

Matter 16: Proposed site allocations- Medium Villages: KEN.M1  
 Relevant Policies- LP3, site allocations and relevant development management policies Issue 1: Kennett Garden Village (application reference 18/00752/ESO, June 2018)

### **Kennett Action Group Hearing Statement**

This statement addresses all the questions to be raised.

#### **A. Summary**

1. *"The application is unsustainable (and) has been submitted ahead of an Inspector's finding for East Cambs Local Plan. (Herringswell PC). "It is inappropriate to bring this application forward now when the 2018 submission Local Plan remains under examination by the Planning Inspectorate" (Campaign to Protect Rural England). Objections to the current application have included: Herringswell, Moulton, Kennett, and Kentford PCs, Newmarket Town Council, Suffolk and Cambridge CCs, Network Rail.*

2. Only 20% of residents support the development. It is not "community led". The number and detail of objections from the community (LP5) is much larger. The Kennett Action Group (KAG) petition "No to 500 Houses" was hand signed by 156 villagers, and delivered to ECDC. An additional online petition at change.org ("*No to 500 houses in Kennett*") was organised by Kennett Action Group to facilitate signatures and the space for personal comments. This had 290 additional signatures, many with personal comments, and was delivered to ECDC. Principal concerns are based on the 4 times over expansion of the village and the large increase of already dangerous traffic.

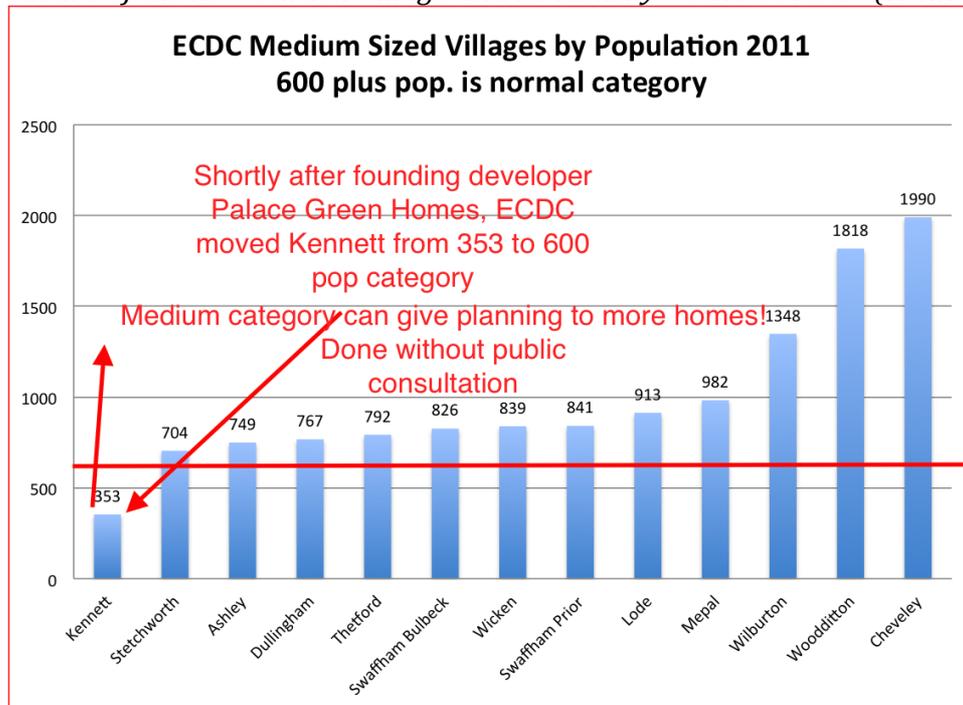
3. Sustainable, lasting solutions to highways' dangers and infrastructure have not been proposed by the applicant. The unmet infrastructure road requirements, include the increase in HGV traffic, dangers and bottlenecks at the Bell Inn, the A11, the school and the one-way railway bridge. Neighbouring authorities, (such as Newmarket and Forest Heath) have already objected. (Policy LP5, 8: highway safety). Even the application's Transport Assessments predict peak hours queues of 47 to 61 vehicles at the B1085/A11 junction, and that the Bell Inn will have a queue length of 24 vehicles on Station Road. No negotiations with adjacent objecting Local Authorities and Highways (including those in Suffolk who share the traffic dangers) have been completed, and no infrastructure funding has been financed. Amazingly, *"the B1085 is a designated local Heavy Commercial Vehicle route on the Cambridge Advisory Freight Map and has higher than typical heavy goods vehicle (HGV) percentages for this type of road". (Transport Assessment).* ECDC only addresses the symptoms, and not the cause, to meet their targets. The only real solution will be an A11/A14 link. The law of "unintended consequences" means that ECDC will surround 1,150 new residents with the dangers of 2-way single traffic HGV acceleration from the roundabouts, pollution, noise and chaos.

