

I strongly object to the proposed development on Grange Paddock, Ickleton Road, Elmdon, Essex (Application reference: S62A/2023/0015) on the following grounds:

- Impact upon local biodiversity
- Impact upon local historical character
- Impact upon dark skies
- Increase in already unacceptable flood risk
- Lack of local demand

I don't believe there is a local need for the development and I believe it will have several very negative impacts upon the relatively unspoilt village of Elmdon. I don't believe this damage can be successfully mitigated against in a development of the proposed scale at the proposed location.

Impact upon Local Biodiversity

Elmdon sits within a largely arable, intensively farmed landscape. This makes the mosaic of woodland and grassland habitat found around the village very valuable as a refuge for biodiversity and **this should not be underestimated in its importance both locally and nationally, particularly in the face of ongoing, national biodiversity loss.**

Bats

Elmdon has seven species of bats, all of which are protected and one of which species, the barbastelle, is a Habitats Directive annexe II species. Several of these species are known to roost in Elmdon church which is only 350 metres from the proposed development site. It is very likely that many of these species commute and forage along the hedgerows and across the pasture on the proposed development site. Pasture presents a rich hunting ground for bats due to the insects that are attracted to the animal dung, as well as the pollen and nectar in the grassland sward and hedgerows. **This important element of the bats' habitat would be lost if the pasture were replaced by housing, further threatening these endangered species locally.**

Further, it is well known that artificial lighting can affect roosting bats, but it can also affect the feeding behaviour of bats away from the roost. Slower flying species (lesser horseshoes, greater horseshoes and the 6 *Myotis* species) avoid illuminated areas and therefore lose foraging grounds if they are lit. This results in slower flying species having to use poorer quality foraging sites and losing out on prey, which are attracted to the surrounding lit areas, a so called 'vacuum effect'. **A housing development and its associated lighting will undoubtedly affect the commuting and foraging routes of Elmdon's seven species of bat**, such routes have been shown to be avoided if there is artificial light spill onto these areas.

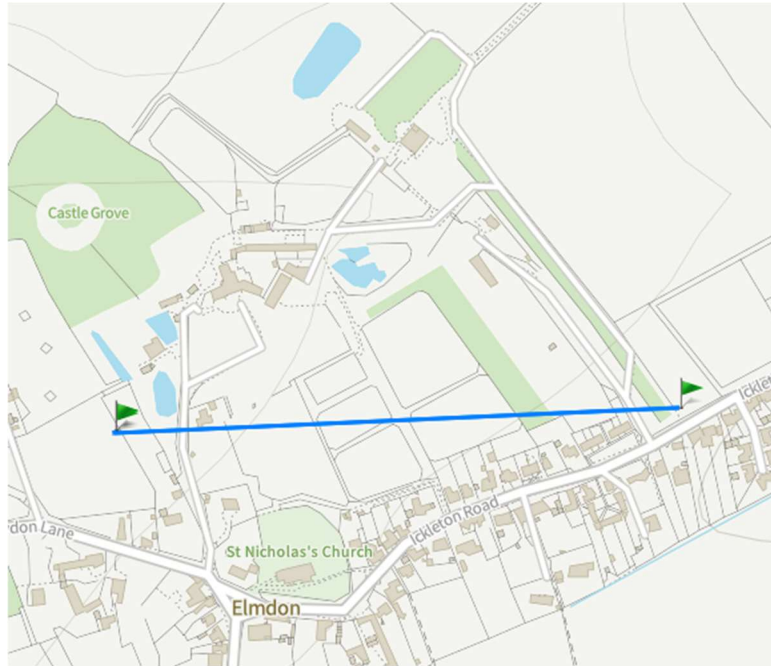
*****Where is the Preliminary Ecological Appraisal in the planning documents and why hasn't a Biodiversity Management Plan been submitted with the plans?*****

Great crested newts

There are six large ponds within 500m of the development site. A pond density such as this, in a mosaic of habitat ranging from broadleaved woodland, neutral grassland to gardens (all offering excellent connective terrestrial habitat for great crested newts) **could quite conceivably be an important complex of breeding ponds for this European Protected endangered species.** Villagers regularly report seeing great crested newts in ponds around the village so it would be reasonable to assume the excellent terrestrial and pond habitat on offer within 500m of the development would also be being used by the species. Great crested newts can travel 250m in one season and further

with the right habitat available. **The impact of the development upon the terrestrial habitat for great crested newts has simply been dismissed in the Biodiversity Checklist.**

Fig 1: Map showing six large farmland ponds within 500m of the proposed development site (the blue line between the green flags is 500m). There are actually two more large ponds which are not mapped (but can viewed on google earth), not to mention several unmapped garden ponds along Ickleton Road.



A 'Biodiversity Checklist' has been submitted with the planning application, however it should be noted by the planners that **this form has been completed incorrectly as follows:**

- 1) The Biodiversity Checklist was completed in 2018 and so is **out of date** and does not reflect any likely impacts on **current** biodiversity on or around the site.
- 2) Table 3.1 Protected and Priority Species Checklist - The checklist says the development is not within 500m of any ponds. Being a 'major' development of more than ten houses the upper distance should be applied here rather than 100m, however the applicant has erroneously ticked the 100m from ponds box, as if it were not a major development. Therefore **the checklist avoids taking into account the fact there are at least 6 large ponds within 500 metres of this major development site** - to the west of Grange Paddock.
- 3) Table 3.2 Species Evaluation - In this section **the European Protected Species and Nationally Protected Species box should be ticked 'yes'** as there are 6 ponds within 500m of the site.
- 4) Although they have ticked 'yes' to several columns identifying habitats associated with protected species (grassland, pasture, hedgerows and woodland) recognising there is a reasonable likelihood protected species will be present, **they have given no statements in 3.2 Species Evaluation (as required by the form) to explain why they don't believe there is a risk to these species.**

Impact on Local Historical Character

Elmdon is a rural parish located on the chalk uplands that define the county boundary between Essex and Cambridgeshire. This is significant as the boundary represents a transition between the open, champion landscape of the Cambridgeshire plain (with its larger, linear settlements - and over development) and the more ancient countryside of North West Essex with its small villages, often focused around village greens, with scattered farmsteads and hamlets nestled in between.

