

**. Kirton & Falkenham Parish Council response to the proposed housing in the
Draft Local Plan**

27th August 2018.

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1 Parish Council response to SCDC’s use of obsolete growth base data for housing and employment land estimates

In its 2017 response to the Issues and Options document, the Parish Council highlighted to SCDC that the figures which it used as base data for economic and housing growth from the Office for National Statistics (ONS) and the Organisation for Economic Co-operation and Development (OECD) were obsolete, dating from 2015 and 2014 respectively. Subsequently the ONS and OECD published in 2016 and 2017 much lower growth figures, yet SCDC appear to have ignored this and continued to use the obsolete higher figures for growth in this Draft Local Plan.

Unless SCDC addresses this in its final version, its data will be based upon figures 4 year obsolete (ONS) and 5 years obsolete (OECD).

2 Parish Council response to draft policy SCLP12.51: Land to the rear of 31-27 Bucklesham Road, Kirton.

2.1 SCDC Draft Local Plan - extract

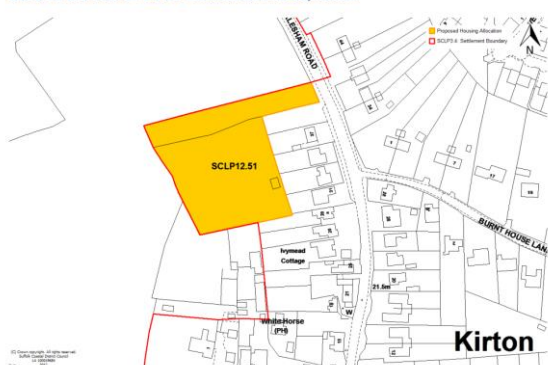
Policy SCLP12.51: Land to the rear of 31-37 Bucklesham Road, Kirton

0.56ha of land to the rear of 31-37 Bucklesham Road, Kirton, as shown on the Policies Map, is allocated for the development of approximately 12 dwellings.

Development will be expected to accord with the following criteria:

- a) Provision of affordable housing;
- b) Retention of trees and hedgerows on boundaries of the site wherever possible; and
- c) Surface water disposal to be in accordance with the water management hierarchy.

Land to the rear of 31-37 Bucklesham Road, Kirton



12.382 Kirton (2011 pop. 1,146) is identified as a Small Village in the settlement hierarchy, having a small range of services and facilities including a village hall and a public house. The site is currently in agricultural use and is located in the centre of the village, to the west of Bucklesham Road.

12.383 Whilst most of the village of Kirton extends to the east of Bucklesham Road, this site forms part of a small, well contained area of existing dwellings and the public house to the west of the road. The development of this site would provide a modest number of homes for the village, whilst retaining open spaces along Bucklesham Road. The site is enclosed by existing trees and hedgerows which should be retained in order to minimise impacts on the landscape. Due to the enclosed nature of the site, it is considered that it could accommodate a relatively high density development for its village location.

12.384 Surface water flooding is recorded in the south east corner of the site. Any development in this area of the site will need to demonstrate mitigation measures designed to alleviate the potential surface water flooding risks. This is required to be undertaken in accordance with the surface water management hierarchy.

12.385 Trimley St Martin Primary School, to the south of Kirton, is forecast to be over capacity within the first five years of the plan period; however Policy SCLP12.62 allocates land for a new primary school to replace the existing school. Development of this site will need to contribute to the provision of additional school places.

12.386 A project level Habitats Regulations Assessment will need to ensure that hydrological impacts are checked and adequately mitigated for if required.

12.387 Additional primary care floorspace will be required at Ravenswood to meet the needs arising from new development, as detailed in the Infrastructure Delivery Framework.

2.2 SCDC Evidence Base for assessment

2.2.1 Topic Paper Settlement Hierarchy.

Kirton is defined as a small village.

