Representations on the Suffolk Coastal Local Plan Main Modifications

In Main Modification order

Addendum (August 2020)

Representations period: 01 May to 10 July 2020
Consultation on proposed Main Modifications to the East Suffolk Council – Suffolk Coastal Local Plan was held between 1st May and 5pm on 10th July 2020. The comments that were received have been published in the document ‘Main Modifications consultation - Responses in Main Modification Order’. This document is an addendum to that document, and contains the response submitted by Kirton and Trimley Community Action Group which was submitted prior to the consultation deadline however was omitted from the previous document. This document presents the representations in the order of the Main Modifications. A separate addendum has been published to the document ‘Main Modifications consultation - Responses in Representor Order’.
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Kirton and Trimley Community Action Group (KATCAG) (Irvine, Iain)

Comment ID: 567
Respondent Organisation Name: Kirton and Trimley Community Action Group (KATCAG)
Respondent First Name: Iain
Respondent Surname: Irvine

Comment: Response to Main Modification No 4 –

Document J65 - Para 3.39 – “Allocations for housing in this Local Plan exceed the total dwelling requirement for the period 2018 – 2036 by approximately 16.5% (approximately 1,610 dwellings), before an allowance for windfall is factored in. This over-allocation provides confidence that the overall housing requirement will be met even if some allocated sites fail to come forward.”

We believe the increased housing contingency to 16.5% is unnecessary, for a contingency rate of 8.5% was considered appropriate when the requirement was for the building of 582 dwellings per annum and the reason for the increase has not been adequately explained. There should also be far greater transparency around the true contribution made from windfalls, and exactly how they merge with other completions. According to an FOI request made by Mr Ian Cowan (FOI 132916562 & FOI 121230588) and also subject of unchallenged evidence given at the hearings, identified a total of 4647 windfall completions between April 2004 and March 2018 which realise a considerable average of 331 dwellings per year.

The Plan claims that between 2001 and 2016 employment grew by 13.4%. According to Nomis figures, 59,100 people were in employment in 2017, which suggests that between 2001 and 2016, approx 7,000 jobs were created thus averaging 440 per year. Only 2,600 jobs were created between 2011 and 2016, which is just over 50% of the number predicted between 2001 - 2016.

The catastrophic effects of the pandemic has also focused much attention upon the value of our high quality food producing farmland and the need to produce more for our country’s needs. Felixstowe, including the Trimleys is due to absorb the disproportionate amount of 38% of the housing, which would lead to the irreversible
process of concreting the land and the disappearance of many hectares of prime agricultural land.

This high level of aspirational new growth was clearly aimed at supporting the economic and jobs growth at the Port. The world was a completely different place when the Plan was prepared during 2018 and whilst the ambitions of the plan are laudable, reality has now kicked in and the volume of new housing can no longer be justified nor will it be achievable. Recent events now dictate that the Plan, in its current form, cannot deliver the level of housing that it set out to do and is therefore not effective.
Kirton and Trimley Community Action Group (KATCAG) (Irvine, Iain)

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**Respondent First Name** | Iain
**Respondent Surname** | Irvine
**Agent Organisation Name** |  
**Agent First Name** |  
**Agent Surname** |  
**Comment** | Modifications to MM5

The cancellation of the ‘three new bridges around the Ipswich docks’ and progress of a Northern Route option has detrimentally affected the long-term aspirations of improving ‘traffic flow’ in the area and stimulating wide ranging economic growth via the 6500 jobs, the housing programme and ultimately improving quality of life for all.

The amended version of Document J65 – Para 2.15 sadly lacks detail save mention of the informative strategy developed by Suffolk County Council, which is related to transport mitigation measures to address the consequences of development in the Ipswich Strategic Planning Area, and which is predicted to collectively add to significant strain on the transport network in and around Ipswich.

What is the strategy for delivering improvements to the A12 and A14? is there a strategy? The absence of any meaningful narrative does not inspire confidence nor manage expectations and give hope to business and the public that ESC are ahead of the game and on the ball!

