

Easton Parish Council

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September 12th 2015

Mrs T Scott
Case Officer
Planning Inspectorate
3/10 Wing
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Mrs Scott

Re: Appeal Ref: APP/J3530/W/15/3129322 – Easton – DC/14/2244/FUL-Easton Primary School Land Adjacent, The Street, Easton.

I write for an on behalf of Easton Parish Council. The Parish Council is against the Appeal Proposals the reasons are as follows:

Easton Parish Council would like to support their 'Objection' submitted and give reasons with further detail and material that has become apparent following the determination by the LPA for the above application.

1. NO COMMUNITY CONSULTATION TOOK PLACE

No community involvement survey took place for this application.

The only survey which took place was for the withdrawn application DC/13/3768/FUL. The questionnaire had a total of 4 questions, question 1 asked for indication of agreement of appropriateness to develop the SHLAA site previously identified. The SHLAA site referred to being of smaller proportion with the potential maximum of delivery of 8 houses.- (Appendix A)

2. INACCURACIES IN DESIGN AND ACCESS STATEMENT

The Government Practice Guide states:

The level of detail in a Design and Access Statement should be proportionate to the complexity of the application, but should not be long.

The Design and Access Statement is lengthy, and contains inaccuracies namely:-

1.2 – It States the Proposals have been informed by local public consultation and statutory stakeholders.

No community engagement or consultation took place. Comments by individual Parish Councillor/s have been recorded as those of the PC. The individuals were not representative of the Parish council, there was no minuted agreement for a response, at any of the Parish Council meetings convened over the period 2012 to present, Parish Council minutes clearly show this. These personal comments did not represent consultation with the Parish Council. The date of July 13th 2013 is given, there were no Parish Council meetings that took place at this time.

2.1 – States the application proposes 14 dwellings of which 4 will be affordable.

This is not consistent with the Planning Application.

2.6. – States that £50,000 will be paid to SCC for further improvement of primary school facilities

This payment will not be paid, in accordance with the letter submitted by SCC, the development is not deemed to have enough impact on school and playschool role numbers to warrant this payment. (Appendix I)

2.7 – States a proposed payment for 20 mph school safety zone requires road surfacing, electronic signage. **This will be within the conservation area and will not be able to be delivered due to constraints within the conservation area. Ref: Easton Conservation Appraisal.**

3.3 – States that the site slopes up towards predominantly agricultural landscape – **The site is on agricultural land, Grade 2 land, part actively farmed for crop production and part set aside. Protected species such as grass snakes habit this site, and nesting skylarks.**

3.8 – Reference is made to ‘public consultation with existing residents suggests that there is strong support for a limited development’. **No consultation took place and there is no evidence of this consultation, responses, socio-economic breakdown of respondents etc. 44 letters of objection were received by SDCD for this application**

3.11 – Refers to car parking and vehicle circulation for the school. There are safety issues with the current situation.

SCC Highways accident database shows that there have been no recorded accidents during the years that the school has been operational. Two minor accidents are recorded both outside school term time, one in 2006 and one in 2008. The street parking to take children into the school acts as a speed calming measure, traffic proceeds with great caution as a result, and is for 2 times 20 minute slots each term time day. Most of the schools in the region suffer from congestion whilst parents take in and pick up children. There is a car park in the village that parents can use, they

choose for most part not too. There is no evidence within the school newsletters, parents association etc that parents consider the street parking to be a problem.

3.2 States –The proposal site is unconstrained by local or national landscape designations

However the landscape is Ancient. Rolling Estate Claylands, forms historical setting, Grade 2 Agricultural land and has Special landscape designation.

4.2 – Refers to SCI community involvement.

The exhibition held October 2013 and questionnaire was flawed Q1 asked for opinion of development on the registered SHLAA site which was a smaller area of land for maximum 8 dwellings. (Appendix-A). The village has a population of 250 the questionnaire had only 10 people that responded, the breakdown of percentages referred to in 4.2 represents the breakdown of the total of 10 respondents.

