

Dear Sir

Brantham Parish Council (BPC) notes that Babergh District Council (BDC) has responded affirmatively to all the procedural questions which you asked them. We would like to refute BDC's confirmation that "the CS is in conformity with the National Planning Policy Framework (NPPF)".

According to NPPF planning should be **"a collective enterprise. Yet, in recent years, it has tended to exclude rather than to include, people and communities."** Plan making paragraph 155 states that "early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged ..." Additionally paragraph 183 states that "neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver sustainable development they need. The only shared vision to date has been that of BDC and St. Francis Group (SFG) . There has been a poor level of engagement and consultation from both BDC and SFG. It has been neither 'constructive' nor 'proactive'. BPC has been kept in the dark for far too long. The lack of communication between BDC, SFG and BPC to date has been deplorable as has the "private discussions" between SFG and BDC. It is only recently, June 2013, that BDC have offered to form a group to discuss possible outcomes.

The NPPF talks of **"the golden thread of sustainable development."** According to the minister this is "change for the better, and not only in our built environment." None of these will happen if Proviso D is included. The quality of life for existing stakeholders i.e. residents will deteriorate due to the ensuing noise and visual pollution, traffic congestion and pressure on already inadequate services – sewage and sanitation, health care, education, transport, etc. The environment will be permanently damaged and lost forever by the loss of agricultural land to urban development. Future generations will not have a high quality of life in a village where the infrastructure cannot cope with the current demands on it, let alone a possible increase of c600 dwellings. According to the Strategic Housing Land Availability Assessment 2011 Update (SHLAA) the 600 homes is BDC's estimated capacity and there could be 680 dwellings if 40 dwellings per hectare were built and a staggering 850 if 50 dwellings per hectare were built. However the SHLAA also mentions a figure in villages of 30 dwellings per hectare which would result in 510 dwellings!! It does also say that development should be "no more than 15% of existing housing stock", which would equate to c150 – ideal for the Brownfield site.

Proviso D proposes to allow residential development on Greenfield land, subject to viability evidence. This land would not normally be considered under the NPPF for such development on its own. It would appear that SFG are using the stick of not developing the Brownfield site to compel BDC to grasp the carrot and to allow building on the Greenfield area. SF purchased this Proviso D land some years ago, separately from the original Factory Site, We believe this was done with this very, undeclared, aim in mind.

Proviso D would also not conform to the “**core planning principles**” and the “**three dimensions of sustainable development, economic, social and environmental**” - para 7 in the NPPF. In the current economic climate what are the prospects of mixed use development? The Brownfield site is a perfect example of the economic role - “**land of the right type being available in the right place and at the right time**” – para 7. Plan making paragraph 157 states that “local Plans should plan positively for the development and infrastructure required in the area to meet the objectives principles and policies of the Framework” and “ be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations. However the development requirements have not been fully identified and recognised especially concerning the infrastructure – water, sewage, sanitation, access, education, health care and general services.

As regards the social role how will c600 dwellings contribute to a strong, vibrant and healthy community? What are the projected provisions for accessible local services that reflect the community’s needs and support its health, social and cultural well-being? There is no disagreement of a need for housing which can easily be accommodated solely on the Brownfield site. Development on the Greenfield land will not achieve the environmental role “**protect and enhance our natural... environment**”.

We would specifically refer you to principles 1, 2, 7, 8, 9 and 11 - para 17 - core planning principles.

Proviso D does **NOT** meet principle 1 - “**empower local people to shape their surroundings**”. To date there has been minimal joint working and co-operation. This has been evident between BDC, SFG and other future partners in the development, not with BPC and residents. Rich Cooke stated at the meeting on Wednesday 19 June that even if proviso D is not included in the CS, SFG could still apply for planning permission and BDC could overrule the CS and grant planning permission!! What does this say about empowering local people to shape their surroundings?

It is difficult to envisage how Proviso D will meet principle 2 “**enhance and improve the places in which people live their lives?**”

Nor does it meet principle 7 – “**contribute to conserve and enhance the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value**” ie develop the Brownfield site, NOT the Greenfield area.

Principle 8 states “**encourage the use of land by reusing land that has been previously developed**” i.e. Brownfield site”.

Principle 9 “**promotes mixed use developments**” i.e. the Brownfield site and not just housing development which SFG wants on the Greenfield area.

Finally principle 11 states that **“patterns of growth should be actively managed to make the fullest possible use of public transport, walking and cycling and focus significant developments in locations which are or can be made sustainable”**.

There is no doubt that this is a significant development, contributing a projected c600 homes out of BDC's requirement of home. However public transport in Brantham is poor – see response to Inspector's questions.

There are other contradictions, as outlined below:

Section 6 paragraph 50 states that local planning authorities should “identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.” C600 homes is does not reflect local demand, but it does meet a huge proportion of the demands made upon BDC by the Government.

Section 6 paragraph 55 states that local planning authorities should “promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.” Without significant infrastructure the reverse will occur.

Section 11 paragraph 109 states that planning system should “contribute to and enhance the natural and local environment

Section 11 paragraph 110 states that “in preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.” i.e. the Brownfield site should be developed first.

Ensuring viability and deliverability - paragraph 173 - states that “pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. BDC has to date refused to share viability details with BDC, despite repeated requests.

Under Implementation and Delivery in the Core Strategy (CS6a) we note that due to ‘lead time issues’ a specific phasing period is not considered necessary. We would like to see some safeguards as in Ensuring viability and deliverability - paragraph 176 – “to make a particular development acceptable, the development should not be approved if the measures required cannot be secured through appropriate conditions or agreements.” If no phasing or safeguards are secured what guarantees will BDC, and we BPC and the stakeholders (residents), have that Brownfield and Greenfield development would take place at the same speed? A result that might see little or no development on the Factory site, but significant Greenfield housing, would surely fail to meet BDC's declared aims. BDC say that they would seek Guarantees in the Planning Process, but surely this should be included in the CS itself. As the 40 hectares of Brownfield land have already been available for sale and always could be, there seems to be a danger of a ‘Trojan Horse’ without some strategy provisions.

In the event of some Proviso D Greenfield development, which we wholeheartedly oppose, phasing **MUST** be included to ensure that the overall planning objective can be met. The Brownfield site must be developed first if any further development is to take place at all.

Housing is needed here as elsewhere, as is employment, but development should be proportionate to the size of a community and to the availability of land i.e. the Brownfield site.