Two items in the Ipswich Star dated Friday July 3rd refer to the urgent need for upgrades to both arterial roads including a strong warning by Business Chiefs of a ‘wasted opportunity’ if improvements to the A14 are left out of the Prime Minister’s £5billion post-coronavirus recovery plan. The current route along the A14 (Britain’s Premier Trade Route) between the Port of Felixstowe to the Northern Powerhouse and the Midlands Engine has been described as the equivalent of a country track - and not fit for the UK’s free trade in the future.

MP Dan Poulter has commented that traffic on the A12 route has increased 50% since completion of the last major work namely, the Saxmundham By-Pass in 1988.
The proposed building of Sizewell C together with East Anglia ONE and TWO windfarms will significantly add to the pressure for all those using the route.

The opportunity to send a clear message that East Suffolk remains ‘open for business and why’ has been sadly missed. The huge amount of unnecessary housing destined for the peninsula without the support of economic growth will lead to a greater amount of vehicle movements traversing the A14 instead of reducing the same. The Plan in its current form is unsound.
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**Comment**

Modification to MM49 - Policy SCLP 11.9: Areas to be Protected from Development – Now removed from Plan

This policy applies to 54 separate areas across the District

The Inspector initially raised this matter as one of several that he took away from the hearings for further consideration. Document J30 page 8 & 9 describe his thoughts, understandably questioning the validity of this policy in the absence of evidence to justify why each of the areas should continue to be designated etc and in particular drawing ESC’s attention to the absence of any review as was suggested in earlier local plan examinations. Page 427 of document A1 – Policy will be reviewed at point of next Local Plan (5 years).

The Inspector also advises that on the basis of the current evidence he considers the policy should be deleted. He did offer the council opportunity to prepare further evidence to support retention of the designations whilst the modifications were being finalised.

These designated areas have been insitu for many years

**ESC responded to the Inspector on 17 February via an unsigned Note** (Document J31) setting out their reasons for not progressing the evidence gathering as being complex and time consuming also identifying the most appropriate way forward was to accept the removal of the policy and make use of a number of quoted existing policies.

The casual approach to this matter by the Council is absolutely unbelievable and will undoubtedly lead to huge cost, anger and disillusionment of the public at large. This has been such a clear example of failing to live up to the Council’s “Vision and Values
making a commitment to improving the quality of life for everyone living in, working in and visiting East Suffolk”.

The removal of this important policy will undoubtedly lead to a plethora of planning applications that ultimately the public via the consultation process will have to fight with ‘one arm tied behind their back’. The removal of ‘Areas to be Protected from Development’ significantly weakens any objections to applications whereas the other legislation would also have been used to supplement objections. The removal has not been undertaken in the spirit of fairness ad adhering to the values espoused by the Council.

The effects of this removal particularly apply in respect of Document A1, Trimley St Martin (with parts of Trimley St Mary & Kirton – Map 70 – Page 608) also Land Surrounding Reeve Lodge (SCLP.66 - Map 70 – Page 608). Proposals for the Reeve Lodge site, when added to other completed, approved and proposed developments for Trimley St Martin shall lead to the ‘enclosure’ of Trimley St Martin, eradicating the character of the village forever.
General Comment

Kirton and Trimley Community Action Group (KATCAG) (Irvine, Iain)

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Comment

It is our contention that the Plan, in its current amended form including the proposed Main and Additional Modifications as described in Document J65 (Tracked Changes etc) does not appear to demonstrate it is ‘sufficiently flexible to adapt to rapid change’ (NPPF Para 11a). The Plan continues to rely heavily upon data derived from the East of England Forecasting Model (EEFM) – August 2016 and has not produced any evidence nor made specific comment to address any actions ESC are taking in response to the catastrophic economic consequences arising from the pandemic.

Document J65 was published 10.06.20 and given early indications of severe economic consequences emerging in March 2020 via media and press it is surprising to find no reference to this subject within Document 65 or Document 66 (Sustainability Addendum Report).

We did discover Government guidance to Local Authorities as at March 2020 was for all Local Plans to be completed by 2023.