*"The NPPF at Section 4 promotes sustainable transport. A comprehensive assessment of highways and transport issues is required as part of any planning application with significant transport impacts. This will include consideration of*

*pedestrian and cycle provision, public transport, rights of way, air quality and highway provision. Cumulative and cross-border impacts on the highway network require detailed consideration-particularly with regard to the growth in FHDC.” (Suffolk CC)*

## B. Detailed Objections

**1. Settlement Hierarchy (LP3):** Kennett has 152 houses and 341 villagers (2011 Census), and is one of the smallest villages in East Cambridgeshire. A proposed build of 500 houses would constitute a 312% increase to a small rural village and would totally change the identity of the village. *“This site is very large for the current village, which has 152 houses, to absorb (a 330% increase). ECDC outlined in the local plan of 2015 that they want to spread the development across the district on a pro-rata basis but this definitely exceeds normal development proportions by some margin. There is considerable strength of opinion in the village that this growth is disproportionate and unreasonable. If the development were to go ahead the current village would possibly become little more than a suburb of the new Garden Village and its identity would be lost.” (Kennett PC)*



An inconsistent approach has been adopted by ECDC in deciding the Settlement Hierarchy (SH) (ECDC document: *Settlement Hierarchy In East Cambridgeshire, ECDC November 2017*). Kennett has been reclassified, from a small village in the 2015 plan, to a medium village, without any improvements to the infrastructure of the village, roads or train services. The SH is not justified, as it is not clear that the SH has been defined rigorously. This is because of the relative balance between the quantitative and qualitative ‘scoring’ terms. Qualitative, subjective, ‘facilities’ scorings are given far more weight than the quantitative population scores. The Kennett qualitative score (9 out of the possible total 30 points) has promoted Kennett into the “medium” category. This includes a “3” for Public Transport, regardless of the dangerous road infrastructure, which deserves no more than a “1”. There are no direct rail services to London, and the commuter

peak hour service to and from Cambridge is often full, including school children. Trains to London are taking up to 2 hours with the new timetables, and the service only runs every 2 hours. Longer trains are not possible due to the limited length of the platform. Villagers report having to take expensive taxis from Cambridge to get home. *“The current service frequency of the public transport services and quality of the bus stop facilities are relatively poor” (Applicant’s Transport Assessment)*. Just reducing Transport to a 1 score brings Kennett back to the “small village” category.

Settlement Hierarchy: Facilities Kennett	Score
Retail	0
Employment	2
Community	2
Sport/Rec	1
Schools	1
Public Transport	3
Total	9

There is a “1” for a school which only gets 24 of its 95 students from Kennett. Many have for several years come from Red Lodge in Forest Heath, Suffolk. In fact, Kennett students do not need a larger school, nor does ECDC (for East Cambs students). The ‘Community’ score “2” is also questionable as, at the time of rating, there was no village hall in use, and the Parish Council meeting has for many years been held in the school.

The base rationale for a medium village classification is a population in excess of 600, which Kennett is well below. So ECDC have adopted this “qualitative” additional points system, which takes no account of the amount of houses or population, and is not rigorous enough to justify such a dramatic switch. The small population should be given a higher relative weight during this process.

**2. Conflict of Interest.** ECDC are the purchasers, developers and also the planning decision makers of this proposed development of 500 houses. The community has no trust that ECDC will treat this development with any impartiality. The developers Palace Green Homes Plc., incorporated in March 2016, are ECDC’s subsidiary. ECDC has taken out a £5m loan (£300,000 a year at the agreed 6% interest, since 2016, so interest to date totals at least £900,000). There is therefore considerable financial pressure on ECDC to grant planning permission for Kennett, especially as Palace Green Homes Plc. lost £405,000 of taxpayers’ money for the year to March 2017 (this will be much higher now).

### **3. The Community Land Trust**

*(Please Refer to KAG’s Hearing Statement Matter 12 for details.)*

KCLT is not representative of Kennett Village, contrary to Policy LP5. More villagers object to the development, than are members of the CLT. Only 75 CLT members supported its latest vote in November 2017, representing only some 20% of residents (and not all CLT members actually reside in the village.)

