

Shotley Parish Council - Letter to 'Go East'

Dear Ms Caudrey

Following the decision on 8 June 2005 of the Development Committee of Babergh District Council (BDC) to resolve to approve the above application I am writing on behalf of Shotley Parish Council to request that the First Secretary of State directs the Local Planning Authority (LPA) to refer this application to him for a decision and that he takes that decision following a Public Inquiry.

Shotley Parish Council makes this request, but not to the exclusion of other objections, on the following grounds:

1 It is a development that conflicts with national planning policy, specifically:

1a The Environmental Impact Assessment (EIA) submitted by the applicant and the assessment of the same by Officers of BDC fails to meet the requirements of EIA Regulations. The EIA did not identify the full impact that the development will have on the locality. For example the effect on road and pedestrian safety in the village of Shotley was not fully investigated as required in the scoping document the applicant had agreed with the Highways Authority. The Highways Authority and an independent consultant concluded that the B1456 would see an increase in traffic flows that would in places bring the road up to its theoretical capacity. The applicant has not demonstrated how these effects will be sufficiently minimised or ameliorated as required by PPG13.

1b The mitigation measures proposed in the EIA are so vague that it is impossible to determine what effect they will have. The Travel Plan is in effect to be decided at some later date and seems to be limited only to residents in the proposed development. "A clubhouse to which the community may have access" is proposed but there has been no attempt to detail what is meant by this. The parish Council contends that this and many other examples are so inadequately developed as to be open to a myriad of interpretations.

1c The assessment of the EIA by BDC was inadequate in the light of the omissions and lack of clarity, and in consequence falls short of the requirements of the regulations. The LPA should have required the applicant to submit further information or advised the Development Committee that the "precautionary principle" should be applied and the application rejected. Circular 11/95 The Use of Conditions in Planning Permission para. 30 directs that "The framing of conditions requires care, not least to ensure that a condition is enforceable".

1d The application is contrary to the guidance in PPS1 particularly paragraph 5. The location may have been previously developed; however the community it previously supported was self-sustaining and enclosed. All support services including transport were provided by the Royal Navy.

1e The proposal does not contribute to sustainable economic development as required by PPS1; employment opportunities are a very small part of the application and are limited to low wage, part time opportunities which in the case of retail jobs are likely to displace existing village employment.

1f It does not support the existing community or contribute to the creation of safe, sustainable, liveable and mixed communities with good access to jobs as required by PPS1 and PPG3. The proposals will place additional burdens on the existing infrastructure and the mitigation measures are below the absolute minimum one would expect in a development of this size. In some cases they do not even meet the conclusions of the applicant's own assessment in regard to health and social care provision.

1g The loss of the playing field without compensatory measures is contrary to The Town and Country Planning (Playing Fields) (England) Direction 1998.

1h Suffolk County Council concluded that the proposal was contrary to Suffolk County Council structure plan (CS3) and policy (T14), and that it "would be considered an unsustainable site for development on this scale" (SCC E05/34). The Development Committee minutes give no reasoned argument as to why they ignored this policy and advice.

1j The former HMS Ganges site is not identified in Babergh Local Plan Alteration 2, 2nd deposit draft (2003) as the site is in a location defined as an "unsustainable" village in the Draft Local Plan.

1k Furthermore, it is inconsistent with the Draft Local Plan, which states at Para. 3.2 b "The District Council will expect developers proposing housing sites over 15 dwellings, which are not allocated in the plan, to demonstrate need and timing with reference to the Council's monitoring results." The developer has provided no such evidence. In addition Shotley is one of a group of villages, "in which a group of dwellings will not be permitted abutting the built-up area," that is, the development will be kept within the village envelope in order to protect the visual amenity of the AONB and the sensitivity of the SPA.

2 The granting of permission will give rise to regional and national controversy

2a The assessment of previously developed sites in rural locations is a matter of regional and national importance. If we compare the provision of community facilities, transport, employment and infrastructure in this development to that provided at Rendlesham (another former Ministry of Defence (MoD) site in Suffolk) this application is seriously lacking. The consistent application of policy guidance is important and the guidance has in this case not been consistently applied.

2b No statutory consultee felt able to give this application its support. It did not receive the support of any of the non-statutory consultees including an alliance of all Parishes in the area. The decision was taken against officers' recommendations but the official minute of the meeting does not adequately explain the reasons why this advice was ignored. The decision to grant permission against the breadth, depth and extent of the reasoned opposition undermines the consultation process as expressed in policy terms in PPS12.

3 The granting of permission could have a significant effect beyond the immediate area.

3a We are aware that you will be receiving representations detailing the effect on the conservation areas of Chelmondiston and Woolverstone. Our comments relate to the Parish of Shotley. The HMS Ganges site is bounded by Sites of Special Scientific Interest, Special Protection Areas and a Ramsar site. The EIA made only cursory reference to the impact the development will have on these protected areas and consequently no measures are proposed to limit the impact or to provide amelioration or compensation.

As noted above these reasons supporting the case for "call in" are not to the exclusion of others we may wish to submit should this matter come to a Public Enquiry. Shotley Parish Council would wish to address the enquiry should one be held and to that end I should be grateful if you would keep this Council advised of your deliberations.

Yours sincerely

John Mullan
Chair - Shotley Parish Council