



BRANTHAM PARISH COUNCIL PLANNING COMMITTEE

Minutes

22 May 2019, 7.30pm at Brantham Village Hall

PRESENT: Mark Aherne (MA)
Chris Elliott (CE)
Eric Osben (EO) (Substitute)
Paul Saward (PS) (Chair)

IN ATTENDANCE:
Sarah Keys (SK) (Clerk)
2 members of the public

PLC 05.19.01	APOLOGIES FOR ABSENCE Clare Phillips (CP)
PLC 05.19.02	MINUTES The minutes of the meeting on 27 March 2019 were approved and signed as a true record of the meeting.
PLC 05.19.03	DECLARATION OF INTEREST None
PLC 05.19.04	PLANNING APPLICATIONS DC/19/02054 Marantha New Village Brantham Manningtree CO11 1RL Two-storey side extension BPC MADE NO COMMENT DC/19/01973 Land South Of Slough Road Brantham Outline Planning Application (some matters reserved) Erection of residential development of up to 65 new dwellings (including minimum of 35% affordable homes, with areas of landscaping and public open space, including vehicular access, and associated infrastructure works. PLEASE SEE COMMENTS ATTACHED AT APPENDIX A DC/19/00881 Land South Of Brooklands Road Brantham Submission of details under Outline Planning Permission B/15/00263 (FUL) - Appearance, Landscaping, Layout, Scale for 288 dwellings, public open space and associated infrastructure PLEASE SEE COMMENTS ATTACHED AT APPENDIX B
PLC 05.19.05	PLANNING RESULTS DC/19/01362 5 New Village, Brantham, Manningtree, Suffolk CO11 1SB Replacement cladding and erection of a lean-to front porch PLANNING PERMISSION GRANTED



BRANTHAM
Parish Council

	DC/19/01352 The Hawthorns Brantham Hill Brantham Manningtree Suffolk CO11 1SH Garage conversion PLANNING PERMISSION GRANTED
PLC 05.19.06	CORRESPONDENCE AND LATE PLANNING APPLICATIONS None
PLC 05.19.07	DATE OF NEXT MEETING Wednesday 26 June 2019, 7.30pm at Brantham Village Hall

MEETING FINISHED AT 7.48pm

SIGNED.....DATED.....



APPENDIX A

Brantham Parish Council

DC/19/01973 Land South Of Slough Road Brantham Suffolk

Outline Planning Application (some matters reserved) Erection of residential development of up to 65 new dwellings (including minimum of 35% affordable homes, with areas of landscaping and public open space, including vehicular access, and associated infrastructure works.

BPC would comment on the following materially relevant matters:

- The proposed site is outside of the current built-up area boundary (BUAB)
- The proposed site access road is, of necessity, sited within Slough Road, there being no access from within the BUAB.
- Consequently this development cannot be required as infill and must be regarded as ribbon development along Slough Road.
- The access road requires SCC defined sight lines, raising several issues:
 1. The sight lines must be maintained, with hedges being kept below 600mm.
 2. The sight line to the south extends in front of existing houses and consequently it may not be possible to maintain that sightline, possibly being on property in other ownership.
 3. The northern sight line necessitates the inclusion of a further area of land, defined by the sites red-line boundary, this extending from the proposed site access road to within meters of the East Bergholt parish boundary, and the East End BUAB. The frontage of this site thereby extends from the Brantham BUAB to the East Bergolt BUAB.
 4. If this application is allowed, this will effectively coalesce the two parishes of Brantham and East Bergholt. This contradicts Local Plan Babergh policy.
 5. This site was identified within the Local Plan consultation as being SHEELA site SS0210, clearly stating it as *not being suitable for residential development*. BPC can identify no reason why that assessment should now be any less valid.
 6. The Agricultural Land Classification (etc) included as a supporting document states that the land comprising the proposed site is Sub-grade 3A, being classified as BMV (Best and Most Versatile) agricultural land.

The report goes on to argue that this (high) grade of land is common in this area and consequently *“there should be no agricultural land quality constraints to the non-agricultural development of this site.”*

This is a convoluted argument with a spurious and misleading conclusion. To simply state something to be a valid conclusion does not make it so, and BPC would request that it not be given serious consideration. Land of this quality is not to be disregarded in such a way. Sustainability *as defined within the NPPF* requires resources, in



this case the ongoing usage of land, to remain available for future generations.

