation after two decades of rapid growth
* To maintain the open character of the land which separates them from each other and from Felixstowe
* Estate – scale development, therefore, will be strongly resisted”
1. After recent and approved developments the above points must still apply
2. Para 122 of NPPF – Achieving appropriate densities refers to:
3. “the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or promoting regeneration and change”
4. In this case the need to promote regeneration is not necessary for that has effectively been achieved through recent, current and approved developments. The imposition of this unnecessary amount of proposed development shall significantly and detrimentally destroy the quaintness and uniqueness of this village and surrounding area thus fail to ‘maintain the area’s prevailing character. To that end The Plan has failed to justify their proposals and is therefore unsound.

1. Reference The Plan, Table 3.5 page 45. To demonstrate the unfair distribution of housing/growth toward the Trimley Villages – classified ‘Large Villages’, when compared with the distribution to other Large Villages across the District. The following table has been adapted to illustrate the unfairness between 2016 to 2018

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| District | Permissions & Resolution to grant permission as at March 2018 | Existing Allocations without permissions as at March 2018 | New Housing Allocations | Comulative Indicative Contribution 2018 - 2036 |
| SCDC District | 6,022 | 976 | 4,370 | 11,368 |
| SCDC Large Villages | 222 | 165 | 411 | 798 – 50.7% |
| Trimley St Martin  | 161 | 360 | 150 | 671 – 42.6% |
| Trimley St Mary | 105 | 0 | 105 | 105 – 6.7% |
| Total Large Villages - SCDC district | 488 | 525 | 561 | 1,574 |

1. According to the above table the Cumulative Indicative Contribution to the 2018 – 2036 housing destined for Large Villages is 1,574 – 13.8% of the total sum of 11,368 across the District. The contribution from Trimley St Martin and Trimley St Mary is 776 – a whopping 49% of the ‘Large Village’ total. No other ‘Large Village’ has been singled out in such a way.
2. In fact the total is greater than that apportioned to all of the Market Towns with the exception of Saxmundham.
3. Looking at the Trimley Villages from another perspective, that of a significant increase in traffic, particularly at a pinch point at the roundabout by High Road and Howlett Way. Completed development and existing development approvals in The Villages realise approx 730 being sited within approx 650m of the roundabout and a further 70 dwellings in the same general locality within 1000m of the same roundabout.
4. In 2011 the Trimley Census population figure was circa. 1940.The existing and proposed developments in The Villages represent an increase of approximately 1900 people – almost doubling the population
5. The following Table describes the growth in population from 2001 to 2011 plus and estimated population as at 2017 with data taken from the Office For National Statistics

Growth in Population 2011 – 2036 as provided by Office for National Statistics

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | Population 2001 | Population 2011 Census | % Population growth 2001 - 2011 | Estimated population as at 2017 | % Estimated population growth 2011 - 2017  | % Estimated population growth 2001 - 2017 |
| SCDC District | 115,239 | 124,590 (+9,351) | 8.1 | 129,018 (+4,428) | 3.5 | 13,779 (11.96) |
| Felixstowe | 24,052 | 23,689 (-363) | -1.51 | 24,521 (+832) | 3.5 | 469 (1.95) |
| Trimley St Martin  | 1,945 | 1,942 (-3) | -0.2 | 2,033 (+91) | 4.7 | 88 (4.6) |
| Trimley St Mary | 5,617 | 5,606 (-11) | -0.2 | 5,657 (+51) | 0.9 | 40 (0.7) |
| Total Felixstowe & Trimley Villages | 31,614 | 31,237 (-377) | -1.2 | 32,211 (+974) | 3.1 | 597 (1.89) |

1. The level of existing and proposed new housing destined for Trimley St Martin cannot be justified because it is far in excess of the local need, given the population has remained stable for the past 10 years and in addition cannot be justified from the highly questionable ability of meeting the projected employment figures for the District.

**Not positively prepared – Windfall Allocation**

1. According to NPPF para 70:

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence they will provide a reliable source of supply. Any allowance should be realistic have regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends”.

