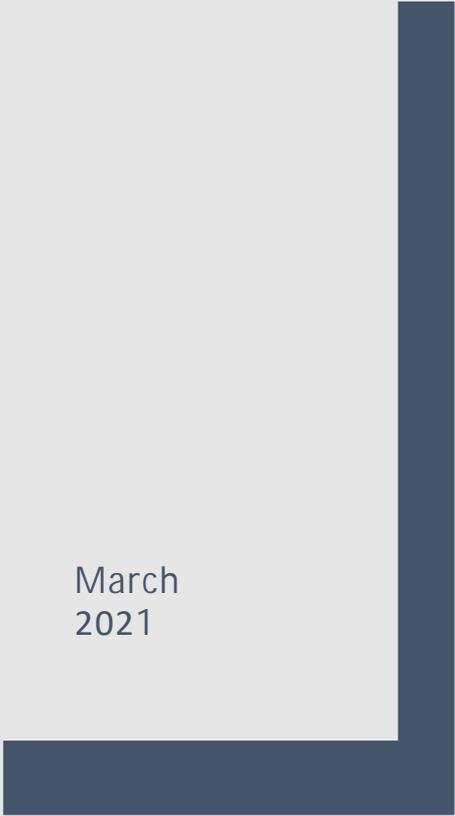




DC/20/3284/FUL & DC/20/3362/FUL, Chapel Field,
Land to the West of Chapel Road, Grundisburgh

GRUNDISBURGH & CULPHO PARISH COUNCIL'S RESPONSE

March
2021



Grundisburgh & Culpho Parish Council

The community and Parish Council of Grundisburgh & Culpho have been fighting a proposal to build 70 dwellings on Chapel Field, on the edge of the village for over 2 years, since it was first included in Suffolk Coastal's Final Draft Local Plan.

In September 2020 Hopkins Homes submitted two duplicate planning applications to build 80 dwellings on the site. East Suffolk Council received 351 objections to the proposal in autumn 2020; all highlighted the inadequate and insurmountable access problems along the narrow country lanes around the field.

Hopkins Homes have now submitted a revised layout for 70 dwellings, but the access is, as it was, Park Road/Lower Road, narrow country lanes with no footways, which are currently in the process of being designated "Quiet Lanes" by Suffolk County Council.

On December 16th 2020 a Housing Update Statement was made by the Rt Hon Robert Jenrick, Secretary of State for the Ministry of Housing, Communities and Local Government. This is an extract:

"There is widespread support for ensuring enough homes are built across England to ensure the needs of our communities are met. We heard clearly through the consultation that the building of these homes should not come at the expense of harming our precious green spaces."

Chapel Field is one such green space, agricultural land, on the edge of our village better related to the countryside than it is to the built-up area of our historic settlement. Safe pedestrian links from Chapel Field to the centre of the village can not be provided. Conflict between pedestrians, cyclists, equestrians and those in cars, emergency vehicles, and delivery vehicles, can not be avoided on the narrow access roads to Chapel Field.

This 5 minute film, produced by local company Summer Isle Films, gives a taste of just how strongly the community feel about this issue:

<https://f.io/Yq8v-Fuf>

The Parish Council request that the ESC planning committee view the film and visit the site before a decision is made on these applications.

Documents & material included re: Planning Applications DC/20/3284/FUL & DC/20/3362/FUL Revised Plans.

- Grundisburgh & Culpho Parish Council Representation March 2021.
- Review of Revised Access Proposals March 2021. (Alistair Turk)
- Link to Chapel Field – the video

Previous documents included:

- Response to DC/20/3284/FUL & DC/20/3362/FUL September 2020 Land to the West of Chapel Road
- Transport Assessment
- Landscape & Visual Impact Assessment

Peter Kendall
Chair
Grundisburgh & Culpho Parish Council

Ann Willetts
Vice Chair

March 2021

**Re: Planning Applications DC/20/3284/FUL & DC/20/3362/FUL
Grundisburgh & Culpho Parish Council Representation
March 2021**

1. Introduction

1.1. After reviewing the revised planning applications, Grundisburgh & Culpho Parish Council remain convinced that the Chapel Field site cannot be delivered without setting many dangerous new precedents and reversing the great strides made over multiple decades to ensure new residential development is in the right locations, at the right scale and with the right design elements to create great new places to live. As such, we remain firmly opposed to the proposals on many grounds which we have either detailed in previous representations (which still stand) or in the following document.

2. Public Interest

2.1. The volume and tone of responses at every stage of this process continue to make it clear how the public feel about the location and substance of this development and we hope that finally their concerns will be addressed properly; although this may be naive of us judging by how readily East Suffolk District Council have dismissed our concerns about the back-room dealings between them and the developers that have seen us to this point. From our many interactions with residents of Grundisburgh we can tell you that many people are very angry about this situation, and there is serious doubt about the integrity and intentions of East Suffolk District Council. We on the Parish Council however, believe there is an opportunity now, with the huge number of issues still apparent with this proposal, that ESDC can restore the public's trust in them and the planning process by firmly applying the many long-established planning principles available to them and deciding on refusal.

2.2. As in all previous 'rounds' of this saga the site proposer has presented a number of 'expert' testimonies that once again purport to show how inconsequential the concerns of Grundisburgh residents are. Of particular note is the frequency the adverse impacts associated with the proposal are described as 'acceptable' or 'negligible' by these 'experts' who live many miles away and have maybe only visited the site once or twice (perhaps never); impacts such as loss of agricultural land, habitat loss and removal of wildlife corridors, dangerously narrow access roads, unacceptably high road speeds, accident frequencies, regressive site layouts and access arrangements, convoluted and unacceptably long pedestrian access routes, altogether missing footways, footways to nowhere, requirements for construction on third party land, invasion of veteran tree root protection areas, outright removal of smaller trees and hedgerows (some on supposedly protected land), infringing on heritage asset boundaries and outlooks, all whilst completely ignoring the challenging topography of the site.

2.3. The rush to endorse this proposal from all of those 'experts' runs completely counter to the history of the site and its surrounding area; indeed as Appendix A of this document shows the Council themselves have staunchly objected to every suggestion of developing the site from at least 1964 until late 2018; with their arguments then and throughout almost matching our own word for word. It was simple common sense to refuse applications then, as it should be now, but with the added backing of countless planning policies and guidelines that this proposal still fails to accord with.

2.4. To illustrate this point, here is an excerpt from planning refusal E/8779 from 1964 [Proposed residential development **opposite the Baptist Chapel**, Grundisburgh]:

"The development would appear as an intrusion on to open land away from the main part of the village. There are also road safety objections in that the roads adjoining and near the site are narrow, the junctions are unsatisfactory and the levels of the land give rise to additional difficulties."

- Area Planning Sub-Committee, on behalf of Suffolk County Council

- 2.5. As such, we would urge reviewing members of East Suffolk District Council to put aside those paid-for opinions put forward by the site proposer and listen more closely to the views and accounts of those who know the area, and also trust in the judgement of their predecessors who knew that a site like Chapel Field should never be considered for a large-scale development.

3. Highway Access and Safety

- 3.1. The revised planning application needs to be once more assessed against the Development Plan and any other material considerations and there is a planning policy in place that is backed by the Government's Planning Inspector that stated 'The Policy should be amended to make clear that the provision of safe and suitable pedestrian access to services and facilities in the village is required so as to be consistent with national policy'.
- 3.2. We continue to be disappointed with the contribution from SCC Highways in their repeatedly failing to set an appropriately high bar in terms of site access and highway safety provisions. It is our hope that, in the event of Highways' continued failure to address the obvious shortcomings of this proposal, that reviewing members of the District Council have the courage to exercise their own discretion on the matter of highway safety and the appropriateness of the proposed access arrangements.
- 3.3. When considering the term 'severe' the NPPF considers highway safety and residual cumulative impact and explains in the subsequent paragraph what this means in practice. Crucially developments should give priority:
- to pedestrian and cycle movements, both within the scheme and with neighbouring areas;
 - and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
 - address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
 - 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;
 - allow for the efficient delivery of goods, and access by service and emergency vehicles.
- 3.4. We consider that the 'cumulative impact' of this proposal goes well beyond 'severe' as the *present* highway conditions on all of the site's surrounding lanes require very careful navigation for those on foot, cycle and horseback and the significant increase in vehicular traffic that this development would bring will drastically increase the risk of an unwelcome 'coming together'. The fact that there have already been two recorded accidents involving injuries on the very stretches of road concerned remains a very clear warning about the hazards already present, without ESDC allowing them to get even worse.
- 3.5. The revised application still fails to address the current or resulting highway conditions along Lower Road and Park Road (routes currently in the process of being designated 'Quiet Lanes'), other than to quote some rather meaningless vehicle movement volumes - after all, it only takes one misjudgement to kill a pedestrian in such confined road spaces.
- 3.6. Although some highway improvements are proposed along Park Road, these still fail to provide any safety provisions for pedestrians in the form of footways, level verges or other refuges. Moreover, widening Park Road for the sole purpose of allowing two-way vehicle flow will likely increase road speeds, thereby increasing the risk of serious injury for pedestrians sharing the road surface with vehicles. This limited highway improvement falls well short of the high standards embodied in modern planning policies, as it places motor vehicle flow above pedestrian safety. That said, we are pleased that it has finally been admitted that the road widening will stray beyond the highway boundary onto

Grundisburgh Hall Park - a point we have been making for some time in sharp contrast to the technical drawings submitted to date by the site proposer.

- 3.7.** As in previous iterations, Lower Road remains almost entirely overlooked, save for the acknowledgment that over 40% of the site's new traffic flows will go that way and that improvements are needed at the junction with the B1079 to make it safer. We fail to understand how the site proposer, their 'experts' and Highways cannot see the glaring inconsistency in the proposal; providing 5.5m wide roadways *on* the development site (with full footway provision) yet happy to use a sub-3m wide, residential lane for main access along with its blind corners and missing footways.
- 3.8.** To help us understand the objective measures used to qualify this assessment can someone either from Highways or ESDC please explain the conditions under which the surrounding lanes (particularly Lower Road) would become an issue preventing development, if not now? What number of homes would be the tipping point, and why? Surely such a judgement should be based on clear and objective criteria so we would warmly welcome anyone to explain this to us and the public - particularly the residents of Meeting Lane, Chapel Road, Lower Road and Park Road who did not 'sign up' to living on main access roads to a significant development and who will still not, according to this latest proposal, get new footways to offset the increased risks for foot journeys to the village centre. The Parish Council consider that Highways' continuing to ignore these very reasonable questions very concerning, and humbly appeal to reviewing members of ESDC to push this line of questioning until satisfactory answers are obtained.
- 3.9. Planning refusal C8815 [Use of land for the erection of **one** dwelling, **Lower Rd** Grundisburgh] 1986:

"The proposal is not in the interests of highway safety, being approached along a fairly narrow road, close to a completely blind double bend and without footways or level verges."

- Director of Planning Services, District Council

- 3.10.** The roads that pedestrians, cyclists and those with mobility difficulties will use to access the village facilities are Chapel Road and Meeting Lane (the so-called 'desire line'), no matter the improvements to footpaths on/around the site because of the significant additional distances involved in using them. As with Lower Road and Park Road, there is currently a proposal to designate these roads as 'Quiet Lanes' due to their narrowness and lack of footways. That designation in itself will not make the roads safe, especially in the event of increased traffic volumes and speeds. The residential development site is therefore wholly incompatible with the 'Quiet Lane' designations it is surrounded by.
- 3.11.** Planning refusal C6126 [Residential development on **land off Meeting Lane**] 1981:
- "The proposal is premature pending the improvement of Meeting Lane, which is a narrow unclassified road which in its present form does not represent a satisfactory means of access for additional development."*
- District Planning Officer, District Council

4. Pedestrian Access to Village Services

- 4.1.** There remains a reliance on improvements to Footpath 20 but many of these improvements are outside the site area and we understand notice has not yet been served on the land trustee. Hedgerow 5 is proposed to be removed to facilitate a pedestrian access yet this hedge does not form part of the existing highway that is maintainable at public expense. Paragraph 13 of the Development Management Procedure Order 2015 is backed by Section 65 (5) of the 1990 Town and Country Planning Act. The Local Planning Authority should not therefore entertain these applications until the Notices have been properly served and a consultation process has been conducted - in line with present PROW change policy.

