

To the Inquiries and Major Casework Team,

Reference: S62A/2023/0015 Proposed development at Grange Paddock, Ickleton Road, Elmdon, Essex, CB11 4GR.

I am writing to **OBJECT** to the proposal for the construction of 18 dwellings on a greenfield site beyond the settlement limits in Elmdon.

Main points to consider:

- Proposal is on a greenfield site (grade II agricultural land) beyond the settlement boundary. This ignores guidelines and criteria presented and recommended at all levels of governance – Village Design Statement, Uttlesford Local Plan and the National Planning Policy Framework (NPPF).
- Inconsistencies/omissions throughout the application. The services referenced in the Design and Access Statement for example do not exist in the village.
- Impact on already inadequate infrastructure. The incidence of flooding and traffic congestion will increase, namely due to the proposed site location and the scale of the development.
- A prerequisite of sustainable development in the NPPF is to consider ‘3 overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways’. It is not evident the application has even attempted to meet these objectives.

Services and Infrastructure

The Design and Access Statement suggested that the proposed development would ‘*enhance the viability of existing community facilities and services*’ (§4.1).

In truth, these ‘*facilities and services*’ are fictitious as Elmdon is a rural village in an isolated pocket of north-west Essex with comparatively limited accessibility, even to other areas of the Uttlesford district. Why the application has felt the need to mislead must be questioned. The village has no public house (closed 2013), no shops, there is no school in the village and only one school bus service (444) that operates once daily and only during school term time. Bus routes cited in the application (31, 7, 101 and 132) do not serve Elmdon. There is no longer a child minding service and the nearest school is oversubscribed. The decision to place additional demand on services/facilities that are either limited or nonexistent in the village must therefore be scrutinised.

The Design and Access Statement also refers to an apparent ‘*shortfall in terms of supply*’ (§4.1). Elmdon had 28 registered sales between 2018-2021. In a village with c.120 dwellings as stated in the Village Design Statement (2019), housing within the village is evidently readily available. Small brownfield/infill sites have been developed, yet

development of this magnitude cannot be justified in Elmdon. Increasing the housing in Elmdon by an estimated 10-15% by developing greenfield land is unnecessary and unsustainable. The proposal also sets a precedent for future development within the village; the applicant has already stated intentions to conduct further development.

The Design and Access Statement accepts *‘that the proposal represents development beyond the existing defined settlement limits’* (§4.3). The proposal site is outside the village envelope. Referencing Uttlesford Local Plan (2005), the Design and Access Statement presents the Local Plan as being obsolete due to its date. It remains applicable in the case of Elmdon as the proposal is **situated outside the village envelope, on a greenfield site and the services necessary to support such developments remain nonexistent**. This is therefore not a valid reason.

Elmdon is a **designated unsustainable village**. Uttlesford planning guidelines stated that development should not be on new greenfield sites and that new dwellings should not impact the views of the countryside. The elevated position of the site will be intrusive to preexisting houses on Ickleton Rd and undoubtedly increase light and noise pollution. This is hardly remaining *‘sympathetic to the rural nature of the village’*.

The Uttlesford Local Plan (2005) states that it is *‘important to establish that a need exists’* (§6.32) – with limited to no services, the means to support said need for 18 dwellings is dubious. It also states it to *‘be more appropriate in larger communities providing a basic range of services including a primary school, public transport and adequate infrastructure’* (§6.33). This requirement as outlined is not applicable to Elmdon.

The Design and Access Statement attempts to use examples of comparable development in other villages within Uttlesford:

- Manuden (Appendix A)
- Henham (Appendix B)

Table. Comparison of services and infrastructure in Uttlesford District villages with development/proposed development.

	<u>Manuden</u>	<u>Henham</u>	<u>Gt. Chesterford</u>	<u>Elmdon</u>
Public House	☒	☒	☒	☐
Shop	☒	☒	☒	☐
Public Bus Services ¹	☒	☒	☒	☐
Primary School ¹	☒	☒	☒	☐
Train Station ¹	☐	☐	☒	☐
GP Surgery	☐	☐	☒	☐

¹Recommended Uttlesford Local Plan criteria for sustainable development. Elmdon: these villages are more substantial in size and have access to infrastructure/amenities that are nonexistent in Elmdon. Manuden has a 3-star hotel and both of these examples are within 10 minutes of an international airport.

