

# Consultee Comments for Planning Application DC/22/00754

## Application Summary

Application Number: DC/22/00754

Address: Former Chambers Bus Depot Church Square Bures St Mary Suffolk CO8 5AB

Proposal: Planning Application - Construction of local convenience store and 10 no. apartments/houses (a net increase of 9 dwellings) including associated drainage, parking, hardstanding, fences/walls and other infrastructure (following demolition of outbuildings and in-filling of former vehicle inspection pits, partial demolition of former bus depot and house)

Case Officer: Owen Fayers

## Consultee Details

Name: Mrs Jenny Wright

Address: 38 The Paddocks, Bures CO8 5DF

Email: Not Available

On Behalf Of: Bures St Mary Parish Council

## Comments

Following the Bures St Mary Parish Council Extraordinary meeting held on 29th June 2022, the Parish Council maintains its position and strongly objects to this application on highway safety grounds (NPPF Section 111).

As noted in the Ardent response to the HTTC Highways Report( Report Ref:2104720) item 2.9, there had been no objections at all from SCC Highways to the initial proposed revision of the junction layout at Church Square with Bridge Street on the B1508. The developers and SCC Highways had previously been adamant that the proposal would not represent a severe impact upon the highways network. It was only the submission of an independent report compiled by Mr Keith Anthony Berriman I. Eng., FIHE FCIHT of The Highways Traffic and Transport Consultancy that prompted any further scrutiny of the proposed junction layout and resulted in this Reconsultation. It is particularly concerning that it required private funding by members of the local community to produce substantiated evidence to secure this additional examination of the junction layout.

Consequently, the Parish Council remains concerned that the developers have still not considered all possible options to ensure the safest design for all road users as required where developers must create places that are safe, secure and attractive which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards(112c. NPPF 2020). Even the submitted Road Safety Audit Stage 1 in the M&S Traffic report commissioned by Ardent contains covering emails where the reliability and efficacy of the TRL modelling software is brought into serious doubt. One email clearly states that the empirical model used by the PICARDY module cannot be turned readily to model unusual

junctions like this one and goes on to suggest uncertain possible ways to overcome this whilst hoping that it is good enough.

The Parish Council certainly does not regard the repositioning of the eastbound bus stop as good enough and questions why it has been located so close to the bend leading into the High Street. It would also seem imminently sensible to negotiate a change to the current practice by public transport providers of stopping for prolonged periods at both the eastbound and westbound bus stops for driver breaks and timetable adjustments. The bus stops at Normandie Way on the B1508 in Bures Hamlet, if used for this purpose, would greatly reduce the congestion and queuing traffic which consequently occur in Bridge Street.

The Road Safety Audit emails do not inspire confidence and the Parish Council would ask if the possibility of a mini-roundabout could be considered as an alternative layout to overcome the potential hazards which may arise at this junction in the future.

That said, the Parish Council recognises that some of the proposed revisions within the development site, namely to the loading bay area, the repositioning of the pedestrian crossing on the site access road, the safety barrier and pedestrian deterrent paving on the northern side of the access to the site and a segregated pedestrian route provided for those travelling to and from the store on foot, are all significant improvements.

However, Ardent acknowledges in their response (item 2.40) that retail car parks, especially those for convenience stores, tend to have a rapid turnover but also conversely claims elsewhere that the development would not be a vehicle-dominated environment (2.7). The anticipated substantial vehicular movement in and out of the site seven days a week is inevitably going to result in loss of amenity to a significant number of households in Bridge Street, the High Street, Church Square, Friends Field and, of course, the nine new dwellings proposed on the site itself.

The Parish Council has noted the Conditions applied to this application by SCC Highways requiring the submission of a Construction Management Plan which will specify in particular g) site working and delivery times and a Deliveries Management Plan which will determine all HGV delivery traffic movements to and from the site once the development has been completed.

To minimise the disruption to the lives of families living nearby caused by vehicle movements, audible reversing alarms and car doors being shut throughout the day and evening the Parish Council would want to see the opening times of the convenience store restricted to be no later than 9pm. The Parish Council also notes that the Senior Environmental Protection Officer for BMSDC also requires an acoustic assessment relating to air source heat pump plant associated with the proposed development to minimise detriment to nearby residential amenity as well as a Construction Management Plan. However, any later opening of the proposed convenience store would fail to address the requirement as set out in the Policy LP26 Design and Residential Amenity of the Babergh & Mid Suffolk Joint Local Plan 2020, i.e., that development proposals shall:

2i. Protect the health and amenity of occupiers and surrounding uses by avoiding development that is overlooking, overbearing, results in a loss of daylight, and/or unacceptable levels of light pollution, noise, vibration, odour, emissions and dust; Including any other amenity issues.

