

MATHS

Moggerhanger Acting Together for Housing and Safety

For the Consideration of Central Bedfordshire Council

Planning Issues Relating to Moggerhanger and Chalton

1.0 Introduction

1.1 An Action Group was established to consider local planning proposals following a very well attended meeting of residents from Moggerhanger and Chalton on 29th June 2014. This had been called by the Parish Council at its meeting on 16th June following concerns raised about the Planning Application for 18 dwellings on land at the rear of The Guinea public house. Villagers asked the group to review local planning documentation and consider Planning Application CB/14/01818/FULL in the context of Central Bedfordshire Council's (CBC) strategic plans and Local Development Framework.

1.2 The Action Group was named MATHS and comprised the following villagers, although they were also able to call upon a wide range of additional expertise from the village and farther afield as and when needed:

Mr Lawrence Ashbridge, MBE, QCVS, Retired Army Major

Mr Christopher Bashford, Consultant Engineer

Mr Jean-Pierre Brun, Information Scientist

Dr. William, Hollington, General Medical Practitioner

Mrs Carolyn Lister, Research Scientist and Legal Compliance Manager (Secretary)

Professor Richard Parish, CBE, HonFRPharmS, Professor of Public Health (Chair)

Mr Christopher Smith, Project Risk Assessor and Insurance Underwriter

2.0 Anomalies or Inconsistencies in Planning Documentation

2.1 Mid Bedfordshire District Council Local Development Framework (February 2008)

Under the section 'What sites is the Council looking for', paragraph 5 and the subsequent option appraisal states:

- "The Core Strategy indicates that allocations will mainly be made in large villages and **only exceptionally in small villages**".
- In each of the four options for Moggerhanger, the District Council said "Moggerhanger is identified in the emerging Core Strategy as a small village. Allocations will **only be considered here if there is an exceptional need for development**". There is no evidence of such a case being made.
- CBC subsequently reinforced these points in 'Talk to Central Bedfordshire' (www.talktocentralbedfordshire.co.uk/parishes/moggerhanger.htm)

2.2 CBC Site Assessment Technical Document - Appendix 2b (undated)

Page 115 states the following:

- 'Access onto the A603 requires careful assessment of **visibility**' (comment from Highways Authority)
- RAG rating is **amber** due to noise from road and public house (comment from Environmental Health)
- RAG rating is **amber** – waste water capacity upgrade is required (comment from Anglian Water)

2.3 CBC Sustainability Appraisal Report (December 2009)

Page 37 states the following with respect to Site H154 (Land to the rear of The Guinea):

- It is noted that existing **"services in this village are poor"** and therefore the achievement of building sustainable communities objective may not be actively supported.
-consideration should be given to **enhance existing and/or providing new service** provision.

2.4 Planning Application CB/14/01818/FULL

- Although mentioned as a key issue in the Site Assessment Technical report, noise from the road is not mentioned in the Planning Application.
- The Highways Authority also made no reference to visibility and access in response to the Planning Application when entering the A603, despite this featuring as a concern in the Site Assessment Technical document.
- Although given an Amber RAG rating in the Site Assessment Technical document with regard to waste water drainage, Anglian Water (AW) did not raise any concerns about the Planning Application. During a discussion with Catherine Mcardle at AW, she confirmed that the Planning Liaison Department does not consult with the Complaints Department in responding to planning applications and was therefore unaware of the numerous complaints about drainage and low water pressure in Moggerhanger.

2.5 Development Strategy Revised Pre-Submission (June 2014)

Pages 95 to 101 refer.

- Policy 38 states that “Within Settlement Envelopes of Small Villages (i.e. Moggerhanger) beyond the Green belt, development will be limited to infill residential development and small scale employment uses.” Only a small part of the proposed development could be described as infill.
- “Local distinctiveness is an important characteristic. Without it the towns, villages and rural areas would lose their individual identities and their interest and attractiveness would be greatly diminished.” The character of this village is already being degraded for the reasons described in this paper.
- Policy 43 emphasises that development must:
 - a) be appropriate in scale and design;
 - b) respect the amenity of surrounding properties;
 - c) provide a high level of highway safety;
 - d) be complementary to the landscape both in the immediate proximity as well as longer views;