- 4.2. We also understand that a grampian condition could equally not be used to secure the highway improvements on land that is outside the control of the applicant or highway authority. The landowner has not agreed to these proposals and our understanding is that, to date, they have rejected the proposal outright. As a result of the judgement in *Merritt v SSETR* and *Mendip District Council* it is not possible to impose such a condition when there are no prospects at all of the action in question being performed within the time-limit imposed by the permission.
- 4.3. Since several smaller sections of the footpath that lie on third party land are officially designated as below 1.5m wide in FP20's definitive statement, we are also interested to understand what statutory powers are being used to secure the additional land to achieve 1.5m width between the site and both Ipswich Road and Post Mill Orchard as described in the site proposer's Transport Assessment? It is noteworthy that the site proposer is only suggesting 'Footpath 20 to be resurfaced to a width of 1.5m *where possible*' - this does not align with Highways commitment to 1.5m *throughout*.
- 4.4. With regards to the design and construction of the proposed footpaths, we are grateful for the new information provided by the site proposer but now have serious reservations about the use of 'above-ground' construction for paths passing through veteran tree root protection areas; particularly those on third-party land as detailed in the Arboricultural Assessment. Typically these constructions require significant topsoil backfill along either side to even off the 'step' created by the raised footpath. In this instance it is doubtful the third party would allow such encroachment onto their land and as SCCs statutory powers do not extend beyond the physical limits of the PROW we do not see how this will be a viable proposition if we are to achieve the necessary 1.5m widths throughout.
- 4.5. Putting matters of statutory powers aside, we also wish to question the basis for Highways' direction that 1.5m wide footpaths are sufficient. During our own 'Review of Access Proposals' (attached) we determined that the Suffolk Design Guide stipulates that pedestrian routes should not only have a minimum track width of 1.8m (to allow pushchairs, wheelchairs etc to pass each other easily), but there are strict limits in relation to gradient and forward visibility - both of which are in doubt with this proposed route. Our expectation as a Parish Council is that all new pedestrian links in our village are of a high quality, are accessible to all users irrespective of their physical capability and take an appropriate route - standards which this proposal still fails to achieve any of.
- 4.6. Quite simply the proposal still does not provide a deliverable, safe or suitable access to services and facilities in the village and it is therefore contrary to both the Local Plan and National Policy. Moreover, the consultation response from the Highway Authority dated 5th March 2021 notes the inadequacies of the footways closest to the site. This demonstrates that the mitigating proposals submitted in support of the Appropriate Assessment also fail and the application must therefore be refused.

5. Ecology

- 5.1. The proposal is contrary to the Habitat Regulations and Circular 06/05. Appropriate species surveys have not been undertaken and the phase one habitat survey was undertaken in November 2019. Appropriate surveys could have been undertaken during 2020.
- 5.2. The Ecological Appraisal is inconsistent with the Arboricultural Assessment. Paragraph 3.31 of the Ecological Appraisal states that there are no veteran trees adjacent to the site but the Arboricultural Assessment recognises that the Root Protection Area of at least one veteran tree (and a number of smaller trees) will be affected by the highway works in Park Road.
- 5.3. Paragraph 4.5.7 of the Ecological Appraisal states that all hedgerows will be retained as part of the scheme but the proposal is to remove Hedgerow 5 altogether, and although it is not detailed in the Arboricultural Assessment, significant stretches of hedgerow along the southern edge of Park Road

will also need to be removed outright or will suffer fatal loss of root systems during excavation works to widen the road.

- 5.4. The Ecological Appraisal and planning application form recognise that protected species will be affected but there have been no appropriate surveys undertaken. Unbelievably the Ecological Appraisal relies on the fact that there has been no survey undertaken for dormice on the site to justify the point that dormice have yet to be identified. An absence of evidence is of course not evidence of absence.
- 5.5. The Ecological Appraisal accepts that bats use the site but it does not identify the species, the numbers or the routes that they take.
- 5.6. The Arboricultural Assessment recognises that planning conditions will need to be imposed on land that is outside the site to limit the damage to trees from the highway works, but provides no guarantees that such works could be conducted without considerable, potentially fatal, impact to a great number of otherwise healthy trees and hedgerows along Park Road. The Parish Council tree warden considers that the root protection areas of 2 veteran, 6 category A, 17 category B and 13 category C trees as shown in the arboricultural impact assessment (AIA) would be encroached upon, and in turn cause substantial damage to these trees.
- 5.7. In the unthinkable event of this application being approved in its current state, we wonder what protection the promised presence of an arboricultural expert during excavation will provide, since it is certain that extensive root systems will be encountered for a great number of trees due to their abutting the current highway boundary. Are we expected to believe that excavation will be halted or that mitigation measures are possible at such proximity to the trees' trunks? The Local Planning Authority would need to be assured that they have the means to enforce such a condition before contemplating any kind of approval. Indeed, what is a 'root protection area' if not an area that is supposed to be protected from *any* and *all* excavation?
- 5.8. The proposal fails the Appropriate Assessment test. Any measures used to inform the decision about the effects on the integrity need to be sufficiently secured and likely to work in practice. The Appropriate Assessment is defective in this regard as it relies on proposed walking routes that are not safe. The roads are unlit and lack footways or verges that can easily be accessed.

6. Impact on Heritage Assets

- 6.1. An observation about the highway improvements to Park Road and the corresponding impacts to trees and hedgerows detailed in the Arboricultural Assessment is that they ignore one very important factor - and that is the protected status of the setting of Grundisburgh Hall Park - both in Local Plan policy and further in the Planning Inspectors' report. The road widening needed is up to 900mm in places and clearly extends beyond the current highway boundary into the park grounds. Whilst the land owner is entirely comfortable about this encroachment, we would ask just what is the point of policy SCLP 11.8 'Parks and Gardens of Historic or Landscape Interest', if not to protect such heritage assets for the benefit of future generations from the impulses of their current owners?
- 6.2. With such a protected status, we would expect that the standards to be applied to any proposed changes would be increased *significantly* such that any movement of boundaries, loss of/impact to trees and hedgerows (even those with a lower arboricultural value in grading terms) would be have to be demonstrated *overwhelmingly* in the public interest and not merely satisfy the land owner's private interests.
- 6.3. We believe that the failure of Aspect Consulting to respect policy SCLP 11.8 and the heritage value of Grundisburgh Hall Park reflects accurately the site proposer's overall attitude to the locale - instead

of aiming to add real value and enhance the area they are simply aiming to deliver to the lowest standard they are required to in order to maximise profits. The Parish Council asks that the reviewing members consider this proposal with the highest of standards in mind and not allow for *any* potential adverse impact to our historic landscape, in line with the Planning Inspector's clear wishes as detailed in his final report.

7. Design Aspects/Quality of Submission

- 7.1. The revised plans look rushed. There are no strip elevations or proposed floor levels shown and it would not be possible to safely assess the proposals in its context without this information. The Flood Risk Assessment indicates that there is an 8 metre drop over the field but there is no datum point shown or proposed and existing levels shown on the plans. Without this information the Local Planning Authority will not be able to assess the application and the local residents are not being properly informed about the proposal.
- 7.2. Vehicle access to the site from Chapel Road/Meeting Lane was deemed unfeasible by the Planning Inspector due to its narrow width, lack of footways and the inability for it to be suitably widened. In spite of this the developer is proposing that 2 large properties, plots 53 & 54, are directly accessed from Chapel Road which would appear to be in contradiction to the Planning Inspector's findings.
- 7.3. The environment of the proposed new development is dominated by car parking. Plots 6,7,8,47 and 48 have no front garden just 2 parking spaces each directly fronting the dwelling. With this level of parking provision, site proposer is acknowledging that this location would have a heavy reliance on car transport which greatly undermines their claims of sustainability.
- 7.4. Chapel Field is a green field site on the periphery of Grundisburgh and the proposed development does not relate well to the landscape or the scattered nature of the dwellings in that area. It also fails in every way to respect the local vernacular and characteristic features of historic Grundisburgh. It would always emphasise the differences between old and new, never fitting into its setting.
- 7.5. The Planning Application form also still refers to 80 dwellings, the keys to a number of the plans have not all been updated and we can find no record that the revised plans have been screened for EIA purposes. The addendum to the Transport Assessment has not been proof read and the conflicts between the Ecological Appraisal and Arboricultural Assessment demonstrate a lack of oversight and care. The Heads of Terms have not been updated; the local community would like to be consulted on a complete application that contains up-to-date and accurate information.

8. Summary

- 8.1. In their latest supporting letter, the site proposer have asked for this application to be presented at the next planning committee and a decision reached quickly. We agree - but for the sake of Grundisburgh residents who have to keep taking time to review the submissions, respond and then suffer excruciating waits as the multitude of issues are debated and investigated.
- 8.2. When all of the above factors are considered, alongside those made previously by the hundreds of respondents, we believe there can be no doubt left to anyone that this remains a very poor quality proposal for a site that, judging from the number, scale and breadth of the issues still being raised, should never, realistically, have been allocated in the local plan.
- 8.3. Accordingly, Grundisburgh & Culpho Parish Council firmly object to this revised application.

Appendix A

Historical comments from District & County Council regarding proposed development on the Chapel Field Site, its immediate surroundings or main access roads:

1. Planning refusal E/8779 [Proposed residential development **opposite the Baptist Chapel**, Grundisburgh] **1964**:
"The development would appear as an intrusion on to open land away from the main part of the village. There are also road safety objections in that the roads adjoining and near the site are narrow, the junctions are unsatisfactory and the levels of the land give rise to additional difficulties."
- Area Planning Sub-Committee, on behalf of County Council
2. Planning refusal C6126 [Residential development on **land off Meeting Lane**] **1981**:
"The proposal is premature pending the improvement of Meeting Lane, which is a narrow unclassified road which in its present form does not represent a satisfactory means of access for additional development."
- District Planning Officer, District Council
3. Planning refusal C8815 [Use of land for the erection of **one dwelling, Lower Rd** Grundisburgh] **1986**:
"The proposal is not in the interests of highway safety, being approached along a fairly narrow road, close to a completely blind double bend and without footways or level verges."
- Director of Planning Services, District Council
4. Planning refusal C90/0985 [Use of land for the erection of **a new dwelling and garage, Lower Rd** Grundisburgh] **1990**:
"The site lies within a Special Landscape Area. Serious injury would be caused to rural amenity by the formation of an additional residential unit and associated access works in the countryside. The proposed is not in the interest of highway safety being approached along a narrow road, close to a completely blind double bend and without footways or level verges."
- Director of Planning Services, District Council
5. Planning refusal C96/0023 [Erection of **one two-storey dwelling and detached double garage, Meeting Lane** Grundisburgh] **1996**:
"The development of this site would give rise to pressure to develop similar sites in Meeting Lane which it would be difficult to resist. Cumulatively this scale of development would undermine the open aspect and character of this part of Meeting Lane giving rise to 'village cramming'."
- Director of Planning & Leisure, District Council
6. Pre-planning advice [Village hall and **small residential development, Park Road** Grundisburgh] **2006**:
"Any Proposal to provide a village hall and small residential development with access taken from Park Road would not be supported by this Authority, as the surrounding vehicular and pedestrian links to the site are inadequate to support the development. The road network leading to the site consists of narrow and single track roads with no pedestrian facilities - this is unacceptable for such a development"
- Planning Officer, District Council
7. Application C11/2261 "Redevelopment of site to provide **two detached houses, Meeting Lane** Grundisburgh **2011**:
"Meeting Lane would not be suitable for a significant level of residential development, it is considered that two dwellings on the site would be acceptable"
- Planning Officer District Council

8. Planning refusal DC/16/3282 [Wood store, **Meeting Lane** Grundisburgh] **2016** (Site <100m from Chapel Field):

“The site falls within a Special Landscape Area and therefore Saved Policy AP13 applied. This states that no development will take place which would be the material detriment of, or materials detract from, the special landscape quality”.

- Arboriculture and Landscape Manager, District Council



CHAPEL FIELD
GRUNDISBURGH -
REVIEW OF REVISED
ACCESS PROPOSALS
March 2021

Alistair Turk
Traffic Consultant



1. Introduction and Background

- 1.1 A revised planning application for around 70 houses has been submitted at the beginning of 2021 by Hopkins Homes Ltd for the land known as Chapel Field. This includes a Transport Assessment by Cannon Consulting Engineers which is dated August 2020.
- 1.2 Access to the site was originally proposed from Chapel Road/Meeting Lane. The proposed Chapel Road access was deemed unfeasible by the Planning Inspector on the basis of the narrow width of the roads, lack of footways and the inability for widening mainly due to lack of available highway land.
- 1.3 The Planning Inspector has suggested the site should be amended so that vehicular access is taken off Park Road where it is stated that sufficient width of public highway should allow safe and suitable access to be achieved. The Planning Inspector has also noted the need to safeguard the setting of the nearby Grundisburgh Hall Historic Park and Garden which forms the southern boundary to Park Road.
- 1.4 INGENT Consulting Engineers produced a report dated 11th July 2019¹ which concluded that access from Chapel Road is unlikely to be acceptable as the width is between 3.2 and 3.4 metres and suggested that Park Road and Lower Road present more suitable routes of access to the site. It has not been possible to find evidence of how INGENT reached this conclusion was reached although it may be based on the landowner of Chapel Field also owning the land to the south of Park Road and most *but not all* the properties to the north of Park Road.
- 1.5 A Statement of Common Ground was agreed in October 2019 between the Developers and East Suffolk and Suffolk County Councils. It proposes a change to the supporting text in the Local Plan. It accepts that indicative access drawing No. 1812-296-001E demonstrates safe and suitable access arrangements can be achieved with passing places on Chapel Road and the widening of Park Road within land controlled by the highway authority and the site landowner.
- 1.6 It is understood that Freedom of Information requests have shown that indicative access drawing No. 1812-296-001C **did not** demonstrate that safe and suitable access could be achieved. In particular it showed that road widening would result in the removal of mature trees and hedge in direct conflict with policy 'SCLP 11.8 Parks and Gardens of Historic or Landscape Interest'. The drawing was revised to remove text without changing the general layout and became drawing No. 1812-296-001E.

¹ Ref 1812-296

1.7 Cannon Consulting Engineers have produced a Transport Assessment Report in August 2020 to examine the site's accessibility sustainability and transport impacts in relation to national and local planning policy. The Report also states that following a scoping discussion with Suffolk County Council where it was agreed:-

- Vehicular access to be taken from Park Road as per the agreed SoCG.
- Localised carriageway widening on Park Road between the site access and the junction with Ipswich.
- A vehicular passing place is required on Chapel Lane.
- A pedestrian connection to the existing PROW to the north of the site is essential to the acceptability of the site.
- The vehicle trip generation should be calculated using SCC "rural trip rates", supplied by SCC.
- It was agreed that off-site capacity modelling would not be required.
- The proposals should consider local safety improvements at the junction of Ipswich Road/ Park Road and Lower Road/Grundisburgh Road (B1079).

