

Addendum to CD76 PPA: Graham Steel's Paper

1 Consultation

1.1 Para 3.22 The open day was at the request of the HMS Ganges Association who were having their annual re-union locally. "Several local meetings" The developers have attended one public meeting, one Parish Council and one informal meeting with Parish Councillors

1.2 Para 3.23 Haylink's attempt at Community Consultation sought to mislead and lacked any scientific rigour. A glossy 4 page "newsletter" was distributed in the Shotley Gate area and not across the whole area. The intention of this was in my view designed to solicit replies only from those people the developer believed because of their proximity to the site would be predisposed to wanting to see it developed. The newsletter contained inaccurate or misleading information for example by not quantifying thing like job creation or presented as fact matters that could not be so until the determination of the application had run its course:

"This work has been agreed with the Highway Authority"

The newsletter was published 2 months before the HA met to consider the matter.

1.3 The petition was placed at random locations and cannot ensure against double counting. The questionnaire for Shotley Parish Plan was highly controlled. Thirty five per cent of respondents, 413 residents, wish to see no further housing development and the majority of the remainder wished to see only housing to meet local social need. (Para 6.3 Parish Plan)

2 Employment Generation on Site

2.1 The estimate for the potential number of jobs that may be created varies from 13 to 33. This is a maximum of 4% of the number of economically active people that the development will bring, not 10% as was stated on the first day of the inquiry. However, the effect may in fact be jobs neutral in that businesses may relocate from elsewhere or even jobs negative as local shops may not be able to compete with the proposed mini market.

2.2 The process by which the square metres of space was found to be satisfactory can be found at para 5.5.8 of the Chesterton Report (CD2). It arrives at a view having taken statistics from three separate sources compiled at three different times and by three separate methodologies over a period of ten years. I am not a statistician although I did work for National Statistics for a while and this does not seem to me to be best practice.

2.3 At 6.98 the developer states that the floorspace is to cater for the number of jobs likely to be created by the new developments. At 6.96 we can see that it is also flexible accommodation for existing and new business. If the space is to be marketed and taken in this way then there needs to be more than Haylink are proposing in order to absorb the increase caused by the new development.

2.4 Paras 6.5.3 and 6.5.4 recommend additional retail space for hairdressing and takeways and also a pub and a gym. This is reiterated at 7.7.2 where the recommendation seems to be for 557m² in total. I am not arguing for a pub here as I would never get served in Shotley again but clearly the consultant envisaged more than is being provided in the Masterplan. The Holbrook Co-op is 482m² that is more than the 471m² provided for in the Masterplan.

2.5 Whilst it is true that if you bring in extra numbers you are going to expand or create markets for goods and services. But again this does not automatically make the development sustainable. Creating demand and then trying to meet it does not seem a sustainable way of doing things. A sustainable development would start by addressing the issue of meeting the needs of existing residents first, for example the presence on the peninsula of a large number of self employed builders and such suggests that building supplies wholesaler would be useful.

3 Employment Away from the Immediate Shotley Area

3.1 The developers believe that future employment demand at Bathside Bay, Felixstowe South and Brantham can be met by increasing the supply of labour at Shotley. I believe that people generally find a job first and then look for accommodation.

3.2 The belief that people from this new housing estate will find working at Brantham appealing is in my view delusional. The developer contends that Brantham is 17km from the site – as the crow flies it may well be, however, by the most direct route using the B1456 and the A137 it is some 27km distant. There is no direct public transport between Shotley and Brantham. People who are using this as a commuter route into London are going to extremely high net worth jobs in the capital. The site is also in a rural location and has little in the way of supporting infrastructure such as a supermarket. In any event the site requires extensive decontamination and remediation including the surrender of two waste management licences and the removal of 200 years of industrial buildings and equipment. Planning as to its future use is at a very early stage and therefore no information as to the size and composition of the workforce exists.

3.3 In any event housing would need to be provided on part of the site in order to fund part of the development and those residents are more likely to provide a local workforce. Manningtree and Lawford are both considerably closer to Brantham and have a higher unemployment rate than Berners ward as does Brantham itself.

3.4 Comments on the potential for employment at Bathside Bay and Felixstowe South need to refer to the comments on the foot ferry below.

3.5 Whilst permission for Bathside Bay has been granted whether the development will go ahead is still a matter of conjecture. One other site in Southampton Water has been granted permission for a deep water container terminal and a decision on another at Thames Gateway is imminent. It has been argued that there is not the capital capacity within the industry for all three to actually be built.

3.6 The Tendring District Council Local Plan states at Policy H1 Housing Provision "Provision is made for a net dwelling stock increase of 6,250 dwellings in Tendring District in the period to 31 March 2011." 1429 Units would be at Harwich. There would be no need at all for potential employees of Bathside Bay to live on this side of the Stour.

3.7 Additionally, account needs to be taken of the fact that both Felixstowe and Harwich have substantially higher unemployment than Shotley and that the local workforce are more likely to possess the skills required by a container port. DTZ found (4.08) that on the Peninsula half of businesses suffer from hard to fill vacancies and that engineering and marine skills have been identified in particular.

