

**SUFFOLK COASTAL DISTRICT COUNCIL**  
**LOCAL PLAN REGULATION 19 CONSULTATION**



Response by  
**Fair Play for Felixstowe**

prepared by  
***Green Balance***



February 2019

*Cover image:* Part of the proposed North Felixstowe Garden Neighbourhood allocation enclosed by Gulpher Road (identified by houses). This is in the central north area of the site looking NE along the footpath from The Grove wood.

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## SUMMARY OF OBJECTIONS ON SOUNDNESS BY *FAIR PLAY FOR FELIXSTOWE*

- 1) The dwelling requirement in Policy SCLP3.1 *Strategy for Growth in Suffolk Coastal District* is too high and the means of meeting needs methodologically incorrect:
  - it should be based on 2014 household projections rather than those from 2016, and is unsound because it is not consistent with national policy;
  - the calculation of residual housing need in Table 3.2, which should be a policy in its own right, should make an allowance for provision on windfall sites: the omission means that the Plan is unsound because it is not justified;
  - particularly with reduced requirements for land supply to meet needs, the buffer for non-delivery is over-stated and should be reduced: as proposed the Plan is unsound because it is not justified.
  
- 2) The distribution of housing around the district should be a policy in its own right rather than in Table 3.3 following Policy SCLP3.1 *Strategy for Growth in Suffolk Coastal District*. The Plan provides a wholly inadequate explanation for the proportion of dwelling supply to be met on the Felixstowe peninsula, and is therefore unsound because it is not justified.
  
- 3) Policy SCLP12.3 *North Felixstowe Garden Neighbourhood* is unimplementable and therefore unsound because it will not be effective. Numerous matters all need to be resolved now, within the Local Plan, and not left for tackling at a future date:
  - The inability of a masterplan to secure comprehensive planning of the area means that Policy SCLP12.3 is unsound because it will not be effective.
  - There is no evidence that suitable highways solutions can be found for the Garden Neighbourhood, whether in terms of distributing traffic through the site, identifying suitable accesses onto existing major roads, or specifying the costs and who would pay for them. For want of evidence of highways feasibility, we consider that the Plan is unsound because it would not be effective.
  - Insufficient attention has been paid to integrating access for pedestrians and cyclists from the Garden Neighbourhood into the rest of Felixstowe, and the worthy aspirations in the Plan are unimplementable at present: the Plan is therefore unsound because it will not be effective.
  - Insufficient steps have been taken to ensure that Gulpher Road is not used for vehicular access, which is a text aspiration only. Negotiations to resolve this are likely to be compromised unless the aspiration is written into Policy SCLP12.3. Until then the Plan is unsound because it would not be effective.
  - Policy SCLP12.3 and its supporting documents contain many details aimed at protecting the environmental qualities of the North Felixstowe site and their enjoyment by future residents. However, the policy is silent on whether and where a further 1,440 dwellings could be accommodated, the distribution of dwelling heights and densities around the allocation, and the consequential effects and compromises involved. The evidence available suggests that the aspirations of the Policy will not in practice be implementable, and therefore that the Plan is unsound because it would not be effective.
  - The Local Plan needs to be far clearer where the Suitable Alternative Natural Greenspace to divert recreational pressures from the Deben Estuary SPA will be

located and what the consequences are for the rest of the masterplan of providing this. Until then we consider that the Plan is unsound because it would not be effective.

- Only with an Infrastructure Delivery Plan and a Viability Assessment will the first steps be in place to provide reassurance that the North Felixstowe allocation is feasible. The indications at present are that the many aspirations in the Policy, taken as a whole, are not deliverable. A decision would then need to be taken on whether to compromise some of the aspirations (with the attendant risks) or abandon the Garden Neighbourhood altogether.

4) Policy SCLP12.4 *Land North of Conway Close and Swallow Close, Felixstowe* is undeliverable in a manner compatible with Policy SCLP12.3, and therefore the Plan is unsound because it would not be effective.

## **1 Purpose of this statement**

1.1 Green Balance has been asked by Fair Play for Felixstowe to prepare a response to Suffolk Coastal District Council's Local Plan Regulation 19 Consultation. In particular we have been asked to advise on matters of soundness relating to:

- (1) The overall provision of dwellings required in the District; and
- (2) The proposed allocation of the North Felixstowe Garden Neighbourhood.

## **2 Dwelling provision required in the District**

2.1 Policy SCLP3.1 Strategy for Growth in Suffolk Coastal District sets out the district-wide dwelling requirement for the 18 years 2018-2036. This is 582 new dwellings per annum (at least 10,476 over the period). We consider this policy unsound, for a variety of reasons.

### **Non-conformity with the standard method for calculating local housing need**

2.2 Since the Regulation 19 Consultation Local Plan was issued, the Government has changed its policy on the method of calculating local housing need, according to its 'standard method'. Paragraph 60 of the National Planning Policy Framework states that the Government's 'standard method' must be used, as set out in Planning Practice Guidance. (This paragraph was unchanged in the revision to the NPPF on 19<sup>th</sup> February 2019.) The relevant PPG, on 'Housing and economic needs assessment', was revised on 20<sup>th</sup> February 2019. The key change, in paragraphs 004 and 005, was to require the use of the 2014-based sub-national household projections rather than the 2016-based ones in setting the baseline for local housing needs assessment.

2.3 Advice on the 'Strategic Housing Market Assessment' (SHMA) prepared for the Council by Peter Brett Associates foresaw the possibility of this happening, as it was proposed in a MHCLG consultation (which closed on 7<sup>th</sup> December 2018). PBA therefore provided two alternative sets of calculations, using the 2014-based figures and the 2016-

based figures. The Regulation 19 Consultation Plan used the 2016-based figures, but these now need to be revised to use the 2014-based figures, helpfully available from PBA. As a result, the assessed requirement in the SHMA drops from 582 dwellings per annum to 515 (i.e. from 10,476 to 9,270 2018-26). This is a drop of 1,206 dwellings.

2.4 As a starting point for assessment, the district-wide housing requirement should be brought into line with these figures in Policy SCLP3.1 and elsewhere. As proposed, the Plan is unsound because it is not consistent with national policy.

#### Residual housing requirements

2.5 We found it surprising that there is no policy in the Plan on the residual housing needs which should be met, once allowance has been made for existing supply commitments. Instead, the proposals are set out in Table 3.2 on page 38. We set out below why we consider this calculation is methodologically incorrect and therefore unsound because it is not justified. This is separate from reducing the starting point for residual need by 1,206 dwellings from the 3,478 in the table to 2,272 dwellings (in line with paragraph 2.3 above).

