

Justine Cotterill



Inquiries & Major Casework Team,
The Planning Inspectorate,
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15th March 2023

Dear Sir/Madam,

UTT/23/0246/PINS | Consultation on S62A/2023/0015

Application for outline planning permission for the erection of 18 dwellings including provision of access road, car parking and residential amenity space, a drainage pond, and communal open space with all matters reserved for subsequent approval except for means of access and layout

Grange Paddock, Ickleton Road, Elmdon, Essex

These objections are in respect of the above outline planning application, for the erection of 18 dwellings including the provision of access road, car parking and residential amenity space, a drainage pond and communal open space with all matters reserved for subsequent approval except for means of access and layout at Grange Paddock, Ickleton Road, Elmdon.

These objections have been prepared having regard to the submitted planning application together with the various plans and accompanying documents which include amongst other things a Design, Access, Heritage and Landscape Statement, Transportation Statement, Flood Risk Assessment, Arboricultural Impact Assessment and Preliminary Ecological Assessment.

It is requested that the relevant planning officer undertakes a site visit of the above property, so as to have a proper understanding of the impact of the proposed development.

At the outset it is acknowledged that the application site is located outside the defined settlement boundary of Elmdon in the Uttlesford Local Plan 2005. The site therefore lies within open countryside where residential development is generally unacceptable unless it is for one of a number of limited circumstances under Policy S7 of the Uttlesford Local Plan 2005. The application is not for residential development in any one of those categories.

It is acknowledged that at present, the Council cannot demonstrate a five year supply of deliverable housing land. Accordingly, paragraph 11(d) of the NPPF is engaged and requires that planning permission should be granted unless: -

“any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in this framework taken as a whole.”

The harm caused by these proposals significantly and demonstrably outweigh the perceived benefits, which are in any event overstated by the applicant. These include: -

- The application site will involve the loss of area of Grade 2 agricultural land which is defined as best and most versatile land within the NPPF. Such land is good quality, high yielding agricultural land and can support a wide range of agricultural and horticultural crops. Both the NPPF and local plan policy seek to protect the loss of such land. The applicant has failed to assess whether the proposed development could be accommodated elsewhere within the district which would prove to be more sustainable or on poor quality land. The applicant acknowledges this deficiency in their submissions.
- As stated the site comprises open countryside and the NPPF recognises: -

“the intrinsic character and beauty of the countryside for its own sake.”

The Council’s Landscape Character Assessment states that Elmdon has a: -

“landscape of big sky and seemingly continuous views on higher ground.”

The proposed development would result in a loss of this character and views which would cause detrimental harm to landscape character and quality in the area.

- The site lies within an area of potentially sensitive archaeological deposits being located on the edge of the historic settlement of Elmdon. There is potential for prehistoric and medieval features within the site. The application is devoid of any archaeological assessment in terms of geophysical analysis or trial trenching. It is therefore not possible to assess the impact of the proposed development on these important heritage assets.
- The site lies near Elmdon which encompasses the Scheduled Ancient Monument of Castle Grove, a ringwork 370m northwest of Elmdon church, as well as a historic farmstead. The proposed development has potential for significant harm to these important designated assets which have not been fully assessed.
- Elmdon is an unsustainable settlement for the scale of residential development proposed. There is no train station, school, doctors surgery, shop, post office, pub and an extremely limited bus service. The proposed development will be entirely car dependent with no choice of other transport modes.
- The Ecological Assessment submitted is insufficient in that it fully acknowledges that additional surveys will be required. The report acknowledges that bats are likely to commute and forage in the area but no bat surveys have been undertaken. It is therefore not possible to make an accurate assessment of the impact of the proposals on protected ecological species. This equally applies to a range of other ecological species e.g. dormice.

- The submitted Transport Assessment is not based on any traffic survey within Elmdon. The assessment uses a range of TRICS data which underestimates the likely traffic generation from the proposed development, particularly given the unsustainable nature of the site. Accordingly, the transport impact has been underestimated and that the development will cause highway safety issues in the settlement.
- The Design and Access Statement is inadequate and has not been prepared in accordance with recognised guidelines for the preparation of such documents. For example it suggests that the proposed attenuation pond would be on the wrong area of the site. Furthermore, the Design and Access Statement is limited on its assessment of the character of Elmdon and we believe that the proposed development would be out of character.

Conclusion

In view of the above, the harm caused by these proposals would significantly and demonstrably outweigh any perceived benefits by virtue of: -

- The loss of productive BMV (Grade 2) agricultural land which cannot be replaced.
- The loss of intrinsic quality and beauty which is important in its own right.
- The potential harm to important archaeological assets.
- The significant harm to designated heritage assets including a SAM and listed buildings.
- That the settlement is unsustainable for additional residential development by virtue of its lack of facilities and services.
- The potential adverse impact on protected ecological species and the acknowledgement that insufficient surveys have been undertaken.
- Inadequate Transport Assessment which is not based on actual update survey information.
- The development has the potential to cause highway safety issues in the area particularly as its impact has been underestimated.

It is therefore respectfully requested that planning permission be refused for the reasons set out above.

Yours faithfully

Justine Cotterill