3.8 The situation with regard to Felixstowe and Harwich depends very heavily on the future for the foot ferry. The foot ferry has already had substantial sums of money invested by the public purse:

Approximately £60 000 in consultancy fees (Babtie 1997, Shelley 2003 and DTZ 2005)

£150 000 for a new landing pontoon at Shotley Marina

An annual subsidy of £15 000 since 2000

3.9 The DTZ report estimates that a capital investment of between £1.64m and £1.84m plus dredging costs, bus shelters, the costs of bus transport to town centres, employment places and transport hubs.

3.10 No service in the country of this nature exists without substantial public revenue subsidy. Annual running costs are estimated at £219 000. Shelley estimated that passenger trip numbers could reach 101 800 of which 21 600 would be commuter journeys. This equates to approximately 500 commuter trip numbers every week from Shotley to Harwich and Felixstowe.

3.11 In the real world only those in very close proximity to the ferry are going to use it. Let us say I wished to use it, I live about 3km from the ferry.

Wait for bus 5mins

Bus journey 10mins

Wait for ferry up to 20mins

Ferry journey 20mins

Wait for bus say 5mins

Bus journey Harwich to place of work 10mins

Total journey time 1 hour 10mins at a cost on current prices of £10 return fare compared to 45mins or so in the car, this may be a worst case scenario but transport choices are made on worst not best case. People also use their cars as it gives them options at lunchtimes and after work which fixed modes do not.

3.12 The conclusion of the DTZ report was that the next 18 months will be used to establish **if** a rigorous case and business plan can be made for the investment the service will need.

3.13 On the employment front there is only one way to make the site sustainable and that is through a development that maximises the potential of the site for a true mix of uses and by investment in the local economy.

4 The 404 retirement Homes

4.1 It has been intimated that the Parish Council are being duplicitous in supporting the 404 albeit with reservations. The response of the Parish Council was an evaluation made 22 years ago and I guess everyone now has a greater understanding of sustainability, Babergh would probably come to a different conclusion today as well.

4.2 This was a proposal closer in form to the original use of the site and would have been a substantial job creator. It was also prior to the building of the housing development to the west and south of the B1456 that almost doubled the population of the village by 1988. Most importantly in the eyes of the community it would have left the sports and recreation facilities intact including the gym, swimming pool and sports field and these were in much better condition than they are today and importantly they were in use and there was community access.

4.4 It has also to be noted that RAF families were at that time occupying about 200 homes away from the site and they had their own infrastructure: a NAAFI, a nursery, medical facilities, playground and subsidised transport. These homes were emptied in about 1999 and sold to private tenants some 6 years later. When the RAF left so did these resources.

4.5 Since that time we have had the marina development with the attendant pressure on the roads, the marina housing development permission, permission for 12 houses at the Shotley Boatyard and some 20 homes on infill sites or farm building conversions.

4.6 The announcement by Haylink that should permission not be granted for the 325 that they will go ahead with the retirement community is in my view an empty threat. If there had been a market for this proposal producing a decent return for the developers it would have been implemented years ago. It is fraught with complications – the lack of an EIA, what to do with the scheduled buildings and so on. It would also leave them with about half of the site, derelict buildings and the playing field and I guess there would be no chance of getting permission for further housing development.

If this has been their intention all along why has it not been raised in the 4 years that this consultation has been on going and a proper comparison of the 2 schemes could have been made?

5 Community Access to the Playing Fields and other Facilities

5.1 A portfolio of evidence is attached as Appendix One and witnesses tomorrow will attest to the community access and use.

5.2 6.112 is contradicted by 6.150. Babergh have allocated the land as visual and recreational amenity in the Local Plan. They did not seek to change this in the Local Plan revision process, nor did Haylink put in an objection to this allocation.

5.3 Mr Derbyshire refers to the provision of a cricket pitch. This offer, on which we were not consulted, was part of the 500 application it is not part of the current application.

6 Contamination

6.1 At 6.44 Mr Derbyshire contends that there are no contamination issues to be resolved. The Environment Agency and the Committee report refer to contamination issues as being outstanding. Chapter 3 Appendix E of the Technical Appendices details the results of a partial visual inspection of the site which found significant amounts of asbestos and recommended further investigation and the preparation of risk assessments. I am not aware that either has been done.

6.2 There has been fly tipping at various places on the site and recently evidence of intravenous drug users has been found.

7 Education

7.1 There is no reference to the impact on pre school education or after school facilities. Shotley has a thriving facility providing both, highly recommended by OFSTED that is full with a waiting list. There is a single private nursery on the Peninsula at Woolverstone.

8 Health

8.1 The proposed mitigation does not meet the recommendations of the the health impact assessment. The HIA's best solution was for an additional GP and a practice nurse and further discussions with social Services on social care issues.

9 Affordable Housing

9.1 We have noted that the Haylink offer for on and off site is a total of 67 units which is slightly ahead of Babergh's requirement for 20% of the total to be committed to affordable housing. We have provided evidence in our Parish Plan showing that housing need locally exceeded the estimate in the Babergh Housing Needs Survey. For this reason and because the development should be contributing towards meeting housing need in the whole district (the same argument Haylink have used to justify the totality of the development and I believe it also was what the councilors voted for) we consider that the 35% affordability policy should be pursued.

We have had no response to the points we have made regarding provision of sheltered housing and a foyer type project on the site. We would also wish to see a small number of one bed roomed accommodation. We believe that it is fundamental to the sustainability of the site and the area, that vulnerable elderly people remain close to their family and social support networks and that young people are able to make real choices about education, training and the transition to adulthood.

Graham Steel
20 February 2006