

## **MOULTON PARISH COUNCIL'S RESPONSE TO PLANNING APPLICATIONS DC/25/0623/FUL AND DC/25/0624/HYB**

Moulton Parish Council OBJECTS to this application for the following reasons:

### **Planning Policy**

The newly adopted West Suffolk Local Plan categorises Kentford as a type A village due to its limited services and facilities.

The land Lanwades Park is on is classed as countryside in the Local Plan as it is outside the housing settlement boundary. As West Suffolk Council will meet its 5-year housing supply, there is no requirement for such a large number of homes on land not allocated for development.

Kentford has already had a large amount of development. This development will dramatically increase the size of Kentford and will lead to an unacceptable level of overdevelopment in a rural village. The site extends to School Road and will urbanise land which contributes to the rural nature of the area.

The site is within Moulton Parish which has been classified as a Local Service Centre in the Local Plan with an indicative number of 30 homes well below the 860 proposed in these applications.

### **Class E and Brownfield Land**

The summary of benefits produced by the applicant states *'the effective and optimal use of a brownfield site in class E in a sustainable location.'*

Moulton Parish Council believes that this statement is misleading for a number of reasons. Class E and brownfield are not the same thing. The entire site is Class E. The entire site is not brownfield. Class MA permitted development rights allow for change of use of class E buildings to residential (class C3). However, prior approval is still required, which at the time of writing has not been granted and half of the buildings have been withdrawn due to ineligibility.

Brownfield refers to previously developed land. The NPPF defines brownfield land as *"Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed."*

Only part of the former AHT site where the existing buildings are is brownfield; curtilage must be restricted in size, intimately associated, and not merely functionally linked.

### **Sustainability**

Active Travel England states in its report that estimated trip generation is required for all modes of transport (walking, cycling) not just vehicles. This information is not provided by the applicant nor are specific targets to reduce vehicle trips. The travel plan predicts that 88% of trips will be by car which Active Travel England is concerned about as it suggests a development dominated by private car use.

Such dependence on cars makes the site an unsustainable location in terms of promoting increased walking and cycling. The walk to nearest primary school in Moulton is 2.4km which is beyond the maximum reasonable walking distance and significantly beyond that which is classified as a walkable neighbourhood (800m). It also needs to be recognised, that even when parents could walk to school many don't or are unable to as they drop children off on the way to work.

Parking at Moulton School is already chaotic and dangerous. Although there are 30 spaces in the car park, this is not enough with cars parking along the verge on School Road, parking farther into the village or dropping off using the drive through accessed on Kennett Road. The area is often

gridlocked as cars try to enter and exit the narrow entrance to the car park. If there is a tractor or delivery van in the road, cars often have to reverse 100 yards with children all around.

Kennett Station is 1.7km from the site which is within walking distance for some but not for many. Whilst the applicant is looking to improve cycle and pedestrian links from the site to the Bell Inn junction, without improvements from the junction to the station, Station Road is not a safe route for pedestrians or cyclists. There is currently no safe crossing along the B1506 to access Kennett Station from the site. Active Travel England states that a high-quality route to the station is essential, however footway widths along Station Road fall below the recommended 2m. It is also poorly lit and overgrown. The footway is definitely not wide enough for pedestrians and cyclists to share it as it is barely wide enough for a pushchair.

Moulton Parish Council does not agree with the following points in the Transport Assessment:

- There is NOT a regular train service from Kennett Station. The Planning Statement states that the location is sustainable because of the regular train service. It claims that there are trains every 40 minutes from Kentford to Cambridge and Ipswich. This is incorrect. Trains from Kennett to Cambridge run Monday – Friday at 05.53, 7.05, 7.42, 9.08, 10.09, 12.09, 14.09, 16.09, 17.09, 18.09 and 20.09. Trains to Cambridge to Kennett and Ipswich are at similar intervals.
- There is already insufficient parking at the station for existing users without the 860 homes detailed in this application and the homes in the new Kennett Garden Village. Cars already overspill onto verges.
- Cars, pedestrians and cyclists all have to access the station via a shared entrance which poses a safety risk to vulnerable road users. There is no safe crossing for pedestrians and cyclists near the railway bridge by the station.
- There is insufficient bike parking at the station.
- Trains cannot accommodate existing numbers of passengers from Kennett. The trains are often overcrowded especially at peak times with passengers having to stand from Kennett and Newmarket to Cambridge.
- National Cycle Route is not a safe cycle route to Newmarket. Sustrans design guidelines for a National Cycle Route state:

