

**From:** Alice Fagan [REDACTED]

**Sent:** 09 March 2023 15:36

**To:** Section 62A Applications <section62a@planninginspectorate.gov.uk>

**Subject:** Comments on S62A/2023/0015 Proposed development at Grange Paddock, Ickleton Road, Elmdon, Essex, CB11 4GR

**Reference S62A/2023/0015 Proposed development at Grange Paddock, Ickleton Road, Elmdon, Essex, CB11 4GR.**

I am writing to OBJECT to this planning application.

The area is described in this application's Transport Statement as one of 'strong urban character'. This assessment could not be further from the truth. Elmdon is an isolated, rural, picturesque village, described by the Village Design Statement (2019) as 'a quintessentially attractive English village' with 'rural characteristics' and 'tranquillity', in an area that the Uttlesford Local Plan (2005) recognises as having 'intrinsic character and beauty' due to its 'rural nature' and 'value for agricultural production and biodiversity'. It is a small, typical Essex village of around 600 residents, and 150 houses. There are no services or facilities in the village aside from a church and small village hall, and the proposed development of 18 dwellings sits outside of the village envelope; would increase the number of houses by 10-12%; and sits on a site that slopes upwards, leaving the north side of the site up to 10 metres higher in altitude than the Ickleton Road below. Nowhere in the village are there 18 houses built by the same developer, in the same style, at the same time. To say that this development would have only 'minor impact upon landscape character' (Point 4.115 in the Planning Statement) is a brazen understatement.

### **Character**

The Village Design Statement (VDS) provides an assessment of the character of the built and natural environment of Elmdon. Uttlesford District Council adopted this VDS in 2019 as 'Council Approved Guidance for the purposes of Development Management and Planning Policy', that aims to ensure development is sympathetic to the local area and community. The application plans, proposal and documentation do not make any mention of this VDS, presumably because its recommendations are in direct contrast to the proposal. The VDS notes 'winding sunken lanes, blocks of ancient woodland, drainage ditches and grassy tracks' as key landscape characteristics and recognises that biodiversity and several important wildlife habitats are present. The visual renderings proposed do not appear in any way in keeping with the character of local houses in design nor material. The suggestion of 'sustainability' is laboured throughout the application documents, despite the plans showing no indications of tangible sustainability.

### **Policy**

The National Planning Policy Framework (NPPF) states that

*"Achieving sustainable development means that the planning system has three overarching objectives".*

These objectives are set out as "economic", "social" and "environmental". The NPPF notes a presumption in favour of **sustainable** development. The proposed development application fails every one of these three objectives, and therefore cannot be considered 'sustainable'.

On the economic objective – this land is not the right type of land that is set out at every level of policy for new development. Brownfield and previously developed sites are prioritised, but this site is high quality greenfield. The proposal does not provide any infrastructure, and will only put greater strain on infrastructure that is already straining.

On the social objective – the number and types of homes proposed do not meet present or future needs. Starter homes or downsizing options are required, in keeping with village character. 3-5 bedroom family homes in the isolated, rural countryside provide no added benefit on top of the housing already available in the village. As a young adult who may look to buy a first home in the next few years, I do not consider the dwellings proposed as suitable for that need. Point 4.101 of the Planning Statement claims an ‘acute shortage’ of housing, yet between the years 2018-2022, 30 registered property sales took place in Elmdon, indicating that there is no shortfall of homes on the market. In the context of a village with approximately 150 homes, ‘acute shortage’ is a gross overstatement in the context of community needs. Whilst there are certainly open spaces in Elmdon, there are currently no services except a church and a small village hall that is seldom used due to its limited size.

On the environmental objective – the development is in contrast to the existing natural, built and historic environment. Clearing current habitat will reduce biodiversity, not improve it. Waste and pollution will not be minimised in a location that requires car travel to reach any service, leisure or work activity, nor does this reliance on personal vehicles help to mitigate or adapt to climate change and increasing carbon footprint.

This development application has not been shaped by early, proportionate nor effective engagement with the local community, nor does it offer any benefit or fulfil any need required by the local community. The adverse impacts of this development significantly and demonstrably outweigh any supposed benefits.

