

SAFE Response to Application DC/19/05740- John Shepherd Road

SAFE strongly opposes this Application

This is an Application for 27 houses at the rear of the current John Shepherd development. There is no Planning Gain. Included is a large holding pit for surface water.

Policy Background

Since November 2018 when the last major Applications were heard a number of factors have moved in our favour.

*MSDC have now confirmed a minimum 5 year housing land supply. This is important as without this number a number of Planning Policies can be ignored.

*The Joint Draft Local Plan has been consulted upon and whilst not yet adopted it does carry some weight. The Plan has corrected the error of our being a " core " village . We are now correctly identified as an "Hinterland" village capable of sustaining limited development. Currently there is no timetable for the adoption of the Plan.

*The Neighbourhood Development Plan is due to go to referendum in late January/ early February 2020. Whilst not yet adopted it does carry some weight. The NDP does not identify John Shepherd as a potential development site. To include this site would push the agreed housing ceiling, of 60 houses over the Plan period, well over target. To support this Application would undermine the validity of the NDP.

* The site is not within the Settlement Boundary.

*Any potential development in Weybread should be factored in as it is integral to the infrastructure in Fressingfield. This would impact on highways, the medical centre, the school and pollution.

General

Both Applications (John Shepherd Road and Stradbroke Road) use the original reports and public consultation for the schemes considered in 2018. To rely on these reports is unsafe. For example the flood information is over two years out of date . There have been at least two floods notified since that period and several episodes of sewage egress.

Fressingfield is a small rural village of approximately 440 houses of which 350 are in the centre. There are currently 51 houses approved, but not yet built. (In addition small infill developments have been occurring at around 3 per annum) The current Applications would increase central housing by 14 %. When the houses not yet built are factored in the increase is 29%.(excluding Weybread)

This will significantly alter the rural ambience of the village setting.

Whilst there can be cumulative effects common to all development in Fressingfield. There are specific issues relating to the John Shepherd proposal.

Highways

The cumulative impact of the two developments would increase the number of cars in the village by approximately 70 cars.

Both developments would increase the strain on Jubilee Corner, especially so if the shop is relocated to Stradbroke Road. Jubilee Corner is a 5 way junction. It is proposed to improve the situation by coloured anti-skid surfacing on the road.

Review of the literature shows there are good studies on reducing skid potential when high friction surfacing (HFS) is used. The method of application is critical, there are high costs and have a high carbon footprint as they do need frequent renewal either because of wear or polishing. This has important revenue implications which need to be addressed.

Although skidding is reduced the hard evidence for accident reduction is far less certain. To assess the value of anti-skid surfacing we corresponded with Nick Lloyd, Road Safety Manager at ROSPA and Mr. Howard Robinson, Chief Executive of the Road Safety Treatment Association Ltd.. (original correspondence is available.)

The following information was obtained- - 50 metres of each road approaching a junction would normally be treated with High Friction Surfacing or anti -skid. It is less effective in snow and ice as the tyre surface has to be in direct contact with the road.

Accident reduction data are incomplete. Work done in the 1960s in London did show a 50% reduction after treatment. However these data were collected before the introduction of ABS and there are no data after their introduction. There are no data on accident reductions on specific risk sites, such as a 5 way junction(because accidents are dealt with by the police and not the Local Authority). As mentioned, the original work was done in London before ABS in an environment very different to the situation in Fressingfield.

In the Irish Government's Policy Document (DN-PAV-03024 dated 2017) it reports that high friction surfacing cannot compensate or correct adverse alignment or drainage problems. Accidents are usually the result of multiple factors and HFS may have no influence on the outcomes. The Report states " It should be noted that the adoption of HFS may encourage drivers to rely on the additional grip and consequently increase speed. The conspicuity of HFS may lead certain drivers exploiting its potential when they are aware that it offers the highest level of skid resistance. This is a constant concern for those with responsibility for highway safety. **This is a result of experience at some sites where accidents have increased after treatment.**"

Road bumps are also proposed. Many local authorities have been reducing the number of bumps because drivers accelerate each side of the bump. which increases noise pollution.

Emergency vehicles and wheelchair users have difficulties with speed bumps, they may also cause water retention on the road and subsequent icing.

The increased traffic will impact on other roads in the village. We have produced papers on congestion and pinch points as well as the large number of unreported and reported accidents fressingfieldhousing.org New Street is of particular concern as it is at the centre of the village. The War Memorial is another worrying junction being a four way junction.

On Road Parking

Throughout the area many roads have no walkways and on street parking is very common. The Medical Centre, shop, and Anglican Church all have insufficient "off road "street parking. With an increase in population and increased use of these venues there will be more parking on very narrow streets. Parking for the Anglian Church is not limited to Sundays because of bell ringing , meetings and choir practice . There is permanent on street parking on Church Hill as very few houses have off street parking this is very narrow and there are no footways in this area .

The analysis of the projected increase in traffic movements makes absolutely no reference to the projected increase in pedestrian activity. This is a serious omission.

