



The Planning Inspectorate
Major Casework Team
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16th September 2022

Dear Sir,

Section 62A Planning Application: S62A/22/0007
Land to the South of Henham Road, Elsenham, Essex
(Local Planning Authority Ref.: UTT/22/2174/PINS)

I am writing to object to the planning application made by Countryside Partnerships plc for 130 homes at the Land South of Henham Road, Elsenham and offer the following objections and comments.

1. Countryside Protection Zone

The Existing Local Plan 2005, Policy S8 – the Countryside Protection Zone (CPZ) defines a policy which protects the countryside for its own sake and states that development will only be permitted if its appearance protects or enhances the particular character of the part of the countryside within which it is set, or there are special reasons why the development in the form proposed needs to be there.

Although the existing Local Plan is considered to be out of date and no longer current, there are nevertheless, parts of the plan that still have credibility and relevance; the Protection of the Countryside is one of those parts.

The District Council's last iteration of a new Local Plan (2018/19) that was ultimately withdrawn, did nevertheless, continue the principle – as a part of its Spatial Strategy – by including Policy SP10 – Protection of the Countryside. This proposed policy again gave protection to the areas falling within the CPZ.

It should also be noted that the new Local Plan currently being prepared by the District Council, also contains within its evidence informing the new Local Plan background studies, one of which is a Countryside Protection Zone Study (LUC, June 2016). As a preface to the study document, the District Council states that:

This study was commissioned to examine whether the Countryside Protection Zone (CPZ) still meets its defined purposes of retaining an airport in the countryside and protecting the surrounding areas from encroachment and consolidation of development.

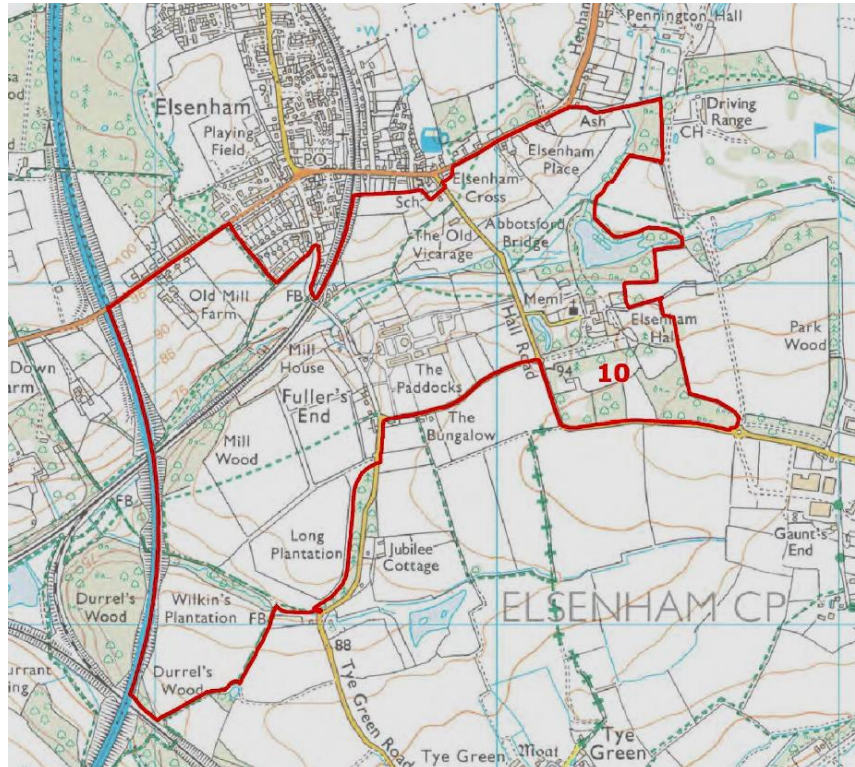
The study divides the land forming the CPZ into ten (10) parcels, with Parcel 10 being formed by land to the south of the settlement of Elsenham, including all of the land forming the planning application for 130 homes on Land South of Henham Road, Elsenham. Although the study suggests that a part of the northern boundary of Parcel 10 could be moved to the railway line, the Study concludes that:

The CPZ helps to maintain the openness of the countryside and protects its rural character and restrict the spread of development from the airport. For

some parcels, particularly to the south of the airport, the CPZ plays an essential role in protecting the separate identity of individual settlements.

And summarises by stating that:

In summary, therefore, the CPZ is helping to maintain the vision of the ‘airport in the countryside’. Unless other planning policy considerations suggest otherwise, we recommend that the CPZ is carried forward into the new Local Plan.



Given the District Council’s continuing policy of giving protection to the countryside and its willingness to carry that protection forward into the new Local Plan, the proposal to build a 130-home residential development within an area highlighted as a Countryside Protection Zone must be strongly challenged.

