

Grundisburgh and Culpho Parish Council

John Ager

8 Post Mill Close

Grundisburgh

IP13 6UU

25th June 2021

**Re: Planning Applications DC/20/3362/FUL and DC/20/3284/FUL**

**Land to West of Chapel Road**

To members of East Suffolk Council Planning Committee South

Dear Councillor

It is with some hesitancy that we write to you, but we feel so strongly about the above planning applications and the dangerous precedent they could set if approved, that we had no choice but to reach out in the hope that as you discharge your duties as a member of the Planning Committee you may lend a sympathetic ear to a very distressed and upset parish and take more into account than we could possibly put across in the three minutes we have allocated. We also hope to show that there are numerous grounds on which to base a robust and defensible refusal of permission, in contrast to the views of the Local Highway Authority in particular.

We are very proud to represent our village; it is a wonderful place with a rich history and strong community spirit that has seen its population swell greatly over recent years through well-placed, larger, housing schemes and a significant number of windfall sites. Grundisburgh has always welcomed thoughtful development but as you may be aware, over 1000 objections have been received by East Suffolk Council in relation to the above applications. Amongst a wide variety of reasons put forth, the primary concern of almost all residents are the dangers to pedestrians and motorists alike posed by the huge increase in traffic volumes along historic lanes whose design and layout date back to the time of horse and cart.

Lower Road is proposed as a primary access road but has no footways, carriageway widths of between only 2.7m and 3.7m, on-street parking and an S-bend with insufficient visibility or width to allow for even 2 small cars to pass without one having to reverse. The informal passing places referenced in the case officer's report are actually resident's private driveways and are, on their face, inappropriate for consideration as an aid to traffic flow but are also insufficient for allowing any more than one car to pass another at a time. Because of the limited dimensions of the lane and poor visibility, Lower Road's junctions have already seen a number of serious car accidents in recent years with injuries involved. More traffic will undoubtedly mean more accidents.

Park Road is the other primary access, has carriageway widths of between 3m and 4.9m, but an average width well short of that needed to allow two cars to pass at normal speed. Not all properties have

driveways, resulting in on-street parking narrowing the lane even further. Although limited road widening is proposed, the plans do not take into account the change of level from the elevated carriageway and the lower level of the land at Grundisburgh Hall Historic Park - which could result in the loss of trees and hedges to provide slab revetment support for the bank. Don't just take our word on this; it was the verdict of the applicant's own civil engineers during the Local Plan examination, but sadly those drawings were withheld at the time and have been suppressed since (see later for detail).

