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**BRANTHAM PARISH COUNCIL**

**RESPONSE TO CONSULTATION FOR BRANTHAM REGENERATION AREA**

**BD/15/00263**

**DECEMBER/JANUARY 2016**

YOUR REF: B/15/00263/FUL/SMC.

SUBJECT: Brantham Industrial Estate & Land to the north & the peninsula, Factory Lane, Brantham, MANNINGTREE, Essex.

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).

Amendment(s) to Application - As amplified in the letter from Boyer Planning dated 7 December 2015. Documents published on our website on 15 December 2015.

1. Highways and Transport Plans
2. BPC Footpath Survey Results
3. Flood Risks and Drainage
4. Environmental Issues



## **1. HIGHWAYS AND TRANSPORT PLANS**

### **Comments on SFG design response to SCC Highways consultation response**

Transport Assessment referring to the Manningtree Station and roundabout	<p>The supplied response is technical and requires to be fully assessed by SCC. BPC would wish to be able to comment further on SCC response.</p> <p>We note that this document supports a proposed priority reversal at the Manningtree underpass, favouring northbound traffic. It further lists the length of expected tailbacks towards <b>Brantham</b> and suggests that this would alleviate traffic problems in Station Road, Lawford and at the associated roundabout. This approach would only make sense if the document were supporting a planning application on the Essex side. Since a clear attraction of housing in Brantham would be access to the Railway Station we find this to be self-defeating. All southbound journeys, by any means, would be affected by this suggestion.</p>
Junction mitigation - Brooklands	<p>The supplied response requires to be fully assessed by SCC. BPC would wish to be able to comment further on SCC response.</p> <p>Initial comments question the forced nature of the design, requiring a &gt;3m retaining wall and a necessarily steep road and footpath on a residential development.</p> <p>SCC Highways state that 43% of commuter traffic (from the site) is predicted to travel north and therefore likely to use this junction. That equates to <b>138</b> dwellings of the full 320 proposed. There are currently approximately <b>300</b> dwellings in this road network area that would be likely to approach the A137 by the two routes to the the end of Palfrey Heights. Fundamentally these form a circle around the school.</p> <p>Assuming a similar proportion of commuter traffic from the 300 this would see a <b>46%</b> increase in such traffic. Including local use (to reach the shops, school and all other local facilities) plus delivery vehicles, buses and service vehicles to and from both areas we do not believe that junction mitigation as described is sufficient improvement to the road network. Safety is a prime consideration and we do not feel this has been sufficiently addressed.</p>
Junction Mitigation - Cattawade	<p>The supplied response requires to be fully assessed by SCC. BPC would wish to be able to comment further on SCC response.</p> <p>Initial comment is that the “wait and see” approach proposed by SCC</p>



Pedestrian and Cycle  
Improvements

appears the preferred response to us. This is due to the apparent non-maintenance of the southern footpath along Cattawade Street/Factory Lane, especially at the tee-junction. This is simply inadequate for safety.

From the paragraphs above it follows that SCC predict that **57%** of commuter traffic (from the residential site) will travel south using Factory Lane to access the Cattawade roundabout and the A137. This equates to **182** dwellings of the full 320. There are, again, approximately 300 dwellings at the lower end of the village which would seek commuter access via this junction.

Assuming a similar proportion of commuter traffic from these 300 in this feeder network this would see a **60%** increase in such traffic. Non commuter use, current employment use, delivery and services use remain to be properly assessed.

Whichever of the mitigation proposals is chosen it seems to BPC that neither is adequate to deal with predicted traffic flow. In particular, the mini roundabout option leaves a very short distance to the A137, creating, in effect, a double roundabout.

The supplied response requires to be fully assessed by SCC. BPC would wish to be able to comment further on SCC response.

Initial thoughts are that, while any improvement is to be welcomed, the proposed shared two-way cycle way and footpath is not safely achievable for much of its length along the A137, and especially through the railway tunnel, where there appears to be insufficient width to safely accommodate both this and the proposed single – way vehicle traffic. A shared two- way pedestrian and cycle way is inherently dangerous in any case. We also note that the current footpath along the A137 is prone to breaking up at the verges, the hedgerows and ditches. A sustainable and supported surface, unaffected by this, would also be necessary.

The cycleway/pedestrian path cannot achieve the desired width and will certainly require new lighting alongs its entire length, especially where the required design width cannot be achieved.

The advisory cycle lanes proposed along Factory Lane, barely leave enough 'central 'carriageway for a single car vehicle. BPC fears that these will only provide the illusion of safety for cyclists and that



Travel Plans -  
Residential

accidents and/or delays for all traffic will result.

It is appreciated that these Plans cannot be fully detailed at this time, and are intended to be developed as an ongoing action throughout detailed design stage and prior to occupation. It is also understood that the criteria presented are compliant with published guidance.