The Existing Local Plan 2005, Policy S8 – The Countryside Protection Zone states that development will not be permitted if either:

- a) *New buildings or uses would promote coalescence between the airport and existing development in the surrounding countryside;*
- b) *It would adversely affect the open characteristics of the zone.*

Within the withdrawn Local Plan 2018/19, Policy SP10 - Protection of the Countryside, a policy of continued constraints on development within the CPZ is sustained, with the proposal of four tests being applied, namely:

1. *To protect the open characteristics of the CPZ;*
2. *To restrict the spread of development from London Stansted Airport;*
3. *To protect the rural character of the countryside (including settlements around the airport); and*

4. *To prevent changes to the rural settlement pattern of the area by restricting coalescence.*

Applying the CPZ ‘tests’ to the proposed development on the Land South of Henham Road, the 130-home development proposal must (and should) fail as it would not only adversely affect the open characteristics of the zone, but would also cause a failure in the protection of the rural character of the countryside.

Given the above, it is obvious that Uttlesford District Council has maintained a clear and continuing policy regarding inappropriate development within the countryside and that this protection principle must be upheld and encouraged.

2. Protection of Landscape Character

Within the Existing Local Plan, the protection of landscape character is best supported by Policy S7 – The Countryside, which states that:

The countryside to which this policy applies is defined as all those parts of the Plan area beyond the Green Belt that are not within the settlement or other site boundaries. In the countryside, which will be protected for its own sake, planning permission will only be given for development that needs to take place there, or is appropriate to a rural area. This will include infilling in accordance with paragraph 6.13 of the Housing Chapter of the Plan. There will be strict control on new building. Development will only be permitted if its appearance protects or enhances the particular character of the part of the countryside within which it is set or there are special reasons why the development in the form proposed needs to be there.

In a similar manner, within the withdrawn Local Plan 2018/19 there was a policy proposed for inclusion, Policy C1 - Protection of Landscape Character that also gave protection where development on the edge of settlements was being proposed.

Policy C1 gave the following ‘tests’ to the granting or refusal of development within or beyond development limits;

Policy C 1

Development will be permitted provided that:

1. *Cross-valley views in the river valleys are maintained with development on valley sides respecting the historic settlement pattern, form and building materials of the locality;*
2. *Panoramic views of the plateaux and uplands are maintained especially open views to historic buildings and landmarks such as churches;*
3. *It preserves and enhances the historic settlement pattern, especially scale and density, and that it uses materials and colours that complement the landscape setting and landscape character. Such development should be well integrated with the surrounding landscape;*
4. *It preserves and enhances the landscape pattern and structure of woodland areas, hedgerows and individual trees and does not diminish the role they play in views across the landscape;*
5. *It preserves and enhances the historic landscape character of field patterns and field size, greens, commons and verges;*

6. *No material harm is caused to the form and alignment of protected historic lanes; and*
7. *It preserves and enhances the landscape significance and better reveal cultural and heritage links*

If the 'tests' as defined in the Existing Local Plan 2005 and those proposed in the withdrawn Local Plan 2018/19 are applied, the proposed 130-home development must fail a number of the tests. From the plans and illustrative layouts and views submitted, the scale, form and appearance of the development will neither protect or enhance the particular character of the countryside within which it is set, given its particular location at the historic centre of Elsenham village and bordered on two sides by historic, listed buildings.

The greenfield site forms part of the countryside that borders the village, and currently provides open, cross-valley views towards the village's ancient Saxon church of St. Mary's, Elsenham Hall, woodland and farmland. This part of the village, Elsenham Cross with its listed buildings must be regarded as the most sensitive to change; therefore a modern residential housing development of the scale proposed, is very unlikely to be able to meld sympathetically with the historic architecture and landscapes that will surround it.

3. Site Access

The proposed site access to the development is located approximately 130 metres from the Elsenham Cross road junction, which provides the local links to Stansted Airport and Great Dunmow. The junction also acts as the only legal access point into/out of the village for all heavy goods vehicles (HGVs), all other road access routes being prohibited by either vehicle weight or width restriction.

It is noted from the illustrative layout plan that the site access will be directly onto the B1051 Henham Road. Given that the roadway at that point is relatively narrow, approximately 7 metres width, entering and exiting the site onto the roadway is likely to be difficult, particularly for larger vehicles.

Elsenham Cross is already a busy roadway as its junction serves as a link towards Henham and Thaxted to the east and Stansted Airport, Takeley, Great Dunmow and Bishop's Stortford. The layout and scale of present junction must be regarded as inadequate and cannot properly fulfil its function, particularly when used by large, wide, heavy HGVs. With the further increase in road traffic from the 350-homes (Bloor Homes) development – currently under construction – the junction and the three roadways close to it (Hall Road, High Street and Henham Road) will become even busier.

A development with an access on to a busy road and also close to a road junction must raise potential issues/concerns of road safety; with particular concern being the 2-form entry Elsenham Primary School located almost directly next to the junction on its south-western side.

