



# Representation Form

## Make a representation on the Suffolk Coastal Final Draft Local Plan

This representation form relates to the Suffolk Coastal Final Draft Local Plan, which has been published under Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012 (as amended).

The representations period runs from **Monday 14 January to 17.00 on Monday 25 February 2019**. Representations received after this date may not be considered. Only representations received within this period have a statutory right to be considered by the Inspector at the Examination.

The representation form can be completed and submitted via:

- The Council's online consultation system at [www.eastsuffolk.gov.uk/finaldraftlocalplan](http://www.eastsuffolk.gov.uk/finaldraftlocalplan) (this is the Council's preferred way of receiving representations);
- Or complete a representation form (available to download from the consultation system or by contacting the Planning Policy and Delivery Team [suffolkcoastallocalplan@eastsuffolk.gov.uk](mailto:suffolkcoastallocalplan@eastsuffolk.gov.uk) / 01394 444557), and return via email to [suffolkcoastallocalplan@eastsuffolk.gov.uk](mailto:suffolkcoastallocalplan@eastsuffolk.gov.uk) or by post to Planning Policy & Delivery Team, East Suffolk House, Station Road, Riduna Park, Melton, Woodbridge, IP12 1RT.

Before completing a representation, please read the accompanying 'Guidance when Making a Representation', available at [www.eastsuffolk.gov.uk/finaldraftlocalplan](http://www.eastsuffolk.gov.uk/finaldraftlocalplan)

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in Part B for each representation you wish to make.**

By responding to this consultation you are accepting that your name and representation will be available for public inspection and published on line in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.

Name of the DPD to which this representation relates:

Suffolk Coastal Final Draft Local Plan

## PART A | Your Details

### 1. Personal details

### 2. Agent's Details (if applicable)

Title Mrs

First Name Rebecca

Last Name Todd

**Job Title**  
(where relevant) Parish Clerk

**Organisation**  
(where relevant) Waldringfield Parish Council

**Address**  
5 St. George's Terrace,  
Church Road,  
Felixstowe,  
Suffolk

Postcode IP11 9ND

**Telephone Number**  
01394 271551

**E-mail Address**  
pc.waldringfield@googlemail.com

## PART B | Your Representation

Please complete a separate form for each representation.

### 3. To which part of the Local Plan does this representation relate?

Paragraph number	<input type="text"/>	Policy Number	<b>SCLP 12.3</b>	Policies Map	<input type="text"/>	Appendix	<input type="text"/>
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### 4. Do you consider that this part of the Plan meets the legal and procedural requirements?

(See [guidance note](#) for assistance with this question)

Yes ☐

No ☒

### 5. Do you consider this part of the Plan has met the tests of soundness?

(See [guidance note](#) for assistance with this question)

Yes ☐

No ☒

### 6. Do you consider this part of the Plan to be unsound because it is not:

(See [guidance note](#) for assistance with this question)

Positively  
prepared ☐

Justified ☐

Effective ☐

Consistent with  
national policy ☒

### 7. Details of Representation:

Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Waldringfield Parish Council has concerns regarding the scale of the allocation at North Felixstowe, SCLP12.3, in particular the impact that a development of this size will have on the A14/A12. It is widely accepted that the Orwell Bridge is already at full capacity at peak times and both the A14 and the A12 are going to be under significant additional pressure when the development at Brightwell Lakes comes through.

The Plan says: “Any necessary off-site transport improvements will need to be provided to the satisfaction of Suffolk County Council and where appropriate Highways England, informed by a Transport Assessment” (SCLP12.3, p207). However, the Transport Assessment<sup>1</sup> says: “The potential development at land north of Felixstowe – North Felixstowe Garden Neighbourhood - which is included in Model Run 8 is assumed to contribute to increased congestion at the Dock Spur roundabout and within Felixstowe” (§3.4.11). Nowhere is the congestion on the Orwell Bridge considered,

<sup>1</sup> Local Plan Modelling For Babergh & Mid Suffolk, Ipswich And Suffolk Coastal Forecasting Report – Volume 2: Suffolk Coastal and Ipswich Preferred Option, Jan. 2019

and the combined effect of this development and the Brightwell Lakes one are also ignored. Policy SCLP2.2 (Strategic Infrastructure Priorities) contains many aspirational statements, such as “The Council will work with partners ... in supporting and enabling the delivery of key strategic infrastructure, and in particular the timely delivery of: ... (b) A12 improvements (c) A14 improvements” (SCLP2.2, p20), however, good intentions cannot be used to justify a plan.

