

Suffolk Coastal Local Plan Examination

Submission on Matters 2, 3 and 4 on behalf of KATCAG.

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Introduction

Planning Direct has been instructed by KATCAG (The Kirton and Trimley Community Action Group) to make a submission to the Suffolk Coastal Local Plan Examination with regard to unnecessary developments in the Trimley(s) / Kirton area of the Felixstowe Peninsula.

Trimley St Martin and Trimley St Mary are two villages to the west of Felixstowe on the Felixstowe Peninsula. They are classed as 'Large Villages' in the draft Local Plan (DLP).



Kirton is another village to the North-West of Felixstowe. Kirton is classed as a Small Village (with Falkenham) under the DLP.

We dispute many of the assumptions and findings of the DLP particularly, but not exclusively, as these findings affect the Felixstowe Peninsula and the area immediately around the villages.

The key concerns are:

- 1) Housing. That the housing numbers required by the Local Plan use out of date information and the site allocations required due to this (and the calculation of the windfall allowance) are too large. In addition the site allocations, in part, are in the wrong location. Further there is little evidence any meaningful 'duty to co-operate' has actually occurred. The DLP is unsound with regard to housing need and the amount and placement of allocations.
- 2) Employment. That the employment numbers required by the DLP are erroneous and based on faulty assumptions. The port-related employment numbers have been historically incorrect and demonstrate a failure to understand the nature of port-related employment, particularly with regard to warehousing (B8). Further, in the broader sense employment allocations fail to take account of allocations elsewhere and fail to demonstrate the 'duty to co-operate'. The DLP is unsound with regard to employment land need and the amount and placement of allocations.
- 3) That there is a link between housing and employment (one begets the other) and with both requirements in doubt, numerically and geographically, there is a further reinforcing of doubt regarding the soundness of the DLP.
- 4) That there is insufficient justification for the loss of farmland.
- 5) That the Innocence Farm Policy in the DLP is unnecessary and unjustified.

I, as Director of Planning Direct, have been appointed to write and in part at the hearing represent these concerns due to my unique experience; I was the former Planning Manager for Hutchison Whampoa (the owners of The Port of Felixstowe) and was responsible not only for securing planning permission for the Major Developments on the Docks but also overseeing other 'port-related' schemes on and off port. I was responsible for work with third-parties on and off dock port-related schemes. In addition I was responsible for planning policy for port planning and railways. I am a member of the Chartered Institute of Logistics and Transport.

One crucial assumption made by Lichfields¹ is that port-related warehousing schemes are required near the port. This is not so and betrays a fundamental misunderstanding of the modern port industry, geography and the logistics networks of the UK. **In fact the historic record shows that in the last 20 years almost no successful new warehousing has been built in the Felixstowe area, despite the step change in the size of the port and despite planning permission for two major warehousing developments being secured.**

Report structure

The report has been divided along the Matters guidance issued by the Inspector and there are three Sections plus two Appendices.

Matter 2, Matter 3 and Matter 4. No section is longer than 3,000 words.

¹ Study of July 2018 - Port of Felixstowe Growth and Development Needs Study. <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/suffolk-coastal-local-plan/local-plan-review/suffolk-coastal-local-plan-evidence-base/>

Matter 2 - The Suffolk Coastal Spatial Strategy.

A. Housing Provision

Standard Method.

1.1 Following the Regulation 19 consultation on the Draft Local Plan (DLP) the Government (February 2019) changed the method by which housing need was calculated through the introduction of the 'standard method'.

1.2 Paragraph 60 of the NPPF (National Planning Policy Framework) requires the standard method to be used unless 'exceptional circumstances justify an alternative approach':

NPPF para 60: "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."

1.3 A case for exceptional circumstance has not been made by the council.

1.4 The latest Planning Practice Guidance (PGG) published 22nd July 2019 requires that 2014-based household projections, not the 2016 based figures used in the first DLP, are used and the affordability ratio applied. This results in an annual need of 515 units per annum, not 582 units per annum, or a reduction from 10,476 to 9,270 units over the period 2018-26. ²

² Source Peter Brett Associate Report January 2019. <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Local-Plan-Review/Evidence-base/SHMA-Part-2-update-2019.pdf>

1.5 The Inspectors Guidance on Matter 2 indicates that the Council have now acknowledged a housing need figure of 542 homes per annum however we are not privy to that exchange and the new figure is not reflected in the assumptions made in the plan. I have therefore not commented on this.

1.6. The housing need figure is thus incorrect as it has not been produced in line with Government Policy. The Local Plan is thus unsound.

Windfall

2.1 The NPPF is clear in how windfall supply should be handled: *“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.” NPPF Para 70.*

2.2 The DLP envisages windfall: *“will come forward at a rate of at least 50 dwellings per year from 2020/21 onwards, and would therefore provide at least an additional 800 dwellings over the plan period.”* (Page 38 paragraph 3.38). There is no given justification for this figure other than the Council claiming that an average of 97 dwellings per annum have been delivered via windfall in recent years³ so the 50 unit per annum figure is a conservative estimate based, one assumes, on halving the historic rate.

Year to	Units
31st March 2018	525
31st March 2017	539
31st March 2016	553
31st March 2015	365
31st March 2014	124
31st March 2013	189
31st March 2012	191
31st March 2011	167
31st March 2010	227
31st March 2009	450
31st March 2008	292
31st March 2007	435
31st March 2006	395
31st March 2005	135
Total	4647
Average all Years	332
Average last 3	539

³ SHELAA Paragraph 2.33.

2.3 However, looking at the historic rate of windfall delivery the figure of 97 units per annum is understated. The SHELAA (Strategic Housing and Economic Land Availability Assessment), goes on to say that *“To avoid double counting with sites identified as potential in the SHELAA, only average delivery rates of windfall sites below 0.2ha have been considered.”* This of course raises the question as to the level of windfall development on sites larger than 0.2ha. The NPPF definition of Windfall Sites is: *“Sites not specifically identified in the development plan.”* (Page 73 NPPF). It is a very clear definition and the Council have, by effectively filtering out any site over 0.2ha, applied their own definition contrary to the Government definition.

2.4 Looking into this Mr Ian Cowan, via several Freedom of Information Act (FOI) requests, established the actual windfall provision as follows (see Table above).⁴

2.5 That averages 332 p.a. over the period or 539 p.a. over recent years. Note: 2,840 of the outstanding planning permissions of 3,609 are also windfalls.

2.6 Clearly the given (under 0.2ha) rate of 97 d.p.a. is too low and the DLP figure of 50 units of windfall per annum inadequate.

2.7 A conservative figure, following the logic of the council, would be to take a figure of half recent experience at 270 units per annum (539 / 2).⁵ That is a huge 220 units per annum greater than the given figure of 50, but it is based on historic evidence in line with paragraph 70 of the NPPF.

