Dear Annette

I’d be grateful, on behalf of KATCAG, if you could pass this email on to the Inspector. I should say at the start that we are not introducing any new evidence. This said, we do feel time limitations at the Hearing resulted in several important topics being skated over and consider a further Hearing Day to be justified. Accordingly, we respectfully ask the Inspector to provide an opportunity for all interested parties to attend a further Hearing Day, so the evidence presented to the Hearing can be validated, or otherwise. To justify this request, may we make the following observations:

The Inspector will recall Day 2 of the Hearing (21st August, 2019) when the afternoon Session addressed Matter 2, Issue D. During this Session, the Council stated their employment land requirement at Innocence Farm is driven solely by the needs of the Port of Felixstowe, claiming just under 30% of the Port’s incoming traffic is unloaded within 30 miles of the Port. This evidence was refuted by Mr Andrew Cann, on behalf of KATCAG, who stated the actual figure was closer to 1%.

Subsequently, KATCAG formed the view Policies SCLP12.35.12.66 & 12.67 would be fatally undermined if Mr Cann was correct and the Council’s claim was shown to be untrue.  It would demonstrate there is no demand for this prime agricultural land to be sacrificed. Accordingly, we lodged a Freedom of Information request designed to elicit where these warehousing activities are taking place currently.  You were sent a copy.

At the afternoon session on 5th September, it was claimed by the Council and Bidwells there are several commercial entities interested in occupying Innocence Farm, were the land to become available.  As stated in evidence to the Hearing, these claims conflict directly with the Port’s actual experience over a significant number of years.  It was stated by Mr Gibson that the most recent construction of a warehouse at Felixstowe was in 1993. He observed that, over the subsequent 26 years, no fewer than 12 warehouses and transit sheds have been demolished on the Port yet records, including those provided by Lichfield, show the Port to continue to record continuous growth. His point being there is no correlation whatsoever between the throughput of the Port and a requirement for warehousing on the Felixstowe Peninsular. He noted also the failure of the already consented 1.4M sq ft Port of Felixstowe Logistics Park to attract a single tenant in the past 5 years, despite a sustained marketing campaign. It was further observed in evidence that farmland locations, such as Clickett Hill, that have been consented brownfield sites for several years, but have also failed to materialise.

Mr Gibson, noting there are already well in excess of 100 acres of consented schemes on the Felixstowe Peninsular, questioned the wisdom of constructing local warehousing, given the emerging national demand from the online (business–to-consumer) sector. He went on to say the Council was urged by way of feedback on the 16th of March 2018, (being the day after the Port of Felixstowe Growth and Development Needs Study – Stakeholder Event), to consider two important elements if the hinterland development needs were to be fully established and understood. These were as follows:

* The property industry view on warehouse demands (both spec-build and built to suit). There are several published research papers available documenting the supply & demand position.
* A greater understanding of the changing needs of the supply chain from the perspective of the logistics providers, particularly the emergence of e-commerce and the impact online sales have had on the industry. Studies on how the picture is changing are available from the Trade & Industry Associations.

Despite being invited to attend this meeting, as a stakeholder, to provide feedback, there is no evidence from the final Needs Study to suggest any of Mr Gibson’s points were taken into consideration.

Indeed, our own soundings of company executives erecting 144,000 square feet of new warehousing at Port One in Great Blakenham, on behalf of the FDS Corporation, an online Chinese retailer, suggest they would not seriously consider developing a site east of the Orwell Bridge, blighted as it is from the numerous outages and periods of inactivity that frequently take place, rendering this ‘Pinch-Point’ and the whole of the Felixstowe Peninsular too prohibitive for time-sensitive supply chains. The Port One Logistics Park consists of 60 acres of development land. A similarly sized site is also available, and attracting interest, at the former sugar beet factory in Sproughton Road.

It is probable both the Council and Bidwells were aware of these two developments, which are in direct competition with Innocence Farm, but disappointing that neither thought fit to mention their existence. It follows any enquiries to East Suffolk Council are likely to be no more than “due diligence” assessments of the overall position facing a prospective developer. However, this needs a proper examination by the Inspector.

It was noted that the Inspector asked the Council if the proposed Innocence Farm development had been the subject of a Masterplan. It would appear from the Council’s answer that this has not been undertaken and therefore throws into doubt the overall viability of the proposal.

With his in mind, we submitted a second Freedom of Information request that sought to establish the status of any enquiries received by the Council, but in a format that would not breach any company’s commercial privacy.

The Council’s reply to each of these requests appears below.  As expected, the council’s acceptance of any need on the part of the Port is based solely on ‘hearsay’ arising from a meeting of the Port Users Association (portrayed as the ‘Stakeholders’), referred to above. We can trace no evidence of the Port saying Innocence Farm is ‘needed’, other than a carefully crafted statement making clear any ‘need’ would be to service a “trade-related” requirement, as opposed to the specific needs of the Port of Felixstowe.

The Council’s reply to our second FOI request attempts to do little more than justify the obfuscation surrounding this question. We continue to know nothing about the type or status of any enquiries the Council says it has received. Indeed, the FOI question posed has been wholly ignored. Instead, the Council has focussed on the issue of privacy, which we had taken fully into account when submitting our FOI Request!

It seems to us both of KATCAG’s FOI requests highlight major concerns affecting the soundness or otherwise of Innocence Farm, but were either not discussed at the Inquiry or came to light after the hearing sessions were completed. In the light of the above, KATCAG continues to urge the Inspector to reconvene a session to examine their implications in detail by hearing evidence from interested participants to determine where the truth lies.