

CLOSING SUBMISSIONS
SUFFOLK COUNTY COUNCIL

Thank you Sir for the opportunity to come along and make my closing submissions on behalf of Suffolk County Council. The purpose of these closing submissions is not to repeat the County Council's case in detail but to concentrate on those principal matters that fall within the remit of the Strategic Planning Authority. Just to reiterate, Suffolk County Council participated in this Inquiry as the Strategic Planning Authority and did not make any submissions as the Local Highway Authority.

As the Strategic Planning Authority the County Council's evidence concentrated on the first three of the main considerations listed by you Sir in the notes of the pre-inquiry meeting and also in the Secretary of State's letter dated 17 August 2005.

If I may turn to the first heading. It is "whether there is a need for the proposals to meet identified housing need". It is not disputed that the structure plan requirement for Babergh District for the period between 1996 – 2016 is 6900 dwellings. The Housing Topic Paper (CD28) makes it clear that the District's total housing provision equates to 7001 dwellings over the same period resulting in a surplus of 101 dwellings above the Structure Plan requirement.

The current proposal was included in the housing figures as a "deemed commitment". A 10% discount has been applied to it and so the proposal in housing supply terms was taken into account as 293 dwellings. If permission is refused for this scheme the District's housing supply would reduce from 7001 to 6708, some 192 dwellings below the Structure Plan requirement for the plan period. This is not significant in planning terms. Further, if an alternative scheme with a housing element of up to 200 dwellings came forward the surplus would be reinstated.

The Applicant's representative repeatedly confirmed that if the current scheme is refused, (as we were told on 15 February 2005), Haylink would consider implementing the permission for 404 retirement units. Mr Cooper was clear that in fact this fallback would have the advantage of "removing the s106 package" and also "it only uses part of the site" leaving the rest of the site available for further development. In CD105 "Haylink Ltd's Position Statement" it is said that "it represents a viable form of development which will be pursued

along with the re-use and/or redevelopment of the existing institutional buildings on the HMS Ganges site”.

If the current scheme for 325 dwellings is refused the 404 retirement homes will come forward. Following any refusal of the current application the 293 dwelling “deemed commitment” would immediately be replaced by the 363 dwelling commitment associated with the retirement scheme ($404 \times 90\% = 363$) increasing the District’s housing surplus by 70 to 171 dwellings. In simple terms there is no identified housing need which the proposals are required to meet.

It was also suggested by the Applicant that if permission is refused for the HMS Ganges site it would not be possible to implement the adjoining development at the Shotley Marina for 150 units, as access to this site, we were told, is reliant on grant of permission for the former HMS Ganges. I hope Sir that you appreciated from your unaccompanied site visit that there is in fact an alternative access to Shotley Marina which would enable at least part of that development to go ahead. Indeed, the work on the first phase of this alternative access to the Shotley Marina site has already started on Queen Victoria Drive and King Edward VII Drive.

As there is no identified housing need for the proposals, the Applicant advanced a further argument to justify the scheme. Mr Derbyshire said in para 6.62 of his proof that “Babergh will struggle to meet both the RPG and PPG3 targets for building on previously developed land” and the local Planning Authority’s witness Mr Lander also placed great emphasis on the brownfield status of this site. He said in para 4.36 of his proof that “if this was a greenfield housing proposal on a site without an established history of intensive built development and human activity, this disadvantage (poor accessibility) would be likely to count conclusively against the grant of permission”.

In cross examination it was established that previously developed land targets are national and regional targets and that the East of England has achieved the national target of 60% in recent years. Further if we look at Haven Gateway Sub-Region, within which approximately half of Babergh District lies, it shows a healthy 67% of dwelling completions on previously developed land over the period 2001/2-2003/4. Commitments on previously developed land indicate an even higher percentage of 71% in the Sub-Region at March 2004, or 17,036 dwellings amounting around 7 years supply of brownfield land. This is set out in the 2004 East of England Monitoring Report at CD99. This clearly demonstrates that there is no

need to develop the HMS Ganges site for 325 dwellings simply because part of it consists of previously developed land.