4. Local Road Network & Transport Plan

Elsenham has three main road access routes into the village that provide connectivity to the surrounding and nearby towns of Saffron Walden, Bishop's Stortford and Great Dunmow. Each of these access routes are via B-roads and/or narrow country lanes, which with the growth of Elsenham have become more and more unable to cope with the increasing levels of traffic that are using them.

Travel to Saffron Walden by road – shortest and quickest route – is through Ugley Green, via Station Road and New Road, then via the narrow, winding lanes of Bedwell Road, Snakes Lane and Pound Lane before joining the B1383. Alternative routes via Stansted Mountfitchet or Thaxted are possible but are very much longer in time and mileage, therefore little used by residents.

Travel to Bishop's Stortford is generally via the B1051 through Grove Hill, Lower Street and Chapel Hill in Stansted, then joining the B1383 westwards to Bishop's Stortford. An alternative route is through Ugley Green, via Station Road and New Road, then via the narrow, winding lanes of Bedwell Road, Snakes Lane and Pound Lane before joining the B1383 westward.

With the increase in Elsenham population and traffic, travel has become increasingly difficult via the Grove Hill route, due to the narrowness of the roadway on the hill, the parked cars and the sequencing/timing of the traffic light system. Because of the issues of Grove Hill, use of the alternative route via Ugley Green has become more popular with Elsenham residents; this has led to more traffic and larger, wider vehicles using this route – in spite of there being a vehicle width restriction on this route.

Travel to Great Dunmow (and Stansted Airport) is via Elsenham Cross and Hall Road to Takeley, then eastward on the B1256 (Dunmow Road). An alternative route is via Hall Road, the Coopers End Roundabout (Stansted Airport), joining the A120 via the Bassingbourn Roundabout (Stansted Airport).

Use of Hall Road can be troublesome and potentially dangerous, due to the HGVs that constantly use the road to access the Viridor landfill site. The overall width of the highway along Hall Road does not allow two HGVs to pass each other within the tarmacked roadway, as a consequence, lorries are forced to use the grassed verge that leave deep ruts in the verge. Should a car/van be forced into these ruts, accidents could result.

In summary, all of the access routes into Elsenham are problematic and becoming increasingly not fit for purpose. Over the last ten years (at least) no substantive improvements have been made to these roads by the relevant highway authorities, nor are there known plans proposed in the future.

Transport Plan

It has been noted that once again, the developer's transport consultants has generated numerous traffic flow simulations and once again reached the conclusion that the effects of the 'small' amounts of traffic and vehicle movements generated by the proposed development will have only minimal and/or modest impacts.

Unfortunately, the computer-based modelling does not appear to factor in the real-time, day-by-day effects of the ever increasing levels of traffic – both in size and volume – has on the road network that surrounds Elsenham. Grove Hill in Stansted Mountfitchet is held up as a particular blackspot by residents and a source of delays and tailbacks. These can be caused by badly parked cars on Grove Hill, wide, possibly overweight HGVs that totally ignore the weight limit restrictions, or drivers not local to the area who do not understand the 'conventions' when driving down Grove Hill and thus meet other vehicles coming up the other way. Developers and Essex Highways have repeatedly insisted that the sequencing of the traffic light system can be adjusted and/or that a second traffic sensor can be installed to better predict and improve the traffic flows; however, the flows through the lights do not appear to improve as a consequence of these perceived 'improvements'.

Over the last ten to fifteen years, whenever a new residential development has been proposed in Elsenham, each new development and its accompanying transport assessment has been assessed on an individually and piecemeal basis. At no time have studies been carried out to analyse the overall cumulative effects of these new developments on the local road network. Without this in-depth analysis, the highways authorities have been unable to determine when road network hotspots – such as Grove Hill – will reach their capacity limits, or where potential hotspots will develop in the future. Thus, when challenged by a developer, the highway authority lacks the necessary evidence to counter the developer's transport assertions and therefore offers no objections to the application.

For this current planning application of 130-homes, the assertion is made once again by the developer's transport consultants that the additional traffic generated from the development is both 'modest' and 'accords with local and national policy'. However, for the residents of Elsenham and its surrounding villages, the effects generated by this new development adds yet further, to the burdens of congestion, delays, pollution and stress to everyday life.

5. Conclusions

For all of the above objections given and those provided by other consultees, this proposal and application to build 130 new homes in Elsenham on a historically sensitive location in the village must be opposed and refused.

The existing local facilities and infrastructure within and surrounding Elsenham are already under severe stress and for some, already overloaded. No concerted proposals appear to have been made by local authorities to make improvements to these existing facilities and infrastructure, nor plans in place to add new amenities in the future.

Overall, Elsenham, like many other settlements in Uttlesford, is expected to be accepting and tolerant of the need to accommodate new housing developments, but without receiving the necessary improvements to the essential infrastructure and communal amenities, in order to support this increased growth in the population.

Yours faithfully,

P.J. Johnson & S. Johnson