1. Para 2.33 of the SHELAA refers to the avoidance of double counting with sites identified as potential in the SHELAA, only average delivery rates of windfall sites below 0.2ha have been considered, which has been average of 97 per annum. The document makes no mention of the return from larger sites.
2. According to an SCDC response to FOI Request F0132916562 made by Mr Ian Cowan of Trimley St Martin in December 2018, the average yearly windfall numbers over the past 14 years have been an astonishing 331 dwellings. Annual published figures between April 2004 through to March 2018 reflect a total of 4,647 with the highest recorded at 553 in 2016 and the lowest recorded at 124 in 2014.
3. These figures notably conflict with The Plan’s allowance of 50 per annum figure now predicted for the period 2018 – 2036.
4. This startling lack of transparency and explanation has presented a most confusing picture and an apparent distortion of the published delivery targets, thus affecting the housing requirements of Felixstowe, the Trimley Villages and the rest of the District. It is therefore our contention the housing requirement has been clearly overstated, the level of development has not been justified and The Plan is.

**PART 2 - Infrastructure**

**Not Positively Prepared – Infrastructure - Water Management**

1. The Haven Gateway Water Cycle Study 2009 identified the sewage network in Felixstowe as close to capacity and suggested it would need significant expansion to cope with new development. The Study also stated that any scale of significant housing growth in the area would require off-site reinforcement works to water supply infrastructure and a new main was likely to be required for development in the East Ipswich.
2. The 2009 Study further identified foul-drainage capacity to deal with a modest growth of housing, but more substantial growth would require off-site reinforcement work for wastewater infrastructure.
3. The Felixstowe Infrastructure Study 2009 was prepared by Roger Tym & Partners to underpin the Spatial Development Strategy of the Core Strategy that was required to deliver approx 1,000 dwellings in Felixstowe and The Trimleys their findings included:
4. The requirements for waste water provision relate to the network for delivering wastewater (i.e. the sewerage pipes) and the facility at which it is treated, i.e. the Wastewater Treatment Works (WwTW). In general terms, Anglian Water had commented that due to the location of WwTW, there were no options for direct connections to the works. Thus, improvements would be required to be made within the network by upsizing the existing pipework.
5. Determining the degree of improvement needed would require a full assessment of each site, including its location and onsite drainage plans (including appropriate surface water disposal, such as sustainable urban drainage systems). The redevelopment of brownfield sites would require a minimum of like with like or betterment. However, until specific individual site locations were known such detailed assessment could not take place.
6. There was sufficient capacity of wastewater treatment infrastructure for all three stages of the growth scenario, **however the sewerage network for all options has limited capacity and would require significant infrastructure investment to accommodate any growth.**
7. Anglian Water had advised that there was wastewater treatment capacity available for all three phases of the growth scenario, subject to further detailed assessment of development sites. **However, the sewerage network in the area of the Trimleys, and to the north of Candlet Road had limited capacity, and improvements would be required. Furthermore, the sewerage network in Felixstowe had no available capacity and major improvements would be required to accommodate any future development.**
8. Individual improvements to sewage capacity to enable developments to go ahead would be priorities for developers. The extent to which this may inhibit development would become apparent when Anglian Water responded to individual applications.
9. **Provision of additional sewerage capacity would become a priority from 2015 onwards to ensure that the later phases of growth could be served.**
10. According to the 2009 Study the Council would need to work closely with Anglian Water to ensure that improvements required for Phases 2 and 3 (of the growth programme) are included in the Asset Management Plan (AMP) to reduce the costs on developers as far as possible.
11. According to The First Draft Local Plan – July 2018 the Infrastructure Delivery Framework chart under ‘Utilities’ indicates ‘Potential improvements to Trimley St Martin Water Recycling Centre’ with unknown costs to be borne by the developer. This reference is missing from The Plan (page 455) which just refers to ‘Potential improvements to Felixstowe water recycling centre and supporting infrastructure’. A confusing situation as to the actual extent of the waste issues.

1. The Haven Gateway Study 2009 refers to the fact both Felixstowe and Trimley Treatment works discharge directly into the Stour and Orwell estuaries.