2.2.2 Suffolk Coastal Draft Strategic Housing and Economic Land Availability Assessment (July 2018)

Site Details	
Parish / Town	Kirton
Site reference	1077 Land to the rear of 31-37 Bucklesham Road, Kirton
Site Area (hectares)	0.56
Proposed use	Housing
Existing land use	Agriculture
Neighbouring land uses	The site adjoins an established residential area.

Suitability Assessment		
Criterion	Impact	Comments
Access to site	Amber	Potential vehicle access to winding section of Bucklesham Road. No footways access, site is next to a layby which may create visibility issues.
Utilities capacity	Green	No issues identified.
Utilities Infrastructure	Green	No issues identified.
Contamination	Green	No issues identified.
Flood Risk	Amber	FZ1. Surface water flooding to SE of the site.
Coastal Change Risk	Green	No issues identified.
Market Attractiveness	Green	No issues identified.
Landscape and Townscape	Green	Natural grassed site.
Biodiversity	Green	Wild birds in spotted on the adjoining grassed site.
Historic Environment	Green	No issues identified.
Open Space	Green	No issues identified.
Transport and Roads	Amber	Cumulative impacts to winding Bucklesham Road and the wider village that is characterised by narrow lane, limited footways and on street car parking issues. No footways access.
Compatibility with neighbouring uses	Green	The site adjoins an established residential area.
Contribution to regeneration	Green	No issues identified.

Suitability conclusion	Potentially suitable. Issues to be addressed include; access, flood risk, and highways impacts.
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Availability	
Is the site available?	Yes
Evidence of availability / comments	Landowner submission

Achievability	
Is the site achievable?	Yes
Evidence of achievability	No specific issues or abnormal costs identified
Are there any commencement issues?	None identified

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Suffolk Coastal Draft Strategic Housing and Economic Land Availability Assessment (July 2018)

Estimated dwellings yield	8
Estimated employment land yield (hectares)	
Estimated retail floorspace (sqm)	
Estimated commencement date	2021/22

2.3 Parish Council Response

2.3.1 Suitability of Kirton for Additional Housing

The current Local Plan proposed 7 houses for Kirton. So far there have been at least 45 constructed. Kirton has had considerably more housing than was planned for in the current Local Plan, approved in 2016. A further 4 houses are planned for the site of 1 Burnt House Lane, opposite this site.

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

The part of Kirton which SCDC proposes for housing has poor sewerage service, see below.

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 and the closest primary school is at capacity. 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 within which private cars have to be used for commuting and access to services.

2.3.2 Surface Water Flooding

The Draft Local Plan states that surface water can be dispersed. However nearby residents report that that this issue is very significant and that the expectation that it can be managed so readily may well be incorrect. There are springs on the site. The selection of a site prone to flooding is illogical.

Residents report that the site is a flood plain. There is a drainage ditch alongside 37 Bucklesham Road and another ditch alongside 29 Bucklesham Road.

This site has been previously turned down by SCDC due to the flood risk. No action has been taken on this, so it is not sound for SCDC to now propose this site.

2.3.3 Sewerage

The issues with sewerage management along Bucklesham Road have been regularly reported by the Parish Council to Anglian Water and previously highlighted to SCDC. Blockages and sewerage bubbling up through manholes have been an issue for nearby residents for use. Further housing would only exacerbate this.

2.3.4 Access and Roads

The Suffolk Coastal Draft Strategic Housing and Economic Land Availability Assessment scores this site as amber for both access and roads, with the explanations below:

Cumulative impacts to winding Bucklesham Road and the wider village that is characterised by narrow lane, limited footways and on street car parking issues. No footways access.

Potential vehicle access to winding section of Bucklesham Road. No footways access, site is next to a layby which may create visibility issues.

SCDC has chosen to ignore its own evidence base and does not take this into account. The view of villagers is that this access would be dangerous.

2.3.5 Accuracy of Map

Nearby residents report that the map in Draft Local Plan is inaccurate and includes land not owned by the landowner offering up the site. This needs to be verified, in order to determine whether the classification of the site as available is correct.

2.3.6 Habitat

A residence reports a large colony of bats living at the site.