



Mr Jonathan Alden  
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3<sup>rd</sup> August 2024

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Dear Mr Alden,

**Your Reference: APP/X3540/W/24/3344009**

**East Suffolk Council Planning Reference: DC/23/3265/FUL**

**Proposal: Construction of one x 2 bedroom and two x 3-bedroom bungalows with garages and associated boundary treatments, landscaping, and EV charging points for the occupation of people aged 55 and over.**

**Site address: Land Adjacent Chequers Public House, Easton Road, Kettleburgh, Suffolk, IP13 7JT**

I write for and on behalf of Kettleburgh Parish Council. The Council reconsidered the above planning application at its meeting on 10<sup>th</sup> July 2024 and resolved that it **maintained its position in objecting in the strongest terms.**

Its reasons were set out in the Parish Council response dated 12<sup>th</sup> October 2023. Council would now like to amplify its key points and put right some misleading arguments presented by the applicant's consultants:

### **Flooding**

The Planning Officer's Report (p 21) noted that there was a Flood Risk, with-surface water flooding being an issue in the village. Heal comments that the site lies in Flood Zone 1 and as such, flood risk does not form a concern. This misses the point. The development poses a significant risk not to the site itself; it exacerbates the incidence and severity of flooding in the village. It is therefore of great concern to residents.

Further to the long history of flooding in Kettleburgh, Storm Babet, then Storm Ciara hit Kettleburgh on 22<sup>nd</sup> October 2023. Again, significant flooding followed, with eight residents forced to leave their internally flooded home and relocate for weeks. This included the applicant, demonstrating that significant flood water can be generated by the Deben overflowing close to the application site, and Pluvial flooding when heavy rainfall in a short period of time overwhelms the ground's ability to absorb it. Many other residents were affected.

The mature hedge abutting the road and to the left of a current field entrance that was due to be stopped up (application plans dated 23/10/23) has just been clear felled for about 20m.

Based on its long-term observations, Council believes that water is contained or at least held up in the wider area of the application by grassland and trees abutted by the mature hedge. But the combination of significant new hard surfaces and foundations, along with removal of this hedge



would lead to more water flowing onto and down the Easton Road to the T-Junction with The Street, the low point where the most significant flooding occurs.

### **Building in Countryside**

Council finds Heals' elaborate attempts to extricate the application from long-standing controls on building outside the village envelope in Countryside unconvincing. **This development fails SCLP 5.3 g) because it would not enhance or maintain vitality in Kettleburgh (NPPF 83).** Even given the new Government's ambitions, **NPPF 84 "Planning policies and decisions should avoid the development of isolated homes in the countryside" must apply.**

**As the proposed buildings, having no exceptional qualities, also fail NPPF 84(e), Council respectfully asks that well-established policy on development in the countryside be upheld - as was the case in two earlier similar cases.**

The area surrounding the Mill House is not only countryside, but one of the most scenically attractive areas in East Suffolk. The application site is not a 'vacant plot' (suggesting wasteland). It is an old meadow, part of a sylvan mosaic of trees and other meadows stretching from the banks of the river Deben over several acres. **The Ecology Officer has correctly said that the application site is in an important buffer zone.**

The applicant's lack of appreciation of the countryside is evidenced by the recent removal of roadside hedging associated with the application area. Several residents have written to the Council shocked at the brutality of this action.

As stated under 'Flooding', a stretch of long-established high hedge fronting Easton Road has been clear-felled. This forms part of the boundary of the meadow where the development of three bungalows is proposed, but the cleared length does not correlate with the access splay marked in the Application Designs, dated 2<sup>nd</sup> October 2023, meaning that it is likely even more mature hedge will be removed if the appeal is successful. Small amounts of new hedging would be no replacement.

This removal, besides being a pre-emption of due process, may, Council believes, be in contravention of The Hedgerows Regulations 1997 and the Management of Hedgerows (England) Regulations. Council is therefore considering enforcement action.

As these were old hedges, a considerable amount of wildlife habitat will already have been destroyed. The nature of the road outlook has been substantively altered for the worse, but with no improvement to safety of road users - it remains under a blind summit.

### **Highway Safety**

Heal's Technical Note provides a large amount of detail but that seems to be aimed at obfuscating the central points. It refers to the Easton Road as 'a quiet country lane', further evidence of disconnect from the local area. It is not a lane (suggesting a tranquil safe scene): it looks and is used like the B-roads locally, connecting at one end Wickham Market to at the other end Ipswich and is used by motorists and commercial and agricultural vehicles travelling between a series of villages, schools, farms and other facilities in between. The speed monitoring 'evidence' cited was, Council believes, not collected by Suffolk County Council and the Manual for Streets used selectively.

### *Traffic*

Council has been working with Suffolk Highways for several years in response to residents' long held concerns regarding speeding and feeling unsafe, culminating in a Traffic Speed Survey on the Easton



Road. (Suffolk County Council Speed Data recording 14/03/2024-20/03/2024.) The results describe **a busy working road travelled by over 1000 vehicles a day at speeds of between 25mph and 55mph**, with variation in speeds and volumes depending on time of day and day of the week. Council would be happy to provide detail of the survey. The Technical Note's assertion that traffic seems to slow on the stretch in question is perhaps correct – but it is because even the most Gung Ho of drivers can see how dangerous it is.

**The Planning Officer has therefore correctly stated “...least safe/appropriate location for a handful of houses”.** (Technical Note p 21) Heal's response that it is unclear what is meant by this comment, may arise from its position in Shropshire looking at an aerial photograph. On the ground, the gradient, blind summit, lack of time to react, steep sides and resulting lack of refuge are immediately evident.

The Technical Note goes into much detail of splays. No splay can make the proposed access safe. Traffic emerging over the blind summit above the site, coming unexpectedly on a vehicle exiting the development, would have to brake hard and rapidly to avoid an accident. Any hesitation or slow reaction would be catastrophic. The road can be strewn with flint gravel and might be iced in winter as it is usually shaded. If two vehicles are approaching head on and there is a pedestrian on this stretch, none of the parties has anywhere to go.

#### *On foot*

Heal's Technical Note (TN) compares the speed data measurements 'Manual for Streets, (MfS). It is inappropriate use of the MfS to say that *“Occupants could easily access the village on foot along Easton Road, a quiet country road.”* Only by walking the stretch of road in question can one appreciate its 'fear factor'. The type and frequency of traffic, gradient, the absence of any verge, with banks topped by tall hedgerows on both sides, providing no sanctuary from cars and the many large lorries (these can fill the road width) travelling even at the admitted 36-38 mph - quite fast enough to be fatal. Nobody locally would walk that stretch of road, let alone an elderly person, or regularly each way to a bus.

Heal states that “The village can be accessed just 0.25 miles along the lane by foot or cycle”. From here, public transport can be accessed to nearby towns and villages. (Technical Note, page 42-23, c) and d)). This is disingenuous. Yes, there are very occasional bus services for the time being, but they are limited as to destinations and not timed in a way as to represent a lifestyle choice for the elderly. An elderly person struggling up this stretch of road with heavy bags of shopping from the bus is just not plausible.

**Occupants of the new bungalows would be entirely dependent on their cars**, would risk the Russian Roulette of getting onto the Easton Road each time they used them, and **could not walk safely between their home and the village. The proposals therefore do fail SCLP 7.1, in particular 7.1 d).**

Yours sincerely

Sonia Frost

*[Signed electronically]*

Clerk to Kettleburgh Parish Council

CC: Natalie Webb, Planning Officer, East Suffolk Council (planning@eastsuffolk.gov.uk)