2.8 The Council could, of course, claim that high windfall rates have been in periods when the Council's 5YHLS has been successfully challenged. However there have been substantial windfall permissions over the entire period back to 2005 and the highest figures, in recent years, are when the council has claimed a 5YHLS.

2.9 There may, of course, be political reasons not to acknowledge a high windfall rate but that is not a consideration for the Local Plan.

⁴ See Appendix 1 for the FOI correspondence.

⁵ Of note the figure of 539 average windfall per annum is similar to the predicted need of 582 (or 515) units per annum!

2.10 Clearly, the 50 windfall per annum figure in the DLP is not based on evidence is not based on the Government's definition of windfall sites and is (in terms of the impact on the countryside and environment of unnecessary allocations) dangerously low. The DLP is thus unsound on this point.

C Distribution of Growth and the Settlement Hierarchy

Housing

Garden Neighbourhoods

3.1 The Council proposes two garden neighbourhoods (one at Saxmundham and one at Felixstowe). It offers no evidence as to why this is a relevant approach for development in a rural district. Nor why development should be concentrated in large part at Felixstowe⁶ (at the end of a peninsula). Nor at Saxmundham which is a small town equidistant from the main employment areas inside and outside of the District (Ipswich, Felixstowe and Lowestoft). Without other evidence it appears the Council has merely decided to concentrate growth in the larger settlements within the district whilst ignoring the major employment places of Ipswich and Lowestoft outside of the District. Given the relative larger size of the market town of Woodbridge, it's closer proximity to Ipswich (and Felixstowe), it is odd no major development is planned there. There is a distinct lack of logic or justification in the 'garden neighbourhood' plans. The Local Plan is unsound on this point.

Settlement Hierarchy

3.2 Under the settlement hierarchy Kirton is classified as a Small Village and the Trimleys as large villages. The Trimleys (as part of Felixstowe) are due to have 38% of the new growth in housing identified in the Local Plan (page 39). Yet the Trimleys should be protected by the Local Plan Policy SCLP5: (Housing Development in Large Villages).⁷ It should be noted the Inspector has referred to the area as 'rural'.

⁶ I will return to argue why employment growth at Felixstowe is going to be negligible if not flat (as it has been in recent years) in the Matters 2, C section on Employment.

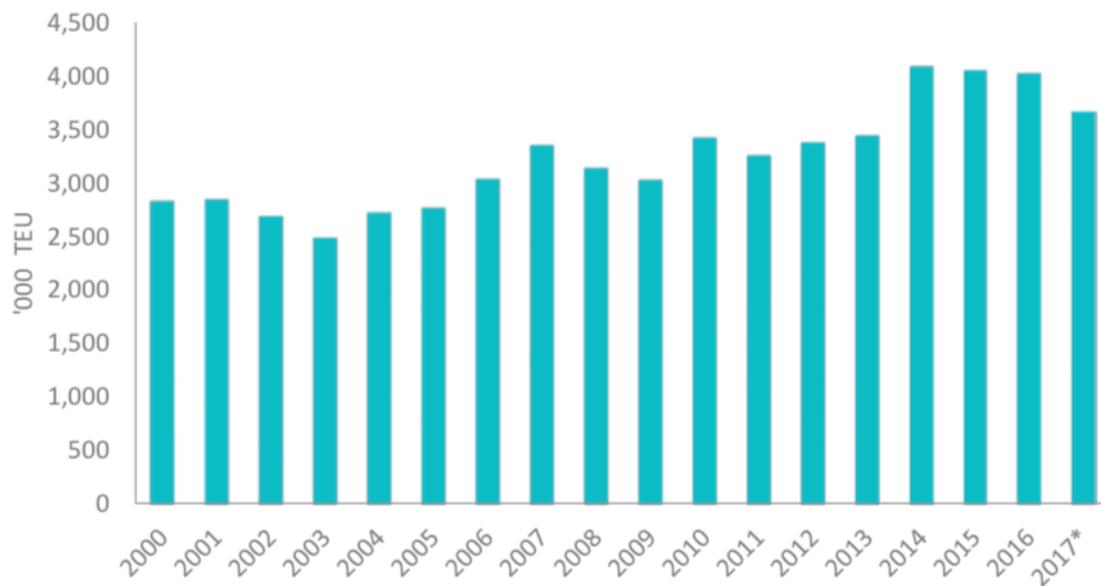
⁷ See Matter 4 section for more detail on this.

Employment

3.3 Much of the growth in employment forecast for the Felixstowe area (and hence housing numbers) is predicated on the belief that the Port itself requires more labour as it grows and that port-related industries will also grow as the Port grows. This is neither historically accurate nor based on how the port / logistics business works. This is not to fault Lichfields or indeed the planning officers. They have merely taken accepted cause / effect relationships from other industrial sectors and applied them to a sector which operates very differently.

3.4 Employee numbers have actually fallen at the Port of Felixstowe as it has grown. In the year 2000 numbers were as large as 3,300 but have fallen in recent years to approximately 2,500.⁸ The port has continued to grow but at a slower rate than previously forecast achieving 3.5m TEU (Twenty Foot Equivalent) Movements in 2017 not much greater than previous records in 2007 and 2010.

Figure 2.8 Felixstowe TEU Throughput



Source: Royal HaskoningDHV / Department for Transport Statistics * Note: forecast

⁸ Hutchison Ports UK response 2846 dated 13th September 2018.

So what is happening?

3.5 Firstly the Port of Felixstowe has real competition. The £1.5bn London Gateway opened in November 2013 and has established itself as a major player in the UK Container Terminal market, achieving a turnover of 700,000 TEU per annum.⁹ The present capacity of London Gateway is 1.6m TEU with the ability, using extant planning permissions, to grow further should it be required. In addition, there is extra capacity at Tilbury and Liverpool.¹⁰ Plus, both Liverpool and Southampton have plans to expand capacity. Services have already left Felixstowe for London Gateway and Uniserve's off-Port activities (the developer of Clicketts Hill) leaving two years ago.

3.6 Much of the Port of Felixstowe's former growth has been built on a lack of competition. With competition on several fronts now and investment required just to enable the port to continue to service the new generation of larger vessels (requiring larger cranes and deeper water) it must handle, it is unlikely the port will continue to grow at its historic rate and certainly no evidence has been provided it will.

3.7 There has been no increase in jobs because the Port has introduced automation as have most terminals in the world, including London Gateway. New cranes now operate without drivers and indeed IMV s (Internal Movement Vehicles run by robots have been developed in Rotterdam by the same company that owns the Port of Felixstowe.

3.8 Not only is plant increasingly automated but the Port's systems are more automated. Overall this has led to a decline in directly employed labour whilst throughput has increased. In this way, the container terminal is way ahead of a long-term trend in employment - the switch to automation - long predicted but not modelled by the Government in its employment creation algorithms. Irrespective of automation however, and the poor prospects for growth, one need only look at past forecasts and actual outcome in jobs to see that there is something very wrong with Port-related employment forecast and, thus, the allocation required.