4.3 – States that in July 2013 the Parish Council expressed qualified support and suggesting additional details. There is no evidence or minuting of Parish Council meetings that support this statement. No Parish Council meetings took place during July 2013 – the date that is referred to. The submitted response from the Parish Council is one of clear ‘Objection’.

7.1 – Refers to achieving vehicle and pedestrian access without being over dominant.

The splay required for this site access requires the high banking within the conservation area to be cut back to vertical the bank is approx 15 feet high. This would render the cut back bank as unstable and one that would border the highway. To ensure stability hard landscaping to secure would be required, hatching on the road would be required to prevent parents parking on the splay, which would result in an extreme dominance to the visual aspect and within the conservation designated area.

8.4.- Refers to the consultation process and the broad based community support. A proper consultation process did not take place. See 4.2 and 1.2.

The Design and Access Statement repeats the statement that there is ‘strong community support’ when there is not. The emphasis in The Local Plan is that size and suitability of developments for Local Service Centres is very much centred on community support. A total of 44 letters of objection were submitted by the residents of Easton and none of support. The Parish Council did not give qualified support only qualified objection in their response to SCDC.

3. INNACURACIES IN APPLICATION CERTIFICIATION

The Application Form for Planning Permission Town and Country Act 1990 appears to not be completed accurately:

The form has been completed as follows:.

Section 12- Assessment Flood Risk

Q. Is your proposal within 20 metres of a watercourse – The answer given is No.

However the boundary running along the boundary of Veranda now Longbarn cottages, is a vital watercourse. This watercourse takes the surface water drainage from the farmland higher and beyond, when in flood it flows at high speed and force.

Q. Will the proposal increase the flood risk elsewhere – the answer given is No

However it flows directly into the flood plain on the opposite side of the road which is flood zone 3, Appendix G -IDB report, which determines and confirms this.

Section 14 – Existing Use

Describe current use – The answer is Agricultural and school grounds

Q. Is the site currently vacant – The answer given is Yes

However the site consists of active grade 2 arable productive land that is being currently farmed. There is an area of set aside. There is an area owned by the school which is landscaped vehicular access and parking currently used. It is understood this farmland is farmed by a contracted farmer.

Section 15 – Trees and Hedges

Q. Are there trees or hedges on the proposed site. – The answer given is No

However there is a distinctive Horse Chestnut tree and Oak Tree, there is a line of historic ancient hedging running between the school land and the agricultural land on the proposed site.

The Planning Inspectorate Planning Appeal Application Form:

I - AGRICULTURAL HOLDING

a) None of the land to which the appeal relates is, or is part of, an agricultural holding - is Ticked.

However – The land is agricultural grade 2 and farmed by contract, part set aside and part crop production.

4. SUSTAINABILITY

There is no Public Transport, no Bus Service, no Shop, no Post Office, all roads to the village and surrounding areas are roads that are single and non- designated roads, no midway road markings due to lack of width, during high rainfall most roads to access the village flood and become impassable, no secure mobile coverage, poor broadband 2.5 and less. Surface water drainage and flooding problems continue to increase.

Superspeed Broadband is not available. Connections for those outside the 95% rollout are in the 5 percent that BT are permitted by OFCOM not to deliver. Easton falls into this 5% with no prospect of improvement.

5. FLOOD RISK

The Proposed site for the application consists of a boundary formed by a Watercourse with Veranda/LowBarn cottages. This watercourse carries the surface flood water from the high land down to the flood meadows/ river Zone 3 which is opposite the site. (Appendix B- Flood Map & Appendix C - Photo of footage)

NPPF paras 100-104 states that development in areas over a hectare in Flood Zone 1 should be supported by a Flood Risk Assessment to demonstrate the flood risk to and resulting from the development and to demonstrate the safety of the development for its lifetime.

Despite the recd to use SUDs by AWA, Hopkins has stated this is not being used, neither have they requested a report from the IDB as recommended; the surface flood water drains to the Internal Drainage Board's area of responsibility which is adjacent area i.e. the flood

plain and river, this requirement is relevant. (Appendix D- Environ Agency letter and e.mails and AWA Pre Planning Report.)

