

Additional Evidence by E. L. Toms (Ted Toms)

**Brantham Regeneration Area (Main Modification 25)**

**Matter:** Is the proposed inclusion of additional land for open space and housing ('Proviso D land') between the Regeneration Area and the existing settlement necessary and justified by the evidence base?

**Specific Questions posed by the Inspector:**

**6. Is the loss of open countryside justified by the evidence base, and have all options using brownfield land been thoroughly explored?**

**9. Has sufficient public consultation and engagement been undertaken to consider the inclusion of the Proviso D land at this stage?**

**Responses to the Inspector:**

**6.1 Is the loss of open countryside justified by the evidence base?**



In the summary of my original objection to Main modification 25 of Babergh District Council's Core Strategy - I stated that it would result in the destruction of landscape of the highest international artistic importance.

PRC Architecture and Planning Ltd of Surbiton's - 'Visual Impact & Landscape Character Assessment, Factory Lane Site, Cattawade, Brantham, Suffolk.' the consultants' report that Babergh DC is relying on to support their argument for modification 25 is poorly researched, biased and inaccurate.( N.B. I have expanded on the details of this in the main body of my original objection)

Descriptions of the Proviso D land are factually wrong.

Assessment of impact on the local community is factually wrong.

Visual locators of the site appear to have been researched on Google Streetview and do not take into account a number of spectacular views of the Proviso D landscape, seen from high vantage points on the Essex Way and Stour Valley stretch of the E2 European Long Distance Footpath as it passes through Lawford, Manningtree, Mistley and Bradfield.

The photographic evidence that supports it is of very poor quality.

The map evidence that supports it is wrongly marked and misleading.

On their own admission, all of PRC's evidence gathering was desk based with the exception of **one site visit** as reported:

*A site investigation took place on January 18th 2010 to identify existing conditions in and around the site, establish the zone of visual influence for the site and the relationship between the proposed scheme and its setting. Conditions during the visit began with a slight mist, but cleared throughout the day and did not impede visibility.*

Although this visit occurred in early 2010 and the report is dated as being issued in August 2010 it is not clear when this was available to Babergh District Councillors. It is a clear blueprint for Proviso D, and clearly refers to and identifies the greenfield site in maps and visual locators, in an attempt to justify the loss of this open countryside, on behalf of PRC's clients .

In the appendices of maps and photographs of this report the legend names the commissioning clients as Babergh District Council and Rivercove Ltd and dated 30<sup>th</sup> April 2010. One assumes Rivercove Limited refers to Rivercove Trustee Limited an Isle of Man trust company which was purchased off the shelf for the purpose of the Site purchase and development. Its beneficiary is a trust of the Kelly Family ('the Patrick James Kelly Settlement Trust'). Members of the Kelly family own a number of property companies, including St Francis Group Limited and St Francis Group (Brantham) Ltd. Although all matters relating to this development, refer to St Francis Group, it is not clear which of their companies actually now owns the Brantham site, and in what jurisdiction that company is based.

As Brantham Parish Councillor, Alistair McCraw has already raised the point in detail, the issue of Proviso D ,building on the greenfield site - a major change to the Core Strategy - had not been debated by elected councillors at Babergh District Council, nor minuted in meetings, until March 2013, when St Francis Group raised the viability of developing the brownfield site without building on the greenfield site. As the date of this report demonstrates it was a clear intention to try and build houses on the greenfield site from the outset.

**Conclusion: The evidence from PRC that Babergh District Council is relying on to justify the loss of open countryside is not sound.**



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## 6.2 Have all options using brownfield land been thoroughly explored?

There have been no detailed plans released to the general public on what the developers and Babergh planning department are proposing to build on the brownfield site.

The only indications can be found on page 21 of PRC Architecture and Planning Ltd of Surbiton's - 'Visual Impact & Landscape Character Assessment, Factory Lane Site, Cattawade, Brantham, Suffolk.' Where they state under 'Scheme Proposals'

- The housing is to consist of mostly two storey dwellings with an element of three storey units to provide variety and orientation at key points.
- The Industrial Zone is to be located around the retained ICI plant at the eastern end and one of the three storey free- standing building in the central part of the estate land to the south of Factory Lane. The new buildings will be of varying floor areas to allow a range of occupants and heights of two to four storeys.
- The small leisure element is to be positioned at the entrance to the landholding adjacent to Factory Lane. It will potentially comprise a prominent feature hotel building of five storeys and pub with restaurant, together with an element of small food retail uses, forming a gateway at the entrance to the scheme.