1.8 Cannon Consulting incorporated Suffolk County Council's comments in the Traffic Assessment of the traffic impact and the local highways improvements that can be made.

1.9 **Grundisburgh Parish Council believe:-**

- Park Road and Lower Road are unsuitable access routes for the development of Chapel Field;
- There is insufficient highway land to enable Park Road to be widened.
- Any road widening would have an impact on Grundisburgh Hall Historic Park and Garden and would require taking land from the front gardens of properties on the north side of Park Road;
- Lower Road is unsuitable to take additional traffic and is unable to be widened or straightened;
- Pedestrian and disabled access is inadequate.

This report considers the ability of the proposed access road network to accommodate traffic from the proposed development.

2. Existing Situation

- 2.1 The site known as Chapel Field is roughly 5.16 ha of agricultural land forming part of the Cranworth/ Grundisburgh Hall Estate. It lies around 700m south of the village centre where the majority of amenities are located, around 780 metres from the doctors surgery and around 380m from the primary school.
- 2.2 The site is bounded by Chapel Road/Meeting Lane on the east and Park Road on the south. The northern boundary is formed by the side gardens of properties on Meeting Lane and rear gardens of the Post Mill Estate. The majority of the western boundary is shared with Grundisburgh Recreation Ground.
- 2.3 Current access to the site from the public highway is via a field access located in the south-western corner of the site leading onto Park Road.
- 2.4 There is also a public footpath (footpath 20) within the site close to the northern boundary of the site linking Meeting Lane and Chapel Road to the east with Ipswich Road to the west via the Recreation Ground. This footpath is unmade grass/dirt throughout the site and Recreation Ground with the exception of the small length of footpath which forms part of the car park and shared access to the Recreation Ground from Ipswich Road.

3. Road Network

- 3.1 Chapel Field is located at the southern edge of the village centre and at the junction of Chapel Road/Meeting Lane running in a roughly north to south direction and Park Road/Lower Road running in a roughly west to east direction. The south-eastern corner of the site is adjacent to the cross roads of the aforementioned Roads and Bealings Road which is the southern arm of the crossroads and links to the villages of Great Bealings and Little Bealings.
- 3.2 Suffolk County Council has published its intention to designate Chapel Road, Chapel Lane, Lower Road, Meeting Lane and Park Road as 'Quiet Lanes' under the Quiet Lanes and Home Zones (England) Regulations 2006².

² SI 2006 No. 2082

- 3.3 The Department for Transport in its explanatory memorandum states:-
“Quiet Lanes are minor rural roads or networks of minor rural roads appropriate for shared use by walkers, cyclists, horse riders and other vehicles. The aim of Quiet Lanes is to maintain the character of minor rural roads by seeking to contain rising traffic growth”.

It goes on to state:-

“In a Quiet Lane it may be appropriate to use development controls, where the local planning authority (after consultation with stakeholders) considers it necessary, to control the generators or destinations of traffic to a level commensurate with the Quiet Lanes concept.”³

4. Suffolk Design Guide for Residential Areas

- 4.1 Suffolk County Council’s Design Guide for Residential Areas was published in 2000 and is used as supplementary planning guidance by all local authorities in Suffolk. The Suffolk Design Guide covers a number of design and development aspects but for the purpose of this report it is only the Highways requirements of the Design Guide which will be referenced in respect of the proposed development for Chapel Field.
- 4.2 The proposed Chapel Field development is for at least 70 dwellings. This falls within the ‘minor access road categorisation’. “Minor Access Roads are residential roads with footways that provide direct access to dwellings and parking spaces but would not normally serve more than 100 dwellings”. “Minor Access Roads serving more than 50 dwellings should normally be through- roads or looped”.
- 4.3 The Suffolk Design Guide stipulates road widths where no direct access to dwellings:-
- Between 50 and 300 dwellings – 5.5 metres;
 - Between 25 and 50 dwellings – 4.8 metres;
 - Up to 25 dwellings – 4.1 metres.
- 4.4 The Suffolk Design Guide also shows at figure 3.15 the 5.5 metre road width accompanied by 1.8 metre footways on either side of the carriageway. This brings the total width requirements of the highway to 9.1 metres for the scale of development proposed for Chapel Field.

³ DfT XX/2006. Para 4 and Para 5

- 4.5 While the Suffolk Design Guide primarily relates to land within the development boundary it would be reasonable to expect that consideration is also given to the suitability of the existing public highway network in the vicinity of a new development and the impact of the development on pedestrian and traffic flows.
- 4.6 National Planning Policy Framework (February 2019) (NPPF) contains overarching objectives to achieve sustainable development with a presumption in favour of sustainable transport with an expectation that “opportunities to promote walking, cycling and public transport are identified and pursued”⁴.
- 4.7 It is not unreasonable to expect that the Suffolk planning and highway authorities would apply broadly similar standards of minimum road and footway widths within the development and to the adjacent public highway network connecting the development to the rest of the village particularly in respect of achieving the objectives of NPPF.
- 4.8 The Suffolk Design Streets Guide (2020 edition) states:-
- “pedestrian routes are to be considered first and must be considered both within the site boundary and the surrounding area. The designer should consider **in detail** [added emphasis] how routes to local amenities such as shops, schools and public transport are achieved”⁵.*

5. Existing Road Layout

- 5.1 Access to Chapel Field was ruled out From Chapel Road/Meeting Lane as the width measurements were found to be generally between 3.2 metres and 4.4 metres which according to the Suffolk Design Guide is only capable of serving a maximum of 50 dwellings and already exceeds this number.
- 5.2 The Planning Inspector’s Report took the view that access from the site onto Chapel Road was not feasible as “Chapel Road is not feasible due to its narrow width, lack of footways and the inability for it to be suitably widened.”

⁴ Para 102 – National Planning Policy Framework (February 2019)

⁵ Para 2.3.1 Suffolk Design Streets Guide (2020 edition)

- 5.3 The INGENT Report claimed that Park Road/Lower Road presents a more suitable route of access to the site but no tangible evidence was provided to support this claim. The report acknowledges that Park Road is below the Suffolk Design Guide minimum width requirements but suggests there is “scope to widen the road in areas and form suitable passing sections” although no consideration of providing footways is considered.
- 5.4 The INGENT report goes on to consider Lower Road providing ‘a more suitable access route than Chapel Road/Meeting Lane’ but again provided no evidence on how it reached this conclusion. It proposes that pedestrian access to the site would be via the existing but improved public right of way (footpath 20). It appears that the report and drawings produced by INGENT (access drawing No. 1812-296-001E) were the basis for the Statement of Common Ground between East Suffolk Council, Suffolk County Council and the developers.
- 5.5 The Cannon Transport Assessment in section 2.3 makes an assessment of the local highway network by road name/location. In Section 2.5 it considers walking and cycling with an emphasis on footpath 20.

Lower Road

- 5.6 The Transport Assessment defines Lower Road as narrow but does not provide any data or width measurements. It does not appear to realise that Suffolk Highways have signed Lower Road as unsuitable to HGV traffic. The report appears to suggest that the **“slight widening in the S-bed on Lower Road facilitates passing traffic”** which is not the experience of most highway users as the average carriageway width through the bends is 3.6 metres.
- 5.7 It also states there are **“a mixture of informal passing places within highway”** to the east of the S-bend. The reality is that this section of Lower Road has hedges up to the edge of the carriageway. The only potential passing places are the driveways of adjacent properties which are not generally considered to be part of the public highway.
- 5.8 The report goes on to state that all properties appear to have off-street parking and implies that no on-street parking takes place. In reality on-street parking of two or more vehicles does take place on the widest section of Lower Road (to the north-west of Brook Cottage as can be seen on Google Street View).

Park Road

- 5.9 The report defines Park Road is a rural road serving eight properties (there are actually nine) and is signed as unsuitable for HGV traffic. At paragraph 4.3.1 it states there are no footways and goes on to state there is no pedestrian desire line on Park Road without substantiating the statement. It appears to ignore the needs of the existing residents to gain pedestrian access to the local amenities and of the many pedestrian who use Park Road for leisure pursuits.

Walking and Cycling

- 5.10 The Transport Assessment consideration of walking and cycling is contained in Section 4.3 of the report. It has a focus on the public right of way (footpath 20) which is at the northern boundary of the site and links Meeting Lane in the east with Ipswich Road in the west.
- 5.11 Apart from the section heading there is nothing in the Transport Assessment about cycling provision from the site to the wider highway network but by association it appears that footpath 20 is proposed to serve that purpose which would presume a shared footpath and cycle track. Paragraph 3.3.14 of the Suffolk Design Streets Guide states that shared footway and cycle tracks “must be at least 3m wide”. Footpath 20 currently includes measures to prevent/ deter cycling on this route. **Clarification is needed on the developers proposals as a matter of urgency.**
- 5.12 The Transport Assessment highlights the connection of footpath 20 with a footway to Post Mill Orchard as the direct route to the centre of Grundisburgh and all local amenities. The report does not appear to realise that the path to Post Mill Orchard is not a public right of way nor is it public highway or publicly owned/ maintained. The path serves as a permitted path primarily as an access for residents of Post Mill Orchard to the Recreation Ground.
- 5.13 There is no evidence that the developers have the agreement of the land owners to include this pedestrian/cycle route option from footpath 20 to Post Mill Orchard in the planning application and this needs to be **clarified as a matter of urgency.**
- 5.14 There is also no evidence in the Transport Assessment or planning application documentation that the developers have agreement from Fields in Trust for the proposal to use and improve footpath 20 where it passes over the Recreation Ground.

- 5.15 There is a significant change in level on the Recreation Ground (approximately 1:9) by the path to Post Mill Orchard and between the grassed area and car park on the Recreation Ground. This would need to be resolved in order to achieve the “gently sloped gradients” specified in the Suffolk Design Street Guide of between 1:60 and 1:20 that are required for safe pedestrian and disabled access. No details are shown on plans forming part of the planning application on how this would be resolved.
- 5.16 The change in level is potentially more problematic to resolve along the path to Post Mill Orchard as changing the gradient could have a negative impact on the foundations of adjacent buildings immediately abutting the path.
- 5.17 The Transport Assessment appears to ignore the easterly end of footpath 20 where the path joins Chapel Road/Meeting Lane. This is likely to be the natural desire line of pedestrians (and cyclists) wanting to go by the shortest route to the village centre. The width of footpath 20 at the eastern end where it runs between the electricity sub-station and the adjacent property significantly narrows between the hedges to around 0.8m which is considered too narrow for the amount of pedestrians likely to use this route from the development and is unsuitable for cyclist use.

6. Suitability of access proposals

- 6.1 In order to test the validity of the INGENT report and the statement that Park Road/Lower Road provides a ‘more suitable’ access to the proposed development, a measured survey of existing highway widths was taken at 10 metre intervals along the whole length of the Park Road/Lower Road proposed access route to assess the suitability and the basis of The Statement of Common Ground.
- 6.2 There are no standard or minimum design standards for existing rural roads which makes the assessment of suitability somewhat difficult. One factor that is established and can be applied is the Planning Inspector’s view of what is unsuitable in respect of access proposals to Chapel Field.
- 6.3 Chapel Road was considered an unfeasible access on the basis of the narrow width of the roads, lack of footways and the inability for widening mainly due to lack of available highway land. The carriageway width on Chapel Road was stated by the developers engineers to be between 3.2m and 3.4m.

- 6.4 One option would be to use the Manual for Streets (MfS) published in 2007 although this focuses by its own admission on lightly-trafficked residential streets but **may** be applicable to lightly trafficked lanes in rural areas. The MfS states it **does not stipulate or make recommendations on carriageway widths** which appears to rule out its use as a guide to determining acceptable carriageway widths.
- 6.5 The MfS in its introduction “***strongly recommends...local authorities review their standards and guidance to embrace the principles of the MfS.***” The authorities in Suffolk have appeared to follow this recommendation and produced the Suffolk Design Guide which is stated as providing supplementary planning guidance.
- 6.6 The Suffolk Design Guide sets out the parameters as they apply for roads in new developments on the basis that what is required for the safe passage of pedestrians, cyclists and vehicles within the development. While not stated, it would be reasonable to assume that a similar consideration would apply to the rural road network immediately leading to and from the development. On this assumption and based on the scale of the proposed development the Suffolk Design Guide stipulates a carriageway width of 5.5m and footways of 1.8m on either side of the carriageway making an overall highway width of 9.1m.
- 6.7 Yet another approach would be to apply the criteria used by most highway authorities putting in diversions on rural roads. These typically take account that a minimum width of 5.5 metres is needed for two cars to pass safely at low speed. The width is increased to 6m with occasional use by buses or heavy goods vehicles and 6.8m where buses and HGVs need to pass each other on a regular basis. Where the rural road is deemed to be single-track it should be 3.5m but with inter-visible passing places at around 200m spacing where the width of single-track road and passing place should be at least 5.5m.
- Survey Results Park Road**
- 6.8 Park Road is approximately 480 metres in length. The southern boundary of Park Road abuts Grundisburgh Hall Historic Park and Gardens and is formed by a hedge/tree boundary directly adjacent to the carriageway. The only exception is at the eastern end where there is a slight vision splay at the cross roads of Park Road, Chapel Road, Lower Road and Bealings Road. These are steeply banked (as the roads at this location are in cutting) which would prohibit the required road geometry within highway land.