*Where the National Cycle Network is not traffic-free it should either be on a quiet-way section of road or be fully separated from the adjacent carriageway.*

*For Network route on a quiet-way section of road, the traffic speed and flows should be sufficiently low. It should have good visibility to comply with design guidance for comfortable sharing of the carriageway.*

Moulton Road (from Moulton to Newmarket) is a fast straight road with the National Speed Limit and not suitable as a cycle route under current Sustrans guidelines. To connect to the route cyclists would have to use Kennett Road or School Road. The speed limit on both roads is 60mph. School Road is a narrow road with passing places and limited space to pass pedestrians and cyclists safely especially as many vehicles travel at unsafe speeds, making it dangerous for all but the bravest cyclist. In addition to this the roads and footways are in poor condition and poorly maintained, with regular potholes, making walking and cycling even more dangerous.

When Moulton Parish Council carried out a speed survey in 2024 residents said they did not feel safe using Moulton Road to connect to the local footpath network because cars drive too fast, nor would they cycle to Newmarket even though it is only 3 miles away.

There is not a regular bus service as acknowledged in the Transport Assessment.

The applicant is offering a shared path between the site and Moulton Primary School. Whilst this is something Moulton Parish Council would welcome; there is some doubt as to how this will work given the limited space on either side of School Road. It is questionable that SCC Highways would approve the path due to this lack of space, therefore the provision of this path is not guaranteed. It is also part of the hybrid application and will not benefit residents on the first phase of the site.

Active Travel England states that walking on a footway next to a road with the National Speed limit is not a pleasant experience, let alone for cyclists sharing the road with cars travelling at speeds of 60mph or more.

The Planning Statement for the full application states that the addition of Kennett Garden Village makes Kentford sustainable because of the facilities that will be on offer there. Moulton Parish Council does not agree with this as people would use their cars to access the facilities on this site, especially as there is not a safe cycle route and it would be too far for most people to walk.

### **Negative impact on existing businesses**

The site encircles Lanwades Hall which is a thriving events venue, focusing in particular on weddings. Lanwades Hall is an established business which employs up to 30 people locally and in addition supports other local businesses such as caterers and florists.

The appeal of Lanwades Hall as a wedding and conference venue is its quiet location within a beautiful parkland setting. This will be completely destroyed if it is enclosed by 860 new homes, some of them within 40m of the hall. The proposed primary school will also adjoin the boundary. Lanwades Hall is also a listed building whose setting would be negatively impacted by being enclosed by such a large development.

Even with the noise mitigations proposed in the application, with an estimated construction period of several years, the noise impact from this work will undoubtedly affect the business as it seems unlikely that anyone would want to book a wedding when there are high levels of background noise. As weddings are held throughout the week, it is difficult to see what mitigation could be put in place.

Lanwades Hall has an event's licence which allows it to hold events with music outside. This will inevitably generate noise. This is currently not an issue as it is far enough away from existing properties in Kentford. We were told at the meeting with Lochailort that no properties would be built on the boundary of Lanwades Hall when several will be. This could lead to noise complaints which would have an impact on the business. Although this has been mitigated to some extent by glazing, during the summer months when people are outside and windows are open, there is nothing that can prevent the noise from carrying. Moulton Parish Council believes that existing businesses should be protected and not compromised by this development.

Lanwades Stud also adjoins the site and will be negatively affected by the development.

### **Loss of Employment Land.**

The AHT site employed over 250 people. There is potential for this site to be used by a range of possible services within Class E which could provide local employment.

### **Pressure on local infrastructure**

#### **Schools**

The catchment school for the development would be Moulton Primary Schools which is already oversubscribed and would be under pressure until the primary school is built if the second phase goes ahead. The response from Suffolk County Council's Development Contributions Manager gives details of £106 contributions which the developer would need to pay. It states that Moulton Primary School is forecast to exceed 95% capacity, therefore there would be insufficient capacity to accommodate the primary-age pupils arising from the development proposal. Local provision would need to expand to accommodate 89 primary places.

As detailed above, there is already insufficient parking for the current level of pupils without the addition of 89 more places.

The applicant states that Kennett Primary School is nearby but it is in Cambridgeshire not Suffolk and is not the catchment school. The assumption is that priority would be given to children in the catchment area in Cambridgeshire.

The catchment secondary school in Newmarket is also forecast to exceed 95% capacity. 42 secondary places would be required.

The forecast for Early Years provision is a deficit of 16 places in the Kentford and Moulton ward. The strategy is for new build facilities to be provided to serve the development offering 30 places. Land would need to be provided and agreed by the applicant and a feasibility study required with the cost of the study borne by the applicant.