2.6 We are particularly concerned by the absence of any allowance for ‘windfall’ housing development, i.e. arising unexpectedly on land that is not allocated for housing. It is simply not practicable for local planning authorities to foresee the location of every dwelling that will receive planning permission and be built. The ‘Strategic Housing and Economic Land Availability Assessment’ (SHELAA) reports at paragraph 2.33 that windfall supply has averaged 97 dwellings annually across the district over the last five years (2013/14-2017/18), but then remarkably it assumes that the rate will halve to just 50 annually from 2020/21. It is right to avoid double-counting of existing planning permissions, and we agree that the next two years of supply should be treated as nil on this basis. However, we see no reason not to continue to expect new windfalls to continue at recent historic rates after that two-year gap.

2.7 As an example on windfall sites, the assumption in the Plan is that, in all the years to 2036, Felixstowe will experience the building of not a single house other than on the four allocated sites of SCLP12.3, SCLP12.4, SCLP12.5, and SCLP12.6. This is of course fanciful in a town of 24,000 people and 11,300 dwellings at present. Making a proper districtwide allowance (incl. neglecting the first two of the 18 years) would offer 16 years at 97dpa, or 1,552. We see no justification for assuming that windfall supplies will halve in number, but if the Council’s estimated supply 50dpa over 16 years were used, then supply allowance would still be 800 dwellings. This has been completely omitted from the Local Plan (paragraph 3.38). Windfall supplies would reduce the residual requirement for which fresh land would have to be supplied from 2,272 dwellings to either 720 or 1,472 dwellings according to the basis used.

2.8 There is a further related issue on which the evidence base for the Local Plan is silent, which needs to be resolved. Paragraph 2.33 of the SHELAA states that *“To avoid double counting with sites identified as potential in the SHELAA, only average delivery rates of ~~for~~ windfall sites below 0.2ha have been considered. Over the past 5 years (2013/14 –*

2017/18) this has been an average of 97 per annum.” While the figures are covered by our comments above, this raises the issue of windfall supplies on sites larger than 0.2ha. These appear to have been omitted completely from any assessment. SCDC was unable to provide us with a spreadsheet of annual windfall supply split by sites above and below 0.2ha (let alone split by Parish): the information was simply not available. We consider it important that an allowance is made for housing provision on large windfall sites and not just on small ones. Large windfall sites occur more irregularly, but they can supply substantial numbers of dwellings. It would be quite wrong to claim that all potential large sites have been identified and allocated in the Plan: no Plan can predict when, say, another pub with a large garden will become available, an established business move away to grow or to cease altogether, a police station (as happened at Martlesham) or large retail store (perhaps Felixstowe Marks & Spencer) become surplus, or bus companies merge to release a depot. It is important that a reasonable allowance is therefore made for large windfall sites, both in the Local Plan and in the calculation of the 5-year housing land supply. This must as usual follow policy in the NPPF at paragraph 70 that “*Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.*” This may well err on the side of caution compared with historic windfall supply rates on larger sites, but should still be greater than nil.

2.9 There are both policy and practical reasons why an allowance should be made for windfall supplies in the Local Plan estimate of residual housing requirements. In policy terms, the NPPF (19 February 2019) is clear at paragraph 68 that “*To promote the development of a good mix of sites, local planning authorities should... (c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes*” (emphasis added). We strongly support urban land recycling in Felixstowe and elsewhere in the District in preference to taking greenfield sites.

2.10 In practical terms, it is important that calculations of the 5-year housing land supply in the District are carried out on a compatible basis with the policy established in the Local Plan. Appendix D of the Regulation 19 Consultation Plan shows on page 496 a graphic with the housing supply trajectory for the District which includes (in orange) an allowance for windfall sites. For compatibility, the residual housing requirement should also include an allowance for windfalls. Similarly, the Council’s most recent annual ‘Housing Land Supply Assessment’, published in June 2018 for the period 1<sup>st</sup> April 2018 – 31<sup>st</sup> March 2023, does include an allowance for supplies on windfall sites (which it does each year). This uses the Council’s usual method of accepting an estimate of 50 dwellings per annum except in the first two years (see paragraph 2, Table 4 and Table 6). This Assessment has been broadly accepted in the most recent planning appeal decision deciding on the Council’s 5-year land supply. The Council’s webpage on Housing Land Supply Assessment begins by referring to Appeal 3160194 (Land east of Bell Lane, Kesgrave) as the latest basis for calculating the 5-year land supply. The ‘2018 Housing Land Supply Assessment’ is noted in passing by the Inspector at that appeal in his paragraph 66 without any adverse comment from him.

2.11 We consider it reasonable to assume that windfall supplies of 50 dwellings per annum are already built into the policy basis for estimating the 5-year housing land supply in Suffolk Coastal. That should apply to Local Plan policy too. We consider the omission of

windfall sites from the calculation of residual housing supply in Table 3.2 means that the Plan is unsound because it is not justified. If the Local Plan were to be changed to include an allowance for 97 windfall dwellings per annum, as seems to us reasonable, then the annual Housing Land Supply Assessment should also be amended accordingly. On this basis, the residual housing land supply to 2036 would be 720 dwellings, far below the Regulation 19 Consultation Plan figure of 3,478. That is without any allowance for windfall housing supplies on sites larger than 0.2ha.

2.12 The effect of making the changes above to the residual housing requirement in Suffolk Coastal District in the Local Plan would clearly be profound. There would be no need, after all, to find sites for the supply of around 2,750 dwellings. This would remove the claimed need for both the Garden Neighbourhoods at North Felixstowe (1,440) and at Saxmundham (800), and still provide freedom to remove land for 500 houses elsewhere – presumably by prioritising deletion of those on greenfield sites. This would be a major change to the Local Plan in its Regulation 19 Consultation version, and remove a large amount of public concern about poorly thought-out proposals. Until allocations are reduced by 2,750 dwellings we consider the Plan is unsound because it is not justified.

#### Over-allocation of land for housing

2.13 Table 3.3 of the Local Plan shows that land has been identified for 4,370 dwellings. This compares with a residual need calculated in Table 3.2 for 3,478 dwellings. The Plan accepts in paragraph 3.39 that this is an oversupply of approximately 890 dwellings (8.5% of the total requirement of 10,476 in the period 2018-36 identified in Policy SCLP3.1). We have some sympathy with the need to make an allowance for dwellings which might not come forward on allocated (or permitted) sites – the reason given in paragraph 3.39. However, in our view, the scale of oversupply is far too large. If, as we propose above, the residual housing need is reduced from 3,478 to 720, and allocations are therefore reduced by 2,750, there is simply no need to make an allowance against the non-delivery of those 2,750 dwellings. They were not required in the first place, so there is no point in offering alternative sites for as many as 890 dwellings as well. A buffer could be appropriate for the non-delivery of other sites already permitted or allocated in the current Local Plan or Neighbourhood Plans, but not on the scale of 890 dwellings. On a pro-rata basis, an 8.5% buffer against the existing commitments for 6,998 dwellings (Table 3.2) would be 595 dwellings. A buffer of 595 might therefore be appropriate rather than 890. This is a reduction in residual housing need of 295 dwellings.