NB

It is noted that East Bergholt Parish Council have also raised comments on this application. These comments arise from the East Bergholt Local Plan and should therefore be given serious consideration, East Bergholt being the core village.

Other considerations, should this application be granted:.

- Strategic Housing Response – should this application be granted the recommendations should be implemented and applied as a Condition.
- It is noted that BDC pre application advice letter of February 28th 2019 stipulates *“Create a footway crossing point on the A137 to allow pedestrians safe access to the bus stops.*
There may be a need for pedestrian islands (we advise a survey is carried out to determine if there is sufficient time for the pedestrian can cross safely in one movement)”,
BPC note that that requirement is agreed within the developers supporting documents. Should this application be approved, BPC would look for this to be implemented prior to any development being commenced, and to be a controlled crossing. This should be as previously discussed by BPC with the SCC Councillor David Wood. This would serve an urgent need, already identified by BPC and supported by the Parish generally.
- It is noted that BDC pre application letter of February 28th 2019, regarding affordable housing, stipulates that the on site provision should equate to no less than 35%, consistent with Policy CS19, and that Officers would *encourage a scheme which is 'above and beyond' merely compliant*, providing significant benefit to the affordable need. BPC note that the Application supporting documents do not offer any increase in that requirement, being merely compliant. BPC would look to BDC to do more than simply encourage in this matter, and to achieve a reasonable increase, again by making this a Condition..
- BPC would express some reservations with regard to the affordable element not being provided, (eg) for financial viability reasons, and would protest in advance at any financial arrangement in lieu of their provision.
- Prior to any development commencing an agreed arrangement with a BDC Registered Provider must be clearly demonstrated.

Summary

Given the materially relevant reasons as above, BPC recommend that this application be rejected.



APPENDIX B

Brantham Parish Council

DC/19/00881 | Submission of details under Outline Planning Permission B/15/00263 (FUL) - Appearance, Landscaping, Layout, Scale for 288 dwellings, public open space and associated infrastructure.

Land South Of Brooklands Road Brantham Suffolk

NB The Developer, via the Boyer Design Group, has written to Brantham Parish Council (their letter of May 2nd 2019, attached hereto) outlining their practical response to the earlier BPC comments to the Reserved Matters.

This letter proposes that many of BPC comments have now been addressed by other consultees, as follows:

AONB – by consultation with SCC landscape consultant and BMSDC AONB dedicated officer. BPC cannot however see any proposals for the palette of materials or colors to be used, other than they will accord with the local AONB requirements?

Access for the disabled – by consultation with SCC Highways. Despite these reassurances, BPC are of the opinion that the north-south footpath running down the steepest slope on the eastern boundary is not suitable for the disabled, semi ambulant, or indeed the aged or infirm. This is NOT a footpath; it is a ramp and should be constructed to Building Regulation standards. There is little point in using such standards from path to house, but not beyond.

Sustainability (environmental) – by consultation with BDC Sustainability Officer. (See Summary below for BPC comments)

Sustainability (Car use, and parking) – by future (!) consultation with BDC via Travel Plan. Boyer note that this has now been agreed with SCC Highways. (See Summary below for BPC comments)

Housing Need/Density – No justification of the density has been offered. Boyer advise however that the proposal “reflects a fair compromise between the requirements and preferred mix from BMSDC; the local needs and the wider market demand. (BPC underlining). This would suggest that the preferred BMSDC mix has been ignored? (See Summary below for BPC comments)

Car Parking and Road Design – resolved via lengthy discussions with SCC Highways. It is noted that there is a suggestion to establish double yellow lines throughout the layout so as to prevent on street parking arising by commuters normally parking at Manningtree Station. It is understood that the local police are intending passing the responsibility for parking enforcement to BDC, so an early approach to BDC to achieve this if only in principle would be advisable, preferably within this application.

House Types – BPC note the alterations to the offered elevations. While this is but a “nod” to the local styles, these could still benefit from some refining of detail.

Summary

Brantham Parish Council recognises the alterations being offered in response to the earlier comments, which are repeated below, and which must remain our comments pending a decision.

Brantham Parish Council would however advise that it looks to BDC to fully interrogate the resubmitted proposals and details with a view to establishing that all requirements of the other statutory consultees have been fully addressed and preferably resolved.

BPC Comments on the overall SFG Application with regard to the original CS10 intentions.

