Paragraph 2: “The two areas [Suffolk Coastal and Waveney] are identified as being separate Housing Market Areas … [They] have separate Local Plans identifying separate housing requirements … It is therefore relevant that their position in relation to five year supply is considered separately.”

This contradicts claims made in the Draft Plan. Co-operation is a legal requirement involving “constructive, active and ongoing engagement to maximise adjacent Local Plans effectiveness”. It is probable that separate consideration: (a) exaggerates and duplicates jobs and housing needs and (b) means the unnecessary sacrifice of even more food-producing farmland.

Paragraph 2 confirms my Inquiry evidence. There has been no co-operation between SCDC and Waveney in the formulation of their respective jobs and housing needs, even though they are now combined as East Suffolk DC. It is unrealistic to assert that their respective annual housing needs of 542 and 374 units, and total jobs of 6,500 and 5,000, are mutually exclusive and can be considered as “separate Housing Market Areas … [with] separate housing requirements”.

Since the duty to co-operate has been deliberately ignored, the Plan must be unsound regarding overstated jobs and housing numbers.

Paragraph 5: “To be considered deliverable, sites for housing should be available now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.”

This engages what I have described as “The Elephant In The Room”. Deliverable or delivered houses will be surplus to the District’s real needs, involving the reckless destruction of irreplaceable food producing farmland. Evidence was given in writing and at the Inquiry that because few, if any, local jobs will be created, people living in these new houses must commute unsustainably out of the District to their places of employment.

This aggravates the Climate Emergency that was recently declared by East Suffolk DC and other local authorities across the UK.

Paragraphs 24 to 27: “Windfall sites make an important and reliable contribution to housing delivery … These … are not expected to make a significant contribution to supply and are usually small in scale. … In the Suffolk Coastal area, completions of small windfall sites over the past five years equate to an average of 97 dwellings per year … developments are most likely to be small scale.”

Paragraph 28 and the Notes to Tables SC2 and W2 further state: “No windfall allowance is included for the first two years to avoid double counting with permissions”.

The blatant dishonesty of the Council’s various Windfalls claims shows contempt for: (a) the Planning Inquiry process (b) the Inspector and (c) all stakeholders!

Via FOIA requests I have obtained proof that -

1. Windfalls DO make a “significant contribution” to housing needs.
2. Significant Windfall numbers ARE already included in permissions “for the first two years”.
3. Windfalls are NOT “usually small in scale”.
4. Windfalls do NOT “average 97 dwellings per year”.
5. Windfall developments are NOT “most likely to be small scale”.

My Consultation Response included the following, highly relevant statistics, which were used by other participants and repeated at the Inquiry -
2. This averaged 521 units per annum in the five years to March 2018.
3. Known future Windfalls are 2,840 units, being 79% of the Draft Plan's 3,609 Outstanding Planning Permissions.
4. This averages 473 units per annum.

Therefore, the treatment of Windfalls is both unsound and dishonest, which casts doubt on the credibility of other claims, including the creation of 6,500 jobs and associated housing needs!

Paragraph 33: “The housing land supply calculation ... is carried out using the housing needs figure identified through the standard methodology.”

However, applying the “standard methodology” is not mandatory: “If it is felt that circumstances warrant an alternative approach but authorities can expect this to be scrutinised more closely at examination. .. Any other method will be used only in exceptional circumstances.”

Evidence was given in writing and at the Inquiry by myself and others that, due to Climate Change / Global Warming, an alternative, exceptional approach is warranted, in terms of Paragraphs 8, 20, 60, 149 and 150 of the NPPF, for reasons including -

1. The District is largely agricultural and “The breadbasket of Britain”.
2. Land allocated for housing is Grade 1 and 2 farmland, which must be strategically protected for long-term food production.
3. Climate Change / Global Warming will mean this farmland: (a) being lost to the sea and (b) becoming less fertile.
4. The 6,500 jobs figure: (a) is wrong because it ignores jobs losses, and (b) is unrealistic because the District, particularly the Colneis Peninsula, is not attractive to inwards investment.
5. Therefore, there will be no need for thousands of new houses.
6. Plus, as per Paragraphs 2.15 and 2.16 of the Draft Plan, there will be no significant economic growth during its lifetime.

There has been almost no population increase in Felixstowe / Trimley Villages since 2001. Therefore, even if the standard methodology is applied to the Peninsula there will be little growth / need over the Draft Plan's lifetime.

Paragraph 35: “Paragraph 73 of the Framework requires local planning authorities to apply an additional buffer of 5% to ensure choice and competition in the market for land. However, the buffer should be increased to 20% where there has been a persistent under delivery of housing, as indicated by the Housing Delivery Test results.”

Thanks to known Windfalls there will be no future under delivery of housing. Since Windfalls are housing developments not allocated within a Local Plan, their high historic and future numbers confirm that the Council have and will continue to be unwilling and incapable of adhering to the terms of the current or Draft Plan.

Conclusions: The calculation of a 5-year land supply is irrelevant because of “The Elephant In The Room”. Conclusive evidence was presented by myself and others that -

1. Few jobs will be created over the Draft Plan's lifetime.
2. Thousands of houses are not needed.
3. Irreplaceable farmland can and should be saved for food production.

According to Paragraphs 2.15 and 2.16, significant economic growth will only be sustainable: (a)
with major improvements to the A12, A14 and Orwell Bridge and (b) with a Northern Bypass. These events will not occur during the Plan's lifetime, confirming there will be few jobs and no need for housing over the same period.

Therefore, the calculation of a five year land supply is both academic and unnecessary.

22 October 2019

Word Count: 1,097