2.14 We therefore consider that the residual housing need should be further reduced by 295 dwellings. In paragraph 2.11 above we argued for a figure of 720 dwellings, so this can now be reduced to 425. Allocating land for just 425 dwellings over the period 2018 to 2036 demonstrates just how much land Suffolk Coastal DC has already allocated and permitted for housing (together with appeals granted) in its quest for reasonable growth. Our conclusion is that this is the residual dwelling supply for which fresh allocations should be made: these can clearly be provided on brownfield sites. We conclude that the Plan greatly over-allocates land for housing to act as a buffer against non-delivery of allocated sites, because a proportion of those allocated sites is not needed. The over-allocation of buffer sites means that the Plan is unsound because it is not justified.

### **3 Proposed North Felixstowe Garden Neighbourhood allocation**

#### Background to the allocation

3.1 Suffolk Coastal DC has historically aimed to protect the area covered by this allocation from built development. 'A local strategy for Felixstowe Peninsula', prepared by David Lock Associates and others for a consortium of public sector bodies in April 2006, reviewed the contribution to the town made by north Felixstowe, north of the A14 and A154 Candlet Road (amongst other sites). It commented: "*land to the north of Felixstowe (including land north of Candlet Road, Grove Road and Links Avenue) may be considered to be a suitable location for development. However, after undertaking landscape analysis (as part of the site analysis process) the consultant team has concluded that the landscape character is of such quality and merit that consideration should be given to safeguard the area against development in perpetuity*" (paragraph 3.42, emphasis added). Its reasons for discounting the North Felixstowe site from future growth scenarios were given on page 57:

- *High quality landscape character – potential to create new country park or extension to AONB.*
- *Proximity to AONB.*
- *Potential to set a precedent for unlimited development north of A14/A154 roads, which currently define the northern boundary of the town."*

3.2 Appendix D to the consultants' report was on 'Specific landscape assessment comments for north Felixstowe'. This review offered two pages of emphatic argument for keeping the area much as it is. For example (with emphasis added):

#### ***"Town Identity, Setting & Approach***

- *The North Felixstowe rural landscape provides a high quality setting for, and approach to, Felixstowe. It makes the town special and is as important to its identity as the sea. It reinforces perceptions about the town's character and quality.....*

#### ***An alternative attraction for visitors***

- *It provides an extra attraction for holidaymakers – a different "countryside" experience as an alternative to the seaside, (possibly an unexploited marketing opportunity here – all year round walking, cycling, bird-watching, horse-riding, etc.). Development of the northern edge would seriously compromise what Felixstowe currently has to offer.*

#### ***Defines the town "edge"***

- *It effectively defines the edge by reinforcing the abrupt transition from countryside to town.*

#### ***A diverse landscape of great beauty, sensitive to intervention***

- *It consists of an unspoilt, richly diverse, "traditional" farmland landscape, including - flat/rolling/valley landform, open/exposed/aspects, enclosed/sheltered/intimate aspects, grazing/arable land, streams/village pond/reed-bed watercourses, wide aspect/expansive vistas, contained/inward looking landform, wide straight roads/winding country lanes, ancient woodland/new community plantations/*

*specimen trees, open fields/hedgerows, vernacular architecture/period cottages/ active farms/restored listed farm buildings etc.*

### **Relationship to AONB and Heritage Coast**

- *It is the interface between the town and an Area of Outstanding Natural Beauty and Heritage Coast and is visually sensitive to intervention. Because of the landform, development on the plateau sites in question would change the skyline from without the town. Instead, the AONB should be extended to embrace (at least some of) the sites in question."*

3.3 In addition to recommendations by David Lock Associates, the whole site is very high grade agricultural land with, approximately, the western third being Grade 1 farmland and the remainder Grade 2 farmland. This is all Best and Most Versatile Land where there is a presumption that lower grade land should be allocated instead. In terms of current national planning policy, NPPF footnote 53 states that "*Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality*". Choosing to allocate North Felixstowe would appear to us in breach of this policy, given that the Council has alternatives across the whole of the rest of the District to choose from.

3.4 In January 2017 Suffolk Coastal DC published its 'Felixstowe Peninsula Area Action Plan'. This made almost no reference to north Felixstowe, as no development was envisaged here.

3.5 The planning of the area changed drastically on 31<sup>st</sup> August 2017. The Secretary of State allowed Appeal 3138710 on land north of Candlet Road comprising 560 dwellings, local community centre, 60 bedroom extra-care home, 50 assisted living units and 2 small business units, with associated infrastructure. The dominant issue in the decision was the inability of the Council to demonstrate a 5-year housing land supply.

3.6 Regarding the qualities of the area, the Inspector commented: "*The strong physical and visual boundary of Candlet Road is an important part of the landscape character of the area. The countryside to the north makes a significant and positive contribution to the setting of the settlement. The appeal proposals would harmfully breach that boundary and provide no equivalent boundary between the built up area and the countryside. That would be harmful to the setting of Felixstowe/ Walton and would be in conflict with CS Policy SP15*" (paragraph 142). He continued: "*In terms of its visual impact, this is a large site that lies outside the settlement boundary for Felixstowe/ Walton. It is clear that the proposed development would substantially alter the character and the appearance of the site from being predominantly used for horse grazing and stabling into a predominantly residential use. That is an inevitable consequence of residential development in the countryside*" (paragraph 143). "*The development would result in considerable visual harm to the immediate area*" (paragraph 144).

3.7 Despite this, the identified harm to the countryside was found by the Inspector not to 'significantly and demonstrably outweigh the benefits', in the terms required by the NPPF. On this basis permission was granted. In our view, the case epitomises the serious

unintended consequences for the proper planning of real places arising from the draconian emphasis in Government policy on housing land supply on unallocated sites at the expense of other legitimate interests.

3.8 This decision appears to have prompted just the consequence David Lock Associates forewarned, with the *“Potential to set a precedent for unlimited development north of A14/A154 roads”*. This point was also raised by the Suffolk Coast and Heaths AONB Unit in response to consultation on the Candlet Road site application, who raised: *“The potential for a precedent to be set for further development proposals to the north of Candlet Road, further deteriorating the current buffer between the established settlement boundary and the AONB”*. Now, the allocation of the North Felixstowe Garden Neighbourhood Site in the Regulation 19 Consultation Local Plan extends as far north as the AONB boundary and would be 2.3km wide from west to east. The damage inflicted by that appeal decision is becoming apparent in an additional respect: the permitted site wholly splits the western end of the new allocation from the eastern end. This raises a highly significant problem in planning for the development of the Garden Neighbourhood as a whole. With the principle of protecting this fine countryside apparently lost, the proper planning of the whole area is now a key concern of Fair Play for Felixstowe – if it should proceed at all, given that our evidence on housing requirements and supply in section 2 above shows no need for it.