It is understood that Outline Planning Permission has been granted and that this current application is to obtain approval of certain reserved matters. BPC’s comments on those reserved



matters are contained in the following section B.

BPC would however refer to the notes above and would remind those considering this application that the overall Application still does not address the Brantham Regeneration Area, except in the vaguest of terms. The Parish Council are aware that the Parish generally is of the opinion that the residential element, intended to facilitate the regeneration of the Brownfield (Employment) Area, is the only element being seriously considered. The Brownfield site remains unconsidered and, to the Parish, unlikely to be implemented within the foreseeable future. Direct requests to the Applicant regarding the viability and intentions relating to the Brownfield site are vague and much obfuscated.

BPC would appreciate **sharing BDC s initial, and subsequent, findings** on this matter so that it could inform the Parish, those who are most affected by this process.

Please now refer to Section B below regarding BPC comments on the Reserved Matters.

Section B – Comments on

Submission of details under Outline Planning Permission B/15/00263 (FUL) - Appearance, Landscaping, Layout, Scale for 288 dwellings, public open space and associated infrastructure.

Suffolk Coasts and Heaths AONB

Natural England have published a Notice that it proposes to make an Order designating land as Area of Outstanding Natural Beauty in both the London Gazette and the East Anglian Daily Times, as required by the Countryside and Rights of Way Act 2000.

Once confirmed by the Secretary of State for Environment, Food and Rural affairs, the Order will vary the boundary of the Suffolk Coast and Heaths AONB to include an additional area within Suffolk including the Stour Estuary. The public inspection of the draft variation Order closed on March 22nd 2019, and the extension can reasonably be expected to be implemented and to be in force by the construction of this Application.

While the Application site will not fall within the AONB, its eastern boundary, by the Decoy Pond, will then be immediately adjacent to the AONB.

It will then be reasonable to expect that the proximity of the AONB will require a high standard of design and elevational treatment, these being visible, and influencing, and views from within the AONB.

- The various elevational treatments proposed will be commented upon in detail later, but BPC would comment that -
- All elevations visible from within the AONB shall be treated as “Front Elevations” i.e. they will finished as the front elevations used to define the Rolling Field, or other House Character, Type.
- The various elevational treatments proposed will address the Palette of colours as suggested by the AONB Publication “Guidance on the selection and use of colour in development: Guidance”. The Dedham Vale AONB have already adopted such guidance and similar compliance will need to be ensured.

Access for the Disabled

It is understood that the existing site conditions are steep in some parts, and that legislation does not ensure suitable inclines etc. within outdoor areas, except where these address access to door thresholds etc.



BPC estimate that the western boundary falls on average at 1:18, and the eastern boundary at an average of 1:11, in places much more.

The winding nature of the road/pavements at the western end are no doubt designed to limit this incline, but this is not apparent, from the proposed layout, at the eastern end along the footpath running down to the Decoy Pond. The average incline at approx. 1:11 is already unacceptable for such users, and the path design would benefit from the occasional “dog leg” to reduce the steepness, and including for occasional level areas as rest areas.

BPC would request that BDC apply their own policies with regard to ensuring equality for the disabled in resolving this issue, wherever it may occur within this site.

It is understood that SCC as Highways Authority have a holding refusal based upon the submitted road design and it is to be expected that disabled access will be addressed within any amended road and footpath layout.

Sustainability relating to environmental considerations.

The Application refers throughout as to being a sustainable development. This appears to be as the definition contained within the NPPF. The Application however only refers in passing to its environmental credentials, and additional information needs to be provided in assessing the Application. Egg -

- Use of natural insulations
- Use of Triple glazing, and not only where sound insulation is required
- Use of communal heating systems
- Heat Recovery
- Solar Panels, PV arrays etc. as installed elements and controls.
- Installation of all infrastructure necessary for the supply of future electric car charging facilities, to both private and communal parking areas. (To avoid later disruption of common and private areas)
- Use of locally available natural materials. (E.g. clay tiles and NOT concrete copies, no use of slates which is not a local tradition.
- Compliance with Forest Stewardship Council (FSC) and Programme for the Endorsement of Forest Certification (PEFC), assure that all wood and wood-based products originate from sustainable sources.

Sustainability relating to car use , parking and road design

The Developer is required to formulate and supply to all Purchasers a Transport Plan in order to establish sustainable usage of vehicles.

