

KIRTON & FALKENHAM PARISH COUNCIL

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4<sup>th</sup> February 2019

Dear Ms. Harvey ,

PINS Appeal Reference: **APP/J3530/W/18/3212430**

Suffolk Coastal References: Appeal APP/005/2019 against planning application DC/18/0105/FUL:

Land between 73 and 101 Bucklesham Road, Kirton, Suffolk

Erection of 10 new dwellings and creation of new vehicular access and internal service road

Kirton & Falkenham Parish Council has considered the above appeal and wishes to oppose the Appeal, judging it to have no benefit to the local community. Its reasons are listed below.

The Appendix to this document is the Parish Council's response to the original application.

We would request that the Parish Council is given an opportunity to speak at the hearing.

Background

The current Local Plan proposed 7 houses for Kirton. So far there have been at least 45 constructed. Kirton has had considerably more housing constructed than was planned for in the current FPAAP, and several more are under development.

Kirton already has more affordable housing than any other village in the District. Kirton also has 30 estate houses to rent as well as other private rentals.

The part of Kirton which SCDC proposes for housing has poor sewerage service with problems experienced by residents.

The recent housing growth in the village has not improved services nor is there any evidence that it has retained the few services that we do have. There is no school within the village and the closest primary school, which is a mile from the village centre, is currently subject to a proposal from the County Council to close the site and move it to a location on the other side of the A14, an additional mile in distance. There is no shop for basic foods, medical or other services. There is no public transport with sufficient timing to allow work commuting by public transport. The village consensus, derived from well attended village meetings, is that we should have no more growth in the short and medium term, and that we do not wish to continue to grow as a dormitory village from which private cars have to be used for commuting and access to services.

Kirton is a village with almost no services and a bus service which it is not possible to use for regular commuting and use of leisure facilities, due to the infrequency and timing of the buses. Any further housing growth will further push Kirton into becoming a dormitory village, with access to shops, work and education only possible via private car.

## Parish Council Responses to the Appellant's Statement

(GH Paul 1964 Settlement, Prepared by: Nikki O'Hagan, LPA Reference: DC/18/0105/FUL,  
Date:25.09.2018)

### **Description of development site and proposals**

We take issue with the appellant's statement of services in the village, which appears to create an excessive view of the services available.

"The Local Service Centre of Kirton, as identified within the Core Strategy, is considered to be capable of supporting some small-scale housing developments and provides a limited range of services and facilities including a primary school, pubs, a café, a towing service, a sporting goods shop, churches, a landscape gardener, a guitar instruction school and a recreation ground" (page 6) .

#### Corrections & clarifications:

There is no school in Kirton. The nearest primary school is located in the next village, one mile away. It is currently full. The County Council's current favoured solution is to close the school site and relocate the school to a larger site, two miles away across the A14.

There are not pubs – plural. There is a single pub, which does not serve food.

The café is a specialist smoke house. It is open just three days a week, for six ~~house~~ hours each day.

There is no sports shop. The appellant appears to have confused the fact that the owner of a sports shop, situated in Felixstowe, lives in the village.

As the appellant states, the bus service is limited, preventing its use for commuting, and so relying working villagers to rely on cars.

### **1 Issue One: Five-year housing land supply position**

#### **1.1 Apparent inconsistency between appellant's figures of SCDC housing supply and those of SCDC**

The appellant claims that SCDC are suggesting a housing requirement of 465 dwellings per annum (dpa) and that this does not represent a sufficient housing supply, justifying the development of this site (page24, para. 7). The appellant proposes that SCDC should be planning for 495 dpa to meet minimum government standards (page 24, para. 9).

On the contrary, SCDC's Final Draft Local Plan plans for 582 dpa (page 17, table 2.1), negating the appellant's argument.

#### **1.2 SCDC appears to already meet the housing figures proposed as required by the appellant**

The appellant then defines a table with several buffer scenarios (page 25). The SCDC Final Draft Local Plan figure of 582 dpa exceeds the 10%, and nearly reaches the 20%, figures in the appellant's table, which the appellant suggests that 5% could be sufficient. Again, the Final Draft Local Plan appears to negate the appellant's argument.

### **2 Issue Two: The Council's recent assessments of the appeal site**

#### **2.1 Apparent incorrect representation by the appellant of the Felixstowe Pensinsula Area Action Plan**

The appellant claims that in the Felixstowe Pensinsula Area Action Plan, 2017, (FPAAP) SCDC had allocated 50 units of housing for Kirton in the 2017 FPAAP, by adding the 7 units as the Contribution 1/4/2010 –31/3/2015 to the 43 houses constructed at what is now called Paddocks Close (pages 26, 27). It appears that the appellant is incorrect in this analysis. A reading of the FPAAP shows that the 7 houses is the total allocation for Kirton for the period 2010-2027 (page21, table 2). The 43 houses of Paddocks Close exceeded the requirement by 36 houses. There have been a handful of individual constructions since then, further increasing the excess of development in Kirton. For clarity, the following is a quote from the FPAAP "The village of Kirton is identified as a Local Service Centre in the Core Strategy Settlement Hierarchy. Since 2010, Kirton has seen some housing development in the form of infill as

detailed in Policy FPP1 and more recently 43 units have been permitted at Falkenham Road (DC/14/4225/FUL). Collectively these developments are considered to have provided the level of growth appropriate for Kirton and therefore no further individual sites have been identified as allocations in the AAP." (page 45, para. 3.119)

## **2.2 The Parish Council and the residents have significant sustainability concerns**

SCDC's sustainability analysis is overall negative for Social Effects, overall negative for Environmental Effects and slightly positive for Economic Effects. This gives an aggregate of negative sustainability, whilst every other preferred options site is assessed as positive sustainability. We note that SCDC does state that 325a scores poorly for environmental effects and that it is unlikely that these can be mitigated.