⁹ Source Lichfields: 'Port of Felixstowe Growth and Development Needs Study' 2018.

¹⁰ Sourec Lichfields: 'Port of Felixstowe Growth and Development Needs Study' 2018.

3.9 With regards to historic job creation there is a real concern that the Council does not know how many jobs have been created or lost or indeed what the success or not of their forecasting has historically been. I have included at appendix 2 a section of a report, again prepared by Mr Ian Cowan regarding historic job creation. On this point alone, I believe, **Mr Cowan's interactions with the Council have demonstrated that the assumptions behind the employment jobs (and therefore land use needs figures) are inadequately justified and therefore unsound.**

3.10 Looking at employment land use in the Felixstowe area whilst there has been additional land reclaimed for quayside operations (handling deeper ships) there has been no additional port-related land in use on or off the port for many years.

Lichfields Reports

3.11 The justification for the Councils position on port-related employment land requirements is in the two Lichfields Reports.

Ipswich Economic Area Employment Land Supply Assessment - Suffolk Coastal. March 2018

3.12 There are a number of concerns with this report.

3.13 The report itself acknowledges a 'business as usual' case of a requirement of only 3.8 ha of Industrial (B1c/B2/B8) land to 2036 (page 14 para. 4.8).

3.14 At page 20, para. 4.24, the report acknowledges that growth is only predicted to be 0.2% p.a. in this sector. The report then makes a huge illogical leap. *"The success of Suffolk Coastal's transport and logistics is, to a large extent, contingent on the success of the Port of Felixstowe. It is important that suitable sites/premises are made available for the Port to expand into port-centric logistics."*

3.15 The first sentence is true but there is no evidence that port-related activities require more land¹¹, in fact there is much evidence to the contrary. Lichfields have not substantiated this remark.

¹¹ I will explain why later in this section of the report.

3.16 On the next page (para. 4.25) Lichfields go on to claim that ports are closely linked to the energy and offshore installations sectors. Some ports are, but not Felixstowe. There is no such activity at Felixstowe. It is simply too far away from the wind turbine fields!

3.17 Further on (para. 4.25), Lichfields claim there is a need for 'associated distribution centres'. There are none, none planned, and none required. Again another illogical leap.

3.18 (para. 4.26) The report goes on to claim there is demand along the A14 corridor for logistics space. There is no evidence for this. There is demand, close to the port, for haulage yard space (somewhere to park trucks and store containers overnight before taking them across country) but this requirement is minimal.

3.19 Helpfully, the report goes on to predict that only 620 jobs are to be generated (Table 4.3, page 24) and the majority of these in transport and logistics (driving and managing trucks). Only 180 jobs are in Warehousing (the so-called port-centric activities). This is very small number indeed, yet still large given the lack of need for port-related warehousing. However if one accepts this number it clearly does not require a significant amount of land for jobs or indeed the concomitant need for housing.

Port of Felixstowe Growth and Development Needs Study - Final Report. July 2018

3.20 The report echoes the same points as the March 2018 study. Crucially we find the main source of the discrepancy between actually required land and fancifully large claims. In para. 4.19, page 38, it is claimed that only 25% of containers are moved by rail. It is 29% and crucially set to increase to 40% <https://www.portoffelixstowe.co.uk/press/news-archive/port-of-felixstowe-rail-improvements-receive-go-ahead/>. Thus, the requirement for road transport facilities is overstated.

3.21 The report goes on to claim (g 4.6) that 30% of containers are dealt with locally 'off port'. There is no justification for this figure. It is simply untrue. If that was the case 1.2m TEU of containers would be handled in warehouses and in open storage in the Felixstowe area today! There are very few, perhaps some few thousand special loads handled locally. Lich elds have not justified this figure, yet it is the basis behind ALL the supposed warehousing requirement and off-port land required. This figure requires very careful examination at the hearing.

3.22 Looking at the footnote (page 38) it seems their 30% figure comes from the balance of containers when an allowance of 70% going to the 'golden triangle' is factored in. I agree with the 70% figure, but it is illogical to think that means 30% remain in the Felixstowe Area! Lichfields have made a major and embarrassing error here and one that should have been spotted by the Council. A realistic future could be as low as 1% or less given the size of the local end market for goods in rural Suffolk and the unsuitability, geographically, of the Felixstowe Peninsula as a distribution hub.

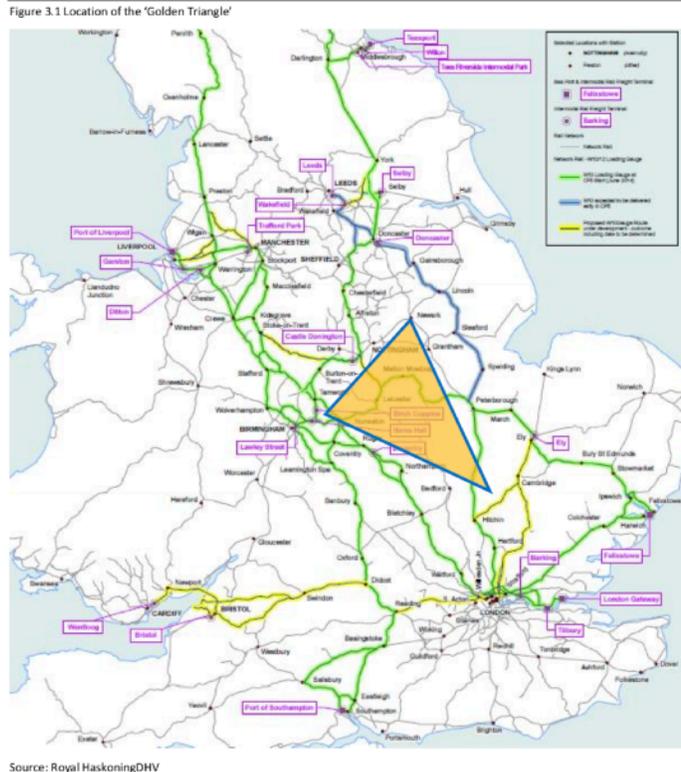
3.23 In para. 4.26 Lichfields indicate that off-port related land requirements (in the District) are needed no more than 10 miles from the port. I agree. This will be the hauliers requiring yards near to the port. Not other activities. Again Lichfields should be asked to split the responders to their survey work by haulage firm and the other types of user.

[The myth of the Port-Centric Logistics argument.](#)

3.24 So why am I so clear in believing there is little if any port-related warehousing or outside storage requirement in the Felixstowe area?

