Representations on the Suffolk Coastal Local Plan
Main Modifications

In Representor order

Addendum – Further Representations

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. Respondents who have expressed that they feel disadvantaged in the consultation due to the Covid-19 situation were contacted by the Council and a short amount of additional time was provided to provide further assistance. This document contains the further responses that were submitted. This document presents the representations in the order of the representors and a separate document presents the responses in Main Modification order.
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Further response received following contact made with those who expressed they felt disadvantaged in the consultation due to the Covid-19 situation

Although I accept there has been some attempt by East Suffolk Council (ESC) to mitigate the impact of the pandemic on the local communities ability to participate in the consultation on the Local Plan major modifications, I do not accept that they are sufficient and broad enough taking into context the overall impact of this global crisis and the significance of the Local Plan proposals on the future of the peninsula, its landscape character and the lives of the people living in the region.

Having lived in the village of Trimley St Martin for over 30 years I know full well how this crisis has impacted the lives of the local and surrounding communities. In the present context making hard copies of detailed data available by post and for inspection at physical locations does not fulfill the obligation of a local authority to the people who that authority serves. Whilst people are losing family members, worrying about their health, that of their children/grandchildren, the loss of their employment, financial wellbeing and security they are unable to focus their attention on the depth of detail and critical thinking that needs to be applied to make effective and cogent responses to this consultation. The lack of ability to gather at public meetings to collectively discuss and debate these issues cannot be underestimated or ignored in these circumstances.

The World Health Organisation (WHO) has made two major statements in the last 7 days. They have declared this pandemic the worst in the history of
the WHO and they have stated that its impact will be felt for at least two decades. Chancellor Rishi Sunak has also stated that the economic effects of this crisis will be felt for the next two decades. The Local Plan is for a 20-year duration therefore the impact of the pandemic on the evidence base being used to support the housing densities must be reviewed now and planning policy is recalibrated to incorporate that impact. This may be unwelcome news for ESC who clearly would rather proceed with the proposals currently being assessed for soundness however as stated in Para 31 of the National Planning Policy Framework- February 2019 (NPPF):

Preparing and Reviewing Plans

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.

A global pandemic that has crippled the world and its economies and which financial institutions have stated will be the worst this country has experienced for over 300 hundred years (Bloomberg Financial June 2020) cannot be ignored and the impact has to be incorporated to reflect soundness as per current planning policy. The Government’s political leanings do not justify a local authority adopting a subjective approach to planning policy to suit that narrative. This matter has been raised with our MP the Rt Hon Therese Coffey and is currently being discussed at Westminster.

ESC state that in these times of uncertainty we need certainty within our planning policy. This is an ironic comment as clearly without the incorporation of the effect of the pandemic on economic data and a review of that impact on employment and housing densities the Local Plan is far from certain and therefore unsound. ESC state that they can review the Local Plan every five years as an argument to ignore requests to review the Local Plan now given the historic event unfolding. Apart from falling outside of current planning policy in the NPPF as outlined above the question then arises as to how you undo approved planning applications and unbuild developments completed or under construction.

Your invitation to submit additional comments by 3rd August is welcome and I wish to take up that invitation. However, due to the impact of the pandemic on my time availability, I wish to adopt the comments made by another resident Mr. Ian Cowan who has covered in extensive detail the cogent and logical arguments regarding the consultation process and the impact of the pandemic on the economic data being used to support the soundness of the Local Plan. I am in full agreement with his statements and therefore adopt them as my own and submit them under your invitation as an addendum to my original consultation response.
Addendum: 1st August 2020 To My Submission Dated 11th July 2020

One: Interim / Emergency Recommendation - Suspend The Local Plan NOW!

From the evidence presented below, instead of creating “at least 6,500 new jobs” over the Local Plan’s lifetime, it is far more likely that at least 12,000 replacement and new jobs will have to be created, the majority being in the last ten years of the Plan. This is an obvious impossibility, which means that the Local Plan is even more unsound than it already was!