1. It is unclear what the Plan is trying to convey in terms of where improvement works need to be carried out
2. According to Felixstowe Infrastructure Study 2009 capital spending on waste water services is funded by the revenue collected from existing customers. At that time Anglian Water produced a 5-year Asset Management Programme (AMP) approved by OFWAT. The current 5-year plan at the time was expected to be determined shortly, to identify all needs over the following five years.
3. According to the same Study none of the needs identified as part of the growth options had been promoted as part of the Anglian Water final business plan for the current AMP being considered by OFWAT. Therefore, if Anglian Water was to provide any of the solutions they would have to be part of the bids within the next AMPs (either post-2016 or post-2021)
4. Alternatively, the developer would have been able to bring forward the planned improvement works sooner by making a contribution up front to ensure the works takes place at an earlier date. On large developments, Anglian Water would expect to see developer contributions being used to support early delivery of wastewater facilities. The Study would consider that contribution to be treated as part of the costs of development.
5. According to The Study Anglian Water only paid for wastewater services related to residential development. The costs for serving employment and retail development were expected to be met in full by the developer. Unless contributions have been changed in the meantime this would suggest that developers would be responsible for the water infrastructure costs associated with the proposed Innocence Farm development (SCLP 12.35)
6. According to para 12.59 page 204 of The Plan – “Development proposals at Felixstowe should have regard to the findings of the Suffolk Coastal & Ipswich Cross Boundary Water Cycle Study which indicates capacity limitations at Felixstowe Water Recycling Centre. Evidence will be required to demonstrate how capacity will be made available in time to serve proposed development. Over the plan period the Council will work with Anglian Water to ensure that improvements funded through the Anglian Water Asset Management Plan are delivered in a timely manner alongside the delivery of the Garden Neighbourhood. Solutions will need to be considered at the master-planning stage”.
7. The Plan – page 455 under the heading ‘Project’ and ‘Essential’ “Potential improvements to Felixstowe water recycling centre and supporting infrastructure” of unknown costs to be borne by the developer. According to para (....) above mention (2009 Study) was made of ‘no options for direct connections to the works thus improvements would be required to be made within the network by upsizing the existing pipework’.
8. In 2018 there was a need for Binders Waste Management Service to attend the recent housing development at The Josellyns, Trimley St Mary on more than one occasion to pump out waste. Is this an indication of what is to expect in the future through failure to heed earlier warnings.
9. Given the amount and of development that has taken place since 2012 and the scale of what is now proposed it is not clear if such forthcoming infrastructure works will amount to a ‘capital expense’ to be borne by Anglian Water. According to The Plan it is Anglian Water’s responsibility to invest in sewage treatment capacity to cope with an increase in population. Anglian Water is scheduled to invest £58m between 2015 – 2020, but no mention is made as to how those funds are going to be invested within the SCDC District.
10. According to the Anglian Water website they have recently announced an investment of £15m to construct new treatment works at Little Wratting serving the Haverhill Area of West Suffolk.
11. The Plan Evidence Base includes a Cross Boundary Water Cycle Study prepared by Wood Environment & Infrastructure Solutions UK Ltd dated January 2019, page 65 refers to the fact ‘additional water treatment capacity’ will be required at 7 sites including Felixstowe in 2030. The authors of the report do caveat themselves stating the assessment is indicative only and is not representative of precise investment requirements for Anglian Water.
12. Whilst Q80 (20%-ile) flows are recognised as a good indicator of flow compliance, flows are only non-compliant if Q90 (10%-ile) is breached. Nonetheless, in response to specific housing and employment site queries from SCDC17, Anglian Water have indicated that enhanced treatment capacity will be required at Framlingham (by 2020) and Kirton WRCs, and may also be required at Yoxford WRC (by 2025). No mention of a date for Kirton.
13. This Study does not mention Trimley St Martin Treatment Centre nor does it make reference to the findings from the earlier studies and how they vary with the 2019 study. The Plan Delivery Framework chart does not mention Kirton WRC yet reference is made at para 12.768 in The Plan
14. Policy SCLP 3.5 page 56 of The Plan refers “Specifically, developers should provide evidence to ensure there is capacity in the water recycling centre and the wastewater network in time to serve the development. Where there is no capacity in the water recycling centre, development may need to be phased in order to allow improvement works to take place. The agreed improvements should be in place before occupation of the proposed dwellings in order to avoid a breach of environmental legislations”
15. However the developer is only responsible for the additional burden their development would create not any existing deficits in the quality of the existing network
16. Given the earlier ‘red flags’ regarding Felixstowe Water Re-Cycling Centre and the lack of action to address such needs at an earlier date the potential amount of work to be undertaken appears unknown, in terms of scale, time and cost. However the 2019 Study appears to be a clear dilution of the findings described in these earlier studies and The Plan has failed to acknowledge the reasons for this. Consequently there is a huge difference between the earlier and latter delivery capabilities that would clearly affect the deliverability and thus viability of the growth sites.
17. These differences make the true situation most confusing therefore Katcag contend The Plan is undeliverable and consequently not effective and is, therefore, unsound.

