Additional Comment by Fair Play for Felixstowe

Hearing document H20 East Suffolk Housing Land Supply Statement and Appendices

Fair Play for Felixstowe has reviewed this document in the context of responses by the Council (ESDC) at the earlier hearings and comments as follows.

1. The document (H20) calculates the 5-year housing land supply target as 2,846. It then goes on to calculate that the supply assessment is 4,001. Therefore the document identifies an excess of predicted supply, above target, of 1,155 (including a 5% buffer).
2. The windfall allowance in the Council’s calculations is, as others and we have noted, well below historical levels, further compounding the excess of supply over demand.

We believe that this impacts, and adds weight to, arguments that we have previously presented regarding the necessity for, and deliverability of, the proposed development of the North Felixstowe Garden Neighbourhood (SCLP 12.3).

We have previously made a strong case that it is highly unlikely that the proposed “master-planning” approach for North Felixstowe Garden Neighbourhood, whilst laudable in theory, will be deliverable, because SCLP 12.3 contains too many requirements that are mutually exclusive and hence purely aspirational, particularly on a site that is already split into three by an existing outline planning approval. This was further evidenced in the hearings when it became clear, for example, that the council is currently unable to determine how appropriate vehicular access infrastructure might be provided without contravening various other policy requirements, and is at odds with the Town Council over the provision of a spine road.

One of the key constraints around vehicular access arises because an adjacent site – SCLP 12.4 – has been included in the 5 year housing land supply calculations (H20). In the hearings we made a strong verbal case it makes no sense to exclude SCLP 12.4 from the SCLP 12.3 master-planning, as this is just compounding the council’s problems over contiguous developments. The council responded (verbally) that they needed to exclude SCLP 12.4 from the “Masterplan” because the proposed 150 dwellings on this site are required to meet their 5-year allocation target.

The data provided in H20 clearly shows that this is simply not the case and this site is not required to meet the 5-year supply.

East Suffolk DC should remove the 150 dwellings provided by SCLP 12.4 from their 5-year housing supply assessment (H20); this can be done without threatening their compliance with targets. This would enable much better planning over the entire North Felixstowe area, particularly in respect of vehicular access. This also widens to all other aspects of infrastructure planning (cycle-ways, footpaths, drains, mains services etc.) which could then form part of a holistic masterplan.

Fair Play for Felixstowe
31st October 2019

457 words.