1) Whilst port-centric logistics was discussed as a concept for many years (mainly by port owners with land to spare for rent) it has not been taken up by the logistics providers or national retailers. I, and other colleagues at the Port of Felixstowe, spent many years attempting to lure the major supermarkets to Felixstowe but none came. Other major importers were equally disinterested. Felixstowe is simply in the wrong place at the eastern extreme of the country when the major importers have retained and further developed their hub and spoke 'golden triangle' (see overleaf) based logistics networks. So whilst the concept was widely spoken of, and planning applications justified on the back of it, it has not happened.

2) I am also clear that the port-centric logistics concept is myth because of what history has taught us. Despite the Port of Felixstowe promoting this idea for many years. There has been no take up. Indeed the port secured planning permission for a major warehousing development in 2014 <https://www.bbc.co.uk/news/uk-england-suffolk-30398235> but it has never been constructed as there has been no demand. Similarly, Uniserve secured planning permission for another very large warehouse at Clicketts Hill <https://www.ipswichstar.co.uk/news/business/felixstowe-huge-new-distribution-centre-gets-go-ahead-500-new-full-time-jobs-promised-1-3310578> but Uniserve have not finished or occupied this warehouse.



3.25 In conclusion the number of people working in the ports industry at Felixstowe has declined on-Port and there is no well-researched evidence to support any claim it has increased overall, despite throughput at the Port increasing.

3.26 The amount of land required is based on the assumption port-centric logistics will take off when there is no evidence it will, nor indeed has.

3.27 Assumptions have been made as to the number of containers handled off-Port, in the local area, which are demonstrably not based on fact but based on an embarrassing numerical mistake. (100% - 70% 'golden triangle' container = 30% container in the Felixstowe area)!

3.28 In short the employment numbers and therefore employment land requirements are demonstrably unsound and the DLP should be rejected on this basis.

Link between housing and employment.

3.29 The population of Felixstowe has increased by only 1.9% (2001 to 2017) despite the supposed number of jobs increasing. With the employment numbers in such doubt the effect of this on the requirement for housing should be examined critically. The Council should be required to provide accurate population and employment numbers back to 2001 to see exactly what has happened. I suspect it will demonstrate that despite the Port throughput going up employment numbers are flat, if not down, and population figures will reflect this.

F Infrastructure

3.30 The Orwell bridge is at capacity with no plans to increase its potential capacity. With the DLP concentrating both housing and employment land to the east of the bridge the effect of this, vis-a-vis the bridge, should be examined critically. <https://www.eadt.co.uk/business/orwell-bridge-is-major-bottleneck-ports-report-concludes-1-5498438>.

Matter 3: Area Specific Strategies - Development Allocations

Policy SCLP12.7: Port of Felixstowe

4.1 The Port of Felixstowe is an existing employment area and KATCAG have no objection to the ongoing classification and promotion of this area as employment land.

4.2 It should be noted that this area includes open land and the extant planning permissions, discussed earlier, o-Port and at Clickett Hill for large-scale port-related warehousing developments (2014) that have not been built out.

Policy SCLP12.9: Land at Carr Road/Langer Road, Felixstowe:

4.3 Promotes the development of B1 and B2 proposals along Carr / Langer Road. Again this is supported and it is noted that much of this classification, if required, would be ideal for port-related offices / light industrial support to the port.

Policy SCLP12.10: Land at Haven Exchange, Felixstowe:

4.4 Again promotes B1 and B2 Port-related uses and is supported.

Policy SCLP12.18: Strategy for Communities surrounding Ipswich:

4.5 This policy is not ambitious enough. The Felixstowe area (including the Trimleys) is due to receive 46% of the proposed new housing growth and after allowing for the development of Brightwell Lakes the Ipswich area an additional 1% only.¹²

¹² Pages 38 and 39 of the DLP.

4.6 However we have already established that the economic (port-related jobs based) driver for growth in the Felixstowe area is dubious (and therefore any employment related housing growth dubious in the Felixstowe area) and the projected requirement for housing delivery via planned allocation is far too high, due to an inadequate windfall allowance.

Justification for Felixstowe and Saxmundham

4.7 The main argument for so many houses to be built in the Felixstowe area is the need to house port-related employees. If the Inspector accepts these jobs have historically not been required and will continue to not be required (as the assumptions on which this mythical growth forecast are wrong) then the Inspector must conclude that other than some organic growth at Felixstowe the bulk of the housing required for the council area should be concentrated in sustainable locations, and as the major employment location in the area, the bulk of the housing should be in and around the communities surrounding Ipswich and not Felixstowe or indeed Saxmundham, which seems to have no justification at all for the Garden Neighbourhood proposal.

Duty to Co-operate

4.8 Of course one would expect to see much discussion of this matter between the councils of the Ipswich and Waveney Housing Market Area yet we are not presented with a significant amount of evidence any meaningful 'duty to co-operate' (on housing or employment land) has actually occurred. Ipswich, for example, has failed to achieve its 5YHLS for many years. Employment need in Ipswich is outstripping supply of housing. This is a significant indicator that housing in Felixstowe, Saxmundham etc, without local employment need, is inherently unsustainable and should not be supported.

4.9 Overall this policy is not ambitious enough as it fails to recognise cross-boundary requirements and the lack of a port-related employment case for Felixstowe. The council is in real danger of building thousands of houses in the wrong places, with the majority of economically active people commuting to and from Ipswich.

Policy SCLP12.2: Ransomes, Nacton Heath:

4.10 This is noteworthy in that it allocates 30ha of employment land with an Outline Planning Application already approved for B8 use on 26.6ha of the site - a substantial contribution to the 'pipeline' supply already identified of 73.02ha in the A14 corridor (roughly a third).¹³ Looking at the Ransomes site, Clickett Hill site and Felixstowe Logistics Park these provide 67ha of land between the sites allocated or with extant planning permission or 99% of the requirement identified by the Lichfield Report.

Policy SCLP12.35: Land at Innocence Farm:

4.11 As has been acknowledged¹⁴ any case for Innocence Farm rests on the high-growth scenario identified by Lichfields. I have already discussed why any case for additional warehousing land is dubious (and historically so) and therefore allocating land, by policy for a high-growth scenario is unsound.

4.12 Notwithstanding this general point the site itself is in a poor location and does not have many of the benefits ascribed to it;

- When extant planning permission on and just off port (Clicketts Hill) have not been built out, it is because operators cannot be found who wish to use the land. Given that there is a premium on the ability of port-related operators to have their operation near or on the port to facilitate rapid movement on and off for hauliers or warehouse operators, then the lack of demand for closer sites only serves to demonstrate that the additional miles make the Innocence Farm site unusable in operational and financial terms with such small margins in the logistics sector;
- The use of the site will require additional access points onto the A14 which will be of considerable cost;

¹³ Lichfields: Port of Felixstowe Growth and Development Needs Study; Final Report July 2018.

¹⁴ Lichfields: Port of Felixstowe Growth and Development Needs Study; Final Report July 2018.

