

Matter 2: Issue A – Housing Provision – Ian Cowan Response

2.1: Are 542 homes justified

2.1(a): The need for 582 homes is misleading, as it fails to take account of Windfalls.

2.1(b): Three overarching issues must be considered first: (a) the requirement to update the housing needs evidence (b) sustainable transport infrastructure and (c) the relationship between jobs and houses.

2.1(c): Housing Needs Evidence: The 2013 Plan required production of an “Issues and Options” document by 2015 including: *“Updated [housing needs] evidence, not least in the form of information from the 2011 Census”*. This requirement was ignored by the Council then dismissed in the 2016 examination of the Felixstowe Peninsula Area Action Plan. The figures are shown in the Appendix.

2.1(d): The Felixstowe/Trimleys population has remained static since 2001, confirming a lack of need for housebuilding on the Peninsula. Any incidental need has been and will be fulfilled by Windfalls.

2.1(e): The need for 542 houses can only be sound by: (a) reducing the number of houses erroneously allocated to Felixstowe/Trimleys and (b) making an accurate Windfalls assessment.

2.1(f): Sustainable Transport Infrastructure: Plan comments confirm a lack of economic growth until the A12, A14, Orwell Bridge and Northern Link Road are completed, which will not happen until the end of the Plan period, if at all. See Appendix.

2.1(g): Comments, from ipswichnorthernroute.org.uk reinforce the Plan warnings. See Appendix.

2.1(h): Jobs And Housing: Without 6,500 jobs, the adult inhabitants of the 10,476 new houses will be unemployed. Fewer jobs means: (a) fewer people moving to the District with (b) fewer homes needed. There are many reasons why these aspirations will never be reached. See Appendix,

2.1(i): Because 6,500 jobs will not be created there is no need for thousands of houses and growth will not be sustainable until there are significant roads infrastructure improvements. These factors are The Elephants In The Room during most Matters and Issues, and are summarised in the Appendix.

2.1(j) – Exceptional Circumstances / Market Trends / Soundness: Housing numbers cannot be credible until needs evidence is updated, especially for Felixstowe/Trimleys, where the population has been static since 2001. Jobs growth will be unsustainable without road infrastructure improvements. Since there will not be 6,500 jobs, there is no need for: (a) housing allocations anywhere and (b) new housing in Felixstowe/Trimleys. Building 582 houses annually on farmland is irresponsible and unsound. The Plan statement that growth is not currently achievable reinforces Paragraph 60 of the NPPF: *“Exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.”* Specific market signals that must be taken into account include: (a) 6,500 jobs will not happen (b) the failure to develop 2,000 houses at Brightwell Lakes and (c) Uniserve's abandonment of their Super Distribution Centre at the Port. This means there will be no need for substantial housing allocations. Therefore, why does the Council want to build these houses in view of their own Paragraphs 2.15 and 2.16? Plus, as per 2.3 below, if Windfalls were properly accounted for there is zero need for allocations.

2.2: Implications of 2014 projection

2.2(a): The lower 2014 figure more accurately reflects government policy! But, as per Plan

Paragraphs 2.1 and 2.3, the 2014 calculation is wrong anyway and no allocations are required! In addition, The Elephants In The Room are once again engaged.

2.2(b): In the Plan and the Council's reply to the Inspector's letter of 16 May, much is made of the need for a contingency over and above the allocated housing numbers. The reply claims this is to: *"Maintain the Council's ambitions to boost the supply of housing to meet wider aims ... providing confidence that development that comes forward will be plan-led, as per paragraph 15 of the NPPF"*. I have searched the Plan for the phrase *"wider aims"*. It cannot be found!

2.2(c): Paragraph 15: *"The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities."*

2.2(d): As per Planning Portal Glossary, a plan-led system is: *"The principle that the decisions upon planning applications should be made in accordance with the adopted development plan, unless there are other material considerations that may indicate otherwise."*

2.2(e): The Plan does not provide: (a) *"a positive vision for the future"* and (b) *"a framework for addressing housing needs and ... economic priorities"* because the 6,500 jobs will never materialise and there will be no need for 582 or even 515 dwellings every year!

