

Grundisburgh & Culpho Parish Council Response to Planning Applications DC/20/3362/FUL and DC/20/3284/FUL

'70 Dwellings on Land West of Chapel Road Grundisburgh'

The revised plans, and recent submissions from other consultees, have not provided sufficient cause for change in the Parish Council position on these applications. We remain opposed to the proposals on all the grounds stated in our prior responses. We have therefore focused this submission on new information.

Highway Safety

We are very disappointed in the way that our and residents' recent concerns and complaints have been handled by both East Suffolk Council and Suffolk County Council, and are becoming very frustrated with the lack of clarity around the likely impact of the highway access provisions in particular.

Although they are only one of many reasons for our objections, they are the area of greatest disagreement and confusion, and since safety is the primary concern of residents we fully support those who have challenged the judgement of the Highway Authority, particularly after their lifting of objections in the response dated 1st April.

Although we asked the Local Planning Authority for help to understand what the likely impacts to highway users, and in particular pedestrians, would be from the revised proposals our request was not given any fair consideration. As a result, we can only state what we believe the impact of the proposal to be based on our own assessment - which is entirely unfavourable based on our own lived experiences.

We consider that the resulting highway conditions on Lower Road, Park Road and Meeting Lane would be completely unacceptable from a pedestrian safety perspective and extremely compromised in terms of achieving efficient traffic flow. The lanes are simply too narrow and devoid of suitable refuge areas to allow safe passage by those on foot, wheelchair or horseback in the face of increase vehicular traffic from the development.

That the Highway Authority have insisted on companion footpaths for only Chapel Road and less than half of Park Road is a great concern to us, since they are recognising that we need to get pedestrians off impacted lanes, but seemingly only where it is convenient for the developer to do so. The overwhelming majority of impacted pedestrian routes will remain unchanged which of course does not accord with National Planning Policy, which is very clear that pedestrian safety is of utmost importance when assessing planning applications and that all impacts need to be judged; not just those in the power of the applicant to fix.

Since the Local Planning Authority did not feel the need to help us to answer these questions to help with our response, we trust we can expect to see them considered in the case officer's report to the Planning Committee:

1. What are the differences between the highway conditions along Chapel Road and the eastern section of Park Road as compared to Lower Road, Meeting Lane and the western section of Park Road, such that the former required mitigation measures in the form of companion footpaths, but the latter do not?

2. What does the Local Planning Authority assess to be the impact to pedestrians along the western section of Park Road with the introduction of road widening, two-way traffic flow, HGVs and a general increase in traffic volumes?
3. How does the Local Planning Authority view the highway conditions along Lower Road, and what do they assess the impact to be of increased traffic volumes on pedestrians using Lower Road?

Although we welcome the proposed improvements to local junctions around the site, we still question whether the visibility splays needed can be achieved within the highway boundary and considering the vegetation that impacts visibility all year round.

Footpath 20

For us, Footpath 20 remains a major concern. Aside from its limited dimensions and the poor suitability of the route for main access to/from the development, we have come to learn that the footpath sits entirely outside of land controlled by the applicant, with no permission from any of the landowners concerned to conduct excavations or tree/hedge-row removal as indicated in the application.

Mistakes happen, and in this instance the Ordnance Survey has consolidated the field boundary and footpath into a single map feature, when in fact the legally defined footpath sits a few feet away from the boundary, along the hedge and fence line to the north. On the ground, a desire line has emerged taking walkers off the legal path more southwards through a convenient gap in a hedge; it is therefore understandable that the applicant made a mistake in their submission. However, Suffolk County Council PROW team have subsequently failed to correct this error by examining the proposal against their own Definitive Map and highlighting the problem.

Although we acknowledge that highways can approve works within the footprint of the footpath, we understand that they do not have powers to approve/demand works outside of the footpath as needed for levelling and accessing the footpath from the development site, unless agreed with the landowners. We would welcome correction on this point if we are mistaken.

The planning conditions suggested for the upgrades to the footpath are therefore, at best, deeply flawed but potentially unlawful and likely to force undeserving landowners into a legal dispute with the applicant. When you consider the landowners in question are regular homeowners, some elderly and potentially vulnerable this is a wholly unacceptable situation for the Local Planning Authority to knowingly impose upon them.

It also appears that the path over the recreation ground will be unlit, and un-overlooked. Whilst crime and antisocial behaviour was not something at the forefront of our minds when assessing this proposal previously, the submission from the Design Out Crime Officer brought this matter into sharp focus. Aside from the deficiencies pointed out on the site itself, we wish to highlight the problem with asking future residents to access the estate along this path in the dark and, if the applicant's design is accurate, with 5 inch steps off some sections to avoid root protection areas. We have further questions that we would really appreciate being incorporated into the case officer's report to the Planning Committee since we did not get the answers after our previous correspondence:

4. Does the position and route of Footpath 20 as detailed on the applicant's layout plan exactly match that detailed in the Definitive Statement and Map?