- 6.9 The Planning Inspector's report requires the safeguarding to Grundisburgh Hall historic park and gardens which is assumed to prohibit any road widening along the southern boundary which would encroach on the Historic Park, the mature hedge/tree boundary to the Park and the roots of the mature parkland trees within the Park.
- 6.10 Chapel Field makes up roughly 180m of the northern boundary of Park Road measured from the junction of Chapel Road in a westerly direction. Eighteen width measurements were taken at 10 metre intervals along this length of Park Road. The measurements were:-
- The maximum width (and the maximum width along Park Road) was 4.9m measured at the current field access to Chapel Field.
 - The minimum width is 3m.
 - The average width is 3.9m.

These are all well short of the 5.5m minimum width to allow 2 cars to safely pass at low speed. It should be noted that there is capability for widening to meet these requirements within the curtilage of Chapel Field although level changes between the field and existing carriageway in cutting would need to be resolved.

- 6.11 Continuing past Chapel Field in a westerly direction there is around 40m of frontage to a former allotment/market garden directly to the north-west of Chapel Field (assumed to be part of the Cranworth Estate) and then roughly 260m of frontages to nine dwellings on the north side of Park Road and including 30m of frontage to the Recreation Ground.
- 6.12 The carriageway in this section of Park Road is elevated above the surrounding land on both sides of the carriageway. There is no verge/highway land on either side of the carriageway. On the north side almost all properties have a mature hedge/fence as the boundary directly adjacent to the carriageway edge. On the south side there are also mature hedges directly adjacent to the carriageway and interspersed with trees within the hedge line that forms the boundary of Grundisburgh Hall historic park. Immediately behind this hedge line is a ditch and parkland with mature trees forming part of the park setting in close proximity to the boundary hedge.
- 6.13 Most properties on the north side of Park Road have some off-street parking but No.8 does not, resulting in on-street parking around this location.

- 6.14 Thirty width measurements were taken at 10 metre intervals along this length of Park Road. The last two measurements taken within the widening junction to Ipswich Road (6 metres and 18 metres at the give way junction markings) have been omitted as they are non-representative and have the potential to skew the median width figures. The measurements were:-
- The maximum width (and the maximum width along Park Road) was 4.9m measured at the access to the Old Police House (privately owned and not part of the landholders land).
 - The minimum width is 3m.
 - The average width is 4.3m.
- 6.15 These are all well short of the 5.5m minimum width to allow 2 cars to safely pass at low speed. There are no footways or provision for pedestrians to enter or leave properties on Park Road or to facilitate the safe passage of pedestrians along Park Road to reach the bus stop at the junction of Park Road/ Ipswich Road without walking within the trafficked area of the carriageway.
- 6.16 The INGENT drawing No. 1812-296-279B titled S.278 Road Widening is the basis of the developer's proposal for improving access and road widening on Park Road and appears as an Appendix to the Cannon Transport Assessment. The drawing shows proposed widening of only 4.8m and no footway provision whatsoever even though the Suffolk County Council highway comments to an earlier planning submission required the provision of ***“good walking links to reach the existing [bus] stops on Ipswich Road.”***
- 6.17 The developers proposed 4.8m widening of Park Road appears to be based on figure 7.1 in the Manual for Streets even though it caveats the drawing as not being a recommendation. Paragraph 7.2.2 of the MfS stipulates that carriageway widths should be appropriate for the particular context and key factors to determining the width include:
- The volume of vehicular traffic;
 - The traffic composition;
 - The demarcation, if any between carriageway and footway;
 - Whether on-street parking is to take place;
 - The design speed (recommended to be 20mph or less).

- 6.18 The absence of footways and on-street parking make a proposed width of 4.8m difficult to justify on purely highway safety grounds and without a reduction in speed limit to 20mph or less. The proposal is inappropriate and unsafe without a carriageway width of 5.5m and the provision of at least one footway of at least 1.8m in width.
- 6.19 The INGENT road widening drawing does not appear to take account of the change of level from the elevated existing carriageway and the lower levels of the surrounding land of the Park Road properties on the north side or Grundisburgh Hall Historic Park and Garden on the south.
- 6.20 Any widening of the highway is likely to require more land than currently shown on the plan (even at the 4.8m width proposed) to enable the level changes to be accommodated safely. This would result in a greater loss of boundary hedges and front gardens to the properties fronting Park Road. This in turn would impact on access to front doors and the potential loss of off-street parking within the much reduced front gardens.
- 6.21 The earlier Suffolk County Council comments that good walking links to the bus stop on Ipswich Road be provided would necessitate widening of the highway beyond the limits shown on the INGENT plan to the detriment of residents on Park Road and/or The Grundisburgh Hall historic park and garden. While the majority of the dwellings on the northern side form part of the Cranworth Estate, the first property, at the junction of Ipswich Road and Park Road and the Old Police House and the Recreation Ground (which are roughly midway in this section) are understood not to form part of the Estate and outside of the control of the landholder.

Survey Results Lower Road

- 6.22 Lower Road is approximately 620m in length and runs as a continuation of Park Road in the west to the B1079 Woodbridge Road in the east. There are no footways on any of Lower Road. There are 3 junctions along its length leading to Chapel Lane, Pine Grove and The Driftway (and Millennium Meadow).
- 6.23 There are two narrow 90 degree bends located at The Driftway junction and continuing eastward around Pyntle Hall where the edge of the highway abuts outbuildings associated with Pyntle Hall. Both bends are narrow with average widths of around 3.6m. Lower Road is deemed unsuitable for goods vehicles by the Highway Authority and signing informing motorists are located at the entrance to Lower Road. There is evidence of past collisions with the building abutting the highway at the bend at Pyntle Hall.

- 6.24 The first roughly 70m of Lower Road from the junction with Chapel Road is in cutting thereafter the steep bank continues on the southern boundary for roughly a further 130m while the northern boundary is roughly at grade with the carriageway and is lined with dwellings on the northern boundary.
- 6.25 67 width measurements were taken at 10 metre intervals along the length of Lower Road. The measurements were:-
- The maximum width (and the maximum width along Lower Road) was 4.6m measured at the current access to Brook Cottage (south side) and Hawthorn Cottage (north side). On-street parking occurs at this location reducing the available width to around 2.6m.
 - The minimum width is 2.7m.
 - The average width is 3.7m.
- 6.26 Lower Road currently directly serves 24 dwellings and with its continuation into Park Road, 33 dwellings. The proposed development of Chapel Field would add a further 70 dwellings raising the total number to around 103 dwellings – accessed from a road that is narrower than the minimum width the Suffolk Design Guide stipulates can serve a maximum of only 25 dwellings.
- 6.27 There is not sufficient available highway land along Lower Road to achieve the required road geometry to accord with the Suffolk Design Guide requirements for the existing dwellings let alone the additional numbers of dwellings associated with the proposed development.
- 6.28 There is also insufficient visibility at the S-bend and in a northerly direction at the junction of Lower Road with the B1079 and insufficient highway land to enable an adequate vision splay to be created.
- 6.29 Based on the Planning Inspector’s assessment of access suitability Chapel Road was deemed unsuitable with carriageway widths of between 3.2m and 3.4m. Lower Road has carriageway widths of between 2.7m and 3.7m and on-street parking and an S-bend with insufficient visibility or width to allow for vehicles to pass. Following the same assessment criteria that ruled Chapel Road as unsuitable It is difficult to see how the same conclusion would not be drawn that Lower Road is deemed unsuitable.
- 6.30 Suffolk County Council require the proposals to consider local safety improvements of the junction of Lower Road and the B1079 where poor visibility is the primary concern. INGENT have produced proposals detailed on drawing No. 1812-296-009 dated July 2020. The drawing shows in red the highway boundary which extends beyond the edge of carriageway.

- 6.31 The text within the INGENT drawing states that the Land Registry records the extent of the highway only to the edge of the carriageway. INGENT would like to assume that the Land Registry are wrong as it makes the provision of improved visibility easier to achieve. The developer and highway and planning authorities cannot reasonably accept the INGENT presumed/hoped extent of highway boundary as fact without evidence that the Land Registry records are incorrect.

7. Traffic Generation

- 7.1 The Cannon Transport Assessment contains automated traffic count (ATC) data collected for a seven day period in January 2020 on Lower Road and states that as it was collected pre-Covid-19 they are representative of 'normal' traffic conditions. This is debatable. Traffic flow in winter months can be lower and is not necessarily representative of traffic flow throughout the year.
- 7.2 A second set of traffic counts was undertaken for a seven day period commencing on the 9th June 2020 on Ipswich Road at the junction of Park Road and the B1079 at the junction with Lower Road. The Transport Assessment recognises that the data collected is not representative due to the ongoing Covid-19 lockdown measures but chooses to use the results in the report rather than carry out further counts after lockdown had ended.

Speed data

- 7.3 The speed data collected shows average speeds slightly above the 30 mph limit on Ipswich Road and about 10mph above the speed limit on Grundisburgh Road but makes no recommendations for measures to reduce 85th percentile speed at the junctions of Park Road and Lower Road other than a solar powered 30mph vehicle activated sign.
- 7.4 The speed data on Lower Road shows an 85th percentile in accordance with the 30mph limit but makes no assessment if such speeds are appropriate for a narrow single track road with no footways and with an S bend with poor forward visibility.

Trip generation

- 7.5 The trip rates in the Transport Assessment are based on 80 dwellings and appear to be based on figures provided by SCC and indicate 54 AM vehicle trips and 53 PM vehicle trips. This appears very low at around 0.6 vehicle movements per household.

- 7.6 By contrast the estimated trip rates for the proposed development can be derived from TRICS using Land Use Category 03/A – Houses Privately Owned. Daily trip rates of 5.3 vehicle movements per dwelling or 371 vehicle movements per day.
- 7.7 Accurate projected trip generation figures from the proposed development are essential to assess the likely impact on the existing rural road network. The Transport Assessment at Table 5.3 shows a projected distribution of 57% of trips in a westerly direction along Park Road towards Ipswich Road and 43% in an easterly direction along Lower Road which is considered a reasonable split.
- 7.8 The Transport Assessment figures based on SCC data projects 62 additional vehicle movements per day along Park Road toward Ipswich Road and 46 additional vehicle movements along Lower Road towards Woodbridge.
- 7.9 Trip generation based on TRICS land use category 03/A and using the same proportions in Table 5.3 shows a projected distribution of 57% or 211 additional trips per day in a westerly direction along Park Road towards Ipswich Road and 43% or 160 additional trips in an easterly direction along Lower Road.
- 7.10 The COVID-19 pandemic has resulted in changes to working practices with more people working from home. It has also resulted in a significant increase in home deliveries which is unlikely to change post-pandemic.
- 7.11 While it is likely that some degree of home working will become the norm after the country returns to a normalised post-COVID-19 environment it is still difficult to believe that the development would only generate 0.6 vehicle movements per household.

8. Traffic Generation

- 8.1 The Planning Inspector 's report requires the “provision of safe and suitable pedestrian access to services and facilities in the village is required so as to be consistent with national policy”.
- 8.2 The developers are proposing a network of footways within the development connecting to the existing public right of way (footpath 20) to the north edge of the Chapel Field boundary.

8.3 Footpath 20 connects Ipswich Road to Meeting Lane through Chapel Field and Grundisburgh Recreation Ground. The footpath is unmade grass/dirt except for a short section where it forms part of the macadamed shared access drive between the dwellings on Ipswich Road to the Recreation Ground.

8.4 The Suffolk Design Guide stipulates that where routes link housing areas with schools, community centres and employment areas the minimum widths should be:-

- Cycleway – 2m;
- Footway – 1.8m.

The Suffolk Design Streets Guide 2020 stipulates a shared footway/cycle track width of at least 3m.

8.5 The Guide stipulates that pedestrian routes must meet the needs of elderly people and people with disability and have practical gradients of between 1:20 and 1:60.

8.6 The Guide stipulates a minimum forward visibility distance of 15 metres measured along the centre-line. A greater width may be required where the facility abuts walls or visibility is below the required standard.

Proposed footway access to the west of the proposed development

8.7 It is unclear if there has been any discussion with the developers and Fields In Trust who own Grundisburgh Recreation Ground about the proposed pedestrian routing and the requirement to construct a paved pathway across the Recreation Ground to meet the requirements of the Suffolk Design Guide. The Parish Council understand from a conversation that Fields in Trust would not allow any loss of the grass Recreation Ground by the construction of footways and ramping on their land.

8.8 It is also unclear if there has been any discussion with the developers and the owners of the path to Post Mill Orchard about the proposed pedestrian routing along this path. The path is not a public right of way. The proposed pedestrian routing would require revisions to the link footpath to Post Mill Orchard to achieve practical gradients to meet the needs of the elderly and the disabled. This would potentially have an impact on the adjacent properties whose garage blocks directly abut the path.

Pedestrian routing to the east of the proposed development

- 8.9 The INGENT report ruled out pedestrian access between the site and the village centre stating “as well as inadequate road width it would not be practical to create a footway connection along Meeting Lane due to existing constraints.”