2.2(f): This contingency excludes Windfalls of 800 dwellings over the Plan period. Based on FOIA inquiries, this figure is grossly underestimated. A more reasonable figure could be 200 dwelling per annum. This would substantially: (a) increase the contingency and/or (b) reduce the need to allocate unnecessary houses to farmland.

2.2(b) – Soundness: A system that is *"plan-led"* assumes that the Plan is sound. This is not the case with housing numbers and contingencies. Projections will only be sound if they reflect government policy. This comes with a huge *caveat*, as explained during the Climate Change session with regards to Paragraphs 8 and 60 of the NPPF, not to mention The Elephants In The Room.

2.3: Windfalls justification

2.3(a): Given known historical and future numbers, clearly: (a) the claim that Windfalls *"will come forward across the District at a rate of 50 dwellings per year"* is a gross understatement (b) there is no justification for this figure and (c) Windfalls are not a contingency, but a major contributor to past and projected housing growth.

2.3(b): I have been given conflicting statements which undermine the credibility of the Windfalls numbers provision. See the Appendix for the complete exchange of correspondence with Philip Ridley, Head of Planning and Coastal Management.

2.3(c) – Soundness: The figure of 50 Windfalls per annum is grossly understated and by increasing this figure based on historical actuals and known future expectations, substantial areas of farmland will be saved. Soundness depends on an honest re-evaluation of Windfalls numbers based on: (a) the actual figures shown in my Table 4 and (b) the figure included in Outstanding Planning Permissions.

2.4: Clarity / Effectiveness of SCLP2.1

2.4(a): The intentions are clear: (a) create *"at least"* 30,320 jobs, plus 5,000 jobs in Waveney and (b) deliver *"at least"* 37,328 dwellings. This will be done by working *"actively with other local planning authorities in the ISPA and with Suffolk County Council to co-ordinate the delivery of development."*

2.4(b): Jobs creation means businesses setting up, expanding and relocating, which depends on economic circumstances beyond the control of Local Authorities, no matter what policies are proposed or how they attempt to “*co-ordinate delivery*”.

2.4(c): Based on considerable evidence, it is clear that 6,500 jobs will never be created over the lifetime of the Plan. The reasons are numerous, have been stated before, but merit repetition because of The Elephants In The Room.

2.4(d) – Soundness: SCLP2.1 is clear but flawed. An “*intention*” to create thousands of jobs is commendable. However, neither the District nor the ISPA can influence or control this creation. SCLP2.1 is sound regarding aspiration, but unsound regarding implementation. Since it cannot be partially sound it is therefore unsound. Soundness will only be achievable when its practical limits are spelled out.

2.6: A 5 year housing supply

2.6(a): As explained elsewhere: (a) because few, if any, jobs will be created there is no need to build thousands of houses (b) the housing needs figure is understated by the exclusion of any Windfalls and (c) the annual Windfalls figure is grossly understated.

2.6(b) – Soundness: Until there is an accurate calculation of genuine housing needs, taking proper account of jobs and Windfall numbers, there is no point in calculating the Five Year Housing Supply.

2.7: Realistic housing numbers

2.7(a): The number of completions has little influence on proposed allocations, except regarding Windfalls.

2.7(b): Realism and achievability are less relevant than need. Because few, if any, jobs will be created there is little need for new homes, and any that are necessary will be fulfilled by Windfalls. Once again, The Elephant In The Room is engaged!

2.7(c) – Soundness: Strictly speaking, the answer is “Yes”, but as stated elsewhere there is no need for homes to be allocated other than those covered by Windfalls.