The NPPF states:

“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

a) the potential impacts of development on transport networks can be addressed” (NPPF, §102)

There is no evidence that this has happened, in fact it is clear that the potential transport impacts of SCLP12.3 have not been addressed. SCLP12.3 is therefore inconsistent with the NPPF and violates the soundness criterion **(d) Consistent with national policy**

## 8. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound:

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

A thorough assessment of the transport impact of a development in North Felixstowe needs to be done before the Local Plan allocates any housing to the area. This should include the combined effect of this and the Brightwell Lakes development, and the impacts on the A14, A12 and Orwell Bridge. Waldringfield Parish Council believes this would show that the resulting level of congestion would be unacceptably high, and the only way of fixing this would be to significantly reduce the number of dwellings allocated to North Felixstowe.

## 9. If your representation is seeking a change, do you consider it necessary to participate in the public examination?

*Please note* the Planning Inspector will make the final decision on who will be invited to participate in individual sessions at the public examination, although all members of the public may observe the proceedings.

Yes, I wish to participate  
at the oral examination ☐

No, I do not wish to participate  
at the oral examination ☒

## 10. If you wish to participate in the public examination, please outline why you consider it to be necessary:

## 11. Being kept informed:

Yes, I would like to  
be kept informed ☒

You will be notified of Submission of the Local Plan to the Secretary of State for Public Examination; publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector’s Report); and adoption of the Local Plan.

No, I do not wish to be kept informed  
of future progress of the plan ☐

## 12. Date of Representation and signature:

Date 22 <sup>nd</sup> February 2019	Signature Rebecca Todd
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## 3. To which part of the Local Plan does this representation relate?

Paragraph number  Policy Number **SCLP 12.35** Policies Map  Appendix

## 4. Do you consider that this part of the Plan meets the legal and procedural requirements?

(See [guidance note](#) for assistance with this question)

Yes ☐

No ☒

## 5. Do you consider this part of the Plan has met the tests of soundness?

(See [guidance note](#) for assistance with this question)

Yes ☐

No ☒

## 6. Do you consider this part of the Plan to be unsound because it is not:

(See [guidance note](#) for assistance with this question)

Positively prepared ☒

Justified ☒

Effective ☐

Consistent with national policy ☒

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The apparent need for this development (Land at Innocence Farm) is not supported by quantifiable data and therefore fails to provide evidence-based justifications for proposing such a large scale allocation of land, which is “[well in excess of the employment land need identified in the evidence base for the whole District](#)” (§12.376).

This lack of evidence-based justification is even admitted by the statement: “[The level of future growth anticipated by the Study \[Port of Felixstowe Growth and Development Needs Study\] is subject to fluctuations dependent on a variety of outside factors ...](#)” (§12.378).

Since the 'objectively assessed need' for this development is not based on sound evidence, SCLP12.35 violates the soundness criterion **a) Positively prepared**. It also violates soundness criterion **b) Justified**, as there is no indication that reasonable alternatives (such as brownfield land nearer the port) have been considered.

It is difficult to imagine that any amount of mitigation could effectively minimise the impact on the area that a 24/7 haulage/warehouse operation of the type and scale of that described in §12.379 will have. The degradation of the environment, air pollution, noise pollution, light pollution, increased traffic movements and visual impact will have significant impact for several miles across the AONB as well as the immediate settlements of the Trimleys and Kirton. "*Retaining hedgerows and tree planting*" (§12.382) will do nothing to ameliorate these impacts. "*The site is expected to be operational 24 hours a day to reflect the operations of the Port of Felixstowe. Therefore, lighting and noise strategies need to be established within the context of the required landscaping and kept under review to reduce the impact of the development.*" (§12.379) It is difficult to see how 'lighting and noise strategies' could prevent severe impacts on the local communities – bright lights are needed for security and lorries create noise: no amount of 'strategies' will change that.

SCLP12.35 is therefore in conflict with the statement:

"Planning policies and decisions should contribute to and enhance the natural and local environment by: ...  
e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution"  
(NPPF §170)

It therefore violates the soundness criterion **(d) Consistent with national policy**

This is a greenfield site, of high agricultural value, which has been chosen in preference to brownfield sites closer to Felixstowe Port. It is therefore in conflict with the statement:

"Planning policies and decisions should:

c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;" (NPPF, §118)

It therefore violates the soundness criterion **(d) Consistent with national policy**

## 8. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound:

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

Reasonable alternatives, such as brownfield land nearer the port, should be considered

## 9. If your representation is seeking a change, do you consider it necessary to participate in the public examination?

**Please note** the Planning Inspector will make the final decision on who will be invited to participate in individual sessions at the public examination, although all members of the public may observe the proceedings.