As recognised by The Hundred Parishes Society¹, this area is largely unspoilt and is richly endowed with many fine examples of agricultural and built heritage. For example, it has over 6,000 listed buildings. As a proportion of total housing stock, there are five times as many listed buildings as in England as a whole. In particular, there is a very high concentration of pre-1700 architecture, Grade I-listed churches, village greens and conservation areas. In addition, there is an exceptional depth of visible agricultural heritage with ancient field patterns, ancient woodland, winding roads, sunken lanes and ancient hedgerows.

Elmdon is a particularly fine example of a village within The Hundred Parishes and **although The Hundred Parishes area may not be recognised in planning in the same way an AONB is, it should be an important consideration in deciding the scale and appropriateness of development in the area.**

It should also be noted that **most of Elmdon village has been designated as a Conservation Area since 1978**, recognising that there has been little modern development here and **seeking to preserve its historic character.**

The proposed development is located alongside the main approach to the village; **it would be the first thing seen of Elmdon upon entering the village from the Ickleton Road.** It is directly opposite an important listed thatched building called The Hoops which is the first listed building you come to as you enter the village (a former farmhouse and later a pub for farm labourers) and which sets the scene for the historic, agrarian character one finds as one continues into the historic heart of the village. Alongside The Hoops is Manor Row, a row of labourers cottages dating back to the 18th Century which would have housed labourers of the Manor, hinting at an earlier feudal system. **This quiet rural scene and the historic context it lends to the main approach to the village would be greatly undermined by a development of 18 modern houses looming above it** in an elevated position, complete with the associated increase in traffic, light pollution and noise.

Impact on Dark Skies

In addition to the impact upon bats noted in the biodiversity section above, scientific evidence suggests that artificial light at night has negative and deadly effects on many creatures including amphibians, birds, mammals, insects and plants. **The Elmdon Village Design Statement recognises the need to keep lighting to a minimum in the village** which shows humans also value dark skies. Very few villages have truly dark skies in the UK anymore and Elmdon is unusual in this respect. In addition to the value of dark skies to biodiversity, it can be considered part of the villages' historic character that residents are keen to preserve. **A development of 18 houses, even with minimal lighting, would greatly dilute the atmosphere and darkness of the village at night.**

¹ The Hundred Parishes Society was established to recognise and celebrate the distinct local character of this large, attractive, gently-undulating area, around 450 square miles of northwest Essex, northeast Hertfordshire and southern Cambridgeshire. Elmdon sits within this area and is a particularly fine example of its character.

Increase in already unacceptable Flood risk

Ickleton Road suffers from flash flooding due to a combination of poor, outdated drainage, poor drain maintenance and the depressed camber of the road outside the cottages along Ickleton Road (directly opposite the proposed development site), which nowadays sit lower than the road level due to the addition of successive modern road surfaces over the years. This combination means these cottages flood in certain weather conditions and suffer from year-round damp issues, including damp walls, high humidity, rotting carpets and wet rot in floor joists. These issues have not been resolved, despite being raised on a regular basis with the Local Authorities over a period of more than a decade. **Developing the elevated fields opposite these cottages will clearly increase the risk of flash flooding and would simply not be fair to the existing residents.**

Lack of Local Demand

There is no evidence of local demand for a development of this scale and type. **The proposed development takes no account of the Elmdon Village Design Statement²**, carefully consulted on and published by Elmdon Parish Council in 2019. This statement outlines the type of development felt to be appropriate and needed by the village, namely small scale, affordable housing on brownfield land (i.e. not major housing developments expanding the village envelope using greenfield sites). The statement also highlighted the importance of retaining green space and the villages' rural feel and protecting 'the open landscape and landscape views around the village'. **The proposed development would be damaging to several views across the village from surrounding footpaths and hills.**

Housing supply is not an issue in the village, at least two properties are empty/ unlive in, there are rental properties available in the village and cottages regularly come to market each year for those wishing to move to the village at a reasonably affordable price (relative to house prices in similar villages in East Anglia) for example:

- Rose cottage was purchased for £228,00 in May 2021
- 4 Manor Row was purchased for £365,000 in July 2021
- The Old Vicarage Cottage was purchased for £405,00 in May 2021
- Three Cottages at The Glebe were sold for between £120,000 and £435,000 in 2019.

There is also a wide range of larger, more expensive properties which come to the market each year.

The price of houses on the proposed development are unlikely to be as affordable as those listed above, so the development does not answer a local need for supply of housing, nor does it reflect the type of housing identified as acceptable by the Elmdon Village Design Statement (small scale development of low density, affordable, 2-3 bed housing).

By Jilly McNaughton

² Elmdon Village Design Statement:

https://docs.google.com/file/d/1sEI2jTKjix2EUx19xCSTTWa1Qbe4LpR_/view