

DC/23/04109 - Former HMS Ganges Site, and consider any additional information received

Application under S73a for Removal or Variation of a Condition following grant of Planning Permission B/12/00500 dated 18/12/2015 Town and Country Planning Act 1990.- To vary Condition 27 (Approved Plans)

At their extra meeting held on November 9th, 2023, the Shotley Parish Council resolved to recommend a refusal of this planning application.

The condition that pertains to the spine road is one that Councillors and parishioners feel very strongly about, and its removal was deemed unacceptable and objected to, particularly as it was conditional to the planning permission being given originally. It is also subject to the existing S106 agreement between the applicant and other relevant parties, with agreed solutions to be put in place in the event of it not being met (bond). As this, and some other proposed amendments were fundamental to the granting of planning permission, members felt that developers should not simply be allowed to revoke them because of cost, additional dwellings, or any other reason.

There was also some disappointment at the fact that a considerable number of changes had been included in one single application of this type, and that there was the potential, if successful, that it would be followed by others. It could be argued that costs have increased, which may give rise to the justification behind some of the changes. However, so have house selling prices, and part of a developer's remit should be to balance the two in a way that is considerate to local priorities and established communities.

There were several other concerns, which have been validated by the majority of statutory consultees, neighbouring parishes, and local residents, who have also either objected to the plans or issued holding objections.

Suffolk County Council Highways- A number of queries have been put to the applicant, such as traffic impact generation, unrepresentative traffic volumes on background traffic growth (data only goes back to 2021), the non-delivery of the spine road and how it could potentially affect various areas, and parking.

Suffolk County Council Growth, Highways and Infrastructure Team - Has warned that if the planning authority is minded to approve the proposal, it must be subject to securing the terms of the S106 agreement obligations, and if minded to refuse, the reasons must include the absence of securing those in a Deed, as lack of them would be contrary to relevant Development Plan Policies.

It is also noted that any increase in the overall number of dwellings and/or proposals for change of use requires an infrastructure assessment and that any additional S106 contributions arising must be accompanied by the Prior completion of a new Deed, in addition to potential additional planning conditions. The viability of the scheme is also queried in terms of the original Deed's (as varied) dated 18 December 2018) deferred conditions.

The Team also includes in their response requirements and considerations in terms of Education, pre-school provision, play space provision, transport issues, Libraries, Waste, Supported Housing, Sustainable Drainage Systems, Economy Landscape and Heritage, Fire Service, and Broadband provision.

Historic England - Has expressed concern that the proposed changes would result in harm to the historic significance of the designated heritage assets in terms of the NPPF. They also require clarification in terms of the proposals near the Martello Tower, which is within the scheduled area and would require further consideration. They have recommended against the demolition of Buildings 6,9, 10 and 11 due to the harm that their demolition would cause to the historic significance of the conservation area and resulting detracting from the setting of listed buildings. The same principle would apply to the proposed demolition of no. 17, 2, 3 and 16. Further harm could also be caused by the proposed attenuation pond within the scheduled area of the gun battery. They also question whether the amended scheme would achieve the NPPF's aim of promoting sustainable development which delivers public benefit while minimising harm to the historic environment.

Historic Buildings and Places - Object to the applications on the grounds of loss of additional buildings associated with the former HMS Ganges, which would harm the character and interpretation of the site itself, as well as the Conservation Area. The survey provided does not appear to show any structural failure that would prevent most of them from being restored and adapted as additional housing.

Suffolk County Council Flood and Management - Has registered a holding objection. This is due to the need for the applicant to resubmit the surface water drainage strategy in line with the latest LLFA SuDS, and the need for the applicant to ensure that individual plot soakaways are utilised and that any adoptable roads have a separate SW drainage system.

Essex County Council Place Services (Landscape) - Has recommended improvements to the vista between Martello Tower and the Parade Ground, blue and green infrastructure for the balancing ponds and hard parking areas, softening of the proposed highway treatment of the turning head to the new care provision entrance, removal of *Viburnum tinus* from the indicative planting palette, and soft landscaping in several areas.

Babergh District Council Public Realm - Has noted discrepancies between the Landscape strategy and the proposed felling plan, which need to be aligned before the holding objection can be removed.

Heritage - Consider that the application causes various levels of harm, ranging from very low level to significant, of nearby listed buildings, the character and appearance of the conservation area, the listed swimming pool, and the non-designated assets which are being proposed for demolition.

Twentieth Century Society - Objects to the demolition of Drake, Hawkes and mess buildings, which have significance for their group value and historic interests as part of the

development of the naval use in the twentieth century. Furthermore, the proposals will fail to conserve or enhance the Shotley Gate conservation area. Arguments of poor condition are irrelevant, and efforts should be made to retain, repair, and convert such buildings for beneficial future use, particularly as the applicant has demonstrated that this can be the case (as with Nelson and Vincent).

The Shotley Peninsula Cycling Campaign - Suggests that the proposed changes would see a noticeable intensification in the use of the site and believes that they should have been advertised as a new planning application, subject to a much wider consultation. Their concerns include a significant increase in built development and other uses on the site, the impact this increased traffic could have on cycling on the Shotley Peninsula, and the closure of the road link from the site onto King Edward VII Drive, which will mean a longer and more dangerous approach, along the existing roads, to the Marina and related facilities.

Public Health - Has reported that the assessment is incomplete and that some data inconsistencies are evident when comparing to the Planning Statement. They also allude to the fact that the May 2023 version of the HIA is referred to as “light touch” and without stakeholder engagement, when in fact a full HIA should have been undertaken due to the variations proposed in terms of additional dwellings, highways, and services.

Neighbouring Parishes:

Harkstead – Recommend refusal and believe that proposals should not have been submitted under a S73 application, but treated as a new application, subject to wider consultation.

Woolverstone – Recommend refusal and has provided an extensive list of reasons for doing so.

Freston – Recommend refusal, based mainly in the increase of traffic and difficulties at Freston crossroads.

Chelmondiston – Recommend refusal based on the impact on the highway network.

Some of the main planning policies taken into account in our deliberations are as follows:

The National Planning Policy Framework (NPPF) (paragraphs 7, 8, 199, 200, 202, 206)

The Planning (Listed Buildings and Conservation Areas) Act 1990 (paragraph 66 (1), 72)

Babergh Core Strategy and Policies [2014] including Policy CS1, Policy CS11, Policy CS21

Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019