The use of these cases is nonsensical. It must be noted that the application references these cases as successful appeals, yet fails to acknowledge better examples that are more representative in regard to Elmdon. As is to be expected, such cases have justifiably been rejected – **3226765 (UTT/18/0885/FUL)** in Widdington and **3263440 (UTT/20/1102/OP)** in Bran End to give example. Even Henham has previously failed to enact sustainable development – **3239905 (UTT/19/0293/FUL)**. It is important to note that all of these proposal sites, successful or not, have considerably more or better access to services and infrastructure than Elmdon.

Roads and Safety

The Transport Statement cites that Ickleton Rd has *'two marked lanes and is circa 6m in width for its entire duration'* (§3.13). In reality, Ickleton Rd is a narrow 5-metre-wide road absent of markings which the proposal plans to use as site access. There is limited private parking for households along this road, on-street parking is therefore extensive on this already narrow lane. The average car is approximately 1.8 metres, leaving just 3 metres for commuting cars, cyclists and of course farm traffic to manoeuvre. This has already caused collisions and near misses in the past.

In the recent 2021 census, 45.9% of Elmdon households have 2 vehicles and 22% have 3 or more. To reiterate, there are no public transport services when disregarding the one limited school bus service, hence the prospect of the additional development contributing multiple vehicles per household is inevitable. The Village Design Statement also concluded that ***'car ownership is high and consequently there is considerable movement in and out of the parish by car'*** (2019). Subsequently, the proposed development has the potential to exceed the road capacity by adding a significant amount of vehicles to these already congested country lanes.

Accessibility to the site is planned to be almost directly opposite a T-junction to a residential area and access to the nearby Icknield Way. Vehicles park along the curtilage of the development site along this section of Ickleton Rd and is where a primary school bus picks up young children. The means of access to the site can therefore be frequently obstructed. This of course can occur simultaneously when locals commute to work and children leave to attend school. This is neither sustainable as Uttlesford District Council already struggle to maintain the integrity of the road, nor is it safe.

HGV access for deliveries would also be unsuitable due to the vulnerable location of the site access point. This also contributes further towards the generation of traffic and potential congestion. This being near to where vehicles entering the village start to reduce speed from 60mph down to the village limit of 30mph.

The pedestrian path is on a blind corner where vehicles are often required to drive on the right side of the road due to parked vehicles obstructing the drivers line of sight (entering the village from the east along Quickset Rd). This is potentially dangerous for both drivers

and pedestrians alike.

Risk of Flooding

There is a history of flooding along Ickleton Rd where houses immediately adjacent to the proposed plans have suffered from flash flooding. A Parish Council Extraordinary Meeting was held as recently as 2021 due to this – refer to §21.13. This states ‘**floodwater had entered the cottages on several occasions**’. There were even recommendations for the installation of flood doors outside of the remedial work required to repair the affected cottages (replacement of floorboards and damp proofing). Appendix E – Flood history in the district of the Strategic Flood Risk Assessment (SFRA) has recorded flood incidents in the village as early as 2003. In previous flood incidents, residents along Ickleton Rd have adopted the use of sandbags in an attempt to mitigate the risks of damage.

To potentially exacerbate the already evident flood risk downslope of the proposal site seems unsustainable and fails to consider the preexisting community. The Design and Access Statement claims that ‘*limited adverse impacts are not such as to outweigh the benefits of this proposal*’ (§4.2) – this is evidently untrue. The said benefits still remain ambiguous even after consulting the application, these must be exclusive to the applicants alone.

In The Elmdon Conservation Area Appraisal and Management Proposals (2014) it is stated that geology of the area ‘*largely comprises boulder clay plateau*’ and further references the presence of clay even in the area’s chalky soil (§1.36, §1.43). Coupled with increasingly dry summer periods and more significantly the elevated prospective development site, there are concerns of increasing flood risk for residents with housing on Ickleton Rd – which ‘**runs down a small valley where most of the houses are located**’ (2019).

The topography of the proposal site already causes captured water to be irrigated towards Ickleton Rd, which has previously contributed to the flooding in the past as stated. Elevated development directly above a road susceptible to flooding is unsustainable, be it from an environmental, economic or social perspective.

It is my opinion that the application fails to substantiate how the proposal is in any way an example of ‘*sustainable development*’ that has ‘*wide-ranging benefits*’. I urge the Planning Inspectorate to conduct a site/village visit to appreciate the extent to which this proposal is inappropriate and unsustainable for the community of Elmdon and the wider Parish.

Kind Regards,

A Carter

15 March 2023

