Comments received on the proposed Additional Modifications to the Suffolk Coastal Local Plan

East Suffolk Council – Suffolk Coastal Local Plan

Addendum (August 2020)

Representations period: 01 May to 10 July 2020
The consultation was held between 1st May and 10th July 2020. The comments that were received in relation to the Additional Modifications have been published in the document ‘Comments received on the proposed Additional Modifications to the Suffolk Coastal Local Plan’. 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.
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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 Katcag.

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