- The proposed railhead will simply not happen. There is no justification for it as there is no case for it, for the following reasons:
 - Rail operations become economic at 300 miles, not 3;
 - There are a limited number of paths available on the railway and these are prioritised for trains to and from the Port. The use of these paths has already been factored into Network Rail's 5 year plans for the developments required to enable the delivery of the additional paths and Hutchison Whampoa, (owner of the Port of Felixstowe) has, to some extent, funded these enabling works.
- The development is inappropriate for 'nationally significant infrastructure projects' requiring wide and heavy loads to and from the site Wind turbines are constructed at the coast for a reason;
- The site is lauded as one that will enable the public to access open space by use of the landscaping. The public can of course already access a wide network of footpaths and other rights of way in the area. This sleight of hand merely means to disguise the fact this large development will harm the open countryside and have a detrimental impact on landscape, biodiversity and vital amenity. It is by no means a benefit.

Matter 4: Policies

5.1 Where policies have already been discussed in the former section on Area Specific Strategies I have not listed those policies here:

Policy SCLP3.2: Strategy for Growth in Suffolk Coastal District

5.2 The Council suggests it wants to support and facilitate economic growth through the supply of significantly more than the baseline requirement of 13ha of land. Of course it is important to provide headroom and options for various employment sectors by providing more land than the baseline requirement but this policy has led to the justification for 67 ha in the Felixstowe area, which has had a concomitant effect of the location of housing growth as well (46% in the Felixstowe area). This policy is unjustified for reasons already given.

Policy SCLP3.3 Settlement Hierarchy:

5.3 The Council correctly places the Trimley Villages and Kirton in the Settlement Hierarchy but then ignores this treatment in order to find sites for allocation for the supposed growth requirements around Felixstowe the effect being to reduce separation between villages and between them and Felixstowe. It is encouraging that the Inspector has categorised, as far as the hearing process is concerned, these areas as rural. I agree entirely and it is the open nature of the landscape between these small settlements that is one of the principal characteristics of this rural landscape.

Policy SCLP4.2: New Employment Areas:

5.4 For reasons already discussed these new employment areas are not required and will, if used, result in the unnecessary development of agricultural land in the open countryside where the need is not justified.

Policy SCLP7.1: Sustainable Development:

5.5 The allocation of additional housing and employment land (and particularly at Innocence Farm) is inherently unsustainable. As already discussed the justification for port-related employment land is not there and / or already accounted for in extant permissions. Housing land allocation requirements are lower than stated and again in the wrong place. Planning to put houses on the Felixstowe Peninsula for employees who will not actually work in Felixstowe is inherently unsustainable.

Policy SCLP10.3: Landscape Character / Policy SCLP10.4 Settlement Coalescence.

5.6 The Landscape Character Assessment and Settlement Coalescence Policy for Trimley and the Foxhall Estates recommends appropriate development is considered in the context of AONB, landscape elements, significant views and the inter-relationship of settlements. It seems difficult to understand how one can support these policy aims whilst developing a 116ha site (Innocence Farm).

Farmland

The DLP does not have a policy regarding the value of farmland in landscape terms or indeed in economic terms. In order to value loss of farmland in policy terms one must assess its value in planning terms.

Appendix 1 - Mr Ian Cowan's correspondence with the council.

December 2018

From: Ian Cowan [<mailto:iancowan00@btinternet.com>]
Sent: **14 December 2018 15:23**
To: FOI
Subject: FOIA Request: Windfall Housing

Dear sirs

The draft Local Plan estimates that 800 windfall houses will be built over its lifetime.

Can you please tell me how many windfall houses have been built each year across the District from 2001 to 2017 inclusive. If possible, can you give specific figures for Felixstowe and the Trimley villages.

Many thanks

Ian Cowan

Trimey St Martin

On **18/12/2018** 15:34, FOI wrote:

Dear Ian Cowan

In response to your recently submitted FOI/EIR request, please find our reply attached.

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Please quote the above reference number in any communication about this request.

Regards

Sara

Sara Barratt

Customer Experience Officer

Customer Services



**EIR request– FOI32916562 (Suffolk Coastal)
Title: Windfall housing**

Request

The draft Local Plan estimates that 800 windfall houses will be built over its lifetime.

Can you please tell me how many windfall houses have been built each year across the District from 2001 to 2017 inclusive. If possible, can you give specific figures for Felixstowe and the Trimley villages.

Response

Please see table below showing figures for windfall completions from 1st April 2004 – 31st March 2018. Specific figures for Felixstowe and the Trimley villages are not available.

Source: SCDC monitoring records

	Windfall completions (across whole district)
1 st April 17 – 31 st March 18	525
1 st April 16 – 31 st March 17	539
1 st April 15 – 31 st March 16	553
1 st April 14 – 31 st March 15	365
1 st April 13 – 31 st March 14	124
1 st April 12 – 31 st March 13	189
1 st April 11 – 31 st March 12	191
1 st April 10 – 31 st March 11	167
1 st April 09 – 31 st March 10	227
1 st April 08 – 31 st March 09	450
1 st April 07 – 31 st March 08	292
1 st April 06 – 31 st March 07	495
1 st April 05 – 31 st March 06	395
1 st April 04 – 31 st March 05	135
TOTALS	4647

Date

(FOI admin team to complete)

Date received by the Council	14/12/2018
Date response sent to requester	18/12/2018

Windfall completions for Felixstowe, Trimley St Martin and Trimley St Mary

	Felixstowe	Trimley St Martin	Trimley St Mary
1 st April 17 – 31 st March 18	37	24	8
1 st April 16 - 31 st March 17	53	42	1
1 st April 15 – 31 st March 16	109	1	5
1 st April 14 – 31 st March 15	14	2	1
1 st April 13 – 31 st March 14	10	3	7
1 st April 12 – 31 st March 13	17	8	1
1 st April 11 – 31 st March 12	57	0	0
1 st April 10 – 31 st March 11	8	0	2
1 st April 09 – 31 st March 10	22	1	0
1 st April 08 – 31 st March 09	21	0	1
1 st April 07 – 31 st March 08	18	5	9
1 st April 06 – 31 st March 07	81	2	1
1 st April 05 – 31 st March 06	53	1	3
1 st April 04 – 31 st March 05	20	12	2
TOTALS	520	101	41

From: Ian Cowan [<mailto:iancowan00@btinternet.com>]
Sent: **19 December 2018** 10:18
To: FOI
Subject: Re: FOI/ EIR request: FOI32916562, Windfall housing, (SCDC)

Dear Ms Barratt

The schedule provided by you to me shows that there were 1,064 (525 + 539) windfall completions across the District in the two years to 31 March 2018. Table 3.5 in the draft Local Plan (page 45) shows that over the same period there were 1,130 housing completions in total. Does the latter figure include windfalls?