BPC note that there is a considerable use of tandem parking where spaces are allocated within the curtilage of a house, and even, in some instances, within parking courts. Tandem parking is a parking arrangement where two cars are parked in-line and may need to be started and manoeuvred in order to arrive, park and depart. BPC question whether this is a sustainable arrangement, and would look for it to be altered to a side by side arrangement.



Housing Need

The use of tandem parking and remote communal areas of parking elsewhere in private drives and parking courts would suggest that the overall housing density is far too high.

It is understood that Strategic Housing within BDC have recommended a holding objection on the basis of the housing mix not being wholly suitable, or of meeting the wider needs of the Babergh community. This includes a recommendation that there are less of the larger (4+) houses and being required to concentrate more on housing for first time buyers, families and those wishing to downsize.

This strategy would indirectly support BPCs desire to see house specific allocation of car parking, avoiding communal parking areas, and sited within each buildings curtilage so as to support the needs of older people, and vulnerable or identified groups of people as reflected in local needs assessments. The use of remote car parking certainly does not address the needs of the elderly, disabled or the vulnerable.

Car Parking and Road Design

It is understood that SCC as Highways Authority have a holding refusal based upon the submitted road design, and BC would ask for the following to also be considered in any amended design.

BPC note the following apparent problems which have been identified-

- There are many houses which have no immediately connected parking spaces, these having to rely on communal parking areas. Each House should ideally be allocated at least one parking space. Where the current design fails to allow this, remote spaces must be allocated and identified within the freehold of each specific house so that Homeowners have ownership of an allocated space.
- There are many roads and drives which are private, i.e. not adoptable and which will be controlled by a private Management Company. Presumably home purchasers will be required to agree to such a contractual arrangement, and to ensure that this obligation is passed onwards upon a future resale? Such arrangements are not inherently sustainable in themselves, and gradual deterioration of the infrastructure is a likely outcome.
- BPC would request that all non-adoptable roads and infrastructure will be constructed to adoptable SCC standards, so as to minimise any gradual deterioration.
- The Application notes that Manningtree Station is only 1.5km distant. The Applicant should be required to ensure that casual on street parking is prevented on an ongoing and maintained basis, this being limited to short duration parking by delivery etc. vehicles.. Similarly, the design should disallow any casual parking on grassed and similar areas.
- Many of the private drives do not provide sufficient turning space for delivery and emergency vehicles to access and egress, all such drives must conform to SCC roadway requirements.
- Many of the private courts intended for parking have tandem arrangements which will require manoeuvring within the highway in order for car movement to take place.



Hopefully all of these situations will be identified and resolved by SCC Highways

Summary

The above sets out the obvious problems and unacceptable solutions inherent in this proposal. Some of the arrangements for emergency service delivery, commercial delivery and car parking are clearly inadequate for purpose. Many of the private drives and parking courts have no adequate turning heads.

These and other matters noted above all arise directly from the high density which the Applicant is attempting to achieve.

This belief appears to be supported by the holding objections current at the time of writing this report. (See summary below, with special regard to the Strategic Housing response))

It is the opinion of the Brantham Parish Council that the proposed density needs to be reduced, and sufficiently, in order to achieve a workable layout that demonstrates the sustainable elements required by the NPPF.

Statutory Responses on website.

- **Environment Agency** – raising a holding objection on flood risk grounds
- **Suffolk Highways** – have advised that there are a number of highways related issues for which further information and changes to the design to make the proposals acceptable. At the moment they are recommending holding refusal on this application.
- **NHS** – advise that the Manningtree Surgery is not able to absorb the increased requirements arising. They will not however object providing a suitable CIL contribution is made available to limit the impact
- **BDC Policy Strategy** – Recommends that the case officer is strongly recommended to ensure that full assessments of the proposals, harms, and benefits from a social, economic and environmental perspective are fully exhausted. Also to ensure all planning matters have been considered and appropriately weighted to ensure a sound recommendation is concluded.
- **BDC Strategic Housing** - advise as follows-

This scheme includes 2, 3, 4 and 5 bed market homes. It is recommended that there are less 4 and 5 beds and consideration be given to the inclusion of more 2 bedroomed homes particularly suitable for older people. It is extremely disappointing that there are no single story or 1.5 storey dwellings included in this proposal other than the associated garages. This broader mix will be suitable for first time buyers, families and older people wishing to downsize.

