



**Response to Application B/16/01493**

**Notification under Part 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 - Change of use from B1 (a) offices to (C3) 21 no. dwellings.**

**Summary and Understanding**

Development is not permitted where the building is on Article 2(5) land, is a Listed Building or is within the curtilage of a listed building or the site is, or contains, a Scheduled Monument, or is or forms part of a safety hazard area or military explosives storage area. This does not appear to be relevant in this situation, but the Wardle Storey war memorial is adjacent to the site, and may be of listed status.

Brantham Parish Council would therefore comment as follows:

**Britannia House.**

**B/16/01493**

**Introduction**

Current and proposed land use of the Brantham Regeneration Area.

It is understood that the approved Regeneration Plan is intended to find sustainable use for the brownfield site. The recent Outline Planning Permission granted for the Greenfield site is based on the economic unsuitability of the Brownfield site for housing development. This was based upon professionally obtained Site Contamination surveys, Flood risk Assessments etc, and Traffic Surveys, all of which were accepted as valid reasons for the granting of that Outline Planning Permission.

Policy CS10 (Paragraph A.) clearly states “The land north of the railway line , being the former Wardle Storey and ICI (now ITW) works sites, form the priority area for redevelopment, where new and retained employment land uses should predominate in principle” .

The comments below are generally based on that understanding

**Highways and Transport matters**

Section 2.11 of the supplied Transport Plan advises “*The emerging Local Plan identifies Brantham as a Hinterland Village but recognises the fact that the wider Brantham regeneration is likely to change its status and as such Brantham is considered to be an appropriate and suitable location for residential development.*”

Brantham is not a core village and does not have the requisite facilities etc. to become one. The Regeneration proposals aim to generate employment possibilities but do not automatically provide any additional facilities or amenities within the locality of this application site. This appears to be a presumption, on the part of the Applicant, which is not currently supported by any published policy. This misunderstanding is being used as the basis for many of the within the traffic plan.

In short, these arguments and conclusions are based upon a presumed status which does not currently exist.



**Comments on the content of the Traffic Plan.**

(The numbers relate to the Traffic Plan)

**Generally:**

The submitted traffic plan is a generalised statement of National and Local Policy, with many inaccuracies.

**For example:**

The content relating to Babergh at sections 2.7 to 2.15 is clearly out of date.

Section 1.2 refers to an intended requirement of 30 residential units, forming an application to St. Edmundsbury Council.

The Plan is generally incorrect throughout in many of its statements, notably sections 3.4 to 3.17, and Section 5 and we attach detailed comments below.

There is an ongoing tendency to refer to the proximity of Brantham's many facilities and amenities which are not as numerous or as local to this site as is optimistically suggested by this Plan. Our comments below respond to those which can be clearly shown to be incorrect and non- supportive to this application.

3.4 This site does NOT have easy non-vehicular "access to the many amenities and facilities on offer, all of which can be accessed by means other than the private car given its proximity to the greater Brantham area."

See 3.11 below, and also the notes regarding presumed facilities and amenities given above

3.6 "The site is immediately within 400m of all of the bus services on offer....."

The closest bus stop is on the A137 /Cattawade Street junction which is actually 635m from this site, and not 400m as stated.

3.7 "*It is noted that the Brantham Regeneration will bring forward improvements to bus based public transport which will significantly enhance the sites' accessibility by bus confirming its suitability as a sustainable location for residential development*"

This statement is wholly dependent upon the satisfactory completion of both the Brownfield and Greenfield redevelopment. This is still subject to agreement of detailed design with the Local Authority, and is not within the gift of the current applicant.

3.8 "*The site is also within 2km of Manningtree Rail station with its fast and frequent services to Ipswich, Colchester, Chelmsford and London*"

This is almost correct, it is actually slightly more than 2 km, and the calculated travel times take no account of the footpaths, bridge and underpass problems at Manningtree Station, which is also dependent upon the satisfactory completion of the road etc. improvements note above, and is also not within the gift of the current applicant.