Turning now to the second main consideration “whether a sequential approach to site selection has been followed”. It has clearly not been followed. In cross-examination when taken through Policy 4 of RPG6 it was admitted that HMS Ganges did not follow the order of preference set out in that policy. It is not in the cities and larger towns, nor it is in other towns where development would contribute to greater self-containment in demand for travel, nor in towns with good public transport accessibility, provided that growth in car commuting can be minimised. As 325 units is not a small scale of development the exception in the last paragraph of the policy doesn’t apply.

When taken through policy CS3 of the Suffolk Structure Plan 2001 it was again admitted that the HMS Ganges site is not located in or adjoining a town. Although it is a major housing development it is not in the Ipswich Policy Area nor at Bury St Edmunds (CS3 para b). It is not at Lowestoft, Stowmarket, Sudbury or Haverhill, locations identified in para c for significant housing development. It is not in other towns or villages with potential for housing development primarily meeting the needs of their surrounding area, as identified in a local plan (CS3 para e). And finally it is not in accordance with paragraph f, which only envisages small scale infilling within the built up area of villages not identified under paragraph e. The proposal does not comply with the sequential test.

In re-examination there was much emphasis placed on the words in paragraph 5.20 of the supporting text to policy CS3, namely that CS3 paras e and f “should not be applied rigidly or mechanistically” as “characteristics of villages vary considerably across the County and some are unique”. Of course these words cannot be looked at in isolation. Limited flexibility is envisaged to enable local planning authorities to take into account local characteristics and needs when drawing up local plans. There is no local need for a major housing development at the very tip of the Shotley Peninsula. Further, the local characteristics of Shotley Gate were assessed during the local plan process as part of the Council’s Sustainability Appraisal Of Alternative Sites Submitted At The First Deposit Stage (CD98) and all sites considered by the Council within Shotley Gate and Street scored very poorly. Neither Babergh District Council nor the Local Plan Inspector considered Shotley as a sustainable location. Shotley Gate is indeed a unique village, uniquely unsuitable for major housing development of 325 units.

This leads me to the third main consideration identified by you Sir, that is “whether the site is accessible to jobs, shops and other services by modes of transport other than the private car or there is potential to achieve this”.

As said in the County Council’s opening statement and confirmed by Mr Lander in his examination in chief the former HMS Ganges site has similar characteristics to abandoned military airfield sites. The County Council’s position is that even these airfields have a locational advantage over HMS Ganges. They are at least inland and served by a choice of highways. The former HMS Ganges site is on an isolated peninsula with one class B road in and out. The water is a barrier and although the County Council supports the further development of the existing ferry service, the resulting modal shift in favour of ferry travel is unlikely to be substantial.

The same applies for the likely modal shift to the bus services. As set out in evidence, only 7% of the population uses public transport. The Shotley Peninsula Strategy (CD79) indicates that as few as 2.6% of trips to work are undertaken from the peninsula by bus minibus or coach. Most people travel to the closest town, Ipswich, by private car, and most occupants of dwellings on the HMS Ganges site, if development were approved, would be likely to do the same. This would clearly be contrary to national and regional policy and the local development plan.

Both Shotley Gate and Shotley Street have limited facilities and services and little employment provision. It is evident from “travel to work data” extracted from the 2001 census that 63 percent of the existing residents travel in excess of 10km to work. This evidence indicates that Shotley Gate already functions largely as a dormitory settlement with a low level of self containment.

To conclude on this point, the proposal for 325 homes amounts to a very large housing estate in a remote cul-de-sac location for which there is simply no overriding planning justification.

The County Council’s position on the redevelopment of the site is linked to the achievement of a less unsustainable form of redevelopment. The County Council considers that the level of housing should be significantly reduced to a maximum of 200 dwellings, alongside a significant increase in the level of employment generating floorspace to achieve a better balance of uses and greater self containment.

Suffolk County Council's evidence has proven conclusively that there is no need for the scale of development proposed, which would fundamentally conflict with the principal aim of the planning system to achieve sustainable development. As a consequence the proposal is considered to be contrary to national and regional guidance and development policy, with insufficient material considerations to warrant approval of the scheme in its present form.

It is respectfully requested Sir, that for the above reasons, planning permission should be refused by the Secretary of State.