2.8: Delivery realistic and justified

2.8(a): The trajectory is shown at Plan Appendix D in: (a) a Chart showing allocations and (b) a Graph showing houses from all sources. None of the years in the Chart have been totalled, which makes understanding difficult. According to my own arithmetic, Allocations between 2018 and 2036 are 5,394 units (purple on Graph). The Graph on Page 496 totals 11,720 units from all sources. Confusingly, part of the North Felixstowe Garden Neighbourhood allocation is included in Outstanding Planning Permissions.

2.8(b): Neighbourhood Plan Allocations supposedly appear on the Graph in green. However, these are invisible and assumed to be Nil!

2.8(c): Windfalls are shown in pink, at only 50 per year. However, there are 2,840 Windfalls hidden within the 3,609 Outstanding Planning Permissions.

2.8(d): Outstanding Planning Permissions (yellow) tail off around 2023-24, being replaced by Allocations (purple) totalling 5,394 units.

2.8(e): Since actual Windfalls are considerably more than 50, it can be concluded that: (a) they will continue to exceed 50 and (a) a more reasonable estimate is 200. Therefore, Windfalls between 2024-25 and 2035-36 could total 2,400 units rather than 600, and should be subtracted from rather than added to allocations.

2.8(f): Repeating Philip Ridley's comment: *“Using a larger allowance for windfall, in place of site allocations ... would be fundamentally flawed and lead to a continually larger number of units being delivered on sites which are not allocated. ... This would also pose further issues in respect of uncertainty for the local community based on sites that may or may not come forward as well as challenges for infrastructure provider and demands on their services. ... If the windfall figure were increased alongside the inclusion of site allocations as contained in the emerging Local Plan, this would increase the contingency identified in the Plan but not necessarily increase the number of dwellings coming forward as windfall.”*

2.8(h): The District has lost control of planning by allowing average Windfalls of 421 per annum in recent years as well as an average of 473 in the next few years.

2.8(i) – Soundness: No matter what the Plan requires, the Council has been and continues to be unable to control the granting of planning permissions for Windfalls. Since it did not adhere to the 2013 Plan of 50 per year, there is no confidence they will stick to the current Plan of 50 per year. This makes its ability to adhere to the housing trajectory doubtful. Because of its understatement of Windfalls, the trajectory is neither realistic nor justified, and can only be made sound when more accurate figures are incorporated. This also engages The Elephants In The Room.

2.9: Windfalls

2.9(a): Inevitably and logically, Windfalls have been covered above. To repeat: (a) the average annual Windfalls in the five years to March 2018 was 421 and (b) the average number in the next six years will be 473. It is reasonable to conclude that Windfalls in the years beyond 2023-24 will continue at a high level. At a conservative estimate, a figure of 200 Windfalls per annum is more realistic.

2.9(b) – Soundness: The obvious answer is that a figure of 50 is unjustified, unsound and not realistic. Soundness requires figures which accurately reflect known historical and future data.

Matter 2: Issue C – Growth / Settlement Hierarchy – Ian Cowan Response

2.17: SCLP3.1 Growth strategy

2.17(a): An “ambitious” Plan must also be realistic. “Supporting and facilitating” does not necessarily mean “achieving”. The claim that the Council “will deliver” growth misrepresents their ability to do so. Just because 11.7 hectares of land is set aside does not mean 6,500 jobs will be created, and thousands of people will move here to fill non-existent vacancies.

2.17(b): The 11.5 hectares is a serious understatement, because more than 116 hectares has also been allocated for Innocence Farm.

2.17(c): The creation of 6,500 new jobs is aspirational, if not delusional. As stated elsewhere, but worth repeating, this figure will never be created because of The Elephants In The Room.

2.17(d): SCLP3.1's growth will be achieved by: “Significantly boosting the supply of housing ... through the delivery of 582 new dwellings per annum”. This confirms the link between jobs and housing, but fails to recognise economic realities: (a) jobs will not be created just because land is set aside (b) nor will they be created because houses are allocated and (c) people will not relocate in large numbers unless jobs already exist. This illustrates the “chicken and egg” causality dilemma, whereby there will be no need for new housing until jobs are created in large numbers!

