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**To:** [section62a@planninginspectorate.go.uk](mailto:section62a@planninginspectorate.go.uk) <[section62a@planninginspectorate.go.uk](mailto:section62a@planninginspectorate.go.uk)>  
**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Sent:** Monday, 6 March 2023 at 20:59:39 GMT

**Subject:** Planning Application S62A/2023/0015 Grange Paddock Ickleton Road Elmdon, Essex

Dear Sirs

I am a resident of [REDACTED] and I object to this planning application on the basis of sustainability. Elmdon is a village located in the north-west extremity of Essex and we have no sustainable facilities within the village and only one bus service (444). This is a school service to the Joyce Franklyn Academy Newport and the Saffron Walden County High School and runs only on school days, leaving the village at 07:50 and returning at 16:00. Even this meagre bus service is located 850m walking distance from the proposed site access on Ickleton Road, or around 1km walking distance for residents of the proposed dwellings. Elmdon has no shops, no public house (has been closed since around 2017), no employment, no public transport provision and no school. Residents of this village are therefore completely dependant on motorised transport to access employment and good and services. The National Planning Policy Framework (NPPF) 2021 notes at paragraph 10 that there is a presumption in favour of sustainable development. This development cannot be considered sustainable when there are no facilities located within the accepted walking distance (1.6km) for access to such facilities. All travel will depend on the use of private cars, except for secondary school access via the aforementioned 444 school bus service. Paragraph 9 of the NPPF also suggests that developments should have opportunities to promote walking, cycling and public transport use. This is clearly not the case here since there are no facilities within the village and walking distance or public transport options for travel for the majority of leisure, shopping or employment and education needs.

I have reviewed the supporting information and note several inaccuracies within the the various documents which lead me to believe that this application should be rejected.

### **Transport Statement by EAS**

At 2.15 the TS notes that parking would be in accordance with Essex Parking Guidance (2009) which is agreed at the stated level of 36 spaces for 18 units. However, this is not in accordance with the Uttlesford District 'Local Standards' that require dwellings with 4 or more bedrooms to be provided with at least 3 car parking spaces.

At 3.3 the TS notes that the bus stop for the 444 (school) service is located adjacent to the church. The 444 does not stop at the bus stop in this location but stops at the bus stops located on High Street adjacent to Kings Lane. This is around 200m further from the application site.

At 3.4 the TS notes a number of other bus services that the consultant considers to be available to residents of the proposed dwellings. These bus services are located in other villages such as Chrishall and Ickleton and cannot be reached other than by the use of a car unless walking on an unlit country lane with no footways. These bus services (and the 444) are all located beyond the accepted 400m distance considered reasonable for access to a bus service.

Also at 3.4, the TS mentions that there is a child minding service located in the village. This service closed prior to Covid and no longer exists. As noted above, this village is not sustainable and has no local facilities except a church.

Of the other bus services noted in the TS, none operate to bus stops in Elmdon and two are not even public bus services!

At paragraph 3.13 the TS states that Ickleton Road is 6m wide. This is not. In the vicinity of the application site the road is only 5.3m wide. It also states that there are 'two marked lanes' when there are no centre road markings along Ickleton Road except in close proximity to the junction with High Street to the west.

At 3.18 the TS notes that there is a footway along the southern side of Ickleton Road but does not indicate how wide this is. This footway varies in width but is generally 1.4m at its maximum and around 700mm at its narrowest. The accepted minimum desirable width for a roadside footway is 1.8m and therefore it is clear that the current footway is substantially below this accepted width.

At 3.21 the TS notes a public footpath (PROW) Elmdon 7 is located 130m to the west of the application site and suggests that this can be used to walk to Littlebury Green. This is an unsurfaced track alongside a field that has no intrinsic value in terms of accessibility for facilities, services or employment. This footpath is part of the wider network of PROWs which serve a leisure function for recreation and dog walking.

