



Kesgrave Town Council

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14th January 2016

Ms Liz Beighton BA (Hons) MTP MRTPI
Development Management Team Leader (South Area)
Suffolk Coastal and Waveney District Council
Melton Hill
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Dear Ms Beighton

Planning Application No DC/15/4672/OUT - Phased Development of 300 Dwellings, Provision of Land for Primary School and Associated Landscaping and Open Space with all Matters Reserved Apart from Access - Land to East of Bell Lane, Kesgrave

I refer to the above mentioned planning application and the Town Council's Extraordinary Meeting held on the 13th January 2016. Thank you for attending in an observatory capacity as a representative from the Local Planning Authority, together with your colleague Phillip Ridley. You will have seen following your attendance that the meeting room was full to capacity, with a large number of attendees. Some members of the public had to stand at the back of the room and others had to stand in the corridor leading to the room.

As statutory consultee, the Town Council, after listening to the many strong views and objections of its electorate, (with not one person being in favour of the application), and following this Council's extensive consideration of all documents, including the NPPF, NPPG, Local Plan and the Site Allocations and Area Specific Development Plan document (currently not adopted), looking at the Adastral development and other nearby applications and reviewing local and national planning policy, the Town Council now formerly recommend **refusal** of this application on the following grounds:-

- The existing low grade **road construction** of Bell Lane has deteriorated over many years with the surface breaking up, sunken ironwork and badly damaged or non-existent kerbing.
- **Access** -to and from the site via Bell Lane from either Foxhall Road to the south or the A1214 to the north. This junction between Foxhall Road and Bell Lane is already dangerous and the site of numerous minor accidents. Any additional traffic will only exacerbate the difficulty already experienced. Traffic congestion and solutions to remedy this are key at Bell Lane. The A1214 is difficult to access via traffic lights at peak periods, further hampered every weekday morning and afternoon during school term time by parents transporting children by car to and from Heath Primary School, Bell Lane and other schools in the town. Access via Ropes Drive (via Hares Grove), would be impractical. It is not recommended or practical to use the footpath through Fentons Wood as an access. (We understand that the landowners and covenant are opposed to this). The land from Long Strops to Foxhall Road is designated by the Local Planning Authority as "countryside".
- **Transport Infrastructure** – The road access is currently relatively poor. Allocation of even more housing in this area will result in an even bigger unsolved transport problem. The cross-boundary transport issues to Kesgrave need to be addressed also.

The routes in and out of Kesgrave and to Ipswich and other areas, are becoming even more congested without the addition of extra houses. Signals at the crossroads will not address the issues. It is hoped that the County Highways will be looking very carefully at the proposed schemes, to ensure that they are fit for purpose, robust and meet the County Council's laid down requirements before any "sign-off".