The Parish Council believes it is of even greater significance to establish opening hours for the long-term which will adequately protect the interests of nearby residents once the convenience store is operational.

Local anecdotal evidence has shown regular deliveries to other (and smaller) convenience stores involving large articulated lorries. The Parish Council would expect to see a stipulated condition that clearly and enforceably only allows rigid delivery vehicles of no more than 10m on site as suggested in items 2.15 and 2.39 of the Ardent response report.

Whilst SCC Highways are not in a position to object to the short fall from the advisory guidance figures for destination parking, the Parish Council finds the unreliable estimation of alternative parking provision in the village totally unacceptable. In item 2.51 the Ardent response incorrectly states that there is a public pay and display car park with over 40 spaces located on Nayland Road. This car park, owned by the Sportsground Committee, provides free unlimited parking for the primary school staff, visitors and parents (in the absence of any parking at all of its own) , the Community Centre, the visitors to the recreation field and the river, the church ( also without parking provision of its own) and for nearby residents who have no private parking provision either. This car park is well-used, frequently to capacity, and regularly by long-stay vehicles but in no way can justifiably be used as an argument to off-set the proposed loss of parking in Church Square and Bridge Street or the under-provision of retail parking on the development site. The Parish Council finds this manipulation of the everyday situation on the ground disingenuous in the extreme.

The loss of on-street parking primarily to accommodate the proposed development is an affront to the community's sense of fairness. There has been no attempt whatsoever to compensate the village for the added negative impact on demand for parking spaces that this will cause.

The loss of on-street parking will greatly inconvenience patients attending the doctors surgery and its staff and the Post Office customers , none of which seem to have been given any consideration in this reconsultation. To only provide three visitor spaces on site for the nine proposed dwellings, although compiling with planning recommendations, simply adds insult to injury. Add all of this under-provision to reduced destination parking for the retail outlet and it is the local residents who will be inconvenienced and subjected to congestion as well as the inevitable increased traffic movement on a daily basis, thereby significantly reducing the quality of village life, well-beyond the degree of compromise required (item 2.1) if this disused brownfield site is to be redeveloped. The Parish Council suggests that there should be nothing less than some guaranteed free, unlimited parking provision on site to redress the balance.

The Road Safety Audit Stage 1 advises the installation of non-passive bollards either side of the tactile pavement provision and retro-reflective strips are to be provided on the bollards. (3.4.1).

Members wish to prevent any further urbanisation of our Conservation Area and to preserve the character of the immediate neighbourhood. To this end, the Parish Council would recommend the installation of heritage-style bollards and, to minimise any undesirable visual impact on the surrounding area, that there should also be a condition determining the need for discrete and sympathetic signage on the proposed convenience store in line with the NPPF (2021) requirement:

136. The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

The Parish Council is disappointed that no reference has been made in the revised documents to our previous comment stating our preference for smaller dwellings for starter homes or downsizing homeowners as identified in the March 2022 Initial Housing Needs Survey carried out by the Rural Community Council of Essex (RCCE) as part of the Neighbourhood Planning Process.

The Parish Council recognises that the flats and apartments will enable the integration of older persons into the community in order to address potential issues of isolation and to promote inclusivity (LP06-13.34 ). We, therefore, support the residential proposal for Zone 2 in principle. The Parish Council maintains, however, that the smaller properties, as previously suggested, would enable young families to remain in the village , thereby enhancing and maintaining the vitality of this rural community (LP01- 13.02). Baberghs Adopted Core Strategy 2014 to which Roses refer in their Planning Statement clearly states: New housing will be supported where needed and the mix, type and size should reflect the needs of the district. Mix and Type of dwellings CS18.

The population of the two villages as of the 2011 Census shows residents of 65 years of age and over to be 26.6% of the local population as opposed to the national average in England which is 18.5% (page 8). The final version of the Housing Needs Survey prepared by Neil Harper of the Rural Community Council of Essex (attached) demonstrates that 59% of respondents voted 2-bedroomed homes as the most preferred property size (page 10)and no need at all was identified for homes larger than 3-bedroomed properties. One of the key findings of the report (page 9)was the general support for housing in the local community, more particularly for the younger generation and for families. However, the three four-bedroomed properties proposed for this development seem wholly inappropriate in meeting the clearly identified needs of the village. It is concerning that locally-sourced verifiable evidence as presented in the RCCE report appears to be of no consequence.

The Parish Council hopes and trusts that these justifiable concerns will be given due

consideration.

Mrs J Wright

Clerk to Bures St Mary Parish Council