

# SHOTLEY PARISH COUNCIL

Chair: M Matthews, 53 Great Harlings, Shotley Gate, Ipswich IP9 1NZ

*Please address all correspondence to the clerk:*

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Gareth Durrant  
Planning Department  
Babergh District Council  
Corks Lane  
Hadleigh  
IP7 6SJ

31 May 2007

Your ref:

Our Ref:

Dear Gareth

**Former HMS Ganges Site and Shotley Marina, Shotley Gate,  
Ipswich IP9 1QJ  
Application B/07/00597**

Shotley Parish Council urges Babergh District Council to refuse the application as the applicant has failed to demonstrate beyond reasonable doubt that the former HMS Ganges site has in fact and degree been used as a residential educational establishment since it was purchased by them some ten years ago. In respect of the period since the departure of the Navy up until 2001 the fact that the site was used for C2 purposes is not disputed, however, that use was limited to the period of occupation by the police, did not extend across the whole site and was a much less intensive use than previously. The application is also imprecise contrary to Annex 8 Para 8.11 of the Regulations. Further the statutory declarations appear to have not been witnessed.

1 The site by any objective assessment is currently derelict and has been for a considerable period of time, a fact pushed strongly by the applicants in their previous application and through their witnesses at the Inquiry. "It is now redundant from its original use, and intervening uses since 1976 have not survived," (Babergh District Council Rule 6 Statement to the Planning Inquiry).

Currently, only one small part of Nelson Hall is occupied by a caretaker. It is believed that electricity and water services to the other buildings have been discontinued. Figure 2 of the Environmental Statement provided by the applicant with the most recent planning application showed by their own assessment that one hectare of the site was covered in buildings in 2004 compared to 3 in the 1980s and that 7 hectares of the site had been cleared; by their own admission 10 of the 24 hectares had been taken out of use.

2 The contention by the applicant in their supporting evidence that since the departure of the Navy "There was never any intention for the site not to be used as a secure training centre" can be disproved by reference to the planning history of the site. At various times in the last thirty years the site has been used or proposed to be used for various uses as diverse as pet food packing, a retirement community, a motor

transport museum, caravan rallies, a scout jamboree and a holiday development. The application by Pottons in September 1989 regarding the new accommodation block never came to fruition. We are not aware of any interest being expressed by an education or training provider to occupy the premises in recent times. We are not aware of and the applicant has not provided any evidence that they have marketed the premises for educational use. Indeed the only marketing of the site has been for speculative residential development.

3 Mr Hollis's Statutory Declaration gives the impression that the Police training facility was in existence for the duration of his management of the site. The term of the lease may have run to October 2001, however, the Home Office vacated the premises at least 2 years before the end of the lease. The fact that the police used the site for residential training is not in dispute. However, this application also has to be judged in "degree." It does not follow that because the lease was for "24 hours a day 365 days a year" that training and education was continuous. In fact courses could last anything from a day to a month and weekend occupation was rare. The numbers on the site at this time never came close to the many hundreds of trainees during the Navy's tenure.

4 The statement of Mr Alder Barber, which has not been witnessed, shows that in the period covered by his evidence the site was occupied on 71 occasions in a period on 475 days, i.e. for less than 15% of the available time. Figures for no other period are presented no doubt because they would concur with local knowledge that the site is rarely used at present. We would also argue that it does not follow that because a training event takes place at a particular location it follows that that location becomes a "training establishment" in any meaningful interpretation of the Class Use Order. Jimmy's Farm now has a classroom but that does not make it a school. Nor does the military conducting an overnight exercise confer "residential" status. The site is used because it is derelict, remote, unpopulated, provides a variety of spaces and a sufficiency of space, can be made secure from access by the general public and the owners are not that bothered by the damage caused. The same way that parts of Bentwaters is used for heavy vehicle training for example.

The contention in paragraph 4 of this statement is again not borne out by local knowledge and would require supporting evidence including of kitchens, dining facilities and so forth being available to acceptable standards, to become credible. Nevertheless an asylum centre is a separate class use to an education establishment.

Local knowledge of the exercise referred to in para 7 supports the statement that there was 300+ people on site for a long weekend and a couple of dozen either side of that preparing and clearing the site.

5 The declaration of Mr Chenery, which has not been witnessed, is also supported by local knowledge albeit with a different emphasis: small parts of the site usually individual buildings or short stretches of road are used occasionally for the purposes described in the statement. Sessions generally last less than a couple of hours and usually involve small groups of 10 or less people. On numerous site visits undertaken by members of this council most recently in February 2006 no building has been observed to be functioning as a "classroom", i.e. with desks, chairs tables,

whiteboards and so forth.

6 The statement of Mr Johnstone can be addressed in a similar vein.

In conclusion we do not believe the applicant has demonstrated neither that the site is currently a residential training establishment nor that it has been so beyond reasonable doubt for substantial periods of time in the past ten years. What evidence that has been offered is not precise and unambiguous and can be contradicted by local knowledge and indeed by the assessment by the LPA of the most recent planning application.

We believe that any return to a residential function would have consequences for local services and infrastructure and that any applicant who wishes to develop a C2 use should do so through the normal planning process.

Should you be minded to grant this application we would urge you to specify in very precise terms the use for the site may. That is it is limited to use by the police and armed forces, including the occasional overnight exercise, on a similar pattern to the past five years. A specific condition excluding the use of the site for Class 2A purposes (Use for a provision of secure residential accommodation, including use as a prison, young offenders institution, detention centre, secure training centre, custody centre, short term holding centre, secure hospital, secure local authority accommodation or use as a military barracks.) should be included and the applicant advised that planning permission would need to be granted for such a use.

Yours sincerely

**Mrs L Rowlands**  
**Parish Clerk**