

Further comment on Planning Application 250545 (Land North of Coach Road) following Great Horkesley Parish Council meeting on 29th September 2025

Having considered new material submitted by the applicant, including the Design and Access Statement and the Transport Assessment, Great Horkesley Parish Council has resolved to maintain its principled objection to outline planning application 250545: no major site offered under the "call for sites" process should be granted consent until the Local Plan process has been completed and the optimum site(s) identified by due process.

Broadly, the proposal offers nothing which would make Great Horkesley a better place to live, which is what the Council would expect any major development within the parish to deliver. Those changes the applicant presents as improvements are in fact mitigations seeking – not always successfully – to offset the impact of the development.

Specifically, the proposal should be rejected because

- 1. It fails to identify how the necessary biodiversity improvement is to be achieved even though the site is within one of the largest landholdings in the parish;
- 2. It fails to provide better access to the countryside which would enable new and existing residents to live healthier lives: all the paths on offer with the proposal already exist and have been used for many years.
- 3. The introduction of significant kerbing and yellow lines would result in changing the appearance of Coach Road from a pleasant semi-rural lane to an urban street, which is not acceptable so close to open countryside;
- 4. It proposes parking restrictions which would undoubtedly increase the speed of traffic outside the Bishop William Ward School (BWWS) and, while it identifies various ways in which crossing Coach Road outside the school might be made safer, it does not in fact propose to introduce any of them;
- 5. It fails to identify that the route between Malvern Way and Monarch Lane, alongside the preschool, gives access to the village green, playground and village hall to some 650 existing dwellings along and south of Coach Road, whose residents would encounter more and faster traffic when accessing those facilities on foot and bicycle;
- 6. It fails to put forward a proposal to mitigate the additional burden which the development would place on the existing overloaded surgeries in Mile End, West Bergholt and Nayland. This is particularly disappointing because the provision of a clinic within the village was identified by parish councillors who met the applicant as having the potential to make the village a better place to live. (The applicant's representatives explained that current practice is to provide clinics rather than

- surgeries.) The hope was that the applicant would rise to the challenge, engage with the health authority, go the extra mile and provide a building in the village for such a clinic, though not necessarily within the site. The NHS has now confirmed the lack of capacity but the applicant has failed to deliver.
- 7. It fails to recognise that in 2025 discharge of raw sewage into rivers is no longer acceptable to anyone and that water companies are under pressure from central government to end it. Against that background, it is completely unacceptable to simultaneously accept that the West Bergholt treatment works does not have the capacity to take the sewage from the development, whilst at the same time cynically seeking to rely on Anglian Water's statutory duty to accept sewage at West Bergholt from any development that has planning consent. The proposal should be refused consent until such time as the treatment works has sufficient capacity to process the sewage that it generates.
- 8. It fails to address the impact on the community, and in particular on BWWS, of two major developments taking place in the village simultaneously. This is particularly disappointing because the issue was discussed at a meeting between councillors and the applicant, where it was explained that whilst capital sums provided under a §106 agreement might enable a school to be enlarged, once the new pupils generated by the development move on to secondary education, there would either be capacity in the school which would have to be taken up by children not living locally, thus increasing the number of journeys to school by car, or the school would be underfunded for a school of its size due to being undersubscribed, meaning staff redundancies and other unnecessary action would need to be taken. Phasing development in the parish through the Local Plan process would avoid overdeveloping the school at the expense of its playing field.
- 9. Following on from point (8), the applicant assumes that there will always be capacity at Trinity School to accept pupils from Great Horkesley. In fact, Trinity School is a small secondary, only 900 pupils, the admission to which is determined by straight-line distance between dwelling and school. The default secondary school for Great Horkesley is St Helena School, some 4 miles by road from the development site and well to the south of North Station, which is where many of the children living in the proposed development may be allocated places. Those who do gain a place at Trinity School will be displacing other Great Horkesley children who live further north in the village who will then have an even greater distance to travel to St Helena School.

The Parish Council's view is that there should be no further development in Great Horkesley until such time as Trinity School has the capacity to accept the secondary school pupils generated without disadvantaging others. In considering this, the impact of developing housing land within Chesterwell must be taken into account. The distance rule means that as the population of Chesterwell grows, fewer Great Horkesley children are likely to be offered places in Trinity.