Yes, I wish to participate  
at the oral examination

☐

No, I do not wish to participate  
at the oral examination ☒

**10. If you wish to participate in the public examination, please outline why you consider it to be necessary:**

**11. Being kept informed:**

Yes, I would like to  
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**3. To which part of the Local Plan does this representation relate?**

Paragraph  
number

Policy  
Number

SCLP  
12.25

Policies Map

Appendix

**4. Do you consider that this part of the Plan meets the legal and procedural requirements?**

(See [guidance note](#) for assistance with this question)

Yes ☐

No ☒

**5. Do you consider this part of the Plan has met the tests of soundness?**

(See [guidance note](#) for assistance with this question)

Yes ☐

No ☒

**6. Do you consider this part of the Plan to be unsound because it is not:**

(See [guidance note](#) for assistance with this question)

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There is no mention of this (Suffolk Police Headquarters, Portal Avenue, Martlesham Heath) in the previous version of the Local Plan (First Draft, July 2018). There has therefore been no opportunity for the public to comment on it from a planning perspective. There is a legal obligation for the Local Planning Authority to consult the public and other bodies on their plan, and this has not been done for Policy SCLP12.25.

The NPPF states:

*“Strategic policy-making authorities should ... also engage with their local communities ...” (NPPF, §25) and*

*“Plans should: ...*

*c) be shaped by early, proportionate and effective engagement between plan-makers and communities,” (NPPF, §16)*

As well as being unlawful, Policy SCLP12.25 clearly violates the above requirements of the NPPF, so fails the soundness criterion **(d) Consistent with national policy**

The statements in §12.227-§12.230 about the Martlesham Neighbourhood Plan are somewhat misleading – there is nothing in the Martlesham Neighbourhood Plan (July 2018) that supports a development of 300 dwellings at the Suffolk Police HQ site. In July 2018 there was no mention of this policy in the Local Plan, neither is there any mention of it in the adopted Local Plan (July 2013). What is the point of having a Neighbourhood Plan if it is going to be ignored?

In the previous version of the Local Plan (First Draft, July 2018), it states: *“The Brightwell Lakes site is significant in terms of infrastructure provision and housing delivery and therefore it is not currently considered appropriate to direct any further large scale development to this part of the District” (§3.19)* and this is confirmed in Table 3.3 (§3.35). The allocation for the ‘Communities Neighbouring Ipswich’ has now been increased, **without consultation**, by 300 dwellings, 15% of the current allocation of 2,000 for Brightwell Lakes. As well as being unlawful, Policy SCLP12.25 clearly violates the requirements of the NPPF (quoted above), so fails the soundness criterion **(d) Consistent with national policy**

The NPPF states:

*“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

*a) the potential impacts of development on transport networks can be addressed” (NPPF, §102)*

There is no evidence that this has happened. In fact, since the Transport Assessment<sup>2</sup> makes no reference to this development, it is clear that the potential transport impacts of SCLP12.25 have not been addressed. SCLP12.25 is therefore inconsistent with the NPPF and violates the soundness criterion **(d) Consistent with national policy**

## 8. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound:

<sup>2</sup> Local Plan Modelling For Babergh & Mid Suffolk, Ipswich And Suffolk Coastal Forecasting Report – Volume 2: Suffolk Coastal and Ipswich Preferred Option, Jan. 2019

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

This allocation should be removed from the plan, in accordance with the statement in §3.19 of the Local Plan (First Draft, July 2018) quoted above (“it is not currently considered appropriate to direct any further large scale development to this part of the District”) (§3.19).

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**12. Date of Representation and signature:**

<b>Date</b> 22 <sup>nd</sup> February 2019	<b>Signature</b> Rebecca Todd
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**Data protection**

The information you have supplied is being collected in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. By returning this form you consent to Suffolk Coastal District Council holding and using your information in this way.

By responding to this consultation you are accepting that your name and response will be available for public inspection and published on line in accordance with the Act stated above. However, personal/email addresses, and telephone numbers will not be published.

After the end of the representations period, the Council will submit all representations received to the Secretary of State in a secure manner, this will include any personal data you have supplied.

Data will be processed and held in accordance with the Data Protection Act 1998 (and any updates). Data will be retained securely until the Local Plan is superseded or by the end of the plan period (April 2036) whichever is the earlier date.

Further information about data protection can be found on the East Suffolk website

<http://www.eastsuffolk.gov.uk/yourcouncil/access-to-information/data-protection-act/>