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2<sup>nd</sup> February 2025

Dear Jamie,

**DC/25/0041/P3Q**

**Proposal: Conversion of Agricultural building to residential dwelling.**

**Site address: Land and Barn Adjacent to Easton Road, Kettleburgh, Suffolk**

I write for and on behalf of Kettleburgh Parish Council.

The Council considered the above application at its meeting on 21/01/2025 and resolved to **object**. It sees no leeway for the development to be allowed whether it is deemed 'permitted' or not.

It may be that you should re-consider whether this is a lawful Class Q permitted development, so that Prior Approval would not be applicable. This is a change of use from an outbuilding that is not a barn, or agricultural, within the setting of a listed building, to a residential home. It might briefly have penned sheep used occasionally for grounds management but that is not agriculture.

If Class Q applies: 1. **there is no existing suitable vehicular access**; 2. **Visual amenity would be adversely impacted (it already has been by wholesale historic hedge removal)**. The application envisages building outside the Village Boundary, in the Countryside, in an area that contributes to the scenic setting of the wider B7 Deben Valley landscape character area, without mitigation through design excellence. Impact may be worse - the exact curtilage details have not yet been made clear.

This proposal must also be seen as a 'Trojan Horse', providing new access that could allow revival of the previous application to build bungalows and the nucleus for future claims of a 'cluster'. There has been no meaningful community engagement, and Council urges you to again refuse development in this visually important setting and buffer zone: and require the reinstatement of cleared hedgerows.

Yours sincerely,

*[Signed electronically]*

Sonia Frost  
Clerk to Kettleburgh Parish Council  
**Annexed – Detailed Analysis**  
Encl. (none)



## Annexe - Detailed Analysis

### 1. Lack of existing suitable vehicular access and harm to Highway Safety

The pre-emptive felling of hedgerow does not make the resulting potential splay and rustic wooden gate suitable for vehicular access as required by Class Q.

Class Q development rules prohibit the rebuilding, or even conversion, of a building without an existing suitable access to a public highway. Notwithstanding the removal of historic hedgerow, the existing access remains patently unsuitable due to lack of visibility and other traffic risk.

The LPS Supporting Statement states:

“3.8 The site is accessed off Easton Road which has an existing and long-established entrance which provides vehicular access to the barn. The government's ‘Crashmap’ website confirms that in 5 years of accident records, there has not been a single incident on Easton Road or close to the driveway access.”

It is unsurprising that there have been few accidents as vehicles do not currently access the area of the application. But there has been at least one fatal accident adjacent to the area. At the top of the hill at the entrance to ‘Manly’ a car coming from the Easton direction collided with a car turning left into Manly. An occupant of the turning vehicle suffered fatal injuries.

**As can be seen from the following photographs, the current rustic field gate has in fact had little use for many years and does not ‘access the barn’.** A local resident\* tells us that earlier, when occasionally used by tractors and mowers, it was necessary to use a banksman to see the vehicle on and off site due to the poor visibility. Since then, traffic has increased, and the entrance has fallen into disuse. Fig 1, following, shows access to the field being via a different gate adjacent to the proposed conversion site and next to the public footpath (Fig 2). In July 2024 the hedging to the road access was as we have said clear-felled but there has still been no apparent vehicular use.



Figure 1: Road entrance Sept. 2023 (all photos © WJ Clark)



Figure 2: Field access in Sept 2023

Figure 3 is a sequence of photos taken from the proposed splay at the road entrance, which show the rapid emergence of a typical vehicle coming over the summit from the Easton direction. These photographs demonstrate that the applicant has not understood the local topography. The access requirements for a dwelling in daily use are more stringent than occasional estate access.



Figure 3: Photos taken from centre line of proposed splay showing sudden appearance of a moving vehicle from the Easton Direction

Figure 4 shows that the proposed entrance cannot be seen from Easton Road when approaching from the South:



Proposed site  
entrance is over  
brow of hill

Figure 4: Easton Road going uphill towards proposed site entrance



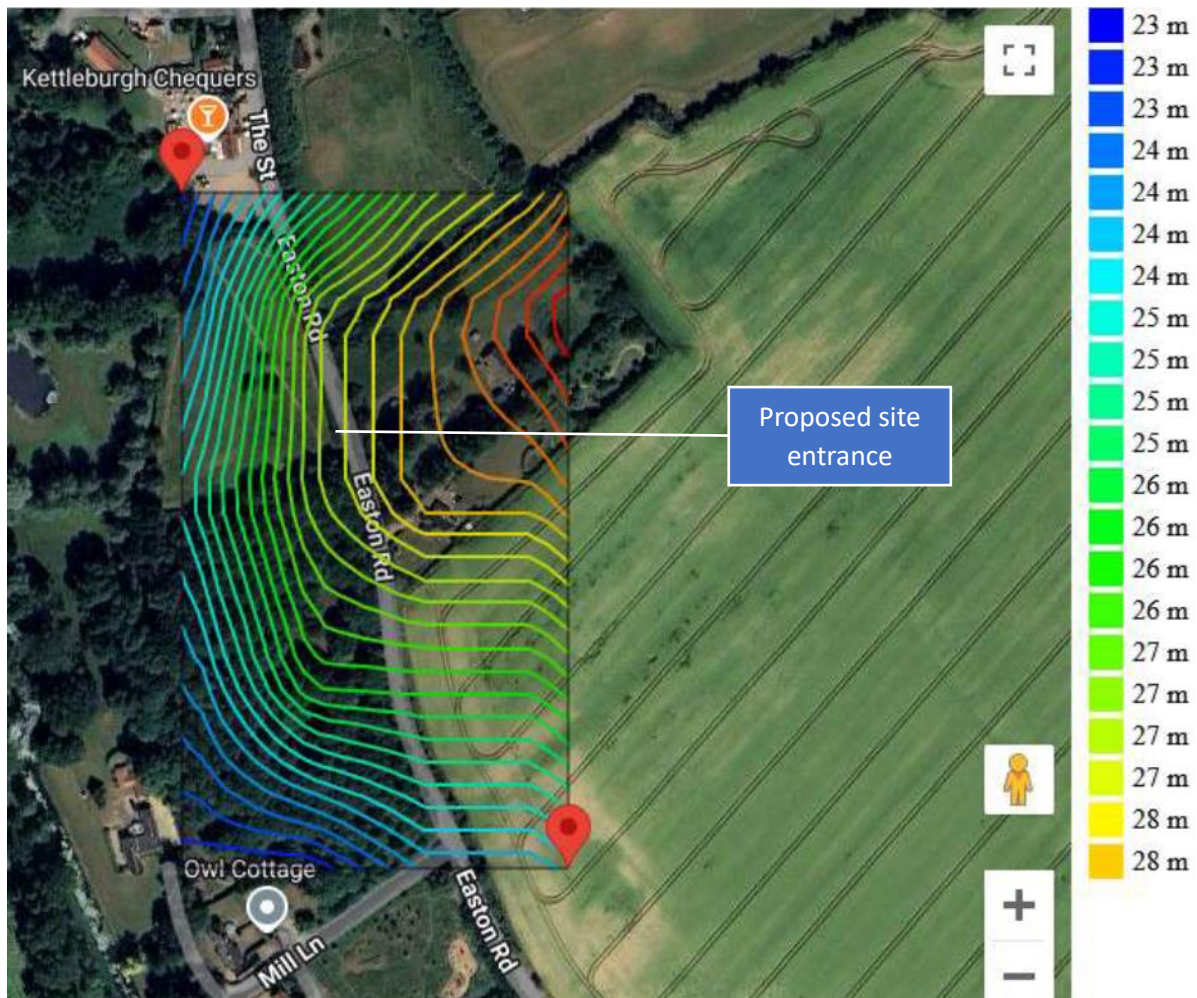


Figure 5 Contour lines showing steepness of hill from Easton on approach to site

Figure 5, above, provides context for the ‘on the ground’ photographs, showing the contours, therefore the slope of the hill, and the curve of the road.

Figure 6, following, uses the document “Proposed Access Improvements 5347336” superimposed on a map to show the complete visibility line. In practice the visibility is even less than that shown due to the curve of the road and the slope of the hill as shown above.



Figure 6: Sight Lines of splay superimposed on Map of Easton Road and setting of listed building



The approach to the entrance of the proposed site is subject to the 60mph National limit, on a steep gradient, with the road both narrowing and curving near to the crest of a hill. The Highway is a Class III Road being a narrow lane having near vertical hedges and no footway. Many large agricultural and haulage vehicles use it, and these often fill the carriageway. The road is not a quiet country lane, 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.

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. It has been noted in the past that traffic seems to slow on the stretch in question – but it is self-evidently because drivers can see how dangerous it is.

We have provided detailed analysis of the dangers for traffic ascending the hill. Traffic emerging over the blind summit above the site would come unexpectedly on any vehicle exiting the development and 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.