10. Also following on from (8), the applicant appears to have failed to allow for the car journeys likely to be generated by the 100-house Hopkins Homes development east of Nayland Road when determining the size of the car park offered within the development.

11. Finally, the proposal fails to establish that the existing storm drainage network (visible at the southern end of Monarch Lane and then underground though to Green Lane, where it discharges through ditches into the Black Brook) has the capacity to dispose of the overflow from the SUDS within the site. At times of prolonged rainfall Green Lane residents have reported considerable flooding near their property by water emanating from a large diameter pipe thought to be the outfall of the drainage network serving Horkesley Heath. The applicant must demonstrate that the overflow from the SUDS will be discharged cleanly into the Black Brook without increasing the flood risk to any existing homes.

Whilst maintaining its objection for the reasons set out above, the council agreed to make the following recommendations and observations in case the planning authority were minded to give consent:

- 12. In order to deter the use of Coach Road as a through route and to assist in the applicant's stated goal of improving the road for pedestrians and cyclists, the entirety of the existing 30mph limit should be reduced to a 20mph limit; signage should include 20mph roundels on the road surface.
- 13. The applicant should introduce a dropped kerb where Monarch Lane meets Coach Road in order to improve the accessibility between the cycle route which they propose to create and the existing facilities on the village green. Warning signage to be provided on Coach Road.
- 14. The applicant should provide a permanent crossing at the northern end of Malvern Way to ensure that pedestrians always have priority when crossing Coach Road; it is simply not good enough to increase the risk and then point out how others might address that increase, rather than bringing a proposal forward as part of the application.
- 15. The applicant is simply wrong about the status of Brick Kiln Lane: it is of unknown ownership, it is not maintained by the highway authority (we wish!) and it carries a public right of way on foot. As such there is no right to cycle on it. It is also too narrow in parts to accommodate a cyclist alongside a car and too uneven for cycling, not least because of the presence of non-standard speed humps introduced by residents. The parish council has previously stated its view that the most cycle-friendly route between the development site and the A134 would be via Blackbrook Road, although this would require a crossing of Brick Kiln Lane and the introduction of a limited gap in the existing barrier. Such a route would offer a gentler gradient on a much wider road with fewer pavement-parked vehicles than Keelers Way, less traffic (80 houses as opposed to 300) and no buses.
- 16. Measures should be introduced to reduce the speed of Keelers Way traffic in the vicinity of Malvern Way and Grange Road i.e. where the proposed cycle route crosses it; these are likely to be generally popular with existing residents. The council is firmly of the view that driver behaviour on Keelers Way to the east of Grange Road, including pavement parking, is such that it will never be popular with cyclists. Once it has been established that a link to the A134 can be created on Blackbrook Road, the Keelers Way proposal, including changes at its junction with the A134, should be dropped.

- 17. In principle, the council would support the provision of a suitably-sited clinic, either purpose-built or within an existing building, to reduce the need of new and existing Great Horkesley residents to travel to overloaded facilities elsewhere. In this connection, it needs to be pointed out that two health establishments in Mile End that the applicant has identified as being closest to their site, the Cygnet Hospital and the St Aubyn Centre, offer highly specialised services which, statistically, very few, if any, residents of Great Horkesley are likely to need. They should not have been cited in support of the application.
- 18. Surprisingly, the applicant is intent on bringing mains gas into the village. This would appear to run counter to the spirit of the age by reducing the overall sustainability of the development, but the council has no doubt that it would be popular with new and existing residents. The terms on which it would be made available to existing properties should be made clear.
- 19. The biodiversity gain of the proposal might be increased were the applicant to take ownership of the land separating the site from Gala Close and provide funds for its management in perpetuity as, for example, community woodland, albeit with existing access on foot maintained.

As was identified at the outset, the application as it stands is devoid of proposals to make Great Horkesley a better place to live. Although the council continues to object to the proposal for the reasons set out in previous responses and in items (1) to (11) above, it believes, without prejudice, that it has set out in items (12) to (19) above, measures which, if implemented by the applicant, would go some way towards that goal.

Members of Great Horkesley Parish Council have been invited to meet the applicant's representatives again. These matters will be among those to be discussed at that meeting.