- The existing **street lighting** is poor and to a minimal standard for a densely developed area.
- **Safety – School Travel Plan** – this naturally covers staff children parents and visitors travelling to the school sites. The County Council will need to consider this matter with the Local Education Authority. (LEA). This Plan should aim to reduce single occupancy car trips if practicable. It should include a logical network of safer routes to school, the provision of crossings outside schools and parking enforcement outside of the schools and campaigns to encourage walking and cycling to school. Pedestrian and cyclist facilities on the approaches would be needed.
- **National Planning Policy Guidance – Promoting Sustainable Transport** – Local Planning Authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choices. This national policy will not be met by simply widening Bell Lane.
- There are no details about any provision for **recreational spaces/play** areas as part of the possible planning obligations at this Outline Planning stage. Smaller spaces are not what the town needs. One larger space will best suit the needs of Kesgrave for any viable application.
- **Adequate Green Space** – Adequate evidence is needed for improvements to local green space. It is desirable for this to be deliverable on a scale with the proposed development and as part of the application. Currently this detail is an unknown quantity.
- Clearly at this **Outline** stage, there is little detail about **Community Infrastructure Levy or Section 106**. The square metres of the proposed 300 houses are not known at this stage. It is therefore, difficult to calculate any Community Infrastructure Levy at this initial Outline stage. The Town Council is aware of how this funding is phased, but it is difficult to feel comfortable about any infrastructure promises or guarantees at this early stage, when a lot of detail is unknown.
- **Sewage System** – The sewers within the area have capacity issues with a history of flooding in both Bell Lane and Penzance Road. For the proposed growth to take place, additional investment, upgrading and consent increases would be required. The sewer network will need to be upgraded to avoid the sewerage system deteriorating significantly with the extra burden of the proposed 300 houses.
- **Doctors Surgery** and medical provision – this is already exceeding capacity levels. It is noted that £95,000 is proposed via the Community Infrastructure Levy to extend the GP Practice. However, the issue is the number of GP's in proportion to the amount of local residents, which is currently very pressurised and over stretched.
- Looking at the **Land for Education** details based on Ofsted calculations and the Adastral Park proposed development public documents would need be relied upon with regard to secondary school education in Kesgrave, as this would appear to be covered by the Adastral proposal. The Town Council is aware that of course the Local Education Authority (LEA) is being consulted. The LEA should be aware of the very strong concerns from local residents about the safety of any extension to Cedarwood Primary School being which would result in split sites. Residents are also concerned about the safety hazards of sharing a bridleway as a an access, shared with horse riders and people walking their dogs. The Head of this School and his staff have also raised their objections to a split site, on the grounds of impracticality and safety.
- The proposal is outside of the physical **2015 boundary of Kesgrave**.
- **Local Plan and associated Local Planning Authority Documents** – this application will go against local policy. It is appreciated that the Local Planning Authority will need to be mindful of national planning policy and government initiatives, however, it should not go against its own polices, i.e. the Local Plan and its Core Strategy. The Local Planning Authority will need to look at addressing the wider strategic issues with appropriate infrastructure. Although it is noted that the applicant is proposing to include 33% of affordable housing, without the infrastructure, this is purely academic, as the application is not deliverable.

The large Adastral development with 2,000 dwellings should be large enough to meet the need for more housing and to create the necessary and associated infrastructure for the surrounding road network and secondary school education provision. The Adastral development should also satisfy the Local Planning Authority's 5 Year Land Supply requirement. The proposed development of 300 dwellings, (three phases of 100 dwellings), will not be sustainable or well serviced and will only add to the restraints of the current inadequate infrastructure. The "street scene" as suggested by the applicant will not blend into the existing development. It will not merge, but will be isolated, divorced and excluded from the rest of Kesgrave and the local community.

- **Walk to Town Centre** – "The Travel Plan" details and estimated time to walk to the town centre is disputed, due to its inaccuracy.
- **Full Application (Outline Application to note)** – It is noted that potentially there will be an estimated 1,850 additional car movements or more on the public highway as a result of the proposed 300 new residential dwellings. The highway is already exceeding its capacity. Off road parking forecourts need to be addressed as the provision of garaging is not practicable. This needs to be re-evaluated by the applicant with the Highway Authority.
- If a full detailed planning application is submitted, then details about the required **infrastructure** need to be clearer. For example, timeframes, where the funding will be derived from, including for education.
- **Conclusion** – The main elements of infrastructure that are critical to the proposed development are transport, access, adverse impact on other nearby road networks, sewerage treatment, drainage, flooding, general infrastructure issues, street lighting, medical, education, lack of green spaces and overdevelopment of the town. The current and emerging Local Plan and National Planning Policy need to be considered. The Local Plan sets out a vision and a framework for future development of the area. In order to follow its own Plan, it is hoped that the Local Planning Authority will refuse this application, based on some of the issues raised above. The proposed development, divorced from the rest of the town, with a single access onto Bell Lane has no benefit whatsoever for Kesgrave, which is demonstrated by the views of local people. It is hoped that the Local Planning Authority will not depart from its Development Plan Policy. If material considerations indicate that the Plan should not be followed, then this will have to be subject to any conditions prescribed by the direction of the Secretary of State. (Appeal). (Article 32 of the Town and Country Planning (Development) Management Procedure) (England) Order 2015.

Yours sincerely

Susan Clements
Town Clerk