###### **Suffolk Coastal Local Plan Examination**

###### **Submission on Matter 3**

###### **Stephen Wrinch**

###### **Policy SCLP35: Land at Innocence Farm**

###### **Inspector’s Reference 3.47 - Justification**

###### Please consider the following key points –

###### There is little evidence of meaningful discussion between local authorities in respect of the proper utilization of employment land. It could reasonably be expected that regular minuted meetings should take place to address this important topic, but it would seem the meetings have either not taken place or have not been properly recorded. This, in itself, indicates the Draft Local Plan is **UNSOUND.**

###### The need to allocate Innocence Farm as employment land has been justified by the perceived needs of The Port of Felixstowe, as informed by the Lichfield Study 2018

###### The Port is, of course, a local business of huge importance and, as such, should be supported by Local Council initiatives wherever possible.

###### However, in whatever way others may choose to interpret the statistics, the Port’s management is probably better-placed than any other ‘expert’ to judge it’s future support needs

###### It is inconceivable the Port would fail to make clear any need for support that it has identified.

###### it is noteworthy the Port has been all but silent about the value of Innocence Farm to its future plans, despite the fact it would probably grasp any opportunity to future-proof its business, if it perceived any real benefit from expressing an interest in Innocence Farm

###### There is no evidence to suggest the Port endorses Lichfield’s claim that port-related warehousing schemes are required close to the Port.

###### This ‘perceived need’ appears more concerned with the aspirations of a large local landowner, Trinity College, and has little to do with a commercial demand

###### It is noteworthy little or no new warehousing has been developed in recent years, despite the granting of planning permission for two major warehousing developments

###### The above is compelling evidence there is **NO NEED** for Innocence Farm to be sacrificed in order to sustain or enhance the future viability of the Port of Felixstowe. Based, as it is, on the requirements of the Port, the Draft Local Plan is **UNSOUND** and all other soundness criteria become irrelevant. However, against the possibility the goalposts get moved, other points should be borne in mind as follows –

###### Lichfields offer no supported evidence for their claim / suggestion

###### *The Port will continue to grow on a ‘business as usual’ basis –* **Unlikely. This****point addressed already*.***

###### *That suitable sites / premises are made available for the Port to expand into port-centric logistics* ***–* no evidence offered to suggest that port-related activities require additional land.**

###### *Felixstowe could be linked to the servicing of offshore energy –* **demonstrably untrue as Felixstowe is not located in a suitable geographical position**

###### *There is a need for associated distribution centres –* **none planned and no evidence of any required.**

###### *There is a demand along the A14 for logistics space –* **no supporting evidence offered but, if there is a demand, there are approximately 180 Ha available right now, with suitable outline planning consent for port-related use.**

###### *25% of containers are moved by rail –* **Not true. The correct figure is close to 30% and is set to increase to 40% imminently. The requirement for road transport facilities is substantially overstated and declining, in relative terms*.***

###### *30% of containers are dealt with locally, off-port –* **wholly untrue! 1.2 million TEU ARE NOT handled locally (or even a small %age of this figure) yet it is the basis for the entire claimed warehousing and off-port land requirement**

###### To their credit, Lichfields do propose a rational, though possibly optimistic, assessment of the sectors where new jobs can be expected to occur and these are mainly the commercial and small manufacturing sectors who will be seeking to occupy business parks and small industrial units. This appears rational and, fortunately, there is adequate provision within the Draft Local Plan to accommodate this need.

###### There is some evidence of a minimal land requirement close to the Port. However, this would be to accommodate the needs of hauliers, currently being served notice to quit their existing premises within the Port. However, there is ample space available for development even closer to the Port than Innocence Farm.

###### During the last 10 years, the Port-Centric Logistics concept has been shown up as a myth. Felixstowe, in particular, has failed to secure the interest of potential developers. There is no evidence offered to suggest this has changed.

###### Whilst it is to be hoped the Port will continue to grow, the reality is that it is experiencing considerable competition from the London Gateway, Tilbury, Liverpool and Southampton.

###### Several services have left Felixstowe, preferring the facilities offered by alternative providers.

###### It is unlikely Felixstowe will continue to grow at it’s previous rate

###### it is no secret the Port’s owners are pursuing a de-manning policy

###### There is no evidence to suggest this strategy is inconsistent with business growth – rather the reverse, in fact

###### Viewed historically and in the context of employment land, there has been no additional port-related land use in the last ten years. There is no evidence offered to suggest this is likely to change.

###### Even were this not the case, the evidence base is deficient in terms of the Council’s knowledge of the number of jobs created previously or, indeed, whether their previous forecasting model has proven to be accurate.

###### It follows the Council’s assumptions about the **number of employment jobs** and, thereby, **the land requirement**, have not been justified and are therefore **UNSOUND** and the Draft Local Plan should be rejected accordingly.

###### **Inspector’s Reference 3.48 – 3.51 - Deliverability**

###### Please consider the following key points –

###### The Orwell Bridge is at capacity with no potential to increase its capacity

###### The case for Innocence Farm has been based on the ‘high growth’ scenario. The arguments above argue strongly there is no need for any additional employment land at all, so allocating land based on a high-growth scenario is **DEMONSTRABLY UNSOUND**

###### The site has few of the benefits attributed to it and several noteworthy problems –

###### It is surrounded by country lanes, all of which would require widening

###### The pollution impact of 3,000+ lorry movements on the local community is likely to be huge

###### The Trimley Primary School is essential to the needs of the Kirton and Falkenham communities and closing it, whilst mitigating the pollution impact to some extent, would give rise to equally serious concerns

###### The impact of light pollution would be considerable

###### Important wildlife habitats would be lost

###### Hundreds of acres of prime agricultural farmland would be lost, in contravention of the Government’s stated policies re. the retention of food-producing land

###### The proposed railhead is undeliverable on account of (i) the enormous cost and (ii) the availability of adequate space close to the railway line to the south of the A14

###### The number of proposed train movements could simply not be accommodated.

###### The allocation of employment land at Innocence Farm is **UNSUSTAINABLE**. There is no justification in terms of the need for this land and, if required, there are extant planning approvals elsewhere that would meet any possible need.

###### It follows the Draft Local Plan is **UNSOUND** in respect of **Policy SCLP12.35**