2.17(e) - Soundness: The “Strategy For Growth” risks the destruction of farmland for jobs that will not materialise and houses that are not needed. If significant numbers of jobs are created it will not be until there are “improvements to the A12 and A14” plus “a northern route around Ipswich” - The Elephants In The Room are once again engaged. No houses will be needed until evidence of jobs creation emerges. SCLP3.1 will be unsound until: (a) jobs numbers and timings are evidence based (b) there is a realistic estimation of housing needs and (c) Windfalls accurately reflect actuals.

2.19: Distribution of housing

2.19(a): Table 3.5 of the Plan presupposes that the annual allocation of 582 homes is realistic. But District-wide deliverability must be considered before their allocation to individual locations.

2.19(b): Although the Inspector's “Matters, Issues and Questions” appears to contain different topics, many of them refer to the same things and merit the repetition of answers already given. Once again, the The Elephants In The Room are engaged.

2.19(c): Specifically, the allocation of 4,028 (3,252 + 671 + 105) houses to Felixstowe/Trimleys is unrealistic and not justified. The main reasons are set out in the Appendix.

2.19(d): Simple arithmetic demonstrates the folly of this housing allocation. A population increase of 9,081 will mean that almost 94% of jobseekers will live in and commute from Felixstowe/Trimleys. See Appendix for my calculation.

2.19(e) – Soundness: Housing distribution cannot be sound until housing requirements are properly evaluated, taking realistic job creation figures into account. Housing distributions at Table 5 must also be unsound. The only way to make local deliverability sound is to first make District-wide deliverability sound.

Matter 2: Issue D – Economy – Ian Cowan Response

2.22: New employment land above baseline

2.23: Assessment accounted for losses

2.22/2.23(a): Questions 2.22 and 2.23 do not need to be specifically answered given The Elephants In The Room.

2.22 / 2.23(b) – Soundness: The Elephants In The Room cannot be referred to often enough. Few, if any, jobs will be created and it follows that both: (a) the area of employment land in relation to the baseline and (b) accounting for losses through redevelopment are neither “*effective*” nor “*justified*” and are unsound through irrelevance.

Matter 2 – Appendix – Ian Cowan

The Elephants In The Room -

1. FOIA correspondence confirms there is no evidence that sufficient numbers of jobs have already been created to support the Plan's aspirations.
2. If any jobs are created, they will “*predominantly*” arise in employment categories that will not provide sufficient numbers to come anywhere near the total aspiration, nor will many of these employees be able to afford “*market value*” homes.
3. These jobs are identified at Paragraph 3.17 in the Plan as being: “*service, tourism, business and professional services*”.
4. Jobs will not arise at the three major employers, namely the Port of Felixstowe, BT/Adastral and Sizewell.
5. In addition, their description as “*key economic drivers*” is meaningless with regards to future economic impact.
6. The jobs figure is gross, and takes no account of future jobs losses. If jobs numbers have been calculated elsewhere on the same basis, they have also failed to take account of losses.
7. Specifically, jobs will be lost at the Port and BT/Adastral.
8. Businesses continually strive for economies of scale, including rationalisation and redundancies, a prime example being the amalgamation of SCDC and Waveney.
9. Specific market signals include the lack of progress at the 2,000 homes housing development at Brightwell Lakes and the abandonment of the Uniserve Super Distribution Centre at the Port.
10. No account has been taken of jobs losses through the implementation of robotics and artificial intelligence. The Heatmap on Page 15 of my Consultation response indicates that considerable numbers of jobs could be lost.
11. Micro/Small/Medium Businesses will have an insignificant impact on jobs growth.
12. According to Paragraphs 2.15 and 2.16 of the Plan, growth will not be sustainable until there are significant improvements to the A12, A14 and Orwell Bridge and the Northern Ipswich bypass has been completed.

