

## **Langham Parish Council (LPC) Response to Planning Application 220595**

Outline Planning application for 30 new dwellings in School Road Langham

Consultation Expiry date: 19<sup>th</sup> April 2022

### **1. Background**

This application has come forward as part of the Local Planning Authority's (LPA) agreed housing allocation figures in the Colchester Borough Council's Emerging Local Plan (ELP). One of the key policies in the ELP is SS9 which relates to Langham. This has been included below for completeness and so that residents are fully aware of the Parish Council's position on this.

### **2. ELP Policy SS9: Langham**

In addition to the infrastructure and mitigation requirements identified in policy PP1 developers could be required to demonstrate the impact of their proposals on the strategic and local transport networks, including the cumulative impact of multiple developments (in line with national guidance). Development should not commence until adequate waste water and sewage treatment capacity is available to serve the new housing. Development on land shown in the Policies Map will be supported where they meet the requirements identified below for each site;

#### **Wick Road**

Development will be supported which provides:

(i) 10 new dwellings of a mix and type of housing to be compatible with surrounding development;

#### **School Road**

Development will be supported which provides:

(i) 70 new dwellings of a mix and type of housing for which there is a demonstrated need, including smaller family homes and sheltered housing;

(ii) One site to the east of the Powerplus site to accommodate 40 dwellings plus a car park for the school;

**(iii) One site to the west of the Powerplus site to accommodate 30 dwellings plus an extension to the adjacent recreation ground;**

(iv) A landscape Appraisal which will then inform appropriate design and suitable screening/landscaping to minimise any negative impact on the surrounding landscape, including visual screening around the School Road employment site and;

(v) A design and layout which protects and enhances the listed buildings including their setting including suitable screening/landscaping.

The Powerplus Engineering and Whitnell Contractors site on School Road, Langham Airfield (Lodge Lane) and The Depot, Old Ipswich Road, in Langham are designated Local Economic Areas as shown on the policies map. The sites will remain allocated, including an extension to Lodge Lane, and any future development proposals at this location will be required to accord with policy SG4.

### **3. The Parish Council Response**

There are a number of key areas identified in this response that will require addressing. This response should be regarded and recorded as an objection to this application until these matters are properly acknowledged and reviewed. This can of course be under reserved matters if appropriate.

#### **3.1 Capacity at the Langham Water Recycling Centre (WRC)**

The second site in School Road highlighted by SS9 is this planning application. The first site (191830) had planning conditions associated with it to ensure that sufficient capacity exists at the WRC before building should commence. This condition has still not been discharged

although the LPA have given approval for the partial discharge of this condition so that site work can commence but only 50% of homes can be built whilst the situation is closely monitored by Anglian Water (AW) and the Environment Agency (EA). This issue has been the subject of numerous meetings and email exchanges between the LPA and LPC and the current status of the suitability of the WRC to accept foul water flows on this scale is still disputed by LPC. This application makes the capacity issue a much bigger problem and **LPC believe that this should be a key item in Reserved Matters should the LPA have a mind to approve this outline application.**

### **3.2 Capacity in the Local Sewerage Network**

In addition to the capacity issues at the WRC there have been a number of issues reported by Langham residents over the last few years relating to the overflow of the AW foul water network in the local catchment area. This has resulted in raw sewage appearing in local gardens and on agricultural land. This situation is being monitored by AW who are monitoring flow characteristics in the local network at a number of points. Regular meetings have been agreed between AW, LPC and our member of Parliament Sir Bernard Jenkin to cover this matter and issues relating to the WRC. Again, **LPC believe that this should be another item in Reserved Matters should the LPA have a mind to approve this outline application.**

Given the information provided in paragraphs 3.1 and 3.2 it is extremely disappointing that on 1<sup>st</sup> April 2022 AW chose to issue a “boiler plate” response to the LPA regarding this application under the heading of Wastewater Services. This states that capacity exists at the WRC and in the sewerage network to accommodate this new site. This obviously does not convey the current position and the issue will be addressed directly with AW.

### **3.3 SuDs and the suitability of the local ditch network**

The surface water drainage from the site uses a permeable paving surface covering which absorbs the surface water which is then delivered to a pond/storage unit at the front eastern corner of the site. Water is then discharged to the ditch network at a calibrated rate. The Parish Council are of the opinion that the ditch network is not an appropriate means of dealing with site surface water flows.