3.11. "With respect to pedestrian access, a walk time of ten minutes is generally considered the maximum acceptable to directly access any local facility or amenity and equates to a distance of 800 metres".

Walking 800 meters from this site, along Factory Road will take one as far as the vet's surgery and the Crown PH within the acceptable limit stated. Walking directly up the public footpath by the playing field will take one a little way up Brooklands, or a similar distance up Brantham Hill. That is insufficient to reach the closest food store (1500m) or primary



school.(1200m)

3.12 *“The site is within reasonable walking distance of much of Brantham and the range of facilities and amenities on offer.”*

See 3.11 above, and also the notes regarding presumed facilities and amenities given above.

3.13 *“It should be noted that as a result of the now permitted Brantham regeneration area proposals, the site will benefit from being in very close proximity to a range of new facilities and essential amenities.”*

The current Brantham Regeneration proposals do not include a guaranteed “range of new facilities and essential amenities” within the locality of this application.

See 3.11 above, and also the notes regarding presumed facilities and amenities given above

3.14 *“In consideration of the above, the site is well located in terms of transport accessibility and as such is an eminently suitable location for a sustainable residential proposal.”*

See 3.11 above, and also the notes regarding presumed facilities and amenities given above

3.15 The applicant’s agent has clearly not referred to “Crashmap” within the recent past, as this currently shows 9 “slight” incidents and one fatality between School Lane and the county boundary on the White Bridge.

3.17 Generally, this Traffic Plan appears to have been prepared in isolation, and not to address the details of the Traffic Plan supporting the Brantham Regeneration Outline Planning Permission.

#### Summary

In short, this Traffic Plan appears incorrect in many aspects and in places not applicable or accurate to the current application, and for that reason should not be considered as providing suitable or sufficient support to the application.

#### Comments on the Contamination Survey

The Outline Planning Permission recently given for the Brownfield Regeneration (ie. the land immediately surrounding all sides of the application site) was supported by extensive soil and ground contamination surveys and remediation proposals.

The supplied executive summary of the contamination survey prepared for this application advises that there is no significant contamination. It is understood that this relates to a limited number of test sites across the site and that this site has not accommodated industrial usage.

The Regeneration area is however defined as a brownfield site, with a high water table and high porosity, which might have supported the movement of contamination from the more industrial areas.



**Summary**

Generally, this report appears to have been prepared wholly in isolation, where it should be considered alongside the findings and information prepared for and supporting the Brantham Regeneration (Outline Planning Permission).

**Flooding**

The north side of the brownfield site is located within a Flood Zone which benefits in part from existing flood defences. All existing housing close to the River (the old Cattawade hamlet) exist outside of the Flood Zone limits but benefit from those defences, as will the proposed greenfield development.

The current application site is however fully within the Flood Zone area and, if approved, will be the only residential development that will lie within the defined Zone.

The tidal flood risk level within the application site is shown as Low. It should be noted however that the Environment Agency flood maps show a clear area of medium risk from flood seepage from the railway tunnel, which extends almost to the application site.

The application site area is also shown as being medium risk from fluvial (surface water) flooding. This site may well require specific and additional rainwater attenuation arising from the inevitable runoff from the Greenfield development, once constructed.

**Summary on Flood Conditions**

Generally, this report should be considered alongside the findings and information prepared for and supporting the Brantham Regeneration (Outline Planning Permission). The two may well affect each other, with any residential criteria taking precedence over commercial.

Additionally, the report appears not to fully address the information available on the Environment Agency flood maps.

**Overall Summary**

The Brantham Regeneration proposals are intended to promote the regeneration of commercial use, and employment potential of this site.

Policy CS10 (Paragraph A.) clearly states “The land north of the railway line, being the former Wardle Storey and ICI (now ITW) works sites, form the priority area for redevelopment, where new and retained employment land uses should predominate in principle”

The current application, being for a residential development, therefore detracts from the fundamental criteria stipulated for Brantham Regeneration.

Brantham Parish Council finds therefore that the submitted documents do not demonstrate that the criteria for Prior Notification and Approval have been met, and would recommend that this Application be rejected.