2.1(c): Housing needs figures -

1. The Census showed that the population of Felixstowe/Trimleys had decreased between 2001 and 2011, against the District trend, thus confirming there was no need to allocate any houses in either the 2013 Local Plan or the 2016 Felixstowe Plan.
2. According to the Office for National Statistics, the population of Felixstowe/Trimleys had increased by only 1.90% between 2001 and 2017, compared to a District-wide increase of 11.96%.
3. A total of 662 Windfall houses had been built in Felixstowe/Trimleys between 2005 and 2018, including 317 since the publication of the 2013 Plan. This more than fulfilled local needs.

2.1(f): Sustainable Transport Infrastructure: One -

1. Page 22 of my Response: “*Traffic congestion on roads around the District, including the A12, A14 and Orwell Bridge, is not only a continuing inconvenience to current businesses but is also a specific disincentive to large scale Inwards Investment by new or expanding businesses.*”
2. Paragraph 2.15 of the Plan: “*The provision of new and improved infrastructure is essential to ensure that the growth planned across the area is sustainable. Planning for infrastructure across the area will include ... sustainable transport measures, improvements to the A12 and A14, improvements to other parts of the road networks and the railways*”
3. Paragraph 2.16: “*A northern route around Ipswich is expected to be needed to enable*

growth in the longer term. The route would improve connectivity between the A14 and A12, reducing pressure on the A14 and improving network resilience, especially near the Orwell Bridge and Copdock interchange.”

2.1(g): Sustainable Transport Infrastructure: Two -

1. *“In order to support growth in the longer term whilst also supporting the existing communities, residents and businesses in Suffolk, we need to consider carefully the infrastructure that may be needed.”*
2. *“[The northern bypass] is needed to improve existing journeys, support the local economy, and provide capacity for future growth.”*
3. *“In 2016 an initial study was undertaken to look at transport conditions across the wider Ipswich area, both now and in the future. This work showed that the road network suffers from frequent and severe delays, constraining growth and reducing productivity. In particular, the work highlighted issues of congestion on the A14. ... It also identified problems relating to the Orwell Bridge crossing and traffic in Ipswich, impacting on nationally important assets such as the Port of Felixstowe.”*
4. *“Further work has ... identified a new road as the most effective way to facilitate growth and deliver transport improvements.”*
5. *“The earliest a new road could be delivered would be 2027.”*
6. *“It will ease congestion and improve resilience and open up the potential for future growth by providing more reliable journeys for businesses, visitors and residents.”* This web site is a partnership of Ipswich, Suffolk County, East Suffolk, West Suffolk, Mid Suffolk and Babergh Councils, combining the weights of their communal opinions. Additional jobs and homes will not be deliverable until at least 2027, and given the planning, financial, compulsory purchase and other hurdles that must be overcome, this is a highly optimistic date.

2.1(h): Jobs and housing -

1. There is no evidence of large-scale historic jobs creation, as predicted in the 2013 Plan.
2. The 6,500 is gross and does not take account of jobs losses.
3. It fails to recognise the future impact of automation or economies of scale.
4. In particular, it is probable that, due to automation, jobs will be lost at the Port of Felixstowe.
5. Jobs losses have already been announced at BT/Adastral.
6. No new permanent jobs will be created at Sizewell.
7. Any jobs created in Micro/Small/Medium Sized businesses will not be in significant numbers.
8. For many reasons there will be very little inwards investment.
9. There will be no growth until there are improvements to the A12, A14 and Orwell Bridge and a Northern Bypass has been completed.

2.3(b): Windfalls – Correspondence with FOI Team and Philip Ridley.

