



9 am to 4 pm Mondays to Fridays

East Suffolk Council
Planning Policy & Delivery Team
Riverside
4 Canning Road
Lowestoft
Suffolk
NR33 0EQ

08 July 2020

Suffolk Coastal Local Plan: Main Modifications Consultation

This matter was considered at a meeting of the Council's Planning and Environment Committee on Wednesday 1st July 2020. The Committee has delegated powers to make comments and representations on all planning matters on behalf of Felixstowe Town Council.

Further to its responses to the earlier Issues and Options, First Draft and Final Draft stages of the Suffolk Coastal Local Plan consultation, the Town Council submits the following comments with reference to the Schedule of Proposed Main Modifications document:

Ref	Page of Final Draft Local Plan	Policy / Paragraph of Final Draft Local Plan
MM15	75	After Paragraph 4.62

Proposed Main Modification:

Add new paragraph after paragraph 4.62 to read:

In primary shopping areas, the policy aims to ensure a dominant retail appearance which supports high levels of footfall. As such the policy restricts proposals which would undermine this approach and result in concentrations of non A1 uses. In coming to a view as to whether a proposal would result in a concentration of non A1 uses, using Table 4.1 as a baseline, the Council will have regard to the total number and proportion of different use classes along the immediate frontage and the continuity of non A1 uses.

FTC Comment:

We request a change to the wording as follows:

In primary shopping areas, the policy aims to ensure a **vibrant town centre** which supports high levels of footfall. As such the policy restricts proposals which would undermine this approach and result in **inappropriate** concentrations of non A1 uses. In coming to a view as to whether a proposal would result in **an inappropriate** concentration of non A1 uses, using Table 4.1 as a baseline, the Council will have regard to the total number and proportion of different use classes along the immediate frontage and the continuity of non A1 uses. **It is understood that retail**

is rapidly changing, requiring a flexible approach which recognises local circumstances.

Ref	Page of Final Draft Local Plan	Policy / Paragraph of Final Draft Local Plan
MM20	101	Policy SCLP5.12

Proposed Main Modification:

Change to wording of Policy SCLP5.12: Houses in Multiple Occupation:

b) Provision can be made for sufficient parking **and where the dwelling is, or can be made to be, accessible to public transport services and main employment and service centres on foot and by cycle; and**, ~~or the dwelling is served by good public transport or walking/cycling links which connect the dwelling to main employment and service centres; and~~

FTC Comment:

We are concerned that the requirement for both sufficient parking *and* access to public transport services on foot and by cycle could be overly restrictive.

Ref	Page of Final Draft Local Plan	Policy / Paragraph of Final Draft Local Plan
MM49	183 and various other pages	Paragraphs 11.45, 11.46 and Policy SCLP11.9 and various

Proposed Main Modification:

Delete Policy SCLP11.9: Areas to be Protected from Development and supporting text.

FTC Comment:

Felixstowe Town Council objects to the proposed removal of Policy SCLP11.9. This policy has specific purpose in protecting areas from development due to their character, setting and contribution to their settlements. This policy makes an important contribution to development management and feeds into other policies in the Local Plan. We do not feel it is sufficient to rely on other policies in the Plan for this purpose. This policy has been valued and widely used throughout the life of at least three generations of the Suffolk Coastal Local Plan.

Ref	Page of Final Draft Local Plan	Policy / Paragraph of Final Draft Local Plan
MM51	198	Policy SCLP12.2

Proposed Main Modification:

Proposed addition of h):

h) Opportunities for sustainable forms of transport will be enhanced, and the cumulative impact of new developments will not create severe impacts on the existing transport network;

FTC Comment:

We request a change to the wording as follows:

h) Opportunities for sustainable forms of transport will be enhanced, and the cumulative impact of new developments will not create ~~severe~~ **unacceptable** impacts on the existing transport network;

Ref	Page of Final Draft Local Plan	Policy / Paragraph of Final Draft Local Plan
MM52	206-207	Policy SCLP12.3

Proposed Main Modification:

Change of wording:

The necessary off-site infrastructure requirements, including health provision and police facilities will be required through developer contributions. ~~and water recycling upgrades undertaken by Anglian Water through the Asset Management Plan.~~

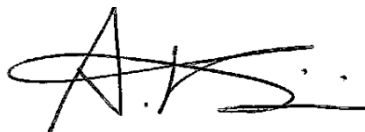
Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity will be required, including, but not limited to, water recycling upgrades.

FTC Comment:

We request a change to the wording as follows:

The necessary off-site infrastructure requirements, including health provision and police facilities will be required through developer contributions. Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity will be required, including, but not limited to, water recycling upgrades **opportunities**.

Yours sincerely



Ash Tadjrishi
Town Clerk
Felixstowe Town Council