#### Securing a masterplan for North Felixstowe Garden Neighbourhood

3.9 The development of a successful Neighbourhood in North Felixstowe depends on a number of important features. At present we are not satisfied that any of these is anywhere near likely to be achieved based on the proposals in the Regulation 19 Consultation Plan. We are of the strong view that these matters all need to be resolved now, within the Local Plan, and not left for tackling at a future date, if the allocation is accepted in principle. After allocation there would be no remaining power of any consequence available to the District Council to enforce the proper planning of the Neighbourhood, and residents will be left with paper promises that are unimplementable. At present, we have no doubt whatever that Policy SCLP12.3 in the Regulation 19 Consultation Plan is unsound because it will not be effective. It will be undeliverable. The current Indicative Draft Masterplan is reproduced below as Figure 1.

3.10 The main features we expect to see – to be established now in the Local Plan and enforceable later – are as follows:

- (i) a Plan for the cohesive development of the entire allocation area as a single entity, including the land for which permission has already been granted in Appeal 3138710 and the land allocated for housing in Policy SCLP 12.4, not least to avoid piecemeal development with inadequate infrastructure overall;
- (ii) high quality road access available to the entire site;
- (iii) effective integration of the development into Felixstowe across the boundary posed by the A154 (on the west side) and Grove Road/Links Avenue (on the east side);



Figure 1 North Felixstowe Indicative Draft Masterplan (Local Plan Regulation 19 Consultation)

- (iv) protection of the rural qualities of the area on the fringes of the allocation site, particularly to retain the rural atmosphere of Gulpher Road and Ferry Road and their surroundings;
- (v) controls over design and layout which both add new quality to the area and severely limit damage to the setting of the AONB and to woodlands: the scheme’s design and layout should be led by a green infrastructure strategy and a recreational strategy;
- (vi) identified provision of Suitable Alternative Natural Greenspace (SANG), as required by the Habitats Regulations Assessment, in view of the pressure that would otherwise exist for recreational pressure generated by the Neighbourhood on the Deben Estuary Special Protection Area/Ramsar site.
- (vii) at the completion of the above, an Infrastructure Delivery Plan followed by a Viability Assessment, to demonstrate that the masterplan is capable of delivery.

3.11 Policy SCLP12.3 should not be seen in isolation. The Candlett Road permission for 560 dwellings sits within the policy area. For convenience, the Candlett Road Indicative Masterplan is provided in Figure 2 below.



Figure 2 Candle Road Indicative Masterplan (Outline Planning Permission)

3.12 In addition, a housing allocation is also made through Policy SCLP12.4 for 'Land north of Conway Close and Swallow Close, Felixstowe' which is immediately adjacent to the eastern edge of the Garden Neighbourhood. This is a continuation of Policy FPP5 in the 'Felixstowe Peninsula Area Action Plan' and, despite its drawbacks, therefore has some momentum behind it. Policy SCLP12.4 provides for a level of integration into the Garden Neighbourhood, notably:

*"(d) Highway design which provides for appropriate vehicular access to the Garden Neighbourhood";* and

*"(k) Green infrastructure to be complementary to the green infrastructure provided at Felixstowe Garden Neighbourhood".*

We therefore consider that in at least some respects the planning of the SCLP12.4 site should be co-ordinated with the Garden Neighbourhood.

3.13 The Regulation 19 Consultation Local Plan has in our view failed to grapple with the achievement in practice of any of our key issues above or offer effective integration with the existing Candle Road permission or Policy SCLP12.4 housing allocation. The issues are examined in more depth below. Each section begins with a summary of the commitments in Policy SCLP12.3 and supporting statements in the reasoned justification text.

### Cohesive development of the entire allocation

3.14 Policy SCLP12.3 seeks *"a comprehensive leisure led development"*, and states *"This new development will be delivered through a master plan approach brought forward through landowner collaboration and community engagement."* A range of infrastructure will be required to support this, including:

*“(a) A new leisure centre in a location which is easily accessible for the existing community”;*

*“(b) Provision of 630 primary school spaces and early years provision”;*

*“(l) Community Hub comprising a variety of services and facilities [which could include convenience store, shops, meeting places, education facilities, care facilities and medical facilities] to be created in accessible locations”;*

*“(p) Employment land for high quality non-port related small business units”.*

The policy also states that *“The necessary offsite infrastructure requirements, including health provision and police facilities will be required through developer contributions....”;*

*“(u) Up to 2,000 dwellings (including 560 with outline planning permission [the ‘Candlet Road’ site], as shown on the Policies Map)....”.*

This is supported by paragraphs 12.39-45 and 12.56-59.

3.15 Paragraph 12.31 states that *“The master planning approach will ensure that the Candlet Road site is an integral part of the development.”* Paragraph 12.32 states that *“A master plan approach covering the whole site will be used to inform individual planning applications for parcels of land as they come forward over the plan period.”*

3.16 The principle of a master plan to enable the effective planning as a single entity of the entire area covered of the proposed Garden Neighbourhood is a good one. However, we cannot understand how the Council has any chance of achieving this. That is primarily due to the Candlet Road permission which divides the remaining areas into two separate units without any connection between them. The Garden Neighbourhood appears to be a three-part development, not a unified whole.

3.17 The starting point is straight-forward. If the promoters of the Candlet Road site bring forward detailed proposals conforming with their outline permission and indicative masterplan (Figure 2), the Council will struggle to resist permitting this or to amend it significantly. This will oblige the Council to plan separately for the eastern and western sectors of the Garden Neighbourhood, either side of it, unless the promoters of the Candlet Road scheme consider it in their own interests to adjust the scheme for which they have outline permission. Quite simply, they can dictate the terms for any Garden Neighbourhood-wide planning, and it is not clear to us why they might wish to change their plans significantly.

