From:

Sent: 06 September 2023 21:56

To: Section 62A Applications <section62a@planninginspectorate.gov.uk>;

Subject: Section 62A Planning Application: S62A/2023/0019 Land to the north of Roseacres, between Parsonage Road and Smiths Green Lane, Takeley, Essex, CM22 6NZ (Land known as Bull Field, Warish Hall Farm, Takeley, Essex) - GOV.UK

Dear Sirs,

Please see below my representations, observations and comments on the application by Weston Homes to build 96 properties on the 'Bulls Field' site in Takeley.

My overarching concern about the Bulls Field site application is predominantly that it is the very thin end of a very thick wedge. It is clear that Weston Homes intends to push very hard at every boundary to fully develop the entire area that it has acquired (in blue on the design and access statement) and it will continue to submit applications—until it achieves it. The CPZ will at that stage have been eroded to the point of non-existence (as usual!). The area in question has been and is currently agricultural, and given the ongoing need to increase rather than decrease the agricultural capacity of the UK to make it more self-sufficient in the production of food, there would need to be an overriding requirement to change the current status of the land involved. From that perspective alone there are good grounds for refusing this planning application. Indeed, it may be that Weston Homes need to be formally notified that further planning applications for this area will be considered as vexatious.

The proposed development for Bulls Field is cynical and a contrived 'marketing ploy' to make it seem like it is 'adding community value'. The proposed site currently is green as it is an agricultural field; but once it has been desecrated by having bricks and concrete thrown at it, it will clearly not be green. Having lived in the village for many years, there is 'local historical knowledge' that contrary to what is claimed in the application documentation, development of Bulls Field will have potentially severe ramifications for water run-off including impact on adjacent and adjoining properties particularly during periods of heavy rainfall or snowmelt. The paths and by-ways through the surrounding area (around Bulls field and along the side of Priors Wood) are already not easily passable during wet and inclement weather - removing vet more land that currently serves as soakaway/storage and slow release for accumulated rainfall, in order to facilitate the proposed development, will clearly make that worse, not better, as the ditches bordering the area do already overflow after heavy rain. The application clearly contains a number of factual errors and identified unknowns, a specific example of the former is the claim that there is no additional flood risk, and of the latter that there is no identified sewage drainage – both are worrying in their own right as part of a submitted plan for development.

In terms of flood risk the statement that there is no increased risk associated with the planned development is scientifically and factually untrue. Any reduction in existing soakaway, water capture, retention, and controlled release associated with the existing area of arable farm land caused by paved areas, buildings, tarmac, means that <u>by definition</u> there is significantly lower environmental storage area so the water density/sq.m will be higher, and or there will be a need for significantly greater runoff into surrounding ditches. Given that the worldwide scientific community consensus is forecasting that increased oceanic evaporation driven by climate warming (already recently demonstrated in various parts of the world including the US, Europe, India, and China) will undoubtedly lead to more frequent and

severe 'rainfall events' it is not tenable to claim no additional risk of flooding, if only in relation to other properties with the immediate and adjacent locale, including Smiths Green and Jacks Lane.

Moving on from concerns of too much water in times of heavy rainfall, the adjoining properties already suffer from insufficient water for domestic use. The area is flat and the water pressure is at best variable and sometimes (particularly during summer months) virtually non-existent so it is not possible to irrigate the end of our garden using a hosepipe, as mains pressure simply doesn't push it that far. This is particularly noticeable during periods of drought – something that is also forecast to be increasingly common in the future due the impacts of climate change . Low water pressure is already a known concern across the whole of Takeley village and from a personal perspective we are already considering the purchase of a private water pressure improvement system. Consequently, from the water supply perspective alone, this proposal should be refused, or at least put on hold until the water supply has been satisfactorily upgraded across the village. Asking the water supply company if there is a problem is like asking turkeys to vote for Christmas – of course their answer would be no, in spite of any evidence to the contrary

Mains drainage for waste water and sewage is typically not available across the existing properties on Smiths Green, Warish Hall Road, and in Jacks Lane – most use some form of on-site 'water treatment plant' and at our property, at significant expense, we have already invested in a water treatment plant. This became necessary when the demand from previous large scale housing developments in the surrounding/adjacent area meant that the prior water drainage system ceased to be able to support our previous cesspit system. It is unclear where or how the new development will tap into an existing mains drainage connection. Clearly there is significant potential for the proposed development to further adversely affect existing ditches, watercourses and adjacent properties.

In terms of transportation and access implications of the proposal the access onto Parsonage Road An additional 96 properties implies that some 180 additional vehicles will be requiring to use that road particularly at peak times, and that addition would be a significant increase over the existing traffic, which is also scheduled to take the additional traffic from the current developments. It will also significantly and adversely affect the junction between the B1256, and Parsonage Road at the 4 Ashes traffic lights. I would note also that Parsonage Road carried significant heavy good traffic for both Stansted Airport and the landfill site in Elsenham, so there must be concerns about the ability of the road to carry the additional traffic, as well as the additional pollution impacts for the existing property owners on Parsonage Road and adjoining roads including Longcroft and Roseacres. Furthermore, the proposed development would generate additional ongoing commercial traffic in order to 'service' the needs of the properties and householders Consequently, in my view the increase in traffic density would therefore significantly reduce the amenity value not only to the existing residents of Takeley village, but also to the residents and businesses in in the other new developments.