The Anglian Water Manual details requirements to be met, these include that 'the developer should confirm that the necessary permits and agreements for a discharge into the watercourse have been obtained from the Internal Drainage Board, Environmental Agency and Riparian Owner/s. There is no evidence of this or the following requirements for the Design stage which should be in place.

Source: http://www.anglianwater.co.uk/assets/media/AW_SUDS_manual_AW_FP_WEB.pdf

There should be 3D plans to meet the requirements for calculations to ensure the viability of successful drainage for this 'non-natural' imposition upon the water courses, flood meadows, river and other riparian owners.

The Local Plan DM polices section para 5.74 states - It is important to ensure that new development does not impede flood flows, reduce flood storage capacity, or exacerbate problems of flooding in areas downstream through an increase in run-off from impermeable

6. VISUAL AMENITY and IMPACT ON HERITAGE ASSETS

The rising land elevates the development site. The predominantly large 4 plus bedroomed dwellings with inappropriate density about the existing Grade II listed dwellings, thereby **negatively impacting** the significance of the historic setting and landscape.

The development would be visible from the Wickham Market and Hacheston approach to the village, changing the scene as approaching the village. The attached photograph shows the school playing field fence, Plots 14,15, 11, 12, and 8 are two storey dwellings which will obscure the fencing which gives perspective on the visual impact that this development will have. (Appendix E- photo showing school fence on site to assess height and visibility with Hopkins Layout plan). The Appellants Heritage statement does not appear to recognise the asset of the views in particular from the Hacheston road; it states that they are mainly experienced as part of a vehicular journey, with pedestrian experience limited by the absence of footpaths. The rural and countryside setting appears not to be understood, our rural roads unlike urban and city scapes do not, and cannot have pavements. Walkers, dog walkers, horse-riders and cyclists all do so by using the road itself, the view and setting is of huge significance. The Ancient Rolling Claylands surrounding this site, has Special Countryside designation. (Appendix F – Montage)

The SCC Rolling Estate Claylands Policy Guidance states:

'The spatial relationship of this landscape to the adjacent valley floor means that change and development here can have a profound visual impact on the adjoining valley floor' 'Settlement extension in a valley side landscape is likely to have a significant visual impact and adversely affect the character of the landscape, including that of the valley floor' 'New building needs to be carefully located; it must be of appropriate scale and style as well as being integrated in the existing pattern of vegetation and settlement. (Appendix F Montage)

The low valley lying setting of the village would be interrupted by the proposed dwellings on the rising site. The recognised necessity for landscaping to mitigate this could not take place. The Internal Drainage Board report states root ingress from landscaping creates root ingress

and damage to the attenuated crates and would compromise the drainage system.
(Appendix G - IDB report)

The LPA Decision notice 4.14 states the site is located outside but adjacent to the conservation area. **However**, the car park area and area of splay requiring removal of approx. 15' high grassed banking is **within** the Conservation area. The SCDC Supplementary Policy Document – Easton Conservation Appraisal states that new development adjacent to a conservation area can have a significant impact on character and appearance.

The proposed design of housing does not reflect the sensitive and historic character of the village dwellings and countryside. It negatively impacts the setting and destroys the separation of the historic Grade II listed dwellings that it overlooks and shares the boundary with.

Local Plan Policy DM23 – Residential Amenity states: ‘When considering the impact of new development on residential amenity, the Council will have regard to the following: (a) privacy/overlooking; (b) outlook; (c) access to daylight and sunlight; (d) noise and disturbance; (e) the resulting physical relationship with other properties; (f) light spillage, air quality and other forms of pollution; and (g) safety and security. Development will be acceptable where it **would not** cause an unacceptable loss of amenity to adjoining or future occupiers of the development

There is no sensitivity given to the setting of the Primary School, a Victorian School referred to in the Conservation Appraisal (page 18) as being ‘ a local landmark, it was build c 1892 at the cost of the Duke of Hamilton to replace the small building which is now the Village Hall, it has richly decorated barge boards and gables, with half timbering and the distinctive tall chimneys’ these are found throughout the historic estate they form an architectural signature statement for the village. At this point and entrance to the village, the impression of entering a built up area is gradual, the proposal would drastically change this village approach.