9. Summary

- 9.1 The assessment has been prepared for Grundisburgh Parish Council in response to the proposed development of 5.16ha of agricultural land known as Chapel Field for around 70 dwellings for open market housing. The principal findings of this assessment are summarised below.
- 9.2 The Statement of Common Ground agreement between county and district councils and the developer's statement that a safe access can be achieved to Park Road/ Lower Road with local widening is debatable as plans indicate it would involve removal of mature hedgerow and trees from Grundisburgh Hall historic park and garden which is in direct conflict with policy ‘SCLP 11.8 Parks and Gardens of Historic or Landscape Interest’.
- 9.3 Grundisburgh Parish Council do not believe Park Road/ Lower Road does provide a safe access for the scale of the proposed development.
- 9.4 The developer's proposed solution for a safe access on and along Park Road/ Lower Road does appear to cherry-pick certain aspects of carriageway design guidance in isolation without applying the full guidance. This approach is unsound and does not establish safe access for vehicles **and** pedestrians can be achieved on Park Road.
- 9.5 It does not take account of the need for safe pedestrian access along Park Road for existing residents or for residents of the proposed development wishing to use public transport from the bus stop at the junction of Park Road/ Ipswich Road.
- 9.6 It ignores the needs of the many walkers, cyclists and horseback riders who already use Park Road and Lower Road for leisure and health reasons. It ignores the County Council's intention to designate Park Road, Lower Road and linking roads as Quiet Lanes.

Chapel Road

- 9.7 Vehicle access to the site from Chapel Road/Meeting Lane was deemed unfeasible by the Planning Inspector due to its narrow width, lack of footways and the inability for it to be suitably widened. In spite of this the developer is proposing a number of properties having direct access from Chapel Road which would appear to be in contradiction to the Planning Inspector's findings.

Lower Road

- 9.8 The Statement of Common Ground has agreed access to the site will be to the southern boundary of Chapel Field onto Park Road/ Lower Road which forms an east/west link between Ipswich Road in the west and the B1079 and A12 to the east.
- 9.9 Suffolk County Council requested measures for the improvement of the junction of Lower Road with the B1079. Drawing No. 1812-296-009 dated July 2020 include proposals to improve vision splays on land claimed as highway although stating on the drawing that the Land Registry shows the extent of the carriageway. The query over land ownership needs to be resolved and there is no evidence within the submission that the developer or highway authority have done so.
- 9.10 Lower Road is narrow and has no footways. It is signed as unsuitable for HGV vehicles. Like Chapel Road there is a lack of highway land to enable it to be widened. The S-bend is narrow, impedes visibility and is not wide enough to allow for the safe passage of vehicles. There are no formal or informal passing places, only private driveways where vehicles can pull in and allow oncoming vehicles to pass.
- 9.11 Trip generation from the proposed development and based on TRICS data projects around 160 additional daily trip generation along Lower Road.
- 9.12 The minimum width of Lower Road is 2.7m and a maximum width of 4.6m where on-street parking occurs resulting in a reduction of width to 2.6m. This is less than the minimum 4.1 metres requirement for up to 25 dwellings according to the Suffolk Design Guide. The existing properties already exceed this number before adding an additional 70 dwelling from the proposed development.
- 9.13 Vehicle speed shows an 85th percentile at 30mph which is within in the signed speed limit but due to the lack of footways and shared use and poor visibility it is arguable that the speed limit should be reduced to 20mph.

- 9.14 Suffolk County Council have advertised its intention to designate Lower Road as a Quiet Lane that is shared use by walkers, cyclists, horse riders and vehicles. The aim of Quiet Lanes is to maintain the character of minor rural roads by seeking to contain rising traffic growth. The proposed development would result in an increase of traffic by around 160 additional trips a day and is in direct contradiction to the concept of Quiet Lanes.
- 9.15 **Lower Road has a useable carriageway width which is less than the carriageway width of Chapel Road which was deemed unsuitable as an access route to Chapel Field by the Planning Inspector. The unsuitability due to the narrow width of the roads, lack of footways and the inability for widening mainly due to lack of available highway land also applies to Lower Road.**
- Park Road
- 9.16 The Statement of Common Ground agrees the widening of Park Road to provide 'safe and suitable access arrangements'. The proposed widening is shown on drawing No. 1812-296-279B titled S.278 Road Widening and proposes a carriageway only widening of 4.8m.
- 9.17 It would appear that proposed 4.8m carriageway width is derived from figure 7.1 in Manual for Streets. Manual for Streets states **does not stipulate or make recommendations on carriageway widths** which appears to rule out its use. The MfS in its introduction ***“strongly recommends...local authorities review their standards and guidance to embrace the principles of the MfS.”***
- 9.18 Figure 7.1 cannot be used, even as a guide in isolation but must take account the stipulations contained in paragraph 7.2.2. The developers proposals have not taken into account:-
- The volume of vehicular traffic;
 - The traffic composition;
 - The demarcation, if any between carriageway and footway;
 - Whether on-street parking is to take place;
 - The design speed (recommended to be 20mph or less).
- 9.19 When these are applied to Park Road it shows that a width of 4.8 metres is not sufficient to provide for the safe passing of vehicles and safe passage of pedestrians without a footway and without a speed limit of 20mph or less, none of which form part of the submission.

- 9.20 The authorities in Suffolk have followed the MfS recommendation and produced the Suffolk Design Guide which is supplementary planning guidance. It should follow that the minimum widths contained in the Suffolk Design Guide should be applied to the widening of Park Road which are a carriageway width of 5.5m and footways of 1.8m.
- 9.21 The proposed widening shown on drawing No. 1812-296-279B cannot currently fit within the highway boundary. It encroaches on Grundisburgh historic Park and Garden and the gardens of all the properties on the north side of Park Road and involves the loss of mature hedges and boundary trees. Furthermore the plan does not take account of the change in level between carriageway and surrounding land which would result in a greater encroachment of Park land and gardens than is shown. A safe access width widening would take even more land and could not realistically be achieved within the requirements of the Planning Inspector to protect Grundisburgh Hall historic park and garden.

Trip Generation

- 9.22 The stated trip generation of around 0.6 vehicle movements per household from the proposed development is not credible. TRICS data for Land Use Category 03/A (Houses Privately Owned) show daily trip rates of 5.3 vehicle movements per dwelling or 371 vehicle movements a day from the proposed development.

Cycling provision

- 9.23 It is unclear what provision is made for cyclists from the proposed development.

Pedestrian provision

- 9.24 It is still unclear if the proposal to improve FP20 where it enters and crosses the Recreation Ground has agreement of Fields in Trust. The proposal to link to Post Mill Orchard ignores that this is not a public right of way and is not highway land.
- 9.25 No evidence is provided that the landowners have been approached or agreed to this proposal.
- 9.26 No detail is provided on how the significant gradients or visibility impairment will be resolved along the western end of this route.
- 9.27 No detail has been provided on how the poor visibility and narrow eastern end will be resolved.

9.28 No proposal has been submitted to show how the requirements of Suffolk Highways for 'good walking links' from the proposed development to reach the bus stops at the junction of Park Road/ Ipswich Road can be met.

Lower Road/Grundisburgh Road B1079

9.29 The proposed junction improvement is shown on land the Land Registry records indicate is not public highway. This needs to be resolved and land owners/ frontager agreement obtained to establish if the scheme, as proposed, is viable.

10. Conclusion

10.1 The statement that a safe and suitable vehicular access to Chapel Field can be achieved from Park Road/Lower Road within the width of public highway is not supported by the proposed drawing.

10.2 The design standards the developer is proposing are not fit for purpose as they do not take account of speed or the requirement of good and safe pedestrian facilities.

10.3 Land contours and actual measurements of the carriageway indicate far greater land will be necessary to suitably widen Park Road and there will be a direct conflict it is impossible to achieve with planning policy 'SCLP 11.8 Parks and Gardens of Historic or Landscape Interest'.

10.4 It has not been demonstrated that suitable pedestrian and cycle access can be achieved using FP20.

10.5 It has not been demonstrated that agreement with landowners has been reached for changes to land that is not public highway and not in the landholder/developers control.

10.6 Vehicle trip generation will be significantly higher than stated in the Cannon Transport Assessment and will have a significant and detrimental impact on the surrounding rural road network.

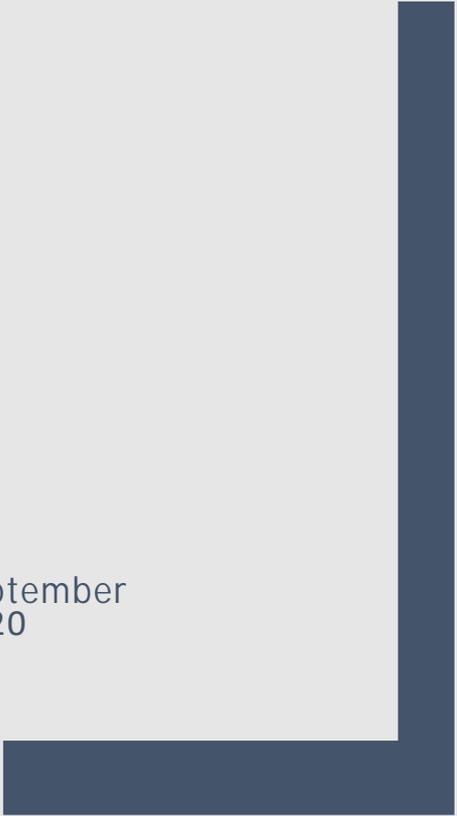
10.7 Lower Road is an unsuitable access route as it has no footways and is narrower than Chapel Road which was ruled out by the Planning Inspector as a suitable access route.



DC/20/3284/FUL & DC/20/3362/FUL
Land to the West of Chapel Road, Grundisburgh

GRUNDISBURGH & CULPHO PARISH COUNCIL'S RESPONSE

September
2020



October 2020

Land to the West of Chapel Road, Grundisburgh

Grundisburgh & Culpho Parish Council (G&CPC) object in the strongest possible terms to the 2 applications listed above submitted for the same site by Hopkins Homes (HH). The planning applications are contrary to the recently adopted Development Plan East Suffolk Council - Suffolk Coastal Local Plan and breach the Habitat Regulations.

The Inspector noted in paragraph 166 of his final report that the proposal “has attracted a considerable number of representations”. East Suffolk has received 351 objections to the 2 applications in addition to the 650 signatures objecting to Hopkins Homes initial Masterplan.

DESIGN AND ACCESS STATEMENT submitted with the planning application

4.0 STATEMENT OF COMMUNITY INVOLVEMENT states:

5.3 As fully detailed in the accompanying Statement of Community Engagement prepared by Engage Planning, a public exhibition was held at Grundisburgh Village Hall on Monday 20th January 2020, between 3pm and 7.30pm. Representatives from Hopkins Homes and the project team were in attendance to talk through the proposals and answer questions.

5.4 A total of 180 people attended the event and 105 comment forms were returned. The comments forms asked a number of questions:

Question 1 Grundisburgh is identified as a ‘Large Village’ in the District Council’s forthcoming Local Plan, reflecting its range of services and facilities, and is recognized as a sustainable location to accommodate further housing development. Do you agree that Grundisburgh is a suitable location to accommodate a proportion of the required new housing in the area?

Only 3% answered YES

Question 2 Do you support the principle of residential development on this site, including affordable housing and areas of public open space, as broadly shown on the Concept Masterplan?

Only 3% answered YES

The community was so incensed as a result of seeing the HH proposals for Chapel Field on 20th January including their statement: *We have a Planning Application ready to go, that G&CPC organised a petition, collecting 650 signatures, with the following heading: **We the under signed say NO TO HOPKINS HOMES PROPOSAL TO BUILD ON CHAPEL FIELD GRUNDISBURGH.***

Grundisburgh is just about the right size, the community is able to take care of each other. Grundisburgh does not need 500 more vehicle movements per day, the centre of the village is already showing the strain from the amount of traffic that has to go through now. The facilities, surgery, school, village hall, shops and play area in Grundisburgh can just cope with the population as it is.

All the roads abounding the site are narrow lanes with no footways, totally unsuitable for the proposed increase in traffic 80+ dwellings would bring.

We ask COUNCILLORS of the newly formed East Suffolk District Council to say NO to any development on Chapel Field.

That Petition was emailed to Democratic Services on 29th September.

The community has consistently objected to the proposed development of the land west of Chapel Road on sound planning grounds. The Planning Inspector examining the Local Plan recognized that the original allocation was unsound and therefore it is incumbent on the Local Planning Authority to assess the proposal properly.

5.0 PLANNING POLICY CONTEXT

5.8 The Core Strategy and Development Management Local Plan which has now been superseded covered the period 2010 to 2027. Strategic Policy SP2 – Housing Numbers and Distribution had allowed a provision of at least 7,900 new homes across the District over the period 2010 to 2027. Grundisburgh was not allocated housing in the Core Strategy.

However, between 2010 and the present day, 48 properties have been built in Grundisburgh on windfall sites.

Housing Land Supply

5.19 According to the Statement of Housing Land Supply as of 31st March 2019 (published August 2019), Suffolk Coastal Local Plan area can demonstrate a 7.03 year land supply for the period. Paragraph 11 d) of the NPPF 2019 is therefore not engaged.

The East Suffolk Council - Suffolk Coastal Local Plan adopted by East Suffolk Council on 23rd September 2020.