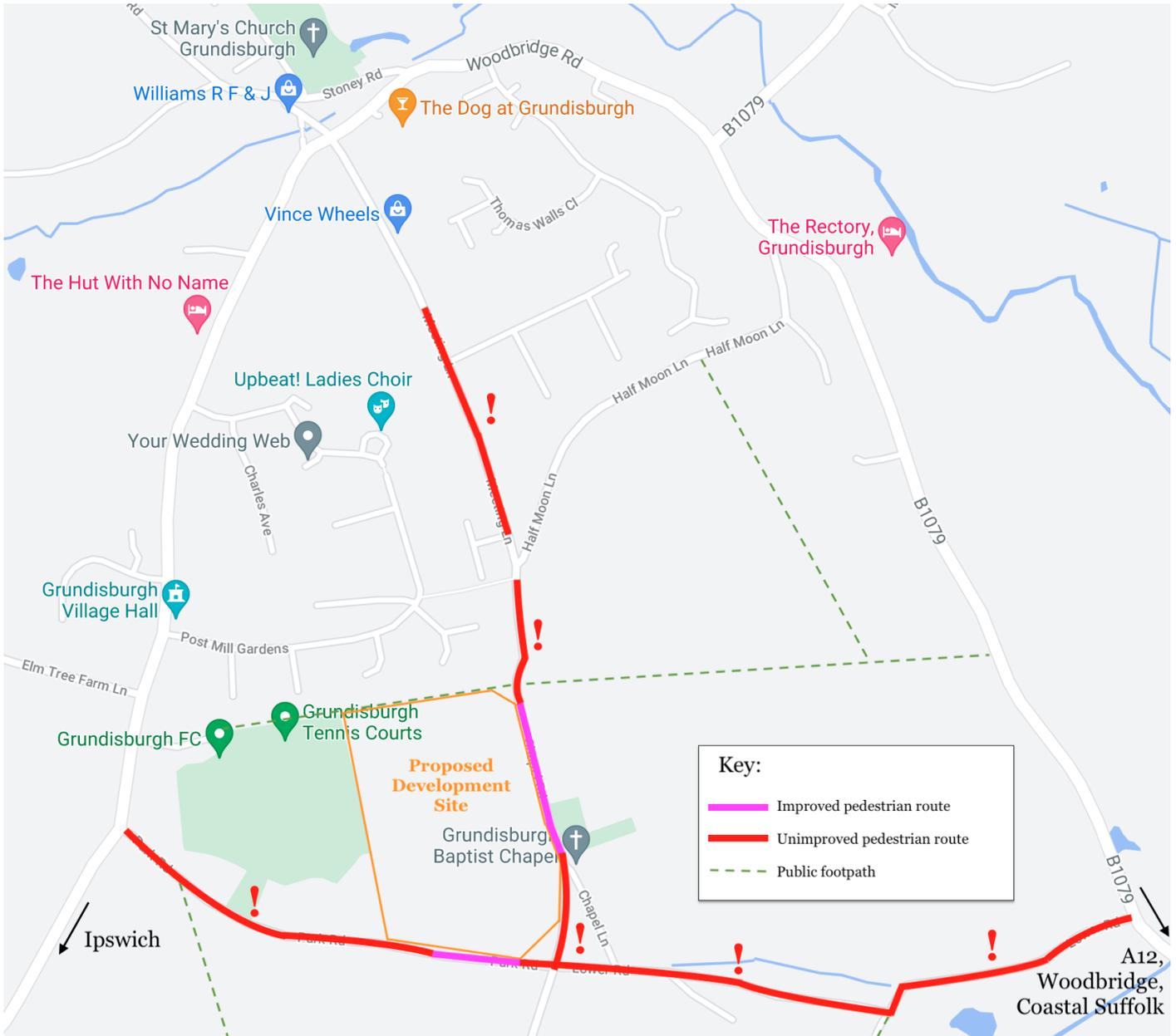
As with Lower Road, there are no footways or provision for pedestrians to enter or leave properties on Park Road or to reach the bus stop at Park Road/Ipswich Road without having to walk in the road.

Chapel Road/Meeting Lane is the direct access, the desire line, to the village centre. This lane was rejected as an access to the site by the Planning Inspector during the Local Plan examination because it is too narrow with no continuous footway. But it will undoubtedly be used, as it is now, as the direct access to the village centre, primary school, playgroup, shop, pub and church as it is some 500m shorter than the proposed pedestrian access.

This development will increase conflict on these narrow lanes between pedestrians, those in wheelchairs, cyclists, equestrians and those in cars, emergency vehicles, farm vehicles and delivery vehicles. We anticipate that pedestrians could be deterred from using these routes (currently in the process of being designated 'quiet lanes' by the County Council) altogether and would resort to driving the short distance into the village thus adding even more to congestion, harmful emissions, and parking problems in the historic village centre.

Highways have acknowledged these risks, and demanded companion footpaths along Chapel Road and the eastern section of Park Road. But why not on the adjoining western section of Park Road, Lower Road and Meeting Lane where both new and existing residents will arguably face a far greater risk by

walking in the road? We simply do not understand how this verdict was reached, particularly when you



look at the map below which shows how limited the footway improvements are:

Much seems to rest on the trip rates in the applicant's Transport Assessment which did not use the industry-standard TRICS method and we feel have seriously underestimated the volume of traffic that will be generated by the development. We do not believe that 70 homes, with parking provision for over 200 vehicles will only generate 47 return car journeys per day. Using TRICS we would see an estimate 4-5 times higher which would equate to an 80-100% increase in traffic volumes per day, not the 20% often quoted. Furthermore the original traffic surveys were undertaken during the COVID lockdown and are therefore unrepresentative of the reality. GCPC strongly recommend that the Council commissions a truly independent highway assessment before making a decision on this application, if only to be certain about such an important issue as road safety where a mistake could mean serious injury or death.