### **Pressure on GP and Dental Services**

GP and dental services are already overstretched. The nearest GP and dental surgeries to Moulton are in Newmarket. The addition of 860 new homes will put existing GP surgeries under increased pressure and lead to more traffic driving into Newmarket. The NHS dentists in Newmarket are also full and not taking on new patients.

### **Roads**

The junction near the Bell Inn is dangerous and the site of numerous accidents. The application relies on the fact that there will be a new roundabout built as part of the Kennett Garden Village application, but to date there is no sign of this roundabout and no date for when it will be built. Until/unless it is built, the addition of more vehicles will add to the pressure on the junction, especially at peak times.

The applicant's assessment is that there will be no adverse impact on the operation of existing junctions however this cannot be true as it has already been recognised that there is a need for a change to the junction at the Bell Inn as a result of the Kennett Garden Village development. This application will be providing significantly more homes than Kennett Garden Village (500).

The application states that businesses in Newmarket will benefit from the increase in population and that building the homes will help local businesses thrive. Moulton Parish Council does not agree with this. There is already insufficient parking in Newmarket, without having to accommodate additional people. The roads into Newmarket are regularly grid locked particularly at peak times. Likewise Bury St Edmunds is regularly grid locked at peak times. The impact on the Horse Racing Industry in Newmarket also needs to be considered with the increase in traffic going into Newmarket.

The application states that only 11% of vehicles will travel into Newmarket. This figure is questionable as the nearest shops; GP surgery and catchment secondary school are in Newmarket all of which will generate vehicle journeys in addition to any trips for employment. The Newmarket area does not have the road infrastructure to support increasing numbers of traffic.

Whilst residents may use the shops in Moulton and Kentford initially, this could reduce once the shop has been built on the site and may even draw customers away from them resulting in a negative impact on existing businesses.

The B1506 is the official diversion if A14 is closed (which it is regularly overnight for repairs and due to accidents). Closures of the A14 put extreme stress on the road already and particularly Bury Road which was not designed to accommodate such a high level of traffic and in particular HGVs.

### **Boy's Grave Junction and Norwich Road**

Boy's Grave junction is a regular accident blackspot. Traffic levels, particularly from HGVs, have increased dramatically since a weight restriction was put on the bridge in Station Road, Kennett.

Vehicles use Norwich Road to exit the A11 and link in with local roads. The road is narrow and in a poor state of repair with numerous potholes and eroded verges. It struggles to accommodate the current level of traffic without the addition of traffic from this development and more concerning, construction vehicles.

The slip round westbound on the A11 is short and dangerous. As the A11 is already extremely busy. Cars often have to stop and wait on the slip road. Vehicles from the site would either have to use Norwich Road or go through Newmarket to get to Cambridge putting additional pressure on the A11 slip road and therefore increasing the risk of collisions. The alternative is to drive through Newmarket to get to Cambridge increasing the pressure on the roads in Newmarket.

As traffic cannot access the A11 to join the A14 eastbound, the only route toward Bury St Edmunds is through Kentford village putting increased pressure on Bury Road which is already busy.

#### **Flooding on the B1506.**

There is regular surface water flooding on the B1506 outside the Lanwades Park site. There have been unsuccessful attempts to resolve this to date. When surface water is present, the road is extremely dangerous as vehicles move onto the other side of the carriageway to avoid the surface water.

#### **Sire Lane**

Sire Lane is a narrow, block paved, unadopted road not intended for use as a permanent access to the Lanwades Park site. When the AHT site was open, it was used as a secondary access to the site, with use limited to opening hours. Sire Lane junction has a shallow visibility splay; it is unmarked and unlit and not able to accommodate an additional 175 cars accessing the properties on the proposed development.

#### **Private roads on the site**

The application says that the roads on the site will not be adopted. West Suffolk Council Waste Services state that their Waste Collection service will not collect from private/shared roads, therefore bin collection points for all roads need to be shown. These need to be kerbside at adopted roads. Since the nearest adopted roads is the B1506 are residents expected to take their bins to these points, assuming that there is space for bin collection points for 860 new homes? This is impractical and could impact on visibility splays at the entrances to the site.

