

Dr. T. Coffey MP,
House of Commons,
London,
SW1A 0AA

Kirton & Falkenham Parish Council,
17 Grays Orchard,
Kirton,
IP10 0RE

Dear Dr. Coffey,

I am writing on behalf of Kirton & Falkenham Parish Council, in my position as Clerk to the Council. The Parish Council was heartened by your letter of 13th September to Suffolk Coastal District Council (SCDC) regarding its First Draft Local Plan (FDLP) and the associated video clip posted on your Facebook page.

I am writing with regard to Innocence Farm, adjacent to our village, being a preferred site in the FDLP. The Parish Council (PC) believes that the SCDC process of drafting and reviewing the Local Plan is flawed and is likely to lead to an ineffective final draft being submitted to the Ministry of Housing, Communities and Local Government / Planning Inspectorate. In addition to this, there are significant problems with the content of the Local Plan.

The PC believes that it is necessary to meet with Mr. Rishi Sunak MP, Minister for Local Government within the MHCLG, to raise our concerns about both the process adopted by SCDC and the content of the Local Plan and ask him to consider early intervention. Preferably this would be prior to the December recess. We are writing to ask for your assistance in arranging this meeting. We would appreciate the opportunity to discuss with you the best method of arranging this.

Below are listed some of our concerns regarding the development of the Local Plan by SCDC. Some of these have already been raised with SCDC prior to their publication of the FDLP and have been ignored. Others demonstrate a failure of objective evaluation of site selection by SCDC.

- There has been a wholesale disregard of evidence based planning concerns, including data from authoritative sources, such as DEFRA, raised by the PC in response to SCDC 'Issues & Options 2017' consultation processes, prior to the drafting of the FDLP.
- There has been a disregard of key information within its own evidence base in reaching its preferred site selection.
- The marking of site availability appears to have been entirely inaccurate. One entirely realistic alternative site was marked to indicate the landowner was not willing to develop the land for this purpose when he was and when he had informed the Council he was. It appears as if marking was influenced by whether the landowner had been contacted by SCDC, rather than what information SCDC had been given.
- The use of extremely out of date base data for economic and housing growth. This risks repeating the situation when SCDC disregarded commitments to the Planning Inspectorate made by SCDC during, and following, their 2013 Local Plan.

We have attached an outline of our concerns with the content of the First Draft Local Plan at Annex A. As outlined above, there are issues with both the development, and content, of the Local Plan. We have attempted to address these in dialogue with SCDC, this has failed to date and as such we feel it necessary to raise this with the relevant Minister.

Yours sincerely,

Colin Shaw,
Clerk to Kirton & Falkenham Parish Council

Copied to:

Mr. Stephen Baker, Chief Executive of Suffolk Coastal District Council
Councillor Ray Herring, Leader of Suffolk Coastal District Council

Annex A: Kirton & Falkenham Parish Council concerns with the development and content of the Suffolk Coastal District Council Local Plan.

Our concerns regarding the SCDC process in drafting the Local Plan include:

1. Pollution not addressed in site selection analysis, despite this deficiency being highlighted in responses to the previous consultation.

- a. The First Draft Local Plan (FDLP) makes multiple references to the need to take into account pollution impacts of development on the neighbourhood. However the analysis of sites by SCDC and its consultants almost completely disregards the pollution impact on the neighbourhood, including dwellings and a primary school adjacent to the site. Regarding the conversion of 113 Ha of agricultural land to industrial use, including 3,200 HGV movements per day (figure from landowner’s proposal for the site), SCDC’s assessment is that there are ‘*no issues identified*’ for ‘*compatibility with neighbouring uses*’ and gives a ‘*green*’ assessment.
- b. Whilst SCDC’s “Interim Sustainability Appraisal, July 2018’ documentation, includes the following assessment of air quality issues for Innocence Farm, this information is not carried through or even referred to in the FDLP in its selection of Innocence Farm as preferred site.

7. To maintain and where possible improve air quality	--	Medium term	Permanent	Development likely to result in an increase in emissions through increases in associated traffic movements
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- c. In the same Sustainability Analysis, SCDC claims that the conversion of agricultural land to HGV/port use will have a “*positive/green*” effect to “*To improve the health of the population overall and reduce health inequalities*”.