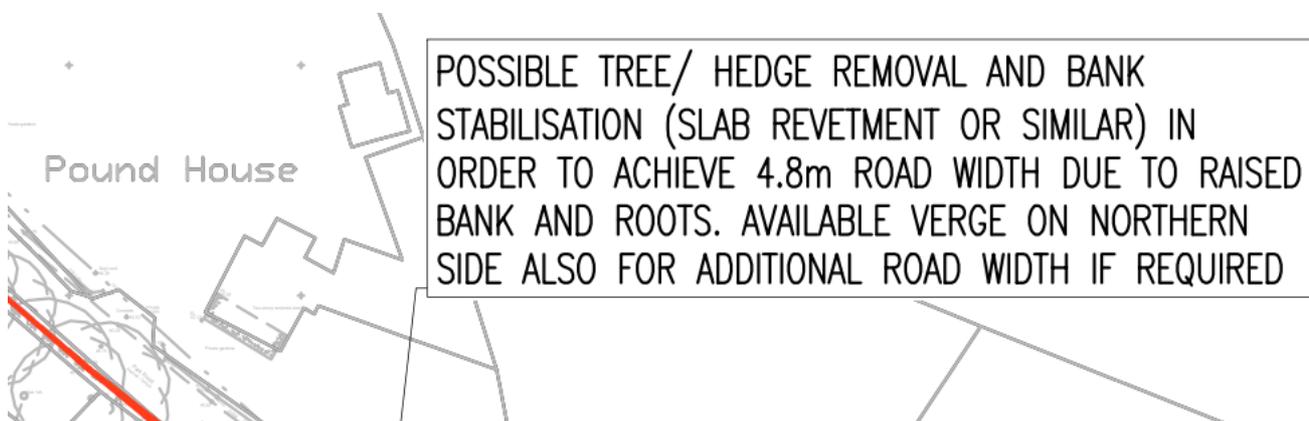
Of significant concern to us was Highways' statement in answer to a question posed for GCPC by County Councillor Elaine Bryce "*that in this case, whilst we do not necessarily support the provision of development of this scale in this location, subject to the required mitigation measures, there is not sufficient evidence to enable us to uphold an objection in the planning process, particularly as the site is allocated within the current Local Plan.*"

**We disagree strongly with Highways' assessment, and are confident that a review of the true highway conditions on all impacted lanes (and using accurate traffic forecasts) would demonstrate an unacceptable impact to road safety from the proposals, quite irrespective of the site's allocation in the Local Plan.**

On this subject, how this site came to be allocated within the Local Plan formed the basis of a complaint reference CCCT278612462 to ESDC and SCC. Following a Freedom of Information request GCPC discovered new information that led us to believe that key detail was withheld from both the Planning Inspector and the general public by ESDC, SCC and the site promotor during the Local Plan Examination that may have had a material impact on the assessed deliverability of the site.

During the Local Plan examination, Ingent (a civil engineering company) in their technical note for the site proposer, dated July 7<sup>th</sup> 2019, gave detailed reasons why access to 'Land West of Chapel Road' was not possible via Chapel Road / Meeting Lane, stating that: "*Park Road and Lower Road present more suitable routes for access to the site. Limited improvements to Park Road would appear achievable subject to clearance within the highway boundary*".