#### **Car parking**

12 spaces have been allocated for the community building and 8 for the shop. Visitor's parking has been allocated on a basis of 1 space per 4 dwellings. Whilst this may meet minimum parking standards, Moulton Parish Council does not feel that such a low number of parking spaces will be sufficient. It is questionable whether the parking at the shop will be able to accommodate people living on the site and people coming onto the site to use the shop. Moulton Stores regularly has several cars parking on the road outside and the Tesco in Red Lodge does not have enough spaces for people wanting to park there.

The allocation of 12 spaces for the community building is also too low. Moulton Village Hall has a similar number of car parking spaces and this has proven insufficient, especially when there is an event or exercise class forcing people to park on the road.

The provision of 1 visitor's space per 4 houses is also too low, especially at the weekend when people generally have visitors. As residents will be reliant on cars, it is likely that most will have two cars at least leaving no additional space for visitors. A visit to any new housing estate will show that car parking is always at a premium with people parking on pavements and other unsuitable locations.

#### **Drainage and sewerage network**

Anglian Water has flagged up an issue with foul water drainage on the site. Their response states *There are assets owned by Anglian Water or those subject to an adoption agreement within or close*

*to the development boundary. The site layout should take this into account and accommodate those assets within either adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developer's cost. These works would normally be completed before the development can commence.*

Kentford Residents have voiced concerns in their responses about the additional pressure on the water and sewerage network in Kentford with low water pressure already an issue. There have also been sewage leaks in Kentford.

### **Affordable housing**

Although there is provision for affordable housing in the application, it does not meet West Suffolk Councils affordable housing criteria in terms of the mix of housing (SP17) including flats and bungalows. The size of the affordable homes does not meet National Described Space Standard and the application offers only 5% of wheelchair accessible homes, not the required 13%. The affordable homes are also not dispersed evenly with the site. Some of the buildings will not qualify for Vacant Building Credit as claimed by the applicant and there are no self-build plots which are encouraged on developments of over 100 homes.

The applicant told Moulton Parish Council that the affordable homes would be allocated to people with a local connection, however this contradicts what Moulton Parish Council has been told previously by West Suffolk Council, that affordable homes are allocated to people on the general housing list, unless it is a rural exception site, when homes would be allocated to people with a local connection.

In addition to this no information is given as to whether the affordable homes will be genuinely affordable for the local community when house prices are already high.

### **Impact on residential amenity**

The impact on the residential amenity of existing properties in Kentford during a prolonged construction phase is unacceptable in terms of the noise, dust, and amount of construction traffic generated.

### **Impact on a listed building**

Lanwades Hall is a historic building surrounded by parkland. Loss of this land would have a detrimental impact on the setting of this beautiful listed building.

### **Environmental and ecological concerns.**

At a time when nature and wildlife are struggling, the loss of parkland, paddocks, hedgerows and mature trees will have a devastating effect on wildlife. An assessment of the trees on the site should be carried out to ensure that valuable trees are protected with Tree Preservation Orders to prevent future harm.

### **Community facility**

Moulton already has a village hall and does not have the capacity to take on any additional responsibility. It is already a challenge finding volunteers to existing buildings such as Moulton Village Hall. An old listed building would be costly to run and expensive to repair, money that Moulton Parish Council does not have. Kentford Parish Council does not have the resources either to take on responsibility for the community building.

### **Additional comments**

For an application of this size, it is disappointing that the applicant did not feel the need to engage with Moulton and Kentford Parish Councils at a much earlier stage. The 'public' consultation was also completely inadequate. A number of 'public' exhibitions were organised but people had to book to attend. One of the dates was cancelled as well.

The applicant also failed to engage with West Suffolk Council's Housing team about their affordable housing requirements and has therefore given incorrect information in their submission.

Some of the other information provided by the applicant is inaccurate or inconsistent, for example there are references to Newbury in the documents and Kentford is referred to as a town, not a village. These inconsistencies and other inaccuracies throughout the planning documents make it difficult to know which bits of the documents are correct or just copied from another document, something which some of the statutory consultees have made reference to as well.

Whilst it is clear that attempts have been made to produce designs of good quality homes, this may change once the site is sold on to a developer. There would also be high management costs for the site because the roads will remain unadopted and become the responsibility of a management company.

### **Conclusion**

This application does not conform with West Suffolk Council's Local Plan. Kentford is a rural village and would be the victim of massive overdevelopment if planning permission is granted. Local infrastructure is struggling to cope already without the addition of 860 homes in an unsustainable location. The negative impact on existing businesses, in particular Lanwades Hall and Lanwades Stud is in itself sufficient grounds for objecting, however the loss of beautiful and valuable parkland and green space cannot be justified at a time when we need to be protecting the countryside and providing safe habitats for wildlife.