

3 March 2023

Inquiries and Major Casework Team,
The Planning Inspectorate,
3rd Floor,
Temple Quay House,
2 The Square,
Temple Quay,
Bristol,
BS1 6PN

Dear Inquiries and Major Casework Team,

Section 62A Planning Application: S62A/2023/0015 - Grange Paddock, Ickleton Road, Elmdon, Essex, CB11 4GR (UTT/23/0246/PINS)

We are writing to object to the proposed planning application for 18 dwellings on Grange Paddock, Ickleton Road, Elmdon.

We are aware that the Uttlesford District Council Planning Committee is considering their position on the development at their meeting on 8th March at 10am, and accordingly we have copied this letter to the Planning Committee.

We provide further detail below, but our objections can be summarised as follows:

- 1. **Unsustainable** The development will not represent sustainable development the adverse impacts significantly outweigh the limited benefits of the proposal.
- 2. **Village Design Statement** The application is contrary to the Village Design Statement.
- 3. **Application errors** A number of statements made by the applicant are, at best, misleading (at worst, errors) especially in relation to level of consultation carried out with the village and the concerns not articulated in the application. These have also been replicated in the summary prepared by Uttlesford Council for the Uttlesford Planning Committee meeting.
- 4. **Community facilities** The development would not enhance the viability of existing community facilities, as they are limited to a church (services once a month, with a shared rector across 4 parishes) and a community hall with a capacity of approximately 30 people (available to hire).
- 5. **Infrastructure** The development would put further pressure on the village infrastructure (e.g. sewage, roads, and pavements) and therefore would require significant s.106 contributions to be made to bring these us to the required standards.

- Countryside impact There would be significant impact on the openness of the
 countryside, with the scheme being prominent in the village and particularly
 conspicuous from the iconic Icknield Way Trail (on Freewood Lane, between Pigots and
 Freewood Farm).
- 7. **Character** The development would completely transform the look and character of the village.

1. Unsustainable Development

Economic

The proposed scheme is not expected to provide any economic benefit to the village, on the basis that labour will be provided from outside the village, and that there are no amenities in the village for any of the contractors to utilise.

No long-term economic benefit can be foreseen, as the level of development would not be sufficient to make viable an increase in Elmdon's amenities (e.g. a primary school, medical services or shops).

This is in contrast with similar applications in Manuden and Barley, both of which have a primary school, shops, pubs, and other villages amenities.

Elmdon has around 350 occupants. The increase will be significant (if each home had on average 3 people, this would represent a further 54 people – an increase of over 15%), but no economic benefit of an increased population has been identified.

Social

As part of the Village Design Statement, the village identified a need for 2-3 bed family homes to be built for sale. This has been the case for 6 of the eight properties that have been granted planning permission since 2019.

The applicant notes that they are willing to consider including a percentage of affordable housing in the development, and this would be 7 out of eighteen dwellings (40%).

Our first concern is that this is not a formal part of their application, as they have marked that all homes built will be sold at market value.

The very limited support in the village for the development, but primarily by those who have expressed frustration at not being able to get on the property ladder (due to the lack of homes which are in their price bracket).

However, it is noted that whilst 7 dwellings are proposed to be offered as being 'affordable', only two are suggested as being available for sale (at a price not exceeding £250,000). It is proposed that the remaining 5 affordable homes will be purchased and let by a housing association.

It is expected that the remaining 11 homes will be marketed at their full market value. Although it will depend on a number of factors, based on the proposed square footage of the dwellings and comparing to similar developments these are likely to be marketed from:

- £450k plus for the 2 three-bedroom semi-detached dwelling...
- £675k-£900k plus for the 5 four-bedroom dwellings
- £1,350k plus for the 4 five-bedroom dwellings

At these levels, there will only be four dwellings available for sale at less than £500k, with a total footage of 4,000sqft. The majority of the development available to purchase is either 4 or 5 bedroom homes, with a total footage of 25,465sqft. The affordable element for sale is there a very small footprint of the overall development (less than 15%).

Our second concern is therefore that the proposed development is not a significant increase in 2-3 bed family homes for sale, as identified in the Village Development Statement (and identified by those in support of the development).

Environmental

It is difficult envisage how the development will benefit the local environment. The proposal will remove a significant section of the well-established hedge, as well as removing a number of trees on the site. There is a thriving local population of bats and owls, and a number of other smaller wildlife that would be disrupted as a result of the development.