The Interim / Emergency Recommendation made in my Submission dated 3 July 2020 is reinforced and enhanced by: (a) combining matters raised then with new matters described below and (b) considering the recent e-mails exchanged between myself and Desi Reed, Planning Policy and Development Manager at ESC, which are copied below. My original Interim / Emergency Recommendation stated -

“We are entering a historically unprecedented worldwide recession which, in the UK, could: (a) be worse than the consequences of the South Sea Bubble in 1720 and (b) last for much of the lifetime of the Local Plan! The short- and long-term economic and environmental implications of the Covid-19 Pandemic / Coronavirus Recession are obvious and extremely serious for both the District and the UK, as well as being of overarching national and international importance.

In short, the Covid-19 Pandemic / Coronavirus Recession means that no new jobs will be created and there will be no need to allocate food producing farmland for housing that will not be needed.

Therefore, I would strongly and respectfully Recommend that the Covid-19 Pandemic / Coronavirus Recession merits an Immediate Suspension Of The Local Plan as it relates to the permanent destruction across the District of food producing farmland for non-existing jobs and zero housing needs. I trust that these implications are also obvious to Planning Inspector Lewis, and only a cursory scrutiny of Consultation Responses should be necessary for him to reach an unsoundness conclusion and act accordingly.

The District deserves strong and decisive action before it is too late and Grade 1 and 2 food producing farmland is cynically destroyed for private profit at the expense of the greater good! Over to you Planning Inspector Lewis. Stakeholders are relying on you to do the right thing!”

Two: Justification For This Addendum

On 24 July a fellow stakeholder passed on to me a letter from Andrea McMillan, Principal Planner at ESC, dated 23 July, which stated: “It is noted that you have raised an issue in relation to the ability to respond due to matters related to Covid-19. ... Due to the circumstances surrounding this consultation, the Council is however able to provide a short amount of
additional time should there be anything further that we are able to assist you with in submitting your response. ... This is not an open opportunity to submit further comments but is an opportunity to submit or re-submit any comments that you consider were raised in your letter. ... Any further comments must be received by 9am on Monday 3 August.”

I believe that I fall within the category of stakeholders who can “submit or re-submit any comments” / make a further submission / re-submit comments already raised for the following reasons: (a) like every stakeholder my ability to respond was constrained and made more difficult by the Covid-19 lockdown where, among other things, I was unable to attend briefing sessions and public presentations or discuss matters face to face with colleagues (b) I should not be penalised or silenced just because I did not complain when making my original Submission and did so in time for the original deadline (c) I sought recent assistance from Desi Reed, as per an e-mail exchange reproduced below (d) I also sought e-mail assistance from Dr Therese Coffey, MP who did not have the courtesy to reply and (e) it would be prejudicial not to extend the same submission or re-submission opportunity to stakeholders who did not feel the need to complain at the time of their original submissions.

I am happy for Inspector Lewis to decide on the legitimacy of this Addendum.

**Three: An Impossible Jobs Aspiration**

There follows a new calculation, which is partly based on matters raised in my original Submission of 3 July 2020 and has been augmented and made even more credible by more recent evidence.

The May 2020 re-iteration of the Suffolk Coastal Local Plan, which incorporated various Main Modifications, continued to make the claim that "at least 6,500 new jobs" would be created over the Plan's lifetime. Inspector Lewis may recall that last year I made a FOIA request which confirmed that, rather surprisingly, this figure made no allowance for jobs that could be lost over the same period. In my Submission of 3 July 2020 I made a strong case that for various reasons, not all of which related to the Covid-19 Pandemic / Coronavirus Recession, that this figure was grossly overstated. It is now even more unachievable for the following accumulation of reasons -

One: Recent Jobs - The "at least 6,500 new jobs" figure was first published in the January 2019 iteration of the Local Plan but was not altered for the Main Modifications iteration in May 2020. This was a surprising omission, which could be interpreted as ESC’s predetermination to blindly follow their initial conclusions without taking contradictory evidence into account. It is reasonable to presume that new jobs were actually created during this pre-covid / pre-recessionary period.
If so, proportionately, this means that the "at least 6,500 new jobs" figure could be **reduced by 450**.