In 2018 Ringway Jacobs, acting as a contractor for the Local Highways’ Authority, undertook a detailed investigation into flooding issues in School Road, in particular at the Langham Community Centre which is adjacent to this site. A Mole camera was put into the pipe network from the western side of the Langham Recreation Ground to the ditch network at the front of the site that features in this application. The plan was then to re-insert the mole camera at the eastern end of the ditch and then northwards to see if they could determine the drainage route to the Blackbrook using the ditch network. The drainage findings from Ringway Jacobs can be found using the following link:

<https://drive.google.com/file/d/1IK7fiCFNamMRjUoyhVME-fJ2c1YuDZjL/view?usp=sharing>

To summarise, there was significant root growth at a number of locations which made it impossible for the mole camera to see the extent of the flow problem but they were able to say with some certainty that the pipe network was broken up and in some places joints were completely displaced due to root growth. Consequently the ditch network was not flowing and drainage was not working correctly. They also said that the ditch network needed to be properly cleared out and regraded by the Landowner. A secondary route was used for water flows from the ditch adjacent to Whitnells trading estate to a soak away on the north side of School Road. This section appeared to be working but the ditch network was not flowing and water was being held up in the pipe network outside the Community Centre. No remedial work has been carried

out in the pipe network since the investigation and it is unclear whether this soakaway would be sufficient in a proper flowing network with increased water input.

The Parish Council are of the opinion that surface water drainage using the ditch network is not suitable until proper remedial work is carried out to ensure that the solution recommended in this outline planning is workable. This should also address the flooding problems adjacent to the site at the Community Centre. A proper functioning ditch network is essential before additional surface water drainage (SuDs) from this site can be considered. The Landowner/Developer should be instrumental in work carried out on the ditch network at the site.

### 3.4 Safety issues with an open ditch

Pedestrian footfall on School Road will significantly increase due to the two new sites on School Road. Up to 300 new residents including children will at some point have a need to use the footway along School Road which connects the village shop, Community Centre and pub to the two new sites. The Parish Council have tried a number of times to get the footway section at the front of this site to be repaired as it is in our view a safety issue due to major cracks and holes in the tarmac. The ditch network has also been the subject of criticism as it is an open ditch, however, it has been predominately free of water due to the flow issues already mentioned. The plan to drain surface water to a non-flowing ditch may well cause the ditch to fill and be a further danger point for an increased number of pedestrians.

Further thought needs to be given for a safe pedestrian route which should include footway replacement and safety fencing along the ditch or alternatively a fully piped and enclosed pipe network which would result in the ditch being filled in. **Any work on this site should be dependent on flooding and safety issues being addressed and should also be considered as Reserved Matters should the LPA have a mind to approve the outline planning permission.** Highways matters on drainage and flooding should also be addressed by the local Highways authority who were responsible for the original drainage investigation adjacent to the site.

### 3.5 Site Access Point

Recent communication with Langham residents has highlighted two points with regard to the proposed site entrance location:

- i) Potential safety issues with the line of sight in School Road for vehicles leaving the site. Particularly relevant looking in a westerly direction when leaving the site as there is a bend in the road which limits the distance where oncoming traffic can be observed.
- ii) When leaving the site after dusk vehicles headlights could be shining directly on the premises opposite the site, which is causing some concern to residents who live in these properties. Both of these issues could be addressed by moving the site entrance slightly further west but it is unclear what the impact on the developer might be in terms of site layout and compliance with regulations. Once again, **if the LPA have a mind to approve this application we would like the final site layout to be reviewed under Reserved Matters to investigate these two points.**

### 3.6 Transport Statement

Intermodal Transport Ltd (ITL) have been appointed by the developer and have provided a Transport Statement which includes trip rates for traffic associated with this site based on TRIC figures. TRICS seems to be a software database which is (as stated by ITL) "the industry standard trip rate software" and seems to be based on traffic behaviour around the UK.

It would seem that no traffic measurement has been carried out on the existing traffic levels in School Road, which relate to this application, and how two new sites in School Road would impact the future traffic levels. Although the LPA treats all planning applications independently this surely cannot be applied when you have two large developments adjacent to each other

(Planning Apps: 191830 and 220595). There could be around 200 more vehicles in School Road as a result of these two developments and a broad statement as shown in paragraph 7.6 of the ITL document conclusions is extremely questionable and is not supported by combined figures. The statement says “the weekly peak hour traffic is not expected to have a significant effect on the operation of the local road network”. That might be true if there were only one new development but even that is questionable. **Again we feel that this another potential Reserved Matter if the LPA have a mind to approve this outline planning application.**

We should also point out that paragraph 4.6 (table 2) of the ITL document which lists the available Bus services in Langham is incorrect. There is no 93 or 93A bus service from Ipswich to Colchester that has a stop in Langham.

### **3.7 Overhead Power Cables**

On the site masterplan there is a statement to relocate power cables underground which is an essential requirement. The Parish Council would like to ensure that this also applies to the existing section of overhead cable that spans the area of land referred to in the ELP SS9 as the Recreation Ground extension adjoining the west end of the site.