Also, when you say in your FOIA reply that "Specific figures for Felixstowe and the Trimley villages are not available" does this mean that SCDC do not know where and in what numbers the windfall housing has arisen?

Many thanks

Ian Cowan

Subject:	RE: FOI/ EIR request: FOI32916562, Windfall housing, (SCDC)
Date:	Fri, 21 Dec 2018 08:53:30 +0000
From:	FOI < FOI@eastsoffolk.gov.uk >
To:	'Ian Cowan' < iancowan00@btinternet.com >

Dear Ian Cowan

Thank you for your email. I have asked our planning policy team to clarify the figures and information provided and will respond as soon as possible.

Kind regards
Helen
FOI Team
Customer Services
Suffolk Coastal and Waveney District Councils
Tel: 01502 523389

January 2019

From: FOI
Sent: **08 January 2019** 16:47
To: 'Ian Cowan'
Subject: RE: FOI/ EIR request: FOI32916562, Windfall housing, (SCDC)

Dear Mr Cowan

Just to update you on your request for clarification. I have chased this up with the planning policy team for you today.

They have advised we don't hold the information in the format you requested, but they are doing the analysis to get you the figures. They hope to have this completed by the end of this week. I will forward the response onto you once I receive it.

Kind regards
Helen

Customer Services Team
Suffolk Coastal and Waveney District Councils
Tel: 01394 383789 Tel: 01502 562111

Subject:	RE: FOI/ EIR request: FOI32916562, Windfall housing, (SCDC)
Date:	Fri, 11 Jan 2019 11:57:06 +0000
From:	FOI < FOI@eastsuffolk.gov.uk >
To:	'Ian Cowan' < iancowan00@btinternet.com >

Dear Mr Cowan,

We have been updated by the Planning Policy team that they will be unable to respond today. They expecting their response to be ready by the end of Tuesday 15 January 2019.

Please accept our apologies for the delay.

Regards
Rachael

FOI Team
Suffolk Coastal and Waveney District Councils
Tel: 01502 523627

<mailto:foi@eastssuffolk.gov.uk>

Subject:	RE: FOI/ EIR request: FOI32916562, Windfall housing, (SCDC)
Date:	Tue, 15 Jan 2019 13:31:51 +0000
From:	FOI < FOI@eastssuffolk.gov.uk >
To:	'Ian Cowan' < iancowan00@btinternet.com >

Dear Mr Cowan,

Please find attached and below the response to your request for clarification of our earlier response, as provided by our Planning Policy team.

The schedule provided by you to me shows that there were 1,064 (525 + 539) windfall completions across the District in the two years to 31 March 2018. Table 3.5 in the draft Local Plan (page 45) shows that over the same period there were 1,130 housing completions in total. Does the latter figure include windfalls?

Yes

Also, when you say in your FOIA reply that "Specific figures for Felixstowe and the Trimley villages are not available" does this mean that SCDC do not know where and in what numbers the windfall housing has arisen?

We do not hold these figures in the format requested but through analysis we can obtain this information and have undertaken the analysis for this request. See attached document.

I hope that this information is of assistance.

regards

Sara Barratt

Customer Experience Officer

Customer Services

Suffolk Coastal and Waveney District Councils

Tel: 01502 523389

From: Ian Cowan [<mailto:iancowan00@btinternet.com>]
Sent: **24 January 2019** 10:03
To: FOI
Subject: Local Plan: Windfal Housing

Dear sirs

Table 3.2 of the Draft Local Plan gives a figure of 6,998 for the Total Housing Commitment, made up of (a) Outstanding Planning Permissions 3,609 (b) Dwellings with resolution to grant planning permission - 2,413 and (c) Allocations without permission - 976.

Can you please tell me how much Windfall Housing is included in each of these categories?

Many thanks

Ian Cowan

Subject:	EIR request ref FOI33891514 - Local Plan: Windfal Housing
Date:	Thu, 24 Jan 2019 11:27:51 +0000
From:	FOI < FOI@eastsoffolk.gov.uk >
To:	'Ian Cowan' < iancowan00@btinternet.com >

Dear Mr Cowan,

Thank you for your request, which we have given the above reference number.

Your request will be dealt with under the terms of the Environmental Information Regulations 2004 (EIR) and/or Freedom of Information Act 2000 (FOI) and will usually be answered within 20 working days.

If your EIR request is particularly complex or requires the retrieval of a large amount of information, we may extend this to 40 working days. If this is the case, we will notify you as soon as it becomes apparent.

While no charges are made for the submission of requests, the council is entitled to apply reasonable costs for disbursements (i.e. photocopying, postage etc). Where charges apply we will notify you before releasing the information. Please see our published fees and charges: <http://www.eastsuffolk.gov.uk/yourcouncil/financial-information/fees-and-charges/>.

If you have any queries about this request please contact us at the email address below.

Please quote the above reference number in any future communications.

Please note that for requests received on non-working days the 20 working days will be calculated from the start of the next business day.

regards
Sara Barratt
Customer Experience Officer
Customer Services
Suffolk Coastal and Waveney District Councils
Tel: 01502 523389

Subject:	FOI/ EIR request: FOI33891514, Local Plan - windfall housing, (SCDC)
Date:	Mon, 28 Jan 2019 16:25:42 +0000
From:	FOI <FOI@eastsuffolk.gov.uk>
To:	'Ian Cowan' <iancowan00@btinternet.com>

Dear Mr Cowan

In response to your recently submitted FOI/EIR request, please find our reply attached.

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Please quote the above reference number in any communication about this request.

Regards

Sara

Sara Barratt

Customer Experience Officer

Customer Services

Suffolk Coastal and Waveney District Councils

Tel: 01502 523389



FOI/ EIR request– FOI33891514 (Suffolk Coastal)

Title: Local Plan: windfall housing

Request

Table 3.2 of the Draft Local Plan gives a figure of 6,998 for the Total Housing Commitment, made up of (a) Outstanding Planning Permissions 3,609 (b) Dwellings with resolution to grant planning permission - 2,413 and (c) Allocations without permission - 976.

Can you please tell me how much Windfall Housing is included in each of these categories?

Response

A – 2840 dwellings (windfall)

B – 28 dwellings (windfall)

C – 0 dwellings (windfall)

Date

(FOI admin team to complete)

Date received by the Council	24/01/2019
Date response sent to requester	28/01/2019

May 2019

From: Ian Cowan[mailto:iancowan00@btinternet.com]

Sent: **23 May 2019** 15:30

To: FOI

Subject: Suffolk Coastal: Windfall Housing

Dear sirs

The draft Suffolk Coastal Local Plan incorporates Windfall Housing at a rate of 50 dwellings per year for 18 years.

Can you please tell me: (1) How this figure was arrived at? (2) Which document in the evidence base contains evidence or a calculation to support this figure and (3) Which - if any - Council or sub-committee Meeting approved this figure?