**Two: Innocence Farm** - Equally surprisingly, no adjustment has been made for the direct and indirect jobs that will no longer be created at Innocence Farm. This omission is also part of the pattern which confirms ESC's predetermination to exclude evidence that does not suit their purpose.

Conservatively, this could mean that the "at least 6,500 new jobs" figure could also be **reduced by 450**.

**Three: Port of Felixstowe** - It is well known that thanks to the nGen computer system, whose purpose is to enhance efficiency through automation, the Port will lose current employees and not gain new employees in future years. In addition, it was recently announced that a bounty of £10,000 is being offered to employees who give up their jobs. This will be exacerbated by increased competition from other UK Ports. This is yet another example of ESC's head in the sand attitude.

Conservatively, this could mean that the "at least 6,500 new jobs" figure could be further **reduced by 450**.

**Four: BT Adastral** - Last year, BT announced 14,000 jobs losses worldwide, including large numbers in the UK, with 900 at Adastral Park. It is possible that these redundancy figures could now substantially increase. More *ad nauseam* predetermination.

However, conservatively this could mean that the "at least 6,500 new jobs" figure could be **reduced by at least 900**.

**Five: Furloughing** - According to a recent article in the East Anglian, 12,300 people in Suffolk Coastal District have been furloughed as a result of the Covid-19 Pandemic / Coronavirus Recession. In addition, according to the Office for Budget Responsibility, 15% of all furloughed jobs could be permanently lost.

Conservatively, this new evidence could mean that the "at least 6,500 new jobs" figure could be **reduced by around 1,800**.

**Six: Recession** - There is considerable and convincing evidence from many informed quarters that the UK is about to enter / has already entered the worst recession in 300 years -

1. According to Rishi Sunak: *"There is no doubt there will be more hardship to come. This lockdown is having a very significant impact on our economy and we’re likely to face a severe recession."

2. The Office of Budget Responsibility predicts that the economy / output will not return to 2019 levels for another 5 years (ie. 2025 at the earliest), and even then it will be down by 6%.
3. The Organisation of Economic Development has estimated that UK unemployment levels could reach 11.7% by the end of this year.

4. ESC's own Chief Executive apparently agrees, because on 23 May 2020 he Re-Tweeted: "In local economic development, there is too much attachment to pre covid local industrial strategies and development/spatial plans. Must pivot now, and confront on-rushing mass unemployment and social hardship."

5. There are currently around 60,000 people employed in Suffolk Coastal District. Before the Covid-19 Pandemic unemployment in Suffolk was around 3.9%. If unemployment increases by 8.0% (11.7%-3.9%) this would mean around 4,700 jobs losses.

Conservatively, making allowances for jobs losses already estimated at Three to Five above (4,700 - 450 - 900 - 1,800) this new evidence could mean that the "at least 6,500 new jobs“ figure could be reduced by another 1,550.

Items One to Seven above Total 5,600 jobs that could potentially be lost across the District within the next few years (450+450+450+900+1,800+1,550). It could also be reasonably argued that this is a conservative estimate and the true figure could be much higher. Although my figures are speculative, they are evidence-based and have at least the same credibility as the claim that "at least 6,500 new jobs" will be created over the lifetime of the Local Plan, if not more so. All of these lost jobs will have to be recovered before any new jobs are created and will also mean that the "at least 6,500 new jobs" will have to be created in the condensed period of last few years of the Local Plan and after all the lost jobs have been recovered.

It is also possible, if not probable, that many of these jobs will be permanently lost even after an economic recovery.

In other words, for "at least 6,500 new jobs" to be created, around 12,000 actual jobs will have to be created in the District over the next 16 years (6,500+5,500), and probably not in the next few years at least. In reality, most of the new jobs will have to be created after 2026 at the earliest in the final post-recession years of the Local Plan. In addition, many other Districts in the UK have similar Local Plan jobs aspirations, and will be faced with the same problems regarding jobs losses and competition to attract new jobs.

