

Planning Application 19/01025/FUL

I have two major concerns with this application.

NOISE

The noise impact assessment accompanying this application focuses on the impact of noise on the new homes in the development rather than the affect of “bounce back noise” of trains passing through Kelvedon station from the proposed flats.

The report acknowledges there will be an increase in noise but says it won't be “significant” - a subjective term. This conclusion was based on modelling but objectors have told me that they have not been approached to test the modelling from their properties.

Residents in Kelvedon need assurance that “bounce back noise” won't be a problem. Please can you include conditions for measures to be implemented to mitigate “bounce back noise” such as screening by the way of tree planting as was shown on the original plans prior to Outline permission being granted.

FLOODING

On Friday I sent members of this committee photographs of the River Blackwater bursting its banks on Saturday 5th December this year after less than an inch of snow fell the day before and quickly melted after a period of overnight rain.

This was to show you that it doesn't take much in the way of precipitation and the resulting run-off to cause the river to burst its banks in this locality.

(As you are probably aware the River Blackwater is a managed river used by the Environment Agency to transfer water from The Ouse to the Abberton Reservoir because Essex has a water deficit in relation to its population.)

Historically Kelvedon was built in a natural bowl that followed the bend of the river. So far this century there have been three major flooding events in Kelvedon and Feering in October 2001, May 2012 and February 2014 when residential properties and businesses were flooded.

(The highest point of the development site is the top south west corner and it generally falls away down to the north east corner - the section of the site closest to the River Blackwater, approx 60metres away.)

At the moment rainwater run-off flowing from this development site passes along a drainage ditch at the rear of the gardens of homes in Coggeshall Road and then via a drainage pipe into the River Blackwater. Once this 10 hectare field becomes a housing estate with the roofs of 238 homes and roads, paths and parking areas, logic suggests rainwater run-off will increase.

The report by Peter Richardson, the Development and Flood Risk officer for Essex County Council, dated December 3 this month, says a detailed surface water drainage scheme for the site needs to be submitted to and approved by the Local Planning Authority (BDC), and this needs to show it will prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site and to ensure the effective operation of the SUDs features over the lifetime of the development.

Mr Richardson said “failure to provide this information before commencement of works may result in a system being installed that is NOT sufficient to deal with surface water occurring during rainfall events and may lead to increased flood risk”.

He added that prior to deciding this application, it may be necessary for BDC to consult relevant experts outside BDC's planning team to carry out a “Sequential Test in relation to fluvial flood risk” because it is outside his remit.

A flood assessment by Cala's own consulting engineers, Conisbee, focuses mainly on the affect of rainfall on the development and not the development's impact on the river in regards to run-off.

The submitted plans show a single SUDs basin to the east of the access road, as opposed to two which were shown on the outline application's Parameters Plan. The omission of the second detention basin results in a greater reliance on underground storage capacity where site surface water can be stored and then discharged into the river system.

The surface water attenuation basin in these new plans is much smaller than on the previous application and this increases the danger of flooding. Therefore I suggest the second detention basin should be reinstated and if more Open Space is required the amount of housing should be reduced.

This committee should not rely on Cala to mark their own homework on this matter and as Mr Richardson advises in his December 3 report, officers should instruct independent third party experts to carry out a flood risk assessment on behalf of BDC.

OTHER CONCERNS

Finally - there are still 8 homes in the plans that lack adequate garden space. The officer's report admits there are areas where the site doesn't meet the Essex Design Guide Standards. And the Habitats Regulations Assessment has not yet been approved by Natural England.

Thank you, Cllr Paul Thorogood