Document 65 – Para 3.17 – “The East of England Forecasting Model (August 2016) forecasts the growth in jobs by sector and reflects trends based upon projections at the regional level and how the individual sectors have fared relative to historic growth in the region. Over the plan period (2018 – 2036) the number of jobs in the former Suffolk Coastal area is forecast to grow by 6,500, to 68,450, predominately in the service, tourism, business and professional services sectors. It is acknowledged that there is insufficient existing provision for small businesses and limited grow on space with many land owners reluctant to build employment sites speculatively. This will in part limit potential economic opportunities.

According to Document D3 (Economic Needs Analysis undertaken by Lichfields), the EEFM is currently maintained and developed by Cambridge Econometrics (CE) who have a long track record in the development of economic models for strategic
planning and policy analysis, at global, national and sub-national level. Forecasts are currently made up to 2045, reflecting the available global, national and regional forecasts. The longer-term forecasts should be treated with some caution, as unforeseen - but inevitable - future change in the underlying drivers will affect forecast accuracy. (The effects of the pandemic with regard the future employment situation is a case in point!)

Section 16 of Document D3 deals with conclusions of their Needs Analysis. Para 16.12:

“Whilst these projections provide a useful indication of how the IEA’s economy could change over the coming years, it is worth noting that there are inherent limitations associated with forecasts of this nature; they provide a ‘business as usual’ view of growth potential largely based on past economic performance and trends and do not take account of planned developments or policies which could influence the future direction of economic growth.

Document 65 - Policy SCLP3.1: Strategy for Growth in Suffolk Coastal District

The Council will deliver an ambitious plan for growth over the period 2018 – 2036 in Suffolk Coastal the plan area by:

a) Supporting and facilitating economic growth through the supply of significantly more than the baseline requirement of 11.7ha of land for employment uses to deliver at least 6,500 jobs and to enable the key economic activities to maintain and enhance their role within the UK economy;

Surprisingly the figure of 6500 jobs is mentioned several times within the document despite being subjected to unchallenged contradictory evidence given at the hearings by Mr Ian Cowan and Catcag.

The EEFM projections clearly cannot cater for unforeseen catastrophic events, therefore the projection of 6500 jobs during the lifetime of the Plan is at serious risk to say the least, with the increasing likelihood of significant job losses

This is further evidenced by comment published in the Daily Mail on Monday 6 July regarding the scale of the hit to the economy which includes:

- Almost 200,000 workers at house-hold name companies laid off since the start of Lockdown
- 59 house-hold-name companies have cut more than 195,000 roles since Lockdown
- Thousands of smaller companies have been reducing their staff
- A total of 2.8million are now claiming Jobseekers Allowance or Universal Credit
- The pace of cuts is picking up as the Government’s furlough scheme, currently used by 1.1million employers to protect 9.3million workers, draws to a close
- Thousands who have been let go had originally been furloughed, leading to fears that millions more furloughed workers will never return to their jobs

Across the East Anglian Region 750,000 jobs have been furloughed.
It is self-evident, when considering the above critical economic situation, in addition to the very recent collapse of a number of high-profile businesses (T M Lewin, Bertram Books, Harveys Furniture, Intu Properties) and with the high likelihood of others and smaller business enterprises to follow, when added to the steeply rising unemployment figures, necessitates the laudable aspirations of the Plan to be immediately re-evaluated.

In addition, the situation shall also significantly impact upon the number of dwellings required across the Plan area. If the jobs are not there the demand for housing diminishes. At this critical time it is also essential for the amount of high-grade quality farmland destined for development to be re-evaluated. The pandemic has highlighted a need

Reference NPPF – Preparing and reviewing plans - Para 31. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.

Although unforeseen as at 31 January 2020, recent calamitous events demand that ESC become better informed via the acquisition of more current data arising from and pertaining to the severe economic consequences of the pandemic, rather than taking a ‘business as usual’ approach.

As things currently stand, we do not believe the Plan has been:

- Positively Prepared – recent events dictate the re-evaluation of objectively assessed needs for homes and jobs in particular
- Justified – recent events dictate the Plan has not been based upon a robust and credible evidence base
- Effective – recent events dictate that the Plan in its current form, cannot deliver what it sets out to do

Therefore we consider the Plan to be Unsound.

Attached documents

Being kept informed

Not Applicable / No Answer