Dear Sir/Madam,

YOUR REFERENCE: B/15/00263

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ADDRESS: Brantham Industrial Estate and land to the north and the peninsula (part of), Factory Lane, Brantham, MANNINGTREE, CO11 1NL

PROPOSAL: Hybrid application for regeneration of existing industrial estate and development of adjoining land. Outline: Mixed use development to comprise 320 dwellings; 54,123 sqm of Class B1, B2 and B8 employment uses; 1,440 sqm of Class A1, A3, A4 and A5 retail uses and Class D1 community uses; provision of public open space and new playing pitches (Class D2). Full: Proposed new access from Brooklands Road; improvements to Factory Lane; new on site road network and structural landscaping; and foul and storm water drainage infrastructure (As amplified by Transport Assessment (Rev B dated April 2015) received on 7 May 2015).

We refer to your consultation in respect of the above site. Brantham Parish Council (BPC) would like to submit our concerns regarding this Application.

**PROPORTIONALITY**

* A proportionate level of residential development, as described in BDC Core Strategy (Policy CS10), is not clearly defined but the Council regard the proposed proportion of 25-30% to be unreasonable for the proposed infrastructure to support.
* We also find that the provision of amenities for the village is vague and insufficient considering the scale of development and are concerned that any future funding for these, from Section 106 money, is likely to be swallowed up by roads and schools.
* Much of the evidence base provided in the Application is at complete variance with the experience and knowledge of the community most affected, Brantham. There are also a number of simple errors of fact.

**AREAS OF CONCERN**

* The land proposed for the housing element would be the most distant from the A137 in the village. Both the internal road structure and the access points onto the A137 are almost certain to prove inadequate under real conditions.
* The lack of even a token provision of social or low cost housing.
* No serious consideration or provision has been suggested for the Manningtree Rail Crossing. This will have a huge impact upon both industrial and residential development and it must be properly addressed if the proposals are to work.
* Sewage capacity is deemed to be capable of absorbing the proposed housing. Existing problems appear to be ignored.
* Wildlife, Water, Environmental and Flood risks are being addressed by other bodies more qualified to comment, but we note their comments and suggested conditions.
* The provision of alternative transport links is also unworkable. The cycle way proposed is virtually identical to the existing poor provision and any ‘shuttle service’ to the station will face exactly the same constraints as at present.

**VIABILITY**

The Planning Inspectorates final conclusion on this part of the Core Strategy states:

*171. However the proposed modifications (****MM 25 and MM 26****) to address the potential of the Proviso D land is conditional on the submission of viability evidence to justify residential development on some of the additional land. On that basis, the extent of the evidence justifies the ‘conditional’ inclusion of the Proviso D land, and this in turn adequately justifies the allocation of the main Brantham development. It is the most appropriate option when considered against reasonable alternatives*.

* Viability evidence and studies appear to have focused entirely upon the costs of remediation and flood defenses and the requirement therefore of all of the proviso D ‘Greenfield’ land to cross fund such costs.
* The essential purpose of Policy CS10 is to achieve Industrial Regeneration on the Brownfield area, specifically to create employment. A figure of 500 EFT in the lifetime of the Core Strategy has been used (reduced from an earlier figure of 1000). This must be considered as the most important ‘conditional’ justification and central point of the entire application. It does not appear to be addressed at all.
* Brantham Parish Council believes that the commercial viability of the Brantham Regeneration Area is the key point here. An application of this complexity necessitates, such a study.
* The declared interest of at least one Prime Space user and a significant number of secondary users should be sought before proceeding. If these already exist, that should be made known, with relevant timeframes, and within reasonable limits of commercial confidentiality.

Useful evidence of commercial or industrial viability is too important to be allowed to rest with the developer alone. The applicant will obviously present the best case possible. Supplying an infrastructure and hoping employers will come is not sufficient. Economic Development is one of the primary functions of Baberghs Core Strategy and responsibility must lie there.

**SUMMARY**

* Historically, the isolation of this site was the very reason it was originally developed. Over 100 years later, and with very poor access to major Arterial routes (A12, A14, A120) this isolation, compared to other available sites, will make this site unattractive to potential employers.
* BDC risks needlessly sacrificing an area of Greenfield land, against the overwhelming wishes of the community, to replace an ugly ‘white elephant’ with a more attractive, but unused, one.
* With Baberghs housing requirement under the Core Strategy already being met elsewhere, incentivised funding should not form any part of any decision made. These should rest upon the purposes of the Core Strategy Policy (CS10) itself, being employment led and capable of delivery.

Brantham Parish Council believe the present application to be deeply flawed, over optimistic and unlikely to fulfill BDC’s policy objectives. We urge Babergh District Council to take a viability based approach, with a focus on results, and to look for further guarantees to ensure that these points are addressed.

We thank Babergh DC for the extension granted during the recent election period and look forward to contributing to further discussion and consultations on these issues.

**Brantham Parish Council.**

15 Palfrey Heights, Brantham, CO11 1SE

[branthamparishclerk@yahoo.co.uk](mailto:branthamparishclerk@yahoo.co.uk)

07702 490212