Access to John Shepherd

The access to the proposed John Shepherd development is very difficult. Immediately before the entrance there is a cross roads, with a very narrow access on one side from which vehicles frequently reverse as there is insufficient room to turn. There are poor sight lines on both sides and beyond the cross roads there is a sharp bend as the main John Shepherd Road joins Samuel Vince Road. This will become the main thoroughfare into Back Road which in turn joins the VERY busy multi junction at Jubilee Corner. With the projected increase in vehicles the junctions will become untenable . At the opposite end of Back Road speeding down Harleston Hill into Back Road has been a long standing and dangerous problem.

Public Transport

There is **NO** public transport in Fressingfield . The buses referred to in the Application are school buses which only run in term time and there is no flexibility in the timetable. The bus company operating the school buses has NEVER known a member of the public attempt to use the service.

Local Employment

There is only a tiny amount of local employment. Part time work is available at the shop and Fox and Goose. Full time posts are at the surgery and School, although most of these full time personnel choose to live outside the village. CP Davidson, the main employer is based

outside the village. The vast majority of villagers leave the village by car to go to work in neighbouring towns. There are no cycle lanes and the roads are narrow and overcrowded. Some people commute to London, therefore driving to the station at Diss.

Medical Care

The small amount of spare capacity at the surgery will be taken up by the residents of the 51 new houses approved, but not yet built. Waiting times for consultations have already significantly increased and this will get worse. Parking at the surgery is already inadequate and more patients will result in more overspill parking in New Street. There is no space to expand the car park because of adjacent recent house building.

A new medical centre, providing a full range of services is professionally priced at £12 million. There is no funding available for either a rebuild or enlargement (which would be physically difficult). The only alternative would be funding by the developer.

Education

Mr. Neil McManus from Suffolk County Council on 7th August 2019 reported that the Fressingfield Primary School did not currently have vacancies and projected to be full for the foreseeable future. Funding would have to be found to expand the school.

Affordable Housing

A perceived major advantage of the Application is the inclusion of 9 affordable homes. Currently there are 11 families on the local waiting list these can be accommodated in the affordable home provision within the developments approved, but not yet built. Further Affordable housing is surplus to need in the village.

Green Credentials

There will be more residents all with cars as realistically there is no alternative travel in Fressingfield. This will mean more pollution and certainly is contrary to all relevant Guidance on sustainable transport.

A green field arable site will be lost. Residents living close by report barn owls and a variety of deer in the area. The churchyard is 125 metres away and 250 metres away there are breeding tawny owls, flycatchers, tree creepers, greater spotted and green woodpeckers as well as the more common birds.

Heritage

The proposed development adjoins or faces a comprehensive area of heritage buildings: Richmond House (grade 11); Knoll House(Grade 11); Coety Barn (Grade 11*)and the extremely rare, if not unique, Grade 1 stable, which is actually a medieval hall house. This

complex of historic houses form an important nucleus of some 58 listed buildings within this rare and rural historic village with architecture of the local vernacular style.

The topography of the village, recognised and safeguarded in the new Neighbourhood Development Plan, means that the proposed development at John Shepherd Road would sit on the brow of the hill and will massively impact on the rural aspect of the whole village as viewed from Harleston Hill, the main access road into Fressingfield. This will be especially marked in winter when the trees are not in leaf. The development would harm the character and appearance of the countryside and would have a negative impact on the setting of the listed buildings and would not be sympathetic to local character and history, including the surrounding built environment and landscape setting as advocated in the NPPF.

The proposal is contrary to Policy HB1 of the adopted Local Plan (1998) which states that the Council places a high priority on protecting the character and appearance of buildings of architectural and historic interest and that attention will be given to protecting the settings of listed buildings.

Flooding and Sewage Egress

Flooding and sewage egress are very serious issues in Fressingfield and of great concern to villagers. They affect the quality of life and create health issues., which have been brought to the attention of Public Health England by Suffolk's Director of Public Health.

There are two discrete, but linked issues. Firstly surface water flooding and secondly the egress of sewage onto the highways and into gardens.

Flooding

We believe that significant flooding is underreported. It occurs primarily in Low Road/Cratfield Road, but serious flooding has also occurred in other parts of the village. We know that it occurred four times in five months between 22 December 2017 and 24th April 2018 and twice in 2019. It is a long standing problem and has occurred over a number of years. (see SAFE web site fressingfieldhousing.org "Low Road historic flooding" where there are representative photos at 20 year intervals) The problem does not only occur in Winter, but also occurs in Summer (12 July 2016) .Flooding is caused by 3 factors- the overtopping of the Beck, the sewer manholes being raised and the excessive surface water running down from the high point of the village to the low point, Low Road. Fressingfield is unique in being surrounded by hills, to the east (Buckingham) west (Harleston) north (Church Hill)and south (Canser) .The soil is heavy clay and impervious. The roads themselves act as conduits bringing water to the low point of the village, eventually entering the Beck. Increased water into the Beck increases the likelihood of overtopping.