### **Community engagement**

The applicants have not ‘enthusiastically’ ‘sought to involve the local community’, as is claimed in the Statement of Community Engagement. One ‘event’ took place, with 48 hours’ notice, and in the middle of the afternoon (not in the evening as is suggested in the Statement), a time which specifically excluded those employed under conventional working hours or those collecting school-aged children. Community engagement was not ‘proportionate’, considering the scale of the development and the significant likelihood of impact on those houses directly opposite/around the site.

### **Services/transport**

Despite claims made in the Planning Statement and Transport Statement, Elmdon is not a village with services or public transport. The only bus that stops in Elmdon is the school bus (444) that runs once a day, Monday to Friday, and only in term times. The timings of this service render it useless for anyone with conventional working hours or hoping to spend a few hours in the small local town of Saffron Walden. The other buses and stops referenced are either a 40 minute walk away or a 60 minute walk away. Both of these walks would entail winding and poorly maintained country lanes with no pavements or pedestrian paths and where speed limits are 60mph. There is no pub in Elmdon. The pub that did exist closed 10 years ago with no indication of an imminent or distant reopening. There is no school, no shop, no post-office, no doctors/dentists/pharmacists and no pub/restaurant/café within safe or reasonable walking distance. The doctors surgeries and schools that do exist in other settlements within driving distance are already oversubscribed. It cannot be stressed enough how vital personal car travel is for residents in Elmdon.

### **Vehicle/Road use**

Vehicle and road use are already an issue of concern. The stretch of road directly adjacent to the proposed site and its access is NEVER free of parked cars. Many residents do not have off-road parking, and therefore must park cars on Ickleton Road, essentially creating a one lane road that already forces traffic to drive on the wrong side. Point 3.13 of the Transport Statement falsely states that Ickleton Road ‘has two marked lanes and is circa 6m in width for its entire duration’. Ickleton Road does not have any road markings, and is 5 metres wide for much of its duration.

Furthermore, the 2011 Census reveals that 94% of households had at least one vehicle and 64% of households had 2 or more vehicles. 2021 Census data records an increase, with 68% of households having 2 or more vehicles. These figures are a testament to the necessity of vehicular mobility for life in this rural settlement. 18 more dwellings would result in at least 30 more cars, but the likely number would be even higher due to the nature and size of the houses proposed in the plan. Add to that even more vehicle movement for service vehicles, deliveries, utilities, groceries etc. This number of cars adding to already high traffic flow and limited manoeuvring ability (due to parked cars) is dangerous and impractical. Point 5.1 in the Transport Statement estimates the likely amount of traffic that would be generated at peak times, based on a review of vehicular trips on sites excluding Greater London (and not including a single site in the county of Essex, let alone the district of Uttlesford.) The sites chosen to provide data for the report are all classed as 'Suburban' or 'Edge of Town' locations that are simply not comparable to Elmdon as a rural, isolated village. It is also difficult to see how building more houses in a location where cars are a necessity can be considered in any way sustainable.

### **Flooding**

The development itself will likely be safe from flooding due to its elevation. However, Ickleton Road already experiences flooding issues on the stretch directly adjacent to the development site, due to inadequate drainage and disposal at times of high rainfall or surface run off. The materials, surfaces and foundations associated with 18 new dwellings, garages, driveways, gardens, terraces, access and communal spaces on a site that slopes downwards can only exacerbate these existing issues. The Flood Risk Assessment fails to adequately highlight this risk by focussing on the low flood risk within the actual site itself. Furthermore, the infiltration tests that informed this report were conducted at the start of September 2022, following a summer of heatwaves and record high temperatures.

### **Lighting**

At present, Elmdon has no street lighting, no commercial or business lighting, and no public space or service lighting. The only artificial lighting comes from private external residential porch or side lights, most of which are on sensor timers and thus only lit for short periods of time. The acknowledged need for lighting in this development for safety and security reasons will interrupt the dark landscape and potentially constitute 'obtrusive light' or 'light pollution', especially given the elevated position of the site in relation to current housing.

