

## **RESPONSE FORM GUIDELINES**

### **For the Babergh Development Framework**

This is intended to help people wishing to make a response to the Proposed Modifications to Babergh District Councils Core Strategy (May 2013). That full document can be obtained from Babergh D.C or from Brantham Parish Councils website

<http://brantham.onesuffolk.net/parish-council/>

Page 1 gives some notes on the form and details of where to send it. To be considered valid, responses must :

- A) Address the Main modifications or the Sustainability Appraisal (This is huge and mostly contains the same stuff but I'll refer back to it later)
- B) Be received either by email or on paper by 4.30pm on Tuesday 9<sup>th</sup> July, 2013.

Page 2: Part 1: Personal Details.

Section A is straightforward. If you are responding on behalf of a group or organization you can enter your title & the group name.

Section B: Agents Details would only apply if an Agent, like a solicitor or other professional expert were responding on your behalf.

Pages 3 & 4: Part 2: Representations. You need to fill out a Part 2 for **each** Modification that you want to address. The Modifications are all numbered .

1. The Page [Numbers](#) & Modification Numbers that directly and indirectly refer to Brantham & our situation are: Pages 2,3,6-9, 22-28 and Maps 4 and F and Modification Nos 4,5,6,7,14,15,25,26,27, & 29.

But the **key modifications** that propose using the Greenfield Land are **25 and 26** (and 26 is the map).

Those are on **Pages 22-25** and the map is **Map F** (at the end of the document).

There are some other modifications that may be worth addressing, but for the moment this will just address Mod. 25.

2. Your choice of which box to tick. Support or Object. The unanimous feeling at the Village Hall meeting was to Object.

3. Space for your Representation. Some potential ideas will follow after this.

4. If your representation is over 100 words, you should put a short summary of it here.

5. This suggests that you may have further changes to improve the strategy. I suspect that only a Planning Lawyer or official would have the background to do this.

6. Do you think the Strategy is legally Compliant? Again I imagine that the planning lawyers have made sure it is. Unless you know better, I'd be inclined to just avoid NO.

Is it SOUND? The meeting didn't think so. So at least a NO and maybe a Yes, with my suggested change.

7. This is to describe why it might Not be Sound.

Positively Prepared? Maybe not. The Greenfield Land would not normally receive any Planning permission as it lies outside what is called the 'Village Envelope'.

Justified? We don't believe so, I think.

Effective? Again maybe not. There simply isn't enough information to tell.

Consistent with National Policy? You would need to know and understand National Policy to be able to tell. In fact that has been changing quite a lot recently, so it probably is consistent (but nobody knows for sure)

8. If you want to speak at any possible Oral Hearing put a cross in the first box, otherwise the second.

9. If you think an Oral Hearing is needed, this is the space to give your reasons for one.

**And then finally, Sign and Date and Send.**

Page 5. Deals with the Sustainability Appraisal I referred to earlier. This is a 65 page document, which contains ALL the Major Modifications PLUS some charts which **Score** various Environmental and Sustainability questions. The Review on Pages 64 & 65 seems to conclude that the site could environmentally support up to 700 houses (That's NOT being suggested by the way). I'm not too sure whether addressing this will help. It gets a bit technical.

OK: That's how the form works! **What to put in a Representation?** It is NOT for me, or anybody else, to put words in your mouth. But here are the **two key changes to the Core Strategy** exactly as they appear in **Modification 25 (pp22-25)**. They both deal with the addition of the Greenfield land within the Development Area. By the way this section deals with **Policy CS6a** Brantham Redevelopment/Regeneration Area only and not .Babergh as a whole.

**From the top of page 23 (bold red indicates major change as published).**

The site is partly crossed and partly abutted by the main London Liverpool Street to Norwich rail route, and has estuarial frontages. The industrial site is separated from the main village by Greenfield land within the same ownership **and the owners have suggested that some or all of this land (see Map F) should be developed for housing and open space,**

**as part of the development package, in order to promote overall regeneration. This is being investigated and the policy allows through Proviso D, for these issues to be resolved.**

(NB: Proviso D refers to the Greenfield land).

### **Also from the bottom of Page 24.**

**(This is the whole of Policy CS6a and it contains a lot of things that you might question. The changes are again in bold red. The highlights are mine. )**

## **Policy CS6a Brantham Regeneration Area Allocation**

Land at Brantham Industrial Area is allocated as a regeneration area and special policy area (as shown on Map F) where the retention of current and future employment uses is to be prioritised and the redevelopment of obsolete buildings and under-used land achieves a balanced form of mixed-use development.

Comprehensive redevelopment proposals for the whole of the allocated site will be informed and guided by feasibility / viability evidence and a masterplan. Together these will ensure the enhancement and balanced regeneration of the site; provide for the maximum possible retention and enhancement of local employment opportunities; deliver an appropriate level of residential development and community facilities; create new areas of public open space and enhancement of pedestrian and cycle links between the site and the village.