With climate change this situation would be expected to worsen. The surface water drainage strategy currently proposed for John Shepherd subject to an Holding Objection.

Sewage Egress

The sewerage was planned in the late 1930s and building was delayed because of the war. The system was completed in 1946.

The design of the system is well documented. Sewage from the current Post Mill development is pumped up hill into New Street and continues to Church Hill , down to Low Road (150mm pipe) where it joins at the War Memorial another 150mm pipe coming from the John Shepherd development. The two pipes then join and form a single 225mm pipe which runs 100yrds to the pumping station and continues along the Weybread Straight to the treatment plant in One Eyed Lane.

In Low Road, at times of heavy rainfall the sewerage manhole covers lift and raw sewage and sanitary products spill onto the road and into gardens. The contaminated water flows into the Beck to be dissipated further.

This is a very long standing problem. There exists correspondence between the then MP Michael Lord and the CEO of Anglian Water, Peter Bray. The Chief Environmental Health Officer was also involved.

The problem is becoming more common and more severe. The contamination has been such that Anglian Water have had to provide teams to clean up the debris. Sewage egress has occurred 9 times in the last 2 years.

In May 2018 Dr. Abdul Razaq, the then Director of Public health wrote " I would agree that the situation relating to sewage leaks is not acceptable and unpleasant."

The most recent incidents are well documented and the details are relevant to the mitigation measures suggested by Anglian Water.

1st October 2019 - On 30th September Suffolk County Council cleaned out all of the surface water road drains in Low Road. Four manholes were lifted and there was surface water flooding.

6th October 2019- 7 manholes were elevated the egress of sewage started at 9 am and was still flowing when it was dark. This incident was the worst contamination yet seen.

14th November 2019 - The rain was continuous, but not especially heavy. 3 manholes were elevated and the Beck over topped in two places.

27th November 2019 The rain was continuous, but not heavy. 4 manhole covers were elevated . The sewage egress was noted at 7.30am (but had obviously been running earlier) and was still flowing when it was dark.

20th December 2019- The rain was continuous , but not heavy. 3 manhole covers were elevated. Sewage egress was already heavy at 7.30am and was evident at 5.30pm. Human waste and loo paper were visible on the road and walk ways and was particularly heavy.

Anglian Water Pre- Planning Addendum Report-

Anglian Water has put forward proposals to mitigate the impact of an additional 27 houses as Anglian Water do now concede that more houses result in more sewage which in turn means there is less capacity in the system for surface water. We have concerns over the how robust the proposal for mitigation actually is?

Anglian are confident that the sewerage has capacity for baseline dry weather flows BUT surcharging is caused by the ingress of surface water from direct and indirect connections.

At present " there is no viable intervention that would enable the FW sewer network to accommodate the volume of water from a water course. Therefore the operation of the FW sewer network is reliant on all connected properties having adequate disposal route for rain water to a water course and having sufficiently robust protection against high river levels draining into the FW drainage."

It is accepted that removal of surface water egress would take several years. Firstly properties discharging to the FW sewer would need to be identified and secondly alternative disposal would have to be agreed and finally no householder is obliged to re-route their surface water and there would also be a serious issue as to who would fund this!

The report is based on inaccurate data. Quite correctly Anglian Water have looked at the cumulative impact of both the John Shepherd Application and the Stradbroke Road Application. They have assumed Stradbroke Road to be 9 houses . The Application is for 21 an additional 12 houses. The report clearly states " should the anticipated flow rates increased due to a change in the development composition, we may need to evaluate an alternative connection point or methods for controlling the discharge rate." A 33% increase in new housing numbers on the site is significant .

The new system of sensor signals activates a foul sewer valve. When the sewerage is over loaded the system is designed to hold back sewage for up to 10 hours from homes in the John Shepherd area. This will stop the flow from 105 homes (which includes the 27 new homes). Increased proximal storage for the temporary holding of sewage would be required. Herein are two problems. Will the attenuated flow for 10 hours be sufficient? At least three out of the surcharging events have lasted more than 10 hours.(there may be more, but darkness prevented examination.) The proposed 10 hour valve closure would be ineffective in the majority of cases. It is acknowledged that additional sewerage capacity is required. No evidence is produced that guarantees that the problem will not be pushed up stream. In times of normal in put, flow maybe slowed by the larger capacity and cause odour.

Anglian Water recognise that the proposal is designed " to ensure that new development does not significantly increase flood risk when the FW sewer network is surcharged". This statement implies that there is in fact a risk.

We assume that these are primarily desk top analyses and as such can be inaccurate. Our understanding is that accuracy cannot be certain without knowing the volume of ingress and it is difficult to allow for the severity of weather conditions " the solution will also provide the facility to gather more accurate information on sewer performance that will enable further investigation to the causes of surcharge condition" as such it must still be regarded as experimental with no guarantee of success. We would suggest that the existing problems are resolved **PRIOR** to any additional development.

This objection from SAFE gives many reasons why further significant development should not occur in Fressingfield, primarily because of lack of sustainability.

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