Many thanks

Ian Cowan

Trimley St Martin

June 2019

Subject:	FOI/ EIR request: FOI121230588, Windfall Housing
Date:	Thu, 6 Jun 2019 07:55:01 +0000
From:	FOI <FOI@eastsoffolk.gov.uk>
To:	'Ian Cowan' <iancowan00@btinternet.com>

Dear Ian Cowan

Please find attached the response to your request.

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Please quote the above reference number in any communication about this request.

Regards

Sara



FOI/ EIR request – FOI121230588
Title: Windfall Housing

Date received: 23/05/2019	Date closed: 06/06/2019
<i>(FOI admin team to complete)</i>	

Request

The draft Suffolk Coastal Local Plan incorporates Windfall Housing at a rate of 50 dwellings per year for 18 years.

Can you please tell me: (1) How this figure was arrived at? (2) Which document in the evidence base contains evidence or a calculation to support this figure and (3) Which - if any - Council or sub-committee Meeting approved this figure?

Response

- 1) Figure of windfall allowance in the Final Draft Local Plan repeats the number included within the Core Strategy and Development Management Policies Document (July 2013). Historic monitoring evidence shows that 50 dwellings per year (total of 850 over the plan period 2010-2027) is an appropriate figure to use as outlined in paragraph 3.32 (page 27) of the Core Strategy. The Council has continued to monitor the number of dwellings constructed in the district and consider that provision for 50 dwellings per year is still appropriate as detailed in paragraph 3.38 (page 38) of the Final Draft Local Plan.
- 2) The Council publishes a Housing Land Supply Assessment annually (<http://www.eastsuffolk.gov.uk/planning/local-plans/suffolk-coastal-local-plan/monitoring-information/housing-land-supply-assessment/>) which details the number of dwellings constructed each year and the number of planning permissions across the district. Looking specifically at the most recent versions of this assessment, Table 4, page 11 (of the 2017 assessment) and Table 4, page 6 (of the 2018 assessment) provide details of the number of dwellings on sites with planning permission and less than 5 units. These figures fluctuate each year but when averaged out give indication as to why the windfall figure of 50 dwellings is still considered appropriate in the Final Draft Local Plan covering the former Suffolk Coastal area.

3) The Final Draft Local Plan was prepared with input from the Local Plan Working Group which met regularly since 2017. Details of the Local Plan Working Group can be found on the Council's website: <http://www.eastsuffolk.gov.uk/planning/local-plans/suffolk-coastal-local-plan/local-plan-review/suffolk-coastal-local-plan-working-group/>. The Local Plan Working Group helped to prepare the document, before it was considered by Scrutiny Committee on 27th November 2018. Following the Scrutiny Committee, the Final Draft Local Plan was considered by the Cabinet on 2nd January 2019 and then Council on 3rd January 2019. The windfall rate was included within the document considered at the Scrutiny, Cabinet and Council meetings.

- Scrutiny Committee:
<http://apps.eastsuffolk.gov.uk/committeeminutes/showagenda.asp?id=23214>
- Cabinet:
<http://apps.eastsuffolk.gov.uk/committeeminutes/showagenda.asp?id=23288>
- Council:
<http://apps.eastsuffolk.gov.uk/committeeminutes/showagenda.asp?id=23280>

Appendix 2 - Consultation Response: Suffolk Coastal District Council Final Draft Local Plan from Ian Cowan, February 2019

Original Document - Summary / Overall Conclusion / Recommendation (1-50 pages)
Section - Historical Jobs Creation (Pages 10-13 of 50)

The 2013 Plan envisaged a need for 7,900 / 11,000 new houses based on an expectation that 8,000 jobs would be created over its lifetime. Table 6.2 Monitoring Framework Paragraph 4 stated: *“From 2001 – 2027, to facilitate the creation of at least 8,000 new jobs including providing for no less than 8.5 hectares of new employment land to meet the current and predicted economic needs of the District.”*

Note: In contrast to the 2013 Plan, where 27.35% less land was required for 23.08% more jobs, the Draft Plan envisages a far more extravagant 11.7 hectares for only 6,500 jobs! The comparative land requirements per employee being 10.63 and 18.00 square metres respectively.

When any conscientious organisation produces an economic forecast it is prudent to periodically measure its success against actual events, and SCDC would be expected to carry out such an exercise before putting the Draft Plan out for consultation.

Therefore, on 16 November 2018 I contacted SCDC's FOI Team and asked: *“Various iterations of the Local Plan of 2013 envisaged the creation of 8,000 new jobs over its lifetime. Presumably, in order to measure the success of these job-creation aspirations, SCDC have been prudent enough to keep track of actual new job numbers. Therefore would you please tell me: (a) how many new jobs have been created in the District between 2001 and 2017 and (b) how many of these jobs were located in Felixstowe.”*

On 29 November 2018 they replied as follows: *“The Planning Policy team creates a monitoring report [Authority Monitoring Report] on the Local Plan each year, available on the Council website.”*

The reports go back to 2005. The employment figures found in the reports are taken from the Suffolk Observatory. The location of the jobs created is not available.”

The following figures have been extracted from the “Economy” sections of the Authority Monitoring Reports from 2013-14 to 2016-17 -

Table 3	2015	2014	2013	2012	2011
Total jobs	49,000	49,100	46,100	46,000	46,000

Note: The Total Jobs figure means employees and excludes agriculture and the self-employed.

As can be seen, it would appear that 3,000 jobs were created between 2011 and 2015. Rather improbably, they all arose in 2014! This is also a surprisingly “round” figure, which indicates no more than vague estimation. The Authority Monitoring Report 2016-17, which was the most recent document referred to by SCDC, only gave Total Jobs figures up to 2015, and no jobs figures were given in Authority Monitoring Reports prior to 2013-14.

Therefore, I made a follow-up request the same day: *“Thank you for this. Unfortunately, these documents prior to 2013/14 do not give me the figures I am looking for which, in later years appear in a Table entitled “Jobs, earnings and unemployment.” Can these figures be obtained from another source? From a study of the information presented, the*

only year that stands out is 2013/14 where a total of 3,000 jobs seem to have been created. From your records, can you please tell me where the bulk of these jobs arose? Also, can you confirm that the "Total employee jobs" in these Tables are nett of job losses?"

The FOI Team responded on 13 December 2018: "In 2016, the Council along with neighbouring authorities of Ipswich, Babergh and Mid Suffolk commissioned Lichfields to undertake a Sector Needs Assessment of the area. The findings of this were published in September 2017 and have been available on the Local Plan pages of the Council's website since. The most relevant document to address this enquiry can be found [in the Ipswich Economic Area Sector Needs Assessment Final Report, dated September 2017]. Table 2.2 on page 11 shows the total employment in the district and the number of jobs created between 2001-2016. The source of these figures is from the East of England Forecasting Model. In respect of distribution of jobs – the document provides information relating to this in Table 2.3 on page 15 as well as in figure 2.12 on page 23. Figure 2.12 is supported by a variety of individual maps in other parts of the document but essentially provides the location of businesses, the sector they operate within and the number of jobs in each location. The source and the information of these maps is the Inter Departmental Business Register (2016)."