**Not Positively Prepared – Infrastructure - Power**

1. The Felixstowe Infrastructure Study 2009 under ‘key findings’ stated that ‘no specific requirements for infrastructure have been identified at that stage (2012). However, it was indicated that, depending on the type of development taking place there may be a requirement for a new 33/11 kV substation, possibly between the Trimleys.
2. At the time the report indicated that funding would likely come mostly from developers and would need a lead-in time of two to three years.
3. The Plan Delivery Framework page 454 identifies not only the above power need as ‘critical’ with a price tag of £35m but additional critical new primary substations at Innocence Farm and Sevenhills Roundabout. Whilst the funding source for the Felixstowe upgrade is shown as UK Power Networks & OFGEM, developers shall be responsible for funding the unknown indicative costs for the other two projects.
4. Given the earlier indication that developers would be largely called upon to finance the Felixstowe upgrade and that developers would also be called upon to finance the new primary substations how certain is it that developers will not be called upon to fund the ‘potential funding gap’. If that is the case then that could affect the viability of these particular projects and thus render The Plan as undeliverable and therefore unsound.

**Infrastructure - Local Transport Effect**

1. The Local Plan has identified that access from the proposed development onto Howlett Way needs to be considered through a transport assessment as part of any future planning assessment. However there needs to be a far wider assessment to consider the impact upon the pinch point at the roundabout at the junction of High Road (C Class Road) and Howlett Way especially during peak hours.
2. The amount of additional vehicles arising from existing and proposed housing developments, together with dropping off/pick up for the proposed primary school and early years provision, is likely to significantly increase vehicle movements in the immediate area with every likelihood traffic queues will tail back along the High Road and the A14 at regular intervals
3. Safety issues shall arise with students crossing the busy High Road and when buses stop at their appointed stops either side of the road opposite Reeve Lodge and near to a traffic island congestion often arises.
4. Congestion is already a problem for the High Road, with vehicles casually parking outside McColls convenience store and Post Office, the only convenience store for approx 1.5 miles. The store is approx 300m from the roundabout at the junction with Howlett Way.
5. Local residents emerging from nearby side streets already experience difficulties entering the High Road and particularly emerging from Church Lane where it can be difficult to see properly due to parked vehicles and HGVs delivering to the store
6. Surveys currently indicate approximately 1000 vehicle movements an hour at peak times on the High Road in this area), and when vehicles arising from the proposed housing developments at Howlett Way and Reeve Lodge are taken into account the general traffic situation will be exacerbated and significantly increase safety risks to pedestrians.
7. HGV traffic issues can also arise following a serious incident on the A14 leading to HGVs negotiating the High Road. The likelihood of that increasing will rise sharply should the Innocence Farm proposal (SCLP 12.35) with the anticipated 3200 daily HGV movements and 600 cars. The whole traffic situation will significantly worsen following unforeseen closures of the Orwell Bridge. A separate submission has been submitted in respect of SCLP 12.35.
8. A Space to Park Report was produced by Urbanism Environment & Design (URBED) as part of the ‘Space to Park’ research project involving collaboration between URBED, Edinburgh University and Kent County Council. A survey of new occupants in respect of vehicle ownership residing in excess of 400 new housing schemes across Kent over a 5yr time period determined a figure of 1.47 vehicles per household. It is possible this figure may have increased during the intervening years.