3.18 A critical part of planning for the entire area covered by Policy SCLP12.3 is that infrastructure provision can be integrated across the entire scheme for the benefit of the whole. The policy lists requirements and the key ones are reproduced in paragraph 3.14 above. The intention is clearly that the dwellings sold will fund the infrastructure, and that land values will reflect the need for this when individual parts of the site are brought forward. We consider the reality is that SCLP12.3 contains a wish-list rather than an enforceable package. The planning permission for the Candlet Road site, however, places few obligations on the development of that site beyond those needed to enable the scheme to function at a basic level. Aside from Conditions 23 and 24 on archaeology, the primary regulation appears to be a Unilateral Undertaking which covers contributions to affordable housing, primary education, pre-school places, libraries, play space, sports space and open space. The permission places no obligation on that development to contribute to other wider benefits not already specified in the indicative masterplan (containing notably a

community centre and care home). This means that the 560 dwellings on the Candlet Road site will make nil contributions to:

- the leisure centre; or
- a community hub with wide-ranging services for the whole area; or
- small business units beyond the two committed on the Candlet Road site; or
- off-site infrastructure such as health and police facilities.

The remaining 1,440 dwellings planned must therefore absorb the cost of providing these, and perhaps other facilities, for the benefit of occupants of all 2,000 dwellings.

3.19 The Candlet Road site has been planned around a signalled access near its south west end, with housing, open space and other development distributed around the site. There is simply no vehicular way through this site for future residents of the Garden Neighbourhood to move either between the proposed new western and eastern sectors, or between either of these and the Candlet Road part of the Neighbourhood. This is not integrated planning of the whole, but division of the area into three entirely separate functional areas. There is no evidence whatever that the council will be able to achieve the central objective of the Garden Neighbourhood that it will be planned as a whole with the Candlet Road site an integral part of the development. Proper planning of the entire Garden Neighbourhood would require the outline planning permission on the Candlet Road site to be replaced by a revised permission working to a new masterplan. That does not seem to be in prospect. The inability of a masterplan to secure comprehensive planning of the area means that Policy SCLP12.3 is unsound because it will not be effective.

#### High quality road access to the entire site

3.20 Policy SCLP12.3 states that the Master Plan should include “(m) Provision of new vehicular access points off Candlet Road and/or improvements to existing accesses supported by further access for pedestrian and cycle traffic in other locations.” Also “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.”

3.21 Paragraph 12.48 explains: “Currently Candlet Road is the northern boundary of Felixstowe and as such is anticipated to provide the primary vehicular access points into the areas to be master planned. It is anticipated that a site of this size will require multiple access point for vehicular traffic as well as further links provided solely for walking and cycling. Opportunities to create a network of vehicular and non-vehicular (pedestrian and cycling) links throughout the Garden Neighbourhood are to be explored to provide interconnectivity and free movement through the site and beyond. New vehicular junctions will need to be established to provide access from Candlet Road and ensure that Gulpher Road which is a designated ‘Quiet Lane’ is not used for vehicular access. The Council will work closely with landowners, Suffolk County Council and Highways England to establish the most appropriate highway access points. In terms of the wider highways network, transport modelling has identified potential issues at Dockspur roundabout and the A14 corridor and developers will be expected to work with Highways England to ensure that any necessary works are provided for. Transport modelling has also identified potential capacity issues at

*junctions on Garrison Lane. A Transport Assessment will need to consider the specific impacts and mitigation further."*

3.22 Four critical highways issues are completely unresolved at present:

- (a) whether there should be separate accesses for each of the three main parts of the Garden Neighbourhood and, if so, where these would be and if they would be realistic;
- (b) whether there will be preferred accesses serving the whole Garden Neighbourhood and, if so, where these would be and if they would be realistic;
- (c) whether there should be a spine road or other network serving the whole area;
- (d) whether additional vehicles associated with the development can be absorbed (especially onto Candlet Road) and if so where the access(es) should be.

3.23 The outline permission for the Candlet Road site has been granted its own new access onto Candlet Road, and this defines the means of access to this part of the area covered by Policy SCLP12.3. The indicative master plan in the Regulation 19 Consultation Plan shows three additional accesses: another one onto Candlet Road serving the western section of the area, and two serving the eastern section (one via the road serving the Grove Medical Centre onto a roundabout with five arms, and the other giving access into the Policy SCLP12.4 housing allocation site at the eastern extremity). The default option being suggested is that each of the three parts of the Garden Neighbourhood will be treated separately in access terms, and Policy SCLP12.3 does nothing to disavow that. However, each access option needs far more careful assessment and its feasibility established now. There is a risk that all three options will prove impracticable.

3.24 The access onto Candlet Road proposed to serve the western section of the Garden Neighbourhood would be sited close to the A14/Candlet Road roundabout (Dockspur Roundabout). Its position on the Indicative Draft Masterplan suggests that this will involve a new northern arm onto the roundabout approved for the Walton Green North development on the south side of Candlet Road. As this would add additional traffic onto Candlet Road as well as that associated with the Candlet Road site for 560 dwellings, it is essential that highways modelling is carried out in advance to assess the capacity and safety implications. That will also mean taking a decision on the distribution of the additional 1,440 dwellings between the western and eastern sectors of the Neighbourhood. Paragraph 12.48 of the Plan already reports that *"In terms of the wider highways network, transport modelling has identified potential issues at Dockspur roundabout and the A14 corridor, and developers will be expected to work with Highways England to ensure that any necessary works are provided for."* The likelihood is therefore that, at the very least, there will be additional off-site costs facing the developers, or even outright restrictions. There may also be costs or limitations to resolve on access into Felixstowe due to the noted constraints on Garrison Lane (the A154 running south from the roundabout on Candlet Road). Final decisions on highways requirements and costs are needed now, so that the financial viability of the Garden Neighbourhood is clarified from the outset.

3.25 The Plan needs to resolve now whether the housing allocation north of Conway Close and Swallow Close is or is not to be treated as part of the Garden Neighbourhood. At present it is excluded, but Policy SCLP12.3 shows a vehicular link into it while Policy SCLP12.4(d) similarly identifies a road link into the Neighbourhood. That is not a tenable

option without further policy development work. When first proposed, the SCLP12.4 site was to be linked into Ferry Road, the main arm of which runs southwards into Felixstowe. If, however, that development is linked into the Garden Neighbourhood as proposed in SCLP12.4, it would provide a through-route for access to and from the Garden Neighbourhood via Ferry Road. We caution strongly against that: Ferry Road is a residential road with two primary schools not established to take the large volume of traffic serving the entire eastern (larger) section of the Garden Neighbourhood. The requirement should therefore be EITHER to prevent access onto Ferry Road from the SCLP12.4 allocation site, OR to prevent access between the Garden Neighbourhood and the SCLP12.4 allocation site. That is, respectively, integration or separation of the SCLP12.4 site. We consider it unacceptable for Policy SCLP12.4 and the Indicative Draft Masterplan for the site with Policy SCLP12.3 both to propose vehicular movement between these sites without a further decision on handling the consequences. We also note that, if for any reason the north-south arm of Ferry Road is closed, all traffic would make its way between the eastern sector of the Garden Neighbourhood and Felixstowe via the east-west arm of Ferry Road, which is a country lane running to the coast. That road is at points so narrow the even two cars cannot pass each other, and introducing any additional traffic on this road from allocated development should be rigorously avoided. We consider that, as proposed to be submitted, the Regulation 19 Consultation Plan is unsound because Policy SC12.4 is undeliverable in a manner compatible with Policy SCLP12.3, and therefore the Plan is unsound because it would not be effective.