The Planning Applications conflict with:

1) Policy SCLP2.2 (c): Strategic Infrastructure Priorities

- The Air Quality assessment has concluded that there will be no impact on the Air Quality in the AQMAs which is contrary to the published evidence and Statement of Common Ground that East Suffolk District Council signed on 10th January 2020. The Transport Mitigation Strategy for the Ipswich Strategic Planning Area identifies the Air Quality issues in Ipswich and shows that 28% of the trips in and out of Ipswich originate from the Suffolk Coastal District which includes this site.
<https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/ISPA-Transport-Mitigation-v13F.pdf>
- Paragraph 12 of the Statement of Common Ground effectively states that the Local Authorities will help implement the findings in the Transport Mitigation Strategy, but the Air Quality assessment fails to acknowledge that there is an issue. The Air Quality assessment cannot have used the available evidence to help inform its decision.
https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/62657829.1/PDF/-/J29_Note_on_Ipswich_Strategic_Planning_Area_Statement_of_Common_Ground_January_2020.pdf

2) Policy SCLP5.1: Housing Development in Large Villages

- The proposed development is inappropriate in size since it would increase the number of dwellings in the village by some 15%.
- The location is inappropriate, separated as it is from rest of village in the countryside.
- Inappropriate in character, it replicates other Hopkins sites, as opposed to essential Grundisburgh character.

Every other estate built in Grundisburgh in the last 50 years, has direct access onto the C323 the main route through the village.

The Grundisburgh and Burgh Joint Conservation Area Appraisal Supplementary planning Document June 2010 describes Grundisburgh thus:

The prevailing character of the conservation area, despite much recent adjacent and infill modern housing development, is one where the traditional appearance and ambience of the village remains very much intact. Some of the new housing could have been better integrated in design and layout terms, but its effect is limited. Grundisburgh's appearance is one of the most attractive in the District.

3) Policy SCLP7.1: Sustainable Transport

- Site is disproportionate with scale of existing transport network
- Site does not provide safe pedestrian and cycle access to services and facilities
- Site is not well integrated into the existing cycle network and, moreover, will make existing routes along Lower Rd and Park Rd more hazardous
- Site negatively impacts existing routes to the south as increased traffic will deter pedestrian use of Lower Rd and Park Rd on foot
- The development will increase the level of conflict between non-motorists and motorists on the surrounding road network, thereby decreasing road safety
- The cumulative impact of new development will create severe impacts on the existing transport network. A 30% increase in traffic volumes will exacerbate the existing inadequate road sections and hazardous junctions

See detailed papers: Access Proposals, **Appendix A**, and Response to Traffic Assessment, **Appendix B**.

4) Policy SCLP8.2: Open Space

- Development will impact the character and value of the PROW to the north of the site
- Development, through increased traffic and no footway provision, will deter use of the roads/PROWs to the south, thereby impacting enjoyment of Assets including the Millennium Meadow, Grundisburgh Hall Park & Gardens and even the Playing Field itself.

5) Policy SCLP10.1: Biodiversity and Geodiversity

- The need to widen Park Rd will, at minimum, require loss of veteran hedgerows and trees. The proposed road surface will extend beyond the centre line of hedgerows and approach to within 6' of tree trunks - both terminal effects for those specimens.
- The Ecological Appraisal has not discharged the Council's Statutory Obligations as explained in Circular 06/05 Biodiversity and Geological Conservation and the Habitat Regulations.
- The species survey has not been undertaken and so the reliance that can be placed on the ecological results is limited. Bat surveys should be undertaken between May and September when bats are most active. The Ecological Appraisal states that the site was surveyed in November and there is no indication that the site has been surveyed for protected species.
- Paragraph 12.559 of the recently adopted Local Plan states: *Priority Species have been identified on land close to the site*, and therefore an ecological survey, along with mitigation if necessary, will be required as part of any proposal. The proposal is contrary to the Development Plan.

6) Policy SCLP10.3: Environmental Quality

- Development requires use of unsustainable transport methods (car)
- Development destroys agricultural land

Hopkins Homes submitted DC/20/2643/EIA Environmental Impact Assessment. On July 30th East Suffolk planning decision was issued stating an EIA 'not required' for the planning application to be submitted for Chapel Field. Grundisburgh and Culpho Parish Council appealed that decision with the Secretary of State for Housing, Communities and Local Government, The Rt Hon Robert Jenrick MP, and are awaiting a decision on that appeal.

7) Policy SCLP10.4: Landscape Character

See detailed paper Landscape and Visual Impact Assessment, **Appendix C**.

8) Policy SCLP11.1: Design Quality

- The proposed development is not locally distinctive, and ignores key features of local character (see conservation area/housing clusters on village periphery)
- The proposed development does not enhance local features through innovative nor creative means (the site plan is just a 'drag and drop' of pre-designed units)
- The development looks inward to Post Mill/Alice Driver/Felgate Way for its 'local context', when it should actually be looking outward to Chapel Rd, Park Rd and Lower Rd
- The layout is totally distinct from the existing neighbourhood layout, and will impose itself negatively on existing people and vehicle movements
- The development will not only rob existing residents of their immediate connection to the countryside but also, through its design, it will deprive new residents from any connection by hiding them in the midst of an enclosed housing estate with no safe means to access the open countryside to the south
- The Flood Risk Assessment indicates that there is an 8 metre drop over the field, but there is no datum point, or proposed/existing levels shown on the plans. Without this information the Local Planning Authority will not be able to assess the application and the local residents are not being informed about the true proposal.
- The site cannot be accessed easily by all, due to the pedestrian access being over a field and the unreasonable distance involved in such a convoluted route.
- The lack of footways on surrounding roads along with increased traffic will discourage pedestrian activity and cycling for both new and existing residents; specifically, the village's connection to PROW off Park Rd and Lower Rd, which enable access to assets including the Millennium Meadow and Grundisburgh Hall Park & Gardens.
- Paragraph 11.9 of the Local Plan states: *BFL 12* (the most recent nationally endorsed version) *will be used to inform the decision-making process to provide a design quality assessment against all major applications*. This scheme will perform badly against that assessment.
-

9) Policy SCLP11.2: Residential Amenity

- The development negatively impacts the outlook of existing residents (See **Appendix C** Landscape Assessment')

- The access arrangements and layout of the site do not lend themselves well to the site being integrated into the wider village, complicating matters relating to safety and security as well as general community cohesion which is a key feature of Grundisburgh.

10) Policy SCLP11.8: Parks and Gardens of Historic or Landscape Interest

- The proposal negatively impacts the Non-Designated Heritage Asset of Grundisburgh Hall Park & Garden, the setting of a listed building, as it includes a widening of Park Rd that will, at minimum, require loss of veteran hedgerows and trees (the proposed, yet still sub-standard, road surface will extend beyond the centre line of hedgerows and approaches to within 6' of tree trunks - both terminal effects).
- The loss of the trees will also adversely affect the setting of the Listed Grundisburgh Hall.

11) Policy SCLP12.51: Land to the West of Chapel Road, Grundisburgh

As shown on the Policies Map, this is identified for the development of approximately 70 dwellings. The proposals are for 80 which is not in line with the policy. The planning officer considered this difference to be significant at the pre-application stage and the impact of 10 additional dwellings compounds the problems listed elsewhere in this objection.

b) Affordable housing to be provided on site;

- The Heads of Terms indicate that unless a Housing Association buys the Affordable Housing they will revert to open market dwellings. This is contrary to policy; there are many ways of providing Affordable Housing that are not reliant on Housing Associations.

d) Provision of pedestrian access and footways to support access to services and facilities in the village;

- The proposal does not include any suitable pedestrian access nor footways as demanded by the policy to support access to services and facilities in the village. In his final report the Inspector made it clear in para 165: *The Policy should be amended to make clear that the provision of safe and suitable pedestrian access to services and facilities in the village is required so as to be consistent with national policy*
- Paragraph 12.558 of the Local Plan states: *'Vehicle access to the site is expected to be onto Park Road, and safe pedestrian access will need to be provided.'* This proposal does not achieve this provision.
- The design is not sympathetic to Grundisburgh Hall Park & Garden (see note 10 above).

f) A site-specific Flood Risk Assessment:

- The Head of Terms do not include for any long-term management of the surface water drainage system or quality control of the development.

g) An ecological survey will be required, along with any identified mitigation measures.

- See comments on Biodiversity and Geodiversity (section 5) and the Habitat Regulations.

There is no mention within the specific policy as to where the access point to the site should be. In his final report the Inspector made it clear in para 164: *The allocation site should be amended so that vehicular access can be taken off Park Road to the south, where sufficient width of public highway should allow safe and suitable vehicular access to be achieved.*

The only reasoning put forward for moving the access to Park Road/Lower Road is in the Ingent Technical Note commissioned by Hopkins Homes which formed the basis of the Statement of Common Ground between East Suffolk Council (the Local Planning Authority), Hopkins & Moore Ltd (the Site Promoter), and Suffolk County Council (the Highway Authority):

As access from Chapel Road is considered unlikely to be acceptable, access from Park Road has also been considered.

Although there is considerable vertical variation across the southern boundary with Park Road falling steeply from west to east, it is considered that a suitable location in terms of visibility would be possible.

Although Park Road is below standard in width at around 4.0m – 5.0m, there is understood to be scope to widen the road in areas and form suitable passing sections.

Conclusion

We would have concerns with delivering a suitable access to this site due to the nature of Chapel Road/Meeting Lane along the desire line between the site and the village center.

Park Road and Lower Road present more suitable routes of access to the site. Limited improvements to Park Road would appear achievable subject to clearance within the highway boundary.

In the Statement of Common Ground between East Suffolk Council (the Local Planning Authority), Hopkins & Moore Ltd (the Site Promoter), and Suffolk County Council (the Highway Authority), it is stated that:

The site Promoter and the Local Planning Authority agree that the site allocation boundary should be extended to Park Road to the south in order to provide a suitable and safe vehicular access point.

Nowhere in the technical note from Ingent is the word 'safe' used.

'Safe' is just a word used by The Promoter and repeated by the Local Planning Authority.

Hopkins Homes understands the minimum required standards needed to satisfy Highways regulations and guidelines within their application site proposing provision of 5.5m width roadways with 1.8m footpaths. The same width roadways are required on the access roads to the site, Lower Road and Park Road for all dwellings immediately affected by the increased traffic volumes.

See Appendices A & B.

Habitat Regulations

There is no indication in the Head of Terms that a financial contribution would be paid to the Suffolk Coastal RAMS. The Ecological Appraisal concludes that even by providing internal footpaths and contributing to the RAMS it is:

'unlikely that any such designation in the surrounding area will be significantly affected by the proposals.'

As in this case where the potential for likely significant effects cannot be excluded, the competent authority must make an appropriate assessment of the implications of the plan for that site, in view of the site's conservation objectives. The competent authority may agree to the plan only after having ruled out adverse effects on the integrity of the habitats site. Where an adverse effect on the site's integrity cannot be ruled out, and where there are no alternative solutions, the plan can only proceed if there are imperative reasons of over-riding public interest and if the necessary compensatory measures can be secured.

As the proposal stands it must be refused to comply with the Habitats Regulations. It is clear that the applicant's own information concludes that even with mitigation the chances of a significant impact are 'unlikely' rather than being ruled out.

The design of the layout together with its positioning has been shown to reduce opportunities for dog walking and recreation rather than increase them to mitigate the impact on the RAMS.

There are no reasons of over-riding public interest to conclude that the noted impacts should be allowed.

Conclusion

The proposals are contrary to Development Plan Policies and there are no material considerations that would override the policy objections.

The proposals fail to comply with the Habitat Regulations and if approved would be unlawful.

Grundisburgh and Culpho Parish Council, on behalf of the community of Grundisburgh, ask you to listen to all the voices that are saying Chapel Field is the wrong place to build 70/80 dwellings; it does not meet a NEED.

Our community expects the Local Planning Authority to refuse the planning applications as submitted.



Parish Council response:
Appendix B

TRANSPORT ASSESSMENT

80 Dwellings on Land West of Chapel Road, Grundisburgh

Prepared for: Planning Applications DC/20/3362/FUL & DC/20/3284/FUL

Prepared by: Grundisburgh & Culpho Parish Council

26 September 2020

1. INTRODUCTION

- 1.1. As part of a planning application for the construction of 80 dwellings on land west of Chapel Road (Chapel Field) the developers, Hopkins Homes, commissioned a Transport Assessment (TA) which was conducted by Cannon Consulting Engineers (Cannon).
- 1.2. Although the TA provides a fairly comprehensive account of most of the factors requiring examination, once it was established how the matters of most concern to our village had (or rather hadn't) been investigated and addressed, it became clear that we could not allow this TA to be the final word on matters of highways design and, most importantly, safety.
- 1.3. This document has been produced in order to supplement the TA by highlighting what we perceive to be fundamental flaws and providing some alternative analysis of the data provided by Cannon.
- 1.4. Specifically, we find that the TA:
 - i) **is missing critical road traffic data**
 - ii) **contains questionable analysis** of the road traffic data that it does provide
 - iii) **does not assess the current or future highway conditions for pedestrians** on Park Road or Lower Road
 - iv) **mischaracterises the accident data available** and the impact of narrow roads on accident likelihood and severity
 - v) is not clear on the achievability of appropriate visibility splays, and therefore the **safety of main road junctions** needed to access the site
 - vi) does not detail the **specifications nor deliverability of footpath upgrades** needed for connectivity to the village
 - vii) fails to address the fact that the proposed road widening will **impact the setting of Grundisburgh Hall Park & Gardens**

2. REFERENCE MATERIALS

- Transport Assessment, Cannon Consulting Engineers, Aug 2020
- Highways Design Guide, Suffolk County Council, 2000
- National Planning Policy Framework, Ministry of Housing, Communities & Local Government, Feb 2019
- Adopted Local Plan, East Suffolk District Council, Sept 2020
- Planning Inspectors Report, Mr Philip Lewis, Sept 2020
- Pedestrian Safety Report, World Health Organisation, May 2013
- Statement of Common Ground (SoCG) between Hopkins Homes, Suffolk County Council (SCC) and East Suffolk Council (ESDC), Oct 2019
- Response to Planning Inspector's Report, Grundisburgh & Culpho Parish Council, Sept 2020

2.1. Neither the SoCG nor the TA details any alternative highway specifications to be delivered in the planning application so we have assumed that Suffolk Highways Design Guide standards are to be applied to both roads and footways thus ensuring the required levels of practicality and safety are met and NPPF policy is delivered.

