

Response to Planning Application S62A/2023/0015

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We live on Ickleton Road, directly underneath the proposed site, and whilst there are many concerns, such as light pollution; the fact that Elmdon is classed as an unsustainable village; and the danger to protected species which currently reside directly in the hedgerows and woodland in front of us, (the proposed road area) such as great crested newts, hedgehogs, several species of bats, barn owls, woodpeckers, a badger sett and starlings in the spring, my objection will concentrate predominantly on three main areas of concern. These are the proposed road, the flood risk, and the sewage system.

The road:

My first concern, before getting into the particulars of the issue of the road arises on page 2/3 of the 20221216-TS-Rev A-Grange Paddock Ickleton Road. It clearly states:

- 2.1 This section sets out the policy context. Development and growth are encouraged at national, regional and local level. How this is made sustainable in the longer term is by encouraging walking, cycling and public transport use.

Point 2.5 goes on to re-iterate

- b) *opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) *opportunities to promote walking, cycling and public transport use are identified and pursued;*

It is disingenuous to state that this development will encourage walking, cycling and public transport use because, contrary to what is written in the application, there are no amenities in the village. There is no pub, no nursery – (it closed in 2018), the Village Hall is tiny and not fit for purpose. The church, one of a group in the diocese does not offer mass on a weekly basis. This statement therefore is rendered inaccurate:

- 3.3 Elmdon village provides a few limited facilities, including bus stops, a church, a pub, a childminder, and a village. Further facilities are available at Ickleton and Great Chesterford, circa 5km and 6.5km from the site respectively, including a railway station, convenience store, doctors surgery, bakery and recreational ground.

Elmdon has circa 150-180 houses, and a small population of approx. 300 people. The figures given in the application include both Duddenhoe End and Wendens Loft which are villages in the surrounding areas and elevates the population maybe to enable the application to compare Elmdon to Manuden,

but they are not comparable. Manuden has a pub, a school, a bus route, a larger population (700), and is nearer to local towns (Stansted Mountfitchet and Bishops Stortford).

Walking and cycling are great as recreation here, but 'encouraging walking cycling and public transport use' is irrelevant with regard to this application. The primary school is two miles from Elmdon. Children cannot walk to it, aside from the distance, as there is no pavement for a large stretch of this from Elmdon up to Chrishall woods, and then people would have to walk down muddy footpaths. The reason that the council is obliged to provide a primary school bus is because 'There is no safe walking route between their home and school.'

Free school transport

Children of [compulsory school age](#) qualify for free school transport if they go to their nearest suitable school and any of the following apply:

- the school is more than 2 miles away and the child is under 8
- the school is more than 3 miles away and the child is 8 or over
- there's no safe walking route between their home and school
- they cannot walk there because of their [special educational needs or disabilities or a mobility problem](#)

<https://www.gov.uk/free-school-transport>

The nearest pub is also two miles away, and as these houses are targeted at families, it is unrealistic to think that they would cycle/walk through the narrow and hilly lanes with children to the pub/school and back for anything other than occasional recreation.

The only public bus route that is in the village is the 444 which leaves from Kings Lane- a km away from the proposed site- and is a school bus for secondary school children. It departs on school days at very specific times, once in the morning, returning at around 4pm, and would not be a suitable mode of transport for a commuter. The 31 bus which is mentioned in the application is more than two miles away in Chrishall, and to walk that distance, the villagers would not have a safe route between their house and the Chrishall bus stop. (No pavement) The primary school bus stops directly opposite the proposed road entrance to site which will be incredible dangerous for the children.

The nearest shop to Elmdon is 3.3 miles away, through hilly roads- it is impractical to suggest cycling/walking to the shop. No one will choose to cycle rather than drive, purely because of the distance and nature of the hills. (not to mention the fast, windy country lanes and lack of pavements). In fact although the planning application does not mention this there have been two very nasty accidents at the crossroads further down that road. My neighbour was fortunate to come out unscathed of his accident but the cars were demolished. Furthermore, the train station- which is indeed a sustainable method of transport, is 6 miles away (Audley End train station). This would require driving through the village road to get there. There is another train station at Great Chesterford, 6.9km away - the only train station referred to in point 3.10. This train station would lessen village traffic but is a longer journey to get to London (more stops on this route) and ergo a less desirable option for commuters.