3.26 We consider the proposed major access from the eastern sector of the Garden Neighbourhood onto the roundabout serving Grove Road, Links Avenue, Colneis Road, Beatrice Avenue, and the Grove Medical Centre to be unrealistic. This roundabout is wholly unsuitable for serving an additional 800-1,000 houses. An assessment of its feasibility is needed from the County Highways Authority (and no doubt Highways England too in view of the knock-on effects close-by to the west on the A14). If we make the assumption for the present that Candlet Road and the strategic highway network further west of the junction can cope with the extra traffic (yet to be determined), then we recommend that consideration is also given to providing this major access direct into the A154/Grove Road roundabout slightly to the west. That roundabout is larger and has only three significant arms, (the arm to the north being an informal local track serving the allotments). Access as a fully-developed northern arm has a greater chance of being acceptable in highways terms. That would require the felling of a road-width of trees planted quite recently, which would be a matter of regret. We note that access through either roundabout would be expected to increase traffic volumes in both directions on Garrison Lane, and that paragraph 12.48 of the Local Plan has already identified that *“Transport modelling has also identified potential capacity issues at junctions on Garrison Lane. A Transport Assessment will need to consider the specific impacts and mitigation further.”* Again, in addition to feasibility, the off-site highways improvements required and their cost need to be built into the Local Plan unequivocally.

3.27 The separate options for vehicular access to the Garden Neighbourhood should not be considered in isolation. If integrated planning of the whole site has any meaning, we would expect a road network to run through the entire area. Consideration should be given to a spine road giving primary access to the whole development. This could be linked into

the road system at the most advantageous – or least damaging – point. That would probably be onto Candlet Road, either where the Candlet Road site for 560 dwellings has its access or onto the roundabout already approved for the Walton Green North development, or as a new northern access point onto the Dockspur Roundabout. Subsidiary access could be achieved elsewhere, with the layout of the road network limiting traffic volumes there.

3.28 In addition to the point of major access for a spine road, consideration would have to be given to a route for this road, or for a more dispersed network, through the whole site. We find it extraordinary that none is proposed on the Indicative Draft Masterplan. Clearly the best arrangement would be to plan the whole Neighbourhood again from a greenfield site, and try to find ways of securing buy-in from the developers of the Candlet Road site. An alternative, but far less satisfactory, arrangement would be to insert a spine road around the northern edge of the Candlet Road site. This would take traffic through what would otherwise be part of the green infrastructure network, immediately north of ‘The Grove’ Community Woodland, and would bring intrusive development into the area of land which most needs to be kept free of development (see paragraph 3.36 below). This route would probably have the least cost of acquisition from the developers of the Candlet Road site.

3.29 The failure of the Regulation 19 Consultation Plan to address all these issues, let alone offer proposed solutions, with their costs, is very worrying. There is no evidence at all that suitable highways solutions can be found for the Garden Neighbourhood, whether in terms of distributing traffic through the site, identifying suitable accesses onto existing major roads, or specifying the costs and who would pay for them. For want of evidence of highways feasibility, we consider that the Plan is unsound because it would not be effective.

#### Integration of the development into Felixstowe

3.30 Policy SCLP12.3 states “*Critical to the success of this development will be the integration of the new Garden Neighbourhood with the existing community of Felixstowe and surrounding area...*”. This is supported particularly by paragraphs 12.46-47 and also by 12.48-52.

3.31 We support this aspiration. However, crossing the main roads to achieve access to Felixstowe will usually be difficult and unattractive, especially for pedestrians and cyclists:

- Candlet Road is a busy and dangerous road, where crossing would have to be limited to signalled sites: with a new set of traffic lights and a new roundabout indicated on this road to enable access and egress, it seems inevitable that further crossing points would be resisted by the highways authorities and that pedestrians would be confined to existing and planned crossings;
- Grove Road is also busy and would be difficult to cross safely because it is between two closely-spaced roundabouts; in any event, there is little scope for access to the town on the south side other than at the roundabouts themselves;
- Gulpher Road crosses Candlet Road by means of an underpass: this will not be available to vehicular traffic (other than in an emergency), but provides a good access into the town for pedestrians and cyclists; it could be improved by lighting and investment in design, but is attractive in principle;

- the other road bounding the Garden Neighbourhood, Links Avenue (a residential road which is not a through route), has extremely limited opportunities for passage into the Garden Neighbourhood – and anything would be confined to non-vehicular means.

3.32 In short, there appear to be no more options for vehicular access into the town other than the main access points already required, while pedestrian and cycle access into and out of the Garden Neighbourhood will be most unattractive, other than the existing underpass of Gulpher Road beneath Candlet Road. Making the development attractive to pedestrians and cyclists will therefore depend on more vigorous interventions in the operation of the highways, restricting speeds, imposing additional traffic lights, and giving greater priority to non-vehicular traffic. That would come at some cost to highway capacity affecting the major routes into and out of Felixstowe, itself creating tensions between legitimate competing interests. There is no evidence in the Local Plan that consideration has been given to any of this. The major decisions need to be taken before the Garden Neighbourhood site is allocated: unless that happens there will inevitably be considerable risk to pedestrians on a scale which could undermine interest in occupying north Felixstowe. We do not consider that sufficient attention has been paid to integrating access for pedestrians and cyclists from the Garden Neighbourhood into the rest of Felixstowe, and that the worthy aspirations in the Plan are unimplementable at present. On this basis we consider the Plan is unsound because it will not be effective.

#### Protection of the rural qualities of the site fringes

3.33 Paragraph 12.48 states that *“New vehicular junctions will need to be established to provide access from Candlet Road and ensure that Gulpher Road, which is a designated ‘Quiet Lane’, is not used for vehicular access.”*

3.34 We strongly support the aspiration that Gulpher Road should not be used for vehicular access, which should be written into Policy SCLP12.3. Unfortunately, we consider that insufficient steps have been taken to ensure this. For example, as drafted, the Plan would encourage residents (particularly those close to the eastern end of the area) to exit via the SCLP12.4 allocation site, turn left onto Ferry Road and immediately left onto Gulpher Road: that would give them access around the outside of most of the Garden Neighbourhood and allow exit into Felixstowe under Candlet Road. This would be attractive if, as we suspect, other means of exiting the eastern sector of the area would be inconvenient and highly congested. We also note that, if a spine road or other network is constructed for the whole site, there will have to be an additional crossing of Gulpher Road between Candlet Road and Candlet Track, probably immediately adjacent to the latter. It is important that such an intersection does not give any opportunity for vehicles on the spine road to enter Gulpher Road. We consider that these are matters which can be resolved by negotiation, but the only way to ensure that outcome is not compromised is by upgrading the text to a Policy. Unless this is done, the Plan would be unsound because it would not be effective.