It is noted that the site proposed for this development is currently and historically agricultural land on the edge of the village and overlooks/links into open fields, It must be remembered in a planning context that biodiversity lives in a 24/7/365 environment – not just the hours of daylight.

I would note that The Royal Commission's 26th report, The Urban Environment and the Royal Commission on Environmental Pollution report 'Artificial Light in the Environment' identified light pollution as a significant factor shaping local environmental quality and it is

increasingly clear from scientific research that deleterious effects on photosensitive organisms and biodiversity are not the only issues raised by light pollution wherever artificial light floods into the natural world such as adjacent fields, ditches, woods and paths. Natural light intensity and spectral content varies during the day–night (diurnal) cycle, the lunar cycle and the seasonal cycle, and all organisms -plants, insects, animals including humans, have evolved to respond to these periodic changes in light levels. They control and affect life and its rhythms – migration, reproduction, feeding mating, emergence, seasonal breeding, migration, hibernation and dormancy, and in plants, flowering and vegetative growth. As the proposed development directly interfaces onto an existing rural environment any artificial lighting will directly and adversely impact the current biodiversity, flora and fauna that currently use the area.

The overall design of the scheme does not appear to be substantially different from one that was rejected originally, in terms of the proximity of the access road and associated infrastructure to the edge of Priors Wood. What is clearly missing from the supporting documentation is any consideration of the overall environmental effect on the flora, fauna, and support conditions at the edge of the wood. From that perspective (as a minimum in terms of the light pollution (spectral, diurnal, and seasonal) that the proposed development would cause) and given that Priors Wood and its 'ecology' has had 'ancient lights' access for many hundreds of years, the proposed development should not compromise that in any way. Consequently, no building lighting or other artificial light sources should be allowed within at least 20 metres of the edge of Priors Wood and any light sources within the development must have zero 'spill' into the wood itself.

For the avoidance of doubt, this means any artificial lighting, and given that the habitat and range of those insects and other creatures who live in and around the hedgerows extends beyond the hedgerow itself, there should be at least a 5 metre 'natural habitat' interface space to any developed area.

In my view the proposal should be refused as it will dramatically change the natural light cycle and visual amenity that the local residents (humans, animals and plants) currently enjoy.

Allowing development will undoubtedly adversely and irrevocably impact the existing natural ecosystem which supports a much wider range of biodiversity, both plants, insects, birds and animals including deer which use the Bulls Field as a 'transit route' (day and night)between an adjacent wooded 'safe' area in Jacks Lane, and their wider territory. Some other local animals such as foxes and bats are largely nocturnal. There is no doubt that this development would squeeze the existing and historical biodiversity out of the area, and would clearly destroy it within the area. When the deer and other species such as bats and birds butt up against the edge of residential developments their habitats and foraging ranges are directly and adversely affected, such that they are often no longer viable, and the biodiversity is lost Similarly for the other fauna species that currently call the proposed developments area 'home'. They do still have places to roam but those places are being pushed more and more into smaller areas, which artificially increases other environmental pressures, inter-species competition, and habitat destruction. Having the ability to see and appreciate local wildlife 'in situ' is undoubtedly a social and environmental benefit and amenity for the community and the local people, and that will certainly be destroyed if this development is permitted. Biodiversity is the legacy that we pass on to future generations, and maintaining, and preserving it should be an absolute priority within the planning process.

We are not talking about protecting species that are in danger but we must not ignore the need to protect those that are NOT in danger so that they don't become endangered. It should come as no surprise that it is well documented that this country has significantly

reduced its biodiversity over many centuries to a greater extent than almost all the rest of the western world. That is a trend that needs to be stopped and wherever possible reversed, refusing this application would be seen as beneficial in environmental and biodiversity terms

The plan itself appears to be incoherent in terms of design and diversification for a property development, particularly, given the urgent need for social and affordable housing. What is proposed manner will, I fear, lead to a small haphazard isolated model village, given the 'self contained' nature of the plot there may well be no tangible thread to build any community spirit on, or integrate with the existing Takeley community. In essence it would be an isolated 'enclave' - potentially a recipe for disaster both at an individual, social, and mental health level.

Overall, the proposed application fails to provide any overwhelming arguments for approval, and there are clearly many and varied reasons as outlined above why it should be refused – but at a social and community amenity level the proposed development in and of itself will change the rural nature of the existing countryside environment, irreversibly, for both this and future generations, not only the humans but also for the native plants insects and other wildlife. That alone should be reason enough to refuse permission.

Yours Sincerely

Paul K Kimber

Post Script Comment

As a generic, it is clear from the various submissions associated with this developer in relation to this land, that the planning process and those who administer it are increasingly out of step with and do not represent the views of the local population who pay their salaries. It is an unrealistic and biased process when a developer can put man-months or man-years of effort into developing and submitting plans and then expecting the local population who are affected by those plans to be able to carry out a detailed, in depth analysis and response in 5 weeks. The process needs to be fundamentally reformed and updated, before the population involved gets to the point where they perceive/believe that the process itself is causing irreparable damage to their environment; when that happens, they will take matters into their own hands and as a minimum require that their elected representatives revise the planning processes and accountability so that they are more equitable; given where things are with this developer, that point may not be far away. As a personal view, the planning process needs to uniquely represent the views of the population in the locale; it is clearly not a requirement that the planning process or administration work in conjunction with developers to help them develop plans to keep them in business. they work for the people not the businesses.