185 residents objected to the development to the Kennett Parish Council, who received the following petition in January 2017: *“We the undersigned are concerned villagers who urge our Parish Council to act now to disagree with the proposed size, location and design currently being considered for Kennett Village”*. ECDC received and logged some 200 objections to its Second Draft Plan for Kennett in 2017.

There were 136 CLT members in October 2017, yet only 75 supported the development. Kennett Action Group delivered to the Inspector objection signatures from 156 villagers, who do not want a 500-house build and have no confidence in the CLT. An additional online petition at change.org (*“No to 500 houses in Kennett”*) reached 290 additional signatures, many with personal comments.

KCLT does not represent Kennett	Numbers
CLT members vote	75
Residents Paper Petition objectors	156
Additional Online Petition objectors	290
2011 Census	341

### Policy LP5: Summary Objections

The development is not in compliance with Policy LP5 because:

1. It is not genuinely Community led and does not have general community support *“There is considerable strength of opinion in the village that this growth is disproportionate and unreasonable” (Kennett PC)*
2. It was not initiated by the community, but by ECDC
3. There is no evidence of Kennett demand for further affordable homes. Kennett already has 25% affordable homes, already higher than the national average of 18% (Kennett Parish Council)
4. The site and scale of development is not well related to a settlement listed in Policy LP3 (Inconsistent Settlement Hierachy analysis by ECDC)
5. There are fundamental constraints from Green belt notation Grade 2, and highway safety risks stated by all objectors and adjacent communities, CCs and Town Councils

**4. Sustainability** The proposed increase in housing is not in conformity with the National Planning Policy Framework (NPPF) with regards to the core principles of delivering sustainable development. Given that Kennett is a small rural village, it is not a sustainable location for growth of the scale proposed.

The new development proposed in the plan will quadruple the number of households in Kennett. Traffic dangers and air pollution will increase exponentially, and green spaces will be reduced. Much of the green land in Kennett is already inaccessible to the community and wildlife. This has been caused by the Kennett Hall Quarry and the contaminated land of the previous landfill site, both to the north of Dane Hill Road. The Quarry site has applied to extend its operations with a recycled aggregates processing plant, which will add

to the lorry traffic on the roads. Villagers are not allowed to walk on the 97-hectare farm development site.

*“This is a green field site. This application is opportunistic and will result in the loss of a large area of best and most versatile, grade 2 agricultural land. It is clear from the current layout proposed in this application, that the developer has no intention of only providing 500 homes on this site.” (Herringswell PC)*

*“Significant Loss of Grade 2 agricultural land. This application will result in the loss of a large area of best and most versatile agricultural land. Only fen land is graded higher at Grade 1. Given the looming threat of loss of large areas of fen land to sea level rise, it is now even more important not to build on such large areas of high quality land.” (CPRE)*

**5. Traffic and Roads** This has for many years been the major concern of villagers. Amazingly, *“the B1085 is a designated local Heavy Commercial Vehicle route on the Cambridge Advisory Freight Map and has higher than typical heavy goods vehicle (HGV) percentages for this type of road”.* (Applicant’s Transport Assessment). The B1085 through Kennett is used as a rat run for cars and HGV’s between the A14 & A11 with up to 4000 traffic movements a day. This would double if the 500 houses were built. Traffic is forecast by Kennett Action Group to double to 8000 movements through the village every day. The B1085 is unsustainable for a project of this size.

*“The B1085 is unsustainable for any significant increase in traffic numbers, the Bell at Kennett Road junction is already suffering serious congestion at peak hours, and until a link road is constructed from the A11 to A14, any large scale development at this location will have a dramatic and dangerous effect on the future of the surrounding rural communities. This site is 97.5 ha and is therefore likely to expand to 2000 dwellings.” Moulton PC (Suffolk)*

*“The B 1085 carries excessive traffic because there is no A11/14 interchange. Increasing development in Kentford, as a primary development village in FHDC, is already exacerbating this usage. A further 500 residences will bring another 2000 movements per day.” (Kennett PC)*

A link at [kennettvillage.co.uk/index.php/en/village-plan-archive](http://kennettvillage.co.uk/index.php/en/village-plan-archive) is available to the Kennett Village Plan 2008 pdf. This plan detailed villagers’ traffic concerns, with maps and illustrations. Funded by Cambridge ACRE, it was presented to ECDC. It was returned by 66% of local residents, to provide statistically reliable data. HGV traffic was seen as a major problem. 95% objected to traffic noise, and 78% supported a restriction on the weight of vehicles. 49% wanted lower speed limits. Since that time, traffic levels have increased substantially. Nearly 1,000 3 axle and larger lorries will cross the one-way railway bridge. This size lorry can exceed 20-tonnes on the bridge. However, no amelioration to the major traffic problems has been undertaken in this past decade. This underlines villagers’ concerns that road infrastructure will not be improved for this development.