By way of illustration, Table 2.3 of the Draft Local Plan shows “Baseline jobs growth in the ISPA”. Waveny was not part of this Table, but has been included below -

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<tr>
<td>Babergh</td>
<td>2,970</td>
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<tr>
<td>Ipswich</td>
<td>15,580</td>
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<td>Mid Suffolk</td>
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Taking account of redundancies and jobs losses, for 35,320 new jobs to be created in the ISPA it is probable that over 60,000 jobs will have to be created in total. Furthermore, Suffolk Coastal will not only be competing for jobs with Waveney and other members of the ISPA but also with other District Councils across the UK. Any reasonable person will surely conclude that this is a ludicrous aspiration, which further confirms the Suffolk Coastal Local Plan’s lack of soundness.

Four: ESC’s Head In The Sand Attitude

Below is recent e-mail correspondence with Desi Reed. No personal criticism is implied because Ms Reed is presumably toeing the party line.

IC to DR 22 July 2020: “The May 2020 reiteration of the Suffolk Coastal Local Plan continued to make the claim that "at least 6,500 new jobs" would be created over the Plan’s lifetime. You may recall that last year I made a FOIA request which confirmed that this figure made no allowance for jobs that could be lost over the same period. It has always been my contention that this figure was grossly overstated and is now even more so for the following reasons - [Comments at Three: An Impossible Jobs Aspiration] … Based on the above, I am interested in whether you / the Council still stands by the claim that "at least 6,500 new jobs" will be created and that this will happen in the condensed period of last few years of the Local Plan and after all the lost jobs have been recovered. I would also be interested in your views as to where and in which business categories all these jobs will occur. I look forward to your response, which I may publish on social media and pass on to local action groups and Annette Feeney.”

DR to IC 27 July 2020: “The points you raise about job numbers are noted. These are clearly uncertain times but the scale, nature and timescale of these impacts on East Suffolk is as yet unknown. However, this uncertainty provides strong and compelling reasons to ensure that we have a long term positive and planned approach to economic growth in place, as soon as possible, through the adoption of the new Local Plan that looks to 2036. To not move forward and to not continue to plan positively for the District would be far more damaging for the future of East Suffolk and the local and wider economy. Delay can only lead to greater uncertainty. Any longer-term impacts on the economy and jobs numbers would appropriately be considered through a review of the Local Plan, and at a time when any longer-term impacts can be fully understood. As you will be aware the Council is required to monitor the implementation of the Local Plan, and report annually, and this provides an opportunity to understand how the Local Plan is performing. The Council is also required to review the Plan and consider whether there is a need to revise it at least every five years.”
Therefore there are clear mechanisms in place post the adoption of a Local Plan to review and adapt according to circumstances at that time. This is sound planning for the long term. Finally, I can confirm that the comments you submitted to the Main Modifications consultation, which include some of the points you make in your email of 22 July, have been sent to the Inspector for his consideration.”

IC to DR 27 July 2020: “Thank you for this. However, many stakeholders would disagree with your wait and see approach regarding forthcoming recessionary events. Your statement that “this uncertainty provides strong and compelling reasons to ensure that we have a long term positive and planned approach to economic growth in place, as soon as possible” confirms that the Local Plan needs to be urgently revised / should already have been urgently revised to take these matters into account. Ignoring the matters raised in my e-mail of 22 July is not positive planning. In my business life, if I was producing a financial forecast it would have been grossly irresponsible of me not to incorporate the impact of known events on the grounds that we would understand impacts better in a years time and a review would be undertaken in five years time. Businesses in the District and elsewhere who are currently suffering from the Coronavirus Recession and will continue to suffer for years to come are not waiting for a year or five years before they do anything about it. Should the same standards not also apply to ESC?”

DR to IC 28 July 2020: “I think my response is quite clear and I have nothing further to add.”

This exchange confirms beyond doubt that ESC are determined to stick with their discredited view that “at least 6,500 new jobs” will be created over the Local Plan’s lifetime.