1. Applying this figure against existing new and proposed Trimley developments will realise an approximate additional 1100 vehicles in the two villages thus increasing congestion at the pinch point. The significant increase in traffic within the Trimleys has not been acknowledged in The Plan
2. When the 1.47 figure is applied to existing new and proposed dwellings across the Peninsula (approx 3800 dwellings) approximately 5,500 additional vehicles shall need to be accommodated. This will clearly impact upon existing parking facilities, especially during inclement weather and affect tourism during the summer – nowhere to park and existing pinch points. Every new house generates an average of five traffic movements per week day.
3. It should also be considered that many local drivers with children on board and for safety reasons may be more likely to travel the High Road into Felixstowe rather than the A14.
4. To the 5,500 figure must be added the 3,200 HGV and 600 other vehicle movements anticipated at Innocence Farm, all adding to an already congested A14.
5. The significant increase in vehicular movements give rise to wider traffic implications affecting parking, car parks and pinch points for example. The Plan has failed to acknowledge the impact at a more local level within Felixstowe and its environs and identifying appropriate mitigation solutions therefore it has not been properly prepared and is unsound.

**Environmental Impacts**

1. There are published comments from 2003 addressing the need to develop Grade 1 and 2 land by exception, taking proper account of infrastructure issues, protecting agricultural land and wildlife, and preserving the uniqueness of villages. The Natural Environment have sustained life, both human and animal for many centuries. We already know that Pollution, Air, Light and Noise, affects humans and devastates animal habitats. Mindful of these studies, it is contended The Plan fails to properly consider the health implications of its proposals, especially the impact of Innocence Farm.
2. Michael Gove, the Environment Secretary, said recently we should use valuable farmland to grow more food, particularly as we face post-Brexit. He urged us to make the most of our reserves. Fertile land is disappearing, swamped under development. We cannot continue to rely on food imports.
3. Once farmland is covered in concrete, it is already too late to reverse the situation and lives will change forever; the land and its wildlife will be lost forever. The Local Plan states that within Material Assets there are *"extensive areas of high-quality agricultural land."* However, it proposes this irreplaceable food-producing farmland should be destroyed in order to build thousands of new houses when they are not necessary, without stating how food production facilities will be replaced.
4. A further soundness issue focuses on the potential destruction of wildlife and the wide range of wildlife habitats evident within the Trimley Parish. Much of this will be destroyed if the Plan is approved in its present form. An environment constructed by humans fundamentally changes the countryside and destroys farmland. To quote Sir David Attenborough “if we continue to interfere this much with the Environment we will harm the planet and ourselves and nature". We therefore content The Plan has failed to satisfactorily address these issues and is therefore not effective and unsound.

**General Points**

1. The Public Consultations by SCDC have not reached the majority of those who need to know. A huge percentage of villagers have no idea about the oncoming pollution that will be caused by dense house building on their surrounding farmland and the significant increase in HGV movements. There are references to the Environment in SCDC’s plans, but the information doesn’t make headlines. It hasn't been properly highlighted across the wider community and slips by most of the population, hence the activities of KATCAG.
2. The definition of ‘soundness’ and associated terminology baffles most people in the community. Despite the number of ‘Consultations’ the issues have never been 'headlined' and it is a fact a huge percentage of the village population has no idea what is going on at all! The majority of people do not really understand and appreciate what the impact of these developments will have upon Noise, Air and Light Pollution.
3. The SCDC guidelines on ‘soundness’ are vague to say the least. The explanations behind the four elements have not been presented in ‘laymans’ terms nor has there been sufficient and appropriate examples available to demystify the process. It is most difficult to determine under which element each ‘objection/point should sit. This I feel holds many members of the public back from commenting, and when they do the quality of the submissions are very limited in content.
4. Given the many active campaign groups across the SCDC area and elsewhere, it is clear SCDC are seriously failing to properly appreciate the serious misgivings of the respective communities, thus leading to seriously expensive campaigns for communities and significant costs incurred by SCDC to defend their actions. Their strategies of consulting and informing could be subject of some ‘blue-sky thinking’ to appeal to the wider community, resulting in better attendances and communications and thus lead to better decision making