Table 2.2 from the Ipswich Economic Area Sector Needs Assessment Final Report shows –

Location	Total Employment (2016)	Absolute Change in Total Employment 2001-2016	% Change in Total Employment 2001-2016
Babergh	40,030	+3,150	+8.5%
Ipswich	78,830	+5,330	+7.3%
Mid Suffolk	45,190	+720	+1.6%
Suffolk Coastal	61,500	+7,250	+13.4%
Ipswich Economic Area	225,500	+16,400	+7.9%
New Anglia LEP	792,870	+71,480	+9.9%

This Table shows a "Total Employment" number at a specific point in time which is considerably in excess of the Authority Monitoring Report figure for 2015 of 3,000 new jobs. Presumably, the 61,500 includes agricultural jobs and the self-employed, and is not a like-for-like comparison with the figures in the various Authority Monitoring Reports, which specifically exclude agricultural jobs and the self-employed. Therefore, the supposed Absolute Change in Total Employment of +7,250 people can not be relied on as a measure of jobs created between 2001 and 2016, nor can the 3,000 in the Authority Monitoring Report. Therefore, this Table has not answered the specific questions asked by me on 16 and 29 November 2018. The other references are even less informative and have not been reproduced: (a) Table 2.3 of the Authority Monitoring Report shows the total number of businesses by sector in 2016 and (b) Figure 2.12 is a barely legible map which appears to show clusters of employment within various business categories. Note: The District Wide Statistics on Page 9 of the Draft Plan show a total population of 127,836 in 2016 including "Economically Active" people totalling 82.7% of residents

between the ages of 18 and 64. The number of people between the ages of 18 and 64 are not given. According to the UK Office For National Statistics, the 2017 population was 129,016, of which 69,775 were between the ages of 18 and 64. If 82.7% of these people were “Economically Active” this amounts to only 57,703.

On 14 December 2018 I wrote again to the FOI Team: *“Thank you for this. However, two points have not been answered - From a study of the information presented, the only year that stands out is 2013/14 where a total of 3,000 jobs seem to have been created. From your records, can you please tell me where the bulk of these jobs arose? Also, can you confirm that the "Total employee jobs" in these Tables are nett of job losses?”*

They answered both questions on 17 December 2018: *“We do not hold the specific information you have requested, only the information we have supplied.”*

As can be seen, the statistics provided in the various Reports referred to by SCDC's FOI Team have not answered any of my questions: (a) *How many new jobs have been created in the District between 2001 and 2017?* (b) *How many of these jobs were located in Felixstowe?* (c) *Can these figures [prior to 2011] be obtained from another source?* (d) *Can you please tell me where the bulk of these jobs [3,000 in 2014] arose?* (e) *Can you confirm that the "Total employee jobs" in these Tables are nett of job losses?*

If SCDC planners do not know the answers to basic questions relating to the District's economic health this inevitably casts doubt on the assumptions, estimates and predictions in the Draft Plan.

The FOI Team's claim not to hold information regarding whether or not the figure for jobs created is gross or nett of jobs losses is particularly worrying. When I asked a similar question regarding the 6,500 jobs expected over the lifetime of the Draft Plan I was told by a senior planner at SCDC: *“The figures within the evidence base documents include the figures from the forecasting models and these are gross figures.”* This matter is discussed in detail below at **A Highly Misleading Figure**.

To add to uncertainties regarding jobs numbers, Paragraph 4.4 of the Draft Plan states: *“Evidence prepared identifies that between 2001 and 2016, employment grew by 13.4% in Suffolk Coastal and the District is expected to see an increase in the number of jobs over the Local Plan period to 2036. Suffolk Coastal has economic ambitions and the Local Plan sets out how the main economic drivers in the District can be supported, as well as providing the opportunities and conditions for small enterprises to start and flourish in the District and create better, higher paid employment.”*

This statement may refer to NOMIS Official Labour Market Statistics, which show that at July 2018 a total of 60,300 people were economically active, including: (a) 46,000 employees (b) 12,500 self- employed and 1,500 unemployed.

Of the people in employment within the District, according to NOMIS, the following categories are of interest: (a) Manufacturing 3,000 (b) Wholesale and Retail, Repair of Motor Vehicles - 7,000 (c)

Transportation and Storage - 8,000 including, presumably, the 2,500 people directly employed at the Port (d) Accommodation and Food Services - 5,000 (e) Information and Communication - 4,000, including, presumably, the 3,000 people directly employed by BT

/ Adastral Park (f) Professional, Scientific and Technical - 3,000 including, presumably, the 520 people directly employed by EDF at Sizewell (g) Administrative and Support Services - 2,000 (h) Public Administration and Defence, Compulsory Social Security - 2,000 (l) Education - 4,000 (j) Human Health and Social Work - 5,000 (k) Arts, Entertainment and Recreation – 1,500.

Conclusion – Historical Jobs Creation: If 8,000 jobs were to be created between 2001 and 2027, using simple arithmetic it is arguable that almost 5,000 should have been created by 2017, and SCDC would have been able to proudly boast about the effective implementation of the 2013 Plan. They have not done so, either because: (a) they don't know the numbers or (b) the reality is considerably less than the prediction. If 5,000 new jobs had actually been created, this would have provided a firm basis for the jobs creation aspirations in the Draft Plan, of 6,500 new jobs between 2018 and 2036. This figure is 720 fewer jobs than were predicted to arise between 2016 and 2036 in the First Draft Plan of July 2018. There is a statutory obligation to give correct answers to Freedom of Information Act requests, which means that the information supplied by or referred to by SCDC's FOI Team must contain the most complete and up-to-date statistics available. Disturbingly, based on their replies to me, SCDC don't know: (a) how many jobs were created between 2001 and 2010 or after 2015 (b) where these jobs were created (c) why and where 3,000 jobs appear to have been created in 2014 (d) why no jobs appear to have been created in 2011, 2012 and 2013 (e) why there appears to have been a net loss of jobs in 2015 (f) how many jobs were created in Felixstowe or (g) whether any of these supposed new jobs are net of job losses. (Regarding this last point see **A Highly Misleading Figure** below.) Therefore, since SCDC are unable to provide substantive evidence of jobs created in the District, net of jobs losses, between 2001 and 2017, it logically follows that there is no sound historical basis to support the Baseline Jobs Growth of 6,500 new jobs between 2018 and 2036. If jobs growth figures can not be substantiated with credible historical evidence, logically this also means that the Residual Housing Need Requirement must also be unsound.