2. Pollution Concerns

- a. Noise and light pollution. The Parish Council has repeatedly indicated to Bidwells and Trinity College that a great concern is not only visual impact, but also noise and light pollution. Both are very insidious and extremely difficult to mitigate. It is very disappointing that these have not been addressed in any way.
- b. The impact of diesel fumes and NOx has received a great deal of attention recently. What is becoming crystal clear is that living in areas affected by diesel pollution will have a major impact on human health, particularly in the case of children and the elderly. Five studies are listed below by way of example. The PC would suggest that the consultation must address each of the issues raised in these studies.
 - i. **Cancer risk.** Cancer UK has estimated that pollution accounts for 3,500 cases of lung cancer each year (The Times, 12 August 2017).
 - ii. **Heart disease.** A study by Queen Mary University of London and Oxford University has shown that particles emitted by diesel engines have been linked with unusual cardiac growth (The Times, 27 April 2017 and 29 May 2017).
 - iii. **Dementia Risk.** “The evidence from experimental work suggests that ultra-fine particles from engines do get taken up through the lungs, circulate in the body

and produce inflammation,” “That has been implicated in a variety of diseases and it now appears we have evidence that would suggest a similar link for dementia.” (The Times, “Busy roads put millions at higher risk of dementia”, 5 January 2017 citing Calderón-Garcidueñas, Lilian et al., “Living close to heavy traffic roads, air pollution, and dementia”, The Lancet, January 2017).

- iv. **Coughing and wheezing.** Diesel fumes contain chemicals that directly stimulate the nerves responsible for the coughing and wheezing reflex according to a study by Imperial College, London (The Times, 1 May 2017).
- v. **Sleep.** High levels of air pollution significantly affect the ability to sleep (The Times, 22 May 2017)
- c. The proposed logistics facility is adjacent to Trimley St. Martin primary school and residences, and is extremely close to the centre of Kirton village. The enormous quantity of traffic, in particular of slow moving vehicles within the facility, would emit considerable quantities of carbon monoxide, nitrogen dioxide, PM10 and other pollutants into the ambient air of the school and nearby. SCDC and SCC’s responsibilities are recognised in the website, but their responsibilities for pollution go far beyond what is stated.
- d. The DEFRA report (“Draft plans to improve air quality in the UK, tackling nitrogen dioxide in our towns and cities, UK overview document”, DEFRA, September 2015) addressing EC Directive 2008/50/EC and the 2010 Air Quality Standard Regulations (2010/1001) require the drawing up of plans which limit the levels of such pollutants. A new plan was published by DEFRA in July 2017 which emphasised the responsibilities of local authorities in reducing exposure to pollutants.
- e. To permit development which led to an increase in pollutant levels in close proximity to rural villages and a primary school would be both irresponsible and contrary to central government policy. It might also invite legal challenge, directed against both central and local government, from those concerned with limiting vehicle exhaust emissions and potentially expose the District and County Councils to actions for damages by those whose health is adversely affected by the development.

3. Excessive Land Allocation

- a. The evidence base of the FDLP gives a forecast of extra employment for Transport and Logistics of 440 jobs and for Wholesale and Distribution of 180 jobs, with the land required to support this is 14Ha. The FDLP rounds down this requirement for new industrial land to 13Ha in its introductory chapters. The FDLP then ignores its own figure and the FDLP subsequently adopts a figure of a further 26 to 113 Ha of land requirement emanating from discussions with stakeholders in the *Port of Felixstowe Growth and Development Needs Study*. The latter documents states that ‘... *this results in a range of between 26.3 ha (under the Low case) and 103.8 ha (under the High case), with the Central case falling broadly in between and suggesting 66.9 ha*’.
- b. This document states that ‘*Based on latest Council monitoring data, the existing pipeline supply of employment land that is in close proximity to the Port of Felixstowe and considered suitable for port-related activities totals just over 67 ha. This quantum would be sufficient – in quantitative terms – to accommodate the low and central case growth scenarios, while additional land would be*

required to meet the high growth case in full. SCDC is aware, from studies it has commissioned in its own evidence base, that no extra land is required to be allocated to meet the low and medium case within its own District.

- c. SCDC has failed in its duty to cooperate with neighbouring District Councils to achieve efficient use of land. The following table includes the sites that we are aware where planning permission has already been granted for port related, warehousing or container use. Note that within the evidence base, SCDC's own consultants, following discussion with the port of Felixstowe, identified that a 'port-centric' model requires land within 30 miles of Felixstowe. The table above shows that 145Ha is available within this port centric criteria, without any need for Innocence Farm, or any other land, being allocated.