Appendix F - Attach montage

Policies DM21 and SP15 illustrates policy reasons that do not support this proposal.

Local Plan Policy DM21 – Design:Aesthetics.

Proposals that comprise poor visual design and layout, or otherwise seriously detract from the character of their surroundings will not be permitted. Development will be expected to establish a strong sense of place, using street scenes and buildings to create attractive and comfortable places to live, work and visit.

Local Plan SP15 states– ‘In addition to the protected landscape of the AONB, the valleys and tributaries of the Rivers Alde, Blyth, **Deben**, Fynn, Hundred, Mill, Minsmere, Ore, Orwell and Yox, and the designated Parks and Gardens of Historic or Landscape Interest are considered to be particularly significant. Many of the towns and villages in the district are of distinctive historical and architectural value, as well as landscape value and character, and the Council will seek to enhance and preserve these attributes and the quality of life in the generality of urban areas. This strategy will extend to towns and villages where sites, gaps, gardens and spaces that make an important contribution to a particular location in their undeveloped form will be identified and protected where known; or more generally avoided where development in these locations would lead to **coalescence.**’

Easton is a village steeped in history with a plethora of historical dwellings. The Hunt kennels are among the few working hunt kennels in the country. Include history of hunt hounds.

(Appendix H - Attach History) . The village attracts visitors to the local pub, and tourist attraction at the model Victorian farm park. People come to marry at the church from the local area and beyond which together with the wedding venue Easton Grange serves such events. The employment for Easton and locally is Agriculture and Tourism. The village should not be considered for major housing developments, protecting the employment assets related to tourism is vital.

7. PRINCIPLE OF DEVELOPMENT- Land Classification & Suitability

The Local Policies SP27 and SP19 clarifies the hierarchy classification and expected requirements and criteria for delivering housing, this major development proposal is not aligned to the Local Plan policies.

Local Policy SP27 & SP19 states definition of a **Local Service Centre**:

Allocations in the form of minor extensions to some villages which are consistent with their scale and character. Within the defined physical limits development as appropriate normally in the form of (i) Groups or (ii) Infill. Small scale developments within or abutting existing villages in accordance with the Community Right to Build or in line with Village Plans or other clearly locally defined needs **with local support**.

Local Policy SP27 states: The strategy for the communities outside of the Market Towns and the Major Centres and identified as Key and Local Service Centres is to: a) Retain the diverse network of communities, b) permit housing development within defined physical limits or where there is a proven local support in the form of small allocations of a scale appropriate to the size, location and characteristics of the particular community. Potential for expansion likely to be limited, due to environmental and infrastructure limitations. New provision, most likely to be provided through conversion/reuse of existing buildings and have tangible links to the local area.

The Parish Council responded to the recent 2014 SHLAA consultation which is still in process. The site of the proposal has been submitted for a much larger area with higher potential housing figures. The response given by the Parish Council was that they did not support this site as deliverable. However it supports in line with SP27 and the Hierarchy category Local Service Centre, permitting housing within the physical limits and in the form of small allocations through infill. It does not support major development.

The footway link is undeliverable, it takes land from the school sports field; Section 77 of the Government Schools Standard Act protects school sports fields and would prevent this proposal. There has been no application made to the secretary of state accordingly.

The housing density would not be low, the dwellings occupy only 2/3rd of the site the rest is hardstanding for the school car park. The housing mix is weighted more toward larger dwellings which is not in line with a balanced mix of such a site desired under the Local Plan Table 3.6. (Appendix F Montage)

8. CAR PARK

The proposed Car Park would not meet requirements of Local Plan policy DM23 and would not meet the SCC and SCDC Car Park Policies.