At 4.2 the TS indicates that the current access serves Alfred's Shot, a single large residential dwelling owned by one of the co applicants. The plans submitted do not show how this existing property would be served for vehicular access. The TS mentions rather glibly that 'the access will be adapted to serve the development and the existing dwelling' but this is not shown anywhere in the application documents. Essex County Council require that side turnings and access points should not be located within 20m of a junction and that certain geometrical requirements are met, including a 15m straight section from the channel of the main road and that the gradient should not exceed 2.5% (1:40) for 10m from the main road channel. The plan located at the rear of the TS indicates that a raised table ramp would be placed 6m from the edge of Ickleton Road and this does not comply with the ECC gradient requirement. The appropriate spacing of road junctions is set out in the Essex Design Guidance available online. This guidance suggests that junctions on opposite sides of the road should be separated by a distance of at least 50m while the proposed site access junction is located only 15.5m from Hollow Road and would create a 'left right stagger' arrangement. This arrangement is noted in the Essex Design Guidance as being undesirable because it generates safety concerns. Vehicles emerging from Hollow Road to turn right into the new development could have to wait within the area of the junctions. It is preferable for left right staggered arrangements to be designed out. It is also noted that ECC require a Stage 1 Road Safety Audit to be provided at planning application stage to ensure that proposals have been reviewed by an independent road safety expert prior to the LHA accepting that a development could be adequately and safely served for vehicular access. No RSA is available for this proposal from the planning portal.

At 4.3 the TS considers visibility at the proposed site access and appropriate splays are indicated for a 30mph speed limit in accordance with the guidance provided in Manual for Streets. However, I note that a significant length of mature roadside hedge would need to be removed in order to provide this level of visibility. This would harm the rural nature of the roadside frontage and remove habitat for wildlife.

At 4.13 the TS describes servicing arrangements and also provides vehicle tracking for the proposed access junction. None of this considers the roadside parking that is used along the southern side of Ickleton Road along the entire frontage of the application site and up to Hollow Road. The tracking plan for the refuse vehicle clearly uses the entirety of the carriageway and would not be able to access and egress as shown due to on-street car parking. A number of the houses along Ickleton Road have no in-curtilage parking available. It should also be noted that the school bus transport for children attending Chrishall Primary school picks up and drops off each school day from this location (opposite the current driveway to Alfreds Shot).

At 5.1 the TS describes the use of the TRICS database for calculation of vehicle trap generation of the proposed development. Given the rural setting at the edge of the small village that has no sustainable transport connections, no employment and no facilities such as shops, it is surprising that the consultant has chosen to use sites within the TRICS database

that are 'edge of town' and 'urban area' when there are sites available within TRICS that are located in villages. In my opinion the TRICS data is not representative of the characteristics of residential travel in Elmdon.

In summary the TS fails on many counts to accurately describe the setting and transport networks available in the local area and seeks to paint a picture of a sustainable location which is a considerable mis-representation of reality for the application site.

### **Design and Access Statement**

The D&S states that the footway along the southern of Ickleton Road provides the opportunity for residents of the proposed development to 'walk to existing services within the village' at paragraph 1.6. Where are these services that the residents will be walking to? Certainly not in Elmdon and not within the usually adopted 1.6km walking catchment!

At 4.49 the D&S talks about the bus services available. As I note above, there is only one (school) bus service (444) that is available in Elmdon. The other services noted within the TS do not serve this village. Elmdon is not a sustainable village! There are no shops, employment, public transport services or other sustainable facilities available to the residents of the proposed development. It is therefore likely that all travel associated with the development would be by private car.

### **Flood Risk Assessment**

In terms of flooding risk the FRA report has failed to note that there is a history of flooding along Ickleton Road and that the existing roadside ditch is both inadequate and poorly maintained. The site is elevated above the existing road and the houses located along the southern side, some of which are at a lower level than the road surface. I note from the FRA report that the exceedance route for flooding events above the 1 in 100 year plus climate change tested, flood water would fall with the ground levels to the south. This would be directly to Ickleton Road and the houses located there. The proposal therefore represents a flood risk to existing residential properties.

I also note that surface water runoff would be directed to ground but that soakaways are proposed to be at least 3.0m deep and into the underlying chalk. Chalk is a soft rock that is dissolved by water and the proposal therefore risks the creation of sink holes where surface

water runoff is directed to local points within the site. I also note that the site is located within an aquifer catchment.

There is no consultation response from the Environment Agency available on the planning portal and it is imperative that this proposal is reviewed by the appropriate EA department before the application is determined.

In conclusion this planning application is supported by flawed technical documents that have, at the current time, not been commented upon by the local highway authority, the lead local flood authority or the Environment Agency. A planning decision should not be made until the consultation responses have been received from these statutory consultees. The vehicle access proposal should also be subjected to a Road Safety Audit carried out by an independent safety expert. The NPPF supports development in sustainable location where there is a range of travel options and access to shops, services, public transport and employment without the need to travel by private car. This application is proposed on a site that has none of the above and therefore should be rejected. I respectfully ask that the Planning Inspectorate refuse planning permission for this development.

Yours faithfully

Mr S Williamson

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