The impact of a significant increase in concrete would increase rain run off onto the Ickleton Road, an area that is already prone to flooding.

Given the lack of public transport (as the school bus should be discounted as not operating for over 20 weeks of the year), the increase in car traffic in the area would be significant.

2. Village Design Statement (VDS)

In 2019 the village undertook an extensive consultation exercise where 150 out of 269 households responded.

The application fails to meet a significant number of the VDS guidelines and lacks detail to access a number of others. Of most significant, the proposal:

- Is outside the development boundary
- Is on a new greenfield site, rather than priotitising developed sites.
- Fails to conserve the rural character of the area, and be sympathetic to the rural nature of the village

Given the absence of a current Local Plan for Uttlesford District Council, the Village Design Statement should be given greater weighting.

It is noted that since the VDS was prepared a number of houses have been built in the village (or have had planning permission granted), in line with its guidelines. In total these have contributed a further 8 dwellings to the UDC targets.

3. Application information

Community Engagement

The applicant includes a statement of community engagement, dated December 2022.

The documents notes that in early 2022 the applicant approach the Elmdon Parish Council to seek advice on how best to inform local people. It is noted that the Council recommend that this should be one weekday evening, and should include the applicant's draft proposal for the siting and layout of the scheme. It is noted that the agreed date was Friday 17th June 2022, and that the applicant put up a number of posters in the village to invite local residents, and representatives of the applicant attended. It is noted that display boards were set up and informal discussions took place with local people and their representatives. It is finally noted that the display boards also included the applicant's first proposals for the scheme.

We feel that this summary of events is disingenuous.

A number of points are inaccurate, or misleading:

- A small number of A4 posters were placed in the village only 2 days prior to the meeting (there was no flyering through letterboxes)
- The posters said, "OPPORTUNITY TO PREVIEW A PLAN FOR INCREASING VILLAGE AMENITY AND HOUSING OPPORTUNITIES FOR ELMDON".
- No display boards were present at the meeting, but rather a single large plan placed on a central desk for attendees to review.
- The representatives were unable to answer almost all questions raised.
- No visible records of the meeting were taken or made available after the event.
- The applicant notes a selection of the objections raised at the meeting, but other than the first broad objections, has only drawn out those that are cosmetic, and it is capable of remedying.

Given that a previous meeting had indicated a strong rejection of a prior proposal, our view is that the applicant undertook what it considered to be the bare minimum to engage with the local community. However, we consider that it was substantially below the minimum required (and expected given the magnitude of the development).

A village consultation was then conducted over the following few weeks by the Elmdon Community Group, to which more than 50% of households responded. Of those respondents 92% were not in favour of the development.

A number of points made in the application are inaccurate, and dealt with elsewhere in our objection (e.g. sustainability of the development).

Inclusive Access

The applicant notes that the proposals have been developed to make provision for people with disabilities including suitable highway and pedestrian access for people with disabilities. Whilst the development itself may be able to cater for access requirements, there is a

significant issue with those residents then being able to access local amenities (being those described in the application).

The quality of the pavements, the parking of cars on pavements, and obstructions on the pavements (e.g. at the Pump House) makes access to those amenities in a wheelchair impossible. The statement included in the application is therefore not fully considered. To enable access to the amenities, significant work would need to be undertaken (at the cost of a developer, and mandatory under s.106 agreement) to access facilities.

Transport

It is noted that due to the lack of amenities in the village, the lack of public transport (there is one bus at 7.50am on school weekdays to Saffron Walden, returning to Elmdon at 4pm), a car will be essential for each dwelling.

Being surrounded on all three access roads to the village by steep hills would impact the ability to cycle easily to neighboring villages.

The applicant includes a transportation statement and draws the Inspectorate to the availability of public bus services and that the traffic generated by 18 residential units would have an imperceptible impact on the local road network.

As there is only a school bus service to Saffron Walden (other than small minibuses organised by local schools), those occupying the dwellings and working locally (or beyond) will need to drive.

The applicant notes that there is a bus from Coploe Road (Ickleton), but this is almost 5km from the proposed site, and involves a climb of over 100m on the return journey. There is no bus link from Elmdon to Coploe road. This is therefore not considered to be accessible to those in the village without the use of a car (or good mobility).

It is noted that there is very limited local employment in the village, and almost all of the working population travel outside of the village to work (including those who undertake some ad hoc work in the village).