Inspector Lewis saw through their flawed arguments regarding the Innocence Farm Project. Stakeholders trust that he will do the same with their fatally flawed claim regarding 6,500 new jobs.
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<td>Comment</td>
<td>Further response received following contact made with those who expressed they felt disadvantaged in the consultation due to the Covid-19 situation. Thank you for your email and letter. I actually didn't raise anything about Covid, simply that the website was very difficult to negotiate in order to make comments. It would be good to have a lay person check it for you in future. I almost gave up responding, but I'm glad I didn't. This is a vital issue in Grundisburgh to save killing people.</td>
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Waltham, Barbara and Bruce

MM86

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| Comment | Further response received following contact made with those who expressed they felt disadvantaged in the consultation due to the Covid-19 situation

I have been given permission by a resident who lives in Half Moon Lane to forward the below to you. We know the time for objections is over but this needs to be placed on record somewhere. Our water pressure is always going up and down and has worsened since Felgate Way was developed, and often we have burst mains in the main B road through this village, we get many road closures and diversions which would cause construction lorries and vehicles to use Meeting Lane Chapel Road and Lower Road, with the blind bend as you try and get out of Meeting Lane there will be fatal accidents occurring!!!!

Barbara Waltham
Grundisburgh.

Has anyone noticed a fall in water pressure over the last year or so - ours is terrible since they built the large house behind us (and the new estate off the Ipswich road). During construction the heavy delivery lorries broke the water main on Half Moon Lane - i think the same will happen if the Chapel Field estate is built - the lorry's carrying heavy loads of bricks etc. will probably break the water mains under The St and Rose Hill - the road will have to close and can you imagine the damage to the surrounding lanes as the lorries use 'alternative', routes. Maybe need to see where the water mains run in the village because they certainly will not stand the sort of weight they will be subjected to on a frequent basis. After the
Further response received following contact made with those who expressed they felt disadvantaged in the consultation due to the Covid-19 situation

I attach some photographs and a short dossier of flooding in Post Mill Close. Again I am fully aware that the time for objections is over but a need to have these sent to you for information purposes. I will have to send the remaining via a second email.

**MM86**

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Re Post Mill Close Grundisburgh Woodbridge – FLOODING

In 1973, and from that time, EVERY TIME we had heavy rain the Close would flood.

This mostly affected the residents of number 4, 6, and 8 as the lowest part of the Close is where the driveways of those properties join the Close. Over the next several years the council were phoned to report it on numerous occasions, although by no means every time we had the flooding. The problem was that if we had no further rain over the next 12 hours or so, the water would gradually soak away, so there was no evidence to see if anyone came to look. However the flooding was so severe that sometimes people could not exit their vehicles.

Finally, residents were so fed up with the situation that in September 2006 a resident took the pictures and sent them into the council that night.

After the council came to inspect, they realised that the soakaway that should have been dug in the centre of the Close didn't exist. They then dug a soakaway in the back gardens of numbers 7 and 8 and piped from that soakaway to the ditch along the west border of Chapel Field.

If this ditch were to be filled in then the flooding will recur.

Attached herewith are photographs of the flooding.
If the proposed development in Chapel Field were to go ahead and any part of that ditch touched then flooding would occur again in Post Mill Close.

For and On Behalf of the Residents of Post Mill Close Grundisburgh IP13 6UU.

Barbara Waltham

MM86

Comment ID 564

Respondent Organisation Name  

Respondent First Name Barbara and Bruce

Respondent Surname Waltham

Agent Organisation Name  

Agent First Name  

Agent Surname  

Comment Further response received following contact made with those who expressed they felt disadvantaged in the consultation due to the Covid-19 situation.

I attach herewith a copy of an article that has appeared in a newspaper yesterday.

We have of course placed our objections re Chapel Field but I want to reiterate that no developments are built off lanes even a lane that may be possible to widen, but a lane that leads to more lanes that are even narrower.

We based our objections on the lack of a safe access to the site for pedestrians, cyclists, vehicles or emergency vehicles and the vehicular conflicts on the local road network. Our village was only designated a large
village when Chapel Field was placed in the final draft Plan. We are NOT a large village. We are a village with extremely limited services and those services are saturated from time to time with vehicles and one cannot therefore access them unless you walk to them.

You are fully aware as is the Inspector of our objections, developments are normally built off A or B roads, Grundisburgh only has a C road running through the centre and of course Chapel Field is purely lanes.

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