After the Planning Inspector had determined that Chapel Road and Meeting Lane were unsuitable for access to the site, and therefore found Policy SCLP12.52 unsound, for him to make a proper assessment about the site's deliverability the further detail produced by Ingent in Plan 1812-296-001C (excerpt below) would have clarified his assessment, but this information was deliberately withheld from his scrutiny with the agreement of ESC, Suffolk County Council and the site promoter. Although this information would have undoubtedly also been useful in this planning application, it has not resurfaced



despite the trees and hedgerows of Park Road being a major point of contention.

To understand why this critical assessment came to be removed from subsequent versions of the technical drawing, one should refer to an email exchange between the site promoter and SCC dated 10th October 2019 which states: *“Please find attached an amended site access plan for Grundisburgh following further discussion with Andrea McMillan at East Suffolk. Andrea requested that the text boxes which referred to tree/hedge removal to be omitted as this is too much detail at this stage.”*

We argue that it should have been explained in the Statement of Common Ground (SoCG) that the only remaining option for *‘safe and suitable’* access, (Park Road and Lower Road), required improvements that were contingent on the removal of veteran trees and hedgerows from Grundisburgh Hall Park, a Non-Designated Heritage Asset specified by ESC. The Planning Inspector, in his final report, was anxious *“to safeguard the setting of the nearby Grundisburgh Hall Historic Park and Garden”*. GCPC cannot understand how East Suffolk can claim as part of their complaint response that *“it is not clear what benefit there would have been for the Inspector or for the public in the submission or publication of earlier, unagreed, drafts of the SoCG”*.

It is because the earlier plan 1812-296-001C contained the detail needed to make a decision, not the sanitised version ‘E’ that was included within the SoCG that ESC and SCC officers knew the removal of the trees and hedgerows from Grundisburgh Hall Park may be required, and it was they who withdrew version C from scrutiny.

SCC subsequently claimed in an email to GCPC chair Peter Kendall dated 24<sup>th</sup> December 2020 that: *“there is no evidence that information was consciously suppressed”* but we do have this information and felt compelled to make this information public. We raise this information again as there is a very real chance that **approval of these planning applications presents a very real possibility of liabilities** for SCC should the road widening not be carried out correctly by the applicant in an attempt to minimise the impact of the works.

We also wish to highlight one final issue which may be downplayed by the applicant during the forthcoming committee meeting and could take us too long to explain in that setting. This matter relates to the sole pedestrian link proposed to the wider village via Footpath 20 on the northern perimeter of the site.

Footpath 20 requires significant upgrades to suit the nature and scale of the development, but it runs through the rear gardens of the six bungalows on Post Mill Crescent. To date none of these landowners have been served notice by the Planning Authority or the applicant and all ferociously oppose works on their land outside of the defined limits of the footpath.

Although the applicant claims that SCC possess the statutory powers necessary to enforce the improvements this is far from resolved and will be subject to a very strong challenge, particularly as the applicant wishes to remove ornamental trees and hedges owned by the third party landowners. From

these gardens, the path continues westward across Grundisburgh Playing Field, to Ipswich Road. The playing field is owned by Fields in Trust who, incidentally, have also objected to the proposals.

We can confirm, contrary to claims by the applicant, that **at no point does Footpath 20 run through land under the control of the applicant, nor has it ever**. Nor do we believe that the footpath is immediately accessible from the site without first crossing a small sliver of third party land, rendering any improvements **undeliverable without the consent of the landowners**. We are aware that at least one of the Post Mill Crescent residents has presented their original 1960s title plan to ESDC as evidence of ownership, but are unsure if the Planning Committee will be made aware of this fact, so we thought apt to do so.

We understand that our highlighting these issues outside of the setting of the committee meeting is an unusual step, and we hope that you may forgive our intrusion. But we have a duty to represent our Parish to the fullest of our ability and given their passionate objection to these proposals we felt no option but to explore every avenue to help them, by raising awareness of important issues which may not be given proper consideration otherwise.

Yours sincerely,

Peter Kendal

Chair,

Grundisburgh & Culpho Parish Council

Ann Willetts

Vice Chair,

Grundisburgh & Culpho Parish Council

Below is a link to a short film

Produced by Summer Isles Films

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