Serious traffic dangers already exist at:

The **Bell Inn** crossroad junction, jointly controlled by Suffolk and Cambridge Highways: a major danger from HGVs turning. The Bell junction currently has queues at peak times in excess of 15 minutes stretching back through the village. *"I observed the (Bell Inn) situation on several occasions and saw that the long vehicles often need to take up the whole road widths to make the turn, which is potentially dangerous and inconveniences other road users (including pedestrians and cyclists..."* (Inspector Alan Boyland Inquiry report for Forest Heath District Council)

The Bell junction has hardly any flexibility for improvement. Listed buildings stand on each side of it. The proposed mini roundabout itself is squeezed into the small space available, and is no long-term solution. *"Junction capacity assessments carried out for existing junctions within the study area predict capacity issues at the A11/B1085 off-slip junction, the Bell Inn Crossroads and the slip lane junctions of the A11/A14 Junction 38 ((Applicant's Transport Assessment).* No cash, investment or government finance is available from ECDC, or other government bodies, for an A11/A14 relief road (budget estimated at £20 million), which is the only real solution to the problems. *"That solution does not lie in a roundabout at The Bell. It lies in the completion of the trunk road system in the area by providing a short link between the A11 direct onto the A14, just on the edge of this proposed development. This particular section of the trunk road system is at the end of the much heralded and well-funded Oxford/Cambridge link, and will clearly become more significant in national plans of the future."* (Kentford PC)

**The railway bridge:** the single-track railway bridge, built 1889, is restricted to one-way traffic because of lorry weight concerns. The one-way HGV traffic and traffic lights block access to and from station, and create a traffic bottleneck. *"Bridge CCH/1121: this bridge is relatively narrow, with a traffic-light controlled one-way system currently in place, and traffic flow in the area might benefit from replacement with a wider structure, at the developer's expense. NR would welcome a discussion with the developer about this structure. Network Rail wishes to object to the application ..."* (Network Rail)

The **primary school:** (parking for children's access creates a 1-way system, with HGV dangers, and noise pollution. The small primary school is situated on the B1085 and directly opposite the proposed build. *"When walking along the narrow footway .. south of Kennett School, I experienced the effects of being passed at very close quarters and at speed by large vehicles. As well as the unpleasantness of the noise and wind rush, I felt vulnerable and intimidated by the lorries. Such feelings would .. be even more pronounced had I been accompanied by young children... parties of school children have to walk along here to reach the playing field for games lessons and sports activities. The combination of parked cars ..parents and young children on foot and cycles, and large lorries passing (some at considerable speed despite the advisory 20mph speed limit) gives rise to understandable safety concerns."* (Inspector Alan Boyland Report, FHDC)

The **roundabout from the A11** access (west of Village). Much more traffic will be coming down the hill on this dangerous stretch from the A11. There is only a

60mph speed limit, causing the lorries accelerating downhill from the roundabout to swing across the centre of the road. (Applicant's Transport Assessment expects heavy queuing here with the new development).

### **Traffic Accidents**

There were 40 reported accidents on Kennett's B1085 from 2007-15. 9 serious, and 2 sad fatalities. This is on the short section of road to access the 500 new homes. In December 2016 a young boy was hit by a van, as emergency services' records indicate.

**6. Undeliverable Infrastructure** The developer is believed to have set aside a relatively small amount of money (£2.5 million, or £5,000 per home) for the entire infrastructure. This includes a service road around the back of the proposed site, roundabouts and traffic calming measures, a water treatment plant as there is insufficient sewerage in place in the village (the pipes for this will be carried underground to Newmarket and cross border), a school (estimated cost £8m), and village green. There is nothing in the plan for communications strategy and infrastructure for so many homes and businesses (mobile phone masts, cable TV, or fibre optic networks). Funding is not available as cash from ECDC and its developer, and may not be available as any construction takes place. This has been further restricted by the "Teckal" Directive, which restricts ECDC from raising private capital. ECDC would be unlikely to cover the cost of the infrastructure, which would make the project undeliverable and unsound.

There is a strong feeling of the majority of villagers, that they are being ignored by ECDC and the CLT. No professional, objective, villager opinion survey has been commissioned. Updated images of traffic and roads are available at Facebook/Kennett Action Group. These include recent traffic videos.

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