All of the criteria and the suggested strategies are however wholly reliant upon voluntary acceptance and implementation by the future residential occupants. BPC seriously question whether the likely uptake of Personal Travel Plans, Car Sharing, Car Club, Website, Cycle Buddys, and Annual Bike Surgeries, with or without a Coordinator (TPC), will achieve the targeted 10% reduction in the percentage of single car journeys. We also note that Home Food Deliveries require, often bulky, vehicles to make them.

The 10% reduction from 83.67% to 73.67% for these traffic movements, we believe, must be viewed in the context of the additional 320 dwellings proposed added to the existing 600 dwellings (approx) already in the relevant road network. It is otherwise misleading.

Were the Residential Travel Plan to achieve its target for the new houses it would result in a **47%** increase in such journeys in the road network (North and South). If the same reduction were applied to the entire road network area (roughly Palfrey Heights, Brooklands, New Village, Temple Pattle, Cattawade and the Proviso D houses) it would still see an increase of **35%** of such journeys.

The supplied response requires to be fully re-assessed by SCC with regard to the adequacy and accuracy of what is presented and whether SCC considers that the travel plan is currently suitably developed at this stage, and whether it is considered suitable to be taken forward. It is not “fully detailed” as required by SCC.

BPC would wish to be able to comment further on SCC response.

Travel Plans -  
Workplace

Similar to the above, with further comment made almost impossible due to the unknown nature of what might eventually be built on the Regeneration site. The absence of any figures or analysis for employment use and employment travel concerns BPC greatly. There is no mention of existing employment use and travel, which might provide a starting point. In view of the fact that employment is the purpose of the industrial regeneration that the entire proposal rests



Network Rail  
Consultation

upon we find this to be a serious omission. Even allowing for the fact that the application is at outline stage we think it wholly inadequate.

The supplied response requires to be fully assessed by SCC with regard to the adequacy of what is presented and whether SCC considers that the travel plan is currently suitably developed at this stage, and whether it is considered suitable to be taken forward. It is not “fully detailed” as required by SCC.

BPC would wish to be able to comment further on SCC response.

This states specifically that Network Rail will object to the Application should the existing footpath and rail crossing onto the sea-wall public footpath continue as existing.

BPC has carried out a local survey with regard to the closure of this arrangement and that is attached to these comments. (BPC Footpath Survey Results)

It should be noted that Network Rail propose as a workable solution that the public footpath be relocated to the underbridge crossing within the regeneration site. This is achievable only if the developer is required to create a new footpath on the south side of the railway so that this can connect with the existing footpath.

BPC would expect this entire issue to be a reserved matter for later resolution.

## **2. BPC FOOTPATH SURVEY RESULTS**

### **Brantham Parish Council Footpath Survey results**

#### **Introduction:**

This survey was carried out by volunteers who were members of Brantham Parish Council or their direct relative/spouse.

The survey was conducted between Monday September 14 and Monday October 5 inclusive at different times between the hours of 0700 and 1900. Surveyors would normally volunteer for one or two hours at a time so there were not people there during the whole of this time and some days may have had no surveyors at all. Surveys were carried out in a variety of weather conditions.



### **Location of volunteers:**

The volunteers were asked to base themselves at one of four specific points in order to meet people visiting the area from a variety of different directions. These points were: On the path between old Factory car park and the Decoy Pond; at the pylon opposite the proposed open space and near the path leading to the level crossing; on the concrete path between the sewage works and the railway bridge and on the river wall by the estuary. These points were chosen to enable the volunteers to meet as many users of the paths as possible approaching from a variety of directions.

Our aim was to speak to a minimum of 100 unique users. Records were not taken of people who had already answered the questionnaire, people who passed by when another person was answering or people who chose not to answer (a number said they weren't local or were holidaying here and did not feel their answers would be helpful although some visitors from further afield did choose to take part.)

### **Overview:**

The purpose of this survey was to find out local people's views on two main issues: The railway foot level crossing and the provision of public open space in any development as per the current planning application. We were aware that SFG had organised a survey which focussed on these areas as well as others such as the SSSI and the estuary.

The railway crossing is of interest to our survey because it may be under threat either through the development plans or as part of the 'Norwich in 90' train service campaign although at the moment there is no definite suggestion of this but a number of foot crossings in Suffolk may be under review as part of 'Norwich in 90' and we must be mindful of this.

The Parish Council has been asked to attend a place shaping meeting regarding the Public Open Space element of any development on or around the factory site hence we felt it important to gauge the views of local people before attending such a meeting.

### **Survey results:**

Numbers questioned: We were looking for responses from individuals and did not count numbers seen by any one surveyor (whether or not they participated in the survey). We took a name, gender, age-range and postcode from those who completed the survey only as a way of ensuring that we were not all speaking to the same people each time. The result was 114 individual responses. All but 7 were from the CO11 1\*\* postcode area. Five were still relatively local Mistley, Freston, and Ipswich the other two were from further afield visiting the area.

Around 72% of those questioned used the network of paths either daily or several times a week. 5% used the paths rarely, 22% used them occasionally, 20.5% used a few times a week and 52% used the paths daily.



The vast majority were dog walkers but others were walking or running to enjoy the countryside and a traffic free environment. A small number were on their way to somewhere else. We did not keep records of which respondents had a dog with them at the time of the survey.