- With regard to Planning Application CBC/14/01818/FULL, the proposed large house on Plot 1 is interposed between two Grade 2 Listed cottages and is out of scale with both of them, so damaging their context and setting.
- The proposed development, as currently designed, will also contravene Page 63 Policy 23 and Page 68 Policy 24 with regard to the footpath on the A603 and will prevent any footpath improvements or road widening in the future.
- Page 78, paragraph 10.15 refers to the strategic housing market assessment undertaken for Bedfordshire in 2010 (refreshed 2012). This considered housing mix in relation to population growth and demographic change. As stated on page 79, Policy 30 requires that “all new housing development will provide a mix of house typesto meet the needs of all sections of the community.” Policy 31 on the following page makes reference to the ageing population and states that “all residential developments will be expected to demonstrate how they have responded to the accommodation needs of older people.” CBC’s own demographic projections and those of the Bedfordshire Clinical Commissioning Group refer to the fact the greatest population growth in Central Bedfordshire will be in the over 65s with an anticipated 87% increase between 2010 and 2031 (Central Bedfordshire Demographic Profile/ONS 2010). These figures indicate the need for some bungalows in the mix, which would also be more sympathetic to the existing adjacent Grade 2 listed properties. No such provision is currently envisaged.
- Policy 25 on page 70 highlights the importance of road safety, stating that planning permission will be granted where it can be demonstrated that development will not endanger highway safety or prejudice the free flow in the highway network. Local residents are unanimous in their condemnation of the traffic situation on the A603 and, in particular, at the junction adjacent to The Guinea. Any development that exacerbates the ongoing problems would contravene Policy 25. Moreover, the Governors of Moggerhanger Lower School have expressed their serious concern about any increase in traffic on Blunham Road, which is used by pupils going to and from the school. The designated buses transporting children to local Middle and Upper schools stop outside No 7 Blunham Road. As there is no pavement on the East side of Blunham Road, all these children would have to cross the access road to the new development. This is equally true for children attending Moggerhanger Lower School.

3.0 Current Infrastructure

3.1. The A603

- The A603 has been and continues to be of increasing concern in the village. The volume of traffic, particularly HGVs, is wholly unacceptable, given both the nature of

the community and the dimensions of the road itself. The number of vehicles passing through the village raises health, safety and environmental concerns, all of which are key considerations for local planning authorities.

- Residents have carried out their own traffic flow surveys of both the A603 and A421 Great Barford Bypass. They support Department for Transport figures, which, if anything, appear to be slightly on the low side at certain times of the day. This may reflect the fact that the surveys conducted by villagers are more recent than those of the DfT. It is clear that approximately 1,000 HGVs a day pass through Moggerhanger (700 recorded on average in 2008); one survey earlier in the year on a like-for-like basis identified more HGVs travelling on the A603 than on the A421. These figures are equivalent to some 50% of the volumes expected on a major trunk road, such as the A421, and have seriously diminished the quality of life for many Moggerhanger residents. The Local Authority's own figures for 2008 indicate that some 14,000 vehicles a day were travelling long the A603. DfT data for 2013 puts the figure at 14,554.
- DfT surveys also show that HGVs, buses, and vans have all increased as a proportion of total traffic flow over the period 2009 to 2013, HGVs rising from 5.7% to 6.3% (www.dft.gov.uk/traffic-counts)
- Moggerhanger operates a speedwatch system and it is clear that a very large proportion of vehicles ignore the 30 mph speed limit, resulting in increased safety concerns, additional noise, environmental degradation, and health impacts as a result of excess carbon monoxide, nitrogen oxides, hydrocarbons, ozone, and diesel particulate emissions.
- Measurements of traffic noise have identified levels as high as 95 dB. The level at which employers are required to provide employees with protection is 85dB. The World Health Organisation has identified a potentially adverse health impact at levels above 55db, including on sleep and cardiovascular health. As decibels are based on a logarithmic scale, 95 dB reflects a volume that is ten times greater than 85db!
- Residents with cardiovascular disease, COPD, or asthma or their precursors live within close proximity to the A603. A reduction in the volume of traffic, particularly HGVs is required in the interests of their health and wellbeing, and we should be avoiding any development likely to increase the number of vehicles.
- When the A421 Great Barford Bypass was planned, the expectation was that this would reduce the traffic volumes on the A603 as well as the obvious reductions on the old A421. Although never formally incorporated into Bedfordshire County Council plans, Mr. Gareth Hughes, Highways Network Co-ordinator for CBC, has confirmed that the expectation at the time was that there would be traffic restrictions on the A603 with northbound traffic on the A1 bound for the M1 routed along the A421. He also confirmed that a further expectation was that the quarry vehicles in Willington would be directed west to the A421 rather than exit via