5. Does any part of Footpath 20 pass through land controlled by the applicant, or have they provided evidence that they have been permitted access by third party landowners?
6. Does the Highway Authority possess powers to permit the excavation and resurfacing of third party land in order to connect the development to Footpath 20?
7. Does the Highway Authority possess powers to permit the levelling of third party land outside of the defined limits of Footpath 20 to ensure a continuous flat surface either side of the resurfaced path?
8. Does the Highway Authority have powers to permit the removal of trees and hedgerows on third party land, outside of the limits of Footpath 20 or otherwise not interfering with the function of Footpath 20?
9. In the absence of dedicated cycle routes, what does the Local Planning Authority believe is appropriate mitigation for the risks associated with cyclists using an upgraded Footpath 20 to access the school and other village services?

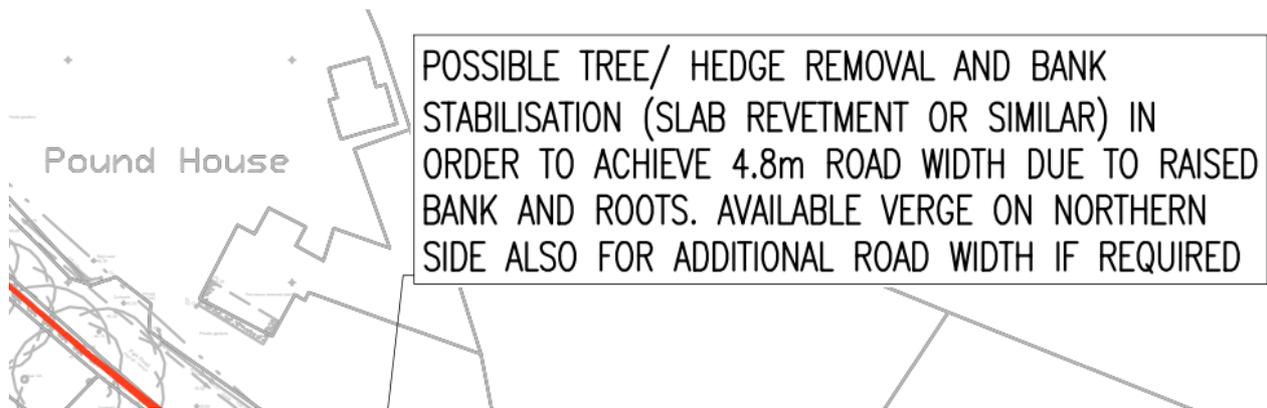
Arboriculture

We are pleased that both Mr. Newton of East Suffolk Council and Aspect Arboriculture issued supplementary information regarding the impact to trees and hedgerows from the proposal. Although the extra information would have been best provided in their initial reports, and with much less protestation, we are glad that reviewing officers and members have clarity that what the Parish Council highlighted about those initial submissions is correct; that the construction works proposed do not in fact accord with the guidelines set in BS 5837:2012, but rather are acceptable in Mr. Newton's and Aspect Arboriculture's professional judgement. This is fine of course, but should have been made clear from the outset, instead of initially using statements like 'within the thresholds' when this was not in fact the case.

We did not criticise the approach taken or quality of the survey as stated by Aspect which, to the contrary, we consider to be of a high standard overall. We simply find it difficult to understand how Aspect could so diligently support the British Standards guidelines in every way apart from in the assessing the impact of construction on Park Road's trees and hedges, where it is arguably most important to preserve the setting of the Grundisburgh Hall Park.

Lastly, to the statement from Aspect that 'the claims by the Parish Council are not technically cogent or robust, and do not benefit from the application of professional judgement' we would like to point out that it is not purely our own judgement that Park Road's widening will have a negative impact on the trees and hedgerows to the south, but is a view shared by Ingent Consulting Engineers, also appointed by the applicant. Their technical drawing 1812-296-001B from May 2019 quite clearly states in reference to Park Road:

'Possible tree/hedge removal and bank stabilisation in order to achieve 4.8m road width



section of drawing 1812-296-001B May 2019 provided by Ingent Consulting Engineers

due to raised bank and roots'.

Since our view is therefore technically cogent, robust, and benefits from the application of professional judgement, we now quite rightly ask the question: which of the applicant's assessments concerning Park Road's trees are to be considered correct? Aspect's or Ingent's? We consider Ingent's to be the most accurate since they also considered the steep bank without being forced to. The proposals require excavation to within 300mm of some tree trunks, and to a depth of approximately 300mm. It is entirely reasonable to expect that this will impact root systems, potentially upsetting tree health and stability along significant stretches of Park Road.