1. On 6 June 2019, in answer to FOI Request 121230588, the Council's FOIA Team stated: *“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 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 of the Final Draft Local Plan.”*
2. On 10 June I wrote to Philip Ridley,: *“It is difficult to understand how “continual monitoring” of dwellings constructed, as per the figures noted above, results in the conclusion that a mere 50 dwellings per year is an “appropriate figure” for the whole District. ... Would you please ... give a clear explanation or calculation as to why “constant monitoring” of Windfall housing numbers have resulted in the conclusion that only 50 dwellings per year is an*

- "appropriate figure" when compared to known averages."*
3. He replied on 10 June: *"There is no specific calculation which determines the figure of 50 windfall dwellings per year. The Core Strategy introduced the allowance of 50 dwellings per year to acknowledge that windfall developments do come forward within the District."*
 4. Philip Ridley's statement that *"there is no specific calculation"* contradicts the FOI Team claim that: *"Historic monitoring evidence shows that 50 dwellings per year (total of 850 over the plan period 2010-2027) is an appropriate figure."* In other words, there is nothing to substantiate this figure, which, on its own, confirms unsoundness.
 5. Philip Ridley quotes Paragraph 70 of the NPPF: *"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."* There is *"compelling evidence"* from the figures obtained by me that Windfalls will continue to provide a *"reliable source of supply"* that considerably exceeds 50 units per annum.
 6. He also states: *"The number of completions on windfall sites is expected to reduce as the plan is implemented."* This statement is nonsense: (a) as per my Table 4, Windfalls have shown a steadily increasing annual pattern from 2005 onwards and (b) of the 3,609 Outstanding Planning Permissions, 2,840 (78.69%) are Windfalls!
 7. He continues: *"Using a larger allowance for windfall, in place of site allocations ... would be fundamentally flawed and lead to a continually larger number of units being delivered on sites which are not allocated."* Philip Ridley appears not to know that this is actually happening! By granting planning permissions over many years to large numbers of Windfall homes: (a) the District Council have conducted a policy that is *"fundamentally flawed"* and (b) by ignoring *"compelling evidence"* regarding known Windfalls patterns and making future allocations instead, the Plan regarding Windfalls is also *"fundamentally flawed"*.
 8. Regarding a larger Windfall allowance, he says: *"This would also pose further issues in respect of uncertainty for the local community based on sites that may or may not come forward as well as challenges for infrastructure provider and demands on their services."* Ironically, the Council's policy of allowing so many Windfalls has already contributed to *"uncertainty"* and *"challenges"* and will continue to do so unless proper control is exercised.
 9. He further states: *"If the windfall figure were increased alongside the inclusion of site allocations as contained in the emerging Local Plan, this would increase the contingency identified in the Plan but not necessarily increase the number of dwellings coming forward as windfall."* This ignores the blindingly obvious: Instead of including Windfalls *"alongside"* allocations, they should be included instead, thus avoiding the need for permanent destruction of farmland!

2.19(c): Allocation of houses to Felixstowe/Trimleys.

1. It is unfair for 35.43% of the District's total housing contribution to be allocated here.
2. The fictional concept of a *"garden neighbourhood"* is not part of the NPPF.
3. The Colneis Peninsula is already short of doctors and dentists, and more people will only make things worse.
4. There is a greater need for houses where prices are significantly higher, including Aldeburgh and Woodbridge.
5. The population has been virtually static since 2001.
6. Few, if any, jobs will be created on the Peninsula.
7. Jobs at the Port will be lost.
8. No employment land has been allocated on the Peninsula.
9. New residents will have to commute elsewhere, thus exacerbating the existing A12, A14 and Orwell Bridge problems.

2.19(d): Population and jobseekers

1. A density of 2.2 people per household means a population increase of 9,081. (4,128 x 2.2)
2. If 67.1% are economically active, 6,093 people will be looking for jobs. (9,081 x 67.1%)

3. This means – ludicrously – that 93.74% of new jobseekers throughout the District will live in Felixstowe/Trimleys. (6,093 / 6,500 x%)