### **3 Issue Three: Housing development in the countryside**

The site is outside the physical planning boundaries of the village.

### **4 Issue Four: Impact on the Landscape, Special Landscape Area and Grade II Listed Kirton Manor**

The residents consider that this will be a significant loss of amenity.

Residents have highlighted the effect on the environment; wildlife, trees and the Special Landscape Area, including this site. If this site is developed, then the entire village will lose the visual amenity of this Special Landscape Area.

### **5 Issue Five: Highways impact**

**Residents have concerns about visibility and pavement width.**

Residents have raised valid concerns about the access visibility to the road and also the danger and frequent jams due to large agricultural vehicles and buses negotiating the narrow road with tight bends, unable to pass each other. The pavement is insufficiently wide for pushchair and mobility scooters.

Yours faithfully,

Colin Shaw,

Clerk to Kirton & Falkenham Parish Council

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# Appendix

## KIRTON & FALKENHAM PARISH COUNCIL

Chairman: Mr G W Walker  
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Head of Planning Services  
Planning & Coastal Management  
Suffolk Coastal District Council  
Melton Hill  
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Dear Sir

Your Ref: DC/18/0105/FUL  
Our Ref: parpl0318.wps

13<sup>th</sup> February 2018

Land between 73 and 101 Bucklesham Road, Kirton  
Erection of 10 new dwellings and creation of new vehicular access and internal service road

Kirton & Falkenham Parish Council has considered the above application and opposes the proposals judging it to have no benefit to the local community. Its reasons are listed below.

### Housing needs in Kirton

The SCDC Local Plan states that there is no requirement for further housing in Kirton for the period to 2017. The current, approved, Felixstowe Peninsula Action Plan (FPAAP) has a figure of zero for new housing allocations between April 2015 and 2027 (paragraph 3.119 of FPAAP). Since April 2015 then at least 43 new houses have been built, therefore we have a very significant excess of housing over the need identified in the Local Plan.

Kirton is a village with almost no services and a bus service which it is not possible to use for regular commuting and use of leisure facilities, due to the infrequency and timing of the buses.

Any further housing growth will further push Kirton into becoming a dormitory village, with access to shops, work and education only possible via private car. This is against SCDC environmental intentions.

The two local primary schools are already reported as full due largely to increased housing in Trimley St. Martin. It would be misleading for young families looking to purchase new houses to assume that they will be able to gain entry to those schools. The traffic situation outside the schools is currently unacceptable, and no proposal to mitigate this has been put forward.

### Application site specific comments

The site is not within the Kirton Physical Boundary Limits (FPAAP Page 125).

The site is within an SLA (SCDC Site Assessment).

The site is a key visual amenity, forming part of the character of the village of rows of houses broken up by gaps of countryside. SCDC recognises the importance of such gaps in its Local Plan Revision Consultation Document.

It should be noted that SCDC's Site Assessments states that site 654, within which the area for the planning application lies, has surface water flooding at the south and centre of the site, and the southern boundary of the site (not apparently part of the application area) is a watercourse.

SCDC's Site Assessments states that a Grade II listed building is to the east of the site. This is Kirton Manor; the landscape character of its environs will be significantly affected.

There have been numerous complaints by residents of Bucklesham Road regarding sewage blocking, flooding and smells. The infrastructure appears inadequate.

Plot 10 is too close to a mature oak tree, with potential impact on known bat roost.

The introduction of a zebra crossing into this rural environment requires consultation on implications.

The application proposes to install a pipe within the ditch which currently carries rainwater along the boundary of the site. This ditch currently allows rainwater to soak away. There is a concern that the proposed pipe may instead carry the water to a currently dry ditch on the boundary of 101 Bucklesham Road, causing potential new flooding issues.

#### Highways Specific Comments

Residents have raised valid concerns about the access visibility to the road and the danger and frequent jams due to large agricultural vehicles and buses negotiating the narrow road with tight bends, unable to pass each other.

Although Highways appear to have indicated that there is adequate visibility (with changes to the application) for the access to the site, the same is not true for existing houses opposite. The residents of these houses report significant danger due to the poor visibility of access on their side of the road. Having vehicles from ten houses also accessing the Bucklesham Road from the other side of the same length of road will create further complication of traffic movements and increase likelihood of accidents.

The provision for parking appears inadequate when visitor and delivery parking is considered. The only provision for such extra parking would be on Bucklesham Road itself, which given the width, visibility and volume of traffic would be dangerous. This would be exacerbated by the application's proposal of a gravel path for vehicles. Many delivery drivers refuse to drive on gravel paths and are likely instead to park on Bucklesham Road.

The development may exacerbate issues with farm traffic exiting the farm track adjacent to No 82. Farm traffic already appears to have problems egressing onto Bucklesham Road, due to its limited road width.

The surface of Bucklesham Road is deteriorating, due it seems to traffic volumes and rainwater flow. The extra houses would be expected to accelerate the deterioration particularly since the changed arrangements for rainwater disposal may cause deterioration by the roadside.

Yours faithfully

C A Shaw

Clerk, Kirton & Falkenham  
PC

CC Mrs S Harvey (DC)