Site	Size (Ha)	Road miles from port	District Council
Existing approved land supply identified by SCDC for B8 use within A14 corridor Including: Felixstowe Logistics Park Clickett's Hill Orwell Crossing	67 Ha (13 Ha) (10 Ha) (26 Ha)	 0 2 11	Suffolk Coastal
Total of 49 Ha East of Orwell Bridge Total of 67 Ha within Suffolk Coastal			
Sproughton Enterprise Park	35	17	Babergh
Great Blakenham Logistics Park	16	20	Mid Suffolk
Gateway 14 (adjacent to Stowmarket East)	30	26	Mid Suffolk
Stowmarket East	13	26	Mid Suffolk
Suffolk Business Park	23	39	West Suffolk
Total of 184 Ha already allocated and with planning permissions.			

4. Land Banking

- a. In this context, Land Banking appears to be the appropriate description for excessive planning permission and employment land allocation by SCDC
- b. As seen above, there is already more than enough land with planning permission.
- c. The Port of Felixstowe and Trinity College have had planning permission since 2014 for the Port of Felixstowe Logistics Park (13 Ha), which is within the port perimeter, and Clicketts Hill (10 Ha) which is within 2 miles of the port. Neither of these have commenced construction due, it is understood, to investment not being available. This does not appear to have been addressed by SCDC.
- d. The Port of Felixstowe Logistics Park, Anzani House and Routemaster Hotel site (the latter two derelict for many years) all owned by Trinity College are brownfield sites which have not been brought into use.

- e. The Orwell Crossing site is an example of land also with planning permission for relevant logistics use, within 11 miles, the same distance by road from the Port to Innocence Farm, which also has not yet been brought into use.

5. Practical Unsuitability of Innocence Farm

- a. There is no assessment of the cost or timescale to enable access to the A14.
- b. The assessment makes the astonishing claim that it is well connected to the rail network. It is clear that the only suitable rail terminal is within the Port itself, requiring goods to be transported back to the origin. The site is separated from the rail network by the A14. Further, alternative sites which are closer to the current railway route, are not claimed by SCDC to be well connected by rail, again demonstrating inconsistency in the assessment of sites.
- c. The Transport Model assessment in the evidence only addressed the cars that would be used by employees to access the site. It omits to model the HGV traffic which is the whole purpose of the proposal. Trinity College themselves estimate 3,200 HGV movements to/from the site per day, which is ignored by the modelling.
- d. Sites which are much better connected to the A14 (i.e. closer and/or with the ability to access both carriageways) are given no higher marks than Innocence Farm.

The Draft Local Plan and its evidence base is many thousands of pages long. Much of it appears to have been produced in a hurry, with huge gaps, inconsistencies and perverse errors within its own content. It was presented to the SCDC Cabinet for approval for public consultation by its officials, stating that it is 'supported by a robust and credible evidence base' which it is clearly not. Whilst the Draft Local Plan refers to its obligation under the devolved powers of the Localism Act (2011) to cooperate with neighbouring districts for land supply, in the case of employment land it clearly does not.

The PC views it inevitable that SCDC will be reluctant to address these deficiencies, given the lack of response to comments raised from the Issues and Options consultation. We fear that, unless this is addressed in the next draft of the Local Plan, then they will continue these deficiencies through to the final draft to be presented to the Inspectorate in 2019. By this time it will be too late to undertake the analysis to achieve the major modifications required, whilst maintain the plan to achieve Local Plan approval in 2019. We are therefore looking for the MHCLG/Planning Inspectorate to intervene early and provide SCDC with corrective guidance.

As a further note, given your interest in housing allocations in your letter to SCDC, the following may be of interest. In its 2017 response to the Issues and Options document, the PC highlighted to SCDC that the figures which it used as base data for economic and housing growth from the Office for National Statistics (ONS) and the Organisation for Economic Co-operation and Development (OECD) were obsolete, dating from 2015 and 2014 respectively. Subsequently the ONS and OECD published in 2016 and 2017 much lower growth figures, yet SCDC appear to have ignored this and continued to use the obsolete higher figures for growth in this Draft Local Plan. Unless SCDC corrects this, its economic & housing allocations will be based upon figures which are 4 years obsolete (ONS) and 5 years obsolete (OECD).