Driving to the train station/the nearest pub in Chrishall or the school would mean having to drive through the already congested village which has narrow roads, narrow pavements (where there is one) in places, and cars parked along much of it. As the development would rely heavily on driving through the village it would not be green and healthy. Which brings me to the final paragraph of 2.6

(please see highlighted area)- this development does not limit the need to travel and it does not offer a genuine choice of transport modes.

e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making."

The road which has been earmarked to allow access into and out of the development cannot guarantee that it will provide point b on 2.8: safe and suitable access to the site for all users. The corner is very tight, and at a point in the village where cars are only just slowing down as they enter the village, (even if the 30 mile signs were moved as suggested). Furthermore, it will create a near crossroads with Hollow Road, and make it a dangerous junction. If you imagine that there will be two cars per household- which is a conservative estimate- that is 34 cars coming and going from that junction many times daily. Not to mention delivery vans, bin lorries, and other traffic using that road- will make it dangerous, alongside pedestrians walking up and down the road, and most importantly crossing at that tricky junction. Further, the primary school bus (just to emphasise, this is not a public bus) picks the children up from the opposite corner of the entrance- please see the proposed area map. The blue mark is where the children are currently picked up from. This has not been taken into consideration and would be very dangerous.



The illustration of the proposed site entrance is ambiguous at best. Path (um) does not exist, and the tcb (telephone box?) is on the other side of the road. The picture makes no reference whatsoever to the Alfred Shot residence which has a driveway off the proposed road leading into it. (please see photo below)- note the driveway and the track below, it is missing from the picture above of the development. If so, it will be a dangerous road not only for cars, but for pedestrians.



With all this in mind, I believe the development does not meet all of the criteria below:

Development will only be permitted if it meets all of the following criteria:

- a) Access to the main road network must be capable of carrying the traffic generated by the development safely.*
- b) The traffic generated by the development must be capable of being accommodated on the surrounding transport network.*
- c) The design of the site must not compromise road safety and must take account of the needs of cyclists, pedestrians, public transport users, horse riders and people whose mobility is impaired.*
- d) It must be designed to meet the needs of people with disabilities if it is development to which the general public expect to have access.*
- e) The development encourages movement by means other than driving a car."*

One final brief point about the road. It would decimate 29 trees, 10 ash trees which have die back, but are still deemed healthy (why are they not cutting the three less healthy ones?), and is currently deemed woodland priority habitat. There is a badger sett on the proposed site that my next door neighbour has been watching for the past two years, barn owls, bats, crested newts hedgehogs and other animals.

Flood risk:

Though the application documents do not properly indicate how high above our houses the development will be, they will be located up to 15 metres above us. My main concern with this is the potential for surface water flooding. In the document: 20221219-FRA_SuDS_Strategy-Revision_A-Grange_Paddock_Redacted.pdf it states (4.3) “the site is mostly at ‘very low risk’” but the document makes no mention of the well documented flash floods which have plagued some houses on Ickleton Road. Both in 2016 and 2019- floods causing damage to the houses have been reported and documented. Two things that came out of emails with experts were that the road needed to be widened to stop flooding, and the ditches needed to be better maintained by Pyles and Smith.

Surface Water

- 4.2 Surface water flooding refers to flooding caused when the intensity of rainfall, particularly in urban areas, can create runoff which temporarily overwhelms the capacity of the local drainage systems including sewers, rivers and watercourses or does not infiltrate into the ground. The water ponds on the ground and flows towards low-lying land. This source of flood risk is also known as 'pluvial'.
- 4.3 The surface water mapping on the check long term flood risk gov.uk website shows the site is mostly at 'very low' risk of surface water flooding. Very low risk means that this area has a chance of flooding of less than 0.1% each year.
- 4.4 An effective and sustainable drainage system will prevent surface water flooding within the development. The EA's surface water flood risk map can be seen in **Appendix G**.