In view of the housing mix proposed for this site, Strategic Housing recommend a Holding Objection on the basis of the housing mix not meeting the wider needs of the Babergh Community who wish to and are able to have their housing needs met through the open market as set out in Core Strategy Policy CS18.

Policy CS18: Mix and Types of Dwellings

Residential development that provides for the needs of the District's population, particularly the needs of older people will be supported where such local needs exist, and at a scale appropriate to the size of the development. The mix, type and size of the



housing development will be expected to reflect established needs in the Babergh district (see also Policy CS15). Development on strategic housing sites or mixed-use developments with a substantial residential element will be required to make provision for the accommodation needs of vulnerable or identified groups of people, as reflected in established local needs assessments.

Section C - Comments on House Type and Character Proposals

General

The Application proposes the following Character Types:

Victorian/Edwardian

Rolling Valley Farmland

Industrial Edge

BPC considers that the proposed House Character types are a reasonably considered response, responding as they do to the more recognisably traditional buildings within Brantham.

BPC recognise however that the use of such standard types, especially in large numbers, can fail where:

- The end result is a clear pastiche, and not a subtle reference.
- The detailed treatment is incorrect, or incorrectly applied.
- Both of the above

Generally BPC would wish to see more subtle detailing of traditional features, with less use of contrasting colours in the use of quoin and arch detailing.

BPC would also wish for a blending of house character areas and types so that a blurring of boundaries between the three areas is achieved.

The use of slates should be avoided since these are not indigenous to East Anglia, being a Victorian import when Welsh natural slate was the cheapest form of roof covering. Clay materials should be used wherever possible, being a local and sustainable material.

Where slate is allowed, this should be Welsh slate, properly detailed, and not a composite material.

Design specific notes

These notes are included in order to record specifically where the proposed period details and elevation treatments are considered not entirely correct. It is felt that such details must be correct, especially within areas visible from the AONB.

Victorian/Edwardian

House Type NA41 and NA45 and variations

The main roof covering shall be the same material as that to the bay window. The size of the bay window would suggest the use of small units such as plain tiles.

The use of brick quoins and arched brick lintels is acceptable. It is not acceptable however to use stretcher bond to openings on the rear elevations, which must be at least a soldier course throughout.

House Type NB51, NT41, PT36 and PT37 and variations

The use of render is acceptable at first floor, but must not be allowed to be taken partially onto the side elevations. This is not a traditional detail on Edwardian/Victorian Houses, and certainly not in Brantham. The side render is unnecessary and visually detractive. The proposed dormers are visually too heavy in appearance.



It is not acceptable to use stretcher bond to openings on the rear and side elevations, which must in all situations be at least a soldier course.

House Type NA51 and Variations

The use of brick quoins and arched brick lintels is acceptable. It is not acceptable however to use stretcher bond to openings on the rear elevations, which must in all situations throughout be at least a soldier course.

House Type PA34 and PT44 and Variations

The use of render is acceptable at first floor, but must not be allowed to be taken partially onto the side elevations, as note above.

It is not acceptable to use stretcher bond to openings on the rear and side elevations, which must in all situations be at least a soldier course

House Type NB31, PA25 and Variations

The combination of brick quoins and arched lintel to the door should be avoided, as the junction between door quoins and lintel is not properly detailed or resolved. Similarly to the four windows to the side elevation.

The proposed dormers are visually too heavy in appearance

It is not acceptable to use stretcher bond to openings on the rear and side elevations, which must in all situations be at least a soldier course.

On all variations, the use of render is acceptable at first floor, but must not be allowed to be taken partially onto the side elevations, as note above.

Rolling Valley Farmland

All House Types

- All elevations visible from within the AONB shall be treated as “Front Elevations” i.e. they will finished as the front elevations used to define the Rolling Field Type.
- The various elevation treatments proposed will address the Palette of colours as suggested by the AONB Publication “Guidance on the selection and use of colour in development: Guidance”. The Dedham Vale AONB have already adopted such guidance and similar compliance will need to be ensured

Industrial Edge

House Type PT36 and NT41

Where applicable, it is not acceptable to use stretcher bond to openings on the rear and side elevations, which must in all situations be at least a soldier course

The rear elevations are generally plain brick which require to relieve by some form of detail (egg the use of blind windows) or other articulation. A blank wall is visually unacceptable, no matter what the reason.