## Design and layout controls based on the AONB, woodlands and green infrastructure

3.35 Policy SCLP12.3 states *“Critical to the success of this development will be... taking into account the location of the site adjacent to the Suffolk Coast and Heaths AONB and its setting.”* This is supported by paragraphs 12.35-36, 12.50-51 and 12.54. Also, the Policy states that the Master Plan should include:

*“(c) Protection of the Grove Woodland and Eastward Ho recreational areas along with appropriate green infrastructure provision to provide accessible natural green space and retention and enhancement of the natural features on the site such as trees, woodland and hedgerows to be incorporated into the layout of the development”;*

*“(d) Appropriate open space provision for both informal and formal recreational opportunities through retained space, re-provision, enhancement or new provision”;*

*“(e) Public rights of way on the site should be preserved and enhanced, and opportunities sought to maintain and provide access to the countryside”;*

*“(g) Biodiversity networks and habitats to be preserved and enhanced, including measures to enhance biodiversity within housing areas”.*

Paragraphs 12.35-36 support this policy but add little of substance.

3.36 We welcome this policy. One of the most strategically significant areas within the Garden Neighbourhood in environmental terms is the block of land, currently farmland, enclosed by Gulpher Road on the north side of the allocation, up to the AONB boundary. We are pleased to see that the Indicative Draft Masterplan identifies this as a block of greenspace. This will assist multiple objectives:

- The Suffolk Coast and Heaths AONB Unit commented on the proposal at Draft Local Plan stage: *“A significant green buffer should be provided between the northern edge of the proposed Garden Neighbourhood and the boundary of the AONB to help minimise landscape impacts but also to help conserve the AONB”.*
- This part of the site is the most visible from the AONB: in particular a footpath running NE from Gulpher Road outside the allocation area marks the boundary with the AONB (to the north) and there are views directly into this area from that footpath, with any development being extensively and highly visible (see Figure 3).



Figure 3 Panorama (about 90°) into the north of the Garden Neighbourhood, looking SW from the footpath immediately above Gulpher Road; land to the right (north) of the path is AONB.

- The northern boundary of the built-up area within the Neighbourhood would inevitably be ill-defined with just a field between the proposed housing and the

northern extent of Gulpher Road; this was a feature also of the northern boundary of the Candlet Road site (see the Inspector's report on that point at paragraph 141). Keeping this land open therefore provides an important buffer to the development.

- The Draft Indicative Masterplan shows that the principal axis of green infrastructure through the site passes across the entire north of the allocation site, including this area.
- The Plan's 'Heritage Impact Assessment' for the North Felixstowe Garden Neighbourhood (David Edleston, November 2018) says of the setting of Gulpher Hall: *"Gulpher Hall is set back from the road but can be glimpsed through the trees from the road, in views from the east and west and from within the proposed development site to the south..... The group is experienced in an open, gently undulating landscape of arable farmland which is subject to seasonal changes in appearance. This forms their setting to the north south and west, with Gulpher Lodge adjoining the eastern boundary and a few scattered dwellings along Gulpher Road to the east..... The group has long historic associations with the use of the surrounding farmland and this open setting which has remained relatively unchanged over time makes an important contribution to their significance"* (paragraph 6.10). Avoiding development in this area to the south of Gulpher Hall will therefore be important to protect its setting.

3.37 We are also pleased to see the Policy intention to protect The Grove woodland, Eastward Ho, and retention and enhancement of the natural features on the site such as trees, woodland and hedgerows. We also note that paragraph 12.51 provides that *"The master plan approach provides the opportunity to consider the enhancement and/or increased provision of allotments"*. Paragraph 12.35 also states that *"Integrating the provision of appropriate green infrastructure is a fundamental part of the creation of a new Garden Neighbourhood"* and that public rights of way will be retained.

3.38 The scope for built development will also be constrained by the need to protect the settings of other listed buildings in addition to Gulpher Hall. We welcome Policy SCLP12.3(h) on this. The Plan's 'Heritage Impact Assessment' identifies two buildings in particular which will be affected:

- *"Setting of Candlet Farmhouse lies off a track which forms the north western boundary of the site. It is in a secluded location surrounded by a tall, predominantly coniferous hedge, with the entrance being enclosed by a timber fence and gates and the farmhouse itself is not visible. There are however, glimpses of the outbuildings associated with the farm, which are close to the boundary, through the surrounding hedge. Reference to late 19th century OS maps show the group of buildings screened by a wooded area immediately to the east but an open aspect to the north, west and south. Open, arable farmland surrounds the group on all sides and forms the setting, with the only main change over time being the planting to the southern boundary which provides some degree of screening. The ability to experience glimpses of the group from the south is subject to some seasonal changes to the planted boundary. As the surrounding land is farmed, agricultural land, the setting of the buildings will also be subject to some to seasonal changes in character. Nevertheless, the group has important historic associations with the use of the surrounding land, with this*

open setting making a key contribution to their significance” (emphasis added), paragraph 6.10.

- “Setting of Park Farm Cottages: Park Farm Cottages sit in an open, undulating landscape, adjoining the north east boundary of the proposed development site with access off Hyem’s Lane, a track running south from Gulpher Road. There are views towards the cottages from and across the proposed development site to the west and south as well as views from the cottages into the site..... The 1881 OS maps shows the cottages and outbuildings referred to as Park Farm, surrounded by open farmland..... Park Farm Cottages and outbuildings have a long, historic relationship with the use of the surrounding farmland and the remaining open setting, with its seasonal changes in appearance, makes an important contribution to the significance of the group” (emphasis added), paragraph 6.11.

3.39 The welcome emphasis on a recreation and green infrastructure-led masterplan does raise the question of the sufficiency of the remaining land to accommodate 1,440 houses (outside the Candlet Road site) while also meeting all the other requirements of the Policy, notably: extensive arrangements for suitable water management (Policy SCLP12.3(j); (k) and (o)); a leisure centre (Policy SCLP12.3(a); integration of biodiversity within housing areas (Policy SCLP12.3(g)); and the provision of Suitable Alternative Natural Greenspace (Policy SCLP12.3(f) – and see paragraphs 3.41-44 below). We are concerned that to achieve this there is a real risk that densities and particularly building heights will rise, challenging the original environmental objectives. Paragraph 12.42 provides for “*some higher density residential areas*”, but the Plan needs to be much clearer from the outset what the limitations are which will be incorporated in the Masterplan.