3. OBSERVATIONS

3.1. The TA is missing critical road traffic data

3.1.1. The TA is missing ATC data for Park Road, the proposed primary access road that is also identified as needing to be widened.

3.1.2. Since Park Road is not merely the access road for the development, but is also residential with direct access to dwellings, we need to properly understand the current conditions on this road to establish the cumulative impact of development and therefore the suitability of the proposed highway improvements. Traffic volumes and speeds are critical elements of those current conditions.



Fig.1 View West on Park Road as LCV passes parked car

3.2. The TA does not assess the current or future highway conditions for pedestrians on Park Road or Lower Road

3.2.1. Key conditions of the National Planning Policy Framework (NPPF) are that *“Safe and suitable access can be achieved for all users”* and *“...development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*

3.2.2. The Adopted East Suffolk Local Plan states that development will be supported when “It is well integrated into, protects and enhances the existing pedestrian routes and the public rights of way network” and “...proposals will be expected to prioritise safe and convenient pedestrian and cycle movement”

3.2.3. To achieve these policy objectives, surely one has to first assess the current conditions for all users impacted by any development as well as examine the resulting conditions? We would have welcomed Cannon’s expert view on the current conditions for pedestrians along Lower Road and Park Road as that has been the primary concern of local objections, so we are puzzled that Cannon have focused solely on conditions for motorists.



Fig.2 View west along Lower Road towards junction with Park Road. Note road width of just 2.7-3.5m

3.2.4. Use of the surrounding lanes by pedestrians is for both basic amenity (resident access to village services) and for access to the PROW network in the south, including routes through the recognised assets of Millennium Meadow and Grundisburgh Hall Park & Gardens. Additionally, the junction of Lower Road and the B1079 is a drop-off point for children on the Farlingaye School bus from where children have to use the country lanes to get home on foot.

| | Lower Road (Current & Proposed) | Park Road (Current) | Park Road (Proposed) | On-site (Proposed) | Suffolk Design Guide Standard* ('Safe and Suitable'?) |
|---------------------------------|------------------------------------|----------------------------------|-------------------------|-----------------------|---|
| Carriageway width | Min 2.7m Max 4.6m Avg 3.7m | Min 3.0m Max 4.9m Avg 3.9m | 4.8m | 5.5m | 5.5m |
| Footways | None | None | None | 1.8m | 1.8m |
| Current/Target Maximum Speed | 29mph | Unknown | Unknown | 20mph | 20mph |

Table 1. Specifications of highways impacted by the proposal. * refers to Design Guide para 6.2.1 'Minor Access Road'

3.2.5. Since table 1 shows Lower Road is severely restricted in terms of its narrow width, lack of footways, more than 60 vehicle movements per hour and 85th percentile speeds as high as 29mph, what residents are saying about the current risks to pedestrians seems to be supported by data. When you then consider the current Suffolk Highways Design Guide standards it is clear that residents of both Lower Road (and also, one can safely assume, Park Road) are living with road conditions an order of magnitude below current design standards even now, before any development.

3.2.6. Although measured improvements along Lower Road to mitigate these risks would be most welcome in the event of increased traffic volume, we are not aware of any practical improvements that could be made, and as such Lower Road arguably needs the most consideration in relation to this planning application. We would not, for instance, endorse the imposition of physical traffic calming or something even more heavy-handed like a one-way system to enable this development

to go ahead, on account of the disproportionate loss of amenity that Lower Road residents would feel as compared to everyone else and potential increases in road speeds.

3.2.7. Furthermore, the proposed improvements to Park Road fail to meet Design Guide standards as they only involve widening the carriageway to 4.8m, with no provision of a dedicated footway for pedestrians. Shared roads that are too narrow bring pedestrians and motorists into direct conflict, but according to the World Health Organisation in their Pedestrian Safety Report: *“Road widening increases pedestrian injury risk. Wider lanes and roads, and higher design speed tend to increase motor vehicle traffic speed, which increases pedestrian risk”*.

3.2.8. We are concerned that widening Park Road without provision of dedicated footways could actually increase the risks to pedestrians, and we would welcome the input of SCC Highways on this important matter.

3.2.9. Although a secondary factor, it is also necessary to point out that on narrow lanes such as these, increases in traffic volumes have a disproportionately negative impact on traffic flow. With cars having to stop and sometimes even reverse to enable passing, having more vehicles appear in front and behind can have a compounding effect (ie ‘gridlock’). This factor is neither highlighted nor addressed by the TA in terms of effective flow or safety and we feel needs to be considered.

3.2.10. In summary, we do not understand what objective criteria Cannon have used to determine that the impact of the development is not ‘severe’ as per NPPF requirements (especially with regards to pedestrian safety). Nor are we satisfied that ‘safe and suitable access’ has been achieved for all users when the proposals fail to meet any agreed highways design standards and Cannon concede that traffic volumes on access roads will increase by at least 30%. Such increases constitute a material change to conditions for existing residents and should not be ignored.

3.3. The TA mischaracterises the accident data available and the impact of narrow roads on accident likelihood and severity



Fig.3 View east on Lower Rd, just before the infamous dogleg. Note lack of space for widening/footways



Fig.4 View West on Park Rd. Note limited space for passing despite parking on the verge

- 3.3.1. There are a number of road traffic accidents detailed in the TA which resulted in casualties. Two specifically relate to vehicles using the access roads impacted by the proposed development. In their assessment, Cannon say: *“Whilst all accidents are regrettable it is not considered that these represent an accident pattern that is indicative of an issue with the highway layout or the volume of traffic”*.
- 3.3.2. We agree with the latter point regarding traffic volume, but disagree strongly with the former point about highway layout. It is commonly understood that narrow roads do not cause accidents in and of themselves, but they do reduce the ‘margin for error’ allowed by the conditions before a collision occurs. This is even more important a consideration when pedestrians share the road surface.
- 3.3.3. The TA also notes *“It is understood that there is a lot of concern locally regarding safety on the existing highway network. Whilst this is not reflected in the PIA data, the proposal will include a review of possible local highway safety improvements”*.
- 3.3.4. When you consider that the roads in question have only around 25 dwellings at present, the presence of two accidents where injuries were sustained in the space of just 5 years is a significant red flag, particularly when you are looking to add another 80 dwellings.
- 3.3.5. We consider that the concerns of local people regarding the safety of the road network are reflected fairly in the accident data and any proposed increases to traffic volumes without suitable improvements will in all likelihood lead to a commensurate increase in accidents. As such, we do not believe that the proposal *‘protects and enhances the existing pedestrian routes and the public rights of way network’* as required by Local Plan policy.
- 3.4. The TA is not clear on the achievability of appropriate visibility splays, and therefore the safety of main road junctions needed to access the site**



Fig.5 View north from junction of Lower Road and B1079. Note vegetation obstructing visibility and the gradual bend to the left

- 3.4.1. If we examine ‘Drawing 1812-296-008A Ipswich Road/Park Road Junction’ and ‘Drawing 1812-296-009 B1079 Lower Road Junction’ the visibility splays detailed appear to track through mature vegetation outside of the highway boundary, and as such would not deliver the required visibility at any time of year, much less after periods of unmanaged hedgerow growth. We request that suitably qualified highways officers provide an independent assessment of these proposals including a site visit to ensure they are sufficient and deliverable.



Fig.6 View south from junction of Park Rd. and Ipswich Rd. Note permanent vegetation blocking views round the bend

- 3.4.2. The road traffic data demonstrating that these junctions are unsafe at present due to excess speed is a most welcome disclosure and we fully support any reasonable road improvements that could increase safety in these areas.

3.5. The TA does not detail the specifications or deliverability of footpath upgrades needed for connectivity to the village

- 3.5.1. Safe and suitable connectivity to the wider village is an extremely important factor for consideration, especially given the Local Plan policy for this site allocation includes the requirement for housing suitable for older people and families with children.
- 3.5.2. According to the TA *“The routes identified above are considered to be the ‘primary routes’ for walking and cycling from the new development”* and *“It is proposed to improved (sic) PROW FP20 and provide a metalled surface that can be used by future and existing residents all year round”*
- 3.5.3. We are disappointed that there are are no useful details, drawings or specifications about the proposed footway connection with and along Footpath 20 at the northern fringe of the site as it proceeds west to Ipswich Road. The route needs to safely accommodate pedestrians, wheelchair users and cyclists and in all weathers. At a minimum this would require details of the specific layout, dimensions and proposed surface materials, but nothing of substance is provided in the TA, nor can we see anywhere else in the planning applications.
- 3.5.4. We understand that SCC have statutory powers to approve modifications to PROWs where there is a public interest or safety issue, but does the PROW mentioned have sufficient footprint to accommodate the necessary improvements? Would such modifications garner local support? As a

Parish Council we need to be provided with much more information on this critical matter before we could support changes to a footpath, especially as such modifications impact third party land owners and trustees.

3.5.5. Additionally, we note the desire line for the site to the village centre is most likely Meeting Lane, which although narrow and without footways for much of its length, is up to 600m shorter than the proposed route to the village centre. We are keen to understand the views of ESDC and SCC Highways in this regard and why improvements are not being proposed along this route instead of, or supplementary to Footpath 20 to promote higher standards of connectivity with the wider village.

3.6. The TA fails to address the fact that the proposed road widening will impact the setting of Grundisburgh Hall Park & Gardens

3.6.1. We are grateful for the detail provided about the locations and degree of widening proposed to Park Road, and whilst we do not agree that this alone would provide sufficiently *'safe and suitable access for all users'*, what we also need to highlight is a matter of conflict with the Adopted Local Plan policy condition *"Design and layout of the development to be sympathetic to the setting of Grundisburgh Hall Park historic park and garden"*.

3.6.2. In examining 'Drawing 1812-293-279B S278 Road Widening' it is clear that widening work, even to deliver just 4.8m wide carriageways, will severely encroach on veteran parkland trees and hedgerows, whether to their above ground form or their root systems. In our experience, such disturbance to roots is likely to impact the stability and safety of trees and the removal of hedgerows would have an immediate and material effect on the setting of the park and gardens.

3.6.3. Whilst we are not sure it is the domain of the Transport Assessment to examine trees, it is incumbent upon the developer to examine the actual deliverability of proposed improvements within any agreed policy frameworks. As Cannon have failed to point out this potential issue as identifiable from their own drawings, we thought it particularly important to do so.

4. SUMMARY

4.1. The Parish Council considers that the shortcomings detailed in this response demonstrate that the planning application fails to meet the requirements of both the NPPF and the Local Plan, and as such **we object to the application** as it stands.

4.2. Moreover, we believe now more than ever that this site allocation in the Local Plan was a grave error as there seems little hope of delivering the policy in full without compromising long-established highway standards and planning norms.

4.3. This is particularly frustrating due to the fact that all of the issues raised within this response were anticipated throughout the Local Plan consultation process, and highlighted in huge numbers of representations to both ESDC and the Planning Inspector. We hope that future dialogue on this and related matters is conducted in better accord to minimise the time and energy expended by all.

Planning Application References:

Parish response to:

Landscape & Visual Impact Assessment

Chapel Field, Grundisburgh

From their desks near Banbury, 139 miles away, Aspect Landscape Planning Ltd., on behalf of Hopkins Homes, have produced a Landscape and Visual Impact Assessment of Chapel Field as part of a full planning application (detailed above) for 80 new dwellings.

Unsurprisingly, through a mixture of jargon and indecipherable ratings they assess that the loss of Chapel Field to housing would be inconsequential and that the development proposals put forward by Hopkins would actually enhance the area, rather than ruin it.

This document serves as a counter to that assessment, in order to provide some balance to the argument through images, local insight and personal testimony about the value of this site, even as it presently sits bare after harvest.

DC/20/3362/FUL & DC/20/3284/FUL

Appendix C



Fig.1 View over Chapel Field from its north-east corner

Sources referenced:

1. Landscape and Visual Impact Assessment, Aspect Landscape Planning Ltd (Aug 2020)
2. Settlement Sensitivity Assessment Volume 2, Alison Farmer Associates (2018)
3. Landscape Character Assessment, Suffolk County Council (Current edition)

The Landscape of Today

Nowadays, Chapel Field represents both walkers' or motorists' first exposure to historic countryside south of Grundisburgh.

As can be see from fig 2. there has been significant development of Grundisburgh since 1905 and, despite applications to extend development even further south dating from at least 1962, the settlement boundary was set at Footpath 20 (the northern boundary of Chapel Field) that is, until now.

In trying to understand the landscape character of Chapel Field, Aspect would have you look *inwards* to the village for its context and setting but this is **not** how we see it locally.

Although the neighbouring Post Mill and Alice Driver developments provide comfortable homes and welcoming communities, no-one believes that in their layout and design they represent the historic character of Grundisburgh, nor do they think it is fair to use their presence as justification for further vast expansions into the countryside.