A. The land north of the railway line (25 ha.), being the former Wardle Storey and ICI (now ITW) works sites, forms the priority area for redevelopment, where new and retained employment land uses should predominate in principle

B. The land south of the railway line (partly previously developed) (15 ha.) is expected to be subject to minimal or no new development. In this area, the opportunity to provide and enhance natural ecological assets should be prioritized

C. **The scale location and form of residential development should be determined with regard to:**

- **a level that is proportionate in scale to the existing village / parish and capable of satisfactory assimilation;**

- the need to ensure that new residential development is provided in suitable location(s) in relation to flood risk;
- the need to provide a satisfactory relationship with other land uses, including potential 'bad neighbour' activities and processes; and
- where access to ~~local facilities, services and~~ (this bit is being replaced with the red bold text) employment opportunities **and local facilities / services that have capacity to accommodate growth or new facilities / services** are maximised; addressing the meeting of identified housing needs

**D. If viability evidence for a comprehensive and integrated planning solution to the whole site suggests additional residential development on some of the adjacent Greenfield land, between the site and the village (see Map F), this will be considered in relation to the benefits of the overall regeneration package.**

Applications will be assessed with regard to:

- an appraisal of the nature, extent and means of remediation of any land contamination present on the site;
- production of a Flood Risk Assessment; protection of the biodiversity and wider river environment in the locality and any opportunities for enhancement;
- protection of the area's cultural heritage;
- impacts on existing landscaping tracts, together with proposals for mitigation / further landscaping measures;
- landscape impacts on the wider Dedham Vale and Suffolk Coast and Heaths Areas of Outstanding Natural Beauty;
- no material adverse impacts on neighbouring residential amenity;
- satisfactory improvements to and integration with the local road network, including vehicular access to the A137, separation of industrial and residential traffic within the site, the integration of pedestrian and cycle links, the production of a green travel plan, and contribution(s) to provision of local bus services.
- development feasibility / viability evidence

## Implementation and Delivery

The Council is committed to achieving the positive, prompt and beneficial regeneration of this site and will continue to work **constructively and proactively** with landowners / developer(s) and **other interests** (*this includes the village presumably AMc*) towards that end. The Council will also pursue and

support in principle initiative(s) aimed at securing external funding for the successful delivery of this site's regeneration (where justified) or accelerating its timescale if appropriate.

Given the lead time required to resolve complex planning and development issues; ensure a satisfactory form of development; and to see the build out of the regeneration area, **a specific phasing period for this scheme within the Plan period is not considered appropriate.**

Progress will be regularly monitored and the latest position reflected in regular employment land reviews and trajectories. If there is no progress with preliminary work enabling this site to be redeveloped within five years of adoption of this local plan the allocation will be the subject of review (in consultation with neighbouring authorities).

Ok, that's a lot of stuff. The bold red is the key to the Greenfield development. The highlighted sections are those that raise questions.

Is this going to be Proportionate?

Will this leave a satisfactory relationship with other land uses?

How can local facilities be given the capacity to deal with this large an expansion, and more importantly, will they? Development promises seem to be made to be broken

Won't this impact on the landscape?

Can the road network, particularly the A137, handle that much additional traffic even with improvements?

Is this really viable? Will it be sustainable or will we be exchanging one white elephant site (which actually looks better now it's been flattened) for a permanent blight on the village?

Is the aim of this to develop the original factory site at ALL costs? Is Greenfield housing just the easy way out during these difficult times?

We're prepared to accept Brownfield development on the factory site, even though that will be quite a lot of houses, potentially 200-300. That's already on the table.

Our responses/submissions/representations need to point out that the Policy sections Highlighted in yellow do NOT fit in with wider development of up to a total of up to 600 properties and ruining Greenfield Land. The proposed modification is actually contradicting itself! There are other contradictions in the rest of the document.

Because of that and a few other things I'm sure we can all see the Policy and the proposed modification cannot be regarded as sound. We should say so!. The Parish Council will be making its own response taking points made at the meeting into account.

Despite protesting by the owners that they will pull out if they don't get their Greenfield development, there IS money to be made for them on the Brownfield land which includes a 'Greenfield' strip by Temple Pattle which is hardly like the main factory land.

One resident has suggested a hotel complex. There IS a shortage of hotel rooms in this area. Others have suggested Solar Panels on the factory site instead of using fields at Tattlingstone.

I would still recommend that anyone wishing to make a response print off or obtain the relevant Pages of Modifications and consider them carefully. There are probably other points that could be made. I've just concentrated on what I believe to be the most important one.

One final point. I'd avoid making any inflammatory statements in submissions. It's likely to be counter-productive.

I can be contacted as normal, but I'm no kind of expert. I've just read the paperwork.

Alastair McCraw.