Even with a substantial safety splay, as we have shown, visibility exiting the site would be inadequate. Vehicles entering it would need to slow almost to a stop, with other vehicles coming over the crest or up the hill having little to no time to slow sufficiently. Even without development, as we have said there has been at least one fatal accident on the section. There is no provision for visitor parking. Delivery vehicles and waste collection vehicles would remain on the narrow highway while they deliver/pick up.

Anyone leaving the proposed development on foot would be at immediate risk with no pavements or grass verges and hemmed in by steep banks.

From its in-depth on the spot knowledge, Council considers the highway risks serious and insurmountable.

**There will be a material increase in the number of vehicles having reason to enter and leave the classified road in a situation where visibility both along the road and at the access point is substandard and would thus be detrimental to the interests of road safety.** Earlier development on the affected section of road including application DC/23/3265/FUL by the same applicant was refused for this reason.

*\* Council is most grateful to the local resident who also kindly gave permission for their photographs and maps to be used.*



## 2. Visual amenity and harm to Countryside

The area surrounding the historic listed Mill House is in no sense agricultural - it is the parkland of a large non-farming house with no specifically rural business interests - an unspoiled sylvan mosaic of mature trees, hedges and meadow stretching from the banks of the river Deben over several acres. The development site is located close to the river (associated with the Deben Estuary SSSI designated area), historic Watermill House, and the Kettleburgh Pound, which may become a designated heritage asset in the future. All these areas come together to form a contiguous area of visually most appealing countryside.

Countryside is defined by the Local Plan and development - of whatever class – must not be allowed in the countryside.

Overarching Policy NPPF 84 “Planning policies and decisions should avoid the development of isolated homes in the countryside” must apply. The proposed building, having no exceptional design qualities, also fails NPPF 84(e).

**Policy SCLP3.3** directs that new residential development will not be permitted in the countryside except where specific policies in the Plan indicate otherwise. There is therefore a clear specific policy that unless supported by specific policies elsewhere in the Plan, the countryside must be protected, and permission needs to be refused. There is no Area Policy supporting development - of any class - on the proposed site.

The development does not comply with SCLP 5.5 on the conversion of buildings in the countryside for residential use because: the building is not redundant – it could still be used as before; it does not provide a positive contribution to the landscape; the conversion requires significant alteration; the design does not enhance the structure, form and character of the rural building; the design of the rebuild is not of great merit and will have a harmful effect on the character of the landscape and setting of a listed building; the pre-emptive clear-felling of old hedgerow evidences indifference to effects on the natural environment; the conversion certainly would not enhance the immediate setting of the area; and the site is not served by an appropriate existing access (see section 2. below).

Footpath 26 runs beside the site. The current frequently enjoyed sylvan views from it would be ruined by this development in terms of amenity value.

The applicant’s clear felling of a large area of historic hedgerow along Easton Road has already opened views into the site along this boundary and spoiled the contained rural character of the road.

The proposal is already causing serious injury to visual amenity, and this would be worsened further by a dwelling being sited in attractive countryside, thus forming a prominent feature from the cleared road edge, adding to the existing damage to the character of the locality. Previous development adjacent to the current site was refused for this reason.

The proposal would not comply with NPPF174 because it would fail to recognise the intrinsic beauty and character of the affected countryside. It is not sensitive to its surroundings and would therefore also fail to meet SCLP4.5 c) as it would result in an adverse impact to the landscape character (‘River Valley Landscape’ within the Suffolk Coastal Landscape Character Assessment [SCLCA] and Settlement Sensitivity Assessment), where the site lies in a sensitive landscape and is not previously developed land. To reiterate, we are not dealing with agricultural land or an agricultural building – the outbuilding is in the parkland of a historic listed building.



**Landscape Character Policy SCLP10.4** clearly states that development will not be permitted where it will have a significant adverse impact on rural river valleys. It requires that proposals be informed by, and sympathetic to, the special qualities and features as described in the SCLCA.

The B7 Deben Valley landscape character area is comprised of valley floor and valley side landscapes. An earlier professional landscape report noted that it is “a remote, sparsely settled, and quiet landscape, ‘made scenic by the combination of old pastures, gently rolling farmland and historic settlement clusters’.”

That advice was clear that the area of the outbuilding: “provides an important buffer between the sensitive river valley to the west and existing village infrastructure to the north-east”; and “helps to soften the settlement edge and provide an effective rural/urban transition.” Also, that “development would negatively affect the character of the rural river landscape”.

**This development would without doubt have, and is already having, an adverse impact upon the visual amenity of one of the best known and most scenically attractive areas of Countryside in East Suffolk.**