Suffolk County Council – Suffolk Guidance For Primary School Parking – Technical 2014 document states:

Schools should not provide parent parking as this is contrary to Travel Plan objectives. Special parking/drop off arrangements may be taken into consideration only if a 'drop and go' facility is established for collection/escort of pupils.

The questions within the document are not satisfied with regard to :

- Are there any 'risks' associated with the layout, such as indiscriminate parking, commercial vehicle parking and hindrance to emergency service access?
- Does the design have regard for the needs of people with disabilities or other mobility issues?
- What is the impact of new parking on historic townscapes and landscapes, including listed buildings, conservation areas and registered parks and gardens, as well as sites of archaeological interest, including scheduled monuments?
- What is the impact of new parking on the landscape and the natural environment?
- What is the impact of surface water run off on water quality and, if negative, have appropriate solutions been proposed?
- Would you be happy to live with the amount and design of the parking shown?

The guidance for Education -primary/secondary school parking is: Teaching: 1 space per 15 pupils plus Visitors: 1 space per 20 pupils.

**SCDC SUPP Planning Document 2002 – Parking Advisory Standards are:
D1 – CAR PARKS - SCHOOLS and COLLEGES OF FURTHER EDUCATION
General**

Adequate turning and loading facilities 1 space per teaching staff member will be required including room for one coach/16.5m lorry space 1 space per 2 ancillary/non-teaching staff 6 visitor spaces or 1 visitor space per 25 pupils whichever is the greater subject to a maximum of 20 spaces. Adequate turning and loading facilities

No provision to be made for parents unless there are overriding circumstances of road safety danger.

4.6.

Position and Lighting

Car parking areas should always be located in such positions that would encourage their use and have a positive impact on the streetscape. They should be designed with adequate lighting and other features, so that people feel comfortable using them, especially after dark. Position and types of lighting should be appropriate for the setting and context of the development proposal.

There is at present provision for car park spaces for parent and staff as detailed in the fore mentioned policies The existing school car park **does not** allow parent parking, it is used only for staff.

Easton Community Speed Initiative programme which runs in conjunction with the police, it was gaining funding and facilitation during the Application process. The programme became operative in May. The statistics show that there are no problems with the area of highway used by parents to park and convey children into and out of the school. Parents do not protest its safety.

During Public Forum at the Parish Council meeting 8.9.15 the Community Speed Co-ordinator for the village reported that it is acknowledged by the police that congestion due to kerbside parking **prevents** speed and forces driving with due care and attention. This is

endorsed for Easton, by the SCC Highways accident data figures, during the operative years of the school there has been no accidents recorded during term time.

A resident that lives opposite the school who experiences the roadside parking by families for school access reported that there is no safety problem and has observed the situation for many years. The main reason he gives, is that traffic reduces its speed and proceeds with caution.

The Applicant has indicated no lighting will form part of the estate and car park. However the school car park must comply with safeguarding children amongst others and therefore will have to include lighting for compliance. The lighting pollution referred to in **Local Policy DM23** is relevant and will be very much a part of the negative amenity and neighbour nuisance attached to this proposal.

Policy DM23 – Residential Amenity states: ‘When considering the impact of new development on residential amenity, the Council will have regard to the following: (a) privacy/overlooking; (b) outlook; (c) access to daylight and sunlight; (d) noise and disturbance; (e) the resulting physical relationship with other properties; (f) light spillage, air quality and other forms of pollution; and (g) safety and security. Development will be acceptable where it **would not** cause an unacceptable loss of amenity to adjoining or future occupiers of the development.

