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Inquiries and Major casework team,
The Planning Inspectorate,
2 The Square,
Temple Quay,
Bristol. BS1 6PN

6th March 2023

Dear Casework Team,

Planning Application ref: S62A/2023/0015

I refer to the application that has been made to you for a housing development on Ickleton Road, Elmdon, Essex. CB11 4GR.

Applicants Case.

Having read the Applicant's case in detail it is clear that the proposal is for a *"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."*¹

I understand that "sustainable" has 3 interdependent overarching objectives, Economic, Social and Environmental². However, I am not at all clear that the Application will achieve these objectives:

1. The economic objective looks for a "competitive economy..... with land in the right place.....to support improved productivity". With respect to the Applicant, I question how this application, on the edge of a small village without transport links (except by car, apart from the school bus), can be judged to be in "the right place" to "improve productivity". Rush hour periods of travel into Cambridge and other neighbouring towns is often very extended, which inevitably has an impact on the levels of productivity which our economy so desperately needs. If this is truly the objective required of a new development, then surely it should be sited, at least close to transport links, perhaps better closer to the relevant centres of activity.


¹ Design and Access, Heritage, Landscape and Planning Statement: Applicants case 4.1.

² NPPF section 8

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2. The Social objective also appears, with respect, to be less than clear on examination. The village community, in its own widely consulted on, Village Design Statement prepared in 2019 accepted the need for moderate development. And indeed, since then a number of houses in the village have changed hands to the benefit of us all. We are not static. Obviously, I cannot comment on the design qualities of the new houses, since this is only an outline application, but we have just 3 accessible “services and open spaces” within the village:
- a. The Church, in the centre of the village and readily accessible from the site on foot. There are pavements all the way.
 - b. The Village Hall, which is very small, and originally just a “reading room”, opposite the church.
 - c. A fine cricket ground at the far end of the village, which is also within walking distance, although I suspect the new residents might well choose to travel there by car.
 - d. What we don’t have, which applied in the cases cited of both Manuden³ and Henham⁴ are:
 - i. A primary school: the nearest is in Chrishall approximately 3 miles away (Elmdon’s is now a private house). Other schools are in Saffron Walden, Newport and Cambridge (6, 7 and 12 miles distant). There is a school bus locally but not to Cambridge. Many residents choose to take children to school by car.
 1. The inspector should also be aware that places at local schools are in very short supply. I understand that new residents in Saffron Walden are having to accept places at schools in Dunmow.
 2. Chrishall School is also at capacity.
 - ii. An operating pub. Ours has been closed for around 10 years. It was acquired just before lockdown by a new proprietor, but after extensive refurbishment, which I understand is not yet complete, has yet to reopen.
 - iii. A local shop, as enjoyed by Henham. The last shop in Elmdon is now a private house: the nearest is in Ickleton around 3 miles distant.

³ Appendix A para 36. Manuden has access to a comparatively good range of day to day services, including a community centre, primary school, church, public house, and a range of sporting facilities

⁴ Appendix B para 50. Henham is a rural settlement served by a number of facilities including a primary and nursery school, a part time shop/ post office, the Old School Community Association Hall, the Henham and Ugley Sports and Community Hall, the Village Hall, Henham Tennis Club, St.Mary’s Church, the Church Hall, The Cock Inn and a gym.

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- iv. Even mobile telecoms are patchy. Nor is there a local bus service, or a doctor's surgery, or a Post Office. Let alone a gym, a garage or a Coffee Shop. All of which would provide local employment opportunities.
 - e. All of these missing services suggest that any development in the village will inevitably lead to more car travel, as residents seek them elsewhere.
 3. I must also question whether the Environmental objective, already I suggest, undermined by some of the failings noted above, is satisfied. Does the proposed development "enhance our natural environment"? Uttlesford needs more housing, but on this scale in Elmdon with its lack of services?

There are a few additional points which the Inspector may choose to notice:

1. The SuDS survey⁵ notes that sewer flooding "would remain in the public roads and would not flood onto the site". This seems to refer to the site itself and to the Thames sewer 30m south of the site in Elm Court Road. But it begs the question of what would happen if such a flood were to occur on any sewer connecting the site, on a level above Ickleton Road, to the Thames sewer mentioned. The houses on Ickleton road would themselves be at risk of flooding. Some already have to use sandbags to keep rainwater at bay in times of heavy rainfall – and such extreme events are expected to increase.
2. This same survey, in the same paragraph, notes that "levels along the southern boundary [of the site] show to be 2-3m higher than the levels found along Ickleton Road." I have spoken to the occupants of No 2 Elm Court, on Ickleton Road immediately opposite the site. From their bedroom windows they can see straight across the site, and this will apply also to their neighbours. Obviously, the reverse would be true. Whilst this view might be obscured in summer when the hedge is in leaf, at other times the bare branches would mean that intrusive observation from the site into Ickleton Road housing becomes a real probability.
3. The Application states that "There would be a need for some lighting within the development, for security and safety reasons"⁶. Residents of the village are concerned about intrusive public lighting. There are no street lights in Elmdon, and residents appreciate the pleasure of the

⁵ SuDS Strategy: page 8 para 4.3 (should be 4.13 but the numbering in the report seems to have gone astray)

⁶ Design and Access, Heritage, Landscape and Planning Statement: 4.31

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night skies. Public lighting on an elevated platform such at the Application site would be highly unattractive for local residents. It would also be a deterrent to wildlife, much of which is now forced to be nocturnal.

4. When it comes to waste disposal/bin collections, is it seriously proposed that in the case of all 18 residents “Bins would be wheeled to the street by residents on collection day”⁷? The large bin lorries would surely require access to the site direct for such collections, with implications for the internal roadways and access arrangements.
5. The proposed access on the south-eastern end of the site is immediately opposite the point where the school bus turns round on its journeys. This has safety implications for this particular access point.
6. It seems there has been no direct interaction with the residents of the houses immediately opposite the site on Ickleton Road, despite claims that such arrangements would be instituted ahead of and following the brief public consultation in June 2022⁸. The Statement of Community Involvement cannot be regarded as having had quite the involvement it claims.

I have one final request: that the Inspector should visit the site and the village to see in person what exactly is proposed on the ground before reaching any decision.

Yours Faithfully,

Edward Tozer

⁷ Design and Access, Heritage, Landscape and Planning Statement: 4.48

⁸ Statement of community involvement 1.5