3.40 Higher density development will need to be focused on the least sensitive locations. However, such locations are difficult to find in the north Felixstowe area. The ‘Settlement Sensitivity Assessment’ carried out by Alison Farmer Associates (July 2018) found as follows:

- between Hyem’s Lane and the urban edge (one of the areas picked out in the Indicative Draft Masterplan as likely to be developed, including with community facilities) “*Some limited residential development could be accommodated... although care would be needed to ensure a vegetated and indented urban edge. Building heights would also need to be kept low to ensure no visual intrusion into wider countryside and the Deben Estuary.*”
- the entire western sector of the Garden Neighbourhood would be affected by the finding that “*Land around the junction of Candlet Road and A14 is sensitive to development which appears visually prominent on this higher land and is likely to further undermine perceptions of separation between Felixstowe and Trimley St Mary.*”
- “*Where the topography is more varied and associated with small streams it is sensitive to development due to higher scenic value and potential to offer green corridors from the urban edge to the wider landscape.*” Fortunately, this area is marked on the Indicative Draft Masterplan as open space, though damage will be done within the Candlet Road site permitted area.
- “*The flatter elevated areas of land above the 20m contour and adjacent to the existing urban edge west of The Grove woodland are less sensitive to development.*”

This may be so, but the land in question is partly covered by allotments, which are not expected to be affected by development.

Overall, therefore, the scope for providing higher density development may well be limited. It is therefore essential that the Local Plan through Policy SCLP12.3 identifies far more precisely what densities can be achieved, where, and what the effects will be. At present the supporting evidence available suggests that the aspirations of the Policy will not in practice be implementable, and therefore that the Plan is unsound because it would not be effective.

### Suitable Alternative Natural Greenspace

3.41 Policy SCLP12.3 states that *“(f) Project level Habitats Regulations Assessment will be required, and requirements for Suitable Alternative Natural Greenspace to be provided.”* Paragraph 12.37 further states that SANG *“provide an alternative on-site recreational opportunity for walkers with or without dogs which reduces the visitor pressure on the European protected sites and address any likely adverse effects. The SANG requirements need to be central to the design and layout of the Garden Neighbourhood and provided in convenient locations which are easy to access. Walking routes which can utilise the existing network of public rights of way need to provide opportunity for a long and exhilarating circular walk as an alternative to the nearby estuary environments. The size of the SANG areas for the Garden Neighbourhood is to be informed by locally relevant information and further provision of natural green space throughout the master plan in accordance with the Habitats Regulations and the principles of Garden Cities. Development will also be expected to contribute to the Recreation Avoidance and Mitigation Strategy.”*

3.42 The ‘Habitats Regulations Assessment’ accompanying the Regulation 19 Consultation Plan (Footprint Ecology, December 2018) has provided more detail on what is required at the North Felixstowe Garden Neighbourhood. Paragraph 5.13 suggests *“the following key design considerations for the SANG to be a viable avoidance/mitigation measure at Felixstowe garden neighbourhood development:*

- *Close proximity of European sites indicates that the SANG needs to be locationally convenient and easy to access;*
- *Design needs to be dog walker focussed;*
- *Provision of long walking routes within the SANG and incorporating the wider footpath network to create long walks that do not include or draw people close to the estuaries\*;*
- *Walking routes need to feel like a long and exhilarating walk as an alternative to the estuaries.”*

\* *“Visitor survey work for the Deben, from the Felixstowe ferry survey point, identified that the median route length for walkers surveyed was 7km. The surveys revealed that walkers will walk from Felixstowe to the estuary by incorporating the wider footpath network through farmland to create a long circular walk. Dog walkers are a particularly important user group”* (paragraph 5.12).

3.43 Achieving this will clearly involve integration between provision of SANG within the allocated area and rights of way extending well beyond the site boundary. The principal challenge is to offer *“long walking routes within the SANG”* and then to make these *“feel like*

*a long and exhilarating walk as an alternative to the estuaries*". Pre-existing rights of way are unlikely to count as SANG (unless currently inaccessible), so, important though existing rights of way are, there will be a particular onus on the masterplan to find land within the allocation which offers long walking routes. The site is over 2km wide, so there is some prospect of this, but the implication is that a recreation-led masterplan will cause a substantial area within the allocation to be devoted to SANG. This may include previously identified green corridors, particularly the arc of greenspace across the whole of the northern side of the site, but is also likely to need a 'return route' further south to enable walkers to make a circular tour which is attractive as an alternative to walking to the Deben Estuary.

3.44 The Indicative Draft Masterplan is silent on the location of SANG, though the supporting text at paragraph 12.37 promises "*The size of the SANG areas for the Garden Neighbourhood is to be informed by locally relevant information and further provision of natural green space throughout the master plan in accordance with the Habitats Regulations and the principles of Garden Cities.*" There is clearly an acceptance here that extra space for SANG may well be needed. What is absent is any indication of the effect of land-take on the scope for housing development and other urban provision. Once again, we are concerned that a good aspiration may founder on the practicalities and competing priorities of providing an extra 1,440 dwellings. The Local Plan needs to be far clearer where the SANG will be located and what the consequences are for the rest of the masterplan of providing this. Until then we consider that the Plan is unsound because it would not be effective.

#### Infrastructure Delivery Plan and Viability Assessment.

3.45 The Regulation 19 Consultation Plan is so far from providing reassurance that it is deliverable that additional steps should be added into the process (as other Local Plans normally do). First, the Council must decide what infrastructure is needed to achieve the objectives for the North Felixstowe Garden Neighbourhood: it is remarkable that this is not yet available. Second, this needs to be priced and a timeline for its provision established by those responsible for installing it: that is an Infrastructure Delivery Plan. The priced proposals then need to be assessed for their deliverability, bearing in mind the return on the provision of land expected by the landowners, the income from dwellings to be sold, the cost of providing the infrastructure required (in its widest sense), and the contingencies that should be allowed-for. Only then will it be practicable to establish whether the proposals in Policy SCLP12.3 are viable: that is the task of a Viability Assessment. The indications to us at present are that the many aspirations in the Policy, taken as a whole, are not deliverable. A decision would then need to be taken on whether to compromise some of the aspirations (with the attendant risks) or abandon the Garden Neighbourhood altogether.

3.46 Taking these concerns as a whole, we argue strongly that in its current form, particularly Policy SCLP12.3, the Plan is undeliverable and therefore unsound because it will not be effective.

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