### **Impact on individual buildings**

This development is likely to cause significant detrimental effects on individual buildings and property on the Ickleton Road. This is predominantly because of the elevated position of the proposed housing, the potential for flooding risk, and features of the development site. Overlooking, shadow, visual intrusion, noise disturbance and light pollution are all issues of concern. Point 4.96 in the Planning Statement suggests that development will add built form to the rear of current houses on Ickleton Road. This is incorrect; the proposed houses will add built form to the front of the current houses. The VDS details that 'The Ickleton Road runs down a small valley where most of the houses are located'. Due to the upwards slope and elevation of the proposed site compared to its southern neighbours, the site has a high probability of protruding upwards into the panoramic vistas of the locality, despite point 4.17 of the Planning Statement claiming the exact opposite.

### **Biodiversity/wildlife**

The impact on wildlife and biodiversity does not seem to have been given any serious consideration in this application. According to Section 41 of the Natural Environment and Rural Communities Act 2006, Priority Habitats include hedgerows and calcareous (chalky) grassland/neutral grassland both of which appear to exist at this site. Numerous protected and priority species inhabit the fields, woodland, grassland and even gardens of Elmdon, presumably including the proposed site. These include but are not limited to badgers, bats, hedgehogs, multiple herds of deer, muntjac deer, foxes,

hares and countless birds, small mammals and invertebrates. Whilst the Preliminary Ecological Appraisal could not find evidence of badger setts, this search was conducted when the ground was covered with snow.

The statement from Natural England offers 'No Objection' on the basis of adverse impacts on statutorily protected nature conservation sites or landscapes. It does however make clear that their generic advice on all other environmental issues still applies. This guidance (detailed in Annex A) includes that development should be designed to meet the 15 Green Infrastructure Principles, but the proposal fails to meet multiple, such as 'Principle Why 5: Resilient and climate positive places' and 'Principle What 5: Respond to an area's character'. It is also the case that some of the questions in the required Biodiversity Checklist have been incorrectly answered. For example 'Does the application site contain or is it adjacent to: a lake; river; canal; stream; ditch; marsh; or reedbed?' has been answered with 'No' but should have been ticked as 'Yes' due to the Planning Statement's own admission that the 'site slopes downward towards its southern boundary where there is a natural drainage ditch running along Ickleton Road' (point 2.3). Similarly, 'Does the application involve lighting of green space within 50m of woodland, water, hedgerows or tree lines' has also been marked as 'No', when also by the Planning Statement's own admission the site will contain lighting of a greenfield space with hedgerow borders and tree lines already in existence.

### **Precedent**

Elmdon is surrounded on every side and in every direction by privately owned farmland, meadows, grassland and woodland. This development represents an incredibly high risk of setting precedent that will have a domino effect, encouraging multiple landowners to build more and more housing in a village that has no services. This includes the possibility that the current applicants will apply to extend this development site in the future, using the current plan as precedent to add more dwellings.

### **Heritage/archaeology**

The Planning Statement point 2.7 states that 'There is no known archaeological interest at the site or in the close locality', and point 4.72 claims a 'neutral impact' regarding heritage matters. However, the Specialist Archaeological Advice from Place Services clearly states that 'No development or preliminary groundworks of any kind' should take place before an appropriate programme of investigation and excavation has taken place due to the proposed site being identified as 'an area of potentially sensitive archaeological deposits' and potentially impacting the setting of a scheduled monument. There is no indication that this clear advice has been or will be adhered to. It should also be noted that there are 37 listed buildings in Elmdon, multiple of which are in the direct vicinity of the site.

### **Closing comments**

Planning Statement point 4.1 claims that 'this proposal would represent sustainable development that would enhance the viability of existing community facilities and services, and deliver a significant number of new dwellings in the context of a significant shortfall in terms of supply'. As previously laid out, there are no existing community facilities and services to enhance the viability of, there is not a 'significant' shortfall in terms of supply based on local housing needs, and the homes proposed do not meet the local housing need that does exist. This proposed development does not meet any definition of sustainable, and will categorially cause change to the character of the village.

Alice Fagan,

Elmdon,

8<sup>th</sup> March 2023