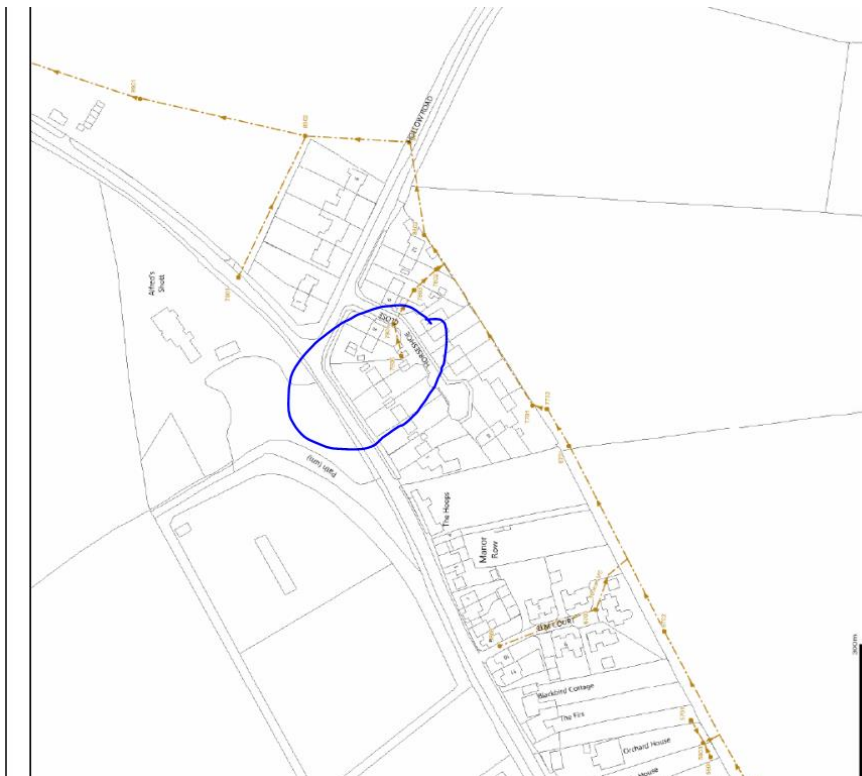
If the 29 or so trees are taken away from the woodland in front as is proposed, or if the ditches are poorly maintained, or simply the fact that there will be less earth to soak up the water, the development could easily cause even greater flooding, especially with climate change. Up to 24 houses could be directly impacted by floods- which equals between 13%- 16% of the village (based on there being between 150-180 houses in the village), which is a large proportion of at risk homes.

Whilst going to feed my friends horses/ponies on the proposed site, I was able to take a picture of the elevation of the site you can just make out the Ickleton Road houses. There is real potential for flash flooding.



Sewage system

Although this is merely an outline proposal, I am very concerned about the accuracy of the sewage map which has been presented to the Planning Inspectorate. This is because I know that there is a foul sewage pipe that runs down from our house into the garden and that is where other sewage pipes meet. This is not indicated on below map (circled in blue) and I am concerned about this inaccuracy because our garden has flooded twice-to my knowledge- once before we moved in, and then the Christmas of 2018. Thankfully because many houses connect to this pipe in our backgarden, the council are obliged to sort out the flooding. However, it does suggest that the sewage may struggle with more people as it overflowed at a period when the village would have been especially busy- Christmas. And since then, covid prevented an excess of visitors for two years. It is plausible that an extra 60 people a day using the sewers would create detrimental and dangerous situations to the surrounding houses. If we count how many houses this could affect directly, you looking at all houses at risk of floods (24) plus Horseshoe Close and Hollow Road, and this puts 64 houses at risk of being impacted by badly thought through sewage without any real new pipe being added. This is between 35% and 42% of the hoses in Elmdon being affected. (looking at between 150-180 houses). It is a valid worry therefore it is not clear from the proposal where the sewage would go- and that this map is inaccurate.



Lastly, in the statement of community engagement, no one has even spoken with us as a house directly affected - let alone worked closely. Their whole approach has been really disappointing and lacking in any meaningful care for residents on any level. The planning application is littered with inaccuracies and disingenuous information which embellishes the truth in the hope to gain permission to build. Sadly all of these actions has led to an erosion of trust between parties, a far cry from working with a community.

- 1.3 Furthermore para 132 states “ *Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.*”

I leave this email with the hope that the Inspectorate will come and visit Elmdon and not be taken in by the words in the Planning statement: there are no services in the village- and there aren't even pavements in some parts. Cycling here could never replace driving because of the hills, and because everything is too far away for it to be a real option making 4.41 and 4.42 questionable points:

- 4.41 Also, the Inspector noted: *The site is well located in order to access services within the village and includes an indicative layout that demonstrates that careful thought has been given to pedestrian linkages with the wider village. This includes upgrading the footpath within the site to provide separate access closer to the village for pedestrians and cyclists. (para 40)*
- 4.42 The Inspector also noted the opportunities for cycling and that such would reduce car dependence by a modest degree. The Inspector concluded that, given the proximity to other settlements and services available in the village, it was appropriate to conclude that the proposal encourages movement by means other than driving a car, and therefore accords with policy GEN1(e).

Very best wishes,

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