9. BENEFITS & HARM

No real Benefits emerge from this proposal:

- Reduction of School Playing Field for footpath, which would be inaccessible to users with disabilities and mobility issues, steep slope to access the school grounds from the Street.
- The footpath proposed will take away land from the school sports field, and proposes harm to the provision of sports field for education purposes. There is no evidence that this has been applied for or granted by Sec state. Section 77 of the Government Schools Standard Act protects school sports fields .There is no evidence of this application.
- Flashing Speed signage, Conservation area designation constraints will prevent signage
- No payment will be made as quoted in design and access of £50,000 **Appendix I - SCC letter**
- Light Pollution - lighting would be required for the car park, this is stated within the SCC and SCDC Policies for School Car Parks. This would therefore be in addition to the normal lighting issues surrounding a development, security lights, car headlights etc. due to the elevated position of the development **there can be no mitigation. Local Policy DM23**
- Noise resulting from car park at elevated levels to the neighbouring properties, harm to amenity of neighbours. **Local Policy DM23**
- The proposed school car park breaches SCC and SCDC School Car Park policies. 35 spaces is well over the quota permitted by SCC and SCDC and cannot be justified. The mandated criteria of drop off and move on is not appropriate for young children that need escorting into and from the school building.

- The present arrangement for families to access the school is not dangerous – SCC Highways data gives only 2 minor non injury accidents in 2006 and 2008 both outside school term time. No parents have protested the safety for their children.
- Increase in pressure of surface water flooding. No system available to mitigate the position and topography of site, Hopkins have stated they are not following SUDs as recommended by Environment Agency.
- Destroying the Historical setting of Grade II listed dwellings, Heritage Asset building – Victorian School, Ancient Woodland and hedging, Ancient Rolling Claylands, Ancient Monument and Conservation area and abutting.
- Local Affordable Housing –Gateway to Homechoice is the way SCDC allocates properties to rent source - www.gatewaytohomechoice.org.uk - Local people cannot over-ride the bidding system and criteria which is dictated by number of rooms for unit applying, (single person can only have one bedroomed dwelling, a young couple with two young children can only have a two bedroomed dwelling). A local applicant/s that is financially independent cannot increase priority over an applicant from another UK county; those who are not have highest priority.
- Harm to Historical setting, Visual and Neighbour amenities.
- Highways harm to safety and setting. No safe splay possible, the splay requires land and clearance that is not totally owned by the development site to one side and destroys the conservation area approach on the other (village) side, by cutting away the high banking to vertical requiring hard landscaping which will harm the visual approach to the village and is within the Designated Conservation area. Splay requirements in accordance to 'Highways Geometric Standards' document cannot be met.

The controversy and strong public interest in this proposal is not reflected by the decision for a written appeal response process.

This development does not represent sustainable development, the contribution of housing is recognised as not suitable and the public benefits do not exist, they are either non justifiable or non-deliverable. The Harm to the landscape and setting of listed buildings is recognised and cannot be mitigated.

Yours sincerely

Cllr Sue Piggott
Chair to Easton Parish Council (and Acting Clerk)

Encs.

EMERGING POLICIES –

Easton Conservation Appraisal Supplementary Policy Document,
SUDS SCC,
SHLAA Sites Consultation in Process

APPENDICIS

- APPENDIX - A** - HOPKINS QUESTIONNAIRE – OCTOBER 2013
- APPENDIX - B** -ENVIRONMENT AGENCY SURFACE FLOOD WATER MAP
- APPENDIX - C** -SCHOOL ENTRANCE ROAD FLOODING
- APPENDIX - D** -ENVIRONMENT AGENCY CONSULTEE RESPONSE AND
ANGLIAN WATER PRE PLANNING REPORT
- APPENDIX - E** -PHOTOGRAPH SHOWING HEIGHT SCHOOL FIELD FENCE
AND HOPKINS SITE LAYOUT TO CALCULATE HEIGHT IMPACT OF HOUSING
- APPENDIX - F** -HOPKINS MONTAGE OF SITE AND ADJACENT GRADE II LISTED DWELLINGS
- APPENDIX - G** -INTERNAL DRAINAGE REPORT
- APPENDIX - H** -HISTORIC HUNT KENNELS AND HARRIER HOUNDS PACK
- APPENDIX - I** -SCC CONSULTEE LETTER – NO PAYMENT REQUIRED FOR SCHOOL