### **Railway Crossing**

84% of those questioned said they do use the railway foot crossing. 93% said they would definitely or possibly support a campaign to keep the crossing open (such as signing a petition or writing a letter of support). Of those 89% answered 'yes' they would support such a campaign and 11% said possibly.

72% of the total number questioned said they would be concerned or extremely concerned if the railway crossing was closed. Almost everyone who was questioned said if the crossing did close they would want to see an alternative means of crossing the railway included in the plans such as a new bridge or making use of the foot tunnel in the current factory site and building a new footpath from the tunnel to join the riverbank path that goes to the level crossing.

### **Park Provision**

The majority of respondents wanted the public open space left as a country park or woodland with minimal or no recreational facilities provided.

63% of those questioned were aware of the plans for the public open space/park area

Opinion was about half and half on whether it was important to have a park.

If the development went ahead respondents would like to see:

The open space left as natural as possible such as a country park or woodland 77 (69 %); An enclosed area for off lead dog exercise 16 (14%); Tarmac paths 12 (11%); Swings/playground area 12 (11%); Skatepark 6; Sports pitches/pitch & putt 9; Public toilets 5; Car parking 1; No answer given..... 15

As far as funding the upkeep/maintenance of such a facility 65 respondents (58%) felt that this should only come from any additional council tax revenue raised by the new houses.

31 (28%) felt that it should not be funded by the parish council but in another way (the majority said the developer). Six respondents were happy to see everyone in the village pay more council tax to support such a facility and ten respondents either gave no reply or felt there should not be a facility that required money to be spent on maintenance.



### **Conclusion and recommendations**

There appears to be widespread support from users of the footpaths in this area to keep the railway crossing open or to provide an alternative means of access to ensure that the path along the riverbank is not an 'out and back' walk.

Brantham Parish Council made the following recommendations at the parish council meeting on January 6 2016:

- That any proposed closure of the railway foot level crossing should be subject to its own public consultation period and an alternative means of crossing the railway in the event of the crossing closing should be included in the development plans.
- That the public open space is left as natural as possible in the form of a country park or woodland and that facilities that are costly to maintain are not included unless a sponsor (such as the developer) is prepared to pay for their installation and upkeep.
- That a secure enclosed area for off-lead dog exercise and dog bins are included in the public open space.

### **3. FLOOD RISKS AND DRAINAGE**

1. EA in their letter of 25.6.15 to BDC removed their objection providing BDC was satisfied the development was safe for its lifetime and subject to various conditions.

2. One of the conditions was the construction of secondary Flood Defences, including a 5.63m. AOD earth bund prior to occupation. No plan has been seen showing where or how this will be done. It seems a substantial construction that may be located at Factory Lane or thereabouts.

3. There is, apparently, a Flood Warning and Evacuation Response Plan. This should be seen and must coordinate with Brantham Village Emergency Plan.

4. The statistical basis of calculating a 1 in 100 or 200 year event is, as we are all aware in the light of recent events, being reconsidered. Sir James Bevan, Chief Executive of the EA, " something is different " on the 6th. January to the Select Committee when discussing the assessment of flood risk. Such assessments, as here, need therefore to be handled as somewhat less than mathematically certain.

5. It is a condition that there should be details of who will maintain each element of the surface water system. These have not been given.

There are other conditions and requirements that the EA stipulates BDC will need to consider and be satisfied with, and these are summarised in their letter of 25.6.15.



#### **4. ENVIRONMENTAL ISSUES**

After studying BDC's Environmental Protection Team response, the following three points seem to be significant to the application:

1. "The proposed development site is not a desirable area for development by virtue of the existing noise climate". (Joanna Hart, BDC Senior Environmental Protection Officer)

The measurements undertaken by the Environmental Team show that the existing daytime noise levels are above the BS8233 and World Health Organisation (WHO) guideline values to avoid moderate to significant annoyance.

BS8233 states that it may be acceptable for development to take place in higher noise areas, such as city or urban areas. This cannot apply to this site by virtue of the fact that it is located in a rural area close to a river estuary. This is particularly relevant in view of the RAMSAR, SSSI and AONB considerations.

2. The predicted increase in traffic noise level will have a major and unacceptable impact on existing dwellings in Factory Lane, resulting in a severe loss of amenity for these residents

3. In order to mitigate the impact of traffic noise, both existing and new dwellings on the development site, closest to Factory Lane, will need to keep their windows shut at all times. BPC considers this to be an unacceptable constraint. Retrospective mitigation for existing properties in respect of these noise levels may become necessary and BPC regard this as a matter that should continue to be monitored.

If you have any questions/comments about the response above then please do not hesitate to contact the Parish Council on the contact details below.

With kind regards,

**Brantham Parish Council**

15 Palfrey Heights  
Brantham  
Manningtree  
CO11 1SE

Email: [clerk@branthamparishcouncil.co.uk](mailto:clerk@branthamparishcouncil.co.uk)

Tel: 07702 490212

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Parish Council

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