Willington and Moggerhanger. The reality never materialised, probably because the demise of the then County Council coincided with the opening of the new A421. Also, the responsibility for the A603 between Sandy and the A421 consequently fell to two unitary authorities (Bedford Borough and Central Bedfordshire) rather than being the responsibility of just one (Bedfordshire County Council).

3.2 Water Supply and Drainage

- Various documents from CBC and Anglian Water have previously referred to problems of water run-off and drainage in the village. Foul and surface water both drain into the main sewer in Moggerhanger. Road drains can be seen overflowing at times of heavy rainfall and, of even greater concern, some buildings in Blunham Road experience **backwash of sewage sludge** into showers or manholes lifting under the pressure of water run-off. This is clearly a public health hazard. Any additional load on the drainage system will merely exacerbate the situation, which has been reported to Anglian Water on many occasions.
- **Low water pressure** is also a major problem for some properties at the opposite end of the village on Park Road and Park Close. Tests carried out by Anglian Water in July 2013 indicated a pressure of approximately 1 bar. Remedial work in November 2013 increased this to 1.6 bar, which is still insufficient for shower operation in some properties in the Park Close area. Again, any increased load on the water supply infrastructure will exacerbate the problems.

4.0 Previous Planning Applications at The Guinea

4.1 Development at The Guinea – Site H154

- Applications have been submitted for residential development on this site since at least 2001, the original being for two properties. All of these with the exception of the current, pending application were **declined or withdrawn** on advice from the local authority for reasons already identified in this paper.
- An indicative 11 dwellings were proposed for The Guinea in February 2008 as part of the options appraisal described in 'Site Allocations: Moggerhanger' (Mid Bedfordshire District Council). The local authority observations stated that **"Allocations will only be considered here if there is an exceptional need for development."** Infrastructure implications were identified, specifically in relation to primary level education and health care provision.

4.2 Criteria for Refusal of Previous Planning Applications

- Planning approval was granted in 2002 for a pair of semi-detached properties on infill land adjacent to The Guinea and fronting on to Blunham Road. These were never built.
- Subsequent applications after 2008 for up to 20 dwellings were refused or withdrawn because they **failed to comply with policies** (CS1, CS5, CS14, CS15, DM3, DM4, DM13) in the 'Core Strategy and Development Management Policies 2009', and with central government guidance contained within the 'National Planning Policy Framework 2012' as well as the 'Central Bedfordshire Council's Technical Guidance document in 2010'. These policies, which informed the decision to refuse, refer to the following criteria:
 - a) scale and character of the development
 - b) design which respects local context
 - c) enhancing community safety
 - d) proximity to local Listed buildings
 - e) conserve and where appropriate enhance the quality and integrity of the local built and natural environment
 - f) use land efficiently
 - g) respect the amenity of surrounding properties
 - h) comply with the current guidance on noise, vibration, water, and pollution
 - i) incorporate appropriate access
 - j) within settlement envelopes in small villages development will be limited to infill residential development and small scale employment

In refusing the application, CBC further commented that ".....the development would fail to make contributions required to mitigate its impact on existing local infrastructure....", This situation has not changed.

- From the earliest of the planning applications in 2001 relating to The Guinea, planners expressed concerns about the importance of any development being in keeping with existing properties and the character of the village. Numbers 2 and 5 (referred as No 1 in the list entry) Blunham Road are both Grade 2 Listed thatched buildings. Moreover, the proposed development site is currently in agricultural use, serving to reinforce the rustic nature of the environment. The surrounding residential properties (Nos 2, 4, 5 and 6 Blunham Road) are predominantly one or one and a half storeys high. Any development should be in keeping with the

surrounding buildings and clearly should not dominate the immediate locality by virtue of height or design.