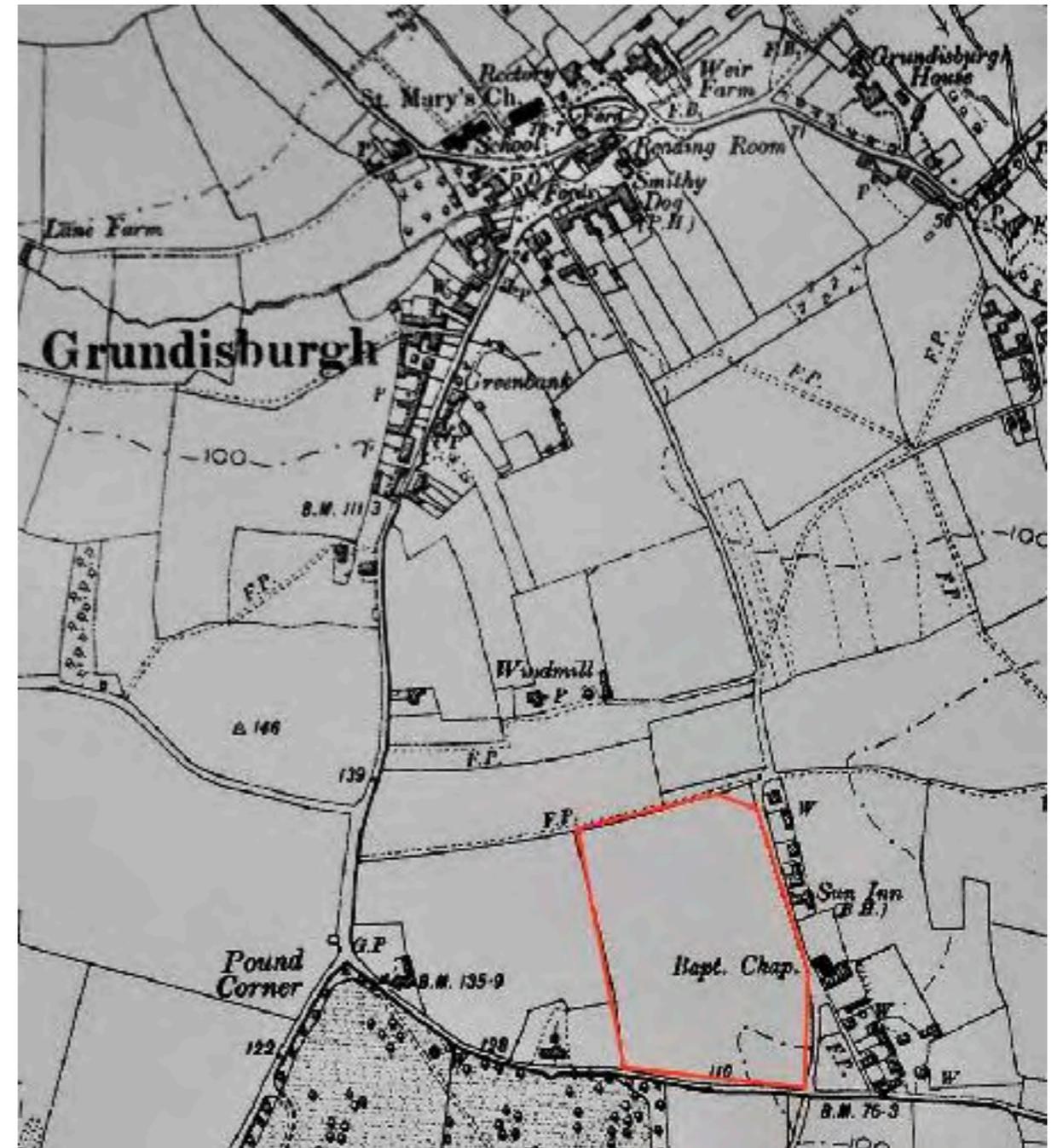


Fig.2 Map of Grundisburgh from 1905; Chapel Field highlighted in red



Fig.3 Aerial view showing how Chapel Field relates to the countryside to the south (courtesy of Google Earth)

Chapel Field offers access to the sights and sounds of the countryside for those not able to walk very far, and a gentle, history-rich transition into open spaces for those of us able to travel beyond the village fringe into the fields and woodlands beyond.

For the true context and setting of Chapel Field, one should, as fig. 2 shows, look *outwards* to the clusters of houses, country lanes, hedgelines and woodlands in the direction of Grundisburgh Hall and Great Bealings.

Aspect judge that this site has the lowest possible 'susceptibility to development' that their scale allows ('Low') as it suffers from the 'urbanising influence' of the village edge, the 222-year old Chapel and the scattering of ~200-year old cottages to the east.

I ask the reader to judge for themselves whether this appears to be an 'urbanised' site and whether it would be no more susceptible to development than a derelict brownfield site or some other location that would also be rated as 'Low'.

The majority of the site is identified as ‘Ancient rolling farmlands’ in the SCC Landscape Character Assessment and this landscape type is typified by, amongst other features:

- *Rolling arable landscape of chalky clays and loams*
- *Field pattern of ancient random enclosure. Regular fields associated with areas of heathland enclosure*
- *Hedges of hawthorn and elm with oak, ash and field maple as hedgerow trees*
- *Scattered with **ancient woodland** parcels containing a mix of oak, lime, cherry, hazel, hornbeam, ash and holly*
- *Network of winding lanes and paths, often associated with hedges, create visual intimacy*
- *Dispersed settlement pattern of loosely clustered villages, hamlets and isolated farmsteads of mediaeval origin*

As is demonstrated in the images included in this response, Chapel Field typifies this landscape type and, but not for its proximity to the current village edge, would have proven much more difficult for Aspect to disparage as an ‘urbanised’, ‘low value landscape’. The enclosed ‘intimate’ areas are actually a characteristic feature for the area which planning policy indicates should be protected rather than exploited.

Other landscapes might offer more drama, scale and even tranquility, they are also more remote. Due to Chapel Field’s proximity, accessibility and distinctive setting (being overlooked by an historic place of worship) many more people observe and cherish this landscape on a daily basis than other, arguably more striking, locations. Indeed, from most of the houses along Chapel Road, successive residents have been enjoying this very landscape for over two hundred years in much the same form as now.

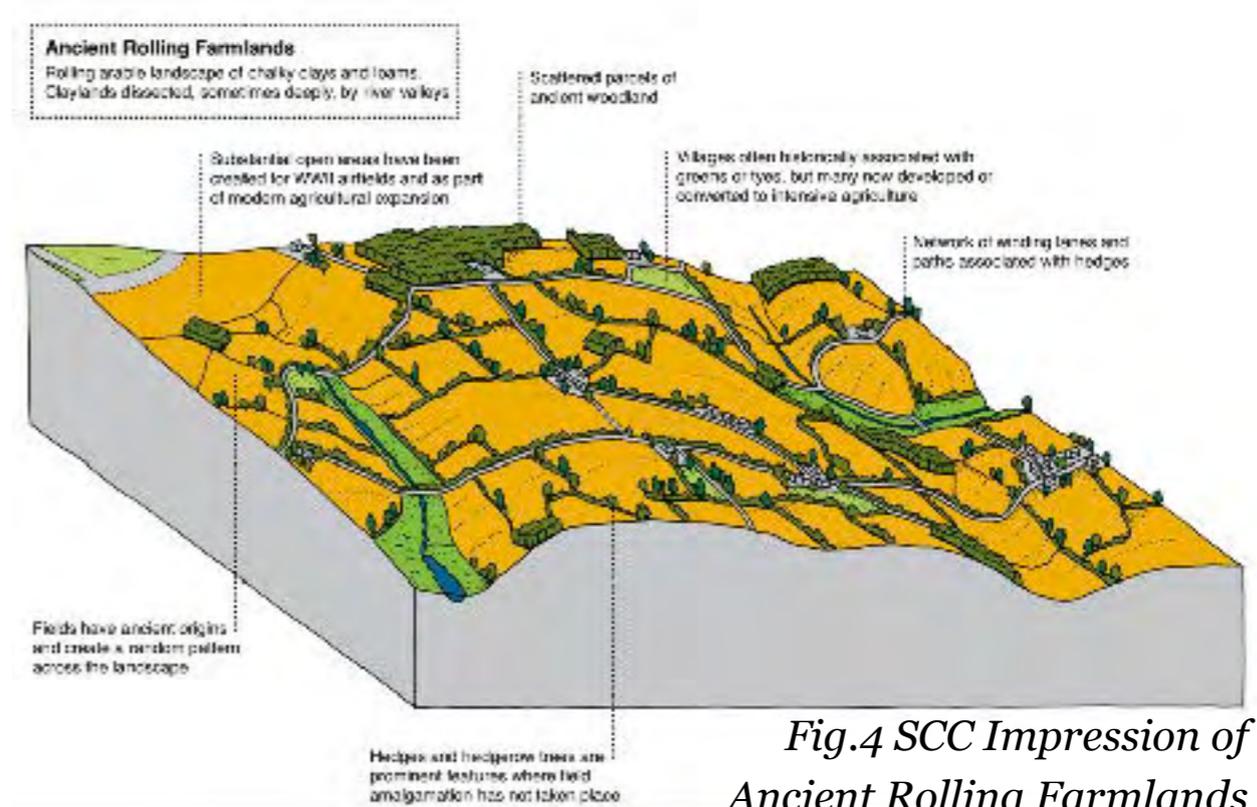


Fig.4 SCC Impression of Ancient Rolling Farmlands



Fig.5 View down Park Road onto southern boundary of Chapel Field



Fig.6 View across Chapel Field from north-west corner

Although I agree with Aspect's judgement that the SCC Character Assessment is somewhat generic, the Settlement Sensitivity Assessment carried out by Alison Farmer Associates, however, is much more specific about Chapel Field going so far as to suggest opportunities to enhance the specific setting and restore some likely historical landscape features. The location is described as part of 'Peripheral Area: GR3' and in that section the authors state this (emphasis mine):

*'.....More broadly the well wooded character of this landscape makes it less visually sensitive to new residential development **however** the landform slopes away from the settlement edge and is perceived as part of the wider setting to Grundisburgh parkland and the Fynn Valley. This landscape **is therefore sensitive to development** which appears to extend into the wider landscape.'*

*'The sensitivity of this area lies in its **well wooded**, rural **rolling farmland** and parkland that slope **away from the village edge** and into the Fynn Valley to the southeast. Its value lies in its role as a **distinctive** and **high quality setting** to both the settlement and Grundisburgh Hall parkland.'*

*'...**one plot deep linear development** along lanes where dwellings have direct visual relationship over adjacent land but feel divorced from the main setting and are seen in a **rural context**. Dispersed properties along lanes adds **complexity to pattern**.'*

*'Rural village edge feel, **few detracting features**. Network of very **narrow lanes are key** to the character of the village.'*

With opportunities detailed as:

*'Opportunities to plant and manage **roadside trees/hedge along Chapel Road**. Provide stronger village edge **against rear of Post Mill Gardens**.'*



Fig.7 View across Chapel Field from the south-west, detailing the opportunities cited in the Alison Farmer report

Despite the specific references to the site within it, Aspect claim the Alison Farmer report should be discounted as too much of a 'broad brush' review, in favour of their own, paid-for assessment. No doubt this is due to the favour the Alison Farmer report shows the area, the sensitivity to development and the character that it describes and the value we should place on such landscapes. Since the Alison Farmer report was also prepared completely impartially I feel it can be trusted to a far greater extent than anything commissioned by a developer.

For local people, Chapel Field occupies a central position in a chain of miniature landscapes on routes running both east to west and north to south. Particularly, all pedestrian movements to the south, either to houses on the village fringe or countryside beyond, have to follow Chapel Road. As such this area is valued deeply for its uncomplicated open views as well as a place to occasionally spot wildlife such as foraging muntjac, soaring buzzards and bounding stoats.



Fig.8 Meeting Lane, emerging onto north-east corner of Chapel Field

The Impact of this Proposal

This is a fairly simple thing to assess; in the words of one respondent to the planning application

'this is a short term business opportunity for the developer, but a life sentence for locals'

Filling Chapel Field with an enclosed, inward-looking block of housing not only robs the surrounding residents of their connection to the countryside that has existed for over 200 years, but also with the layout of the proposed scheme, new residents are also denied any such connection. Aspect even seem proud to state that the new development would be 'enclosed' ie. hidden when in fact a defining characteristic of Grundisburgh's fringe are dwellings with *'direct visual relationship over adjacent land'*.

As has been shown with the aerial shots as well as those from the ground, this is a landscape which needs to retain its complexity, its scattered nature and intimate views. The proposed development will awkwardly impose itself right into the centre of a patchwork of otherwise attractive but compact landscapes on the village fringe, interrupting their continuity and in doing so adding to the deficit of character that Grundisburgh is slowly developing when looking at its housing stock as a whole and its relation to the landscape.

The developers need to be much more restrained, respectful and creative to make any development of this site a success.



Fig.9 Juvenile oak tree earmarked for removal to enable access and road widening



Fig.10 View from South West corner of Chapel Field into Grundisburgh Hall Park, showing the hedgerow likely to be impacted by road widening to allow access to the proposed development



Fig.11 View from Park Road up the slope to the Baptist Chapel, built in 1798

Fig.12 Ancient hedgerow along Park Road, currently earmarked for reduction to allow for road widening





Fig.13 View of the treeline on the eastern boundary of Chapel Field for which tree preservation orders have been requested, without even so much as a response from the district council after over two months, and despite chases

Fig.14 Virtual aerial view courtesy of Google Earth, which demonstrates how much encroachment into the countryside that this block of development would deliver