Given the mix of houses proposed it is expected that each household will be making a journey between 7.30am and 9am – either going to work or taking children to school. Indeed, this could be 1 or 2 cars per household. This would be mean an additional 18-36 car journeys in the morning and again in the afternoon.

This is far higher than is included in the transport statement.

Given the location of the entrance to the development, which is on a blind corner (with less than 40m visibility in either direction), this is expected to have a material impact on congestion in the village between those times.

4. Community Facilities

Existing facilities

The applicant notes that the development would be in very easy walking distance. And that the presence of local services would also negate the need for residents to travel by car for some day-to-day functions.

However, these would be limited to attending church (which has a service once a month, and limited events otherwise) and visiting the village hall (which is available for hire). Otherwise, the only other village amenity is the cricket pitch and pavilion, which is in use over the summer months.

The statement is disingenuous, as there are no day-to-day activities that would not require transport by car. The sole purpose of making this statement appears to be to draw a comparison to the recent appeal in Manuden. However, Manuden has a primary school, 2 pubs, shop, restaurants, and cafes.

The comparison is therefore wholly inappropriate and misleading.

New facilities

Over the last 10 years, the applicant has put forward a number of proposals to develop the site, with a number of village benefits being proposed. The original proposal was framed around reopening the village pub (which closed in May 2013), with the funds to do so being generated by a development of over 30 homes. This was rejected on a number of grounds.

Similarly, the current proposal includes the creation of a playpark at the western end of the development (albeit not accessible directly from the development).

We have a number of concerns with the proposed playpark:

- It is proposed that the upkeep of the park will be the responsibility of the 18 dwellings. However, as 7 will be affordable homes, this would place the majority of the burden on 11 dwellings, which would seem unrealistic (or risk that it would not be, or not be capable of being, maintained in the future).
- There is no direct access from the development to the playpark, with access requiring the occupants of the dwellings to go down onto the main road, to cross the road and then to recross the road (as there is no pavement on the north side of Ickleton Road at that point).
- Whilst a playpark would be welcomed by a number of residents in the village, it needs to be a village asset that is owned (or let to) and run by the Parish Council. This would suggest that if such a park is to be provided as part of the planning that a s.106 contribution should be made such that the income from that contribution should be capable of maintaining the playpark in perpetuity (including landscaping and repair of equipment).

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5. Village Infrastructure

Sewage

No information has been provided on the impact of the development of the operation of the existing sewage works. It is anticipated that these may need to be significantly upgraded to ensure no effluence overflow and continued operation. Prior to the consideration of the application, we would recommend that a full sewage survey be carried out and made available to residents.

Roads & Pavements

The roads are narrow and therefore, for those houses which do not have off-street parking, cars are often parked partly on the pavements and partly on the road.

This affects the accessibility of the amenities in the village (for example for those with prams and disabilities). No information has been provided as to how the developer expects these challenges to be met.

Traffic

In addition to the points noted on the increase of traffic resulting from the additional 18 dwellings being occupied, there has been a significant increase in the number of traffic related incidents in or near the village over the last 4 years.

Our 2 cats were separately run over outside our house in 2019 and 2020. And most recently Amelia? As I'm named in sign off? was involved in a car accident (writing off our car) at the intersection of the Ickleton Road and Royston Lane (1000m east of the development). Indeed, this junction has been the site of 4 similar accidents in the last 4 months, where cars approaching from Royston Lane to the North did not stop at the junction.

6. Village Character

Elmdon has some 60 or so listed buildings and has maintained its character as a quintessentially English village. Although it has lost a number of its local amenities, it has retained the character of the village. Where development has been undertaken, this has been in sympathy with the current design and layout of the village (being on the roads). Where development has been undertaken away from the roads, this has been invisible from the roads, and the surrounding paths and bridleways.

The proposed development is a significant departure from the current layout of the village and would materially impact its character.

7. Countryside and the Icknield Way Trail

Finally, Elmdon is blessed as being a village of outstanding natural beauty, and one of Essex's and Uttlesford's highly regarded villages. This is especially visible when coming West on the

Icknield Way Trail along Freewood Lane. As you approach West, the village comes into view, with the Church in the background.

This elevated vista provides an overview of the Eastern end of village. It shows the village in the valley below, and the fields set above it to the North. The proposed development would be in the forefront of that view — being elevated and highly visible.

In our view this would have a material impact on the view of the village, and on the enjoyment of walkers on the Icknield Way Trail.

Yours Sincerely,



Euan & Amelia Sutherland