- **No design statement or principles** appear to have been submitted to reassure residents that any development would meet the criteria identified as essential by Central Bedfordshire Council.
- At the public meeting with a spokesperson for the Developer held at Moggerhanger Village Hall on 16th June, continued **access to the agricultural land** was confirmed by the Developer via the access road to the proposed development. We understand that this guarantee has subsequently been **unilaterally withdrawn by Charles Wells** and Bewick Homes, the Developers, resulting in further concerns among residents that any reassurances may be of limited value.

5.0 Recent Development in Moggerhanger

5.1 Developments since publication of the current Local Development Framework

- **Substantial development has already taken place** in recent years within the village, notably in keeping with Government Guidance to utilise **infill**. However, no attention has been paid to the impact on infrastructure, other than the action to alleviate low water pressure in the vicinity of Park Road.
- Existing and planned infill since 2008/9 or where there is an application pending includes, but is not necessarily limited to, twelve additional dwellings (some conversions of existing buildings) on Park Road, St. John's Road, Bedford Road and Blunham Road.

5.2 Developments in Moggerhanger over the past Decade

- Looking back over the past decade to 2004, a total of 19 additional dwellings have been approved or built, encompassing all of the above roads plus Crescent View. No material changes have been made to the water and drainage infrastructure, as far as we are aware, and the traffic situation on the A603 has become progressively alarming and highly disruptive to the character of the village and the health and welfare of villagers

6.0 Concluding Comments

6.1 Attitude to Development

- The residents of Moggerhanger and Chalton are not by any means averse to development. Indeed, we see distinct advantages, not least in ensuring that the

local school and village public house remain viable and successful. However, any development must be in keeping with the character of the village and be consistent with the principles and objectives described in CBC's own planning strategy and in Central Government Guidance. In short, it must be sustainable and enhance the quality of life for local people.

- The Local Health and Wellbeing Board's Strategy for the period 2012 – 2016 embraces the following vision:

"Our vision is to ensure that Central Bedfordshire is:

A place where everyone can enjoy a healthy, safe and fulfilling life and is recognised for its outstanding and sustainable quality of life

and

We will do this by working in partnership with our communities and residents to improve the opportunities open to them to improve their health and wellbeing"

- Residents of Moggerhanger and Chalton are looking for a constructive approach to development and wish to work in close partnership with Central Bedfordshire Council and the Parish Council to ensure that developments are in the best interests of all concerned.

6.2 Precursors to Further Development

We would respectfully make the following recommendations:

- Residents are strongly of the view that the quality of village life has been progressively degraded in recent years. The irony is that the actions required to reverse this trend are relatively easy to undertake and are often of low or no cost. They are frequently a reflection of political priority rather than the need for substantial sums of money.
- The A603 traffic situation is the single most limiting factor on the lives and welfare of residents and the character of this Domesday Book village. This matter requires URGENT resolution in the interests of the health and safety of local people and to ensure that the vision expressed in paragraph 6.1 is achieved.
- Implementation of the **expectations for the A603** just prior to the demise of the County Council is an absolute imperative. Traffic calming at the junction of the A603, Blunham Road and St. John's Road, by means of either traffic lights or a roundabout, may be ineffective and counter-productive as it could increase local emissions at the junction. The solution lies in the original aspiration to direct HGVs away from the villages of Moggerhanger and Willington, utilising the A421 for the purposes for which it was designed at considerable public expense. This proposition should be resurrected as a matter of urgency; such measures might reasonably

include a restriction on vehicular weight or a re-designation of the road as has happened elsewhere in the County.

- Villagers would be more than happy to assist with an audit of both existing and required actions, and conduct the necessary evaluation of impact.
- Secondly, the water supply and drainage infrastructure should be upgraded prior to any further development in line with recommendations already embodied in local authority documents.
- In keeping with national and local guidance, future development should be confined to areas of infill rather than encroaching upon agricultural land and affecting the character of the village as a consequence.
- Any agreed development must be designed in such a way that it meets the criteria described in paragraph 4.2 above, including the need for sensitivity to adjacent properties.
- An assessment of the investment required in the local school to accommodate additional children should be part and parcel of any planning decision.
- Investment in other aspects of infrastructure, such as superfast broadband, should mitigate any potentially adverse impact on business and the local economy.
- An independent environmental, health, sustainability and business impact assessment should be considered alongside any planning application.

We stand ready to work in partnership in the interests of all concerned.

Professor Richard Parish, CBE,

on behalf of the MATHS Team and the residents of Moggerhanger and Chalton

August 2014