Everyone who lives and works in this area agrees that the present industrial site is an eyesore, especially as it is positioned within an area of outstanding landscape. Plans to build a five storey hotel and leisure centre, four storey industrial units and three storey dwellings should be reviewed and restricted to a height more in keeping with their location within 2 AONBs.

By clearing and decontaminating the brownfield site, St Francis Group and Babergh District Council has an opportunity to seek the design and development of a mixed use scheme that will enhance and complement the existing landscape.

The logical scenario would be to allow most of the brownfield site to revert to its natural state. The National Trust or RSPB would be an ideal partner for such a venture. Its integration into the adjacent SSSI and AONBs could be managed without the need for costly flood defences. It would be an added attraction to boost the key tourist sector in Suffolk. Its close proximity to a mainline station would also help to give it a low carbon footprint. A proportionate amount of low cost housing, hotel and visitor centre could easily be accommodated within the brownfield footprint .

The poor road connections in Brantham preclude it from attracting low added value manufacturing and distribution businesses, as the recent site experience demonstrates. However there are a number of key employment sectors identified by Suffolk County Council that could be attracted to this development. These include:

- Creative and IT companies
  - These may include a number of disciplines such as advertising and marketing, architects, games developers, software developers, fine artists, model makers, film and video, server farms etc, who do not require the transportation of goods and materials and would welcome working in a rural location with fast rail link to London.
  - SWOT analysis by Suffolk CC shows a requirement for higher broadband connectivity as per recent BT initiative in other rural areas.
- Leisure and Tourism; Heritage and Education
  - Small scale visitor centre, art gallery and hotel and leisure facilities, easy access to watersports; international pathways through areas of outstanding beauty (including

- unspoilt fields of Proviso D); local heritage, creative and ecological workshops attracting ornithologists, artists, photographers, school visits, etc
- Look at local models for developing cultural heritage sites - and learn from their experiences - e.g. Sutton Hoo, Snape Maltings.
- Look at national success stories - e.g. The Hepworth Wakefield,
- Agriculture, Food and Drink
  - Retention of Proviso D as cereal growing arable land and unspoilt connecting footpaths keeps natural beauty of area for local residents, workers and visitors.
  - Local food and drink production and retail outlets would attract visitors to the site. Successful local examples can be seen at The Suffolk Food Hall overlooking the River Orwell, Jimmy's Farm on the A134 and Hall Farm in Stratford St Mary.

At present neither St Francis Group, nor Babergh District Council has shown any 'Vision' or imagination as to how this site could be developed, beyond bog-standard industrial units and a housing estate.

Perhaps an iconic 'grand design' for the site could be the winner of a RIBA Competition?

**Conclusion: all options of using the brownfield land have not been thoroughly explored**

#### **9. Has sufficient public consultation and engagement been undertaken to consider the inclusion of the Proviso D land at this stage?**

Prior to a public meeting in June 2013, organised by the Brantham Parish Council, which was attended by representatives of St Francis Group and Babergh District Council, there had been no engagement with the local community to seek reaction to Proviso D.

The large number of parishioners who attended the meeting, together with Brantham Parish Council were unanimous in their opposition to Proviso D, as demonstrated in the large number of objections submitted to Babergh District Council in July.

There does not appear to be any local opposition to the Core Strategy prior to the introduction of Proviso D to build on greenfield land.

Despite the lack of consultation and engagement with the parish council and the public, St Francis Group, presumably with a nod of unofficial approval from Babergh DC, has secretly purchased a number of properties in Brooklands Road with a view to demolishing them and building a link road to the housing estate they are proposing in Proviso D. This has angered local residents.

At a Brantham Parish Council Meeting held on 4<sup>th</sup> September 2013, members of the public were invited to ask questions to Simon Barrett (Vice Chair of BDC Strategy Committee) and Sue Dawes (Economic Development Officer and Project Lead for Brantham Development Area).

As with the public meeting there was unanimous objection to Proviso D by the public, parish council and local councillors who represent Brantham.

At this meeting Parish Councillor Alistair McCraw asked a number of questions regarding the lack of oversight and democratic process by Babergh Strategy Committee and the elected councillors of BDC in regard to Proviso D. The parish council and local residents await a response to these questions from Babergh District Council.

**Conclusion: At present there is unanimous opposition to Proviso D by the local residents of Brantham and their elected representatives at Parish and District Council level. Further engagement and consultation with them is unlikely to change their view and is a waste of their**

**time and public money which would be better spent on finding a viable solution to developing the brownfield site, where there is unanimous agreement on action.**